

Submission in Relation to Project Mars Data Centre (SUB-120028238)

I make this submission to NSW Planning in relation to the proposed Project Mars Data Centre at 12 Mars Road.

I object to the proposal and request that consent be refused. In the alternative, if the proposal is to be considered further, it should only proceed following substantial redesign and the imposition of strict conditions that demonstrably avoid adverse impacts on sensitive receivers. My concerns relate to (among other matters) the cumulative impacts upon the precinct and infrastructure capacity arising from the concentration of data centres within the business park at Mars Road; the site's proximity to residential land, community open space, and a public primary school; deficiencies in the technical assessments (particularly noise and vibration); noise risks and air emissions associated with back-up diesel generators; visual amenity and built form impacts; and the effect of traffic and parking spillover issues.

Precinct Cumulative Impacts and Infrastructure Capacity

Available public information indicates that multiple data centres (reported as up to four) are proposed within the Mars Road Business Park. In my submission, the proposal should not be assessed in isolation where the practical consequence is an intensification of data centre development in a constrained precinct. A precinct-level cumulative impact assessment is required to support a transparent and evidence-based decision.

The clustering of high-security, energy-intensive and water-intensive infrastructure increases cumulative risk and impact exposure. It also increases the likelihood of simultaneous back-up generator operation across multiple sites during supply interruptions, compounding both noise and air emissions at nearby sensitive receivers.

The Air Quality Impact Assessment identifies that, in an "emergency scenario" (for example, a local grid outage), concurrent generator operation associated with existing facilities (including AirTrunk and the Apollo Place Data Centre) and Project Mars "may result in significant cumulative air quality impacts under emergency conditions". Given the proximity of a childcare centre, a public primary school and a significant number of residences occupied by young families, including children, this is a material planning consideration. The proposed response of notifying neighbouring properties does not avoid or mitigate emissions and should not be treated as an adequate control measure.

The community has already experienced prolonged disruption associated with enabling works for data centre infrastructure, including extended upgrades to water infrastructure in Banksia Close, Cullen Street and Hallam Avenue. With additional proposals in the precinct, there is insufficient certainty about the scale, duration and location of further upgrades (including both water and electricity supply), and no clear framework is presented for managing cumulative construction impacts on local streets and amenities.

Proximity to sensitive receivers - residential, community and educational

The Project Mars Data Centre is proposed within the Mars Road Business Park on land zoned E4 General Industrial. The *Lane Cove Local Environmental Plan (2009)* sets objectives for the E4 zone

which are relevant here, including:

- Minimising adverse impacts of industrial uses on surrounding land uses.
- Ensuring that landscaping is a prominent part of development as seen from public areas and neighbouring properties.
- Recognising the interface with nearby residential areas and reducing the potential for conflict between industrial and residential activity.

Although data centres are permissible with consent in the E4 zone, permissibility does not of itself establish that this siting is appropriate. The proposal is located at the edge of the E4 land, directly adjoining a community nursery and residential properties to the east (R2 – Low Density Residential), Blackman Park to the south (RE1), and a public primary school approximately 160 metres to the north-east. This interface heightens the likelihood of land use conflict and adverse amenity impacts.

The closest dwellings are located within approximately 50 metres of the proposed development. The local context does not include a major arterial road or similar high-noise corridor that could function as a buffer; surrounding streets (including Banksia Close, Avalon Avenue and Wood Street) operate as local residential streets. This context increases the sensitivity of nearby receivers to continuous mechanical plant noise and other operational effects.

The eastern part of the business park currently accommodates lower-impact industrial activities (such as warehousing) that generally sit alongside nearby homes and schools without the same intensity of ongoing impacts. A data centre has a different operating profile, with continuous mechanical plant, different visual bulk, and distinct air quality and noise considerations compared with many typical E4 uses in this precinct.

Data centres typically operate continuously and rely on large-scale mechanical plant and standby generation. Where such facilities are proposed in close proximity to sensitive receivers, the assessment and design response should be demonstrably conservative and should prioritise avoidance of impacts rather than reliance on later-stage design refinement or operational management plans.

The benefits of setting clear buffer zones between industry and residential areas or other sensitive land uses provides clarity for industry and communities and lessens potential ongoing impacts and conflicts between land uses. Consideration at a strategic planning level must be given to implementing minimum distances from data centres to residential properties within NSW for reasons such as minimising risks of cyber and physical attacks (s1.4 of the Social Impact Assessment EIS), maintaining amenity for adjacent landholders, lowering risks of air pollution from back-up diesel generators and protecting residents from ongoing industrial noise. Other jurisdictions around the world are implementing or investigating buffers of between 200 and 300m between residential areas and data centres. NSW needs to follow suit.

Internationally, separation distances between data centres and residential areas are being considered and, in some cases, adopted, commonly in the order of 200–300 metres. In this context, and given the continuous operational profile of the proposal, a significantly greater setback from sensitive receivers is warranted than is provided at this site.

