

13 August 2026

Mr. Lachlan Forsythe
Development Facilitation
Department of Transport and Planning
1 Spring Street
MELBOURNE VIC 3000

Submitted via portal**ADVERTISED
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Dear Lachlan,

**APPLICATION FOR PLANNING PERMIT
DEVELOPMENT FACILITATION PROGRAM DFP-1184
165 WILLIAMSONS ROAD, SOUTH MORANG**

We act for *Dover 1 SM2 Pty Ltd*, the applicant for the land at 165 Williamsons, South Morang and seek planning permission to use and develop the land for the purposes of a data centre, removal of vegetation and construction and display of signs.

This application follows a rigorous assessment phase including engagement with various authorities through the Development Facilitation Program culminating in the issuing of the letter dated 17 July 2026 confirming eligibility ('Eligibility Letter') of this application under the provisions of Clause 53.22 of the Whittlesea Planning Scheme (Planning Scheme). The applicant has been invited to prepare the formal application under the provision on the basis that:

- The proposed land use ('Data Centre') is listed under Table 2 of Clause 53.22-1, and
- The proposed estimated cost of development investment is at least \$20 million,
- Information demonstrating the likely feasibility of the proposal has been provided to the satisfaction of the Minister for Planning, including written advice from the Chief Executive Officer (or delegate) of Invest Victoria.

Notably, this confirms that the application is such that can be considered under Clause 53.22, thus meeting the application requirement of Clause 53.22-1 of the Planning Scheme.

The project is to be subject to a facilitated pathway as it will produce significant economic benefits to the local and broader community including investment and employment opportunities.

The Eligibility Letter requires particular information to be addressed and provided for the consideration of the Minister through this application phase. To assist in your consideration, please find herewith the following documentation in support of the application and associated summary responses:

Requested material	
a) MPL certificate	The MPL Certificate dated 30 July 2026 has been obtained and accompanies this permit application.
b) Quantity Surveyor Report	A Cost Plan has been prepared by <i>WTP Australia</i> which provides an analysis of the building costs and associated expenditure with the proposed data centre of over \$20M exceeding the minimum threshold for consideration under Clause 53.22-1.
c) Financial Feasibility Confirmation	A copy of the <i>Invest Victoria</i> Financial Feasibility Confirmation letter dated 18 March 2026 forms part of this material and which is an application requirement under Clause 53.22-1.
d) Submission Covering letter	This correspondence constitutes the requisite covering letter and confirms the material accompanying the application, together with responses to the

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	<p>preliminary matters and information request under within the Eligibility Letter.</p> <p>The letter also provides confirmation that this is an application to which Clause 53.22 applies, as required under Clause 53.22-1.</p>
e) Responses to referral letters	<p>The correspondence from referral authorities and agencies has sought to be addressed through the revised material including the Biodiversity Report and NVR, Traffic Report, Planning Report, Landscape Plan, Architectural Plans, Urban Design analysis, Acoustic Report, Dangerous Goods Assessment and Fire Study.</p> <p><i>Abzeco Pty Ltd</i> has prepared a covering response in respect to the updated Biodiversity Report to address the <i>DEECA</i> referral letter dated 7 July 2026, and which confirms the matters set out within assessment and NVR.</p> <p>ADP has prepared a covering response to the <i>EPA</i> referral letter dated 28 April 2026 and appended to this correspondence.</p> <p>Similarly, the matters set out within <i>Whittlesea City Council's</i> correspondence dated 25 May 2026 have been variously addressed through the updated material and within this covering letter.</p>
f) Preliminary Hazard Analysis (PHA) & Preliminary Emergency Response Plan	<p>A Fire Study was prepared by <i>Orbe Fire Safety Engineering Consultants</i> and which includes a Preliminary Hazard Analysis as requested by initial response from <i>Work Safe</i>. Following further engagement with <i>FRV</i> and <i>Work Safe</i>, it was advised that a Preliminary Emergency Response Plan will be required.</p> <p>This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright</p> <p>The preparation of a Preliminary Emergency Response Plan is a substantial undertaking which relies on detailed operational, servicing and emergency management inputs that are ordinarily developed at the detailed design and pre-commissioning stages, rather than at the planning application stage. Notwithstanding, the applicant is progressing this work and the Preliminary Emergency Response Plan will be provided when available. However, as the primary purpose of this document relates to the operation of the facility is only required prior to operations commencing, we consider this matter can be appropriately addressed by way of a condition on any permit issued</p>
g) Certificate of title	<p>A copy the Certificate of title for the land comprising Lot 1 on Plan of Subdivision 822500V is provided.</p> <p>There are no restrictive covenants or s173 agreements registered on title, however, a series of easements relating to Transmission of Electricity and Water Supply exist on title associated with existing infrastructure.</p>
h) Landscape Plan	<p>An amended Landscape Plan has been prepared by <i>Greenjoy</i> which aligns with the revised Architectural Plans, Traffic Report for the proposed road alignment and infrastructure, and the Biodiversity Report. The plan includes the extent of proposed canopy tree planting on the abutting road reserves, which would be subject to Council approval, along with regeneration and weed control on the site. Early discussions through DFP officers indicates that there is a level of support for street tree planting to occur and can be addressed by way of permit condition for the landscape</p>

