

WILLOWTREE PLANNING



6 March 2026

REF: WTJ25-464

NSW Department of Planning, Housing and Infrastructure
Industry Assessments
Locked Bag 5022
Parramatta NSW 2124

Attention: Joanna Bakopanos

**RE: REQUEST FOR SEARS
PROPOSED CONSTRUCTION AND OPERATION OF DATA CENTRE
PROPERTY AT: 3-4 APOLLO PLACE AND 87-91 MARS ROAD, LANE COVE WEST
(LOT 8 DP241877, LOT 9 DP241877, LOT 100 DP622160 AND LOT 1 DP732557)**

Dear Joanna,

We write to the NSW Department of Planning, Housing and Infrastructure (DPHI) in support of a request for Secretary's Environmental Assessment Requirements (SEARs), under the Rapid Assessment Framework (RAF) to accompany a future State Significant Development Application (SSDA) 3-4 Apollo Place and 87-91 Mars Road, Lane Cove West (the Site). The Site encompasses the following land parcels:

- Lot 8 DP241877;
- Lot 9 DP241877;
- Lot 100 DP622160;
- Lot 1 DP732557; and
- Lot 1 DP1271404 (partial).

Consent is sought for the construction and operation of a new data centre on the Site, to be known as the Mars Road Data Centre, including associated infrastructure and servicing (the Proposal). The intent of the letter is to demonstrate that the Proposal is eligible for receiving SEARs.

The Site is located within the Lane Cove Local Government Area (LGA) and is zoned E4 General Industrial, pursuant to the *Lane Cove Local Environmental Plan 2009* (LCLEP2009). The Proposal is categorised as a data centre, which falls within the higher order land use definition of *light industries* which is permitted with consent in the E4 zone under the LCLEP2009. A data centre is also permitted with consent in the E4 zone under the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (the Transport and Infrastructure SEPP).

The Proposal seeks consent for a data centre with a total information technology (IT) load of approximately 140 megawatts (MW).

The Proposal satisfies the definition of state significant development pursuant to Chapter 2 and Schedule 1, Clause 25 of *State Environmental Planning Policy (Planning Systems) 2021* (the Planning Systems SEPP), being

- *development for the purpose of a data centre that has a total power consumption of more than the relevant amount of 15 megawatts.*

The preliminary architectural plan for the proposed scheme prepared by Greenbox Architecture is provided at **Appendix 1**.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

This letter provides an overview of the proposed development and the relevant planning framework that applies to enable the issuance of SEARs, which will then guide the preparation of a formal Environmental Impact Statement (EIS) for development of the Site.

The following sections provide an overview of Proposal to inform the NSW DPHI's decision making for the issuance of SEARs.

1.0 SITE DESCRIPTION

The Site is identified as 3-4 Apollo Place, and 87-91 Mars Road Lane Cove West, containing the following land holding(s):

TABLE 1. SITE IDENTIFICATION		
Site Addresses	Legal Description(s)	Land Area (approx.)
3 Apollo Place, Lane Cove West	Lot 8 DP241877	3,473.3m ²
4 Apollo Place, Lane Cove West	Lot 9 DP241877	1,289.5m ²
87 Mars Road, Lane Cove West	Lot 100 DP622160	2,428.2m ²
91 Mars Road, Lane Cove West	Lot 1 DP732557	7,852.9m ²
1 Sirius Road, Lane Cove West*	Lot 1 DP1271404	42,053m ²

* This lot will not form part of the Site upon lodgement of the EIS. Refer to **Section 4.0** below.

The Site comprises four (4) allotments as stated in **TABLE 1** above. The allotments are described as follows:

3 Apollo Place, Lane Cove West

The allotment is identified as Lot 8 DP241877 with a total approximate area of 3473.3m². It is irregular in shape with a curved front boundary alignment. The allotment has a street frontage of 23.08m. The existing building located on the allotment fronts the west on Apollo Place where existing pedestrian accessways are positioned as well as two (2) driveway crossovers for car park level access and access to the loading dock. Topographically, the allotment entails a moderate slope of approximately 4m from the northern boundary towards the southern boundary. Refer to **Figure 1** below.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West



Figure 1. Aerial Map of 3 Apollo Place (Source: NSW Planning Portal, 2025)

4 Apollo Place, Lane Cove West

The eastern adjoining allotment is identified as 4 Apollo Place, Lane Cove, and is formally identified as Lot 9 DP241877. The allotment comprises total area of 1,289.5m². It is irregular in shape at the northern section, with an undulating street front boundary, whereas the body and southern section of the Site is generally rectangular. The allotment hosts an industrial building with ancillary Office Premises and covers a large percentage of the total area. Two (2) vehicle crossovers adjoin the road at the northern boundary, with the eastern crossover providing access to the rear section of the allotment. A moderate slope in the topography carries from the southeastern corner to the northwestern corner. This decline ceases at the western boundary, where a large retaining wall is present to the adjoining lot at 3 Apollo Place. Refer to Figure 2 below.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

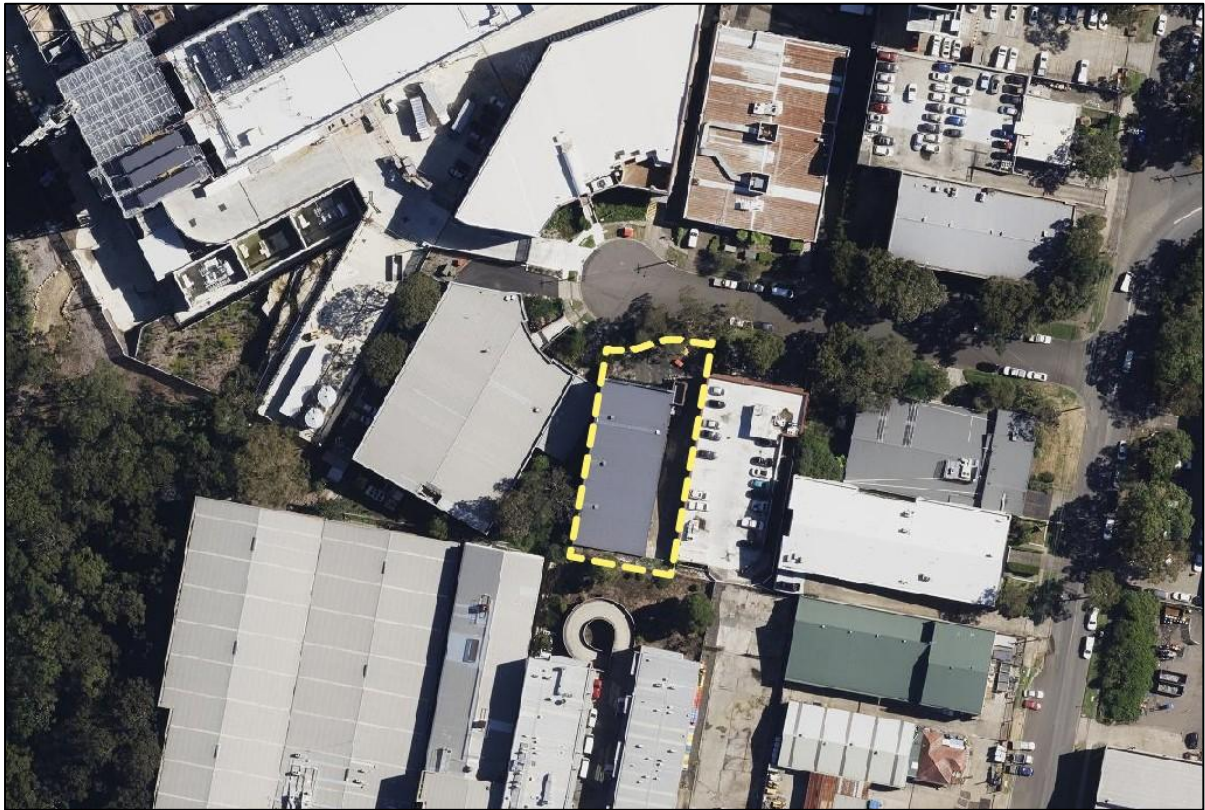


Figure 2. Aerial Map of 4 Apollo Place (Source: NSW Planning Portal, 2025)

87 Mars Road, Lane Cove West

The southeastern allotment is identified as 87 Mars Road and is formally recognised as Lot 100 DP622160. The allotment comprises a total approximate area of 2,428.2m² and is generally rectangular in shape. The street front boundary is located at the southern section of the allotment with a total width of 21m. A single driveway crossover adjoins with Mars Road, providing pedestrian and vehicular access. The existing building on the allotment is identified as a Recreational Facility (indoor) with ancillary Food and Drinks Premises. The topography of the allotment encompasses a steep slope from the southern boundary, which is presented at street level, to the northern boundary which adjoins 4 Apollo Place. Refer to **Figure 3** below.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

