Dear Planning Committee

Attention: Patrick Copas, NSW Department of Planning

Regarding: Project Mars Data Centre - SSD-82052708 - 12 Mars Road, Lane Cove West

Subject: Objection to Proposed Data Centre Development in Lane Cove West

I am writing to formally object to the proposal to construct a large-scale data centre at 12 Mars Road, Lane Cove West on the basis of **detrimental effects to our wellbeing and health due to the proximity to our home because of inadequate impact assessment in the EIS.** My main concerns relate to:

1. Visual impacts
2. Noise impacts
3. Cumulative impacts and other concerns

Introduction

The proposed Project Mars Data Centre is located within the Mars Business Park which is zoned as E4 General Industrial. Under the Lane Cove Local Environmental Plan (2009) the objectives of land zoned as E4 is required:

• To minimise any adverse effect of industry on other land uses
• To ensure landscaping is a significant element in development viewed from the public domain and neighbouring properties
• To recognise the close proximity of this zone to adjoining residential areas and to mitigate potential conflict between industrial and residential uses

Our residence is located on Wood Street, Lane Cove West (see *Figure 1*). Our boundary is approximately 50m from the planned facility boundary. A recent survey of our home provides a floor level of RL 34.0.

Building C contains data halls, roof-top air-cooled chillers, associated plant and back-up generators. The building is 19m tall, breaching the maximum permissible planning height by 5.7m (rooftop RL 53.8). At it's closest, this building is 20m taller than our house.

Building B contains data halls, roof-top cooling towers, associated plant and back-up generators The building is just under 22m tall, breaching the maximum permissible planning height by 10.3m. (rooftop RL 60.3, top of plant RL 62.77). At its closest, this building is 26m taller than our house.

Figure 2 uses Architectural drawings (EIS Appendix B) and reduced levels provided to give an approximate visualisation of the scale of our residence compared to the proposed development. At only 50m away, this development is a giant compared to the current and surrounding land use and will have an unacceptable visual impact on our home.

The proposed development will operate 24 hours a day seven days a week. There will be constant noise impacts to our residence. The noise impacts generated from the mechanical plant have not been sufficiently assessed as reporting only includes indicative noise levels for examples of typical plant and machinery, not the proposed detailed design plant. By using assumptions without detailed design, the noise assessment cannot accurately predict noise impacts and adherence with regulatory noise limits. Our enjoyment living an indoor / outdoor lifestyle will be heavily disrupted.

As detailed in a recent media article (https://inthecove.com.au/2026/04/28/lane-cove-data-centre-compliance/) there are significant risks with allowing data centres to 'build first and verify later'. As stated in the article, the AirTrunk data centre Lane Cove West is exceeding night-time noise limits by 11dB(A) at the closest sensitive receivers, approximately 150m away. Our home is approximately 50m from the proposed development.

The site directly borders on R2 – Low Density Residential, C2 – Environmental Conservation and RE1 – Public Recreation (Blackman Park). The tables below summarises where the EIS doesn't appropriately consider the proximity of the proposed development to the adjacent land uses, including ours and neighbouring residences, in relation to:

1. Visual impacts – Table 1
2. Noise impacts – Table 2
3. Cumulative impacts and other concerns – Table 3

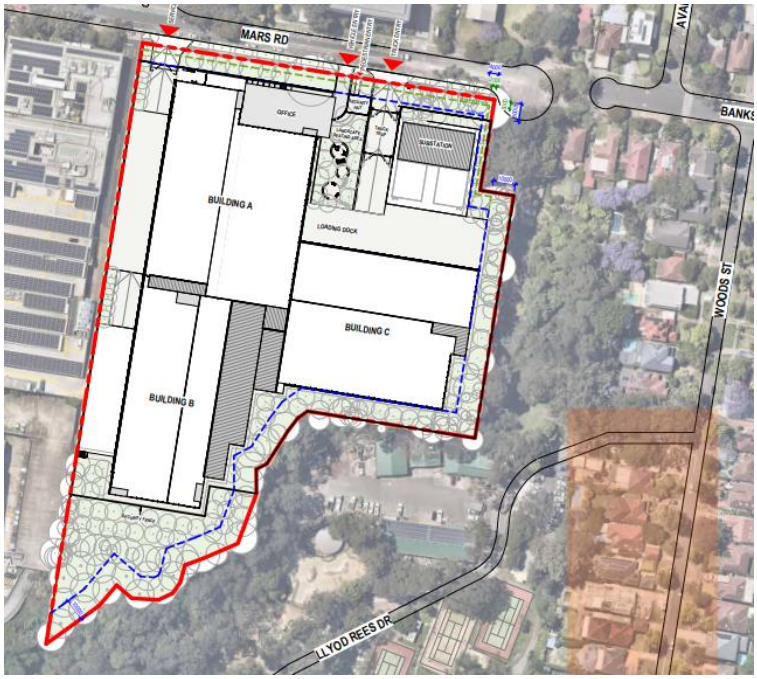


Figure 1: Proximity of proposed development to our residence. (Extract from Appendix B - Architectural Plans MAR-AR-DRG-11001 Rev B)

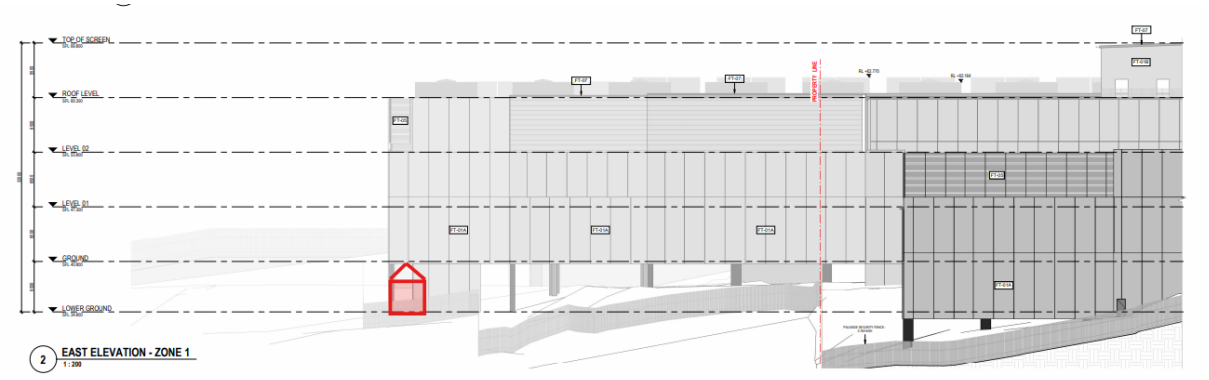


Figure 2: Representation of our residence superimposed on the proposed development using recent survey information. This gives approximate height and alignment to the facility. (Extract from Appendix B - Architectural Plans MAR-AR-DRG-30001 Rev B)

Visual Impacts

Table 1: Visual Impacts		
EIS SECTION	**Subject**	**Assessment Inadequacies**
EIS Appendix B – Architectural Plans	Includes a height which significantly breaches the maximum permissible height standard of 18m above existing ground level with a breach of up to **10.3m above** the height limit surface. (Lane Cove Development Control Plan 2009) *Refer Figure 3*	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. No treatment has been provided along the eastern and southern facades which face the most sensitive receivers, include the most significant height breaches and result in the most significant adverse height impacts.
EIS Appendix H - Architectural Design Report	Site Character has only addressed the Lane Cove West Business Park directly to the north and west of the site within E4 zoning.	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 3 Built Form and Urban Design.** There has been no character analysis immediately to the East and South of the site, in the R2 residential and RE1 park zones.
EIS Appendix H - Architectural Design Report	Site views analysis uses selective views which minimises the proximity of the proposed development to residential areas.	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 3 Built Form and Urban Design.**

