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ROBERTS ROAD DATA CENTRE (SSD-10330) - RESPONSE TO SUBMISSIONS

Prepared for
CANBERRA DATA CENTRES PTY LTD
28 May 2020

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Report Number	Final

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1. INTRODUCTION

This Response to Submissions Report (RtS) has been prepared in response to the agency submissions received during the public exhibition of the Environmental Impact Statement (EIS) for a State Significant Development (SSDA 10330) of a data centre at 17 Roberts Road, Eastern Creek (the Proposal).

The exhibition of the development application and Environmental Impact Statement (EIS) ended on 31 January 2020. No community submissions were received.

The following agency and organisation submissions were received:

- The Environment, Energy and Science Group confirmed the Biodiversity Development Assessment Report (BDAR) to be adequate and requested to clarify the terminology used to describe the patch of planted vegetation in the BDAR;
- Environmental Planning Authority (EPA) requested further information on chemical storage, air and noise assessment and licensing requirements under clause 17 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act);
- Blacktown Council recommending conditions of consent;
- Transport for New South Wales (TfNSW) and Roads and Maritime Services (RMS) recommending conditions of consent;
- Sydney Water recommending conditions of consent;
- The recommendations and comments previously provided by Endeavour Energy remain valid. Endeavour Energy's Network Connections Branch are managing the conditions of supply with the proponent and their Accredited Service Provider (ASP) - no further comments;
- TransGrid requested that the developer notifies TransGrid prior to digging to ensure TransGrid is prepared for any unforeseen issues that may arise - no further comments; and
- WaterNSW does not have further comments.

All agency responses received to date were supportive of the development on the basis of further information being provided or as detailed in the recommended conditions of consent.

In addition, the Department of Planning, Industry and Environment (DPIE) requested the following additional information:

- Relationship between SSD-10330 and 10_0142;
- Additional detail on specific mitigation measures which would be installed to ensure compliance with the night-time PNTL at Flavex Lane under temperature inversions;
- Updated landscape masterplan in accordance with Blacktown City Council submission; and
- Consultation with the EPA.

Following the lodgement of the EIS and further detailed design process, minor internal layout changes and generator enclosures amendments were made to the architectural plans. These amendments are largely internal and will not create additional environmental impact than what has already been assessed in the EIS and the updated technical reports. Therefore, we do not believe the EIS is required to be re-exhibited.

Summary of changes are discussed in Section 2 of this report. The updated architectural plan and technical reports attached at Appendix B to Appendix J all reflect these changes.

This Response to Submissions Report provides the following:

- Summary of amendments
- Response to DPIE request for additional information
- Response to EPA request for additional information
- Response to BDAR requirements

- Response to proposed conditions of consent – Agencies.

The Response to Submission Report is accompanied by the following updated plans and technical reports:

- Architectural Plan
- Landscape Masterplan
- Air Quality Report
- Addendum Acoustic Assessment Report – addendum to the original Acoustic Report prepared by SLR
- SEPP 33 Review and accompanying statement
- Dangerous Goods Assessment Report
- Waste Management Plan
- Service Infrastructure Report
- Fire Compliance Report
- Biodiversity Development Assessment Report
- Hydraulic Services Response Statement

2. SUMMARY OF AMENDMENTS

Following the lodgement of the EIS and further detailed design process, minor internal layout changes and generator enclosures amendments were made to the architectural plans.

The changes are summarised below (refer to Figure 1 for updated site plan):

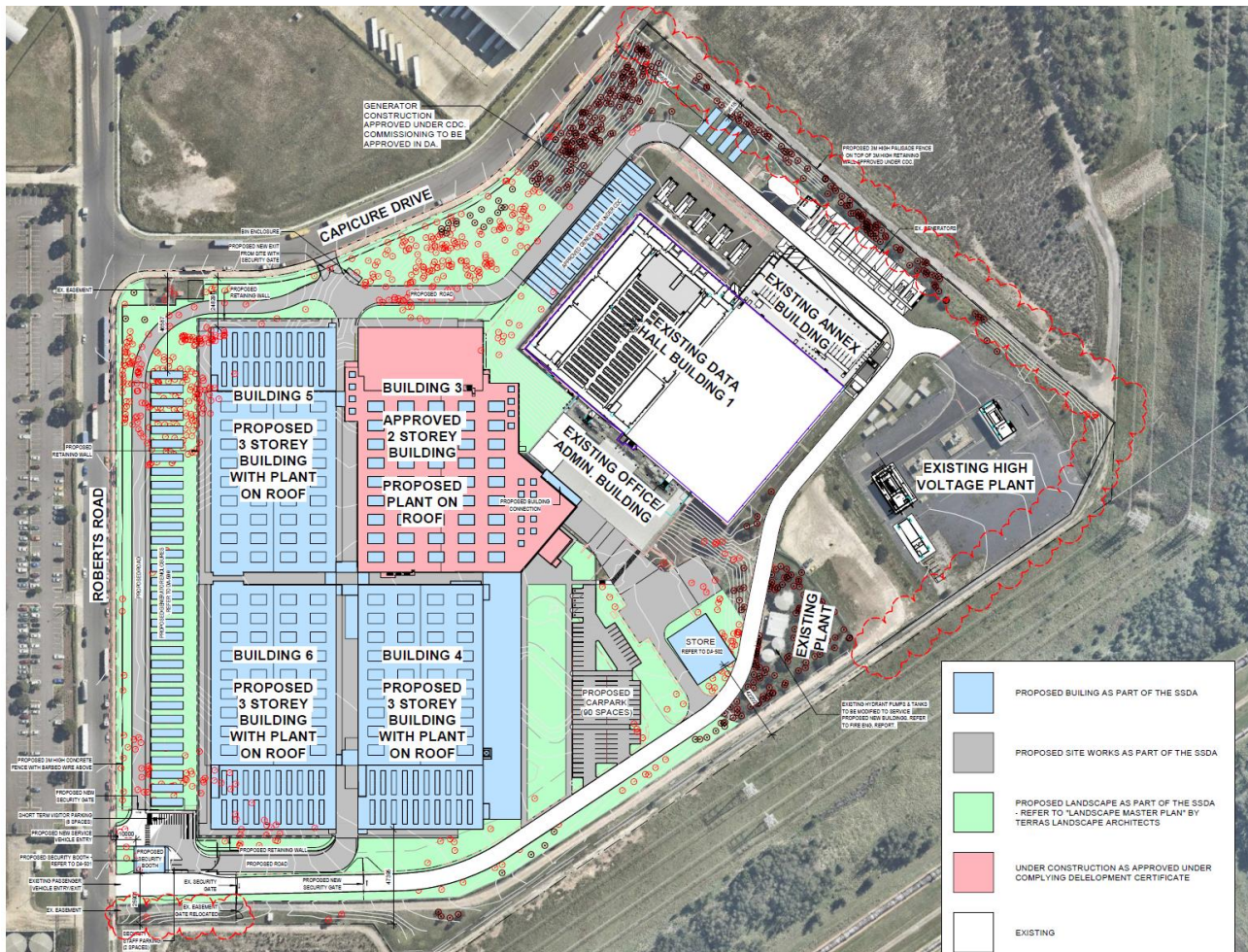
- Housing the 36 generators in individual enclosures and relocate 4 generators to the northeast of the site.
- The 12 generators located to the north of the site were approved under Complying Development Certificate for installation only (ref. no. 5809/3). These generators have now been included in the SSDA scope to seek consent for the commissioning and operation of these generators. The total number of backup generators servicing the proposed Data Centre is retained - 48 in total.
- Amend internal warehouse layout to accommodate additional storerooms and switch rooms to satisfy data centre servicing requirements.
- Raise the chiller deck to level 2 to create additional roof space below for the storeroom and switch rooms (refer to Figure 2). The maximum height of the building is retained.
- Extending the palisade fence along the north-eastern boundary of the site.