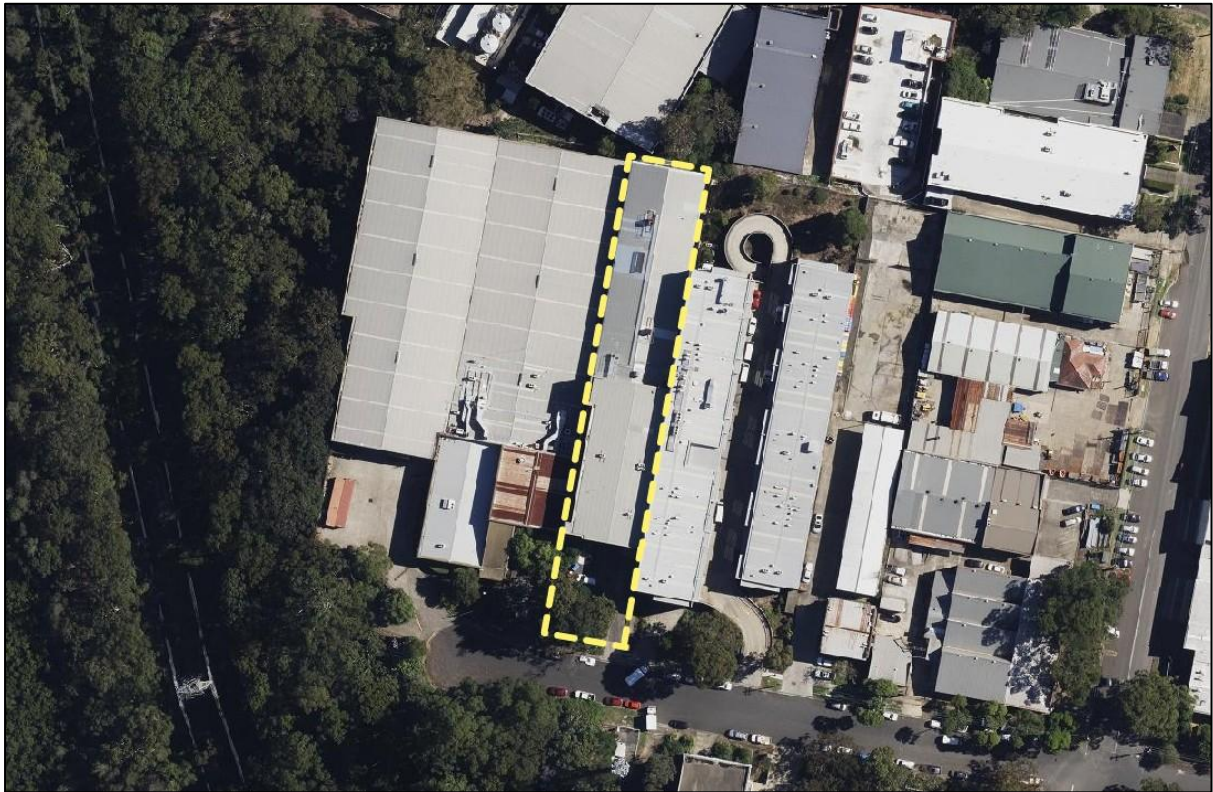


Figure 3. Aerial Map of 87 Mars Road (Source: NSW Planning Portal, 2025)

91 Mars Road, Lane Cove West

The southwestern allotment is known as 91 Mars Road, Lane Cove, formally identified as Lot 1 DP732557. The allotment comprises a total area of 7,852.9m² and is generally rectangular in shape with a small boundary deviation at the northwestern section. The allotment hosts a large industrial building with a concrete hardstand area that provides vehicle ingress/egress and parking. The ingress/egress routes are split between two (2) points, the lower being access for general parking and the street level being for general industrial purposes. Access to both ingress/egress routes is achieved via a crossover that connects to the cul-de-sac of Mars Road. The existing topography is generally flat given the predominance of the allotment is covered by built form. It is highlighted that the adjoining allotment immediately west entails a steep topographical decline from east to west. Refer to Figure 4 below.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

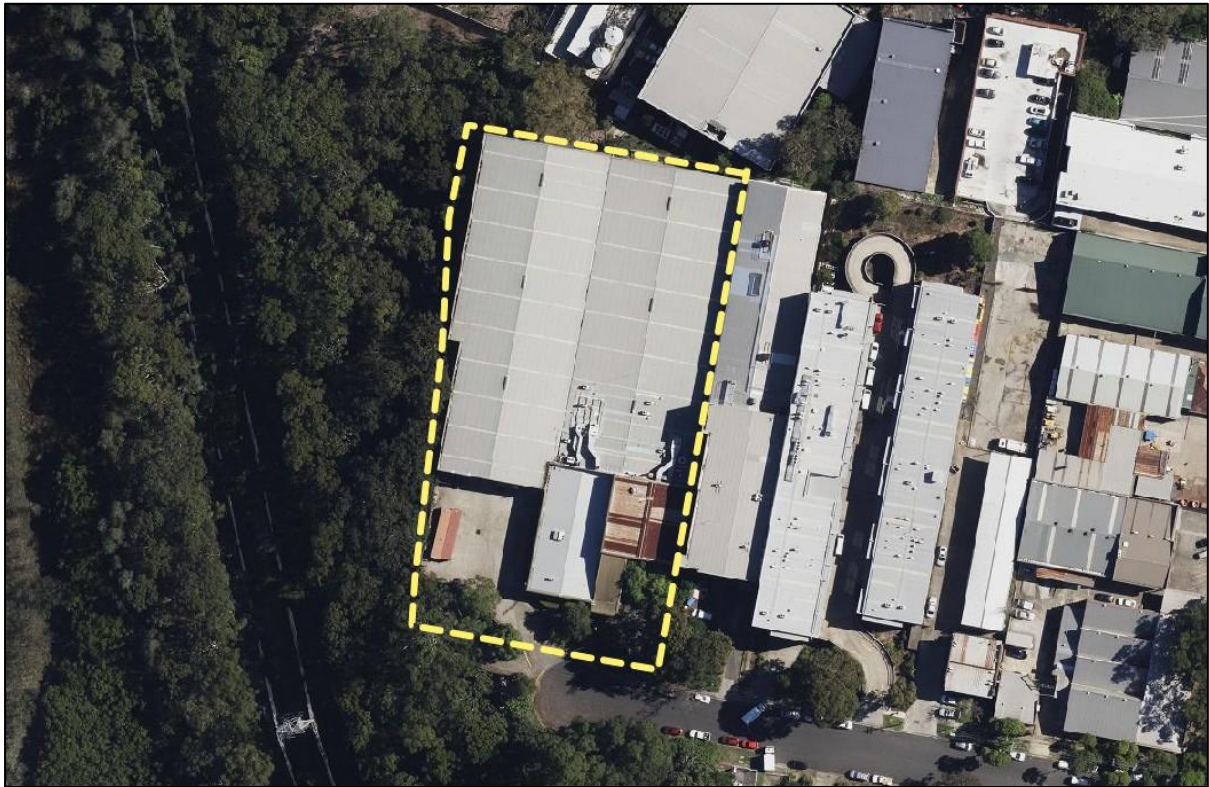


Figure 4. Aerial Map of 91 Mars Road (Source: NSW Planning Portal, 2025)

1 Sirius Road, Lane Cove West

A portion of the Site currently resides within the existing Lot 1 DP1271404. It is irregular in shape and comprises an area of approximately 42,053m². It contains two (2) SSD approvals comprising:

- SSD-9741: Lane Cove West Data Centre
- SSD-67407231: Apollo Place Data Centre

This Lot contains ingress and egress points on both Apollo Place and Sirius Road. Through ongoing development of the above SSDs, the topography of the site is generally flat. As identified within **Section 4.0**, this subject lot will not be required to form part of the Site at the time of EIS lodgement. Future development proposed on the Site will operate independently to both the Lane Cove West and Apollo Place Data Centres.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West



Figure 5. Aerial Map of 1 Sirius Road (Source: NSW Planning Portal, 2025)

2.1 SITE CONTEXT

The Site is located in a commercial/industrial area in Lane Cove West and lies at the north-western end of Apollo Place. Surrounding land uses include:

- North: Lane Cove West Data Centre and Apollo Place Data Centre, with bushland and Stringybark Creek (Lane Cove River tributary) located approximately 135m to the north of the Site;
- East: Commercial buildings immediately east of the Site, followed by Sirius Road, a laboratory, a swimming school and other commercial properties;
- South: Bushland.
- West: Bushland and Lane Cove River located approximately 250m to the west of the Site. Land surrounding the Site comprises a C2 zone pursuant to LCLEP 2009.

