

14 August 2025
 Census Advisory
 Level 2
 40 King Street
 Sydney

Dear Torben,

1. Introduction

This letter has been prepared by **ptc.** to address comments received from the Department of Planning, Housing and Infrastructure (DPHI), the community, and Milestone regarding the Transport Impact Assessment (TIA), Construction Traffic Management Plan (CTMP), and Green Travel Plan (GTP) submitted as part of the State Significant Development Application (SSDA) for the DigiCo SYD1 Data Centre Expansion.

The comments primarily relate to construction traffic impacts, use of Pyrmont Street for access, pedestrian and cyclist safety, worker parking, and broader amenity concerns. This letter responds to each issue raised in a structured manner, referencing the relevant supporting documentation prepared by **ptc.** and providing clarification or proposed refinements where appropriate.

2. Response to Department of Planning, Housing and Infrastructure (DPHI) Comments

This section provides a point-by-point response to the comments issued by the DPHI regarding the submitted traffic reports prepared by **ptc.** for the DigiCo SYD1 Data Centre Expansion. Each comment has been carefully reviewed and addressed below.

Table 1 - DPHI Comments

DPHI Comments	ptc. response
Construction Impacts	
<p><i>16. The Department notes from the Construction Traffic Management Plan in Appendix 17 that construction will occur for a period of 21 months. The Department requests further information including a breakdown of the construction timeline for each stage of the development, including a further breakdown of key phases (e.g. civil works, piling, structural works, fit-out, building services and testing/commissioning), identification of peak/intensive construction periods and their associated duration. Additionally, please clarify</i></p>	<p>The construction plan is annexed to this letter. The peak construction period is estimated to be between late July 2027 and February 2028, during which four to five streams of work will be active concurrently. The most intense works are expected to include:</p> <ul style="list-style-type: none"> • New Plant, Equipment & Services Reticulation • Internal Building Works • New Roof Structure & Facade Works • Landscaping & Pavements

<p><i>whether any overlapping works would occur between stages.</i></p>	<ul style="list-style-type: none"> • Commissioning activities
<p><i>17. Further to the above, the proposed construction timeline may lead to cumulative impacts and construction fatigue for nearby residents and businesses. In this regard, the Submissions Report must include a framework for managing cumulative impacts and construction fatigue. The framework should include outcomes of consultation with the surrounding community, details of the likely construction duration and project-specific analysis of the high-level mitigation measures identified in the EIS.</i></p>	<p>The proposed development acknowledges the presence of concurrent major construction projects within the Pymont precinct, including the Sydney Metro West Pymont Station and the Harbourside redevelopment. While a Principal Contractor has not yet been appointed for the DigiCo SYD1 works, the Construction Traffic Management Plan (CTMP) includes a commitment to minimising disruption and coordinating with external stakeholders throughout the construction phase.</p> <p>Once appointed, the contractor will be required to implement the following framework to manage cumulative construction impacts:</p> <ol style="list-style-type: none"> 1. The Principal Contractor will engage with Sydney Metro, City of Sydney Council, and other nearby developers to understand concurrent construction timelines, site access needs, and delivery staging. Regular coordination meetings will be arranged to discuss overlapping activities and potential conflicts. 2. Haulage schedules and traffic staging plans will be reviewed in consultation with neighbouring projects. Delivery windows and access points will be adjusted as necessary to avoid peak periods or road capacity constraints. 3. Traffic controllers and site supervisors will maintain real-time communication with adjacent sites during peak activity periods to manage vehicle flows and reduce queuing or conflicts in shared road corridors such as Pymont Street. 4. Construction impacts will be monitored through regular site reviews and consultation with the City of Sydney. Adjustments to traffic management, delivery timing, or haulage routes will be made where necessary to respond to community or stakeholder feedback. 5. Record Keeping and Reporting: A register of consultation activities, meeting outcomes, and CTMP

