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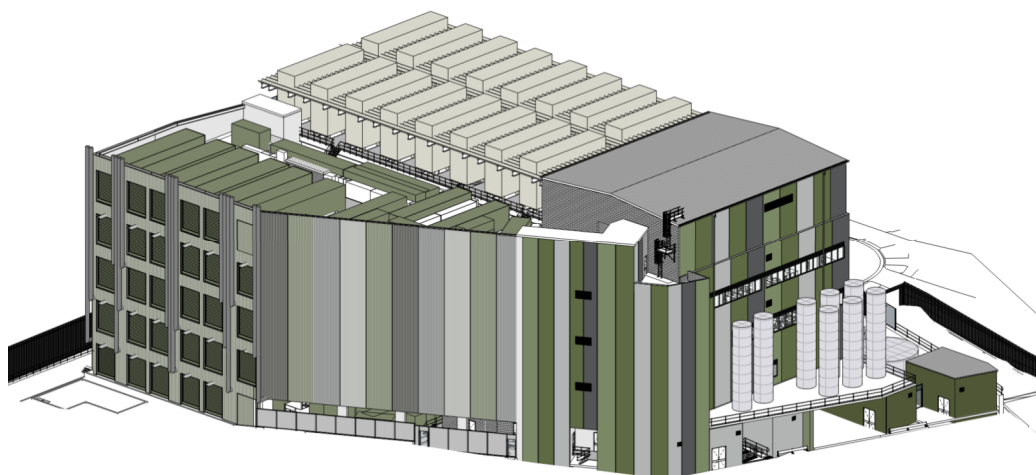
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CLIENT



PROJECT

SYD2 Shell E



TITLE

Community Consultation & Complaints Handling Strategy

ORIGINATOR

A W EDWARDS

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Community Consultation and Complaints Handling Strategy

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	PREPARED BY	REVIEWED BY	APPROVED BY
Name	Elle Mursell		
Company	A W Edwards Pty Ltd	A W Edwards Pty Ltd	A W Edwards Pty Ltd
Project Role	Communications, Stakeholder, Engagement & Social Impact Manager		
Signature			
Date	24.03.2026		

REVISION

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AW EDWARDS acknowledges the Traditional Owners of Country throughout Australia and recognises the continuing connection to lands, waters and communities.
We pay our respect to Aboriginal and Torres Strait Islander people and culture, and to their Elders past and present.

"COMMUNITY"
Artwork by Raechel Saunders

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1 INTRODUCTION

1.1 DOCUMENT PURPOSE

A W Edwards (AWE) has been awarded the contract to deliver a new data centre development known as SYD02 Shell E (formerly known as the Apollo Data Centre) (the Project). This includes site establishment and bulk excavation, construction and fit out works.

This Community Consultation and Complaints Handling Strategy (CCCHS) has been developed to detail how AWE will manage stakeholder consultation and complaints handling during construction of the Project.

1.2 OBJECTIVES

Objectives of this CCCHS are to:

- Meet consent conditions
- Establish clear and timely communication mechanisms with stakeholders
- Implement a structured complaints and feedback mechanism
- Build and maintain community trust and transparency

1.3 COMPLIANCE

SSDA 67407231 condition of consent (CoC) C3 sets out the requirements for the preparation of the Construction Environmental Management Plan (CEMP) which addresses how A W Edwards will manage community and stakeholder liaison through construction of the Project. In particular, CoC C3 states:

As part of the CEMP required under condition C2 of this consent, the Applicant must include the following:

(a) details of the community consultation and complaints handling procedure to be implemented during construction;

(b) Construction Noise and Vibration Management Plan (see condition B7);

(c) Construction Traffic Management Plan (see condition B26);

(d) Erosion and sediment control plan(s) (see condition B39);

(e) Unexpected Contamination Finds Procedure (see condition B59); and

(f) Remedial Action Plan (see condition B60).

This CCCHS has been prepared to address CoC C3(a), and other relevant requirements pertaining to community consultation and complaints handling referenced within the SSD 6740231 Development Consent.