		No views were analysed from the properties highly impacted on the western edge of Wood Street and Banksia Close
EIS Appendix H - Architectural Design Report 4.3 Design Response to GANSW Better Placed Policy.	Objective 1 – Better Fit. "The proposed design responds intelligently and sensitively to these factors and makes a positive contribution to the streetscape, neighbourhood and neighbouring sites. In scale and height"	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 3 Design Quality.** The proposed development significantly breaches the maximum permissible height standard, increases shadowing to R2 and RE1 areas. The statement only refers to street frontage on Mars Road. Significant excavation is required for the new buildings, which in scale drops it into Blackman Park, a widely used community recreation area.
EIS Appendix H - Architectural Design Report 4.3 Design Response to GANSW Better Placed Policy.	Objective 4. "Better for people. With in the data halls and supporting facilities circulation and access is direct and of generous width, designed with efficiency, visibility and safety as core priorities."	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 3 Design Quality.** The floor plan of the facility while providing for the safety of people's working within the facility, doesn't suitably address the health and wellbeing of the community in which ii is being developed.
EIS Appendix H - Architectural Design Report 4.3 Design Response to GANSW Better Placed Policy.	Objective 6: Better Value. "Value will also be realised through the overall quality of the proposal - through the manner in which the proposal engages and activates the public realm and contributes architecturally to it's immediate and local context."	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 3 Design Quality.** Insufficient assessment of visual impact has been undertaken for the east and south boundaries of the proposed development. The value is assessed only to street frontage on Mars Road. The proposed development doesn't suitably address the health and wellbeing of the community in which it is being developed.

EIS Appendix H - Architectural Design Report 4.8 Height Limit and Setback.	"Building mass has been thoughtfully placed where the site naturally falls, reducing the visual impact along Mars Road"	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 5 Visual Impact.** Insufficient assessment of visual impact has been undertaken for the east and south boundaries of the proposed development. The value is assessed only to street frontage on Mars Road. Significant excavation is required for the new buildings, which in scale drops it into Blackman Park, a widely used community recreation area. The proposed development doesn't suitably address the health and wellbeing of the community in which it is being developed.
EIS Appendix N - Visual Impact Assessment 3.7 Private View Place Sensitivity	"Potentially heavily filtered views from dwellings on the western side of Wood Street north of the tennis court (number 48,50,52,54, 56 & 58). The potential impacts are considered low." Assumed due to tree coverage.	Fails to ensure that privacy and visual impacts of development on neighbouring properties particularly where zones meet. Fails to demonstrate achievement of **SEARS Assessment Criteria 5 Visual Impact.** Fails to demonstrate achievement of **SEARS Assessment Criteria 7 Trees and Landscaping.** No visual impact assessment has been undertaken from private residences on the western side of Wood Street – the closest residences to the proposed development. Visual impact assessment doesn't address removal of existing mature trees or the long time-frame that new plantings will take to provide similar filtered views. Reliance on filtered views from vegetation is an unacceptable offer by the developer to soften the impact of the development.
EIS Appendix OO – Clause 4.6 Variation Request	'Building massing will be focussed towards the central part of the site and close to the western boundary near the site's interface with surrounding industrial buildings. A generous setback is proposed to the southern boundary of the site'	As seen in *Figure 2,* the building massing is significant to the eastern and southern boundaries and will loom unacceptably over our residence (located 50m away).

		It will comprise a significant 'step-change' from surrounding industrial development. It will ensure that the building is not well-integrated with the site's landscape setting and minimises the visual prominence of the built form. The design does not respond sensitively to the site's natural topography. **Fails to provide sufficient evidence to vary compliance with the development standard** (Lane Cove LEP 2009)