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	<p>works as shown on the plan to be carried out prior to the occupation of the building.</p> <p>The plan specifies:</p> <ul style="list-style-type: none"> • Planting of Blackwood trees around the northern and eastern edges. • An indicative bicycle / pedestrian connection through the site to the Yan Yean Pipe Track for site staff. • Removal of the annotation for fuel tanks within southern section. • Confirmation of canopy tree limitations within the Electrical Transmission easements and confirmed through the Lat Studios Urban Design assessment. <p>The accompanying Urban Design analysis includes recommendations for the landscape plan, which can be addressed in planning permit conditions including:</p> <ul style="list-style-type: none"> • Additional planting and permeable spaces and passive WSUD treatments around the on-site car parking areas. • Designation for the third car park area as 'overflow' and treated in more permeable surfacing. • Trees within the building 'cut outs' around the north, north-east and eastern sections.
i) Urban Design Assessment	<p>The accompanying Urban Design assessment prepared by <i>Lat Studios</i> has been updated in alignment and in consideration of the <i>Greenjoy Landscape Plan</i> which addresses:</p> <ul style="list-style-type: none"> • Tree species, planting schedule and anticipated landscape outcomes associated with the proposal. • Further analysis of the photomontages and architectural cross-sections of interfaces, which form part of the architectural package and in consideration of existing or potential residential areas. <p>In further discussions with DFP officers, it was confirmed that cross-sectional / view analysis is not required from the south noting the railway interface and dwellings being treated to turn away from this.</p>
j) Architectural Plans	<p>The Architectural Plans prepared by <i>Ewert Leaf</i> have been updated in alignment with the various supporting material and specialist inputs. Key updates as requested include:</p> <ul style="list-style-type: none"> • The revised site access and road works as designed by <i>OneMileGrid</i> (dated 6 March 2026). • Connections through the Site (landscape plan). • Photomontages and views. • Clarified fuel tank and storage provisions. • Service provisions identified on the roof and annotated accordingly. • Annotations for acoustic screening for roof mounted servicing. • Sign zone allocation for future business identification signage applied to the eastern and northern façade. • A legend applied on each page. • Floor plan annotations & details of their associated function. <p>The changes have been 'clouded' on the plans for clarity.</p>
k) Town Planning Report	<p>The Town Planning Report prepared by <i>Planning & Property Partners Pty Ltd</i> has been updated to provide:</p>

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	<ul style="list-style-type: none"> • Additional information and considerations for the DPO7, the South Morang Local Structure Plan and the employment generation as set out within the Whittlesea Planning Scheme. • Planning permissions for future business identification signs and associated considerations. • Further assessment and relevant actions Plan for Victoria. • Additional analysis and consideration for the VPO1 and Clause 12.01-1L, noting most of these matters are addressed within the accompanying Arboricultural Report prepared by TMC Reports and Biodiversity Report prepared by <i>Abzeco</i>. • Clarified referral requirements under Clause 66.02-1, 62.02-2, 66.02-4 and 66.02-7. • Updated referencing of the Native Vegetation Report and offset requirements, which are set out within the <i>Abzeco</i> Biodiversity Report.
I) Any other material required by the planning scheme (and matters as addressed through the Eligibility Letter)	<p>Biodiversity Report and associated NVR prepared by <i>Abzeco</i>. The reporting has been updated to respond to the matters set out within the <i>DEECA</i> referral response including</p> <ul style="list-style-type: none"> • Further details on the required vegetation removal and consideration under planning scheme provisions, including the three tiered “Avoid, minimise, offset” requirements. • Alignment with the landscape plan and exclusion zones.
	<p>Acoustic Report prepared by <i>ADP Consulting Pty Ltd</i>. The report has been revised to the matters set out within the EPA referral response including:</p> <ul style="list-style-type: none"> • Details and analysis on the proposed site with associated noise impact assessment. • Updates to align with the revised architectural plans. • Further consideration of the site context and surrounding receivers.
	<p>Traffic Impact Assessment prepared by <i>OneMileGrid Pty Ltd</i>. The report has been updated to address the revised material and matters contained within Whittlesea City Council’s referral response including:</p> <ul style="list-style-type: none"> • The updated road design and access arrangements for Findon Road, which has informed updates to the plans. • The revised intersection details for Findon Road and Williamsons Road. • A traffic survey with associated analysis. • Further considerations in relation to the proposed on-site parking provisions, which also ties in with the revised Landscape Plan and Urban Design material.
	<p>Sustainability Management Plan prepared by <i>GIW Environmental Solutions Pty Ltd</i>. The amended report seeks to respond to the revised Architectural Plans, Landscape Plan and the Council referral comments.</p>
	<p>Dangerous Goods Storage and Planning Report prepared by <i>Focus Environmental Pty Ltd</i>. The report has been updated following engagement with WorkSafe, to reference the revised material and future response considerations.</p>

	Stormwater Management Plan prepared by <i>Matter Consulting</i> . The report sets out the proposed WSUD measures, stormwater treatment measures and General Environmental Duty.
	Waste Management Plan prepared by <i>Leigh Design Pty Ltd</i>
	Economic Impacts Assessment Economic Analysis prepared by <i>Macroplan Holdings Pty Ltd</i>
	The existing approved Cultural Heritage Management Plan prepared by <i>Biosis Pty Ltd</i> and which has been confirmed as remaining relevant for the purposes of this application.

Response to Referral Authorities

The various referral responses received through the initial engagement phase have informed updates to the accompanying application material. A summary response to these matters is contained with **Appendix A** to this submission for your reference.

ADP has prepared a dedicated response to the acoustic matters raised under the EPA referral and provided within **Appendix B**.

In response the matters raised by DEECA, *Abzeco Pty Ltd* has prepared a covering response, which is located within **Appendix C**.

Visual Assessment

Additional view line and render imagery has been undertaken by *Ewert Leaf* to further inform the consideration of the built form within the surrounding context. *Lat Studios* has undertaken further analysis of this within the accompanying Urban Design assessment, and noting the distance from residential interfaces, surrounding road and utility infrastructure, and the proposed landscape and tree provisions, confirms the proposal is an appropriate built form response with commercial appearance.

When reviewing this material, it is helpful to further understand the particular interfaces surrounding the site to aid in the consideration of the proposed built form. The below aerial image has been overlaid with zoning which applies to the land and with annotations for existing land use and built form and relevant designations.

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Source: VicPlan

We note that 135 Williamsons Road has been specifically identified within the Eligibility Letter as a site which requires further consideration in this regard. The land is located to the east and on the opposite side Findon Road from the Site. It is located within the General Residential Zone and was previously the subject of a planning permit for a residential subdivision (716165/1) in 2017. Through further investigations, Whittlesea City Council officers have confirmed that the planning permit associated with this site has now lapsed and the associated plan of subdivision was not certified.