SYD02 Shell E works will not commence until the CEMP and other relevant Management Plans required to be developed as part of the Project's CoC have been approved by the Planning Secretary.

1.4 REVIEW MECHANISMS AND ACCOUNTABILITY

AWE's Project Manager is accountable for this CCCHS, including the authorisation and monitoring of the document, and delegation of responsibilities to implement this SMP.

This SMP will be reviewed and updated as necessary to reflect:

1. Changes in design and construction program.
2. Community interests and issues.
3. Lessons learnt.

The Project Manager has delegated responsibility to the Community Relations Manager to implement the plan, ensure compliance with the Planning Approval and ancillary requirements, and review and update as necessary.

1.5 INTERFACE WITH OTHER PLANS

This strategy interfaces with other AWE management plans and statements including the Construction Environment Management Plan (CEMP), Construction Noise and Vibration Management Plan (CNVMP) and Construction Traffic Management Plan (CTMP).

2 PROJECT DESCRIPTION

2.1 OVERVIEW

The SYD02 Shell E Project involves the construction of a new seven storey (32.68m height) data centre facility with an approximate gross floor area of 9,328sqm, located at 1 Apollo Place, Lane Cove West (SP 80721).

The site is situated within the Lane Cove West Business Park, an established employment and industrial precinct surrounded by a range of commercial, light industrial and technology-based businesses.

The location of SYD02 Shell E has been strategically selected to co-locate with the data centre currently under construction at 1 Sirius Road (Lot 1 DP 1271404). Once complete, this development will extend the consolidated data centre campus to approximately 44,842 sqm, strengthening the precinct's role as a key digital infrastructure hub within Sydney's north-western technology corridor.

This co-location represents a logical and efficient expansion of existing infrastructure, enabling the clustering of complementary digital facilities while maximising the use of existing services, utilities and transport connections. The project will also contribute to local employment generation, providing job opportunities close to where people live and within proximity to key transport routes such as Epping Road, the M2 Motorway, and major bus corridors connecting to Macquarie Park and the Sydney CBD.

A detailed description of the SYD02 Shell E project scope and key construction activities is provided below.

Figure 1 Location of SSDA –67407231 Site



2.2 SYD02 SHELL E WORK SCOPE

Construction activities centre around five key work activities programmed to take place over approximately two years and delivered in two distinct phases as outlined in the table below.

Table 2.2 Key construction phases and activities

Phase	Key activities	Description	Estimated duration
1	Site establishment	- Installation of environment controls - Establishment of construction facilities	12 – 16 weeks
	Bulk earthworks, cut/fill and excavation works	- Cutting, filling, levelling and compacting works to create a stable and suitable platform for the building - Removal of soil, rock, and other materials	
2	Civil and in-ground works (building footprint)	- Rock anchoring - Surface preparation works - Infrastructure and services augmentation works - Piling	60 – 80 weeks
	Building construction works (building footprint / staging areas)	- Construction of the main building structure - Construction of other buildings/structures/services	
	Building fit-out (building footprint / staging areas)	- Internal fit-out within the building - Deliveries	
	Testing and commissioning (building footprint / staging areas)	- Services fit-off - Installation, energisation and testing of assets	

3 PROJECT DELIVERY TEAM

Our project delivery team will ensure effective management of all stakeholder issues and communication and engagement activities through construction of the Project.

3.1 ROLES AND RESPONSIBILITIES

The key community and stakeholder roles and responsibilities for the project team are described in Table 1 below.

Table 3.1 community and stakeholder roles and responsibilities

Role	Responsibility
Project Manager	■ Ensure stakeholder and community engagement obligations are appropriately resourced and supported. ■ Support Community Relations Manager to meet planning approval and client requirements. ■ Attend stakeholder meetings, events, and site visits where necessary.
Site Manager and Construction Manager	■ Ensure communication timeframes and requirements are understood and integrated into the construction program. ■ Minimise construction impacts on the local community where possible. ■ Support communications protocols and notify the team of any community or media contact. ■ Maintain safe and clear access around work zones.
Community Relations Manager	■ Manage and implement stakeholder engagement in line with planning approvals and client obligations. ■ Act as the primary contact for stakeholder issues and complaints. ■ Prepare communication materials and engagement activities. ■ Liaise with AirTrunk, community members, and other stakeholders as required. ■ Maintain up-to-date stakeholder and engagement documentation.

