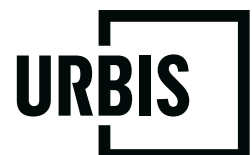




PROJECT PLUTO DATA CENTRE – 132 MCCREDIE ROAD, GUILDFORD WEST

Submissions Report –
SSD69223466

Prepared for
GOODMAN PROPERTY SERVICES (AUST.) PTY LTD
30 July 2025



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Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of Goodman Property Services (Aust.) Pty Ltd (the Applicant) in relation to State Significant Development Application reference SSD-69223466 (“SSDA”). SSDA SSD-69223466 seeks approval for a proposed data centre development at 132 McCredie Road, Guildford West (**the site**).

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in May 2025. The SSDA was placed on public exhibition for 28 days between 9th May 2025 and 5th June 2025.

This Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period. It has been prepared in accordance with the DPHI’s *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

This Submissions Report responds to all comments raised within the submissions and outlines the refinements to the proposed development that are now proposed to address the matters raised.

Overview of Submissions

The SSDA was on public exhibition between 9th May 2025 and 5th June 2025. Submissions were received from:

- Department of Planning, Housing and Infrastructure (DPHI)
- Cumberland City Council
- Fairfield City Council
- Heritage New South Wales
- Environmental Protection Authority
- Sydney Water
- Jemena
- Fire and Rescue New South Wales
- Transport for New South Wales
- Endeavour Energy

There were no other submissions received during the public exhibition period.

A Request for Further Information (RFI) was issued by DPHI on 6th June 2025.

The key issues raised in the submissions can be broadly grouped into the following categories:

- The project
- Procedural matters
- Environmental Impacts

Since only a small number of submissions were received, this Submissions Report provides a response to each individual submission within **Section 4**.

Actions Taken Since Exhibition

Following the issue of the RFI, the Applicant has confirmed with DPHI (via email correspondence dated 9th and 10th July) the acceptability of the proposed approach to noise modelling for the purposes of the Noise and Vibration Impact Assessment. Minor refinements have been made to the proposed development and updated assessments prepared to respond to the issues raised within the submissions. The updated assessments include:

- Updated Noise and Vibration Impact Assessment

- Updated Air Quality Impact Assessment
- Updated Flood Impact Assessment
- Updated Visual Impact Assessment
- Updated Aboriginal Cultural Heritage Assessment
- Updated Traffic Impact Assessment
- Updated ESD Report

Response to Submissions

The Applicant has refined the proposed development in response to the submissions and stakeholder consultation. The refinements include:

- Additional articulation has been provided on the eastern elevation of the proposed building through the introduction of geometric pattern detailing
- Horizontal shading screens have been introduced on the office building façade to provide shading and further articulation and to enhance the building's energy efficiency
- Additional tree planting (comprising six additional trees) is proposed to be introduced in the car park
- The main entrance to the office building has been recessed to provide further articulation

Additionally, the proposed generator maintenance testing regime has been updated. The proposed testing regime will now comprise two (2) generators operating at 100% load and two (2) generators idling (i.e. 0% load).

Updated Justification and Evaluation

The refinements now proposed and updated assessments undertaken do not change the previous conclusions as set out within the Environmental Impact Statement prepared by Urbis and dated 06 May 2025. The impacts of the proposed development on the natural and built environment can be mitigated, minimised or managed through the measures discussed within Section 6 of the EIS and summarised in the accompanying mitigation measures table. No changes are required to the mitigation measures previously proposed.

The proposed development is consistent with the provisions of the statutory and strategic planning framework. The site is suitable for the proposed development and the proposal is in the public interest. Accordingly, approval is recommended subject to appropriate conditions of consent.

1. INTRODUCTION

This Submissions Report has been prepared on behalf of Goodman Property Services (Aust.) Pty Ltd (the Applicant) in relation to State Significant Development Application (SSDA) reference SSD-69223466 (SSDA). SSDA SSD-69223466 seeks approval for a proposed data centre development at 132 McCredie Road, Guildford West (**the site**).

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in May 2025 (SSD-69223466). The SSDA was placed on public exhibition for 28 days between 9th May 2025 and 5th June 2025.

This Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period. It has been prepared in accordance with the DPHI's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1 EXHIBITED PROJECT

The SSDA as exhibited seeks consent for:

- Site preparation works including bulk excavation and removal of existing hard standing and structures on the site, tree and vegetation clearing, and bulk earthworks;
- Construction, fit out and operation of a 68 Megawatt data centre with a maximum building height of 25.77m (RL 45.269) (26.5m including exhaust plenum) and total gross floor area of 29,444m² comprising:
 - At-grade parking for 53 car parking spaces and 2 accessible car parking spaces
 - Two (2) loading dock spaces.
 - Two (2) levels of technical data hall floor space with incorporating a total of nine (9) data halls
 - Ancillary office space
- Provision of required utilities, including: - Fuel storage - Two (2) switch-rooms - Four (4) industrial water storage tanks
- Vehicle entry and egress driveways located along McCredie Road
- Internal access road
- Associated landscaping and site servicing
- Installation of services and drainage infrastructure and creation of associated easement
- Installation of signage

The proposed development will be constructed and operated in two stages. Stage 1 will involve the construction of the data centre building and the internal access road and the installation of site landscaping. The Stage 1 data centre building will contain five data halls (located at levels 1 and 2); associated electrical rooms, generators, storage and office rooms; and temporary switchgear. The proposed car park and two water tanks will also be constructed as part of Stage 1.