The nearest sensitive land use is within the C2 Environmental Conservation zone (Lane Cove National Park), located approximately 500m to the west of the Site, containing Bushfire Prone Land, Riparian Lands and Watercourses and Coastal Wetlands and Proximity Area for Coastal Wetlands. The closest residential suburbs are approximately 600m west (East Ryde) and 600m east (Lane Cove West) of the Site. Refer to **Figure 6** below.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West



Figure 6. Site Context Map (Source: Nearmap, 2025)

Key contextual attributes of the Site are noted as follows:

- The Site is situated within the Lane Cove Local Government Area (LGA) and is located approximately 8km northwest of the Sydney CBD and 12km east of the Parramatta CBD;
- Apollo Place adjoins the Site to the south and Sirius Road adjoins the Site to the east, linking to the wider Lane Cove West Business Park further east and south;
- Directly to the west of the Broader Site is interspersed vegetation classed as bushfire prone land, whilst further west includes tributaries such as the Lane Cove River and Stringybark Creek, which meander to the north-west of the Site;
- Given the strategic location of the Site being positioned within the Lane Cove West Business Park, which is designated for such industrial-related uses, the Proposal represents a logical outcome that would provide employment-generating opportunities close to where people live and nearby to available transport infrastructure routes;
- The surrounding regional road network includes the M2 Motorway and Epping Road, providing enhanced connectivity to the Site and surrounding area; and
- Public transport is facilitated by various nearby bus stops along Sirius Road, connecting the Site to Lane Cove and the Sydney CBD.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

2.0 DEVELOPMENT HISTORY

TABLE 2 outlined below provides a summary of the publicly available DAs pertaining to the Site.

TABLE 2. EXISTING CONSENTS		
DA Reference	Summary	Approval Date
3 Apollo Place		
89/2016	Alterations and additions, new facade cladding, new loading dock	01/07/2016
89/2016 Modification	- s96 Modification of consent - Minor changes to parking, roof &	23/07/2017
87 Mars Road		
75/2000	Change of use to a Theatrette and general internal fit out works.	No approval date available.
51/2023	Change of use to a Recreational Facility (indoor).	05/06/2023
51/2023 Modification	- Addition of Takeaway Food and Drinks Premises.	25/03/2024
112/2025	Internal fit out works for Recreational Facility (indoor)	10/10/2025
91 Mars Road		
271/2004	Proposed development of business identification signage.	15/09/2004

3.0 PROPONENT DETAILS

The Proponent for this Proposal is as per **TABLE 3** below

TABLE 3: PROPONENT CONTACT DETAILS	
Company Details	Willowtree Planning Suite 404, Level 4, 165 Walker Street North Sydney NSW 2060
Contact Name	Theo Klok
Position	Senior Planner
Contact Number	0458 458 608
Email Address	tklok@willowtp.com.au

4.0 PROJECT DETAILS

The Proposal will seek development consent for the construction and operation of a data centre, including necessary servicing. The current preliminary Proposal plan, prepared by Greenbox Architecture is included within **Appendix 1**. The particulars of this Proposal are summarised below:

- Demolition of existing buildings and associated infrastructure on the Site;
- Consolidation of four (4) existing allotments (3-4 Apollo Place and 87-91 Apollo Place)
- Use of the Site as a Data Centre;
- Site preparation works to establish developable area;
- Construction of a Data Centre; and
- Construction of associated infrastructure and landscaping.

The proposed development includes those works as identified in **TABLE 2** below.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

TABLE 4: DEVELOPMENT PARTICULARS	
Component	Particular
Site Area	15,044m ² approx.
Gross Floor Area	13,800.5m ² approx.
Floor Space Ratio	0.92:1
Total IT Load	140MW
Storeys	5 storeys of data halls, with roof plant located above.
Building Height	37.4m
New Roads	10m-wide driveway to connect to internal parking lots 8m-wide driveway connecting Apollo Place and Mars Road
Landscaped Area (Deep Soil)	3,409m ² approx.
Back-Up Generators	Approx 120 generators for emergency stand-by purposes. Generator testing will not exceed 200hrs.
Dangerous Goods	Diesel storage less than 2000T, Lithium Batteries for UPS
Estimated Jobs	To be determined.

Figure 3 to Figure 5 below include an excerpt of the Concept Plans prepared by Greenbox Architecture (refer to **Appendix 1**).

Upon lodgement of the EIS, the Lot currently known as 1 Sirius Road shall not form part of the Site., This is the result of a boundary alignment which is to be registered prior to the lodgement. Additionally, the remnant four (4) lots shall be consolidated concurrently. The following steps are proposed to occur to achieve this outcome.

- Preparation and registration of the plan of consolidation, inclusive of the following steps:
 - Preparation of plan (2 weeks total);
 - Pre-examination from NSW Land Registry Services (LRS) following completion of plan;
 - Undertaking of landowner execution;
 - Lessee consent as necessary;
 - LRS registration (3-4 days);
- Preparation of plan of subdivision, inclusive of:
 - Preparation of plan in tandem with plan of consolidation;
 - Pre-examination from NSW LRS following completion of plan;
 - Undertaking of landowner execution;
 - Lessee consent as necessary;
 - Submission of application for subdivision certificate once the consolidation plan is registered
 - Consultation with Sydney Water will be undertaken to confirm each lot is services by water and sewer.
 - LRS registration (3-4 days);

The bounds of the proposed development remain generally in alignment with the Architectural Plans within **Appendix 1**, with changes to Lots being the sole change prior to lodgement of the EIS. The purpose of the boundary adjustment as specified above is to ensure that the project footprint remains within a singular, consolidated Lot upon lodgement of the EIS.



REQUEST FOR SEARS
Proposed Data Centre
3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

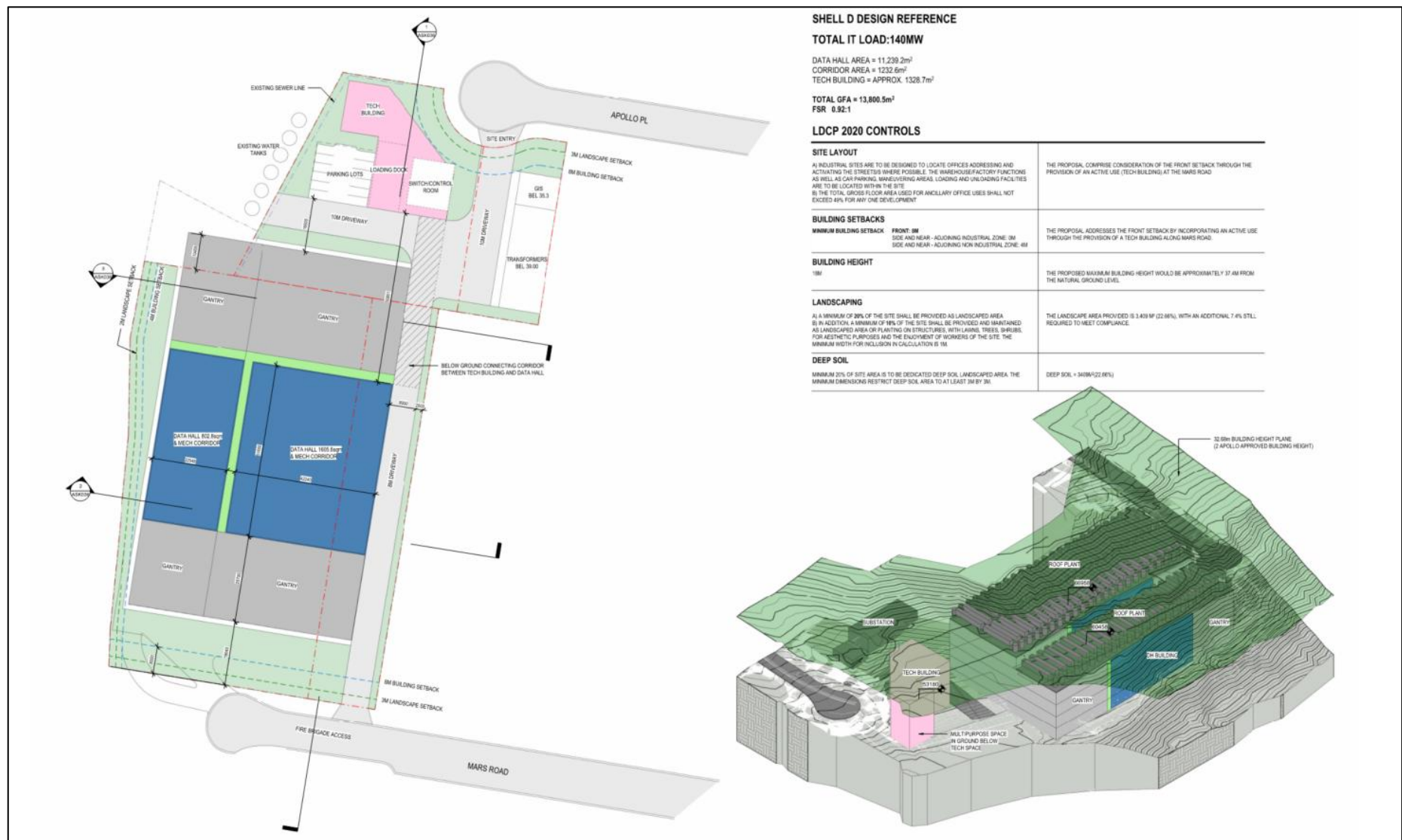


Figure 7. Concept Masterplan (Source: Greenbox Architecture, 2026)

REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

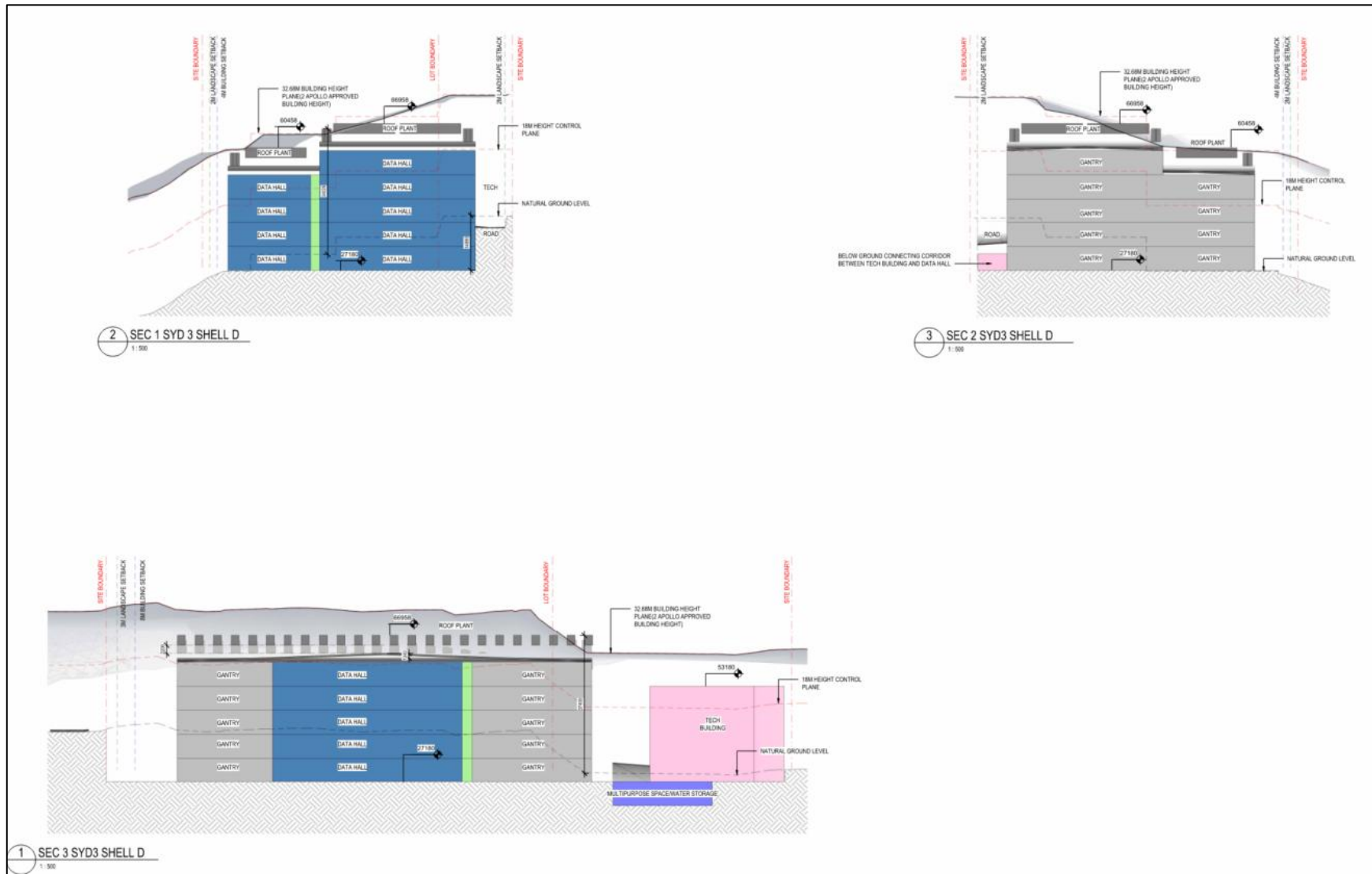


Figure 8. Concept Sections (Source: Greenbox Architecture, 2026)



5.0 STATUTORY CONTEXT

This section sets out the statutory planning framework and controls relevant to the Proposal.

The following statutes, strategic plans and policies have been considered as part of the development planning phase:

Commonwealth Planning:

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

State Planning:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Biodiversity Conservation Act 2016*
- *Rural Fires Act 1997*
- *Protection of the Environment Operations Act 1997*
- *Water Management Act 2000*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*

Local Planning:

- *Lane Cove Local Environmental Plan 2009*
- *Lane Cove Development Control Plan 2010*

Strategic Context

- *Greater Sydney Regional Plan*
- *North District Plan*
- *Lane Cove Local Strategic Planning Statement 2020*

5.1 Environment Protection and Biodiversity Conservation Act 1999

Under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species) must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval at a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a “controlled action” and formal Commonwealth approval is required.

The requirements of the EPBC Act will be considered as part of the forthcoming EIS.

5.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing statute for all development in NSW. Pursuant to Part 4 of the EP&A Act, the Proposal is considered SSD under the Planning Systems SEPP.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

5.2.1 Section 4.15(1) of the EP&A Act 1979

Section 4.15(1) of the EP&A Act specifies the matters, that a consent authority must consider when determining a DA. The forthcoming EIS will consider and address all matters outlined in Section 4.15 of the EP&A Act.

5.3 Environmental Planning and Assessment Regulation 2021

5.3.1 Section 7 – Designated Development

Section 7(1) of the EP&A Regulation states that:

“Development described in Schedule 3, Part 2 is declared to be designated development unless it is not designated development under Schedule 3, Part 3.”

The Proposal does not trigger Designated Development pursuant to Schedule 3 of the EP&A Regulation.

5.4 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seek to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the EP&A Act.

Pursuant to Section 7.2(1) of the BC Act, development or an activity is likely to significantly affect threatened species if:

- (a) *it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) *the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) *it is carried out in a declared area of outstanding biodiversity value.*

Pursuant to Section 7.9 of the BC Act, an SSD is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

A Biodiversity Development Assessment Report (BDAR) or BDAR waiver will be prepared to accompany the EIS.

5.5 Rural Fires Act 1997

The Rural Fires Act seek to ensure that development does not increase the risk of bushfire attack or increase risk to human life, property or other assets. The Site is identified as containing Vegetation Buffer areas. The Proposal will be designed to allow for appropriate Asset Protection Zones and be constructed in accordance with the relevant requirements as necessary.

The SSDA will therefore be referred to the NSW RFS for comment.



5.6 Protection of the Environment Operations Act 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an ‘activity’ for the purposes of the POEO Act is:

“an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).”

Clause 9 – Chemical storage

Under the POEO Act, Schedule 1, Clause 9(1) ‘general chemicals storage’, which would include storage of any chemicals, diesel fuel or radioactive substances, is a Scheduled Activity. Capacity to store greater than 20 tonnes (pressurised gases), 200 tonnes (liquefied gases) or 2,000 tonnes (chemicals in any other form) requires an EPL from the NSW EPA.

The Proposal will not exceed the 2,000-tonne threshold on site. Consideration of chemical storage will be included in the EIS.

Clause 17 – Electricity generation

Electricity generation is a premises-based scheduled activity. However, pursuant to Clause 17(1A), this clause does not apply to the generation of electricity by means of electricity plant that is emergency stand-by plant operating for less than 200 hours per year.

It is understood that the stand-by generators will not be used for more than 200 hours per year and therefore no further consideration is required. This will be addressed in the EIS.

5.7 State Environmental Planning Policy (Planning Systems) 2021

Schedule 1 of the Planning Systems SEPP includes provisions for developments to be undertaken as SSD. Clause 25, Schedule 1 is relevant to the proposed development:

25 Data centres

- (1) *Development for the purpose of data centres that has a total power consumption of more than the relevant amount.*
- (1A) *Subsection (1) does not apply to development on land within the area of the City of Sydney.*
- (2) *In this section—*
 - relevant amount** means—
 - (a) *for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—10 megawatts, or*
 - (b) *for any other development—15 megawatts.*

The data centre will have a total power consumption up to 140MW and thus the SSD provisions apply.

5.8 State Environmental Planning Policy (Transport and Infrastructure) 2021

The Transport and Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across NSW.

The following parts of the Transport and Infrastructure SEPP are relevant to the Proposal.



5.8.1 Data Centres

The Site is zoned E4 General Industrial, which is a prescribed zone under Division 3, Clause 2.31 of the Transport and Infrastructure SEPP. Clause 2.31 states that development for the purpose of a data centre may be carried out by any person with consent on a prescribed zone. As such the proposed development is permissible with consent subject to the provision of the Transport and Infrastructure SEPP.

5.8.2 Electricity generating works

Clause 2.36(2) prescribes that development for the purpose of a back-up electricity generating plant that operates for not more than 200 hours in any year may be carried out by any person with consent on any land.

5.8.3 Traffic generating development

Schedule 3 of the Transport and Infrastructure SEPP lists the types of development that are defined as Traffic Generating Development.