Even Data Centres Australia, the industry peak body, acknowledges the sensitivity of proposals near residential boundaries, stating: *“Data centres are built on land zoned for industrial development, not residential. However, we recognise that developments near the boundary of residential areas can have impacts on local communities, and these must be managed sensitively and transparently.”* (<https://datacentres.org.au/response-to-the-australian-governments-expectations-for-data-centres-and-ai-infrastructure-developers/>).

In addition to amenity impacts, the close siting of a data centre to residential properties and community facilities raises security and resilience considerations. In Australia, the Security of Critical Infrastructure Act 2018 (SOCi Act) regulates critical infrastructure across multiple sectors, including the “data storage or processing” sector, and imposes security and incident reporting obligations on regulated assets and responsible entities. Where a data centre (or associated data storage/processing asset) is, or may become, subject to the SOCi framework, this indicates a higher security risk profile and the need for robust physical security and cyber resilience measures, with potential flow-on implications for adjacent land uses.

As a matter of general international best practice, higher-risk infrastructure is typically sited and designed to reduce interfaces with sensitive receivers, including through meaningful separation distances, controlled perimeters, and avoidance of immediate adjacency to homes, schools and high-use public open space. Where close interfaces cannot be avoided, best-practice assessment requires a transparent demonstration that risks have been reduced so far as reasonably practicable through siting, layout (including placement of access points and security infrastructure) and robust security and incident management arrangements. In this context, the EIS should justify the proposed boundary siting against these principles and demonstrate how physical security, cyber resilience and incident response would be addressed without transferring risk or day-to-day impacts (for example, increased security presence and associated activity) to adjacent residents, families and community users.

Accordingly, the proposal is not supported in its current form due to its location on the E4/R2 interface. If the project is to proceed, it should be redesigned to materially increase separation to residential properties and other sensitive receivers, with built-form, plant placement and acoustic controls demonstrated to achieve compliance under conservative assumptions.

Noise and Vibration Impact Assessment Report Deficiencies

The EIS relies heavily on the Noise and Vibration Impact Assessment prepared by SLR Consulting; however, in my submission the assessment does not provide sufficient certainty that operational noise impacts have been appropriately characterised or that compliance can be achieved at nearby sensitive receivers.

1. Receiver selection: The monitoring and assessment locations appear insufficient to represent the range of nearby residential receivers. Additional receivers should be assessed on the western side of Wood Street (within NCA02 in the EIS) and further south along Wood Street (within NCA03). Given local topography, some dwellings may experience greater exposure than is captured by the current receiver set, and reliance on a single location (L03) is not, in my view, adequate.

2. Meteorological conditions: The Lane Cove River valley and Blackman Park area is known to experience temperature inversions, particularly in autumn and winter. Inversions can increase noise propagation over distance. While the report (section 4.2.7) states:

“The nearest sensitive receivers are generally within 350 m of the proposal site and the effects of weather on noise levels are expected to be minimal...As such, the assessment has conservatively applied noise-enhancing weather conditions for all periods as per Option 1 of Fact Sheet D of the NPfI.” It is not clear from the EIS whether local inversion frequency and intensity has been specifically characterised for this site and whether sensitivity testing has been undertaken to confirm that the adopted assumptions are conservative for worst-case amenity outcomes.

3. Baseline monitoring conditions: The report states that unattended monitoring occurred in February, March, April, November and December 2025. During the broader period, extensive infrastructure works by Interflow Pty Ltd to install additional mains water infrastructure were underway in Banksia Close, Cullen Street and Hallam Avenue (involving excavation, heavy vehicles, construction and paving, including at times during night hours) from around October 2024 through to at least April 2026. The EIS does not clearly demonstrate how such construction noise was excluded from baseline datasets or how this potential confounding factor was managed.
4. Indicative plant and deferred design: The assessment indicates that key items of operational plant, and some mitigation measures (including louvres), are indicative and will be finalised during detailed design. For a development operating 24/7 and located close to sensitive receivers, this level of uncertainty is not consistent with good practice and does not enable the consent authority to be satisfied that compliance will be achieved.

This concern is reinforced by the report’s statement that *“additionally, all mechanical plant is indicative and will be reviewed during detailed design once tenant requirements are confirmed”*. Recent reporting² regarding compliance issues at another data centre within the same business park illustrates why conservative assumptions and defined plant schedules are necessary at approval stage, particularly where residences are substantially closer to the proposed Project Mars facility than to existing facilities referred to in that reporting.

“During Planning NSW’s assessment for SSD-9741’s third modification, its own report found that Phase 1 alone – just 25 per cent of the full facility – was already operating 5 dB(A) louder than the noise predicted for all four phases combined. The discrepancy was attributed to chiller fan speed loads running at 60 per cent rather than the assumed 35 per cent.”

(<https://inthecove.com.au/2026/04/28/lane-cove-data-centre-compliance/>). This example illustrates how noise outcomes can differ materially from predictions where assumptions are used in place of detailed design and confirmed operating parameters.

Given the siting and the reliance on indicative plant schedules, I submit that the proposal presents an unacceptable risk of non-compliance and ongoing amenity impacts. At minimum, NSW Planning should require a revised assessment based on confirmed plant, conservative operating assumptions, and independent review, with conditions that require post-commissioning compliance verification and enforceable remedies if limits are exceeded.