In Stage 2, the data centre building will be extended further south to incorporate an additional four data halls. The Stage 1 data centre will have a total power consumption of 34 megawatts (MW). Power to the proposed data centre will initially be provided (during Stage 1) from the Guildford West Transmission Substation located immediately to the east of the site.

The Stage 2 development will be powered via the Endeavour Energy network. The Stage 2 development will have an additional power consumption of 34MW (i.e. the final development's total power consumption will be 68MW). To facilitate this, a substation will be constructed in the northern part of the site along the McCredie Road frontage.

1.2 SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Submissions Register	Urbis
Appendix B	List of Plans for Approval	Urbis
Appendix C	Updated Architectural Plans	Greenbox
Appendix D	Updated Design Report	Greenbox
Appendix E	Updated Visual Impact Assessment	Urbis
Appendix F	Updated Traffic Impact Assessment	Ason Group
Appendix G	Updated Integrated Water Management Plan	Van Der Meer
Appendix H	Updated Landscaping Plans	Arcadia
Appendix I	Updated Landscaping Report	Arcadia
Appendix J	Updated Noise and Vibration Impact Assessment	SLR
Appendix K	Updated Aboriginal Cultural Heritage Assessment Report	Artefact
Appendix L	Updated Air Quality Impact Assessment	Northrop
Appendix M	Updated Flood Risk Assessment	BDM
Appendix N	Updated Civil Infrastructure Drawings	Van Der Meer
Appendix O	Updated Ecologically Sustainable Development Report	SLR
Appendix P	Survey Investigation Plan	Goodman
Appendix Q	Updated Infrastructure Report	Arup
Appendix R	Mitigation Measures	Urbis

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

2.1 BREAKDOWN OF SUBMISSIONS

The SSDA was publicly exhibited between 9th May 2025 and 5th June 2025. There were ten submissions received from public agencies including DPHI and Cumberland City Council. No submissions were received from any individual submitters or special community groups.

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-69223466).

A breakdown of the submissions made by group and issues raised is provided in the table below.

Table 2 Breakdown of Submissions Received

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Department of Planning, Housing and Infrastructure	4	0	0	11	0	0	0
Cumberland City Council	8	0	0	0	0	0	0
Fairfield City Council	0	0	0	0	0	0	1
Heritage New South Wales	0	2	0	0	0	0	0
Environmental Protection Authority	1	2	0	2	0	0	0
Sydney Water	2	1	0	0	0	0	0
Fire and Rescue New South Wales	0	0	0	1	0	0	0
Jemena	0	0	0	1	0	0	0
Transport for New South Wales	0	0	0	1	0	0	0
Endeavour Energy	1	1	0	0	0	0	0

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
TOTAL	16	4	0	16	0	0	1

2.2 CATEGORISING KEY ISSUES

In accordance with the DPHI's *State Significant Development Guidelines*, the issues raised in the submissions have been categorised as outlined in the table below.

Table 3 Categorising Issues Raised

Category of Issue		Matters Raised
The project	Built form	<ul style="list-style-type: none"> ▪ Building façade design ▪ Glazing system
	Data centre operations	<ul style="list-style-type: none"> ▪ Cooling system ▪ Back-up generator system
	Car parking	<ul style="list-style-type: none"> ▪ Staff roster details ▪ Car park landscaping
	Stormwater	<ul style="list-style-type: none"> ▪ Location and layouts of the existing public stormwater drainage pipes ▪ Stormwater drainage layout
	Flooding	<ul style="list-style-type: none"> ▪ Drainage swale ▪ Cutting to ground levels ▪ Maintenance of flood mitigation basins ▪ Fencing along the overland flow path up to 1% AEP flood level ▪ Flood refuge. ▪ Flood level monitoring gauge and emergency flood evacuation plan prepared. ▪ Habitable floor level
Procedural matters	Electrical Hazard Assessment	<ul style="list-style-type: none"> ▪ Electrical Hazard Assessment to be conducted prior to construction works
	Aboriginal cultural heritage	<ul style="list-style-type: none"> ▪ Aboriginal community consultation summary and documentation ▪ Updated Aboriginal Heritage Information Management System
	Environment Protection Licence	<ul style="list-style-type: none"> ▪ Environment Protection Licence not required
	Electrical connection	<ul style="list-style-type: none"> ▪ Underground connection works planning pathway