The applicable trigger for traffic generating development for industrial development is 20,000m² in site area or (if the site area is less than the gross floor area) gross floor area.

The forthcoming EIS will be supported by a robust transport and traffic impact assessment.

5.10 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to:

- management of hazardous and offensive development.
- remediation of contaminated land and to minimise the risk of harm.

In relation to the Site, the following matters are highlighted.

5.10.1 Coastal management

The site contains areas of mapped proximity area for coastal wetlands which will be assessed in relevant reporting as necessary.

5.10.2 Hazardous and offensive development

A preliminary risk screening will be completed in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 and 'Applying SEPP 33 Guidelines', that includes a clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials associated with the development will be prepared for the proposal.

Additionally, a Preliminary Hazard Analysis (PHA) will be prepared in accordance with the Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment, as prepared by the former Department of Planning. Should the preliminary risk screening indicate that the project is "potentially hazardous". Relevant aspects of the FM Global Property Loss

REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

Prevention Data Sheet 5-32 – Data Centres and Related Facilities will also be considered and implemented where appropriate as part of the development.

5.10.3 Remediation of land

Under Chapter 4 of the Resilience and Hazards SEPP, where a DA is made, the consent authority must not grant consent unless:

- (a) *it has considered whether the land is contaminated, and*
- (b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

A Preliminary Site Investigation will form part of the forthcoming EIS. It is noted that the site assessment will be thoroughly reviewed, and a Detailed Site Investigation and Remedial Action Plan may be required depending on the outcomes of the site assessment outcomes.

5.11 Lane Cove Local Environmental Plan 2009

The Site is zoned E4 General Industrial under the provisions of LCLEP2009. **Figure 9** below provides a representation of the Site and surrounding land zoning under the LCLEP2009.

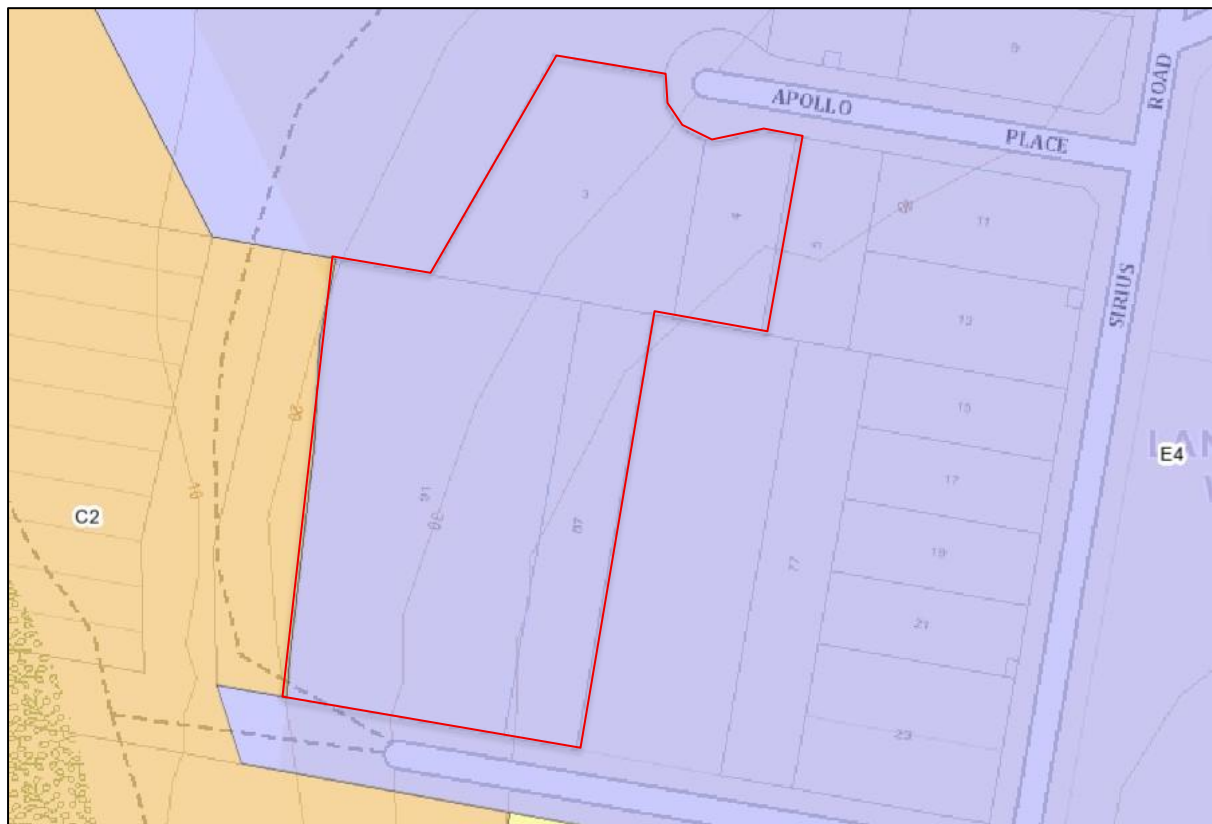


Figure 9. LEP Land Use Zones (Source: NSW Planning Portal, 2025)

REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

5.11.1 Land use

Under the LCLEP2009 the Proposal would be considered a data centre which is defined as follows:

data centre means a building or place the principal purpose of which is to collect, distribute, process or store electronic data using information technology.

Note—

Data centres are a type of **high technology industry**—see the definition of that term in this Dictionary.

5.11.2 Permissibility

The land use table for the E4 zone pursuant to LCLEP2009 is reproduced below:

The objectives of the E4 zone include:

- *To provide a range of industrial, warehouse, logistics and related land uses.*
- *To ensure the efficient and viable use of land for industrial uses.*
- *To minimise any adverse effect of industry on other land uses.*
- *To encourage employment opportunities.*
- *To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.*
- *To provide support for innovative technologies and creative industries.*
- *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.*

Within the E4 zone, the following development is permitted without consent:

- Nil

Within the E4 zone, the following development is permitted with consent:

- *Car parks; Centre-based child care facilities; Community facilities; Depots; Food and drink premises; Freight transport facilities; Garden centres; General industries; Goods repair and reuse premises; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; **Light industries**; Local distribution premises; Medical centres; Neighbourhood shops; Oyster aquaculture; Places of public worship; Recreation areas; Recreation facilities (indoor); Respite day care centres; Roads; Self-storage units; Sex services premises; Signage; Take away food and drink premises; Tank-based aquaculture; Vehicle body repair workshops; Vehicle repair stations; Vehicle sales or hire premises; Warehouse or distribution centres*

Within the E4 zone, the following development is prohibited:

- Any development not specified in item 2 or 3

High technology industries are a type of light industry which are permitted with consent in the E4 zone pursuant to LCLEP2009 and the Transport and Infrastructure SEPP.

5.11.3 Development Standards

TABLE 5 outlines the developments consistency and compliance with the relevant development standards and controls under LCLEP2009.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

