

DCI Poplars Data Centre Submissions Report

August 2025





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EXECUTIVE SUMMARY

NineZero DC Sub TC I Pty Ltd (trading as DCI Data Centers, or DCI) is proposing to develop a new state-of-the-art data centre in the Poplars Innovation Precinct at Jerrabomberra, in the Queanbeyan-Palerang local government area (LGA).

The proposal constitutes 'State Significant Development' under the *Environmental Planning and Assessment Act 1979* (EP&A Act), and consequently the Minister for Planning and Public Spaces is the consent authority for the development.

The Environmental Impact Statement (EIS) for the DCI Poplars Data Centre was publicly exhibited by the Department of Planning, Housing and Infrastructure (DPHI, the Department) from 25 March to 22 April 2025.

The Department received a total of 9 submissions in response to the exhibition. Of these submissions, 7 were received from government agencies while the remaining 2 were received from service providers. No submissions were received from the general public. None of the submissions formally objected to the project, although the submission from Council raised significant concerns regarding water usage of the proposed data centre.

The Submissions Report addresses the key themes identified from the submissions, including but not limited to hazards, heritage, traffic, and water usage. Feedback from agencies has been addressed and used to inform design refinements and additional mitigation and management measures.

In particular, DCI has amended the proposed cooling water system for the project, which would reduce potable water usage by around 90%. Other additional mitigation measures have also been proposed to address issues and recommendations raised in submissions.

With the implementation of these refinements and mitigation measures, it is considered that the development represents orderly development of the land.

As outlined in the EIS, the proposed data centre would have significant social and economic benefits for the Queanbeyan-Palerang LGA and the wider Canberra region, through the generation of approximately 24 high technology jobs at the facility, provision of increased data storage and high technology service opportunities, as well as a significant capital investment in the site.

It is respectfully requested that the Minister (or delegate), having due regard for the information submitted in the EIS and this Submissions Report, grants approval to the proposed DCI Poplars Data Centre Project.



1 INTRODUCTION

1.1 Overview

NineZero DC Sub TC I Pty Ltd (trading as DCI Data Centers, or DCI) is proposing to develop a new state-of-the-art data centre in the Poplars Innovation Precinct at Jerrabomberra, in the Queanbeyan-Palerang local government area (LGA).

The Poplars Innovation Precinct is a new business park which forms part of the broader development of the South Jerrabomberra locality in the Queanbeyan-Palerang LGA. The precinct is being developed by the estate owner, Poplars Developments Pty Ltd (Poplars). Poplars has recently undertaken estate development works, including subdivision, vegetation clearing, bulk earthworks and infrastructure development, in accordance with a development consent granted by Queanbeyan-Palerang Regional Council (Council) in July 2021.

The estate works included subdivision to create a 4.05 hectare lot for the proposed DCI Poplars Data Centre, on the corner of Tomsitt Drive, Environa Drive and Wolseley Place (the site). The site address is 2 Wolseley Place, Jerrabomberra NSW 2619, and the real property description of the site is Lot 6 in DP 1288362.

The site is located approximately 5 kilometres south-west of Queanbeyan and 10 kilometres south-east of Canberra near the NSW/ACT border (see **Figures 1 and 2**). It is conveniently located close to major transport and infrastructure links, including the Monaro Highway located about 2 kilometres to the west (via Lanyon Drive), and high voltage transmission lines located on the ACT/NSW border.

The key components of the proposed DCI Poplars Data Centre (the project) include:

- demolition and clearing (comprising minor services and grass/small shrubs only);
- bulk and detailed earthworks across the site;
- construction and operation of the data centre facility with a total IT capacity of up to 20 megawatts (MW) and total power consumption of up to 25.4 MW, including:
 - a single storey data centre building with a total building area of approximately 7,078m²; comprising 5 data halls, 2 ancillary offices and internal plant and service areas;
 - external plant areas with a total area of approximately 9,800m²; and
 - ancillary car parking, infrastructure and landscaping; and
- ancillary infrastructure and services to facilitate the development.

The project has an estimated development cost of approximately \$279 million (exc. GST), and would generate approximately 125 jobs during construction and 24 high technology jobs once operational.

The proposal constitutes 'State Significant Development' under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), and consequently the Minister for Planning and Public Spaces (or delegate) is the consent authority for the proposed development.

The Environmental Impact Statement (EIS) for the project was publicly exhibited by the Department of Planning, Housing and Infrastructure (DPHI, the Department) from 25 March to 22 April 2025. The Department received a total of 9 submissions in response to the exhibition, including 7 advices from government agencies and 2 submissions from service providers. No submissions were received from the general public.

On 23 April 2025, the Department requested that DCI formally respond to the issues raised in submissions. This Submissions Report has been prepared by PJEP Environmental Planning Pty Ltd (PJEP) on behalf of DCI, to provide a response to the issues raised in submissions and assist the consideration of the proposed development under the EP&A Act.