As the result of providing additional switch rooms and storerooms, the warehouse, office and plant room gross floor area (GFA) have also changed:

Table 1 Changes to GFA

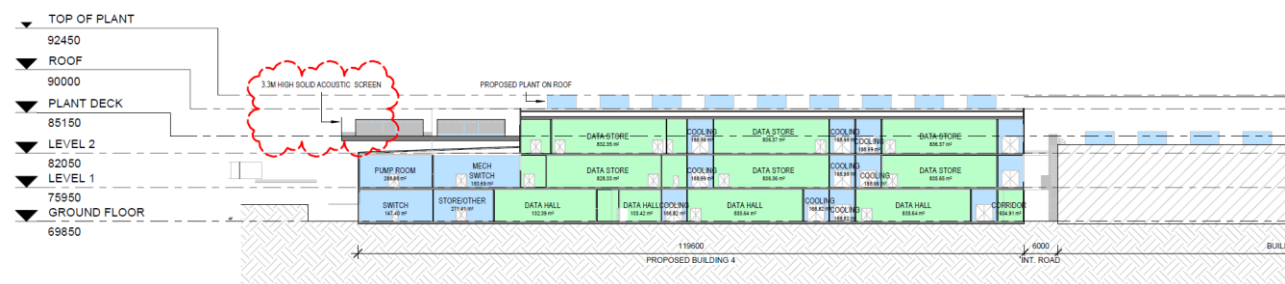
	EIS Submission	Post Lodgement
Office GFA	5,278.78sqm	5,486.98sqm
Warehouse GFA	38,833.83sqm	36,735.71sqm
Plant room GFA	22,036.64sqm	23,338.89sqm

Figure 1 Updated Site Plan



Source: EJE Architecture

Figure 2 Updated Section



Source: EJE Architecture

In addition to the updated technical reports responding to DPIE and agency comments, the following reports are also updated to reflect the changes mentioned above:

- Waste Management Plan attached at Appendix G
- Service Infrastructure Report attached at Appendix H
- Fire Compliance Report attached at Appendix I

Waste Storage Area

SLR has reassessed the updated floor plans and the change in GFA and has concluded the following:

In accordance with Council's requirements, the updated architectural drawing "DA-001" shows that the proposal has its own allocated waste storage room labelled "Bin Enclosure".

Review of the updated architectural drawing "DA-001" indicates that the allocated area for the "Bin Enclosure" is 23sqm, which is consistent with the recommended bin enclosure area requirement outlined in the report.

Therefore, the allocated waste storage area is sufficient to store the estimated quantities of operational waste, recycling and bulky waste in between collections and also provide enough additional storage space for storage of an e-waste collection bin.

Service Infrastructure

The Service Infrastructure Report has been updated to include the 12 generators approved under a Complying Development Certificate. The proposal is seeking the commissioning and operation of a total 48 generators.

Fire compliance

Fire compliance report has been updated to reflect the updated layout changes. The building design and site configuration has been assessed against the minimum compliance requirements of the *National Construction Code, Volume 1 2019*.

The assessment concludes that any non-compliances to the prescriptive NCC 2019 requirements for fire safety have been identified. To ensure an acceptable level of fire safety is maintained for the proposed new development, a Fire Engineering Brief will be prepared in accordance with the *International Fire Engineering Guidelines 2005 (IFEG)*, detailing the proposed assessment parameters. This FEB will be accompanied by a Fire Engineering Brief Questionnaire (FEBQ) submission to Fire and Rescue NSW for review and comment.

Lucid will prepare a Fire Engineering Report (FER) to the satisfaction of the Principle Certifying Authority (PCA). Approval of the FER shall be obtained prior to issue of the Construction Certificate.

Overall, the proposed amendments are largely internal and do not result in additional height or a significant increase in GFA. Therefore, the amendments will not create significant additional environmental impacts than what is already assessed in the EIS and the updated technical reports, and we do not believe the EIS is required to be re-exhibited.

3. RESPONSE TO DPIE REQUEST FOR ADDITIONAL INFORMATION

3.1. RELATIONSHIP BETWEEN SSD-10330 AND 10_0142

Canberra Data Centres do not wish to surrender the existing data centre approval under 10_0142, and do not wish to consolidate the existing data centre with the proposed.

This SSDA is an extension to the existing data centre facility but the proposed data centre will be operated by a different operator, therefore approval should be kept separate.

3.2. POTENTIAL NOISE IMPACTS AT FLAVEX LANE

Stantec prepared an Addendum Noise Impact Assessment and is attached at Appendix D.

The addendum report provided additional noise modelling to assess cumulative noise emissions from diesel generators operating under all circumstances (testing and maintenance, emergency and power outage) in accordance with the requirements of the *Noise Policy for Industry 2017*.

Detailed noise modelling result is discussed in Section 4.3.

The addendum report recommended the following mitigation measures to ensure the PNTLs is maintained for Flavex Lane during daytime, night-time and under temperature inversion:

- A solid acoustic barrier should be implemented in the design, with height 3300mm above the FFL of the plant deck.
- An acoustic louvre should be implemented in the design with height 3300mm above the FFL of the plant deck.

The acoustic barrier and louvre have been incorporated in the updated Architectural Plan as shown on Roof Plan - DA-103 Rev. F and Elevation Plan - DA-200 ver. E.

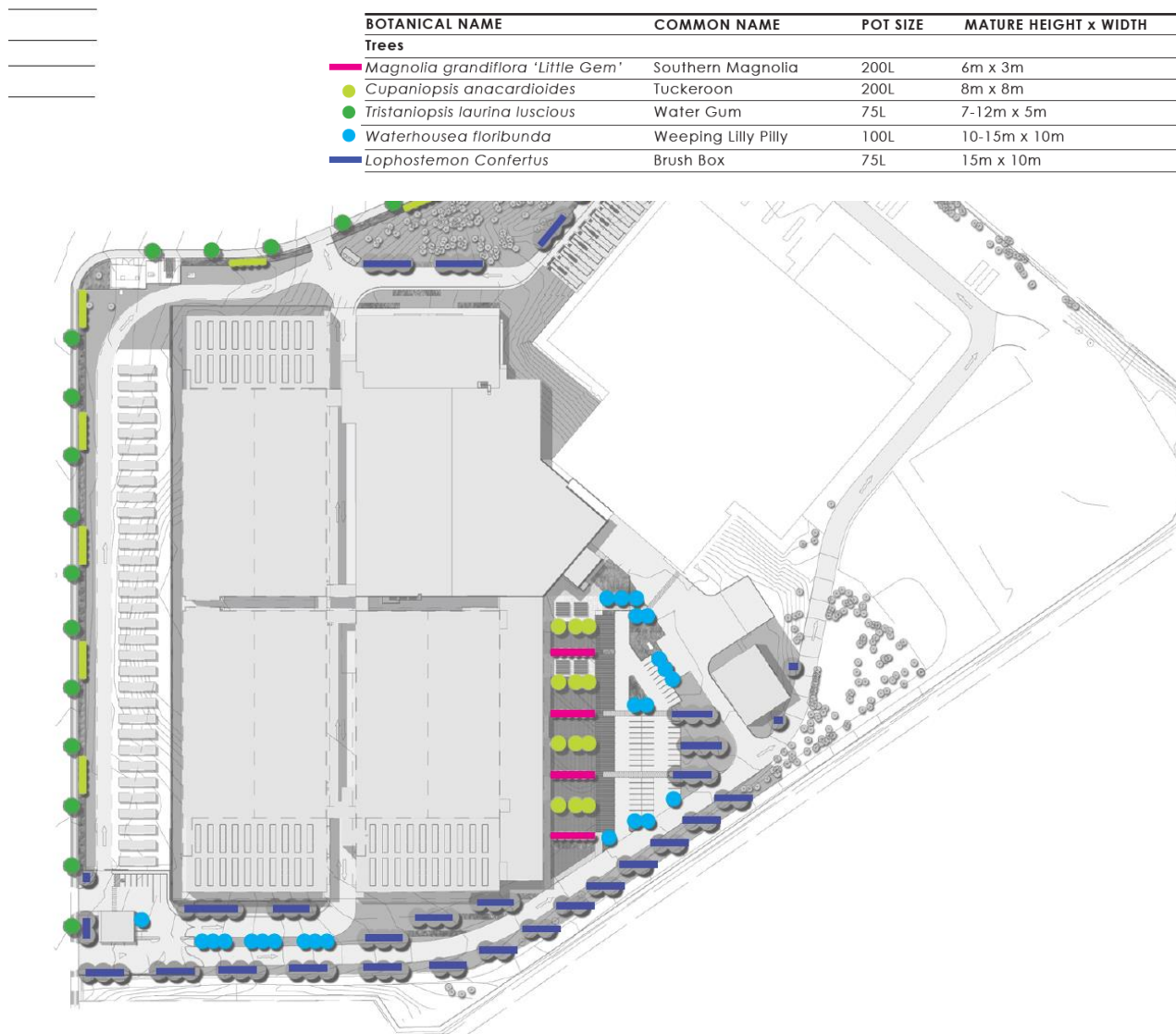
3.3. LANDSCAPING

In accordance with Blacktown City Council's comments, landscape masterplan has been updated to replace the following species (refer to Figure 3):