	<p>adjustments will be maintained by the Principal Contractor. This will be made available to authorities upon request.</p> <p>This framework will be formalised in the detailed CTMP to be submitted prior to commencement of works, once the Principal Contractor has been engaged. Early consultation with key stakeholders, including Sydney Metro, will also be initiated at that time.</p>
<p><i>18. The Department notes that Pymont Street is proposed to be used for inbound heavy vehicles and serves as the location of the construction work zone during the construction phase. The Department seeks further clarification and justification for the use of Pymont Street over Harris Street during construction activities, including heavy vehicle movements, traffic capacity, pedestrian safety and local access impacts.</i></p>	<p>Pymont Street has been selected as the primary construction access route due to its suitability for construction vehicle activity and its reduced impact on the surrounding road network, particularly compared to Harris Street. The following points outline the rationale:</p> <ol style="list-style-type: none"> 1. Pymont Street carries significantly lower traffic volumes than Harris Street and is not part of the broader arterial network. By comparison, Harris Street is a State-classified road that operates at high volumes during both AM and PM peak periods and is critical for local and regional traffic flow. 2. Harris Street accommodates several high-frequency bus services (including Routes 501, 389, and 412) and contains multiple bus stops adjacent to the site. Construction activity along Harris Street would risk delays to public transport, reduce kerbside availability for buses, and create further congestion during peak periods. 3. The access strategy is consistent with comments received from TfNSW as a part of the SSDA referral, which explicitly recommends: <p><i>“There is to be no construction access gained directly from Harris Street. All construction access is to be via the local road network (e.g. Pymont Street, Quarry Street).”</i></p> 4. Although Pymont Street is not approved for B-double access, swept path analysis confirms that articulated vehicles (AVs) up to 19 metres in length can safely enter and exit the work zone without reversing or encroaching on traffic lanes or footpaths. These vehicles

	<p>can be fully accommodated on-site, avoiding queuing within the street.</p> <p>5. Haulage Management and Mitigation Measures:</p> <ul style="list-style-type: none"> ○ The majority of construction traffic will comprise smaller rigid and light vehicles. ○ Large vehicle movements (e.g. AV deliveries) will be limited and scheduled outside peak hours, typically in early mornings. ○ All haulage will be actively managed by traffic controllers, and vehicle movements will be coordinated with nearby projects, including Sydney Metro and Harbourside redevelopment works.
<p><i>19. The Department understands that approximately 33 light vehicles per day are expected during construction, however no information has been provided regarding construction workers parking arrangements. The Department requests further details on how construction-related parking will be managed, particularly with respect to minimising impacts on the availability of on-street parking and the surrounding local road network. This should include information on any off-site parking provisions, shuttle arrangements, or staggered worker arrival times, as well as strategies to discourage unauthorised parking in residential or high-demand areas.</i></p>	<p>The CTMP estimates approximately 33 light vehicle trips per day during peak construction activity. This figure includes a combination of construction workers, site managers, subcontractors, and visitors, as well as light vehicle deliveries to the site.</p> <p>To manage this volume and minimise impacts on the local road network, the following measures will be implemented:</p> <ol style="list-style-type: none"> 1. Pyrmont Street and surrounding streets are subject to time-limited on-street parking (typically 2-hour limits) and active ticketed enforcement by the City of Sydney, making them unsuitable for long-stay parking by construction staff. Also, the site is also located within a 5-minute walk of the light rail, which provides direct connections to trains and metro services at Central Station, as well as bus services at Railway Square. This high level of public transport accessibility supports the strategy to discourage construction workers from driving to site and encourages the use of alternative travel modes. 2. Several secure off-street parking stations are located within walking distance of