The Title to the land confirms that the land is now within the ownership of Whittlesea City Council and thus, unlikely to be developed for such purposes within it's ownership. Of particular note, the title includes revegetation requirements and a tree reserve has recently been certified (awaiting processing with Titles Office). Under these circumstances, it is possible that this land may form part of the municipal open space network in the future.

The land at 130 Williamsons Road interfacing to the north (beyond the unmade road reserve) is currently under construction for a 4 storey / 15 metre high (approx) self-storage facility in two separate built forms. From the accompanying view line and render material, the presence of this structure in the foreground assists in fettering views to the Site from the residential area to the north, albeit less so towards the north-east. However, the rendered image as taken from the intersection of Findon Road and Williamsons Road demonstrates that the structure is appropriate within the context, and will be further complemented by the associated vegetation as it establishes.

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Source: <https://maben.com.au/storage-king-south-morang/>

The main built form is positioned on the northern section of the Site, with lower height servicing within the southern section. The land interfaces with the railway corridor to the south and the residential pocket of the ACZ2 land has been designed to limit impacts from the railway corridor through positioning of windows. The Google Maps aerial imagery below confirms this approach, and likely acoustically treated under VicTrack development guidelines adjacent to the rail corridor and noise influence areas.



Source: *Google Maps*

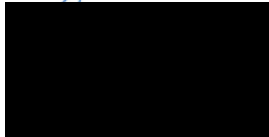
The land directly south and south-east is located within Precinct 5 of the ACZ2 and has in part been constructed for commercial purposes with employment designation, noting that accommodation is prohibited within this precinct.

Outside of these interfaces, there are various utilities including the South Morang Terminal Station to the west, Melbourne Water facility to the east and the Yan Yean Pipe Track, which is also used for linear open space.

As set out within the material, the proposed built form has appropriately responded to the particular interfaces and note that the distance to any residential use is a key consideration of this. The building includes a clean and contemporary architectural form with massing appropriately treated through its articulation and materiality. The proposed landscape treatments as they establish, in addition to proposed public realm planting will further assist to soften views and improve visual response within the setting.

We look forward to engaging with you further in relation to this matter and please contact our office on 8626 9000 (email: little@pppartners.com.au) should you have any queries regarding the correspondence.

Yours faithfully,



Planning & Property Partners Pty Ltd

Encl.

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APPENDIX A – PRELIMINARY REFERRAL RESPONSE SUMMARY

Category	Matter Raised	Proposed Response / Approach
Whittlesea City Council – General Referral Comments (03 Oct 2025)		
Vegetation & Biodiversity	Removal of trees (incl. mature River Red Gums) inconsistent with Clause 12.01-1L and Greening Whittlesea Strategy; outdated (2021) Flora & Fauna Assessment; needs updated survey, Matted Flax-lily impact assessment, revised avoid-and-minimise statement, Kangaroo Management Plan and CEMP.	<p>These matters raised were addressed in revised Biodiversity Report and submission to DEECA on 03 June 2026. The material has since been revised to address the DEECA referral response requirements, and with further response to vegetation policy and controls within the accompanying Town Planning Report.</p> <p>Abzeco will be commissioned to prepare a Kangaroo Management Plan, which can be required via condition of permit.</p> <p>A Construction and Environmental Management Plan can suitably address and limit impacts of construction on the environment, which can be addressed by way of condition.</p>
Environmentally Sustainable Development	<p>BESS not appropriate for this use class, NABERS Data Centre certification (5 star, PUE ≤1.34) and WUE assessment required; clarification sought on cooling system, backup generation, Scope 1 emissions, embodied carbon, energy commitments, renewable energy targets, and net zero pathway by 2036.</p>	<p>GW Environmental Solutions Pty Ltd has revised the SMP to address the matters set out within Council's response and which will allow further assessment of the proposal during this phase.</p>
Stormwater & Drainage	Reliance on proprietary (Atlan) systems not supported unless IWM shown infeasible; MUSIC file required; response should prioritise retention/reduction/delay principles and demonstrate EPA GED / Publication 1739.1 compliance.	<p>A raingarden was proposed in the central section of the site, however, has been replaced by a GEWVVP regeneration area. The car parks can be passively drained to garden beds as shown. A revised Stormwater Management Plan will be included and only use proprietary products where necessary noting the intent to irrigate permeable areas as priority.</p>
Traffic, Access & Parking	Access design not aligned with ultimate Findon/Williamsons Road intersection layout; reliance on U-turns considered unsafe; intersection treatments, pedestrian connections and an updated Car Parking Demand Assessment (Cl. 52.06-7) required.	<p>Both the Architectural plans and the Traffic Report include the updated intersection details as they currently stand, and with a revised access lane from Findon Road proposed with culvert alteration.</p> <p>The report includes updated information on the car parking demand assessment</p>

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Category	Matter Raised	Proposed Response / Approach
		<p>and proposed parking provisions, along with connectivity through the Site.</p> <p>Through the suggestions, a pedestrian / cyclist connection will be made to the Yan Yean Pipe Track with secure access to the south for on-site staff as indicated on the landscape plan.</p>
Planning Scheme & Strategic Context	No endorsed DPO7 Development Plan; Clause 53.22 exemptions noted but notice/advertising discretion remains with the Minister; strategic alignment with South Morang Local Structure Plan to be demonstrated.	The Town Planning Report has been updated to further expand on the DPO7, the South Morang Local Structure Plan and C2Z employment generating uses. Accordingly, the Minister has discretion to issue a planning permit without an approved DP per the schedule, as has been the case with other sites affected by this control.
Heritage	<p>Dry stone walls trigger Clause 15.03-1L / Clause 52.33 – Dry Stone Wall Management Plan and fencing impact details required; Cultural Heritage Management Plan likely required.</p> <p>This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright</p>	<p>The site has been surveyed in consultation with Abzecco and which has confirmed there being no evidence of remnant Dry Stone Walls within the property boundaries. Further, there is no evidence as such identified within the approved Cultural Heritage Management Plan.</p> <p>From inspection, the closest remnants appear to exist outside of the Site within the Williamsons Road reserve and to the south within the Yan Yean Pipe Track land, and note that both sites are under the control and management of Whittlesea City Council.</p> <p>Accordingly, Clause 52.33 is not enacted and a Dry Stone Wall Management Plan will not be required.</p>
Amenity & Operational	24/7 operation requires assessment of cumulative acoustic impacts (incl. terminal station and collector road); Lighting Report needed to address wildlife/habitat corridor impacts; security treatments to be balanced against landscape values.	<p>The revised Acoustic Report has been updated to address matters raised within the EPA correspondence and will be referred to under the provisions for further review of proposed acoustic treatments.</p> <p>ADP will be commissioned to prepare a Lighting Management Plan, which will address environmental factors and limit off-site impacts accordingly. This can be addressed via condition of permit.</p>