Category of Issue		Matters Raised
	Endeavour Energy Deed of Agreement	<ul style="list-style-type: none"> Consistency with agreed use of Endeavour Energy easements
Economic, Environmental and Social Impacts	Amenity	<ul style="list-style-type: none"> Visual impacts
	Noise Impacts	<ul style="list-style-type: none"> Background noise monitoring Operational noise model - Mitigated operational noise levels (best achievable outcome) Operational noise model - Operating conditions including local weather data Operational noise model - Evidence of operational impacts (annoying noise characteristics)
	Air Quality Impacts	<ul style="list-style-type: none"> Generator testing Additional exceedances during normal operations
	Traffic Impacts	<ul style="list-style-type: none"> Heavy vehicle access Construction worker parking
	Ecologically Sustainable Development	<ul style="list-style-type: none"> Urban heat effects Greenhouse gas emissions
	Flood	<ul style="list-style-type: none"> On-site detention tank design Culvert implementation as opposed to open swale
	Water and wastewater	<ul style="list-style-type: none"> Water and wastewater servicing Stormwater treatment design Recycled water servicing
	Fire	<ul style="list-style-type: none"> Fire risk and mitigation
Issues beyond the scope of the project or not relevant to the project	Power	<ul style="list-style-type: none"> Transmission lines through Council land

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in **Section 2**.

3.1 FURTHER ENGAGEMENT

Following the issue of the RFI, the Applicant has confirmed with DPHI (via email correspondence dated 9th and 10th July) the acceptability of the proposed approach to noise modelling for the purposes of the Noise and Vibration Impact Assessment.

No further engagement has been undertaken.

3.2 REFINEMENTS TO THE PROJECT

Minor refinements are now proposed to the exhibited development in response to submissions made during the public exhibition. Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

The proposed refinements comprise:

- Additional articulation has been provided on the eastern elevation of the proposed building through the introduction of geometric pattern detailing.
- Horizontal shade screens have been introduced on the office building façade to provide shading and further articulation and to enhance the building's energy efficiency
- Additional tree planting (comprising six additional trees) is proposed to be introduced in the car park
- The main entrance to the office building has been recessed to provide further articulation

Additionally, the proposed generator testing regime has been updated. The proposed testing regime will now comprise two (2) generators operating at 100% load and two (2) generators idling (i.e. 0% load).

The refinements to the eastern elevation will provide greater articulation on the building façade, generating greater visual interest within the site and providing a more stimulating interface with the Guildford West Sports Ground to the east.

The geometric pattern detailing is located along the entire length of the data centre's eastern façade. The design varies subtly across the façade and provides additional depth and visual texture. Its recessed form creates dimensional relief that responds to natural light, casting shifting shadows throughout the day.

Figure 1 East elevation detailing



Source: Greenbox (2025)

Figure 2 East elevation (NE corner) detailing



Source: Greenbox (2025)

Figure 3 East elevation detailing



Source: Greenbox (2025)

The horizontal shade screens proposed on the office façade will support a well-considered and functional façade design and have been evenly distributed to provide effective solar control and improve internal comfort.

Figure 4 Office facade (north elevation) - May 2025



Source: Greenbox (2025)

Figure 5 Office facade - May 2025



Source: Greenbox (2025)

Figure 6 Office facade - July 2025



Source: Greenbox (2025)

The introduction of additional landscaping will provide shading within the car park and increase the site's proposed canopy coverage from 7.1% to 7.3%. Six additional trees are now proposed in the car park, which will contribute to mitigating the urban heat island effect as well as softening the appearance of the data centre building beyond.

The proposed refinements are consistent with two of the key objectives for the proposed development as set out within the Environmental Impact Statement (EIS) (dated 06 May 2025), which are as follows:

- Deliver a state-of-the-art development to meet the current market demand for data storage facilities

- Achieve a high quality and sustainable development that responds to the site's context and positively contributes to the locality

Refer to the revised Architectural Plans (**Appendix C**) and Landscape Plans (**Appendix H**) for further details on the design refinements made since public exhibition.

3.3 UPDATED IMPACT ASSESSMENT

Updated assessments have been prepared to respond to the issues raised within the submissions. These include:

- Updated Noise and Vibration Impact Assessment
- Updated Air Quality Impact Assessment
- Updated Flood Impact Assessment
- Updated Visual Impact Assessment
- Updated Aboriginal Cultural Heritage Assessment
- Updated Traffic Impact Assessment
- Updated ESD Report

The findings and recommendation of the updated assessments are discussed within **Section 4 and Section 5** of this report.

4. RESPONSES TO SUBMISSIONS

Submissions were received during the public exhibition from DPHI and other public agencies. Responses to these issued are provided in the table below. No submissions were received from any community groups or members of the public.