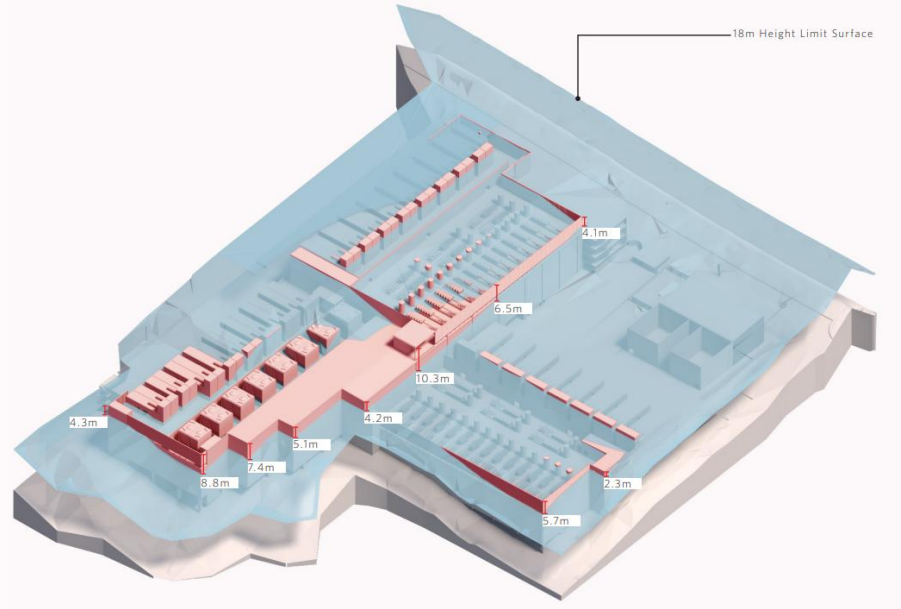


Figure 3: Height Breaches. (Extract from Appendix H - Architectural Design Report)

Noise Impacts

Table 2: Noise Impacts		
EIS Appendix U - Noise Impact Assessment	The selection of one testing receiver (L03) in Wood Street is not representative of the sensitive receivers (private residences) in this area from the proposed data centre.	Fails to consider the close proximity of residential properties to this development and the adverse effect of industry on other land uses. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise** to establish baseline noise levels.
EIS Appendix U - Noise Impact Assessment	Properties assessed as NCA03 Residential vary significantly in distance and topography from the proposed development.	Fails to consider the close proximity of residential properties to this development and the adverse effect of industry on other land uses. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria**

		Operational Noise to establish baseline noise levels.
EIS Appendix U - Noise Impact Assessment 4.2.7	"The nearest sensitive receivers are generally within 350 m of the proposal site and the e□ects 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."	Fails to consider the close proximity of residential properties to this development and the adverse effect of industry on other land uses. Sensitive receivers (private residences and local primary school) are located significantly closer to the proposed development. Fails to consider atmospheric effects and topography of Blackman Park and surrounds, where a natural amphitheatre is created which will amplify and project noise to sensitive receivers. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise** to establish baseline noise levels.
EIS Appendix U - Noise Impact Assessment Section 2	Unattended noise monitoring was completed in the study area in February, March, April, November and December 2025 and was processed to exclude noise from extraneous events.	Fails to identify extensive night-time infrastructure work being undertaken concurrently at time of testing in Banksia Close including road cutting, heavy vehicle movements, digging, construction and paving. Attended noise monitoring was only undertaken during daytime hours, where out-of-the-ordinary noise could be identified for exclusion. This could have reported false night-time levels as higher than normal. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise** to establish reasonably reliable baseline noise levels.
EIS Appendix U - Noise Impact Assessment	Equipment noise levels used for assessment (both for the operation of the data centre and the mitigation measures e.g. louvres) are indicative only.	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** The noise impacts generated from the mechanical plant have not been sufficiently assessed as reporting only