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Category	Matter Raised	Proposed Response / Approach
External Referrals	Council notes vegetation removal requires DEECA referral (Cl. 52.17 Detailed Assessment Pathway) and likely EPA / utility authority referral given scale and fossil fuel storage.	Section 55 referrals are noted and will be addressed through this statutory application phase.
Whittlesea City Council – Traffic Referral Response		
Access Design	Ultimate (duplicated) road reserve scenario and dual-sided path to be shown; interim design concept satisfactory subject to swept paths; cycle lane widths to be corrected from 1.5m to 1.8m; footpath connection to Yan Yean Pipe Track to be shown.	Per above. The Architectural Plans and Traffic Report include the revised intersection and access arrangements accordingly. A pedestrian / bicycle connection will be available for site staff per the material.
Traffic Impact Assessment	Updated TIA with current (not SCATS pre-works) traffic counts required; AM/PM peak generation figure (115) to clearly include delivery movements, substation/fuel area traffic, and potential shift-overlap movements (up to 230 at PM peak).	Per above. Revised Traffic Report includes further analysis to address the access considerations.
Car Parking	Statutory car parking rate satisfied (177 spaces required); however, Council's prior comment regarding total employee-based demand (260 spaces without pedestrian connection) remains outstanding.	Parking considerations have been addressed through the revised Traffic Report.
EPA Victoria (28 Apr 2026 – advisory, pre-application)		
Noise	Acoustic Report (ADP) has multiple shortcomings: GED not addressed; noise-generating plant sited toward northern/residential interface; background levels not field-measured; cumulative noise, low-frequency/character adjustments, generator operating assumptions, sleep-disturbance criterion and model uncertainty all require further justification/updating.	Noise monitoring has been undertaken by ADP with associated results and analysis provided within the revised Acoustic Report. Please refer to the letter prepared by ADP demonstrating how these matters have responded to the referral comments.
Air Emissions	Diesel generator air emissions (GHG, NOx, CO, particulates) to be mitigated; exhaust stack height to be set per EPA guidance (Publications 1961.2 and stack-control-odour guidance).	The applicant is aware of the General Environmental Duty and obligations under the relevant legislation to ensure appropriate operating conditions.
Fire, Contamination	DGSPR bunding/battery storage measures supported; EPA references	A Fire Study has been prepared by <i>Orbe Fire Safety Engineering</i>

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& Construction Risk	further guidance on firewater run-off, waste battery storage, liquid storage/UPSS design, and construction dust/noise management.	<i>Consultants</i> and which will include a Preliminary Hazard Analysis, in addition to the Dangerous Goods Assessment and Planning Report prepared by <i>Focus Environmental</i> . Suitable construction management arrangements can be addressed through a Construction Management Plan.
EPA Permissions	Development Licence (or exemption) and Operating Licence expected for activities G04 (bulk storage) and K01 (power generation) – separate to the planning permit process; applicant to engage EPA's Permission Pathway team.	The proponent will undertake engagement with the EPA's Permission Pathway Team accordingly.
DTP Urban Design (per LAT Studios review memo, 19 Dec 2025)		
Landscape Buffers & Interfaces	DTP recommends ample landscape buffers/setbacks along Findon Road and the Williamsons Road extension, with deep-soil zones and canopy tree planting to screen the built form from residential interfaces.	The <i>Lat Studios</i> urban design recommendations have informed the updated material including landscape with additional trees and retention of native vegetation, in addition to planting within the road reserve. Further recommendations can be addressed through suitable conditions of planning permit.
Biodiversity & Planting	Opportunities to expand River Red Gum and Grassy Eucalypt Woodland planting (incl. south-eastern boundary and remaining façade cut-outs) to support DTP's landscape-led design principle and reduce perceived building bulk.	Per above. Please refer to the Biodiversity Report and Landscape plan in respect to regeneration, weed control and additional planting.
Car Parking Greening	DTP supports increased planting within the central car park; recommendation to recategorise southern car park as overflow parking with permeable surfacing and WSUD treatments.	Per above.
Active Transport Access	Opportunity to connect the site to the Yan Yean Pipe Track via a secure access gate, landscaped path and end-of-trip facilities/bike parking near the building entry.	Per above.
Façade & Materiality	DTP's design principles seek a visually recessive façade; Lat Studios consider	These matters have been addressed through the revised material including