Table 4 Response to submissions from public agencies

Summary of Issue Raised	Response	Supporting Document
NSW DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE		
Cooling system		
<p>The Department notes the analysis of cooling systems options provided does not consider alternative cooling technologies such as liquid cooling (Direct-to-chip and immersive cooling). Please provide an updated options analysis which considers all available cooling technologies.</p>	<p>A Cooling Systems Analysis Memo has been prepared by Arup. Given the memo has commercial-in-confidence information on proprietary solutions, this memo has been provided to DPHI under separate cover.</p> <p>The Arup analysis demonstrates that Option 3 is the most efficient solution and provides design flexibility that will allow it to be adapted in the future to 'liquid to chip' cooling (providing even greater efficiencies). The option is proposed to be used in the development and also has the following benefits:</p> <ul style="list-style-type: none"> ▪ a lower Peak Power Usage Effectiveness (PUE) and Annualised PUE compared to other options ▪ a lower noise emission compared to other options ▪ the proposed technology can utilise external and internal plantrooms (unlike some of the other options). <p>The noise emissions from the cooling towers are an important consideration given that the site bounds the Guildford West Sports Ground to the east and that there are residential properties to the south and east of the site.</p> <p>Whilst the proposed technology has a high peak water usage and higher annual water usage, the availability of recycled water to the</p>	N/A

Summary of Issue Raised	Response	Supporting Document
	site makes water cooled chillers and cooling towers the most appropriate solution for the site.	
<p>Please provide additional details on the level of cooling redundancy as follows:</p> <ul style="list-style-type: none"> a. the redundancy configuration for the cooling system (e.g. N, N+1, 2N+1, etc) b. the number of units and their capacity, including any back-up units c. the failover process and the duration for maintaining cooling during system failures or maintenance d. the testing and maintenance procedures for the cooling system to ensure ongoing reliability. 	The requested details are commercially sensitive. A commercial-in-confidence memo has been provided to DPHI under separate cover with the requested details.	N/A
Back-up generator system		
<p>Please provide further information regarding the proposed testing regime, including:</p> <ul style="list-style-type: none"> a. proposed load/s for each test b. confirmation regarding whether ramp up/cool down times have been factored into the proposed test durations c. confirmation whether commissioning tests would be undertaken for each back-up generator. 	<p>The proposed testing regime includes two generators tested to 100% of their design load and two generators idling at no (0%) load.</p> <p>The test duration includes a typical five-minute start up and cool down period.</p> <p>Commissioning load testing will be undertaken for each back-up generator as well as for the generator system as a whole during the data centre's construction and fitout works. Commissioning testing will occur immediately following the installation of the generator on site but prior to its operational use for the data centre.</p>	N/A

Summary of Issue Raised	Response	Supporting Document
<p>Note: Where necessary, information relating to data centre operations may be supplied under separate cover as 'commercial in confidence'.</p>		
<p>Operational Noise</p>		
<p>The NVIA has not demonstrated that the background noise monitoring data from DA2022/0759 were obtained, processed, and reported in accordance with Fact Sheets A and B of the Noise Policy for Industry. Additional unattended and attended background noise monitoring at the potentially most-affected residence is required to address this issue.</p>	<p>Unattended noise monitoring</p> <p>Unattended noise monitoring was conducted by RWDI between 26th August and 7th September 2022 for DA2022/0759. The measured data was processed according to the Noise Policy for Industry (Npfl) requirements (refer to Section 3 and Appendix A of the RWDI report) as outlined in the RWDI report (“Connect@ Smithfield 132 McCredie Road, Smithfield, NSW - Noise and Vibration Impact Assessment”, Report Reference RWDI#2205605 Version B, dated 12 December 2022).</p> <p>Additional unattended noise monitoring data (from 25th July to 5th August 2018) for NCA02 was adopted from a previous Development Application for the site at 149 McCredie Road (DA2018/347/1), which is located immediately to the north of the application site. This monitoring was undertaken by SLR and the measured data was processed according to the NPfl requirements (refer to Section 3 and Appendix B of “Smithfield Distribution Centre 149 McCredie Road, Smithfield – DA Noise Impact Assessment”, Report Reference 610.18295-R01-v2.1, dated 14 June 2019).</p> <p>The results of both the 2022 and 2018 unattended monitoring surveys above are detailed in Section 2.1 and Appendix B of the</p>	<p>Appendix J</p>

Summary of Issue Raised	Response	Supporting Document
	<p>NVIA submitted as part of this State Significant Development Application.</p> <p>As outlined in Section 2.3 of the NVIA, the monitoring locations for both the 2022 survey and 2018 survey were chosen with respect to the potentially most-affected receivers from development impacts, their proximity to the site, consideration of influences to the ambient noise levels including industrial noise and traffic noise, along with access permission and safety requirements. The unattended monitoring locations are considered to be representative of the potentially most-affected residential receivers and the data is appropriate for determining the construction and operational noise criteria. All data has been measured and processed according to the NPfl requirements.</p> <p>Attended noise monitoring</p> <p>Attended noise monitoring was undertaken by SLR on 8th April 2025 at three monitoring locations. The attended monitoring results are provided in Appendix B of the NVIA and summarised in Section 2.2 of the same report. All attended noise monitoring was captured and processed in accordance with the NSE EPA Noise Policy for Industry (NPfl), including Fact Sheets A and B of the NPfl.</p> <p>Summary</p> <p>All unattended and attended noise monitoring data was captured and processed in accordance with Fact Sheets A and B of the NPfl as confirmed within the updated NVIA enclosed with this response.</p>	