	<p>the site and can be used by construction staff and site visitors, including:</p> <ul style="list-style-type: none"> ○ Secure Parking – Harris Street, Pyrmont ○ Wilson Parking – Harbourside, Darling Harbour ○ ICC Sydney Parking P1 ○ ICC Sydney Parking P2 <p>The proponent is expected to subsidise or fully cover parking costs for key construction staff during peak phases to discourage on-street parking and reduce impacts to local residents and businesses.</p> <ol style="list-style-type: none"> 3. The designated work zone on Pyrmont Street will allow for short-term vehicle access for deliveries or equipment drop-off. Delivery drivers or couriers using the work zone for unloading will be instructed to use nearby public car parks if they need to remain on site for any duration beyond unloading. 4. All workers and subcontractors will be briefed on travel and parking expectations during induction. Parking behaviour will be monitored throughout construction, and compliance will be managed by the Principal Contractor. <p>This access and parking approach ensures that local amenity is protected and aligns with Council and Department expectations for responsible construction site management.</p>
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2.1. Response to Community Submissions

This section summarises and responds to key concerns raised in community submissions related to the DigiCo SYD1 Data Centre Expansion. The comments have been grouped by theme for clarity and are not reproduced in full. Common concerns include construction vehicle access via Pyrmont Street, cumulative traffic impacts, parking demand, pedestrian safety, and public amenity.

Where appropriate, responses have been aligned with those provided to DPHI to avoid duplication.

Table 2 - Community Submissions Comments

Community Submissions	ptc. response
<i>Use of Pyrmont Street for heavy vehicle access</i>	Pyrmont Street was selected to avoid congestion on Harris Street, a key arterial road with high traffic volumes and multiple bus

	<p>routes. While not a B-double approved route, swept path analysis confirms safe access for vehicles up to 19 metres. The majority of vehicles will be smaller rigid trucks. AV deliveries will be limited and scheduled outside of peak hours. (Refer to DPHI Comment 17 response.)</p>
<p><i>Cumulative construction impacts from nearby projects</i></p>	<p>A coordination framework has been established to manage cumulative impacts. The principal contractor will coordinate with Sydney Metro and other projects through meetings, shared scheduling, and traffic controller communication. (Refer to DPHI Comment 17 response.)</p>
<p><i>On-street parking pressure and construction worker vehicles</i></p>	<p>No on-site parking will be provided for workers. Pyrmont Street is subject to 2-hour timed parking restrictions with active enforcement, making it unsuitable for construction parking. Workers will be encouraged to use public transport or nearby commercial parking stations, including Secure Parking (Harris St), Wilson Parking (Harbourside), ICC P1 and P2. The proponent may subsidise parking to discourage on-street use. (Refer to DPHI Comment 19 response.)</p>
<p><i>Pedestrian and cyclist safety near the site</i></p>	<p>Traffic controllers will be stationed at access points to manage pedestrian activity. Vehicle deliveries will be timed to avoid peak periods, and the CTMP includes procedures to maintain safe shared use of Pyrmont Street during works.</p>
<p><i>Public amenity, noise and liveability impacts</i></p>	<p>The CTMP aligns with the approved construction hours as outlined in the EIS and Noise & Vibration Assessment. Peak activity will be managed through delivery scheduling and coordination with nearby projects to minimise disruption.</p>
<p><i>Green Travel Plan (GTP), Pedestrian Connectivity, and Public Realm Improvement</i></p>	<p>The purpose of the Green Travel Plan (GTP) is to outline site-specific initiatives that support sustainable transport choices by staff, such as walking, cycling, and public transport use. The GTP already includes:</p> <ul style="list-style-type: none"> • Mode share targets for non-car travel, • End-of-trip facilities (bike parking, showers, lockers),

	<ul style="list-style-type: none"> Monitoring and communications strategies to support long-term mode shift. <p>The request to fund or reinstate a pedestrian bridge over Darling Harbour or install large-scale public realm art installations falls outside the scope of the GTP and the current SSD application. These proposals relate to broader precinct-level planning and urban renewal strategies that would require leadership from Council, Transport for NSW, and the NSW Government.</p>
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2.2. Response to Milestone Comments

Milestone reviewed the Construction Traffic Management Plan (CTMP) prepared by ptc. (dated 4 March 2025) and raised two key concerns regarding construction access and proposed working hours. The following table outlines each comment and our formal response.

