4 May 2026

Attention: **Department of Planning & Environment**

Submission via Planning Portal: https://www.planningportal.nsw.gov.au/major-projects/projects/project-mars-data-centre

Re: Planning Submission: Objection to Project Mars Data Centre (12 Mars Road) — Ref: SUB-120028238

Thank you for the opportunity to comment on the proposal for a 24-hour operational Data Centre at 12 Mars Road, Lane Cove West.

For the reasons outlined below, I object to the proposal and request that consent be refused. If consent is not refused, it should only be considered following material redesign and the imposition of stringent, enforceable conditions that avoid (rather than merely manage) impacts on nearby sensitive receivers.

In summary, my concerns relate to:

1) the immediate interface with residential land, Blackman Park and nearby education/community uses (including the Lane Cove Community Nursery);
2) potential impacts on the Lane Cove Community Nursery from operational heat/microclimate change and construction dust;
3) unresolved risk of operational noise and vibration impacts, including limitations in the supporting assessment;
4) the noise and air quality implications of standby diesel generation (including emergency scenarios where multiple facilities operate concurrently);
5) built-form, height and visual/landscape impacts;
6) construction traffic, parking and access impacts on local streets and high pedestrian areas; and
7) the broader concentration of data centre development within the Mars Road Business Park and the lack of a precinct-scale cumulative assessment.

In addition, the presence of a number of internal discrepancies across the exhibited EIS material (including conflicting assumptions about height, scale and proximity to residential receivers), which undermines confidence in the assessment findings, were also noted and addressed in this submission.

1. **Land-use interface and proximity to homes, community open space and schools**

The site is within the Mars Road Business Park (E4 General Industrial). While a data centre may be permissible with consent, permissibility is not determinative of suitability, particularly where development sits hard against a residential edge and other sensitive uses.

Relevant objectives of the Lane Cove Local Environmental Plan 2009 for the E4 zone include limiting adverse impacts on surrounding land uses, recognising industrial/residential interfaces, and ensuring landscaping contributes meaningfully to how development is experienced from public areas and adjoining properties.

In particular, the E4 objectives emphasise:

- Industrial activity should be designed and operated so it does not unreasonably diminish the amenity of nearby non-industrial uses.
- Landscape treatment should form a visible and durable component of the development when viewed from streets, parks and neighbouring properties.
- Where an industrial precinct adjoins housing, the interface should be planned to reduce land-use conflict over the life of the development.

Here, the proposal is located at the eastern edge of the E4 land and directly interfaces with R2 Low Density Residential to the east, Blackman Park (RE1) to the south, a community nursery adjoining the site, and a public primary school approximately 160 metres to the north-east. This setting heightens the likelihood of land-use conflict and adverse amenity outcomes.

The nearest dwellings are approximately 50 metres from the development footprint. The surrounding street network (including Banksia Close, Avalon Avenue and Wood Street) is primarily local residential in character and does not function as a high-noise transport corridor capable of providing an effective acoustic buffer.

It is also concerning that different technical reports within the EIS pack describe materially different separation distances to the nearest residences (including statements suggesting residences are 200–250 metres away, contrasted with other assessments and monitoring locations indicating residences are approximately 50 metres from the site). Any report relying on the larger distances may understate impacts and should be reconciled.

Similarly, some of the exhibited planning justification material describes residential properties as being located “further east”, which does not reflect the direct and sensitive interface evidenced by the surrounding land uses and the acoustic monitoring locations.

While parts of the business park accommodate comparatively low-impact industrial uses, a data centre introduces a different impact profile: continuous mechanical plant, distinct built-form bulk, and standby generation with associated noise and air quality considerations.

Given the 24/7 operating nature of data centres, proposals at this level of proximity should be assessed and designed on genuinely conservative assumptions, with the primary objective being avoidance of impacts through siting, layout and fixed mitigation, not reliance on later-stage refinement or operational plans after approval.

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 land, 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.

More generally, clear separation distances between industrial infrastructure and sensitive land uses reduce ongoing conflict, provide greater certainty for both industry and residents, and can materially reduce exposure to generator emissions and continuous plant noise. International practice is increasingly considering (and in some cases applying) separation distances in the order of 200–300 metres between data centres and residential areas. Against that benchmark, the boundary-adjacent siting proposed here is not supported.

Even industry representatives have acknowledged that data centre developments near residential edges can create community impacts that require careful and transparent management. That acknowledgement reinforces the need for a more conservative siting response at this location.