- *Pyrus calleryana* 'Capital' trees have been replaced with *Lophostemon confertus* 'Brush Box', which will provide a larger tree canopy (mature height of 15m x 10m wide) along internal roadways to the north and south of the data centre building.
- *Elaeocarpus grandis* trees have been replaced with *Cupaniopsis anacardioides* 'Tuckeroo', which will provide shade and is better suited to the local climate.

The updated landscape masterplan with detailed species schedule is attached at Appendix B.

Figure 3 Updated Landscape Masterplan



Source: Terras Landscape Architect

3.4. CONSULTATION WITH EPA

A virtual meeting was held between the project team, EPA and DPIE on 11 May 2020, to discuss the following issues raised in EPA's submission:

- Backup Generator Electricity Generation
 - individual capacity;
 - testing procedure, frequency and duration;
 - confirmation that testing will be carried in clusters and during day time;
 - maximum operating time in an emergency situation.
- Chemical Storage
- Air Assessment
- Noise Assessment

The project team clarified the generator testing regime and confirmed the chemical storage capacity onsite. The project team also presented the additional air quality and noise assessment, which is discussed in detailed in Section 4 of this RtS.

EPA confirmed that the additional air and noise assessment was adequate and felt that the impacts are appearing to be within acceptable limits. EPA will review the updated reports in detail.

4. RESPONSE TO EPA REQUEST FOR ADDITIONAL INFORMATION

4.1. LICENSING REQUIREMENTS

Emergency Power Generators

The proposed Data Centre is serviced by uninterruptible power supplies (UPS) with battery back-up for power conditioning and short-term interruptions, however, standby generators are required to ensure ongoing operation, in the event that mains grid electricity supply is interrupted for more than few minutes. The function of the standby generators is to provide power when there is an unexpected interruption of mains grid electricity.

During the operational phase, the emergency generators will be undergoing testing and operating in the event of a power failure.

The testing regime of the emergency power generators are, as follows:

Parameter	Value
Run time per test	60 minutes
No of generators per test	5 (Maximum, including existing generators)
Number of tests per day	1
Testing schedule	Monday to Friday (9 am to 5 pm)
Total testing time	12 hours / annum / generator

The above mentioned testing regime and generator engine specifications forms the bases of both acoustic and air quality assessment.

In general, power interruptions last anything from a few seconds to a few hours and therefore even when required under power failure emergency the generators would only operate for a short amount of time.

As major power interruptions requiring the simultaneous operation of all standby generators would only occur very infrequently and for a limited time period, modelling of impacts during this emergency scenario has not been undertaken for the air quality assessment. The emergency scenario has been undertaken for noise assessment.

The applicable Cummins QSK95-G4 diesel engine technical specifications is attached at Appendix C of the Air Quality Report.

Electricity Generation

Clause 17 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) relates to scheduled activity for electricity generation. Clause 17(1A) states the following:

'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'.

The total testing time of 48 generators will tally over 200 hours per year, however each generator is only been tested for 12 hours per year. While use of all generators in a power outage will not exceed 200 hours per year.

It is our understanding that this clause relates to a single electricity plant, which is a single generator. The total testing time of a generator (plant) is only 12 hours per year. Furthermore, given a power outage event would only occur very infrequently and for a limited time period, the actual operation of all the generators in a power outage scenario will not exceed 200 hours per year. Accordingly, the proposal is not required to obtain an environmental protection licence for electricity generation.

In addition, the noise and air quality emissions under worst case testing scenario is negligible and can be mitigated by mitigation measures. This is discussed in detail in the following sections of the report.

To further ensure compliance under Clause 17 of Schedule 1 of POEO Act, we propose to include the following Condition in the Condition of Consent:

Back-up Generators

The Applicant must ensure the on-site generation of electricity during emergency operations does not exceed 200 hours a year.

This condition has been adopted from the approved Data Centre at 1 Sirius Road, Lane Cove West (SSD-9741), where the proposed 80 diesel back up generators with regular load testing is not constitute a scheduled activity under the POEO Act.

The assessment report from DPIE concluded that:

Once they have reached full load, 80 diesel back-up generators would be used to provide continuous power to the development until power has been restored by Ausgrid (see Figure 8). The Applicant's client would ensure the back-up generators are not used to generate electricity for more than 200 hours each year.

In order to ensure the development can function during a power outage event, the Applicant's client would also undertake regular load testing of each back-up generator. During testing, an artificial load would be applied to each generator using an electrical switching device, for a period of up to one hour. The client would ensure testing is undertaken during the daytime period (i.e. from 8:00 AM to 6:00 PM), with one generator tested at a time.

....

The development does not constitute a scheduled activity under the Protection of the Environment Operations Act 1997 (POEO Act) (see Section 6.3). Therefore, an Environment Protection Licence (EPL) is not required.