Table 3 - Milestone Comments

Milestone Comments	ptc. response
<p><i>Milestone has reviewed the Construction Traffic Management Plan prepared by PTC Consultants dated 4 March 2025 and while we are generally supportive of the proposed construction methodology, we have two key concerns that need to be addressed prior to the determination of the SSDA.</i></p> <p><i>The proposed works zone and heavy vehicle travel path along Pyrmont Street are reliant on confirming the height of the Western Distributor Overpass and the Pedestrian Bridge located at No. 235 Pyrmont Street. Milestone considers that is critical to confirm the height of these structures prior to the determination of the SSDA to ensure that the proposed works zone and heavy vehicle travel path are able to be utilised. If heavy vehicles cannot fit under the overpass and bridge, this will require an alternative location and route and the impacts of this potential change need to be fully considered at the assessment stage of the SSDA.</i></p>	<p>The clearance heights under the Western Distributor and the pedestrian bridge on Pyrmont Street have been reviewed with reference to TfNSW's NSW State Roads Vertical Clearances dataset (September 2023) and available architectural drawings from D/2023/387.</p> <ul style="list-style-type: none"> Bridge No. 8567 – Ramp from Harris Street over Pyrmont Street (Darling Harbour): Minimum clearance height of 5.87 m. Bridge No. 7779 – Twin Viaducts over Harris Street & Bulwara Road (Westbound, Ultimo): Minimum clearance height of 5.56 m. Bridge No. 7780 – Twin Viaducts over Harris Street & Bulwara Road (Eastbound, Ultimo): Minimum clearance height of 5.88 m. Pedestrian Bridge at 235 Pyrmont Street: Measured clearance of approximately 4.74 m from the footpath, based on architectural drawings (D/2023/387).

	<p>For reference, the overall body height of an AV is approximately 4.301 m, indicating that all listed structures, including the pedestrian bridge, appear to provide adequate clearance for the proposed vehicle movements. These measurements will be confirmed prior to commencement of works to ensure suitability for all proposed construction vehicle types.</p>
<p><i>In addition to this, the Construction Traffic Management Plan provides the following proposed construction hours:</i></p> <ul style="list-style-type: none"> • <i>Monday to Friday: 7am – 6pm;</i> • <i>Saturday: 8am – 4pm; and</i> • <i>Sundays and Public Holidays: No work.</i> <p><i>These documented hours extend beyond the hours quoted in the Noise and Vibration Assessment prepared by Pulse White Noise Acoustics Pty Ltd, dated 4 April 2025 and the Environmental Impact Statement prepared by Patch Planning dated 10 April 2025 which proposes the following construction hours:</i></p> <ul style="list-style-type: none"> • <i>Monday to Friday: 7am – 6pm;</i> • <i>Saturday: 8am – 1pm; and</i> • <i>Sundays and Public Holidays: No work.</i> <p><i>For transparency, we request that the Construction Traffic Management Plan be updated to detail the construction hours noted in the Environmental Impact Statement and the Noise and Vibration Assessment.</i></p>	<p>Construction hours will be aligned with those stated in the Noise and Vibration Assessment prepared by Pulse White Noise Acoustics Pty Ltd (dated 4 April 2025) and the Environmental Impact Statement by Patch Planning (dated 10 April 2025), namely:</p> <ul style="list-style-type: none"> • Monday to Friday: 7:00am – 6:00pm • Saturday: 8:00am – 1:00pm • Sunday and Public Holidays: No work <p>The CTMP will be updated to reflect this alignment for consistency across all documentation.</p>

Yours faithfully

Musstafa Abdullah

Traffic Engineer/ Transport Planner

Document Control: Prepared by MA on 14 August 2025. Reviewed by DP & MA on 14 August 2025.