3.2 PROJECT TEAM INDUCTIONS AND TRAINING

All AWE staff (including contractors and subcontractors) will be made aware of stakeholder and community relations requirements through mandatory project inductions, toolbox talks, pre-start meetings and other internal meetings and training events. This will include at a minimum:

- relevant details of the CCCHS including purpose and objectives
- key stakeholder and community issues and mitigation measures
- specific communications and engagement requirements and responsibilities
- community contact protocols and procedures
- crisis communication procedures
- appropriate interaction with homeless people
- use of social media.

Site induction and training material will be updated regularly to address any actions taken in response to stakeholder and community issues or changes to this plan.

4 OUR COMMUNICATION AND ENGAGEMENT APPROACH

Our communication and engagement activities are guided by the NSW Department of Planning's engagement framework, which advocates for a proportionate approach, ensuring that the scale and intensity of engagement is appropriate to the project's potential impacts and the level of community interest.

By adopting a proportionate engagement strategy, we aim to:

- deliver meaningful and targeted consultation
- avoid stakeholder fatigue
- manage time and resources effectively.

The scale of engagement is shaped by several factors, including:

- the size and nature of the project impacts
- the geographic reach of those likely to be affected
- the number and type of engagement activities, including tailored approaches for specific groups
- the project phase and associated stakeholder needs

Our engagement approach will also be guided by the best practice principles of the International Association for Public Participation (IAP2), which provide a framework for selecting appropriate and proportionate levels of stakeholder engagement. In line with this framework, the following levels of engagement may be applied throughout the project:

- Inform – providing timely, accurate and accessible information about the project and its potential impacts.
- Consult – actively listening to stakeholder feedback and demonstrating how input is considered in project decisions.
- Involve – working with stakeholders to ensure their perspectives are reflected in project planning and mitigation measures.
- Collaborate – partnering with stakeholders, where appropriate, to identify solutions and incorporate their insights into project outcomes.

By applying these principles, AWE will aim to ensure engagement is transparent, timely and responsive, providing stakeholders with clear information about the project and meaningful opportunities to ask questions, raise concerns and contribute feedback throughout the delivery of the works.

5 STAKEHOLDER IDENTIFICATION AND COMMUNITY CONSULTATION

For the purposes of this CCCHS stakeholder engagement will be scaled proportionally in accordance with the anticipated impact radius of construction activities.

Properties located within a 130-metre radius of the site are expected to experience the greatest potential impacts during construction as outlined in our Construction Noise and Vibration Management Plan. Accordingly, the owners and occupiers of these properties, along with stakeholders who may have an interest in or be affected by the project, have been identified as key audiences for engagement (consultation).

These stakeholders will form the primary focus of the communication and consultation tools implemented by A W Edwards throughout the delivery of the project, and proportionate engagement level.

Table 5 Communication and engagement (consultation) activities

Stakeholder group	Likely issues/ interests	Engagement level	Consultation activities
NSW government agencies and departments	- Compliance with planning conditions and project requirements. - Impacts to assets. - Impacts to constituents (elected officials). - Impact to community.	Involve	- Briefing and provision of information as requested. - Responses to enquires via AirTrunk.
Local businesses within work impact zone – 130m (primarily corporate offices, industrial and commercial businesses)	- Noise, dust, traffic disruption. - Construction fatigue. - Parking impacts.	Involve	- Preliminary briefing with sensitive receivers, notification issued to potentially impacted properties prior to works commencing detailing contact information, project scope, potential impacts and mitigation measures. - Additional works notifications and update slips ahead of key triggering works. - Email updates and personalised visits as required.
Local Residents and businesses (200m+)	Potential for small increases in noise, increased traffic and changes to visual amenity.	Inform	- Letterbox notification prior to work commencement. - Project website and contact details included within notification and displayed on site hoarding.
Lane Cove Council	Impacts on local traffic, parking, footpaths, and facilities; surrounding residents and businesses; community complaints; flora and fauna; council infrastructure and projects; and nearby private developments.	Collaborate	Preliminary briefing, continued briefings and written updates as required.
Service providers	Impact to assets and customers.	Collaborate	Work closely with service providers to coordinate messaging and minimise impacts.