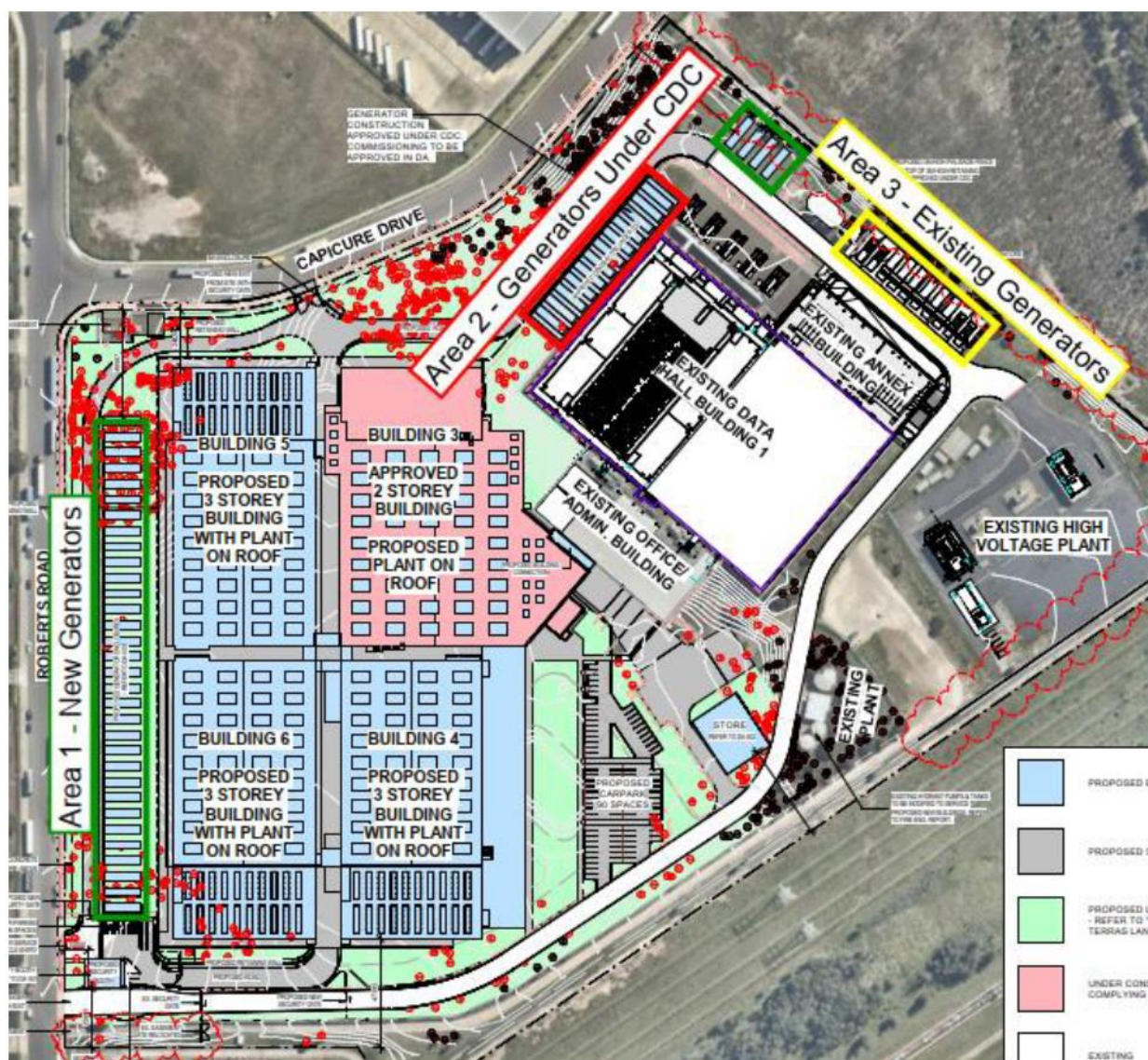
Chemical Storage

A statement prepared by Lote Consulting (attached at Appendix E) confirmed that the overall site accommodates a total of 58 diesel generators (refer to Figure 4):

- Area 1: As part of the SSDA, a total of 36 new generators are proposed to be installed in individual closures.
- Area 2: A total of 12 generators were approved for installation under a Complying Development Certificate (CDC). The CDC however did not approve for the commissioning of these generators; therefore these 12 generators have been included in the scope of the SSDA.
- Area 3: The existing data centre comprises of a total of 10 generators. Area 3 is excluded from the Dangerous Goods Assessment and the SEPP 33 Review, as they are existing generators and not part of the SSDA scope,

The proposed and existing generators all have a 33,000L day tank for the storage of diesel.

Figure 4 Site Plan showing generators onsite



Source: Lote Consulting

The total quantity of diesel (from the proposed and existing data centre) is summarised in the table below:

Generator Group	Number of Generators	Diesel Capacity per Generator (L)	Diesel Storage (L)	Diesel Storage (kg)***
Area 1 – New Generators	36	33,000	1,188,000	1,009,800
Area 2 – Generators Under CDC	12	33,000	396,000	336,600
Area 3 – Existing Generators	10	33,000**	330,000**	280,500
Total	58		1,914,000**	1,626,900

The total quantity of 1,914,000kg of diesel equates to 1,883 tonnes. The total combined diesel storage from the proposed and existing data centre does not exceed 2,000 tonnes, and the proposal does not trigger

clause 9, Schedule 1 of the *Protection of the Environment Operations Act 1997 (POEO) Act*. Accordingly, the proposal is not required to obtain a scheduled activities license for diesel storage.

The Dangerous Goods Assessment Report and the SEPP 33 Review Report have been updated to assess the storage of diesel in both area 1 and 2, and is attached at Appendix E and Appendix F. The outcome of the Dangerous Goods Assessment and the SEPP 33 Review remain unchanged, as diesel is a combustible liquid.

4.2. AIR ASSESSMENT

The updated Air Quality Assessment report (attached at Appendix C) included a desktop assessment of the potential air quality impacts associated with the testing of the back-up generators.

As major power interruptions would only occur very infrequently and for a limited time period, modelling of impacts from simultaneous operation of all standby generators during the emergency scenario has not been undertaken. The air quality assessment focuses on assessing the potential worst-case impact associated with the typical testing of five generators simultaneously.

In order to assess the worst case scenario, the modelling undertaken for the testing of generators assumes that:

- Each generator would be tested for a period of 60 minutes.
- Five generators will be tested concurrently within the same hour.
- Testing of generators is conducted every hour of the year between 9am and 5pm - to assess the operation of the generators under varying meteorological conditions).

Potential air pollutants during the testing scenario are considered to be emissions associated with the combustion of fuel which include:

- carbon monoxide (CO)
- oxides of nitrogen (NOx)
- PM10 and PM2.5
- sulfur dioxide (SO₂)
- volatile organic compounds (VOCs)

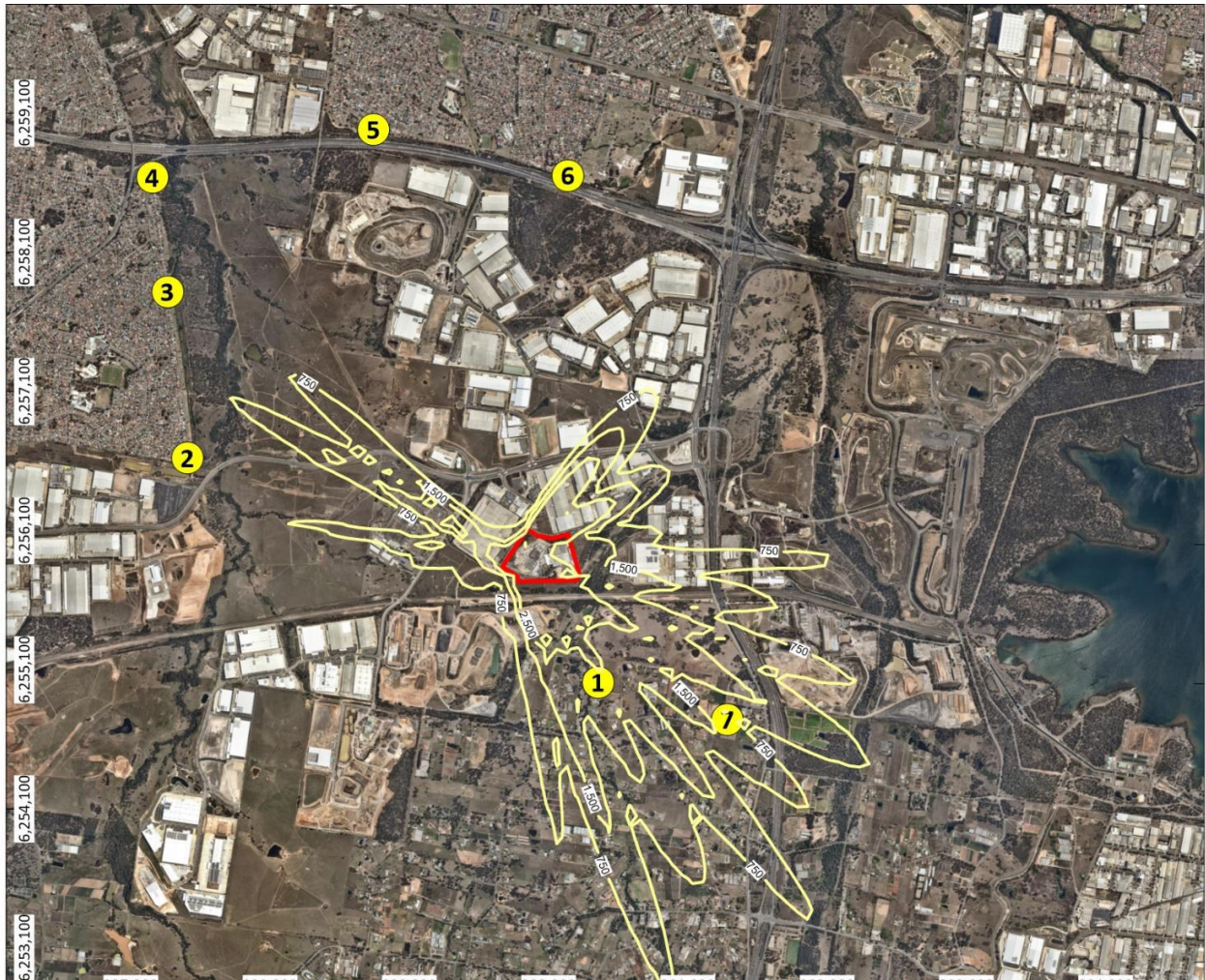
The air quality criteria for the pollutants during the testing scenario has been adopted from the Approved Methods published by Office of Environment and Heritage and the mass concentrations referenced below:

Pollutant	Averaging Time	Goal
PM ₁₀	24 hours	50 µg/m ³
	Annual	25 µg/m ³
PM _{2.5}	24 hours	25 µg/m ³
	Annual	8 µg/m ³
Deposited dust	Annual	2 g/m ² /month (maximum increase) 4 g/m ² /month (maximum cumulative)
NO ₂	1 hour	246 µg/m ³
	Annual	62 µg/m ³
CO	15 minutes	100 mg/m ³
	1 hour	30 mg/m ³
	8 hours	10 mg/m ³
SO ₂	10 minutes	712 µg/m ³
	1 hour	570 µg/m ³
	24 hours	228 µg/m ³
	Annual	60 µg/m ³

Based on information provided by the applicant, it is understood that the proposed backup generators will be Cummins QSK95-G4 diesel fired generators. The assessment has been undertaken based on the QSK95-G4 generator specification sheet, which includes details on fuel usage and pollutant emission rates. Background pollutant concentrations has been adopted from the hourly varying air quality data recorded by the St Marys AQMS.

Six sensitive receptors have been identified and considered in the assessment (refer to Figure 5).

Figure 5 Sensitive Receptors location



Source: SLR

The outcome of the assessment is summarised below:

Particulates

Given the insignificant incremental increase of particulate matter predicted at the identified receptors, additional exceedances of PM10 and PM2.5 criteria due to the testing of the generators are **considered unlikely**.

Table 19 Predicted PM Concentrations at Sensitive Receptors

Receptor ID	Increment ($\mu\text{g}/\text{m}^3$)	
	Maximum 24-Hour	Annual
R1	0.1	< 0.01
R2	< 0.1	< 0.01
R3	< 0.1	< 0.01
R4	< 0.1	< 0.01
R5	< 0.1	< 0.01
R6	< 0.1	< 0.01
R7	0.1	< 0.01

CO and SO₂

Given the insignificant incremental increase of CO and SO₂ predicted at the identified receptors, exceedances of the relevant criteria due to the testing of the generators are **considered unlikely**.

Table 22 Predicted CO Concentrations at Sensitive Receptors

Receptor ID	Increment (mg/m^3)		
	Maximum 15-Minute*	Maximum 1-Hour	Maximum 8-Hour
R1	0.2	0.2	0.02
R2	<0.1	<0.1	<0.01
R3	<0.1	<0.1	<0.01
R4	<0.1	<0.1	<0.01
R5	<0.1	<0.1	<0.01
R6	<0.1	<0.1	<0.01
R7	0.1	0.1	0.01
Criteria	100	30	10

* The 1-hour average CO concentrations predicted by the modelling were converted to 15-minute averages using the power law formula.

Table 23 Predicted SO₂ Concentrations at Residential Receptors

Receptor ID	Increment ($\mu\text{g} / \text{m}^3$)			
	Maximum 10-Minute*	Maximum 1-Hour	Maximum 24-Hour	Annual
R1	9	6	<1	<0.1
R2	<1	<1	<1	<0.1
R3	1	1	<1	<0.1
R4	<1	<1	<1	<0.1
R5	<1	<1	<1	<0.1
R6	<1	<1	<1	<0.1
R7	5	4	<1	<0.1
Criteria	712	570	228	60

* The 1-hour average CO concentrations predicted by the modelling were converted to 10-minute averages using the power law formula.

NO₂

The modelling results show that the predicted cumulative maximum 1-hour and annual average NO₂ concentrations **are below the relevant ambient air quality criteria** at all receptor locations modelled.

Table 20 Predicted NO₂ Concentrations at Sensitive Receptors

Receptor ID	Increment (µg/m ³)		Cumulative (µg/m ³)	
	Maximum 1-Hour	Annual	Maximum 1-Hour	Annual
R1	229	1.3	239	8.2
R2	34.5	0.36	80.5	7.2
R3	96.2	0.28	107	7.1
R4	24.1	0.19	79.4	7.1
R5	29.4	0.19	79.7	7.1
R6	28.2	0.23	80.2	7.1
R7	145	0.71	145	7.6
Criteria			246	62

A contemporaneous analysis of the ten highest 1-hour average NO₂ concentrations predicted at receptor R1 is presented in the table below. The contemporaneous analysis shows that the nine highest 1-hour average incremental NO₂ predictions occur at 5 pm.

Table 21 Assessment of Ten Highest Contemporaneous 1-Hour Average NO₂ Predictions at Receptor 1

Date / Time	1-Hour Average NO ₂ Concentrations (µg/m ³)			Date / Time	1-Hour Average NO ₂ Concentrations (µg/m ³)		
	Background	Predicted Increment	Cumulative Impact		Background	Predicted Increment	Cumulative Impact
Ten Highest Maximum Background Hours				Ten Highest Maximum Incremental Impact Hours			
06/05/2016 18:00	79.0	0.0	79.0	14/05/2016 17:00	9.4	229	239
07/05/2016 11:00	77.1	7.6	84.7	19/07/2016 17:00	28.2	161	189
06/09/2016 19:00	60.2	0.0	60.2	05/07/2016 17:00	9.4	125	134
06/05/2016 19:00	58.3	0.0	58.3	06/04/2016 17:00	0.0	84.6	84.6
13/12/2016 22:00	52.6	0.0	52.6	03/05/2016 17:00	1.9	80.5	82.4
04/07/2016 10:00	48.9	12.4	61.3	10/08/2016 17:00	5.6	70.1	75.7
08/11/2016 13:00	48.9	0.6	49.5	21/06/2016 17:00	5.6	69.2	74.8
07/05/2016 10:00	45.1	10.0	55.1	14/09/2016 17:00	0.0	68.7	68.7
29/04/2016 12:00	45.1	3.1	48.2	18/07/2016 17:00	1.9	66.8	68.7
11/05/2016 10:00	45.1	1.1	46.2	01/05/2016 16:00	0.0	66.4	66.4
Criteria			246	Criteria			246

The highest predicted incremental 1-hour average NO₂ concentration predicted from 9:00 am to 4:00 pm is 66.4µg/m³, which would not result in an exceedance of the 1-hour average NO₂ criterion, even if combined with the highest 1-hr average background NO₂ concentration recorded in the last five years (79.0µg/m³, recorded at 6:00 pm on 6 May 2016).

Based on the above, revising the proposed testing hours from 9:00 am - 5:00 pm to 9:00 am - 4:00 pm would reduce the likelihood of any exceedances at nearby R1 sensitive receptor even during days of exceptionally high NO₂ concentrations.

In conclusion, the potential off-site air quality impacts during the worst case testing conditions predicted no exceedance of the relevant ambient air quality. To further reduce the risk of any exceedances of the relevant air quality criteria, the following mitigation is proposed:

- Testing hours be revised to 9:00 am to 4:00 pm
- Undertaking routine maintenance of all generators and minimising storage of volatile chemicals on-site.

4.3. NOISE ASSESSMENT

Stantec prepared an Addendum Noise Impact Assessment and is attached at Appendix D.

The addendum report provided additional cumulative noise assessment against the requirements of the NSW EPA's *Noise Policy for Industry* (NPfI). The noise model assess noise emissions from the operation of the diesel generators operating under the following scenarios:

- Scenario 1 – Mechanical plant and equipment operating under a testing and maintenance regime in accordance with the testing regime shown in Section 4.1 of this RtS.
- Scenario 2 – Mechanical plant and equipment operating and the diesel generators operating during an emergency or power outage - all generators operating.
- Scenario 3 – Contribution of Diesel generators operating during an emergency or power outage only - all generators operating.

The testing regime is in-line with the recommendation provided by EPA, as testing of diesel generators will be conducted between 9am – 5pm, which falls within the daytime period defined in the NPfI: 7am – 6pm.

Noise emissions from the operation of the proposed development have been assessed in accordance with the requirements of the Noise Policy for Industry. This includes the following main industrial noise sources associated with the proposed development:

- 48 diesel generators serving the precinct.
- Mechanical plant and equipment located on the rooftop of Building 3.
- Mechanical plant and equipment serving Buildings 4, 5 & 6.