Summary of Issue Raised	Response	Supporting Document
	Accordingly, additional noise monitoring is not necessary and has not been undertaken.	
<p>The Noise and Vibration Impact Assessment (NVIA) in Appendix U of the EIS must be amended to present mitigated operational noise levels that represent the best achievable outcome. The Department understands the current predicted noise levels may be overstated due to layers of conservative assumptions, including all cooling towers operating simultaneously at the highest expected fan speed, and the addition of a 3 dB safety factor. However, the best achievable outcome should instead be predicted based on demonstrated worst-case operating scenarios for the day, evening, and night periods, rather than an unlikely assumption that exceeds the demonstrated worst case.</p>	<p>The NVIA presents mitigated operational noise levels based on the anticipated realistic worst-case operating scenarios. This includes the mitigation and management measures detailed in Section 7 of the NVIA. As set out above, the maintenance testing regime has been refined and this is reflected within the updated NVIA. Additionally, the intake design sound power levels for the backup generators has also been amended to 93dBA in the revised assessment.</p> <p>The 3dB safety factor represents an allowance for potential uncertainty and increased noise emissions from the proposal that may occur due to selection of different mechanical plant units, increase to cooling tower noise due to variable frequency drives, additional minor external mechanical plant that is not known at this stage, or other minor modifications to noise sources utilised on the site. Accordingly, incorporating this safety factor within the noise modelling predictions is considered appropriate.</p> <p>Due to the more favourable ambient conditions during the evening and night time the cooling towers may operate up to the specified 76% fan speed to run the entire cooling system without the assistance of the water cooled chillers, which results in significant reductions to power consumption. The 76% fan speed is consistent with the day time operating speed. Accordingly, using the daytime operating conditions for the cooling towers for the evening and night periods is considered appropriate and representative of the realistic worst-case scenarios.</p>	<p>Appendix J</p>

Summary of Issue Raised	Response	Supporting Document
	Overall, the modelling undertaken is therefore considered appropriate and representative of the realistic worst-case operating scenarios.	
<p>The NVIA must be updated to reference local weather data to support the specified worst-case operating conditions during the evening and night-time periods, and to clarify the dry-bulb temperature and humidity levels considered in specifying the cooling towers' operating conditions (with fan power stated at 76% of full speed). The anticipated IT load during these periods also needs to be specified.</p>	<p>The NVIA has been updated to reference the local weather data (refer to Appendix G of the updated NVIA). Weather data (and the associated ASHRAE Extreme Annual Design Conditions) has been used from the closest weather station (Bankstown Airport - 066137) to the site, which is located approximately 8.1 km to the south east.</p> <p>The conditions used for the cooling tower selection are as follows:</p> <ul style="list-style-type: none"> ▪ Wet Bulb - ASHRAE N=50 Condition +1C safety for Recirculation = 27.1C + 1C = 28.1C ▪ Open Circuit Cooling tower performance is dictated only by the wet bulb temperature. Dry Bulb and Relative Humidity affect the evaporation rate only. ▪ The IT load used for selection of the cooling towers is 100% of the facilities design capacity. ▪ The fan speed and associated noise levels for the required cooling load are provided by the cooling tower manufacturer <p>The cooling tower operational conditions used for the determination of the Fan speed and resulting noise level are determined based on the design cooling load, and the cooling tower is sized to operate at a 76% fan speed in the worst-case weather condition for the site, which has a likelihood to occur each year of 2% (ASHRAE N=50). Should this ambient weather condition occur, it will be for a very brief period.</p>	<p>Appendix J</p>

Summary of Issue Raised	Response	Supporting Document
	<p>Fans will only operate at 100% speed in the event that there are two concurrent equipment failures for each cooling plant. The likelihood of these conditions occurring simultaneously are extremely low. Should this eventuate a maximum of twelve (12) of the twenty six (26) cooling towers will need to run at 100% (the remaining Cooling towers will continue to run at 76%).</p>	
<p>There is insufficient quantitative evidence provided in the NVIA to demonstrate that data centre operational noise will not exhibit any annoying noise characteristics. Specifically, for the low frequency noise assessment, all frequencies from 10 to 160 Hz must be evaluated (see an example approach to consider low frequency noise in the context of the NSW Noise Policy for Industry, <i>Acoustics Australia</i> Vol. 48, No. 2, August 2020, pages 170-172 for further guidance). The tonality assessment must evaluate all one-third octave band frequencies from 25 to 10,000 Hz, as outlined in Table C1 of the Noise Policy for Industry. Noise source levels and characteristics can be sourced from direct measurement of similar activities (if performance monitoring details are provided in accordance with Section 7 of the Noise Policy for Industry) or from literature (if full references are provided). Note that benchmark noise emission data from similar activities may only be used if it has been justified in the context of the proposed development.</p>	<p>Additional consideration of the potential for low frequency and tonal noise is included in Section 4.2.4 of the updated NVIA.</p> <p>The Cooling Towers are expected to be the dominant noise source during normal operations. The model of Cooling Towers proposed for the development is BAC XES3E-1222-07M ENDURA/H.</p> <p>Low frequency 1/3 octave spectrum noise levels are not available from the manufacturer for the proposed cooling tower units. Accordingly, the methodology set out within <i>Acoustics Australia Vol.48 No.2 August 2020</i> has been adopted in the NVIA. This approach estimates the low frequency spectrum based on measurements of similar equipment adjusted for the cooling tower unit sound power level.</p> <p>The 1/3 octave for spectrum below 63 Hz for the cooling towers has been estimated using measurement data detailed in the Noise and Vibration Impact Assessment for a different data centre development located at 1 – 5 Khartoum Road, Macquarie Park (development application reference SSD-6325720). The Khartoum Road proposal uses the same cooling towers as those proposed for the McCredie Road development.</p>	<p>Appendix J</p>