Category	Matter Raised	Proposed Response / Approach
	the proposed layered/perforated screen approach responds to this, with support for further greenery integration around building notches.	Architectural Plans and Landscape Plan.
WorkSafe		
Hazard Analysis	DGS Planning Report is high-level only – Preliminary Hazard Analysis (and eventual Final Hazard Analysis) to be prepared and incorporated into an updated Fire Safety Study as part of the statutory application.	<p>Note, Worksafe requested a Preliminary Hazard Analysis but has since requested a Preliminary Emergency Response Plan. This work is under way can be addressed as a planning permit condition. A suitably worded condition of permit can be applied similar to the approval PA2402997:</p> <p><i>1. At least one month prior to the commencement of construction (except for preliminary site works that will not be affected by the outcome from any fire-related hazard assessment), the applicant must develop, implement and maintain written plans for dealing with any emergency associated with the storage and handling of dangerous goods onsite. The plans must include:</i></p> <p><i>a) A 'preliminary' EMP for the operational phase of the full site development, capable of being handed over to any future owner/occupiers. As a minimum the emergency plan assessment is required for the high-risk fire-related hazards associated with dangerous goods storage and handling.</i></p> <p><i>b) Consultation with the relevant fire authority's Dangerous Goods Unit. Consultation must be documented and included with the 'preliminary' EMP. The fire protection system design must be amended, if required, to comply with any recommendations made by the fire authority.</i></p> <p><i>c) Preliminary Pre-Incident Plans (PIPs) must be developed for the high-risk fire related incidents in line with FRV's Fire Safety Guideline GL-52: Development of Pre-Incident Plans at Major Hazard Facility and Dangerous Goods Sites.</i></p> <p><i>2. Prior to dangerous goods arriving onsite, the applicant must complete a</i></p>

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		<i>detailed FSS to identify and mitigate all fire-related hazards associated with the premises, including any future development phases where feasible. The FSS must include consequence assessment (including modelling where necessary), including any specific hazards required by the relevant fire authority's dangerous goods unit. It is a requirement under Reg 51 of the Dangerous Goods (Storage and Handling) Regulations 2022 to provide a suitable fire protection system(s). The applicant must also engage with fire authority to agree appropriate response and systems.</i>
Fire Protection Systems	Preliminary fire protection systems list provided in the FSS; further system detail to be confirmed during the statutory reporting phase.	Per above.
DG Quantities & Site Plan	Discrepancy between reported generator/tank numbers (84 generators, 15 vs 16 x 110,000 L tanks) and site plan (10,000 L tanks) and site plan material to be resolved with updated clearly labelled DG site plan (tank locations/capacities) provided with the formal application.	The servicing and storage provisions have been confirmed within the revised planning application. Planning application Act 1987.
UPS Batteries	Battery count has increased from the 154 stated in the DGS Planning Report to 192 – to be reflected in updated documentation.	Per above.
DEECA		
Native Vegetation Referral	Updated reporting to address Clause 52.17 guidelines, revised landscape plan to address the powerline easement and canopy limitations, updated Biodiversity Report to consider avoid and minimise requirements in respect to construction, external vegetation removal, habitat assessment and methodology, Tussock Skink, Matted Flax-lilly, SHFTLP, surveys, NVR updates, Arboricultural report updates, EPBC Act referral.	<i>Abzeco has prepared separate covering submission to illustrate how these matters have been addressed, and which also has informed updates to the Biodiversity Report, NVR, Landscape Plan and Arborist Report.</i> <i>DEECA will be referred the application under s55 of the Act and will provide an assessment of the updated material, with a response and any conditions to form part of a planning permit for the necessary offsets.</i>

Category	Matter Raised	Proposed Response / Approach
AUSNET		
	No objections subject to conditions.	The permit conditions can be met.

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APPENDIX B – ADP COVERING RESPONSE (EPA)

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Consultant Advice Notice

From	Will Gouthro	Advice No	CAN-AC-01
Project No	MEL4807	Project Name	SM2 Datacentre
Date	7/08/2026	Pages	3
Subject	EPA Response	Revision	0

Context

An initial desktop acoustic assessment¹ for the proposed Datacentre at 165 Williamsons Rd, South Morang found that the relevant EPA noise requirements could be met with noise mitigation recommendations in place.

The Victorian Environment Protection Authority (EPA) provided response² to the initial noise assessment as part of the pre-application submission to the Development Facilitation Program (DFP) within the Department of Transport and Planning (DTP) which included the following general items:

- The EPA considers noise to be the primary risk associated with data centres.
- The initial acoustic assessment did not include site conditions or measurement.
- The initial acoustic assessment did not sufficiently address the EPA General Environmental Duty (GED).

An updated acoustic assessment³ has been undertaken to respond to the above general as well as detailed comments in the full EPA response, including:

- Detailed inspection and noise measurement of the site and surrounding areas.
- 3d acoustic modelling and noise mapping.
- Direct reference and response to the EPA GED.

EPA response comments have been summarised and direct response provided in the following table.

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¹ ADP Consulting, 165 Williamsons Road, South Morang Acoustic Report, 23 July 2025.

² EPA, Planning Permit Application PPA-1184 Use and development of land for a data centre and removal of native vegetation, 28 April 2026.

³ ADP Consulting, 165 Williamsons Road, South Morang Acoustic Report Revision 1, 29 July 2026

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EPA Response

Reference	Item	ADP Response
1	Include consideration of the General Environmental Duty (GED).	Update includes reference to GED in Section 5, consideration of GED principles in Section 8 and outcome in Section 9.
2	Justify how equipment location and orientation 'minimises' noise impact.	Addressed in Section 8 as part of minimising harm. Generators (and rooftop plant) cannot be located on the south-west side of the proposed data centre because of the overhead transmission lines & clearance requirements.
3	Provide justification that criteria applies to all receivers in area.	Update includes site inspection and noise measurement in Section 4 and Noise Catchment Areas (NCAs) in Section 5, including consideration of existing substation noise.
4	Consider undeveloped land that may be developed without planning permit.	Figure 1 includes possible residential development provide by planner which are considered as part of NCA's in Section 5.
5	Describe how noise limits may vary for different receivers.	NCAs provided in Section 5 with full NCA detail provided in Appendix E.
6	Consider noise contribution from other sources.	Update includes site inspection and noise measurement in Section 4 and Noise Catchment Areas (NCAs) in Section 5, including consideration of existing substation noise.
7	Assumed background noise level not accepted. Undertake noise background noise measurements.	Update includes site inspection and noise measurement in Section 4 and Noise Catchment Areas (NCAs) in Section 5, including consideration of existing substation noise.
8	Low frequency statement not accepted and detailed low frequency assessment required.	Low frequency assessment provided in Appendix E and mitigation measures included in Section 8 recommendations.
9	Confirm definition of 'Emergency'.	Clear reference to <i>Emergency Management Act 2013</i> provided and Section 8 mitigation requirements identifies generators are only for unplanned power loss.
10	Confirm generator operation assessment scenario	Scenarios defined in Section 6 including number of generators.
11	Include generator maintenance scenario and assessment.	Update report to clarify detail for maintenance scenario. Numbers confirmed with design team.
12	Propose generator maintenance schedule	Report updated to assess maintenance under daytime Noise Protocol noise limits (not maintenance noise limits) to avoid maintenance schedule and 4 hour limitation..
13	Sleep disturbance criteria for emergency operation is not accepted; no alternative is provided.	Report updated to reference GED and applying all reasonable and practical mitigation where relevant.

