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ABN: 84 253 359 800

Attention: Patrick Copas,
Department of Planning and Environment.

Dear Mr. Copas,

OBJECTION TO PROPOSED DATA CENTRE AT 12 MARS ROAD, LANE COVE WEST

I am writing to oppose the Project Mars Data Centre proposal in my capacity as the President of the Lane Cove West Public School Parents and Citizens association on behalf of concerned members of our community. It is our view that the proposal represents a land use which is fundamentally incompatible with the educational and residential land uses immediately adjacent the site and accordingly should not be supported.

Our school has approximately 420 children from K-6 and is well-known for offering excellent support for students with additional needs in mainstream schooling. The vast majority of our children reside in the local area meaning the interests of the school and general concerns of local residents are closely aligned. Children are sensitive receptors and rely on planning authorities and legislation to represent them and protect their best interests, we trust that the Department will take due care in exercising their responsibility in assessment of the application.

I want to be clear up front that our objection isn't to progress and development in general, the objection is specifically pertaining to the inappropriateness of the proposed data centre in this location, immediately adjacent sensitive receptors to the north, east, and south. Planning frameworks are in place generally to ensure that development consent is only granted to the right land use, in the right place. We believe the proposed development does not pass this test.

We understand that since the Environmental Impact Statement was first placed on exhibition that several other hyper-scale data centres have been proposed in the business park. We have great concern over the loss of local employment land, local amenity, and the cumulative impact of multiple facilities which we fear will be understated in the supporting documents for each such facility.

More broadly, we expect and assume that the State planning authorities have oversight to the number of these types of facilities proposed for development across Sydney as well as in our local area, and we trust that they work closely with our water and power providers and are satisfied that the unimaginable consumption of these facilities is supported by infrastructure now and into an increasingly climactically varying future. We expect that if they are not confident in the resilience of our utility networks, the development would not be permitted to progress.



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Legislative framework

We query whether there are sufficient legislative frameworks in place to appropriately assess the impact of this type of facility on humans. Emerging consensus from the USA where these facilities have existed for longer suggests that they should not be built within 300m of residential properties and other human-centric land uses. This is recognition that the simple assessment of decibels is an inadequate metric to gauge the impact on humans of 24-hour and low-frequency sounds. As we understand, there is no framework for assessment in Australia at present which takes continual noise and low-frequency noise into account given these data centres are a new asset class.

We request that the Department provide clear guidance how they intend to assess the human impact of the proposal, noting the EIS concedes the facility will be audible, and how they intend to give the community assurance that this facility poses no threat to health and wellbeing of the school and its community when there is no robust framework in place to assist in making this assessment.

Existing zoning

Although large-scale infrastructure like data centres can obtain planning approval through State pathways instead of Council under the Lane Cove Local Environmental Plan, any proposal should still address the objectives of the local planning instrument and give detailed consideration to the local environment.

Under the Lane Cove LEP, the site is zoned E4 – General Industrial. This zone sets objectives for development to, inter alia,

1. recognise the close proximity of this zone to adjoining residential areas and to mitigate potential conflict between industrial and residential uses.
2. encourage employment opportunities.
3. minimise any adverse effect of industry on other land uses.
4. ensure landscaping is a significant element in development viewed from the public domain and neighbouring properties.
5. provide support for innovative technologies and creative industries.

Appropriateness of proposed development

We believe understanding the intent of the zoning is essential when assessing the appropriateness of a development proposal, irrespective of the project pursuing a State or Local approval pathway. When viewing the proposed development against the relevant stated objectives of the zone, we note the following.

1. *recognise the close proximity of this zone to adjoining residential areas and to mitigate potential conflict between industrial and residential uses.*

The development is immediately adjacent homes to the north, east and south, and is 160m from our school. This location subverts typical planning requirements for buffer zones between land uses.



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Buffer zones are particularly important between industrial land uses and human-centric uses such as educational and residential. This context is vital, as there are certain critical aspects of the proposed development which will impact the school and residents which we do not believe have been appropriately addressed in the submission and we are concerned can't be mitigated at all.

Noise

We understand that the facility will be operational all day, every day, from commissioning. We understand also that the facility will be supported by high voltage electrical equipment, an extensive cooling system which will utilise rooftop plant, as well as nearly 50 diesel generators which far from being only used during outages, are all regularly tested to ensure functionality should they be required.

Equipment of this kind produces a constant low hum that will be present day and night, for the duration that the proposed facility operates. Parents in our community have cited research which identifies an emerging body of knowledge associated with the impact of data centre noise on human-centric land uses. This developing knowledge has identified that ongoing background noise, particularly low frequency noise associated with data centres, can disrupt sleep, affect concentration, increase stress and impact learning and wellbeing in children, who are recognised as more sensitive to environmental stressors than adults.

Many parents have noted that the noise assessment prepared in support of the development is both preliminary as the design has not been finalised, and deficient in that it did not select a full and appropriate array of receptors and accordingly can not have an accurate and complete assessment of the ambient noise at critical locations at present. We consider this to be a major concern and something that must be rectified to make sure that appropriate consideration is given to protecting students and residents from damaging ongoing noise exposure.