TABLE 5. DEVELOPMENT STANDARDS

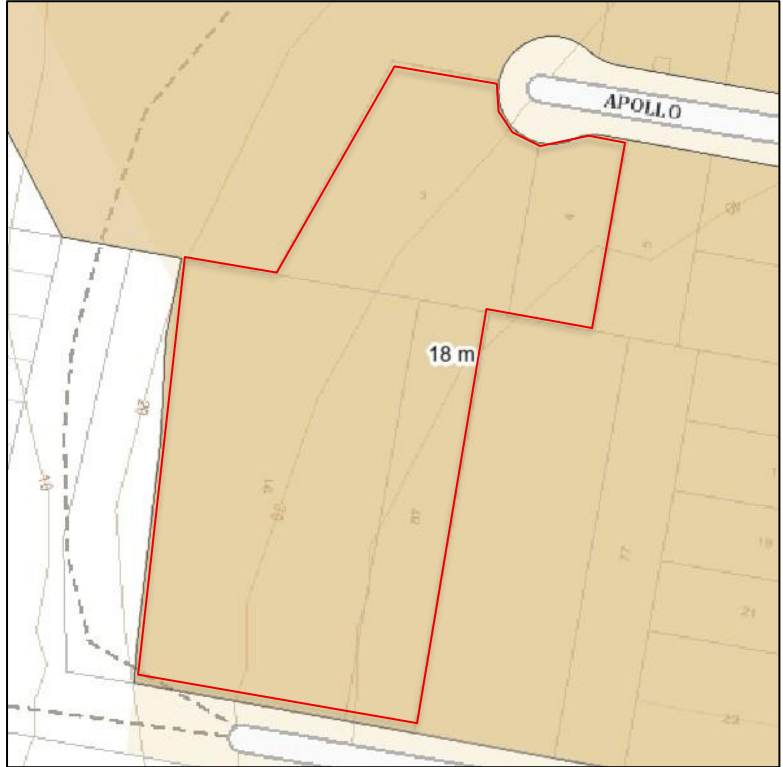
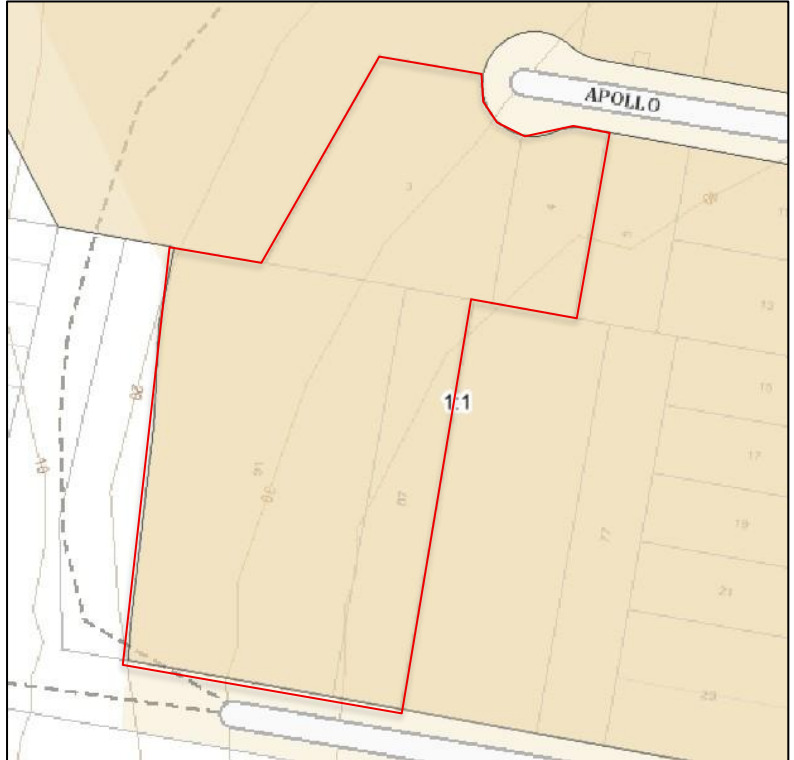
Clause	Comment
Clause 4.1 – Minimum Lot Size	The Site is not subject to a minimum lot size pursuant to the LCLEP2009.
Clause 4.3 – Height of Buildings	The Site is subject to a maximum building height of 18m pursuant to the LCLEP2009.  Figure 10. Height of Building Map (Source: NSW Planning Portal, 2025) Currently, It is relevant to note that there are significant changes in levels across the site, with the natural ground level (NGL) changing of approximately 20m in a downward slope from east to west across the site. As such, this results in differing in an overall height from ground level for proposed development to the highest point across the site. Of comparison, the Apollo Place Data Centre (SSD-67407231) comprised a maximum building height of 32.68m. Additionally, the Lane Cove West Data Centre (currently SSD-9741-Mod-4) exceeded Clause 4.3 of LCLEP. Notwithstanding, a Clause 4.6 variation will be submitted alongside to justify the exceedance to the height threshold, and will demonstrate that the development: ▪ Allows for reasonable solar access to existing buildings and public areas,



TABLE 5. DEVELOPMENT STANDARDS

Clause	Comment
	- Ensures that privacy and visual impacts of development on neighbouring properties, particularly where zones meet, are reasonable, - Relates to the development to topography and existing streetscape. A Clause 4.6 Variation Request shall be undertaken instead of an amendment to LCLEP2009. This is justified on the basis of the site-specific conditions, being the steep topography of the Site. This ensures that future sentiments of compliance being 'unreasonable' or 'unnecessary' can be adequately addressed and justified in the EIS stage. Further, this ensures that such a variation is tied to the SSDA only. This ensures a precedence for other forms of development is not set that would permit other forms of development on the Site in future which may benefit from increased building height without the requirement to provide justification.
Clause 4.4 – Floor Space Ratio	The Site is subject to a maximum Floor Space Ratio (FSR) of 1:1 pursuant to the LCLEP2009. The proposed development currently complies with this control.  Figure 11. Floor Space Ratio Map (Source: NSW Planning Portal, 2025)
Clause 4.6 – Exceptions to development standards	A Variation Request that addresses the relevant requirements of Clause 4.6 and the relevant case law will be submitted in support of the Proposal, with regard to height of building.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

TABLE 5. DEVELOPMENT STANDARDS

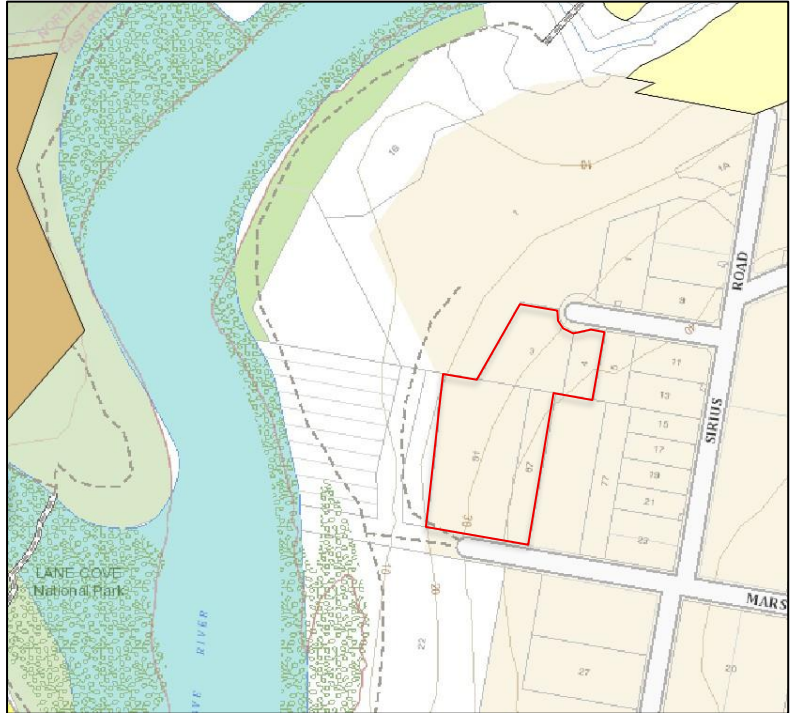
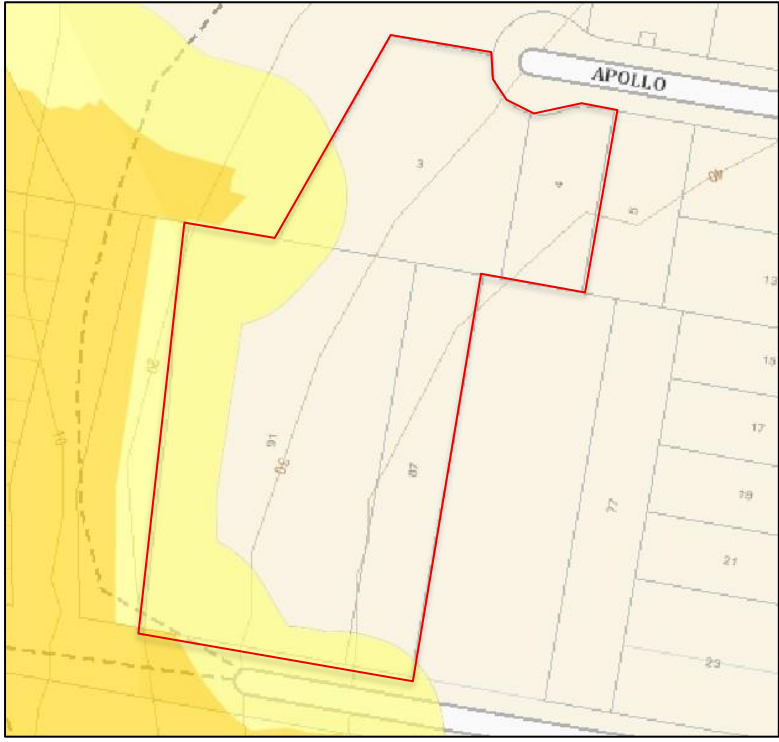
Clause	Comment
	As will be explored and contested in greater detail in a future Variation Request, a major element of the justification presented for the proposed building height relates to the need to adequately accommodate the extensive mechanical engineering infrastructure and specialised functional requirements that are said to be essential to the safe, efficient, and effective operation of a hyperscale data centre facility of this type. Future justification will also ensure that it is adequately demonstrated that the proposed building height is consistent with, and reflective of, the scale and form of data centre developments that have been approved and constructed across the Sydney metropolitan region.
Clause 5.10 – Heritage	The Site is not identified as containing a heritage item, nor is it located within a Heritage Conservation Area (HCA) pursuant to the LCLEP2009. Notwithstanding, three (3) heritage items exist in the vicinity of the Site.  Figure 12. Heritage Map (Source: NSW Planning Portal, 2025) These three (3) items are identified as follows: ▪ <i>Boobajool Reserve (open space) Significance: Local;</i> ▪ <i>Cumberland Paper Mills, Epping Road Significance: Local; and</i> ▪ <i>Chicago Mills, 160 Epping Road Significance: Local.</i>
Clause 5.11 – Bushfire Hazard Reduction	The Site is identified as being partially located within the vegetation buffer zone.