The cumulative noise emissions from each of the listed industrial noise sources have been modelled in SoundPLAN 8.1 to accurately quantify the noise impacts on surrounding noise-sensitive receivers and to also assess the noise mitigation measures required to meet the Project Noise Trigger Levels (PNTLs).

It should be noted the noise impact of generator testing and maintenance is insignificant in comparison to the operation of mechanical plant and equipment serving Buildings 4, 5 & 6 because:

- The noise emissions from the diesel generators are generally shielded by the development structures when considering the nearest noise-affected receivers, such as Flavex Lane.
- Diesel generators are proposed to be tested during the daytime period only (9am – 5pm).
- A maximum of five (5) diesel generators will be tested at certain times in accordance with the testing regime.

The project trigger noise levels for surrounding noise-sensitive receivers have been established previously within the Noise Impact Assessment prepared by SLR Consulting dated 12th November 2019. These continue to form the basis of this updated assessment.

The results of noise modelling at each of the surrounding noise-sensitive receivers under the three scenarios are provided below:

Table 2: Results of noise modelling and predicted noise levels – Scenario 1 (Testing & Maintenance)

Location	Period	PNTL	Predicted Noise Levels – $L_{Aeq,15min}$ (dB(A))			Complies? Yes/No
		$L_{Aeq,15min}$	Calm	Prevailing Winds	Temperature Inversion	
Flavex Lane	Daytime	43	36	34	-	Yes
	Evening	41	36	-	-	Yes
	Night-time	38	34	-	37	Yes
Cetus Place	Daytime	43	27	24	-	Yes
	Evening	41	27	-	-	Yes
	Night-time	38	24		27	Yes
Commercial – North	When In Use	63	53	61	-	Yes
Commercial - West	When In Use	63	50	55	-	Yes
Industrial - North	When In Use	68	53	62	-	Yes

It is noted that during testing and maintenance of the generators, PNTLs has not been exceeded at nearby sensitive receivers including Flavex Lane at daytime and night time and under temperatures inversion, subject to noise mitigation measures being implemented. The noise mitigation measures are discussed in the section below.

Table 3: Results of noise modelling and predicted noise levels – Scenario 2 (Emergency & Power Outage)

Location	Period	PNTL	Predicted Noise Levels – $L_{Aeq,15min}$ (dB(A))			Complies? Yes/No
		$L_{Aeq,15min}$	Calm	Prevailing Winds	Temperature Inversion	
Flavex Lane	Daytime	43	39	36	-	Yes
	Evening	41	39	-	-	Yes
	Night-time	38	36	-	39	No
Cetus Place	Daytime	43	32	26	-	Yes
	Evening	41	32	-	-	Yes
	Night-time	38	33		29	Yes
Commercial – North	When In Use	63	62	66	-	No
Commercial - West	When In Use	63	60	62	-	Yes
Industrial - North	When In Use	68	62	66	-	Yes

Note 1: This exceedance of noise levels during an emergency and power outage scenario should not provide a significant risk to the receiver at Flavex Lane and Commercial – North.

Table 4: Results of noise modelling and predicted noise levels – Scenario 3 (Emergency & Power Outage)

Location	Period	PNTL	Predicted Noise Levels – $L_{Aeq,15min}$ (dB(A))			Complies? Yes/No
		$L_{Aeq,15min}$	Calm	Prevailing Winds	Temperature Inversion	
Flavex Lane	Evening	41	36	-	-	Yes
	Night-time	38	33	-	36	Yes
Cetus Place	Evening	41	33	-	-	Yes
	Night-time	38	33		29	Yes
Commercial – North	When In Use	63	62	66	-	No
Commercial - West	When In Use	63	60	62	-	Yes
Industrial - North	When In Use	68	62	66	-	Yes

It is noted, that during emergency and power outage, the PNTLs at Flavex Lane have been exceeded by 1db(a) at night time and under temperature inversion. The PTNL for the commercial development to the north of the site is also exceeded by 3 db(a) under prevailing winds. These exceedances are minor.

More importantly, EPA acknowledged in the submission letter that the operation of the diesel generators under an emergency and power outage scenario is unlikely to adverse impacts to surrounding noise-sensitive receivers and it is unreasonable to recommend time specific conditions for emergency use of the generators.

Accordingly, we request that noise criteria do not apply during a power outage event, given the rarity of such an event occurring and the insignificant impact demonstrated above.

To meet the PNTLs during the testing and maintenance of the generators, the following noise mitigation measures have been recommended:

- A solid acoustic barrier should be implemented in the design in the location shown in Figure 6, with height 3300mm above the FFL of the plant deck. The performance of the solid acoustic barrier shall meet the minimum transmission loss values for each octave band centre frequency shown below.
- An acoustic louvre should be implemented in the design in the location shown in Figure 6, with height 3300mm above the FFL of the plant deck. The performance of the acoustic louvre shall meet the minimum transmission loss values for each octave band centre frequency shown below.

The acoustic barrier and louvre have been incorporated in the updated Architectural Plan as shown on Roof Plan - DA-103 Rev. F and Elevation Plan - DA-200 ver. E.

Figure 6 Acoustic Barrier location

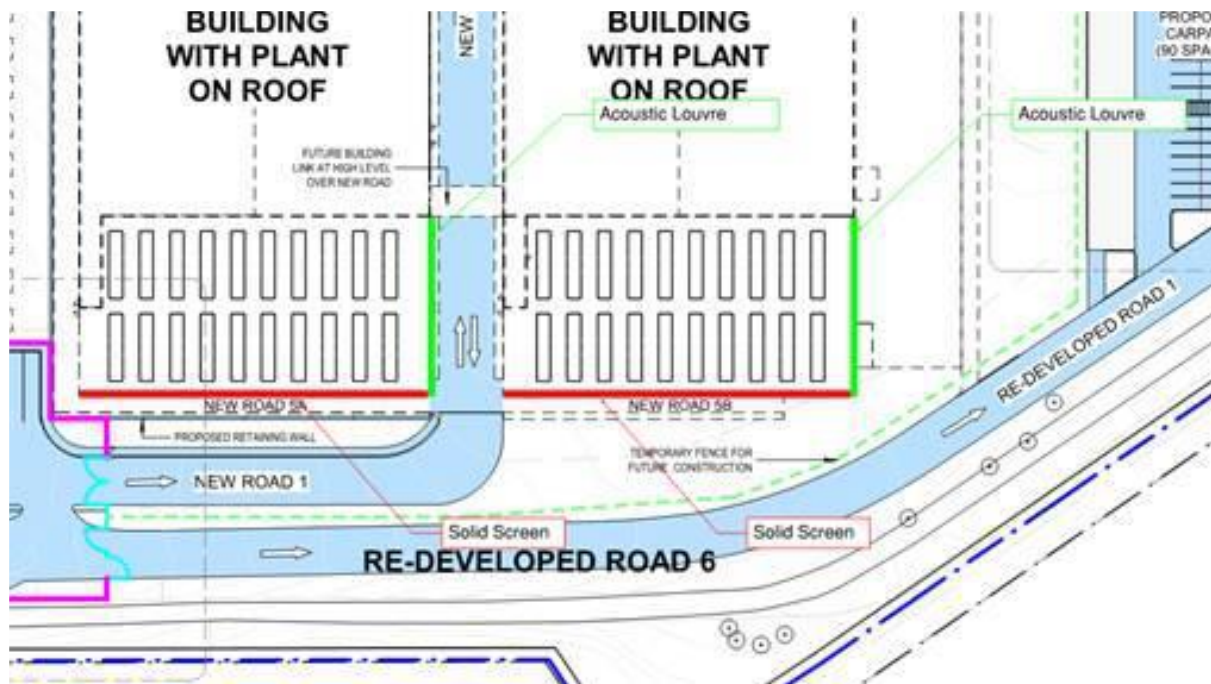


Table 5: Acoustic barrier transmission loss values

Item	Transmission Loss dB					
	125 Hz	250 Hz	500 Hz	1 kHz	2 kHz	4 kHz
Solid Acoustic Barrier	19	24	28	33	31	34
Acoustic Louvre	9	14	19	21	24	24

Source: Stantec

In conclusion, the proposal can comply with the relevant noise and vibration criteria controls established for the project subject to the implementation of the mitigation measures discussed above.