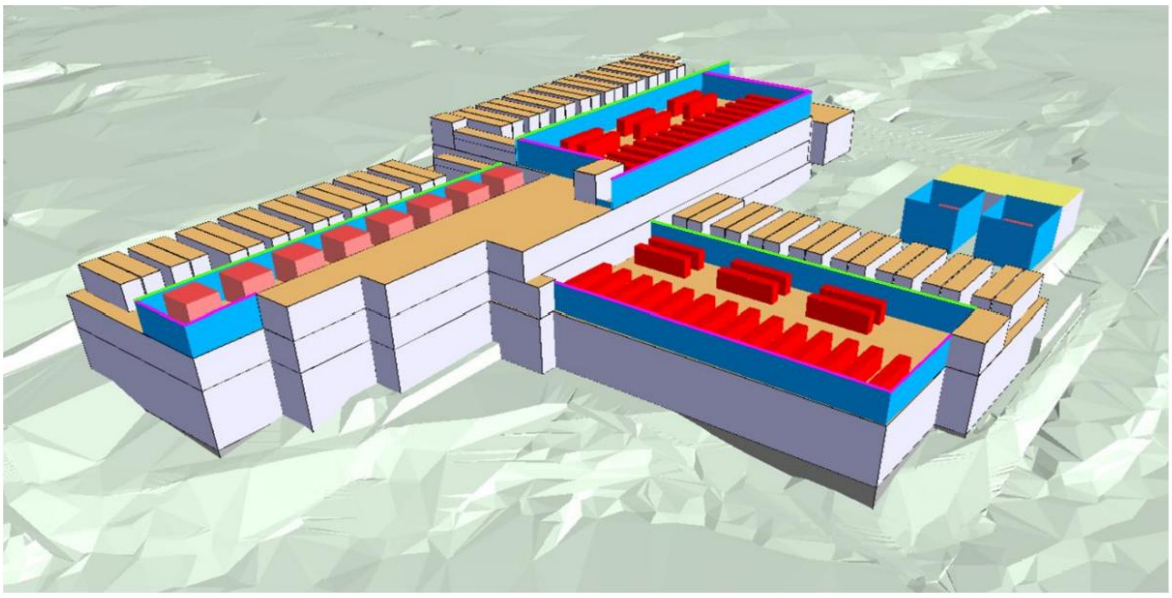
		includes indicative noise levels for examples of typical plant and machinery, not the proposed detailed design plant. By using assumptions without detailed design, the noise assessment cannot accurately predict noise impacts and adherence with regulatory noise limits.
EIS Appendix U - Noise Impact Assessment	Sleep Disturbance. The report provides sleep disturbance screening levels but does not use real design data to assess the proposed development.	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** Table 35 Shows NCA01 residential area with predicted noise levels equalling the sleep disturbance screening level, which is shown as compliant. These levels are likely to apply to NCA02 and NCA03 Residential areas depending on plant in use and weather conditions. These levels are unacceptable.
EIS Appendix U - Noise Impact Assessment Section 4.2.1	The proposal is a speculative development with no tenants committed. The facility has been designed to accommodate typical data centre users. Table 23 uses example plant, not proposed plant. 'The exact requirements for all items of mechanical plant would be determined as the project progresses when specifics are known about tenant requirements.'	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis. No design for operational plant / machinery is available to inform this assessment. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** The noise impacts generated from the mechanical plant have not been sufficiently assessed as reporting only includes indicative noise levels for examples of typical plant and machinery, not the proposed detailed design plant. By using assumptions without detailed design, the noise assessment cannot accurately predict noise impacts and adherence with regulatory noise limits.