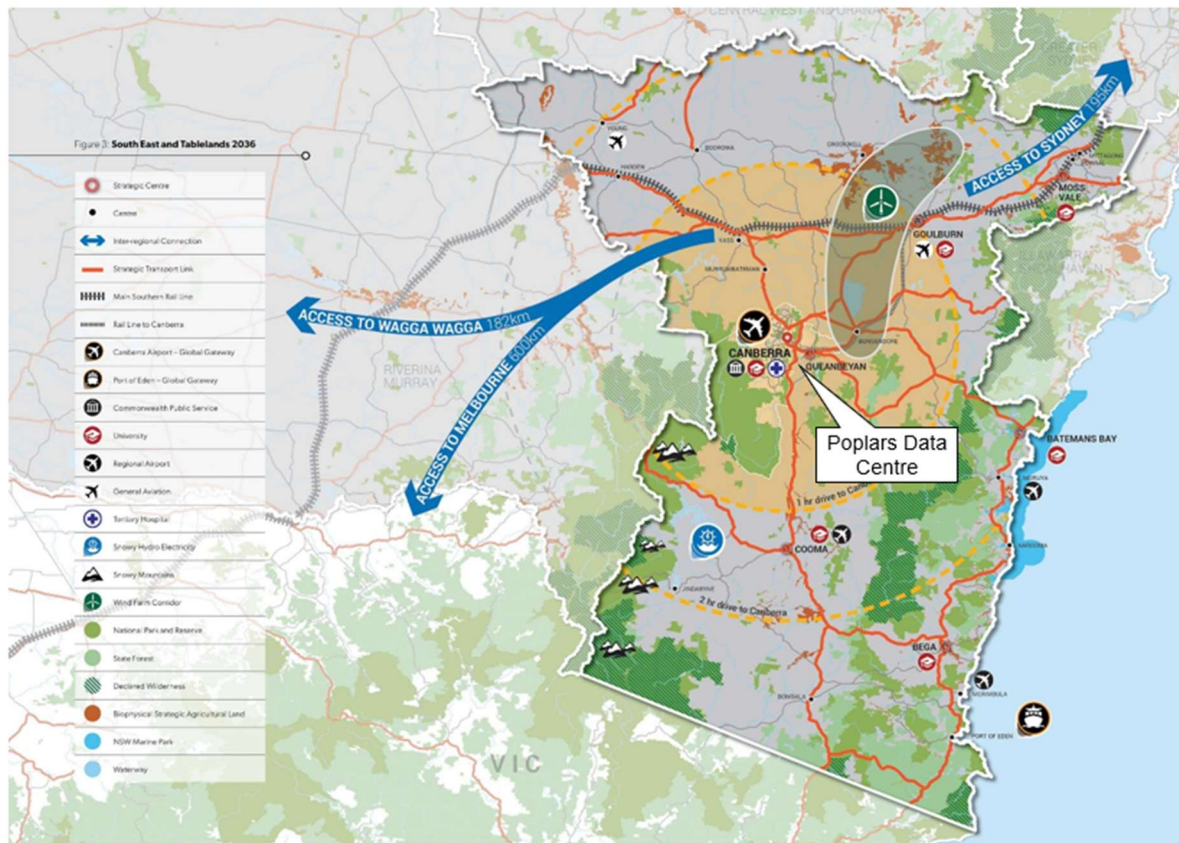


Figure 1: Regional Context (Source: Department)

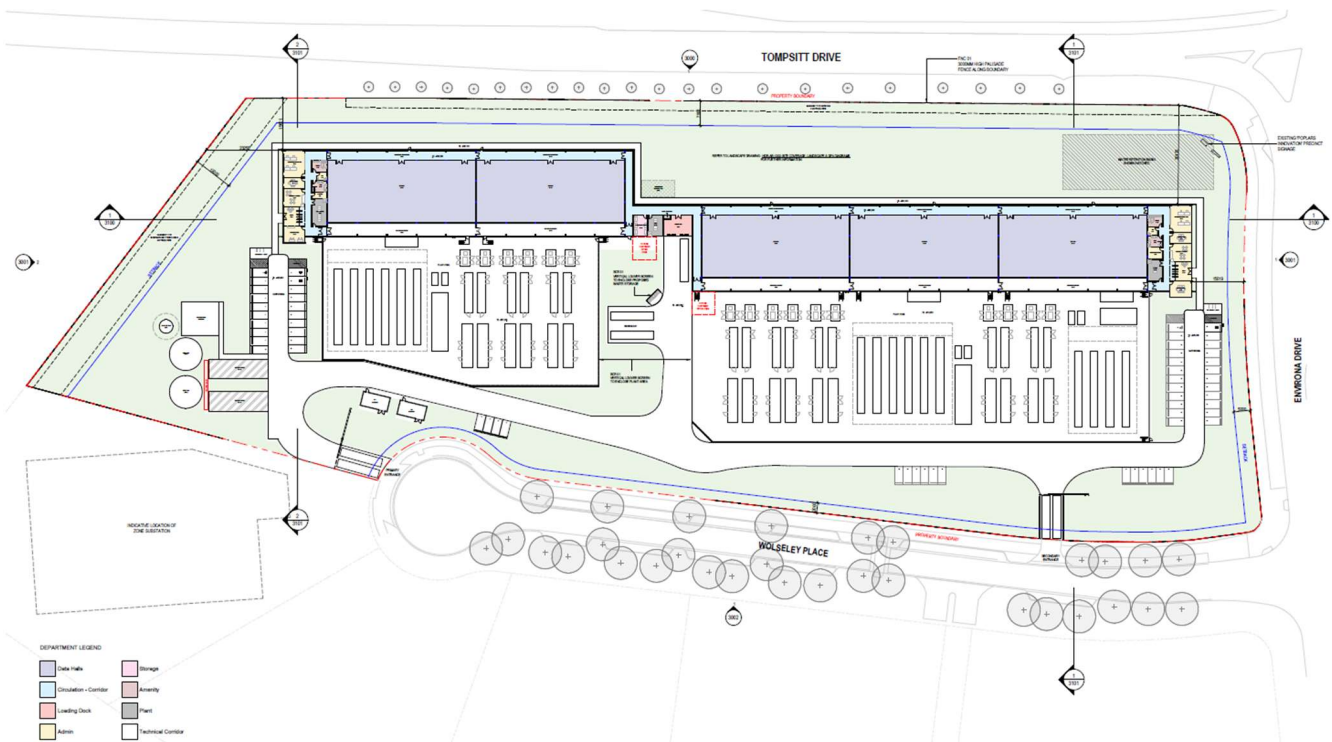


Figure 2: Site Plan (Source: HDR)



1.2 Report Structure

The structure of this Submissions Report is presented in **Table 1**.

Table 1: *Submissions Report Structure*

Section	Heading	Description
Section 1.0	Introduction	Brief summary of the project to provide context for the submissions
Section 2.0	Analysis of submissions	Analysis of the issues and themes raised in submissions
Section 3.0	Actions taken since exhibition	Summarises the actions taken since the exhibition, including a summary of project refinements
Section 4.0	Response to submissions	Detailed response to the issues raised in submissions
Section 5.0	Justification for the project	Updated justification and evaluation of the project
Appendix A	Submissions register	Provides a register of all submissions received during public exhibition
Appendix B	Updated mitigation measures	Updated mitigation measures table
Appendices C to H	Supporting Information	Evidence of additional consultation and revised technical reports

2 ANALYSIS OF SUBMISSIONS

2.1 Submissions

The Department received 9 submissions in response to the exhibition, comprising:

- 7 advices from government authorities, including:
 - Queanbeyan-Palerang Regional Council (Council);
 - Conservation Programs, Heritage and Regulation (CPHR);
 - the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group;
 - Fire and Rescue NSW (FRNSW);
 - Heritage NSW;
 - Rural Fire Service (RFS); and
 - Transport for NSW (TfNSW).
- 2 submissions from service providers, including:
 - Essential Energy; and
 - Canberra Airport.

No public submissions were received. In addition to the above submissions, the Department also requested additional information on some matters.

None of the submissions objected to the project, although Council stated that it does not support the water use of the project (see details below).