Beyond amenity, close placement also raises questions about fire and emergency risk. Data centres contain high-density electrical equipment, backup power systems (including UPS/battery rooms) and, in many cases, on-site fuel storage for standby generation. While these risks can be managed through design and operational controls, the consequences of a major incident (including smoke, prolonged firefighting activity, road closures and evacuation/traffic management) are materially different when a facility is located directly beside homes, a park and education/community uses.

As a matter of good practice, higher-risk infrastructure is ordinarily located and designed to minimise direct interfaces with sensitive uses. Where a tight interface is unavoidable, the proponent should demonstrate, at approval stage, that risks and day-to-day impacts have been reduced so far as reasonably practicable through site layout, conservative separation distances, fire safety design, and clear emergency response arrangements (including access for fire services and management of any

hazardous smoke or runoff). On the information provided, the EIS does not make that case for this boundary location.

Accordingly, I do not support the proposal in its current form due to the immediate E4/R2 interface and the proximity to residences, Blackman Park and nearby education/community uses. If the project is to proceed, it should be reconfigured to materially increase separation distances and to locate plant, servicing and access away from the residential edge, supported by conservative compliance modelling.

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2. Impacts on the Lane Cove Community Nursery

The Lane Cove Community Nursery adjoins the site and is considered a significant environmental and social asset. It functions as community infrastructure, supporting environmental education, local participation and broader greening outcomes, and it relies on suitable growing conditions and a stable microclimate.

It is also notable that, across the exhibited EIS pack, the Nursery is acknowledged in some places (including being depicted in the Social Impact Assessment and treated as a relevant near-boundary location in the noise monitoring) but is not consistently assessed as a standalone sensitive community asset. This inconsistency should be addressed, with a clear and explicit assessment of impacts on Nursery operations and amenity.

Specific concerns about potential operational heat impacts have been raised (including heat rejection), changes to solar access and wind conditions, and broader microclimate effects that could reduce the Nursery's productivity and long-term viability. Given the proximity, these issues warrant clear, site-specific assessment (including "worst case" summer conditions) and a design response that demonstrates adequate setbacks, orientation and screening to protect growing areas and routine operations.

In addition, the air quality material refers to modelling of a large number of sensitive receptor locations, but the exhibited community-facing documentation does not clearly identify which specific Nursery locations (and which parts of Blackman Park and nearby homes/school) are predicted to experience the highest impacts under routine and emergency scenarios. Given the Nursery's direct adjacency, the EIS should clearly map and disclose Nursery receptor points and identify worst-case outcomes, together with any proposed monitoring and response measures.

The impact of construction dust and deposition on plants, soil and nursery infrastructure must also be considered, as well as impacts from construction traffic and site activities immediately adjacent to the Nursery boundary. I do not support any development outcome that results in reduced nursery output. If the proposal is to

proceed, the proponent should be required to provide clear confirmation (prior to determination) that dust suppression, boundary treatments, monitoring and rapid-response controls will adequately protect ongoing Nursery operations, and that operational design controls (including setbacks and solar access) will maintain the Nursery's viability over time.

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3. Operational noise and vibration: unresolved risk and assessment limitations

The EIS places significant reliance on the Noise and Vibration Impact Assessment (SLR Consulting). In my view, the material provided does not give sufficient confidence that worst-case operational noise has been properly characterised or that compliance can be achieved and maintained at nearby sensitive receivers over time.

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

1. Coverage of residential receivers: The selection of monitoring and assessment locations does not appear to reflect the full range of nearby dwellings that may be exposed. Additional representative receivers should be assessed (including along Wood Street, and on the western side of Wood Street) to ensure the assessment captures potential worst-case exposure given local topography and screening.

2. Baseline noise datasets: Unattended monitoring was undertaken across several months in 2025. Over the broader period, substantial infrastructure works (including excavation and heavy vehicles associated with water network upgrades in the local area) were occurring. The EIS should clearly demonstrate how non-representative construction noise was identified and excluded from baseline datasets, or otherwise account for its influence.

3. Indicative plant and staged detail: The assessment indicates key operational plant items (and some mitigation measures such as louvres) are indicative and will be confirmed during detailed design once tenant requirements are known. For a 24/7 facility in close proximity to residences, this introduces an unacceptable level of uncertainty at the approval stage and limits the consent authority's ability to be satisfied that noise limits will be met.

4. Emergency operation and low-frequency/tonal risk: The acoustic material indicates that full emergency all-generator operation is not expected to meet

operational noise criteria and is presented “for information only”. Given the clustering of facilities and the proximity of sensitive receivers, this scenario is foreseeable and should be treated as a genuine amenity/social impact case. Further, where plant and attenuation details remain indicative, unresolved low-frequency/tonal characteristics can materially affect perceived noise outcomes and compliance confidence.