		Our enjoyment in living an indoor / outdoor lifestyle will be heavily disrupted.
EIS Appendix U - Noise Impact Assessment Roof Layout	The roof layout in Figure 11 (see *Figure 4* below) and Table 23 shows multiple point sources of noise with only acoustic louvres proposed to the east and south rooftops of the building. 'The design of the roof louvres, screens and parapets is indicative and will be reviewed during a later design stage of the project.'	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** The noise impacts generated from the mechanical plant have not been sufficiently assessed as reporting only includes indicative noise levels for examples of typical plant and machinery, and indicative design of roof louvres, screens and parapets, not the proposed detailed design plant. By using assumptions without detailed design, the noise assessment cannot accurately predict noise impacts and adherence with regulatory noise limits.
EIS Appendix U - Noise Impact Assessment Mechanical Plant	'Details regarding internal items of equipment are not currently available, however, breakout noise from these items is expected to be relatively minor compared to noise from externally located mechanical plant and testing of backup generators.'	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** Admission by the assessment that externally located plant and testing of backup generators will be extreme compared to internally located plant.
EIS Appendix U - Noise Impact Assessment 5.2.1 Predicted Construction Noise Levels	Table 32 show NCA03 Residential will be subject to multiple high and moderate noise exceedances during construction.	Fails to consider the close proximity of residential properties to this development. While construction is considered 'temporary' noise, proximity to residents with young families who utilise outdoor areas of their homes and the nearby Lane Cove West Public School, this level of disruption is not acceptable.
EIS Appendix U - Noise Impact Assessment	Table 33 shows NCA03 Residential complies with the Project Noise Trigger Levels while using 'example' plant, not proposed plant. For areas NCA01 and NCA02, night time	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to

5.3.1 Predicted Noise Levels	levels equal the noise criteria but is deemed as complying, and is only 2dBA less in NCA03.	this development and approval should not be granted on this basis. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** Table 35 Shows NCA01 residential area with predicted noise levels equalling the sleep disturbance screening level, which is shown as compliant. These levels are likely to apply to NCA02 and NCA03 Residential areas depending on plant in use and weather conditions. These levels are unacceptable.
EIS Appendix U - Noise Impact Assessment Table 38	Scheduling of generator testing: Preliminary noise modelling identified generator testing concurrent with heavy vehicle access and loading as a source of exceedance. Limiting generator testing to the daytime and scheduling testing around deliveries removes exceedances of the noise criteria.	48 generators are proposed, each requiring quarterly testing during business hours. This equates to testing one generator nearly every day for 30mins – 60mins. This will exceed the intrusive trigger levels, which are considered as 15 minutes of triggering noise. Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis. Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.**
EIS Appendix U - Noise Impact Assessment Appendix D – Operational Noise Contours	Predicted Operational Noise Contours – OP.02: Day + Generator Testing – 4.5m Height 	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis. This noise contour shows our residence would be subject to noise in order of 45-50dBA directly into our balcony and back doors of our house during generator testing and 35-40dBA during operations on the basis of survey information. Our enjoyment living an indoor / outdoor lifestyle will be heavily disrupted.
EIS Appendix U - Noise Impact Assessment	The report states that this data sheet should represent the noise reduction from inside the louvre to outside the louvre. The data sheet doesn't readily provide the information of noise reduction in decibels.	Inadequate assessment of actual noise impacts fails to consider the close proximity of residential properties to this development and approval should not be granted on this basis.

Appendix G Acoustic Louver data sheet		Testing has been undertaken using American requirements. What are the Australian requirements? Fails to demonstrate achievement of **SEARS Additional Assessment Criteria Operational Noise.** Evidence of louvres in the noise modelling is difficult to identify and interpret. Louvres only shield noise generated horizontally. No methodology has been identified that assesses vertically projected sound.

Figure 13 Indicative Screening on Rooftop – 3D View



Note 1: Pink is acoustic louvre screen to 6.5 m above the respective roof level. Green is solid wall to 6.5 m above the respective roof level.

Figure 4: Extract from Appendix U - Noise Impact Assessment

Cumulative and Other Concerns

Table 3: Cumulative impacts and other concerns		
Cumulative Noise Impacts.	Report includes accounting for potential cumulative impacts from the development and other sources of industrial noise in the area but does not use real design data to assess for the proposed development.	The report notes using an indicative 5dBA reduction in noise emissions to maximum assessable levels to account for adjoining industry noises. What evidence shows this reduction suitable for cumulative impacts of multiple data centres operating 24 / 7? This is unlikely to properly account for the nature of this type of industry.