Road and pathway and other associated asset owners, users and operators (Transurban, TfNSW, cyclists, motorists and pedestrians, Emergency Services and Lane Cove Council)	- Impact to roads, footpaths and other assets. - Changes to traffic conditions. - Delays in travel times.	Involve	- Briefings with key stakeholders ahead of impacting works. - Inform TMC of any traffic delays caused by Projects work so that traffic alert/s can be issued. - Issue regular notifications and updates. - Installation of appropriate signage/wayfinding.
Community Groups including Lane Cove Bushland & Conservation Society and Lane Cove Sustainability Action Group	Environment, visual amenity.	Inform	Preliminary briefing then referral to project website and provision of contact details.
Childcare Centre (located on 200m boarder)	Noise, increased traffic, air quality.	Involve	Preliminary briefing with work notification displaying contact details, email updates and personalised visits as required.
Sensitive receivers	Noise and vibration, dust, traffic and parking impacts and visual amenity.	Involve	Preliminary briefing with work notification and to consult on expected impacts and mitigation measures. Contact details exchanged alongside acknowledgement of preferred contact methods.
Media	Negative media attention due to unhappy project stakeholders, on-site incidents, project delays/ other perceived project issues.	Inform	Support AirTrunk to proactively share accurate information and address false information.

5.1 COMMUNICATION IMPLEMENTATION PLAN

The following implementation plan provides a guide for key communication activities that will occur during each project phase and key activities.

Table 5.1 Communication Implementation Plan

Project phase	Tools/Action	Stakeholders
1. Site establishment & bulk earthworks	- Start of work notification. - Signage installed with contact information. - Consultation with sensitive receivers. - Key stakeholder presentations, meetings and briefings. - Project induction.	- All residents and business within impact zone - Adjacent residents, businesses and sensitive receivers. - Pedestrians, cyclists, motorists and commuters. - Local council and traffic authorities. - Neighbouring construction projects. - Local day-care centre.
2. Data centre build encompassing: Civil and in-ground works	Notification and email updates to inform of planned activities and what to expect.	All residents and business within impact zone

• Building construction works • Building fit-out • Commissioning	• Specific consultation with affected sensitive receivers as required. • Doorknock adjacent residents and businesses. • Key stakeholder presentations, meetings and briefings.	• Adjacent residents, businesses and sensitive receivers. • Local council and interface contractors. • Neighbouring construction projects.
Key activities throughout construction		
Utility works (relocation, installation and protection)	■ Notification and doorknock – noise, detours, access, service disruptions. ■ Notice to and coordination with utility providers. Utility provider to issue notification for any service disruptions to impacted properties. ■ Directional signage to inform pedestrian and vehicle detours. ■ Traffic controllers deployed as required to manage pedestrian/commuter/vehicle interface with vehicles.	■ Residents and businesses within impact zone metres. ■ Service providers. ■ Pedestrians, cyclists, motorists and commuters.
Large excavations and concrete pours	■ Notification and email updates. ■ Doorknock - noise, detours, and driveways. ■ Mitigations as per Construction Noise and Vibration Guidelines. ■ Traffic Management Plan, road and pedestrian detours, signage.	■ Residents and businesses within impact zone ■ Pedestrians, cyclists, motorists and commuters.
Road and footpath closures (both short and long term)	■ Traffic Management Plan, notifications, road and pedestrian detours, signage. ■ Traffic controllers deployed to manage pedestrians, cyclists, and motorists through the changes.	■ Local residents and businesses. ■ Pedestrians, cyclists, motorists and commuters.
Emergency work	■ Notification via doorknock/ email/ telephone call.	■ Affected properties.