Summary of Issue Raised	Response	Supporting Document
	<p>This approach for assessing annoying noise characteristics is consistent with that adopted for Goodman’s ‘Project Duke’ data centre development centre in Mascot (reference SSD-71368959). This acceptability of this approach has been discussed with, and confirmed by, DPHI.</p> <p>The adopted 1/3 octave spectrum for the cooling towers is included in Table 28 of the updated NVIA enclosed with this Submissions Report. Table 29 of the updated NVIA includes an example of the tonality and low-frequency assessment results based on the predicted operational noise levels at the most-affected residential receiver (a similar assessment has also been undertaken for all applicable receivers to determine the applicable corrections for annoying noise characteristics).</p> <p>As set out within the updated NVIA, no corrections have been applied for tonality, low frequency noise or intermittent noise. However, this will be reviewed prior to operation of the development when tenant requirements for specific mechanical plant are known.</p>	
Air Quality		
<p>The Department notes it is unclear whether the back-up generator/s modelled as part of the standard generator testing scenario is reflective of worst-case standard operations. Accordingly, please confirm the location of the generators modelled as part of this scenario, along with detailed justification for why the chosen location/s can be considered to reflect a</p>	<p>The previously proposed testing regime has been refined. For the avoidance of doubt, the testing regime now proposed will comprise of two generators at 100% load and two generators idling (0% load). This scenario has been assessed in the updated Air Quality Impact Assessment prepared by Northstar that is enclosed with this Response to Submissions document. To provide flexibility in the</p>	Appendix L

Summary of Issue Raised	Response	Supporting Document
<p>realistic ‘worst-case’ assessment of day-to-day operations at all nearby sensitive receptors.</p> <p>Further to the above, the Department seeks clarification on the number of generators tested during the realistic operations scenario (Scenario 2). Figure 6 of the Air Quality Impact Assessment (AQIA) in appendix T of the EIS appears to illustrate 5 discharge points under Scenario 2 and Table 15 identifies 8 generators active during Scenario 2. However, the proposed generator maintenance testing regime identifies 2 generators tested a 100% load and 6 generators with no load per test. Please clarify and update the AQIA to accurately reflect a realistic ‘worst-case’ assessment of standard operations.</p>	<p>operation of the proposed development, modelling has been performed assessing the potential concurrently over a 24/7 period. In reality, testing of the generators will be limited to between 7:00 am and 6:00 pm (8:00 am to 6:00 pm Sundays and public holidays),</p> <p>A sensitivity test was conducted to identify generator locations likely to result in the highest off-site impacts. Generators located to the north-west of the site were subsequently selected for detailed modelling under Scenario 2.</p> <p>The modelling considers the effects of building downwash on the dispersion patterns, so the most impactful generators are assessed with consideration of other dispersion factors than proximity.</p> <p>The predicted impacts of the updated modelling are set out in Section 7.2 of the updated Air Quality Impact Assessment and are less than those previously reported in the original (May 2025) report.</p>	
Traffic		
<p>The Traffic Impact Assessment (TIA) in Appendix O of the EIS has based car parking demand on a rate of one parking space per 430m² of gross floor area (GFA) based on parking survey data of other data centre developments. The Department requests an indicative staff roster be provided to identify the predicted maximum number of staff onsite at anyone given time to demonstrate the proposed parking provisions can accommodate peak parking demands.</p>	<p>At this stage, details around specific staff rosters, shift times and demand profiles are yet to be confirmed. However, Goodman anticipate that the number of operational staff will be as follows:</p> <ul style="list-style-type: none"> ▪ Data Centre engineering operations: 15 staff per shift (2 x shifts per day) plus four managers ▪ Data Centre operations: 26 staff per shift (1 x shift per day) <p>It is therefore currently anticipated that there will be up to sixty (60) staff on-site at any given time, accounting for overlapping of staff</p>	