Clustering of data centres	In addition to the already constructed AirTrunk data centre in Lane Cove West and the subject proposed development Project Mars SSD-82052708, there are currently an additional two proposed developments of data centres in this location currently in the planning portal. SSD-108835458 Mars Road Data Centre 3-4 Apollo Place and 87-91 Mars Road SSD-67407231 Apollo Place Data Centre 1 Sirius Road and 1 Apollo Place	There appears to be no strategic consideration by the developer or the NSW Government of the cumulative impact of clustering these projects in relatively high concentrations. The clustering of data centres in ensures that the risks (human health, environmental, security and cyber terrorism etc) posed by a single facility are significantly amplified.
Low-frequency continuous noise emissions	Inadequate research has been undertaken on the impact to humans of 24 hour low-frequency sounds.	The cumulative effect of multiple data centres using similar equipment to constant background noise is known to disrupt sleep, affect concentration, increase stress and impact learning and wellbeing.
Land value reduction	The desirability of our residence will be materially impacted due to proximity to these data centres.	The existing industry in the Lane Cove West Business Park is significantly different to the proposed development. Warehousing and office businesses are generally operated five days a week during daytime business hours. The 24/7 nature of a data centre, noise emissions and visual impacts will detrimentally affect future resale opportunities for ours and neighbouring residences. The lack of character assessment and impacts outside of the E4 zone to local residences is appalling.
Biodiversity and social impacts	We routinely see Australian native birds, reptiles, marsupials and monotremes around our residence, including possums, tawny frogmouths, kookaburras and red-belly black snakes. We have also seen echidnas and the endangered powerful owl. Blackman Park is an important recreational area for the locals of Lane Cove and wider communities including sporting clubs, local and other north-shore schools, bush care and others groups.	The proposed development will lead to the destruction of vegetation, habitat and ecosystems during the construction period and ongoing operations. The bushland connection through this area of Lane Cove to the Lane Cove River and nearby National Parks is important to the local community who cherish the recreational areas of Blackman Park and the Council run activities related to social well-being, bush care, Aboriginal connection and local flora and fauna. This development will fail to provide reasonable solar access to adjacent C2 Environmental Conservation zone,

		Community Nursery and existing vegetation.
EIS Section 6.11.3.1 EIS Appendix FF Dangerous Goods Report	The proposed development will store over 1 million litres of diesel for back-up generators in above ground tanks. The dangerous good report while referencing AS1940:2017, doesn't provide for how the design will meet the secondary containment requirements of 110% capacity of the above ground tanks.	Fails to demonstrate achievement of **SEARS Assessment Criteria 16 Hazards and Risks.** This amount of diesel is a hazard to the local environment, including the nearby Lane Cove Council Community Nursery, Blackman Park recreational areas and the Lane Cove River. An incident would severely reduce the amenity of this area for local residents.
NSW Government principles	NSW Data Centre Consulta□on Paper released by Infrastructure NSW on 27 March 2026.	This proposed development fails the five principles established for sustainable and equitable data centre investment. The Consultation Paper states 'noise and pollution impacts are more pronounced on these sites, particularly when multiple data centres are clustered in a single location in close proximity'.
EIS	Quality of planning assessment documentation including multiple errors, inconsistencies and omissions.	The EIS documentation cannot provide a reliable basis for consent.

<u>Summary</u>

I request clarification be provided for the proposed development using real data, including:

1. Assessment of visual impacts, with particular attention to the characterisation of and impact to the residences and communities to the nearby east and south.
2. Assessment of noise impacts, including installation of noise reduction mitigation measures to nearby residences.
3. Quantification and mitigation of cumulative impacts of the proposed and existing data centre facilities to human health and wellbeing. Mitigation is too heavily deferred to future stages of the proposed development.

I urge the Planning Authority to reject this application based on the extremely close proximity of our home and other sensitive receivers to the proposed facility outlined above and the multiple errors and omissions in the Environmental Impact Statement. I feel despondent knowing this is potentially in the future of our family, heavily disrupting our enjoyment living an indoor / outdoor lifestyle surrounded by nature and recreational areas.