5.2 MANAGEMENT OF COMPLAINTS AND ENQUIRIES

Community and stakeholder complaints must be effectively managed and recorded. They provide a mechanism for tracking issues and interests and for evaluating the effectiveness of mitigation measures and communication tools used.

To ensure effective management of complaints and enquires related to SYD02 Shell E works, the procedures outlined in Tables 5.1.1, 5.1.2 and 5.1.3 have been developed.

Before commencement of construction, community contact details will be displayed on site hoarding and detailed in public communication materials. This will include a project phone number, email addresses and website URL.

Phone: (02) 8036 7211

Email: community@awedwards.com.au

Website: apolloplacelanecove.com.au

5.2.1 Enquiries

An enquiry is an act of a community member or stakeholder asking for information relating to the project. The Community Relations Manager will respond to all enquiries received via phone, face to face or email within the timeframes indicated in the table below, and otherwise in accordance with the requirements of Air Trunk and the Planning Approval

TABLE 5.1.1 - ENQUIRY RESPONSE TIMES

ENQUIRY TYPE		RESPONSE TIME
Telephone or face to face	■	Answer all enquiries received in person or via phone during business hours (immediate acknowledgement).
	■	Verbal response/ update within one business day unless enquirer agrees otherwise.
Written - email	■	Immediate acknowledgement via auto generated message.
	■	Initial response/ update via phone within one business day (if number available).
	■	Written response within 7 business days of receipt.

5.2.2 Complaints

A complaint is an interaction with a community member or stakeholder who expresses dissatisfaction with the project, its policies, AWE services, staff members, activities or proposed activities. The Community Relations Manager will respond to all complaints received via phone, face to face, or email within the timeframes indicated in the table below, and otherwise in accordance with the requirements of Air Trunk, the Planning Approval and Australian Standard for Complaints Handling which prescribes that each complaint should be acknowledged immediately and an initial response be provided within two hours.

TABLE 5.1.2 - COMPLAINT RESPONSE TIMES

COMPLAINT TYPE		RESPONSE TIME
Telephone or face to face	■	Answer all complaints received in person or via phone during construction hours (immediate acknowledgement).
	■	Initiation of investigation upon receipt.
	■	Verbal update within two hours unless complainant prescribes otherwise.
	■	Formal close-out in writing within 7 business days.
Written - email	■	Immediate acknowledgement via auto generated message.
	■	Initiate investigation upon receipt of complaint.
	■	Verbal response within two business hours (if telephone contact details are recorded).
	■	Written update within 1 business day of receipt.
	■	Formal close-out in writing within 7 business days.

5.2.3 Complaint Handling Process

The Community Relations Manager will be principally responsible for the management of complaints about construction activities and will be available to receive and respond to all complaints during business hours. Complaints received out of hours will be responded to the next business day.

Should a complainant be unsatisfied with the Community Relations Managers response to their complaint, they will then be escalated to AirTrunk. Complaint handling responsibilities are summarised in the table below.

TABLE 5.1.3- COMPLAINT HANDLING RESPONSIBILITIES

COMPLAINT TYPE	RESPONSIBILITY
Complaints about construction activities	Community Relations Manager.
Complaints unrelated to A W Edwards works	Referral to Lane Cove Council or other relevant organisation if known.

Complaints about construction activities Community Relations Manager.

Complaints that are not resolved by the Escalated to AirTrunk.
A W Edwards team

5.2.4 Recording complaints

A Complaints Register will also be maintained by AWE to record information on all complaints received during construction.

The Complaints Register at a minimum will record:

- number of complaints received
- number of people affected in relation to the complaint
- nature of the complaint and means by which the complaint was addressed

The Complaints Register will be provided to AirTrunk as required for reporting to relevant authorities as required under the projects Planning Approval.