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	<p>during shift change overs. Conservatively assuming that all staff will drive to the site on their own, this will generate a car parking demand of up to sixty (60) spaces.</p> <p>The proposed site layout and design ensure flexibility with respect to any minor variations in parking demand. A total of 53 spaces will be provided with the main car park. An overflow car parking area is also proposed near the site's western boundary, which will provide an additional thirty (30) spaces and therefore increase parking provision to eighty three (83). Accordingly, the anticipated staff (and visitor) parking demand can readily be accommodated on site.</p>	
<p>The SWEPT path analysis diagrams provided in Appendix B of the TIA appear to illustrate that heavy vehicles may mount the kerb during left-in and left-out movements into the site. The Department requests clarification that heavy vehicle access into the site can be appropriately accommodated or amend the proposed access arrangements to demonstrate uninhibited access into the site for heavy vehicles.</p>	<p>Heavy vehicles will not mount the kerb during left-in and left out movements into the site.</p> <p>The largest design vehicle swept paths have been updated to more accurately reflect the proposed driveway crossover layout and lane configuration along McCredie Road. This includes 20m articulated vehicles and 21.4 mobile crane swept paths. Any 20m articulated vehicles (as the largest regular access design vehicle) can turn left-in and left-out with no encroachment beyond the driveway design or property boundaries. Other vehicle movements have also been included, with independent movements achieved, where necessary.</p>	<p>Appendix F</p>
<p>The Department understands that approximately 350 car spaces will be required to accommodate construction worker parking, however only 260 car parking spaces are to be provided on site. The current Traffic Impact Assessment (TIA) states that "All worker parking will be accommodated wholly within the site". The Department requests further details on how construction-</p>	<p>The submitted Traffic Impact Assessment erroneously stated that all construction worker parking will be accommodated wholly within the site. This has been rectified in the updated Traffic Impact Assessment enclosed with this Submissions Report to accurately detail the intended approach to construction worker parking.</p>	<p>Appendix F</p>

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<p>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.</p>	<p>The site can accommodate approximately 260 on-site worker parking spaces during construction works. However, use of up to 90 worker parking spaces off-site may be required during peak construction periods.</p> <p>Goodman owns and operates several large lot industrial sites in the vicinity of the site (which could accommodate construction worker parking) and is committed to working with the appointed contractor to confirm off-site parking requirements. This will include formal worker transport arrangements (e.g. via the use of minibuses etc.) to ensure safe and efficient travel arrangements to the site. These details will be further investigated and documented as part of a detailed CPTMP.</p>	
<p>Urban Design and Visual Impact</p>		
<p>The Department notes Council's concerns regarding long blank walks and large block formats. The Department requests that further consideration be undertaken for façade treatment and redesign and/or vegetation screening of the eastern façade of the development addressing the Guildford West Sportsground.</p>	<p>The eastern elevation has been refined to provide additional visual interest and articulation along the site's interface with the Guildford West Sportsground. A dynamic and stylized geometric pattern that is incorporated within the precast concrete formwork is proposed across the whole of the facade.</p> <p>The pattern echoes the form of nearby vegetation, contrasting with the expansive openness of the sky above. It introduces a sense of rhythm and fluidity, animating the facade through movement and texture, and will provide additional texture and depth to the facade.</p> <p>No change is proposed to the materiality on the eastern elevation, which will comprise pre-cast concrete. The use of pre-cast concrete across the facade is critical for several reasons including:</p>	<p>Appendix C and Appendix D</p>

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	<ul style="list-style-type: none"> - The concrete panels provide excellent physical security (including blast resistance), which is critical for data centre operators. - Pre-cast concrete is fire-resistant. This is important given the equipment that data centres store. - Pre-cast concrete offers strong thermal mass, which helps regulate internal temperatures and supports Heating, Ventilation and Cooling efficiency - The mass of pre-cast concrete softens external noise - Precast elements provide robust structural capacity to support heavy equipment loads such as Computer Room Air Conditioning units, Uninterruptible Power Supply systems, and dense server racks <p>Additionally, pre-cast concrete is durable and reduces long-term maintenance compared to other cladding and structural systems. It withstands environmental wear and weathering, reducing lifecycle costs. Pre-cast concrete allows for modular construction, which is key for staged data centre developments such as that proposed. Walls and columns are manufactured off-site allowing other works to occur in parallel and reducing the potential for construction delays, which is critical for data centres where time-to-market is commercially sensitive.</p> <p>Overall, the use of pre-cast concrete across the eastern elevation is critical to the security and constructability of the data centre. Additional detailing is now proposed along the facade, which will</p>	

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	<p>provide further texture and depth that will add to the visual interest within the site when viewed from Guildford West Sportsground.</p> <p>Goodman are currently in discussions with Cumberland Council regarding a potential Voluntary Planning Agreement for contributions towards improvements to the Guildford West Sportsground, which may include planting along the western boundary of the playing fields to further screen and soften the proposed built form.</p>	
<p>The Ecologically Sustainable Development (ESD) Report in Appendix P of the EIS should be updated to provide specific information on the development's urban heat effects. Further analysis is needed to substantiate the effectiveness of the proposed measures. The analysis must also address potential localised heat rejection impacts from rooftop cooling plant and equipment, and back-up generators on surrounding receivers.</p>	<p>The ESD Report has been updated to specifically address the proposed development's urban heat effects. The urban heat effects and the effectiveness of the proposed measures are discussed in Section 3.2 and 3.2.2 of the updated report and summarised below.</p> <p>To mitigate the urban heat island effect, a range of integrated mitigation measures have been incorporated within the proposed development including:</p> <ul style="list-style-type: none"> ▪ The glazed facade on the northern frontage of the building will incorporate a double-layered louvre shading system to reduce reliance on reflective glass. ▪ A non-reflective glazing system with a total U-value of 4.2 and a Solar Heat Gain Coefficient (SHGC) of 0.42 is proposed. It is anticipated that the proposed glazing system will satisfy the NCC Section JV3 requirements. A Section J report is appended to the updated ESD Report (refer to Appendix O). ▪ Existing trees have been retained as far as possible and supplemented by additional landscaping within the site. Additional trees are now proposed to be introduced within the car 	<p>Appendix O</p>