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14	Uncertainty of modelling is not addressed.	Uncertainty reduced through 3d acoustic modelling, however acoustic assessments typically manage risk through compounding conservative assumptions and not error analysis. Section 6 updated to provide conservative factors.
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Summary

In all cases the EPA comments have been accepted and the assessment has been updated to address. Key changes include:

- Detailed inspection and noise measurement of the site and surrounding areas.
- 3d acoustic modelling and noise mapping.
- Direct reference and response to the EPA GED.

The noise data and specified acoustic requirements for equipment has not significantly changed, however the ongoing requirements, reviews and checks associated with the GED provides the pathway for better outcomes during the later stages of design where possible.

Will Gouthro

Technical Director | Acoustics

ADP Consulting Pty Ltd

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APPENDIX C – ABZECO COVERING RESPONSE

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12 August 2026

Mr Laurence Lim,
Planner, Planning Facilitation
Department of Transport and Planning
Level 17, 1 Spring Street,
MELBOURNE VIC 3000

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Dear Laurence,

**165 WILLIAMSONS ROAD, SOUTH MORANG — BIODIVERSITY ASSESSMENT REPORT VERSION 4.0
RESPONSE TO DEECA PRE-APPLICATION COMMENTS**

Abzeco Ref: 20065 | DTP Ref: PPA-1184 | NVRR ID: 373_20260807_GUS

Abzeco Pty Ltd was engaged by Dover1 SM2 Pty Ltd to prepare a Biodiversity Assessment Report (BAR) for the proposed data centre development at 165 Williamsons Road, South Morang (Lot 1 PS822500).

This letter accompanies **BAR Version 4.0, dated 12 August 2026**, which supersedes Version 2.0 (2 June 2026) in its entirety. Version 4.0 has been prepared to respond directly to the pre-application comments issued by the Department of Energy, Environment and Climate Action (DEECA) — Ref: 00012074 dated 15 January 2026 and Ref: 00014276 dated 7 July 2026 — and to the City of Whittlesea's comments dated 3 October 2025. It also reflects the current development plan (Ewert Leaf, Project No. M24062, Rev. C, dated 28 July 2026), the updated Arboricultural Assessment Report (TMC Reports, Version 3, 2026) and the revised Landscape Concept Plan (Greenjoy 2026, Revision E).

The independent peer review undertaken by Biosis has been considered in full and all comments have been incorporated into Version 4.0.

We confirm that each matter raised by DEECA has been addressed. A summary is set out below, with the balance of this letter expanding on the principal issues.

1. Summary response to DEECA matters

#	Matter raised by DEECA	Where addressed in BAR V3.0
1	Up-to-date BAR showing all impacts relevant to the current design	Whole report; impacts recalculated against Ewert Leaf Rev. C (28/07/2026) and new NVRR generated 07/08/2026 NVRR ID: 373_20260807_GUS
2	Revised avoid and minimise statement — setbacks, access, crossover, service connections	Section 5.8
3	Constraints posed by the powerline easement to long-term viability and maintenance	Section 5.7
4	Impacts from the connection of all services	Section 5.5 and Figure 4

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#	Matter raised by DEECA	Where addressed in BAR V3.0
5	Works within the Findon Road reserve and public land, including FFG Act species	Sections 3.3, 5.3, 5.5, 6.2 and 7; Table 4
6	Adjustments to the Landscape Plan and associated vegetation impacts	Sections 5.5 and 5.7
7	Activities and impacts within the construction buffer, and protections for retained vegetation	Section 5.5, Table 4, Figure 4 and the Conclusion
8	Further consideration of Victorian Grassland Earless Dragon (VGED)	Sections 5.3, 6.2 and Figure 6 – see also stand along targeted surveys report
9	Likelihood of occurrence for threatened species with Habitat Distribution Models over the site	Sections 3.3 and 5.3; Appendices 2 & 5
10	Presence of Tussock Skink (RFI Condition 5)	Sections 5.3 and 6.2
11	Presence of Matted Flax-lily	Sections 3.3 and 6.1; and Figure 3
12	Likelihood of Seasonal Herbaceous Wetlands (SHWFTLP)	Sections 3.4, 3.4.1 and 6.1; Figure 4
13	Potential for listed orchids	Section 3.3 and Appendix 2
14	Landscape planting schedule and revegetation (RFI Condition 2)	Section 5.7
15	Swamp Everlasting habitat modelling (RFI Condition 4)	Section 3.3; Appendix 2
16	Large tree data inconsistencies between the BAR, NVRR and arborist (RFI Condition 15)	Section 5.5; Table 4

2. Avoid and minimise

The avoid and minimise statement at Section 5.7 has been substantially expanded to document the design evolution and the reduction in impact achieved.