2.2 Issues Raised

2.2.1 Government Agencies

Council supports the overall intention to build a data centre at this location, but does not support the use of water as a cooling mechanism. Council requested further information on the water demands, sewage generation and trade waste. Once these issues are addressed, Council would like the opportunity to provide further comment and potentially offer conditions to address water, sewer and waste.



DCCEEW Water Group noted that all requirements had been adequately addressed and did not provide further comment.

FRNSW made recommendations regarding the preparation of a Fire Safety Study prior to commencement of construction, and the development of an Emergency Plan and an Emergency Services Information Pack prior to occupation/commissioning.

Heritage NSW acknowledged the recently disturbed nature of the site, previous cultural heritage assessments and the due diligence assessment in the EIS, but recommended additional consultation with Aboriginal stakeholders including generating and consulting with an updated list of Registered Aboriginal Parties (RAPs) in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (2010).

RFS did not raise any significant issues, but recommended that the bush fire construction standards to the Stage 1 Building be constructed in accordance with Section 3 and Section 6 (BAL 19) of *Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas*.

TfNSW did not raise any material issues, noting that the traffic generated by the development would not have an impact on the State-Road network.

2.2.2 Service Providers

Essential Energy confirmed it had no comments on the proposed development.

Canberra Airport requested that further advice is obtained to determine if the proposed development exceeds the plume limits specified in the Civil Aviation Safety Authority's (CASA's) relevant Advisory Circular. If these limits are predicted to exceed plume limits, then a Plume Risk Assessment will need to be prepared and submitted to CASA for review and assessment having regard to aviation operations, risks and safety.

2.2.3 Public Submissions

No public submissions were received in response to the EIS exhibition.

3 ACTIONS TAKEN SINCE EXHIBITION

Since the exhibition of the EIS, DCI and the project team have undertaken a number of actions to understand and address issues raised in submissions, including:

- further consultation with relevant agencies and service providers (refer to Section 3.1); and
- additional assessment and refinement of the project (refer to Section 3.2).

3.1 Ongoing Consultation

A summary of the consultation undertaken since exhibition of the EIS is provided in **Table 2**.

Table 2: Summary of Ongoing Consultation

Agency/Service Provider	Date of Consultation	Summary of Consultation
Canberra Airport and CASA	9 May 2025	Phone and email discussion around the project's plume emissions associated with the contingency power diesel generators. Canberra Airport to review the Air Quality Impact Assessment report and advise of any further assessment requirements



Agency/Service Provider	Date of Consultation	Summary of Consultation
	21 May 2025	Canberra Airport formally requested the project to confirm if the generator plume exhaust would comply with the CASA Advisory Circular AC 139.E-02v3.0 limits
	26 June 2025	Submission by email of Form 1247 to CASA seeking formal assessment of the plume emissions associated with the proposal
	7 July 2025	Correspondence from CASA advising that it has no objections to the project and that no additional mitigation measures are required (see Appendix H)
DPHI	14 May 2025	Provision of Council and Essential Energy's submissions by DPHI, both of which were received outside of the formal exhibition period
Heritage NSW and Aboriginal stakeholders	17 June 2025	Email to Heritage NSW seeking agreement to further engage with Registered Aboriginal Parties (RAPs)
	18 June 2025	Email correspondence from Heritage NSW recommending that the project completes Stage 1 of the consultation process in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW 2010)
	26 June 2025	Letters issued to 7 agencies and organisations (as listed in the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW 2010) guidelines) seeking the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places associated with the project
	2 July 2025	Placement of an advertisement in the Regional Independent newspaper (circulation 5,000) seeking interest from Aboriginal parties who hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area who wish to be included as a RAP for the project
	17 July 2025	Email correspondence to Heritage NSW advising that no Aboriginal parties registered an interest in the project and the required Stage 1 consultation process has been met. Confirmation of completion of Stage 1 was requested from Heritage NSW
	18 July 2025	Email correspondence to Heritage NSW confirmation Stage 1 consultation had been met to the agency's satisfaction (noting the original Agency contact was on annual leave)
	22 July 2025	Telephone message to Heritage NSW confirmation Stage 1 consultation had been met to the Agency's satisfaction (noting the original Agency contact was on annual leave)
Council	24 June 2025	Phone call to Council to arrange a meeting to discussion issues raised in Councils Submission
	2 July 2025	In person meeting with Council representatives to discuss water usage and sewer discharges concerns
	8 July 2025	Email correspondence outlining refinements to the project resulting in significant reductions in water consumption and sewerage discharges. Revised Infrastructure and ESD reports provided to Council requesting any additional feedback



Agency/Service Provider	Date of Consultation	Summary of Consultation
	22 July 2025	Email correspondence to Council requesting any additional feedback on reports issued 8 July 2025

3.2 Project Refinements

To address the water-related issues raised by Council, DCI has refined the cooling system for the data centre from an adiabatic cooling system to an adiabatic cooling system with ambient temperature programming. As outlined in **Table 3** below, the revised cooling system would reduce potable water use by some 90% compared to the originally proposed cooling system.

Table 3: Summary of Proposed Project Refinements

Component	EIS Project	Refined Project	Comment
Cooling System	Adiabatic cooling system	Adiabatic cooling system with ambient temperature programming	After additional consultation with Council, further modelling and design refinements to the proposed cooling system was undertaken. To minimise the make-up water required, the chiller/s would be programmed with set parameters that only activate the adiabatic system within the chiller once high ambient temperatures are reached. The adiabatic assist system on the chiller intake uses potable water to reduce the ambient air temperature entering the chillers, therefore improving their coefficient of performance. In the previously proposed mechanical system configuration, the system operated continuously, regardless of ambient temperature, resulting in approximately 8,760 hours of annual operation. The mechanical system has now been refined to activate only when the ambient temperature exceeds 30°C (220hours of usage on average), reducing water consumption significantly. Modelling of chiller controls indicates an annual reduction in potable water consumption of approximately 59,880 kL (or approx. 90%) compared to the cooling system described in the EIS. Based on the site location this setting provides an appropriate balance between both energy and water saving initiatives.

3.3 Additional Assessment

To assess issues raised in submissions and support the proposed project refinements, DCI has revised some of the technical reports undertaken for the EIS. These assessments include the:

- Infrastructure Servicing Strategy (see **Appendix C**);
- Ecologically Sustainable Development (ESD) Report (see **Appendix D**);
- Traffic Assessment (see **Appendix E**); and
- Dangerous Goods Report (see **Appendix F**).