The World Health Organization has advised that even low levels of continuous noise can affect learning, attention and overall wellbeing in school aged children. These impacts are linked particularly to persistent background noise that interferes with rest and concentration. As a school community located very close to this development, we respectfully request clear reassurance and further information about operational noise, including low frequency noise, generator testing, emergency generator operation and cumulative noise impacts, before any approval is granted to ensure the wellbeing of our students.

In addition to specific concerns over inadequacy in the noise assessment for this development, we're also eager to be reassured by the department that the cumulative impact of all the facilities being proposed will be quantified, considered, and mitigated fully. Precedence must be given to protecting residential amenity ahead of commercial outcomes for developers.

The community are also eager to understand what monitoring of noise will be imposed on the data centre once it's operational and what repercussions the owner of the data centre would face if the permissible limits were breached. These large facilities can be perceived to be 'too big' to switch off or



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interrupt, but their needs should not come at the expense of the existing community nor the welfare of students at our school.

Beyond the technicalities of assessment, our community suggests that the Department must view the introduction of a 24-hour noise source immediately adjacent homes and our school to be a singularly significant loss of amenity for surrounding residents, and a threat to the wellbeing of the children at the school. We contend that the assessment framework is not in place to fully assess these impacts to our community, and urge the Department to proceed conservatively, with caution, and with the interest of the adjacent communities at the forefront of their minds.

Pollution

The proposed facility will be supported by nearly 50 diesel generators which will run intermittently, even during the normal operation of the facility. This requires frequent handling and storage of diesel fuel which will expose children and residents to fuel vapours as well as increased exhaust from operation. These are new impositions on the community as the existing building and other facilities in the business park do not impose this upon us.

Children are recognised as more sensitive to air pollution than adults because their lungs are still developing. Exposure to diesel emissions has been linked in public health research to increased asthma symptoms, respiratory irritation and reduced lung function in children. In response to these risks, many jurisdictions in countries such as the United Kingdom, the United States and parts of Europe have adopted planning policies or guidelines that seek to locate major sources of air pollution and industrial infrastructure away from schools and other sensitive community facilities wherever possible.

This type of 'buffer zone' is a common concept in NSW planning legislation, and one that the proposed development significantly subverts. Our community is concerned that this lack of buffer zone as well as the cumulative impact of the other proposed data centres may pose material risk to the health and wellbeing of our children and believe the assessment of this new imposition is underexplored in the EIS.

Hazardous materials

The facility utilises high voltage electrical equipment, stores diesel fuel, and incorporates nearly 200,000kg of lithium-ion batteries. Any one of these three utilities would be sufficient to pose considerable risk to the local community. All three in one place is a great concern, noting particularly how dangerous lithium-ion batteries are and that they can't be extinguished once alight.

Can the Department please provide us with assurance that these risks are appropriately quantified and mitigated, and that these utilities do not pose risk to the children at the school or local residents. The community wishes to emphasise that this threat is posed primarily due to the facility being proposed immediately adjacent residential and educational land uses without buffer.



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2. encourage employment opportunities.

The proposed facility once operational will support only 26 jobs required to maintain the facility. Any argument made that the AI outputs of the data centre would support employment more broadly would appear misguided given major companies across the globe are citing increased AI support as the main factor in reducing employees within their business.

The land use of the site at present is small-scale office and industrial which would support a far, far greater number of jobs than the 26 new jobs as well as providing spaces and facilities to support small, local businesses which are the backbone of a local community and essential in driving entrepreneurialism in Australia.

The EIS states that the proposed development will increase local and regional employment opportunities. We would encourage the department to look beyond “jobs during construction”, which is broadly agnostic to the type of development taking place, and see that the proposal represents a material reduction in local employment opportunities which contravenes the intent of the zone, removes valuable small scale, and damages the prospects of our children.

3. minimise any adverse effect of industry on other land uses.

The proposed land use is immiscible with the adjacent residential and educational land uses. These are sensitive receptors and the proposed facility is unlikely ever to be able to mitigate its impact on these adjacent communities. Whether the impact be noise, pollution, visual, or other, the proposed facility immediately adjacent such sensitive land uses is unmitigable.

The removal of a significant amount of employment land in the local community for use as a data centre has knock-on impacts to a variety of other businesses which support enterprises in the business park. Removal of a significant number of jobs will have direct consequences for all of these service orientated businesses.

Further, Lane Cove West residents and staff benefit from the 285 bus route associated with bringing employees into the business park. The erosion of jobs in the business park may lead to reduced frequency or cancellation of this bus service to the broader detriment of the community.

The proposed land use has direct, negative impacts on all surrounding land uses, even commercial uses within the business park.

4. ensure landscaping is a significant element in development viewed from the public domain and neighbouring properties.



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The proposal requires the removal of tens of mature trees, and while we understand it's likely the proponent would plant additional landscape, it will be decades before this landscape can full replace what has been lost.