The principal avoidance measure is the consolidation of the scheme from two data centre buildings to one. The original SM2 concept (Ewert Leaf Concept Pack M24062, issued 15 April 2025) comprised Data Centre A and Data Centre B, each with its own footprint, car parking and loading dock. Consolidating to a single building removed the second footprint together with its associated hardstand and access infrastructure:

	Original concept (Apr 2025)	Current design
Number of buildings	2	1
Ground floor footprint	~29,344 m ² combined	18,081 m ²
Total GFA (all levels)	170,738 m ² combined	88,624 m ²
Approximate site coverage	~34% of the 8.638 ha site	~21% of the 8.638 ha site

This represents a 38% reduction in overall built form footprint. It is also relevant that the original design intent contemplated the removal of **all** native vegetation from the site; the current single-building design retains native vegetation wherever practicable, limiting removal to the reduced building envelope, access, car parking and essential services.

Further avoidance is constrained by the site's encumbrances. Two high-voltage powerline easements cross the central portion and the south-west corner, and access is not available from the south, which confines the developable area to the northern portion of the landholding outside the easements. Avoiding the remaining areas of woody vegetation would render the site largely undevelopable for a facility with the infrastructure demands required.

Where impacts could not be avoided or further minimised, offsets have been sourced. An executed Memorandum of Understanding is in place for a native vegetation offset site, and an offset strategy is in preparation to satisfy

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State and Commonwealth obligations concurrently, which has included a preliminary 'pre-referral meeting' with DCCEEW in relation to the native vegetation offset site.

3. Construction buffers, services and protection of retained vegetation

Construction buffers have been applied as follows and are shown at Figure 4:

- 10 m, or to the property boundary, around the main building and substation areas
- 2.5 m around all services, car parking areas, access roads and the new crossover to Findon Road

Every tree within the study area has been assessed individually at **Table 4**, which records DBH, size class, status (retention or removal) and whether the tree has been included in the offset calculations. The assessment has been deliberately conservative: trees that could physically be retained but would sit within a highly fragmented residual patch, or would be subject to greater than 10% TPZ encroachment, have been treated as consequential losses and offset regardless. Trees #24, #44, #45, #46, #239, #240 and #241–242 fall into this category.

Impacts arising from service connections have been assessed against the Preliminary Inground Services Sketch (Ewert Leaf, Rev. 2, dated 20 May 2026). As that drawing notes that in-ground pipework and conduit locations are approximate, a 2.5 m buffer has been applied and any overlap with mapped native vegetation included in the offset scenario. Along the north-east interface, trees #19, #20, #22, #23 and #24 exceed the 10% TPZ encroachment threshold and are included as losses; Tree #21 is outside the service alignment and will be retained with TPZ fencing.

Protections for retained vegetation are set out in the Conclusion and include tree protection fencing (1.5 m chain mesh, or 1.8 m star pickets with high-visibility webbing) installed prior to the commencement of construction and maintained for the duration of works. This is a condition of the planning process under the Planning and Environment Act 1987. The DBH of the tree is recorded for the purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The DBH of the tree is recorded for the purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987.

Of particular note, **Tree #43** — a 165 mm DBH hollow bearing River Red Gum within the Findon Road reserve — is to be retained with a minimum 15 m TPZ. We note some potential for encroachment from the proposed fire tanks and recommend this is resolved at detailed design.

4. Powerline easement constraints and long-term viability

In response to DEECA's request for further detail on the easement, and to RFI Condition 2 regarding the Landscape Plan, Section 5.7 clarifies that revegetation is not proposed as a key component of future site management. Abzeco does not recommend planting woody vegetation beneath the power easements. The priority activity is weed control, which will allow regeneration and expansion of the existing matrix of native grasses and herbs, however, the objective is not to reinstate GEWVVP beyond the current mapped extent.

Biomass within the easements is presently managed by kangaroo grazing and irregular slashing by the relevant utility authority, and it is assumed slashing can continue post-development via an arrangement with the easement holder. A Weed Management Plan will provide a works schedule and action plan over a minimum 10-year period, addressing easement management and capable of adaptation over time. The planting schedule in the Greenjoy Rev. E Landscape Plan is understood to be indicative, flexible and secondary to the protection and maintenance of retained Plains Grassy Woodland.

5. Findon Road reserve and public land

Works proposed within the Findon Road reserve and adjoining public land have been reviewed. The northern and north-east construction buffers support populations of Austral Crane's-bill *Geranium solanderi* var. *solanderi* (listed endangered under the FFG Act), including 200+ specimens along the north-east interface. Salvage and translocation is recommended, and an FFG Act permit will be required for the removal of any specimens from

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public land. Tussock Skink must also be assumed present within the road reserve, as the habitat is contiguous with the study area, notwithstanding that the reserve is regularly mown and was not included in targeted surveys.

Several planted non-indigenous trees within the reserve (#303–305 Spotted Gum and #310–314 Smooth-barked Apple) are directly impacted by the proposed new access alignment and may require replacement.

6. Threatened fauna

Victorian Grassland Earless Dragon. Targeted surveys were undertaken using 200 artificial spider burrows and 220 concrete roof tiles deployed across the study area, supplemented by endoscopy of soil cracks and natural spider burrows. All burrows and tiles were checked twice weekly over an eight-week period between March and early May 2026. No VGED were detected. A stand-alone targeted fauna survey report has been prepared (Abzeco 2026).

Tussock Skink (RFI Condition 5). Tussock Skink was recorded on 47 occasions over the eight-week survey from 9 of the 12 tile grids deployed. Although no grids were installed beneath consolidated canopy, observations were distributed across most of the site and the species is assumed to have potential to occur throughout. It is recommended that the initial site scrape be supervised by a qualified wildlife handler with FFG Act authority, with salvaged individuals translocated into retained areas — ideally within 200 m of capture, such as parts of the powerline easements. A stand-alone salvage and translocation protocol can be prepared for DEECA review if required.

Striped Legless Lizard. Habitat Distribution Mapping does not overlap the site, there are no records within 5 km, and the site lacks connectivity. Consistent with previous advice from Council and DEECA, and with the EPBC referral information lodged for the adjacent Findon Road extension, the species is considered unlikely to occur and targeted surveys are not warranted.