The project refinements, and the issues raised in submissions, have not required any change to the key project elements as outlined in the EIS – including architectural, landscape and civil design plans for the project.

4 RESPONSE TO SUBMISSIONS

A response to the issues raised in submissions, as well as the Department's additional information request, is provided in the following sections. For ease of reference, the following sections include numbering as outlined in the submissions where relevant.

The responses include details on actions taken since exhibition of the EIS, including additional engagement with stakeholders, additional specialist reports and advice prepared to support the responses, and details on refinements to the project to address the issues raised in submissions.

4.1 Government Agencies

4.1.1 Queanbeyan-Palerang Regional Council

Aspect	Issue/Recommendation	Response
Water and Sewer Servicing		
<i>Water Main</i>	An existing 150mm water main runs within the road reserve on Wolseley Place. The proposed lot is served with an existing 50mm services tie from the mains at Wolseley Place. While this is likely to be adequate to service the development, the actual size required is to be confirmed by a specialist hydraulic consultant	The Infrastructure Servicing Strategy in the EIS (and as updated for this Submissions Report – see Appendix C), prepared by the project hydraulic consultant (HDR), notes that the 50 mm water connection is not adequate to service the proposed development, and would be replaced by a new 150mm connection. Final sizing would be confirmed during detailed design.
<i>Sewer Main</i>	The lot is serviced with an existing 150mm AC sewer main that runs along the front verge of Wolseley Place. The existing sewer tie-off of the manhole on the adjacent driveway will be retained to service the proposed development. No sewer easements are affected by this development	Noted.
<i>Section 64 Water and Sewer</i>	The proposed development is applicable for developer contributions under Section 64 of the EP&A Act, depending upon the Equivalent Tenement (ET) credits for the lot. For standard light industry, Council estimates the site would generate 60.795 ETs. However, the proposed water usage of 66,000 kL per annum equates to approximately 300 ETs. Council has serious concerns with the current proposal requiring excessive water consumption	Council's comment in relation to Section 64 contributions is noted. As outlined in Section 3.2 above, DCI has undertaken further modelling and design refinements to the proposed cooling system for the data centre in response to Council's concerns about water usage. The cooling system is by far the main water usage at the facility. The revised design incorporates adiabatic air-cooled chillers with free cooling for heat rejection, with the chillers programmed with set parameters that only activate the adiabatic system within the chiller once high ambient temperatures are reached. Based on the site location this setting provides an appropriate balance between both energy and water saving initiatives.



Aspect	Issue/Recommendation	Response
		The revised cooling system and predicted water usage is outlined in the updated Infrastructure Servicing Strategy (see Appendix C) and updated ESD Report (see Appendix D). The modelling indicates that the total water demand from the data centre (including mechanical plant and domestic usage) would reduce from 65,800 kL/year for the original project, to 5,921 kL for the updated project, or a reduction of some 90% total water usage. The revised cooling system would increase energy usage somewhat, however the predicted Power Usage Efficiency (PUE) for the data centre would increase only marginally from 1.27 to 1.3, and would still meet the Climate Neutral Data Centre Pact (CNDP) PUE target of 1.3-1.4 for new data centres, as outlined in the revised ESD Report (see Appendix D).
	Concerns around water demands for the adiabatic cooling systems are understated given the goal of thermal stability during adverse climatic conditions	The selection of the mechanical plant including make-up water tanks have been based on the 20-year return period of extreme weather conditions.
<i>Fire Tanks</i>	Council notes the two proposed 275kL fire tanks, but raised concerns regarding mention that the tanks could be downsized by connecting this system to Council's water mains	The proposed arrangement does not rely on town main connection for fire fighting purposes. Full capacity fire tanks would be provided, and DCI is not proposing to reduce the tank sizes. A manual quick fill facility would be supplied to the town main, however this would only be used to fill tanks if and when the tanks are used (after a fire event). The Infrastructure Servicing Strategy has been updated to reflect this (see Appendix C).
	Council raised concern about a statement in the ESD Report that "water tanks will be designed to sustain water supply to the mechanical plant in the building, ensuring operational stability during utility water outages", implying that the fire tanks will not be fire tanks, and merely acting as balance tanks	The ESD Report has been updated to clarify that this statement refers to the make-up water tank for chillers, rather than the fire water tanks (see Appendix D). The fire tanks are separate and for fire use only (ie. during a fire event). The make-up water tank is designed to sustain make-up water supply to the mechanical chillers ensuring operational stability during utility water outages.
<i>Sewage Volumes</i>	No information is provided on the expected volume of sewage discharged from the site, nor is any discussion or information provided on trade waste impacts on the sewerage network	The Infrastructure Servicing Strategy has been updated to provide additional information on expected sewage volumes from the data centre (see Appendix C). As outlined, the data centre would not generate any trade waste, and domestic sewer generation would be relatively low at approximately 320 kL/year.



Aspect	Issue/Recommendation	Response
<i>Reclaimed Water</i>	Council noted the statement in the EIS regarding DCI exploring opportunities to use reclaimed water from the Queanbeyan sewerage network (subject to separate approval), but has some concerns about the feasibility and likelihood of this potential water source	Noted. This potential recycled water use opportunity outlined in the EIS does not form part of the proposed development.
Stormwater		
<i>Stormwater</i>	No stormwater management plan (SMP) or detailed on-site detention (OSD) system drawings were submitted with the DA. Prior to the issue of construction certificate, a detailed plan demonstrating the effective management of stormwater complying with Council specification D5 and D7 will be required.	A detailed SMP (report and drawings) including OSD arrangements and water sensitive urban design (WSUD) is included in Appendix E of the EIS. The EIS includes a commitment to undertake the development in accordance with the SMP. DCI has amended the commitment to prepare a final SMP, in consultation with Council and in accordance with Council's specifications, prior to the commencement of construction.
<i>Flooding</i>	No issues raised	Noted.
Soil and Water Management		
<i>Erosion and Sediment Control</i>	An Erosion and Sediment Control Plan (ESCP) / Soil and Water Management Plan (SWMP) will be required for any works causing surface cover disturbance	An ESCP/SWMP is included in the civil design plans and the SMP (see Appendix E of the EIS).
Traffic and Parking		
<i>Parking</i>	Council noted the shortfall of parking compared to its DCP requirements, but acknowledged the demand-based parking assessment undertaken in the EIS, and did not raise any further requirements, or any other traffic-related issues	Noted.
<i>Entrance and Access</i>	Council noted that the driveway crossover width is adequate, and acknowledged the swept paths provided with the EIS	Noted.
<i>Section 7.11 Roads</i>	Council noted that the South Jerrabomberra Local Infrastructure Contributions Plan applies to the site, but that the S.7.11 contribution was collected as part of the estate development, and that no further contribution is required	Noted.
Engineering Conditions		
<i>Conditions</i>	Council recommended a number of engineering and related conditions for the proposed development	Noted. DCI does not object to these conditions.