TABLE 5. DEVELOPMENT STANDARDS

Clause	Comment
	 Figure 13. Bushfire Prone Land Map (Source: NSW Planning Portal, 2025) The buffer zone affectation is limited to the western allotments, specifically Lot 8 DP241877, Lot 100 DP622160 and Lot 1 DP732557. Notwithstanding, sections of the Vegetation Category 2 zone are mapped as adjoining the boundary of the Site at the southwestern and northwestern section of Lot 1 DP732557. The Proposal is categorised by the NSW Rural Fire Service (NSW RFS) planning policy document Planning for Bush Fire Protection 2019 (PBP) as 'other non-residential development', and more specifically 'commercial and industrial development'.
Clause 5.21 – Flood Planning	The Site is not identified as being impacted by flood planning provisions pursuant to the LCLEP2009.
Clause 6.1 – Acid Sulfate Soils	The Site is not subject to any Class 1 or Class 2 acid sulfate soils pursuant to the LCLEP2009. However, it is noted that the western adjoining allotments are identified as containing Class 5 acid sulfate soils.

REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

TABLE 5. DEVELOPMENT STANDARDS

Clause	Comment

6.0 OTHER APPROVALS/COMMENTS

Pursuant to Section 138 of the *Roads Act 1993*, consent from the appropriate roads authority will be required to carry out works in a public road – this would include works associated with the provision of the Site's vehicular access.

7.0 INITIAL ASSESSMENT OF IMPACTS

7.1 Ecological Impacts

A BDAR or BDAR waiver will be prepared to accompany the EIS, in alignment with Section 7.9 of the BC Act. Particular consideration is acknowledged to be required to be given to Lane Cove National Park (LCNP). Initial investigation has identified no significant impediments to the development of the site exist from an ecological standpoint.

7.2 Hazard and Risk

As per **TABLE 4**, the development is currently proposed to have approximately 120 generators for emergency stand-by-purposes. Generator testing will not exceed 200hrs. The diesel storage requirements for site will not exceed the 2000t threshold. An Environment Protection Licence pursuant to Schedule 1 of POEO Act is not required as generator testing and petroleum storage thresholds are not exceeded, as identified within **Section 5.6**.

A preliminary risk screening will be completed in accordance with *State Environmental Planning Policy (Resilience and Hazards) 2021* and Applying SEPP 33 Guidelines (DoP, 2011), that includes a clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials associated with the development will be prepared for the proposal.

Additionally, a Preliminary Hazard Analysis (PHA) will be prepared in accordance with the Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011), should the preliminary risk screening indicate that the project is “potentially hazardous”. Relevant aspects of the FM Global Property Loss Prevention Data Sheet 5-32 – Data Centres and Related Facilities will also be considered and implemented where appropriate as part of the development.

7.3 Acoustic Impacts

A detailed Noise and Vibration Impact Assessment (NVIA) will be undertaken to accompany the EIS with quantitative noise assessments undertaken for both the construction and operational phases of the project to assess noise and vibration impacts (including testing of any back-up power system) on nearby sensitive receivers and structures.

Operational noise emissions to be assessed using the EPA *Noise Policy for Industry* (NPfI), road traffic noise (construction and operational) are to be assessed in accordance with the EPA *Road Noise Policy* (RNP), construction noise would be assessed in accordance with the EPA *Interim Construction Noise Guideline* (ICNG).

Construction vibration would be assessed in accordance with the *NSW Environmental Noise Management Assessing Vibration: A Technical Guideline* (AVTG) for human annoyance, and British Standard BS 7385 Part 2 and German Standard DIN 4150 Part 3 to consider the potential for cosmetic damage to surrounding building structures.

Noise sources to be considered during the NVIA include rooftop chillers, transformers, generators, load banks, substation transformers, noise breakout from facades/openings, and on-site vehicle movements. Where any exceedances of the project noise trigger levels are identified, reasonable and feasible noise mitigation measures would be considered and incorporated into the design noise modelling.



7.4 Visual Impacts

Initial assessments have been undertaken, with draft photomontages undertaken from a viewpoint within Magdala Park, in the locality of North Ryde (refer to **Appendix 2**).



Figure 15. Draft Photomontage of the Development from Magdala Park (Source: Greenbox, 2026)

External finishes and materials shall be sympathetic to the surrounding environment, including LCNP. These include grey and green colours, avoiding incongruous development. Refer to **Figure 16** below.

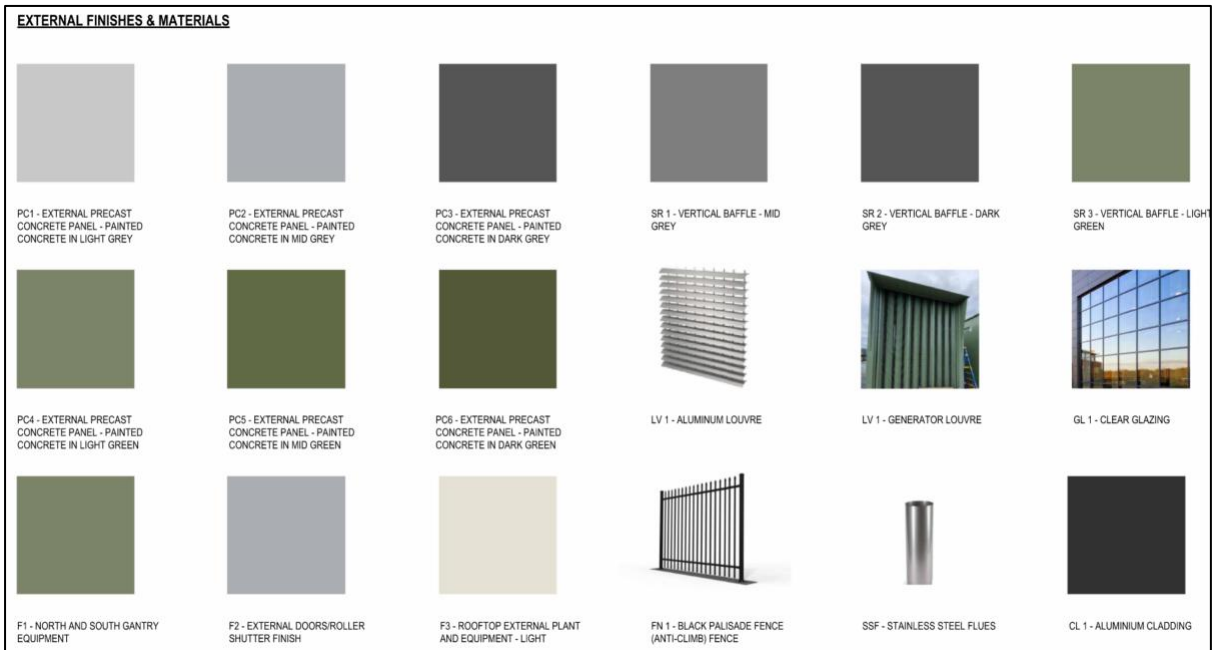


Figure 16. Concept Finishes and Materials (Source: Greenbox, 2026)



To accompany the EIS, the Proposal will be informed by finalised photomontages and perspective drawings, where necessary, and include a Visual Impact Assessment.

7.5 Servicing

Electricity

Connection to the AusGrid Lane Cove 1 Subtransmission and Switching Station, to the south of the site is required to facilitate the development, which will connect to an on-site substation located on the north side of the subject site. This likely includes a connection to 2 x 132kV feeders within the Switching Station and underground conduits from the Switching Station along Sirius Road and Apollo Place to the site.

Water

A feasibility application to Sydney Water was submitted in January 2026. A response from Sydney Water on the feasibility application is required to confirm if an options assessment will need to be undertaken. Ongoing consultation with Sydney Water is occurring.

Telecommunications

The project site is well located with respect to existing telecommunications infrastructure, providing a high level of connectivity essential for the reliable and efficient operation of a contemporary data centre. Preliminary investigations confirm that the locality is serviced by multiple major telecommunications carriers, including fibre backhaul routes and diverse network corridors. This enables the project to achieve the necessary levels of redundancy, capacity, and resilience required for mission-critical digital operations.

7.6 Bushfire Impacts

The site and surrounding area are identified as bushfire-prone land. The Proposal will require a detailed Bushfire Hazard Assessment, focusing on pathways to satisfy the aim and objectives of Planning for Bush Fire Protection.

8.0 INDUSTRY-SPECIFIC SEARS

This section reviews the relevant criteria and includes commentary on how the Proponent intends to respond to each item, where applicable. The industry-specific SEARs for data storage centres has been utilised as a base case. Refer to **TABLE 6** below.