Noise and Air Emissions from Back-up Diesel Generators

Back-up diesel generators can emit particulate matter (PM2.5), nitrogen oxides (NOx) and other pollutants during testing and emergency operation. These periods can create short-duration but elevated exposure events, which is a relevant consideration given the proximity of sensitive receivers.

Given the proposed facility is around 160 metres from a public primary school and in the vicinity of other sensitive uses (including a childcare centre within the business park), the EIS should demonstrate that generator testing and any emergency running would not result in unacceptable air quality or noise impacts at these receivers.

Visual Amenity and Built Form Gaps

In my submission, the Visual Impact Assessment does not provide an adequate basis for assessing the proposal's built form and visual effects from surrounding public places and private receivers. The assessment relies on a limited set of viewpoints and appears to place significant weight on existing vegetation, without clearly demonstrating how visual outcomes would change where vegetation is removed or degraded over time.

The EIS refers to a maximum height of 28.3 metres (already materially above the 18 metre standard), while the SSDA Architectural Design Report (Appendix H) identifies a maximum height of 33 metres. This inconsistency should be resolved and all visual material updated accordingly. Further, the Arboricultural Impact Assessment identifies the removal of 90 mature trees (including 39 not readily replaced in the medium term); however, the photomontages do not clearly depict post-removal conditions, which may materially alter visual exposure from nearby streets, residences and Blackman Park.

Additional viewpoints should be provided from locations of high community use and from representative private receivers, including (at minimum) the Avalon Avenue/Banksia Close corner used by families accessing Lane Cove West Public School, properties on the western side of Wood Street (including decks and backyards), Banksia Close residences, and key locations within Blackman Park (including the skate park and tennis courts). Verified photomontages should depict both existing conditions and post-tree removal conditions.

For the reasons set out above, I submit that the proposal should be refused. Key grounds include the inappropriate siting at the E4/R2 interface in close proximity to sensitive receivers (including a public primary school and Blackman Park), unresolved and inadequately quantified noise risks, insufficient consideration of cumulative impacts within the Mars Road Business Park, generator-related air quality and noise risks, and inadequate visual impact information (including height inconsistencies and reliance on vegetation not maintained in the long term). If the proposal is not refused, it should be substantially redesigned to increase separation to sensitive receivers and should be subject to strict, enforceable conditions supported by conservative modelling and independent verification.

Traffic, Parking and Access Issues

The proposal raises material traffic, parking and access concerns during construction. In particular, there is a significant risk of construction worker parking, contractor vehicles and site laydown spilling into surrounding residential streets and areas of high pedestrian activity, including near Lane Cove West Public School and Blackman Park. The EIS does not demonstrate, with sufficient certainty, that on-site provision and management measures are adequate to prevent adverse impacts on local safety, access and amenity.

The site's proximity to the R2 Low Density Residential zone is relevant, as these streets are typically narrow and were not designed to accommodate additional, externally generated parking demand. Existing kerbside capacity is already under pressure at Lane Cove West Public School during morning drop-off and afternoon pick-up periods, when traffic volumes increase and pedestrian movements (including children) are highest. Any displacement of construction-related parking into these streets is likely to exacerbate congestion and increase unsafe parking and maneuvering behaviour.

The potential for parking impacts to extend across a broad catchment of local streets has been identified, including (but not limited to): Alder Avenue, Henley Street, Moore Street, Hallam Avenue, Yethonga Avenue, Currawong Avenue, Eloora Lane, Boyle Lane, Johnston Lane, Beatrice Street, Banksia Close, Avalon Avenue, Wood Street, Cullen Street, Penrose Street, Myee Crescent and Lihon Street.

Blackman Park is also a sensitive location in parking and access terms. The Social Impact Assessment records concerns from sporting clubs regarding parking stress, particularly during early evening peak use (approximately 5:00 pm–7:00 pm) and on Saturday mornings. The park is also used by school and community groups, including bus arrivals that occupy multiple spaces for extended periods. Construction-related parking in or around Blackman Park would displace established users and compound existing access pressures during these peak times.

In summary, I submit that the proposal should be refused. The development is inappropriately located at the E4/R2 interface in very close proximity to sensitive receivers, including nearby residences, Lane Cove West Public School and Blackman Park. The EIS does not provide sufficient certainty that key impacts can be avoided or effectively mitigated, particularly in relation to operational noise and vibration (including the reliance on indicative plant and limited receiver coverage), generator-related air quality and noise impacts (including cumulative emergency operation scenarios), and visual and landscape impacts (including height inconsistencies and reliance on vegetation that would be removed or is not assured long term).

The proposal also raises broader precinct-level issues regarding cumulative impacts and infrastructure capacity, as well as construction traffic, parking and access risks in local residential streets and high pedestrian areas. If the proposal is not refused, it should be substantially redesigned to increase separation to sensitive receivers and to reduce bulk and impacts, supported by conservative modelling, precinct-scale cumulative assessment, and strict, enforceable conditions including independent review and post-commissioning compliance verification.