5.2.5 Feedback

Feedback is defined as information or statements of opinion obtained from stakeholders about the project, its policies, AWE services, staff members, activities or proposed activities. Feedback may be received via phone, face to face, in writing or via social media, and may be positive or negative.

Feedback will be recorded and passed onto the construction team and AirTrunk to inform continuous improvement.

A W Edwards will seek clarity with stakeholders as to whether they wish to record negative feedback as a complaint against the project.

5.3 MANAGEMENT OF CRISIS COMMUNICATIONS

5.3.1 Crisis communication procedure

In the unlikely event that a crisis or incident occurs, a crisis communication procedure will be enacted. AWE has prepared a communication management system as part of its Incident, Emergency, and Crisis Management Plan. It sets out the obligations of each party including in relation to Minister's Conditions of Approval for incident notification (C10), and the management and reporting of incidents as per C1 H(i).

To ensure preparedness for an incident or crisis, AWE will:

- notify its staff and associates of their obligations under the Emergency Management Plan via inductions and tender/contract information
- hold formal crisis event communications exercises
- prepare communication templates and draft holding statements for use in an incident or crisis.

The communication management system within the Emergency Management Plan includes protocols for notifying neighbouring stakeholders of incidents that may affect them and keeping them updated.

The Community Relations Manager will liaise with AirTrunk Communications Manager and provide assistance and support with this as required

5.4 MANAGEMENT OF MEDIA AND GOVERNMENT RELATIONS

Air Trunk is responsible for managing media and government relations for the project. If a complaint or enquiry is received from media or government representatives, AWE will ensure that no response is given, and that they are politely referred to AirTrunk.

The Community Relations Manager will provide assistance and support with this as required.

APPENDIX A – COMMUNITY STAKEHOLDER TABLE (130M IMPACT ZONE)

STAKEHOLDER/ BUSINESS NAME	ADDRESS	STAKEHOLDER GROUP
Transurban	3 Sirius Road, Lane Cove West	Commercial
Transurban	3 Sirius Road, Lane Cove West (Lane Cove Tunnel Ventilation Shaft)	Commercial
Air Trunk	1a Sirius Road, Lane Cove West	Commercial
Multiple business occupants including; Mission Systems (lvl 2)	4 Apollo Place, Lane Cove West	Commercial
Multiple business occupants including; Swanky socks, No1 Draft Pick, DKM Blue	5 Apollo Place, Lane Cove West	Commercial
Multiple business occupants including; Class Occasion Hire, Studio Noir	11 Sirius Road, Lane Cove West	Commercial
Multiple business occupants including; Ukulele Mate, Plunge City, Combat Cartel	9 Sirius Road, Lane Cove West	Commercial
Multiple business occupants including; Signature Orthopedics	7 Sirius Road, Lane Cove West	Commercial
Air Trunk	2 Apollo Place, Lane Cove West	Commercial
Multiple business occupants including; Western Power Services, Medlogical Innovations, Steinhoff Asia Pacific Ltd	3 Apollo Place, Lane Cove West	Commercial
Multiple business occupants including; Meridian Motor Co, Greenlight Fleet Services, Kaydon Filtration	13 Sirius Road, Lane Cove West	Commercial
Multiple business occupants including; Lane Cove Gymnastics Club, Club Pilates, Proxi-mate	87 Mars Road, Lane Cove West	Commercial

Renew IT	91 Mars Road, Lane Cove West	Commercial
Kanes Hire	15 - 19 Sirius Road, Lane Cove West	Commercial
Multiple business occupants including; Stone and Tile projects, Big Swing Golf Lane Cove, Elevator Services Group	2-6 Orion Road, Lane Cove West	Commercial
Multiple business occupants including; Green Gourmet Vegan Lane Cove West, BBQ School, Venus Automation	79-85 Mars Road, Lane Cove West	Commercial
Multiple business occupants including; Carlie Swim Lane Cove West, Clarity Cru Wine Merchants	4 Sirius Road, Lane Cove West	Commercial