5. RESPONSE TO BDAR REQUIREMENTS

The BDAR prepared by SLR has been updated to provide consistent description of the existing vegetation onsite, including the one patch of regrowth vegetation and planted vegetation. The updated BDAR is attached at Appendix J.

Impacts on fauna habitat within the site area are limited in extent and will involve the loss of a relatively small and isolated patch of River-flat Eucalypt Forest, as well as a larger area of previously mined land that has been historically rehabilitated using exotic vegetation.

There is no change to the amount of native vegetation clearing, and hence no change to offset credit calculations.

The following chapters of the BDAR have been updated to provide consistent description of the exotic vegetation onsite:

Executive summary

The remaining majority (14.4ha) of the site comprises previously mined land with no natural soil profile that has already been developed in-part as the datacentre, or that has been historically rehabilitated using exotic vegetation.

Chapter 3.1.2

The remainder of the vegetated areas (approximately 3ha) within the Project Site comprise previously mined land with no natural soil profile, and which has been historically rehabilitated using exotic vegetation, or recently landscaped as part of the datacentre in the east of the site.

Chapter 3.1.3

Other areas of vegetation comprise landscaping around the completed datacentre in the east of the site, or previously mined land with no natural soil profile, and which has been historically rehabilitated using exotic vegetation.

Chapter 3.2.1

Native plant species recorded on site comprise the following plant groups: five forbs, ten grass or grass-like species (including tussocks, sedges and rushes), four shrubs and eight trees. These were generally recorded in areas of the site that have been recently landscaped, or as isolated individuals in exotic rehabilitation, or from the patch of native vegetation in the northwest corner of the site.

Chapter 3.5

The available habitat for native fauna species within the Project Site is therefore restricted to the small, isolated, patch of River-flat Eucalypt Forest, and to a limited extent, the areas of recent landscape planting and historic exotic rehabilitation.

Chapter 3.6.4

Given that the Project Site exists within a highly disturbed environment, consisting of a small patch of River-flat Eucalypt Forest surrounded by exotic vegetation, the habitat is considered unsuitable for all Candidate Species Credit Species resulting in no Species Credit Species requiring survey.

Chapter 4.1

Additionally, the site is located on land zoned for industrial purposes within an existing industrial precinct at Eastern Creek on land that is the site of a former quarry, with minimal native vegetation present.

Chapter 4.2.2

Impacts on fauna habitat within the Project Site will be in general limited in extent and will involve the loss of a relatively small and isolated patch of River-flat Eucalypt Forest, as well as a larger area of previously mined land that has been historically rehabilitated using exotic vegetation. Impacts on fauna habitat will comprise:

- removal of a small number of early mature native forest trees, being Rough-barked Apples that exist within the small forest/woodland patch;*
- removal of areas of historic rehabilitation that used exotic plants; and*
- removal of grassy ground cover layer in the woodland patch and across the remainder of the site.*

Chapter 4.4

•non-native vegetation is present on the site; however, these areas are not likely to be of any importance to the survival of any threatened biota in the locality.

Chapter 4.7.1

A large portion of the vegetation that will be removed by the proposed development comprises previously mined land with no natural soil profile that has been historically rehabilitated using exotic vegetation. Due to the degraded nature of these areas there is no potential for native vegetation or threatened species habitat, aside from some highly mobile threatened species of bats and birds.

Chapter 4.7.3

The remainder of the impact footprint includes previously mined land that has been rehabilitated using exotic grass and vegetation. These areas do not constitute native vegetation and do not require offset.

6. RESPONSE TO PROPOSED CONDITIONS OF CONSENT

Blacktown Council, Sydney Water and TfNSW/RMS recommended conditions of consent be included as part of the determination of this application. These are documented as follows, together with a summary of the Applicant's position on each of these conditions:

Table 2 Recommended Conditions of Consent - Agencies

Agency	Recommended Condition	Applicant Response
Blacktown Council	1.Biodiversity <i>Prior to issue of Construction Certificate conditions:</i> <i>1.The Mitigation and Management Measures (Section 4.6) shall be amended to include identification of responsibility and risk of failure for each mitigation measure and is to be amended to state that an appropriately qualified ecologist is on-site during all native vegetation clearance (not just in the event of injury to fauna).</i> <i>2.Upon completion of site clearance works, a short report shall be submitted by the ecologist to the consent authority and Council's Natural Areas Team providing details of the works and records of any wildlife spotted, relocated or rescued.</i>	The BDAR has been updated to address Blacktown Council's comments. Table 14 of the BDAR contains detailed mitigation and management measures during construction. Table 15 of the BDAR contains detailed mitigation and management measures during operation. Condition in relation to Biodiversity should be consolidated and reference the mitigation and management measures within the Biodiversity Development Assessment Report prepared by SLR dated 15 May 2020. Accordingly, we believe the Biodiversity Development Assessment Report can adequately address biodiversity issues and this condition is proposed to be removed.
	2.Street Tree <i>Prior to the issue of Construction Certificate conditions:</i> <i>1.The species along the driveway areas are to be changed to provide a species that will provide a larger tree canopy that the proposed Pyrus calleryana 'Capital' will not</i>	The Landscape Plan has been updated in accordance with Council's comments and is attached at Appendix B. Larger tree canopy (Brush Box with mature height of 15m x 10m wide) are proposed along the driveway areas.

Agency	Recommended Condition	Applicant Response
	<i>provide. Native larger canopy trees, are preferred, but exotic large canopy trees can also be used.</i> <i>2.The larger canopy size is required to help offset the canopy cover lost with tree removal for the development. The attached mark-up (at Attachment B) shows the location where larger canopy.trees should be included.</i> <i>3.The car park tree planting locations are suitable, but the species Elaeocarpus grandis is to be changed as it does not perform well in this area and is prone to frost damage.</i> <i>During construction conditions:</i> <i>1.Trees to be retained must be protected as per that report and as per AS:4970-2009 Protection of Trees on Development Sites.</i> <i>2.Existing vegetation and trees shall be left undisturbed except where roads, stormwater drainage infrastructure, site filling and/or building works are proposed.</i> <i>3.Prior to commencement of engineering works that may disturb existing vegetation/trees, the trees to be retained are to be identified and marked as per the Arboricultural impact Assessment Report. Proposed roads must be set-out on- site prior to this inspection. Note: Inspection must be carried out by Council's representative or an appropriately accredited private certifier. The applicant's representative must be p esent during this inspection .</i> <i>4.There is to be no storage of materials, stockpiling of excavated material or parking of plant/machinery within the drip line of the crown of any retained trees.</i> <i>5.Council must be notified a minimum of 24 hours prior to the removal of any branches from existing trees which are to be retained. Subject to Council's direction, this work must be generally undertaken by a qualified Arborist.</i>	Elaeocarpus grandis have been replaced by Cupaniopsis anacardioides, which is a common street tree species providing good shade and is a low maintenance plant. The tree canopy comments in Prior to the issue of Construction Certificate conditions 1 – 3 has been satisfied and is not required to be included in the final Condition of Consent. Noted. During construction, trees will be managed and protected as per <i>Australian Standard 4970 - Protection of Trees on Development Sites</i> and the tree protection measures included in the Arboricultural Impact Assessment Report prepared by Tree IQ dated October 2020.

