

## Objection to Project Mars Data Centre (12 Mars Road)

I am writing to formally lodge my objection to the proposed Project Mars Data Centre. While data centres are a permitted use in E4 zones, this specific proposal represents a gross over-development of a boundary site that fails to respect the transition between industrial and sensitive residential land.

### 1. Flaws in the Noise and Vibration Impact Assessment

The Noise and Vibration Impact Assessment (SLR Consulting) is insufficient for a 24/7 industrial facility of this scale. My concerns include:

- **Contaminated Baseline Data:** The unattended noise monitoring (late 2024–early 2026) occurred while Interflow Pty Ltd was conducting extensive water infrastructure works nearby. The road cutting, digging, and heavy vehicle movements would have artificially inflated the "ambient" noise levels, making the data centre seem quieter by comparison.
- **Topographical Oversights:** Only one receiver (L03) was selected for Wood Street. Given the local terrain and the potential for noise amplification during temperature inversions—which are frequent near the Lane Cove River—additional receivers on the western side of Wood Street and further south are necessary for a representative study.
- **"Build First, Verify Later" Approach:** The EIS admits that mechanical plant and mitigation measures (like louvres) are "indicative" only. Recent reports regarding the nearby AirTrunk facility show it is already exceeding night-time limits by 11dB(A). We cannot rely on assumptions and "tenant requirements" when the facility is located less than 50m from homes.

### 2. Non-Compliance with E4 Zoning and Buffer Standards

The proposal ignores the core objectives of the E4 General Industrial zoning under the Lane Cove LEP 2009, specifically the requirement to mitigate conflict between industrial and residential uses.

- **Lack of Physical Separation:** Unlike other Sydney data centres separated by major arterial roads, 12 Mars Road sits directly on the boundary of R2 (Low Density Residential) and RE1 (Public Recreation) zones.
- **International Precedents:** While NSW lacks a specific buffer policy, other global jurisdictions mandate 200m–300m distances between data centres and homes to manage noise and cyber-physical risks. This proposal, placed within 50m of

residents and 160m of a Primary School, is a radical departure from safe planning.

### **3. Cumulative Impacts and Infrastructure Strain**

The clustering of up to four data centres in the Mars Road Business Park creates a "heat map" of risk that has not been strategically assessed:

- **Air Quality Impact:** The EIS admits that during a grid outage, the combined operation of diesel generators from Project Mars, AirTrunk, and Apollo Place could result in "significant cumulative air quality impacts." Notifying neighbours after the fact is not a mitigation strategy; it is a failure to protect the health of children at the nearby childcare centre and Lane Cove West Public School.
- **Community Burden:** Residents have already endured 18 months of construction noise for water upgrades to existing centres. The cumulative demand on local utilities and the resulting disruption to suburban streets like Banksia Close is becoming untenable.

### **4. Visual Amenity and Arboricultural Loss**

The Visual Impact Assessment (VIA) provides a misleadingly optimistic view of the project's scale:

- **Height Exceedance:** The development is cited at up to 33m—an 83% exceedance of the 18m limit.
- **Misleading Visuals:** The VIA relies on existing tree canopies to hide the building's bulk but fails to show the site after the proposed removal of 90 mature trees. Many of these are irreplaceable in the short-to-medium term (10+ years), meaning the visual "buffer" is largely illusory.
- **Ignored Perspectives:** The assessment neglects key community vantage points, including the Blackman Park skate park, tennis courts, and the primary pedestrian route for students at the corner of Avalon Ave and Banksia Close.

### **5. Cultural Insensitivity**

Finally, I wish to highlight the inappropriate comparison in the EIS between an energy-intensive 90MW industrial facility and the sustainable practices of the Cammeraygal people. Using the stewardship of traditional owners to justify a high-impact data centre is offensive and demonstrates a lack of genuine engagement with the site's heritage.

## **Conclusion**

*The extreme proximity of this facility to sensitive receivers makes 12 Mars Road an entirely inappropriate location for a project of this nature. The risks to human health, the certainty of noise pollution, and the breach of planning standards are too great to ignore. **I urge the Department to reject this proposal.***