Further, the consideration of "the public domain" necessarily needs to consider the extremely visible location the site occupies and include views from Mars Rd, Wood Street, Lloyd Reece Drive, and Blackman Park. Parents within the community have raised concerns with us that the current visual impact assessment does not appropriately capture views from all relevant aspects and there is concerns these views are cherry-picked for use.

Can the Department please interrogate this and provide the community with assurance that landscaping will be a significant element as viewed from all aspects of the site and that the data centre won't dominate the public domain it overlooks.

5. provide support for innovative technologies and creative industries.

While we acknowledge that data centres could be argued to support innovative technologies and creative industries, we contend that the removal of employment land in inner suburban areas has a greater offsetting negative. The removal of access to small-scale commercial and industrial spaces in inner suburbs stifles the access of small businesses to the spaces essential to enable them to thrive.

We believe a data centre is not consistent with the intention of the zone in this inner suburban location.

Economic impacts

Many of our students live on streets surrounding the school, and thus in direct proximity to the data centre. There is genuine concern that the proximity of the data centre to homes on Avalon Avenue, Banksia Close, and Wood Street, particularly, and the suburb more broadly will have material economic impacts.

Land value reduction

The proximity of the data centre to these streets will materially impact the desirability and therefore value of these properties. Our community are concerned that the bulk and scale of the proposed facility will dominate the landscape and be far more visually overbearing than modelled, the removal of vegetation will worsen this whilst also impacting the biodiversity of the area and the numerous birds and mammals that live here, and the introduction of a 24-hour noise source will totally transform the nature of these quiet suburban streets.

These impacts demonstrate that the proposed development does not make an appropriate interface the residential land. The community are concerned that these factors are material risks, and that they



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have been understated in the EIS. These negative impacts on the surrounding area will naturally negatively impact on the value of homes in the area and we request assurance from the Department that the full array of impacts to residents be assessed and fully mitigated, or the proposal be refused.

Increased cost to install noise mitigation

The proposal represents the introduction of a 24-hour noise source to the area. Should the development proceed, the school and many homes will require installation of ad hoc additional noise mitigation such as installation of double glazing to manage this noise to classrooms and bedrooms. Given the EIS concedes that the facility will be audible, there is a high likelihood of such mitigating measures being required, and this represents a significant cost impost on the school and to residents.

Quiet is essential both for learning and for sleep, the introduction of a new 24-hour noise source is highly likely to require mitigation measures which have not been priced or accounted for in the EIS. Has the Department of Education been engaged to assess the impact of noise on the school and are they likely to provide funding to the school to undertake these works?

Increased utility costs

Our community have voiced concern that the cumulative additional demand of these types of facilities will have material impact over time both on energy and water security, as well as cost. Understanding that this is a concern of aggregation rather than specific to this facility, we request assurance from the Department and from the State government more broadly that these key requirements of modern life are being considered and protected during this period where so many data centres are being applied for.

Construction Disruption

Our community has recently endured significant ongoing disruption for a year associated with water main upgrades required to increase water supply to the business park to support data centres. These works involved significant traffic contraflows and constantly changing intersection configurations around key pedestrian crossings. These works posed genuine risk to children's safety as the regularly changing and highly varied contraflows caused confusion for motorists and pedestrians alike, especially at peak times of drop off and pick up.

This recent disruption would likely pale in comparison to the disruption felt should we need to endure 3 years of construction for the adjacent centre, especially given the noise from the construction of the datacentre during the day would be far more significant. The community requests we remind the Department that 3 years represents nearly half of a child's primary school experience. To endure substantial disruption by way of traffic, noise, vibration, and dust for such a protracted period during this formative time risks longer term implications for children whose learning was interrupted.



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Should any proposal be approved, we would urge the department to give consideration to setting stringent requirements for any land use approval on this site to appropriately consider and mitigate the impact on adjacent neighbours and our school. These stringent requirements should consider additional noise and vibration monitoring, dust suppression and monitoring, stipulation of parking exclusion zones where workers cannot park to avoid conflict with school traffic, and work hours sympathetic to the surrounds.

Summary

There is significant concern in the school community that the proposed development poses substantial and unmitigated risk to our children while at school, and the residents in the surrounding homes. We are concerned also that the data centre would expose the school community to material economic impacts associated with reduced land values as well as costs to upgrade homes to mitigate the data centres impact.

We believe the proposed development, and any data centre, is innately incompatible with school and residential land uses which are immediately adjacent and which are inherently sensitive. We have set out that our objection is not an unfounded opposition to development or progress, but that it is based on genuine concern about the compatibility of the proposed development within our local community, and the irreversible impacts it would pose.

The proposed land use would pose an immediate and enduring loss of amenity to our school, and to the local residents and as such we view it as wholly inappropriate. So fundamental is the misalignment between the proposed land use and the adjacent residences and school that we have grave concern that there is no mitigation strategy, not management framework, and no expert report which would render the proposed development appropriate. On this basis it is the view of our community that the proposal should be rejected.

We request the Department interrogate the content and omissions of the EIS fully and consider the sensitive context of the neighbourhood fully when making recommendations surrounding the development.

Kind regards,

Chris Ephraums

Chris Ephraums

President

Parents and Citizens Association

Lane Cove West Public School