



18 March 2025

Chris Ritchie
Director, Industry and Assessment
Department of Environment and Assessment
Locked Bag 5022
Paramatta NSW 2124

Dear Chris,

Request for Secretary’s Environmental Assessment Requirements (SEARS) - Project Mars Data Centre

We write on behalf of *Goodman Property Services (Aust) Pty Ltd* (Goodman) to request the Department of Planning and Environment (DPE) to issue Secretary’s Environmental Assessment Requirements (SEARS) for a data centre at 12 Mars Rd, Lane Cove West (the site).

Goodman is a digital infrastructure company that owns, develops and manages high quality, sustainable properties close to consumers and provide essential infrastructure for the digital economy. Our properties include warehouses, large scale logistics facilities, data centres and business and office parks globally. Further information on Goodman’s business details are provided below:

Goodman Property Services (Aust.) Pty Ltd	
ABN	40 088 981 793
Address	The Hayesbery 1-11 Hayes Road Rosebery NSW 2018 Australia

Subject site

The site is located at 12 Mars Rd, Lane Cove West NSW 2066 (Lot 22 DP732062) within the Lane Cove local government area (LGA), Lane Cove West Industrial Area, and zoned E4 – General Industrial under the Lane Cove LEP 2008.

The site is currently owned by ‘The Trust Company Limited’ (ACN 004 027 749) as custodian of GAI1 RPF Subtrust, and includes 4 x dated warehouse buildings including hardstand, car parking and landscaping.

The site has a primary frontage to Mars Road of approximately 205 metres and a maximum overall depth of approximately 160 metres, comprising a total area of approximately 33,559sqm. The topography of the site slopes significantly from northwest to southeast of the site.



Figure 1 - Site context (Base source: Nearmap)

The site is bounded as follows:

- **North:** Mars Road. Further to the north is industrial development.
- **South:** Significant landscape buffer. Beyond is the Lane Cove Council Depot, for storage of Council vehicles, and the Blackman Park Grounds. Land to the south zoned RE 1 – Public Recreation.
- **East:** Significant landscape setback of approximately 50m, followed by low density residential development. Land to the east zoned R2 – Low Density Residential.
- **West:** To the west of the site is existing industrial development.

The Proposal

The proposed development comprises the demolition of 4 x existing industrial warehouse buildings on the site and bulk excavation to facilitate the construction, fit out and 24/7 operation of a Data Centre.

The proposal will seek to develop a Data Centre that comprises a load capacity of 90 MVA over 2x Data Centre Buildings, including 2 x levels of Data Hall with rooftop plant and ancillary office. The proposal includes associated carparking and landscaping.

Key components of the proposal includes:

- demolition of existing structures and bulk excavation of the site
- detailed earthworks and infrastructure construction, including vegetation clearing, installation of services and drainage infrastructure
- construction, fit out and 24/7 operation of a data centre with total GFA of 18,829sqm, including 2,562sqm of office
- a floor space ratio (FSR) of approximately of 0.56:1 (Lane Cove LEP provides a 1:1 maximum FSR)
- Approximate 15 – 25m building height
- provision of approx. 23 car parking spaces to meet operational requirements
- Vehicle access for 20m articulated vehicles, with access provided by 3 x crossovers on Mars Road
- Landscaping of 4,779sqm (14% site area)

The site is zoned E4 General Industrial, which permits 'data storage' use, and includes as its first objective '*To provide a range of industrial, warehouse, logistics and related land uses*'.

State Significant Development

The proposal is for a data centre with ancillary office space, which is considered State Significant Development (SSD) under Schedule 1 clause 25 of *State Environmental Planning Policy (Planning Systems) 2021*:

25 Data centres

(1) Development for the purpose of data centres that has a total power consumption of more than the relevant amount.

*(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.

As the proposal is anticipated to have a total estimated power consumption of **Ninety (90) MVA** the requirements of Section 25 are met and the proposal is SSD.

An SSDA application is proposed to be lodged under section 4.38 of the Environmental Planning and Assessment Act 1979 (EP&A Act), for assessment as SSD.

DPHI are requested to issue SEARs under section 4.12 of the EP&A Act and Clause 3 of Schedule 2 of the Environmental Planning and Assessment Regulation 2021 that will enable the preparation of an Environmental Impact Statement (EIS) for the proposed development.

Key Items of Consideration

The EIS will be prepared in accordance with the SEARs and the legislative requirements defined under the EP&A Regulation. The EIS will outline recommendations to address any environmental impacts of the project to inform DPE in its assessment and recommendation on the project.

Key assessment issues for consideration are likely to be bulk and scale due to the necessary height and floor space ratio of the facility. Noise and air quality impacts will also be key considerations.

The proposal will include a height between 15m and 25m. The departure from the 18m height limit over certain portions of the site are necessary to accommodate the development on the significantly slopping topography of the site. A Clause 4.6 variation will therefore be included in the SSD application to justify the departure and demonstrate that any environmental impacts resulting from the departure is acceptable.

Visual Impact and Overshadowing

Visual impact, particularly on the residential receivers to the east and playing fields to the south of the site is a key consideration, however, is alleviated through generous landscape setbacks characterised by tall mature trees.

The proposal seeks to limit the bulk and scale and ensure the development presents a high-quality outcome. The architecture form will provide articulation and visual interest to the facades through strategic location of office spaces and use of high-quality materials.

Generous landscape setbacks will be included to reduce visual impact of the proposed. Preliminary shadow analysis demonstrates acceptable overshadowing on surrounding uses. Detailed shadow analysis will be included with the SSD package once the final scheme is settled.

Air Quality & Noise

The generators, essential for providing essential power redundancy to the data centres critical services and infrastructure in the unlikely emergency power failure event, will be located along the site's western boundary, away from the residential receivers to the east. This will limit noise and air quality impacts resulting from the generators if activated.

Air quality and noise impacts assessment will be undertaken to inform the necessary mitigation measures considered in the submitted plan, including height of the roof top plant screening and total building height.

Dangerous Goods Storage

The necessary diesel tanks to provide sufficient diesel storage to power the emergency generators will be located along the site's western boundary, away from residential receivers to the east.

A detailed dangerous goods assessment will be undertaken during the EIA assessment.

Conclusion

We trust that the above information is sufficient to enable the issue of SEARs for the proposed development. If you wish to discuss any aspect of this letter, please contact Guy Smith on 9230 7225.

Yours sincerely

A handwritten signature in black ink, appearing to read "Guy Smith", with a stylized flourish at the end.

Guy Smith
Head of Planning, Goodman