7. Threatened flora

Matted Flax-lily. Reference site checks were undertaken at the known population at 135 Williamsons Road on 21 October and 6, 13 and 20 November 2025 to establish whether the species was flowering. No flowering material was observed on any occasion, so the 2025 targeted surveys relied on above-ground leaf material, which is acknowledged as a limitation. Further targeted survey on 26 May 2026 relocated seven of the 12 plants recorded in 2022 plus one new plant. Taken as a composite across the 2018, 2019, 2022 and 2025–26 survey programs, the study area is assumed to support at least 14 Matted Flax-lily plants, of which at least nine fall within the proposed building footprint or construction buffers. A Salvage and Translocation Plan will be prepared for DEECA and DCCEEW approval.

Listed orchids. No orchid species have been recorded by Abzeco across more than 20 years of site reconnaissance. The site has been systematically traversed on at least four occasions using 1–2 m transects during spring targeted surveys, coinciding with the flowering period of Charming Spider-orchid and Wine-lipped Spider-orchid. The eight-week fine-scale ground inspection undertaken in autumn 2026 overlapped the flowering period for Fringed Helmet-orchid. Survey during winter has been limited and may not have coincided with peak flowering for Emerald-lip Greenhood; however, spent flower stalks of *Pterostylis* are readily identifiable and would be expected to have been detected during spring survey. Listed orchids are considered unlikely to occur.

Swamp Everlasting (RFI Condition 4). Habitat Distribution Modelling includes two pixels over the study area, one roughly aligned with the ephemeral wetland area observed in 2020. No VBA records exist within a 5 km radius. Given the inconsistency of habitat, the species' ready identifiability, and the absence of any observation over 20 years, Swamp Everlasting is considered unlikely to occur.

8. Listed ecological communities

GEWVVP. All mapped Plains Grassy Woodland (EVC 55_61) within the study area has strong affinities with the critically endangered *Grassy Eucalypt Woodland of the Victorian Volcanic Plain*. All habitat zones other than HZ5 meet the description thresholds in the listing advice for native perennial grass cover ($\geq 50\%$) and herbaceous

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species diversity (>10 perennial groundstorey species), though they do not support the threshold number of large old trees. As a precautionary measure all zones other than HZ5 have been treated as GEVVVP, giving a total extent of 4.514 hectares. Because the extent varies seasonally, Figure 5 shows overlapping 2024 and 2025 mapping and the greater outline of both has been adopted.

SHWFTLP. Under prolonged flooding the eastern portion of HZ4 could share affinities with *Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains*. The vegetation has not been observed to meet all key diagnostic characteristics or condition thresholds, and no flora with aquatic affinities was recorded in 2025–26. As a precautionary measure the potential extent has been enlarged and a buffer applied over areas of shallower topography. No impact to this area is proposed under the current development plan, and it should be treated as a no-go zone.

9. Large tree data reconciliation (RFI Condition 15)

The discrepancies between earlier report versions, the NVRR and the arboricultural assessment are addressed following Table 4. In summary, arborists take measurements at 1.4 m above ground and also record basal diameter, whereas the Vegetation Quality Assessment methodology requires DBH at 1.3 m, which accounts for much of the variation:

- **Tree 8** is a small tree under both datasets. The bracketed 86 cm figure in the arboricultural report is a combined measurement of both stems of a basally bifurcated tree and is not relevant to the VQA method.
- **Tree 48** was measured by Abzeco at 81 cm DBH, qualifying as a Large tree against the 80 cm Plains Grassy Woodland benchmark. The arborist measurement of 75 cm is not a substantial difference and is attributable to measurement height, minor burls or protruding bark.
- **Tree 52** was measured by Abzeco at 93 cm DBH against the arborist's 61 cm. The tree bifurcates at approximately 1.2 m, so the Abzeco measurement captured the width of both trunks.
- **Tree 54** is in poor condition, has previously been felled and is coping from a root plate with basal decay. It has been included in the offset.

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10. Native vegetation impacts and offset requirement

The reconciled impact and offset figures, consistent with NVRR 373_20260807_GUS dated 7 August 2026, are:

Item	Figure
Assessment pathway	Detailed
Location category	Location 2
Patch of native vegetation to be removed	2.858 ha
Scattered trees to be removed	0.203 ha (2 large, 3 small)
Total extent of removal	3.061 ha
Large trees in patches	4
Total large trees to be removed	6
General offset requirement	1.1880 General Habitat Units
Large tree offset requirement	6
Minimum Strategic Biodiversity Value score	0.5294
Vicinity	Melbourne Water CMA or City of Whittlesea
Species offset triggered	No

The required general offset is available on the Native Vegetation Offset Register via an accredited broker, and a search report has been provided to the proponent. These figures are State-based only and do not address

Commonwealth offset obligations under the EPBC Act. However, as noted above, an executed MOU is in place for a native vegetation offset site that will satisfy both Commonwealth and State based requirements simultaneously.

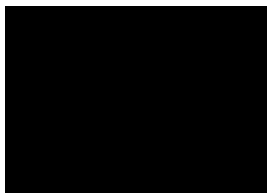
We recommend these figures are adopted verbatim in the town planning report to ensure consistency across the application package.

11. EPBC Act

Two Matters of National Environmental Significance are relevant: up to 14 Matted Flax-lily plants and approximately 4.514 hectares of GEWVVP. Referral to DCCEEW will be required and the proposed action is likely to be determined a controlled action. A consolidated plan will be required as part of the referral, including a Commonwealth offset proposal for the loss of GEWVVP and a Matted Flax-lily Salvage and Translocation Plan. As described above, an initial 'pre-referral meeting' with DCCEEW has been completed in relation to the native vegetation offset site that has been secured via MOU with the landowner. This process will continue to run in parallel to the planning permit process.

We trust the revised BAR and this letter resolve the matters raised by DEECA. Please contact me on [REDACTED] or [REDACTED] should further information be required.

Yours sincerely



Abzeco Pty Ltd

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Attachments

- Biodiversity Assessment Report Version 4.0, 12 August 2026 (incorporating Attachment 1 — development plans; Attachment 2 — Native Vegetation Removal Report ID: 373_20260807_GUS)

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