4.1.2 Department of Planning, Housing and Infrastructure

Aspect	Issue/Recommendation	Response
Back-up Generator Testing		
1. Generator Testing Regime	Provide further information on the proposed testing regime, including: a) proposed load for each test b) Confirmation ramp up/cool down times have been factored into proposed test durations c) Confirmation whether commissioning tests would be undertaken for each back-up generator	Generators would be operated at normal building loads during scheduled back-up power testing exercises. Yes. Ramp up and cool down times take approximately 30 seconds to one minute for each generator. Yes. During commissioning, each generator would be tested (on a one off basis) to ensure compliance and performance.
Staffing Numbers		
2. Staffing	Section 3.7 of the EIS notes the development would employ up to 24 full time equivalent (FTE) staff during operation, while section 4.2.1 of the Traffic Impact Assessment refers to a total of 12 staff and up to 6 visitors being on-site at any one time. Please review and clarify this discrepancy as appropriate	The development would employ up to 24 full time equivalent staff during operation. The Traffic Assessment has been amended to reflect this number (see Appendix E).
Parking		
3. Parking Spaces	The number of proposed parking spaces seems excessive, particularly given the proposed land use and associated staffing arrangements (ie. 60 parking spaces compared to a maximum of 24 FTE staff). Consideration should be made to reducing the number of proposed parking spaces (with particular focus on those spaces located between the internal access road and the site's southern boundary), and subsequent opportunities to increase the number of trees and/or the area of land devoted to shrubs and groundcover, as appropriate.	DCI has attempted to strike a balance between Council's DCP requirements for a total of 78 car parking spaces (including 2 accessible parking spaces) and parking needs based on FTE staff and visitor numbers. DCI believes a total of 60 car parking spaces (including 2 accessible parking spaces) is reasonable and appropriate, noting that Council noted the shortfall between the parking supply and its DCP requirements. As outlined in the EIS, the proposed development has a low floor space ratio (ie. 0.14:1) and site cover (0.21:1), which is well below the maximum allowable FSR of 1:1. It also has a high landscape area comprising some 40% of the site area, which is well above the 10% minimum in the DCP. As such, the landscaped area on the site is considered reasonable and appropriate.
Hazard and Risk		
4. Power Train Units (PTUs)	In section 6.8.2 of the EIS, the PTUs are described as being in the building. However, the Dangerous Goods (DG) report has described the PTUs as being outdoors, with supporting locational drawings (Figure 3-4 of the DG report).	The PTUs are to be located outdoors (not in a building). This conforms with the information provided in the DG report.
5. Diesel Storage	Figure 4-1 of the DG report presents the table of controls associated with diesel storage, including reference to the use of firewalls. Please confirm that the information	The diesel generator containers consist of belly tanks that are designed to act as double walled tanks. The hazard and risk consultant has confirmed the separation distances required and



Aspect	Issue/Recommendation	Response
	contained in the table is consistent with the diesel storage proposed in Figure 3-4 showing outdoor storage.	Figure 4-1 of the DG report has been updated (see Appendix F). References to fire walls have been removed.
6. PTU Separation Distances	The separation of PTUs from each other and from diesel storage is critical to minimising the risk of fire propagation, thereby containing potential incidents to a single component. While the separation distances are outlined in Table 4-4 of the DG report and the corresponding layout is shown in Figure 3-4, there appears to be an inconsistency between the stated distances and the site layout.	The risk consultant has confirmed that the separation distances between PTUs is 1.5m. Table 4-4 has been updated to reflect this change. The site layout is now consistent with the stated distances (see Appendix F).
Air Quality		
7. Sensitive Receiver Locations	Please provide further information regarding how the locations of sensitive receptors were chosen and clarify why potential impacts to certain key receptors (e.g. the Jerrabomberra Hotel, Jerrabomberra Village, Jerrabomberra Public School, the future childcare centre at 14 Ferdinand Lane, etc) were not considered within the Air Quality Impact Assessment (AQIA).	The project air quality consultant, SLR, has provided clarification on the air quality issues raised by the Department. SLR's response is summarised below. Sensitive receptors were selected through consideration of land use, lot boundaries, distance, and direction from source. The assessment aimed to identify at a minimum, the closest receptors in each cardinal and ordinal direction (approximately). While a specific receptor of interest may not be identified as a discrete receptor in Section 5.1 of the AQIA, if it is within the modelling domain it is captured by the gridded model and can be seen on Isopleths Provided in Appendix A of the AQIA. Figure 3 below shows the identified 'key receptors' in context with the discrete receptors assessed. Of note: • R1 and R25 are in a similar direction from the emissions source as 14 Ferdinand Lane but are closer to the sources; • R2 and R25 are in a similar direction from the emissions source as Jerrabomberra Village and Jerrabomberra Hotel but are closer to the sources; and • R25 and R45 are in a similar direction from Jerrabomberra Public School but are closer to the sources. R5 is also closer to the emission sources but approximately 300m north of the public school. Of these receptors, only R45 had predicted additional exceedances of the 24-hour PM_{2.5} criterion. As noted in the AQIA, an emergency condition event lasting 24 hours