This is reinforced by the assessment’s indication that mechanical plant assumptions may change materially once tenant needs are confirmed. Recent local experience within the same broader precinct demonstrates that real-world operating profiles (for example, fan speeds and load assumptions) can differ from modelling and may result in materially higher noise outcomes than predicted.

Accordingly, modelling should be based on confirmed plant schedules and conservative operating parameters,and should be supported by independent peer review. Any consent (if granted) should require post-commissioning verification testing and clear, enforceable remedies if limits are exceeded.

On the material provided, there is a real risk that operational noise outcomes will not align with predictions and that nearby residents and other sensitive receivers will experience ongoing amenity impacts. This risk should be resolved prior to any determination through revised assessment based on confirmed plant, conservative assumptions and independent review. It is also important that all disciplines within the EIS apply a consistent and accurate sensitive-receiver baseline, rather than alternating between “near-boundary” receivers for acoustic purposes and more distant residential context for other assessments.

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4. Standby generation: air quality and noise (including cumulative emergency operation)

Standby diesel generators can produce particulate matter (PM2.5), nitrogen oxides (NOx) and other pollutants during routine testing and during emergency operation. While these events may be intermittent, they can create short-duration elevated exposures and associated noise impacts, relevant given the site’s proximity to family homes, a childcare facility and a public primary school.

The EIS should demonstrate, with conservative assumptions, that generator testing regimes and any emergency running will not create unacceptable air quality or noise impacts at sensitive receivers. This should explicitly address concurrent operation across multiple facilities within the business park during a localised outage, rather than assessing Project Mars in isolation.

The exhibited material also appears to describe the generator fuel system in different

ways (for example, references to multiple in-ground bulk fuel tanks versus descriptions provided to the community of enclosed steel tanks within a fire-rated bunded room with leak detection). This is not a minor detail: the storage configuration drives dangerous goods risk, fire design, spill/containment measures and emergency response requirements. These matters should be resolved at assessment stage through a clearly reconciled fuel storage description and the exhibition of finalised dangerous goods risk assessment and emergency response documentation (not only future commitments).

In addition, the Air Quality Impact Assessment identifies a low risk of exceedance of the 1-hour NO_2 criterion at some nearest receptors under emergency conditions, whereas the Social Impact Assessment characterises operational air quality impacts as negligible after mitigation. That difference should be transparently reconciled, and the EIS should clearly identify which specific homes/park/nursery/school locations represent the worst-case receptors, together with the proposed approach to operational verification and community notification.

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5. Built form, height and visual/landscape impacts

In my view, the visual and landscape material does not provide a sufficiently robust basis to understand the proposal's built-form impacts from key public and private viewpoints, particularly given the site's proximity to Blackman Park and nearby residences.

The assessment appears to rely on a limited set of viewpoints and on existing vegetation as a screening measure, without clearly illustrating the visual outcome if vegetation is removed, degraded or not maintained over the long term.

There are also material inconsistencies in how the proposal's height and scale are described across the exhibited documents. For example, the Social Impact Assessment refers to an "approximately 18-metre-tall building", while the main EIS refers to a maximum height of 28.3 metres, and community engagement material has described a height range up to approximately 33 metres. The exhibited documentation should clearly reconcile what is included in each height figure (for example, plant, screens, roof structures and generator-related elements) and ensure any Clause 4.6 / height variation justification is based on the true maximum envelope.

Further, repeated references to a "three-storey" data centre risk understating the perceived vertical mass and plant levels shown in architectural sections, which depict multiple levels plus roof/plant/screen zones.

Relatedly, several parts of the EIS place weight on existing vegetation and canopy

outcomes for visual and heat mitigation, yet the project involves substantial tree removal and the exhibited canopy figures are not consistent across the pack. Visual assessments should therefore include “year zero” post-construction scenarios that do not assume mature screening vegetation will remain or exist immediately.

Additional verified viewpoints should be provided from high-use community locations and representative private receivers, including areas used by families walking to and from Lane Cove West Public School, dwellings along Wood Street (including elevated decks/backyards), Banksia Close residences, and key activity areas within Blackman Park (for example, the skate park and tennis courts). Visualisations should depict both existing conditions and credible post-tree-removal scenarios.

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6. Construction phase impacts: traffic, parking and local access

The proposal raises material construction traffic and parking risks. There is a real prospect of contractor vehicles, worker parking and site logistics spilling into surrounding residential streets and pedestrian-heavy areas, including routes used by families accessing Lane Cove West Public School and users of Blackman Park.