TABLE 6: INDUSTRY-SPECIFIC SEARS		
Issue and Assessment Requirements	Documentation	Proponent Comments
1. Statutory Context - Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines. - Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. - Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including	Address in EIS.	The EIS will address the requirement of this item.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

any components that were not SSD) and provide a justification for any differences • Address the requirements of any approvals applying to the site, including any concept approval, any endorsed or draft master plan, precinct plan or any recommendation from a Gateway determination. • Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole.		
2. Estimated Development Cost and Employment • Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report. • Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided	EDC Report.	An EDC Report will address this requirement.
3. Design Quality ▪ Demonstrate how the development will achieve: ○ design excellence in accordance with any applicable EPI provisions. ○ good design in accordance with the seven objectives for good design in <i>Better Placed</i>. ▪ Where required by an EPI or concept approval, demonstrate how the development has been subject to a competitive design process or reviewed by the State Design Review Panel (SDRP). Recommendations are to be addressed prior to lodgement.	Address in EIS.	Design quality will be addressed in the EIS. It is noted that a Design Review Summary, Design Excellence Strategy and Competition Report are not required for a Proposal of this nature.
4. Built Form and Urban Design ▪ Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. ▪ Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses	Architectural drawings. Design Report. Survey Plan. BCA Compliance Report.	The Proposal will address the requirements of this item through the listed reports.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

and responds to the context, site characteristics, streetscape and existing and future character of the locality. ▪ Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services. ▪ Assess how the development complies with the relevant accessibility requirements.	Accessibility Report.	
5. Visual Impact ▪ Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. ▪ Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	Visual Analysis. Visual Impact Assessment.	The Proposal will be informed by photomontages and perspective drawings, where necessary, and include a Visual Impact Assessment.
6. Traffic, Transport and Accessibility ▪ Provide a transport and accessibility impact assessment, which includes: ○ details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access and haul routes. ○ an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections (using industry standard modelling). ○ plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network. ○ details and plans of any proposed internal road network, loading dock provision and servicing, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards.	Transport and Accessibility Impact Assessment. Construction Traffic Management Plan. Green Travel Plan or equivalent.	The Proposal will address the requirements of this item through the listed reports.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

○ swept path analysis for the largest vehicle requiring access to the development. ○ details of road upgrades, infrastructure works, or new roads or access points required for the development if necessary. ▪ Provide a Construction Traffic Management Plan detailing predicted construction vehicle movements, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.		
7. Trees and Landscaping ▪ Provide a detailed site-wide landscape plan, that: ○ identifies the number and location of trees to be removed and retained, and how opportunities to retain significant trees have been explored and/or informs the plan. ○ details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area). ○ demonstrates how the proposed development would: – contribute to long term landscape setting in respect of the site and streetscape. – mitigate the urban heat island effect and ensure appropriate comfort levels on-site. – contribute to the objective of increased urban tree canopy cover. – maximise opportunities for green infrastructure, consistent with Greener Places and having regard to any bush fire risk.	Landscape Plan. Landscape Design Report.	The Proposal will include a Landscape Plan and Landscape Design Report.
8. Ecologically Sustainable Development (ESD) ▪ Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. ▪ Demonstrate how the development will meet or exceed the relevant industry	ESD Report. NABERS Embodied Emissions Materials Form.	The Proposal will be supported by an ESD Report and NABERS Embodied Emissions Materials Form.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

recognised building sustainability and environmental performance standards. ▪ Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources. ▪ If Chapter 3 of SEPP (Sustainable Buildings) 2022 applies: ○ demonstrate how the development has been designed to enable the general sustainability provisions, as defined in Chapter 3.2(1). ○ provide a NABERS Embodied Emissions Material Form to disclose the amount of embodied emissions attributable to the development in accordance with section 35BA of the EP&A Regulation		
9. Biodiversity ▪ Assess any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land. ▪ If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	Biodiversity Development Assessment Report or BDAR Waiver.	The Proposal will be supported by a BDAR Waiver at a minimum, subject to further investigation.
10. Back-up Power System ▪ Provide a detailed overview of any proposed back-up power system, including the scale and capacity of the system, and any associated testing procedures (frequency and duration). ▪ Provide a detailed justification for the proposed back-up power system, including alternatives considered.	Address in EIS.	The EIS will address the requirement of this item.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

11. Air Quality Provide an assessment of air quality impacts, prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must address construction works and include modelling of emissions and air pollutants from predicted operations (including testing of the back-up power system) and a peak emission and air pollutant scenario, and outline the proposed mitigation, management and monitoring measures that would be implemented.	Air Quality Impact Assessment.	An Air Quality Impact Assessment will be undertaken.
12. Noise and Vibration Provide a noise and vibration assessment prepared in accordance with the relevant EPA guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Noise and Vibration Impact Assessment.	The Proposal will be supported by a Noise and Vibration Impact Assessment (refer to Section 7.2).
13. Ground and Water Conditions - Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site, including soil erosion, salinity and acid sulfate soils. - Provide a Surface and Groundwater Impact Assessment that assesses potential impacts on: - surface water resources (quality and quantity) including related infrastructure, hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses. - groundwater resources in accordance with the Groundwater Guidelines.	Geotechnical Assessment. Surface and Groundwater Impact Assessment. Salinity Management Plan and/or Acid Sulfate Soils Management Plan.	The EIS will address the requirements of this item through the listed reports.
14. Water Management - Provide an Integrated Water Management Plan for the development that: - is prepared in consultation with the local council and any other relevant drainage or water authority. - outlines the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase	Integrated Water Management Plan.	The Proposal will be supported by an Integrated Water Management Plan.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

in servicing demand) and evaluates opportunities to reduce water demand (such as recycled water provision). - o details the proposed drainage design (stormwater and wastewater) for the site including any on-site detention facilities, water quality management measures and nominated discharge points, on-site sewage management, and measures to treat, reuse or dispose of water. - o demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse downstream impacts. ▪ Where drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.		
15. Flooding Risk ▪ Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the <i>NSW Floodplain Development Manual</i>. ▪ Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required.	Flood Risk Assessment.	The Proposal will be supported by a Flood Risk Assessment if required.
16. Hazards and Risk ▪ Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021. ▪ Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis and Multi-Level Risk Assessment. ▪ If the development is adjacent to or on land in a pipeline corridor, report on consultation	Preliminary Hazard Analysis. If required: Hazard Analysis (Pipeline)	The Proposal will be supported by a preliminary risk screening assessment, and if required a Preliminary Hazard Analysis.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

outcomes with the operator of the pipeline, and prepare a hazard analysis.		
17. Contamination and Remediation In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	Preliminary Site Investigation. If required: Detailed Site Investigation. Remedial Action Plan.	The Proposal will be supported by a Preliminary Site Investigation (as a minimum).
18. Waste Management - Identify, quantify and classify the likely waste streams to be generated during construction and operation. - Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. - Identify appropriate servicing arrangements for the site. - If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	Waste Management Plan. Hazardous Material Survey.	The Proposal will be supported by a Waste Management Plan and Hazardous Material Survey.
19. Aboriginal Cultural Heritage Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land.	Aboriginal Cultural Heritage Assessment Report.	The Proposal will be supported by an Aboriginal Cultural Heritage Assessment Report.
20. Environmental Heritage Where there is potential for direct or indirect impacts on the heritage significance of items of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	Statement of Heritage Impact. Archaeological Assessment.	The Proposal will be supported by a Statement of Heritage Impact.
21. Social Impact Provide a Social Impact Assessment prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>.	Social Impact Assessment.	The Proposal will be supported by a Social Impact Assessment.



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

22. Infrastructure Requirements and Utilities ▪ In consultation with relevant service providers: ○ assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. ○ identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. ○ provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	Infrastructure Delivery, Management and Staging Plan.	The Proposal will be supported by an Infrastructure Delivery, Management and Staging Plan.
23. Bush Fire Risk ▪ If the development is on bush fire prone land, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.	Bush Fire Assessment.	The Proposal will address the requirement of this item.
24. Construction, Operation and Staging ▪ If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.	Address in EIS.	The Proposal will address the requirement of this item.
25. Contributions and Public Benefit ▪ Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any Proposal for further material public benefit. ▪ Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	Address in EIS.	The Proposal will address the requirement of this item.
26. Engagement ▪ Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised and feedback provided have been	Engagement report.	The Proposal will be supported by an Engagement Report, in accordance with the <i>Undertaking Engagement Guidelines for State Significant Projects</i> .



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

considered and responded to in the project. In particular, applicants must consult with: ○ the relevant Department assessment team. ○ any relevant local councils. ○ any relevant agencies. ○ the community. ○ if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.		
---	--	--



REQUEST FOR SEARS

Proposed Data Centre

3-4 Apollo Place and 87-91 Mars Road, Lane Cove West

9.0 CONCLUSION

The Proposal as presented through this request is considered to meet the eligibility criteria for DPHI's provision of SEARs. As such, it is requested that NSW DPHI issue formal SEARs for the preparation of an EIS for this Proposal as SSD.

Should you require any further information to do so, please do not hesitate to contact the undersigned on 0458458608 or via email at tklok@willowtp.com.au.

Your sincerely,



Theo Klok
Senior Planner
Willowtree Planning Pty Ltd

Appendix 1 Preliminary Architectural Plans

Appendix 2 Preliminary Massing Montages

Appendix 3 Preliminary Finishes Schedule