Aspect	Issue/Recommendation	Response
		resulting in a predicted exceedance of the criterion is highly unlikely at this receptor.
8. Back-up Generator Modelling	Section 6.2.7 of the AQIA notes the most eastern back-up generator was modelled for the operational maintenance scenario. Please provide detailed justification as to why this location can be considered to reflect a realistic 'worst case' assessment of day-to-day operations at all nearby sensitive receptors, and noting the proximity of other industrial receptors to the immediate south.	The eastern-most generator is the closest to residential areas and other sensitive uses to the east of the site. It is noted that there are several receptors to the south that are equi-distant to an emission source. While consideration of a different emission stack may increase the impacts at the receptors closest to it, it would underestimate impacts at the residential and other sensitive receptors.
9. Nitrogen Dioxide Concentrations	Provide the maximum predicted cumulative (1-hour and annual) nitrogen dioxide (NO ₂) concentrations for the nearest industrial receptors to the site (i.e. R26 and R43 to R45).	The predicted maximum cumulative 1-hour and annual NO ₂ concentrations during standard and emergency operations scenarios are provided in Tables 4 and 5 below. As indicated, cumulative emissions are predicted to comply with the applicable criteria.
10. Figure D3	The contours provided in Figure D3 of the AQIA appear to jump from 200 micrograms per cubic metre (µg/m ³) to 50 µg/m ³ . Please review this figure and consider whether further contours should be added to more accurately reflect the dispersion of oxides of nitrogen (NO _x) within the locality.	Figure D3 of the AQIA provides NO _x and is not directly comparable to a criterion. However, the figure has been updated and is presented in Figure 4 below.
Noise and Vibration		
11. Sound Power Levels (SPL)	Provide further information to confirm that the adopted SPLs identified in section 4.1.1.2 of the Noise and Vibration Assessment (NVA) account for realistic heatwave conditions, including higher temperatures and/or humidity levels during the evening and night. Local weather data (including consideration of humidity during heatwave conditions) must be referenced to support the corresponding wet bulb temperature of 23.8°C as described in Appendix B of the NVA.	The selection and sound power level of the equipment have been based on the 20-year return period of extreme weather conditions, as specified by the Canberra Airport weather station from the ASHRAE weather station data. It is important to note that "100% load" sound levels have been used to predict noise levels for all time periods, including the evening and night periods. It is unlikely that the chillers would operate at 100% at those more sensitive times as ambient temperatures would certainly be lower. Where temperatures are lower, then the plant would respond by adjusting the load accordingly and corresponding sound emission would also reduce.
12. Construction Hours	The Department notes that the standard hours of construction for Saturdays recommended by Queanbeyan-Palerang Regional Council in its submission differ from those recommended in the <i>Interim Construction Noise Guideline</i> (ICNG).	The development proposes to align with the recommended construction hours contained in the Department's <i>Interim Construction Noise Guidelines</i> .
13. Construction Scenario Timelines	Please clarify the approximate timeframe for each of the construction scenarios identified in Table 20 of the [Noise and Vibration Assessment] NVA.	The construction staging and duration is outlined in Sections 3.4 and 3.7 of the EIS, and includes: Stage 1 (12-18 months duration);



Aspect	Issue/Recommendation	Response
		• Stage 2 (6 month gap then approx. 6 months duration); • Stage 3 (6 month gap then approx. 6 months duration). In relation to the construction works activities in Table 20 of the NVA: • earthworks (W.01) and hard rock excavation (W.02) would be largely limited to Stage 1, and would have an approx. 1-2 months duration; • internal roads, pads and hardstands (W.03) would have an approx. 2 month duration; and • structures and equipment installation (W.04) would have an approx. 6-12 month duration, depending on the stage.
Engagement		
14. Further Council Engagement	The submissions report must provide details and outcomes of your ongoing engagement with Council, particularly in relation to the development's proposed water consumption and wastewater servicing arrangements.	The following additional consultation with Council around water consumption and discharges to sewer have since been undertaken: • 24 June 2025 – Phone call to Council to arrange an in-person meeting with relevant Council staff; • 2 July 2025 - Meeting held with Council representatives to discuss water usage and sewer discharges concerns; • 8 July 2025 - Email correspondence outlining refinements to the project resulting in significant reductions in water consumption and sewerage discharges. Revised Infrastructure and ESD reports provided to Council requesting any additional feedback; and • 22 July 2025 – Follow up email requesting any comments or concerns regarding the revised reports.

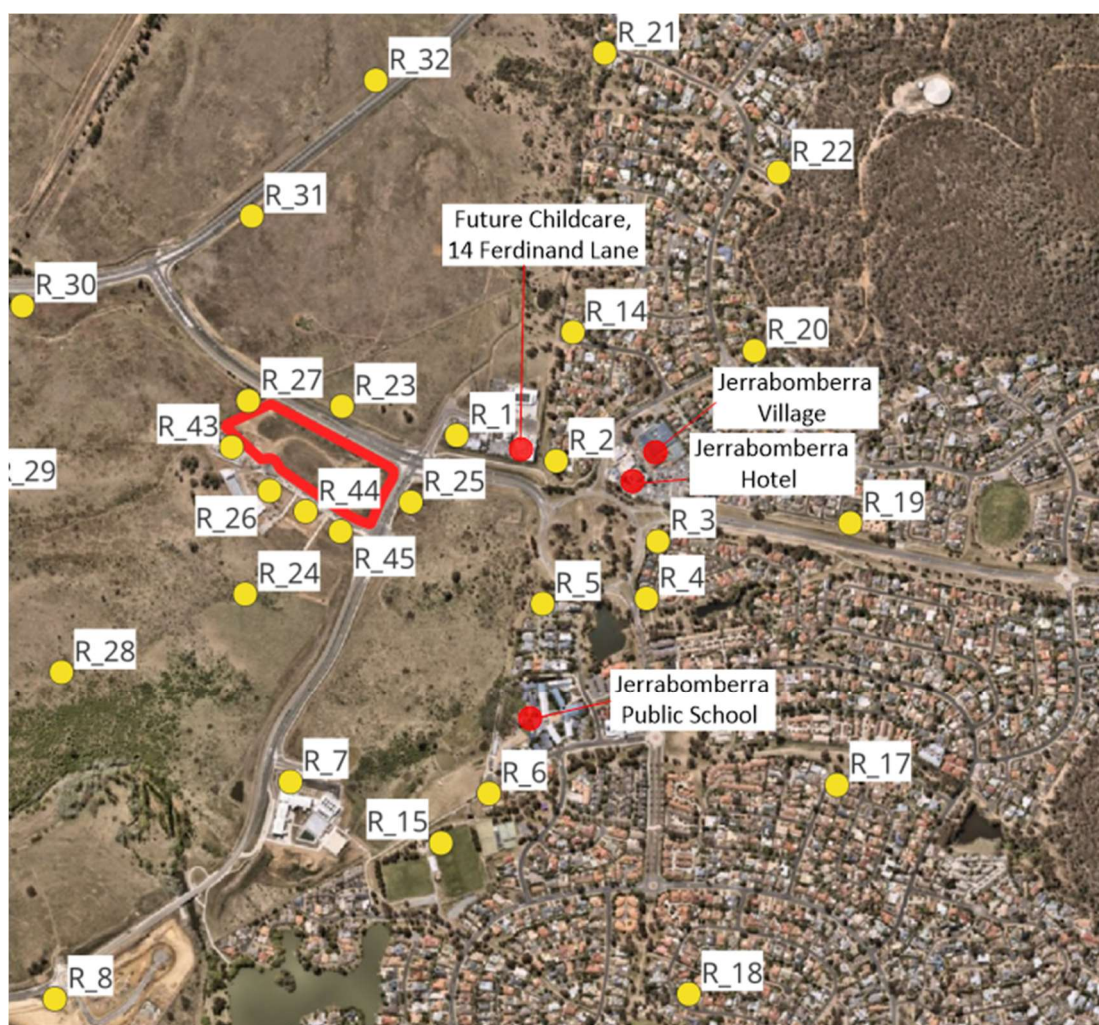


Figure 3: Surrounding Sensitive Receptors (Source: SLR)