Agency	Recommended Condition	Applicant Response
	6.All trees to be retained on site are to be protected in line with Australian Standard 4970 - Protection of Trees on Development Sites and as per the tree protection measures stated in the Arboricultural Impact Assessment Report.	
	3.Traffic Prior to the issue of Construction Certificate condition: 1.Provision is to be made on the plans for adequate sight distance for both pedestrian and vehicular movements at the proposed driveway in accordance with Section 3.2.4 AS 2890.1 and Figure 3.2 of AS 2890.1, to ensure safety of pedestrians on the footpath system and motor vehicles along the new driveway.	Noted.
	3.Environmental Health Operational conditions: 1.The development shall comply at all times with the recommendations and requirements of the following reports: ▪ Noise Impact Assessment, prepared by SLR, dated November 2019 Air Quality Assessment, prepared by SLR, dated October 2019 ▪ Preliminary Site Investigation, prepared by Douglas Partners, dated October 2019.	Noted. The development will comply at all times with the recommendations and requirements of the following reports (including the updated reports attached to the RtS): ▪ Noise Impact Assessment, prepared by SLR, dated November 2019. ▪ Noise Impact Assessment Addendum Report, prepared by Stantec, dated May 2020. ▪ Air Quality Assessment, prepared by SLR, dated May 2020 ▪ Preliminary Site Investigation, prepared by Douglas Partners, dated October 2019.
	3.Planning Operational conditions:	Noted.

Agency	Recommended Condition	Applicant Response
	<i>1. The approved 'high technology industry' shall comply with the requirements of the definition contained within Blacktown Local Environmental Plan 2015.</i> <i>2. The approved office spaces shall be used solely in conjunction with the high technology industry use of the building to which it is attached. The separate use or occupation of the approved office space(s) is not permitted by this consent.</i> <i>3. The development shall not be used or converted for use for any purpose other than that:</i> <i>a) granted consent by Council's Notice of Determination, or</i> <i>b) which is 'Exempt Development' under State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 or other NSW or Council planning instrument.</i> <i>4. Any change of use of the development, other than a 'high technology industry', will require separate development consent to be obtained from Council and will be required to provide the minimum number of car parking spaces as required by the Blacktown Development Control Plan 2015 for that new land use. Should the use of the site change in the future to a different industrial use, then a separate development consent will be required to ensure additional parking provision is accommodated along the north, north-western and south-eastern facades of the building in place of the redundant external plant areas and generators that must be removed.</i> <i>5. The development shall not include potentially hazardous or offensive storage establishments.</i>	To allow flexibility in future car parking assessment and arrangement, condition 4 is proposed to be modified as follows: <i>4. Any change of use of the development, other than a 'high technology industry' will be required to undertake car parking assessment under the relevant provision prescribed by TfNSW/RMS or the car parking rate under the Blacktown Development Control Plan related to that new land use.</i>
Sydney Water	A section 73 compliance certificate under the Sydney Water Act 1994 must be obtained from Sydney Water. The approved plans must be submitted to Sydney Water online service to determine whether the development will affect any Sydney Water sewer or water	Noted. C&M Consulting Engineers has submitted a Section 73 Compliance Certification application to Sydney Water for approval. The reference number of the Section 73

Agency	Recommended Condition	Applicant Response
	main, stormwater drains and /or easement, and if further requirements need to be met. Trade Wastewater Requirements If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission. Backflow Prevention Requirements All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum. Water Efficiency Recommendations Some water efficiency measures that can be easily implemented in your business are: ▪ Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, http://www.waterrating.gov.au/ ▪ Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to http://www.sydneywater.com.au/Water4Life/InYourBusiness/RWTCalculator.cfm ▪ Install water-monitoring devices on your meter to identify water usage patterns and leaks.	application is ref.185229. The project team can meet with Sydney Water if required post approval of the SSDA. Sellick Consultants has prepared a statement confirming the following (attached at Appendix K): ▪ The proposal does not generate trade waste. Cooling towers are not installed as part of this development. Accordingly, a trade waste application is not required. ▪ The site in accordance with Sydney Water's requirements is serviced by an existing Sydney Water supply with an existing testable double check valve installed, this is not proposed to be altered. ▪ For the new development, backflow prevention has been documented in accordance with <i>AS3500.1. for Zone and Individual protection</i>. ▪ Water efficient fixtures and fittings have been specified by the projects architect and have the following WELS ratings: a. Basin Mixers – 5 Stars (6L/min) b. Showers – 3 Star (8L/min) c. Sink Mixer – 4 Stars (7.5L/min) d. Rainwater is being captured and retained onsite for toilet flushing purposes. e. Toilets – 4 Stars (4.5/3L per flush)

Agency	Recommended Condition	Applicant Response
	▪ Develop a water efficiency plan for your business.	In addition, water efficiency measures has been incorporated as part of the project's ESD framework, detailed in the ESD report prepared by Cundall and was submitted with the EIS. Water efficiency measures includes: ▪ Efficient fittings and fixtures with high Water Efficiency Labelling and Standards (WELS) rating, and sensor operated taps; ▪ Rainwater harvesting for use in landscape irrigation and toilet flushing; ▪ Submetering of major water uses and sources; ▪ Building Management System to monitor, control, and optimise water usage at the operational stage; ▪ Specify native and / or low water use landscaping with subsoil drip irrigation and moisture sensors; ▪ Fire protection system to be design as a closed loop with water recirculation during testing; ▪ Passive stormwater management through permeable pavements, vegetated filter strips and bioretention areas, where possible
TfNSW/RMS	<i>A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate</i>	A draft Construction Traffic Management Plan (draft CTMP) prepared by Ason Group was submitted with the EIS.

Agency	Recommended Condition	Applicant Response
		The draft CTMP will be finalised and provided to Council for approval prior to the issue of the Construction Certificate (CC).
	<i>A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on Wallgrove Road or Old Wallgrove Road during construction activities.</i>	Noted.
	<i>The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1- 2004, AS2890.6-2009 and AS 2890.2 – 2002 for heavy vehicle usage. Parking Restrictions may be required to maintain the required sight distances at the driveway.</i>	The Traffic Consultant – Ason Group has confirmed that the car parking area has been designed in accordance with AS2890 series.
	<i>Sight distances from the proposed vehicular crossings to vehicles on Roberts Road and Capicure Drive are to be in accordance with the Austroads Guide to Road Design: Part 4A: Unsignalised and Signalised Intersections (Section 3 – Sight Distance) and AS 2890. Vegetation and proposed landscaping/fencing must not hinder sight lines to and from the vehicular crossings to motorists, pedestrians and cyclists.</i>	The Traffic Consultant – Ason Group has confirmed that sightline distances at the driveway will be compliant with AS2890 series.
	<i>All vehicles are to enter and leave the site in a forward direction.</i>	Noted.
	<i>All vehicles are to be wholly contained on site before being required to stop.</i>	Noted.

7. CONCLUSION

This Response to Submission Report has considered the submissions received from DPIE and EPA and the other six public agency submissions received during the exhibition of the EIS for the proposed data centre at 17 Roberts Road, Eastern Creek.

Following consideration of the authority submissions, the applicant has:

- Provided updated information where requested;
- Resolved to accept the majority of requested conditions;
- Provided detailed noise mitigation measures to minimise acoustic impact to Flavex Lane;
- The proposal is not required to obtain a scheduled activities license for diesel storage; and
- The proposal is not required to obtain a scheduled activities license for electricity generation, given the emergency operations is no more than 200 hours a year and the negligible air and acoustic impacts during testing.

Overall, the authorities review of the proposal has found that generally there are no significant adverse impacts associated with the SSDA and recommendations have been made for mitigation measures to further reduce these impacts during construction and operation.

Considering the above and the limited issues raised by Government Agencies, it is recommended that the Department approve this SSD Application subject to appropriate conditions.

DISCLAIMER

This report is dated 14 May 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of CANBERRA DATA CENTRES PTY LTD (**Instructing Party**) for the purpose of Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

ARCHITECTURAL PLAN

APPENDIX B

LANDSCAPE MASTERPLAN

APPENDIX C

AIR QUALITY REPORT

APPENDIX D

ADDENDUM ACOUSTIC ASSESSMENT REPORT

APPENDIX E

SEPP 33 REVIEW AND ACCOMPANYING STATEMENT

APPENDIX F

DANGEROUS GOODS ASSESSMENT REPORT

APPENDIX G

WASTE MANAGEMENT PLAN

APPENDIX H

SERVICE INFRASTRUCTURE REPORT

APPENDIX I

FIRE COMPLIANCE REPORT

APPENDIX J

BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT

APPENDIX K

HYDRAULIC SERVICES RESPONSE STATEMENT