Given the immediate adjacency to the R2 zone, local streets are not designed to absorb externally generated parking demand. Existing kerbside capacity is already constrained at school drop-off/pick-up times, when traffic and pedestrian movements (including children) are at their highest. Any displacement of construction parking into these streets is likely to worsen congestion and increase unsafe parking and manoeuvring behaviour.

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.

These impacts may not be confined to streets immediately adjoining the site; they can reasonably be expected to disperse across a broad catchment of nearby residential streets if on-site controls and enforcement are not demonstrably sufficient.

Blackman Park is also particularly sensitive in access and parking terms. Existing demand is high during weekday evening sport and Saturday morning activity, and

the park is used by school and community groups (including buses that can occupy multiple spaces). Construction-related parking and traffic in or around the park would displace established users and compound existing access pressures during peak periods.

More broadly, the public-benefit and transport assumptions appear inconsistent across the exhibited material (for example, differing figures for construction jobs and for ongoing operational employment, alongside a limited number of on-site parking spaces). These inconsistencies should be reconciled because they directly affect traffic generation, worker parking behaviour and the realism of the proposed management response. In addition, key construction impacts (including worker parking and traffic control) are largely deferred to future management plans, which does not provide sufficient certainty for a constrained residential setting.

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7. Precinct context: collective effects and localised capacity

Publicly available information indicates multiple data centre proposals within the Mars Road Business Park. In my view, assessment of Project Mars should not proceed as though it is a standalone development; the practical outcome is a cumulative intensification of energy-, water- and security-intensive infrastructure within a constrained precinct.

A transparent, evidence-based decision requires a precinct-scale cumulative impact assessment that addresses (at minimum) shared network constraints (electricity and water), construction staging and disruption, and the combined operational effects that may occur during abnormal but foreseeable events (such as a localised grid outage).

It is also noted that the infrastructure documentation anticipates augmentation of the high-voltage network and that feeder routes and other supply works may occur outside the SSDA site boundary under separate utility approval pathways. Where off-site infrastructure is necessary for operation, its impacts should be transparently identified and assessed as part of the overall cumulative picture.

The clustering of facilities increases the likelihood that standby generators across several sites will be operating at the same time during supply interruptions, compounding both noise and air emissions at nearby residences, open space and education/community facilities.

Notably, the Air Quality Impact Assessment acknowledges that under an “emergency scenario” (for example, a local grid outage) concurrent generator operation associated with existing facilities (including AirTrunk and the Apollo Place Data Centre) together with Project Mars may produce significant cumulative air

quality impacts. Given the proximity of family residences, a childcare facility and a public primary school, this is a material planning issue. The suggested approach of notifying neighbours does not reduce emissions at source and should not be treated as a mitigation measure.

The community has already experienced extended disruption associated with enabling works for data centre infrastructure, including lengthy water infrastructure upgrades in and around Banksia Close, Cullen Street and Hallam Avenue. With further proposals emerging, there remains inadequate clarity as to the scale, timing and location of additional network upgrades (water and electricity) and no clear, precinct-wide approach to managing cumulative construction impacts on local streets, access and amenity.

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8. Conclusion and requested outcome

For the reasons set out above, I submit that the proposal should be refused. The development is proposed at a highly sensitive industrial/residential interface and in close proximity to homes, Blackman Park and a public primary school.

The exhibited material does not provide adequate certainty that key impacts can be avoided or that compliance can be achieved and verified, particularly in relation to operational noise (including reliance on indicative plant and limited receiver coverage), generator-related air quality and noise impacts (including cumulative emergency scenarios), built-form/visual impacts (including conflicting height/scale descriptions and reliance on vegetation that may be removed or not maintained), and construction-phase traffic and parking impacts on local streets.

The pattern of internal inconsistencies across the exhibited EIS pack further undermines confidence in the assessment conclusions and reinforces the need for refusal (or, at minimum, deferral pending a reconciled and re-exhibited assessment).

If consent is not refused, it should be deferred pending a materially revised proposal supported by: a precinct-scale cumulative assessment (including network servicing and emergency generator co-operation scenarios); a revised noise assessment based on confirmed plant schedules, conservative operating parameters and independent peer review; updated and internally consistent built-form and visual material (including post-tree-removal scenarios); and a construction traffic/parking plan with enforceable on-site controls, monitoring and complaints pathways. Any consent should include post-commissioning compliance verification and clear, enforceable remedies if limits are exceeded.