Table 4: Predicted NO₂ Concentrations at Selected Sensitive Receptors – Standard Operations

Receptor ID	Incremental (µg/m³)							Cumulative (µg/m³)
	Maximum 1-Hour	Corresponding 1-Hour ^a					Annual	1-Hour
		NO _x (µg/m³)	O ₃ (ppb)	Wind Speed (m/s)	Transport Time (s) ^b	NO ₂ (µg/m³)		
R 26	2	375	12	3	31	2	0	58
R 43	2	168	13	6	30	0	0	58
R 44	3	672	10	5	13	2	0	58
R 45	5	530	28	3.7	34	0.0	0.1	58
Criterion								164
a Used to calculate 1-hour incremental NO ₂ concentration using the Method 3 (Section 6.2.8).								
b Approximate plume transport time from source to receptor based on windspeed and separation distance.								



Table 5: Predicted NO₂ Concentrations at Selected Sensitive Receptors – Emergency Scenario

Receptor ID	Incremental (µg/m³)							Cumulative (µg/m³)
	Maximum 1-Hour	Corresponding 1-Hour ^a					Annual	1-Hour
		NO _x (µg/m³)	O ₃ (ppb)	Wind Speed (m/s)	Transport Time (s) ^b	NO ₂ (µg/m³)		
R 26	28	4386	22	1	101	2	2	58
R 43	63	5015	15	5	36	0	3	71
R 44	27	5680	22	1	75	2	1	58
R 45	37	4402	22	1	134	2	2	58
Criterion								164
a Used to calculate 1-hour incremental NO ₂ concentration using the Method 3 (Section 6.2.8).								
b Approximate plume transport time from source to receptor based on windspeed and separation distance.								

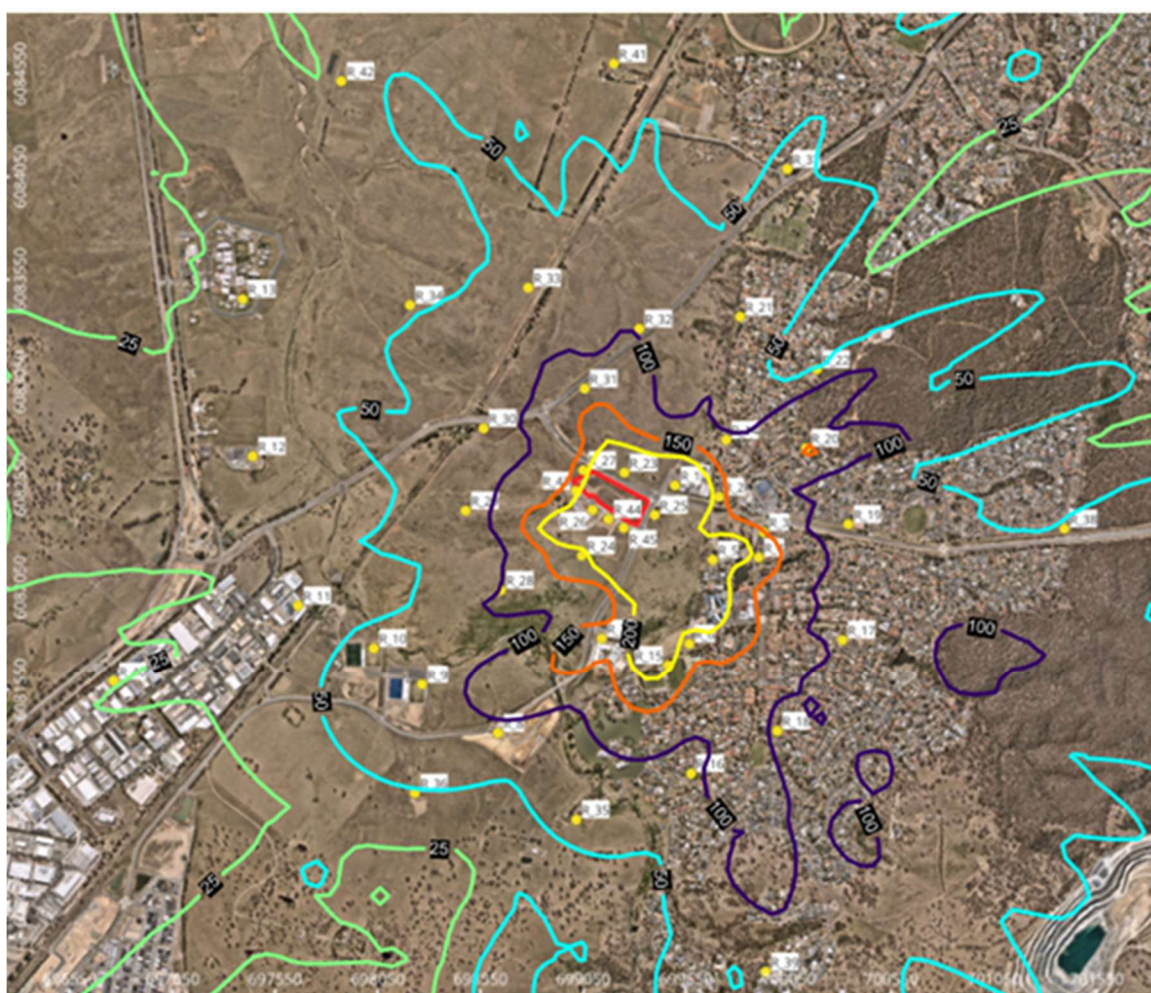


Figure 4: Maximum Predicted 1-hour Average Incremental NO_x Concentration – Operations (Source: SLR)



4.1.3 Conservation Programs, Heritage and Regulation

Aspect	Issue/Recommendation	Response
Biodiversity		
BDAR Waiver	Notes that a Biodiversity Development Assessment Report (BDAR) waiver was provided on 31 January 2024	Noted.
Construction		
Construction Environment Management Plan (CEMP)	Recommends preparation of a CEMP as outlined in the EIS	Noted. DCI would prepare a detailed CEMP for the development, prior to the commencement of construction.

4.1.4 DCCEE Water Group

Aspect	Issue/Recommendation	Response
Water		
EIS	Satisfied all requirements have been addressed	Noted.

4.1.5 Fire and Rescue NSW

Aspect	Issue/Recommendation	Response
Safety		
Fire Safety Study	Recommends that prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.22 and submitted to FRNSW for review	Noted. A FSS would be developed in accordance with Fire and Rescue NSW's requirements and submitted for review. The mitigation measures have been updated to reflect this commitment (see Appendix B).
Emergency		
Emergency Plan	Recommends that prior to occupation/commissioning an Emergency Plan is developed for the site in accordance with HIPAP No.1	Noted. An Emergency Plan would be prepared for the site prior to occupation. The mitigation measures have been updated to reflect this commitment (see Appendix B).
Emergency Services information Pack	Recommends that prior to occupation/commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans	Noted. An ESIP would be prepared for the site prior to occupation. The mitigation measures have been updated to reflect this commitment (see Appendix B).

4.1.6 Heritage NSW

Aspect	Issue/Recommendation	Response
Consultation		
Registered Aboriginal	Acknowledged the recently disturbed nature of the site and cultural heritage assessments, but	As requested by Heritage NSW, additional Stage 1 consultation in accordance with the



Aspect	Issue/Recommendation	Response
<i>Parties (RAPs)</i>	recommends additional consultation with Aboriginal stakeholders including generating a list of RAPs. To ensure currency, this list must include Stage 1 of the consultation process under the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW 2010) guidelines to identify any additional parties who may hold an interest in the subject land/project.	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW 2010) guidelines has been undertaken. This included placement of an advertisement in a local newspaper (Queanbeyan-Palerang Regional Independent, circulation 5,000), and correspondence to a number of agencies and organisations, including • Department of Climate Change, Energy, the Environment and Water; • Ngambri Local Aboriginal Land Council • Aboriginal Land Rights Act 1983 (NSW), Office of the Registrar; • National Native Title Tribunal; • Native Title Service Corporation; • Queenbeyan-Palerang Regional Council; and • Murrumbidgee Catchment Management Authority. Evidence of this consultation has been forwarded to Heritage NSW, and is attached in Appendix G. As a result of these notifications, only one response was received from the National Native Title Tribunal, which advised that it did not have any names of Aboriginal people who may hold cultural knowledge relevant to the site. As such, no RAPs registered an interest in the project in response to the additional consultation.
<i>Project Update Letter</i>	Heritage NSW also requested that a project update letter be sent to project RAPs who have registered an interest in the land covered by the project. A copy of the project letter, attachments and evidence of additional consultation are to be provided to Heritage NSW for review	The Stage 1 consultation resulted in no Aboriginal parties requesting to be included as a RAP for the project.

4.1.7 Rural Fire Service

Aspect	Issue/Recommendation	Response
Construction Standards		
<i>Bushfire</i>	Recommend that the bush fire construction standards to the Stage 1 Building be constructed in accordance with Section 3 and Section 6 (BAL 19) of <i>Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas</i>	Noted. The Stage 1 building would be constructed to section 3 and section 6 (BAL 19) <i>Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas</i> . The mitigation measures have been updated to reflect these requirements (see Appendix B).



4.1.8 Transport for NSW

Aspect	Issue/Recommendation	Response
Traffic		
Transport	Notes that the traffic generated by the development would not have an impact on the State road network	Noted.

4.2 Service Providers

4.2.1 Essential Energy

Aspect	Issue/Recommendation	Response
Energy		
Electricity Supply	Essential Energy has no comments to make as to potential safety risks arising from the proposed development	Noted.

4.2.2 Canberra Airport

Aspect	Issue/Recommendation	Response
Plume Limits		
Generator Exhausts	Recommended that DCI confirms that the project would not exceed the plume limits specified in the CASA Advisory Circular AC 139.E-02v3.0 – Plume Rise Assessment. If the proposed facility does exceed the plume rise assessment requirements from the CASA Advisory Circular, then the proposed development and a Plume Rise Assessment will need to be referred to CASA for assessment	A Plume Rise Assessment has been prepared by HDR/SLR,, and was referred to CASA on 26 June 2025. On 7 July 2025, CASA confirmed that the project would not infringe the Obstacle Limitation Surface (OLS), and would achieve an acceptable level of safety regarding plumes. As such, CASA advised that it has no objections to the project and no mitigations are required (see Appendix H).

5 JUSTIFICATION AND CONCLUSION

This Submissions Report has been prepared to address issues raised by government and service providers during the public exhibition of the EIS for the proposed DCI Poplars Data Centre. No submissions were received from the general public in response to the exhibition period.

A small number of refinements have been made to the project to address issues raised in submissions, principally an update to the cooling system to significantly reduce water usage, along with some other minor refinements to mitigation measures. The project refinements are outlined in **Table 3** above, and updated mitigation measures are provided in **Appendix B**.

The issues raised in submissions have not required any significant change to the design or layout of the proposed data centre, and do not affect or alter the project need and justification, as outlined in Section 7.3 of the EIS.

In this regard, the proposed DCI Poplars Data Centre Project would provide a high quality and high technology data storage facility in a manner that would complement the character of the Poplars Innovation Precinct and the Queanbeyan-Palerang LGA.



The development represents a significant capital investment by DCI in the Poplars Innovation Precinct and the wider South Jerrabomberra area, which is identified in the *Draft South East and Tablelands Regional Plan 2041* as a regionally significant employment area.

Importantly, the proposal would facilitate the development of a high technology industry in the Queanbeyan-Palerang LGA, with the generation of advanced technology jobs and flow-on economic opportunities in the information technology sector. The project would also assist in meeting society's growing demand for data storage.

The site is well suited to the development, as it is zoned for employment uses, has or will have access to all required infrastructure and services, and is removed from residential zoned land and potential environmental hazard.

Environmental assessment indicates that the development is unlikely to result in any significant environmental impacts or adversely affect the amenity of the surrounding area. On balance, it is considered that the development represents the orderly and reasonable development of the land, and is therefore in the public interest.

Having regard to all the relevant environmental, social and economic issues, it is considered that the proposed development represents orderly development of the land. It is respectfully requested that the Minister for Planning and Public Spaces (or delegate), having due regard for the information submitted in this document, grants approval to the proposed DCI Poplars Data Centre Project at Jerrabomberra.