Summary of Issue Raised	Response	Supporting Document
	<p>to provide additional canopy coverage and shading within the site and reduce surface heat. The additional landscaping will increase the proposed canopy cover to 7.3%</p> <ul style="list-style-type: none"> ▪ Solar panels will be provided on the roof of the data centre building, which will mitigate urban heat by providing passive shading that contributes to lower rooftop temperatures. The solar panels will provide further sustainability benefits by reducing the proposed development’s reliance on the electricity network. <p>The implementation of the proposed shading system is expected to result in a reduction of energy consumption by approximately 1,300 kWh per year. Additionally, the implementation of the rooftop studies may result in reducing roof surface heat by between 5 – 10 degrees during peak summer conditions.</p> <p>Heat rejection impacts</p> <p>All Generator and Cooling Tower heat will be rejected from the roof directly upwards, where it is then mixed and dispersed into the ambient air.</p> <p>Due to the evaporative cooling process used by the cooling towers, the discharge air temperature is lower than or equal to the ambient dry bulb temperature (for example on a hot day with an ambient dry bulb temperature of 40C the air discharged by the cooling tower will not exceed 40C DB).</p> <p>All of the Generator discharge of hot air is routed to the roof of the building where it is expelled, providing additional opportunity for mixing into the ambient air before it reaches nearby areas. During</p>	

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	<p>normal operation, a maximum of 2 Generators are run for regular testing. The duration of this testing is 95 minutes per 2 Generators. As such the likelihood of heat discharge remains low.</p>	
<p>The ESD Report should be updated to provide a detailed breakdown of greenhouse gas emissions (GHG) anticipated to be generated by the operation of the development including Scope 1, Scope 2 and Scope 3 emissions. The ESD Report should also demonstrate the total savings on CO2 equivalent as a result of the ESD measures implemented into the development.</p>	<p>A detailed energy model has been developed to assess the electricity usage of both a National Construction Code reference building and the proposed building (refer to Section 3.1.8.4 of the updated ESD Report). The modelling has shown that:</p> <ul style="list-style-type: none"> ▪ Electrification and Scope 1 Emissions: The proposed building is fully electrified, with no reliance on gas or on-site fuel sources under normal operation. The only exception applies to emergency scenarios involving on-site generator use. As a result, Scope 1 emissions are considered negligible during standard operation. ▪ Scope 2 Emissions: The majority of reported energy consumption relates to indirect emissions associated with purchased electricity, representing the building's Scope 2 contribution to its carbon footprint. Greenhouse gas emissions for Scope 2 are estimated to be 467.924 MWh, which is significantly less than the emissions for the reference building (580.621 MWh). ▪ Scope 3 Emissions: These will be quantified once relevant data becomes available for business travel, employee commuting, waste disposal, and purchased goods. Preliminary estimates suggest Scope 3 emissions may contribute an additional 5–10% to total greenhouse gas output. 	<p>Appendix O</p>

Summary of Issue Raised	Response	Supporting Document
	<p>The sustainability initiatives integrated into the development deliver a 19.4% reduction in overall CO₂ emission when compared with a reference / base case building assuming similar IT equipment load for both scenarios.</p>	
<h2>CUMBERLAND CITY COUNCIL</h2>		
<h3>Building design</h3>		
<p>Concern is raised in relation to the visual amenity of the future substation and the new data centre when viewed from Guildford West Sportsground. New industrial buildings shall be designed to avoid long blank walls and large blocks of one material.</p>	<p>A landscaped setback is proposed along the site's northern frontage. The landscaping will include dense multi-layered native planting and trees that grow to a mature height of 6 metres, which will provide significant screening to the future substation that will enhance the amenity of this part of the site.</p>	<p>Appendix C and Appendix D</p>
<p>As such, the façade of the development shall be reviewed to ensure the long blank concrete sheeting walls shall be redesigned to incorporate various architectural features, materials and finishing, design or potentially wall art to minimise visual impact of the proposed data centre building.</p>	<p>The treatment of the substation will be subject to further discussions with Endeavour Energy.</p> <p>Refinements are proposed to the eastern elevation of the data centre building to provide greater articulation and visual interest when viewed from Guildford West Sportsground. The proposed refinements include the introduction of a geometric pattern articulated through the precast concrete external walls. The pattern will vary</p>	

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	<p>subtly across the façade and provides additional texture and depth along this elevation.</p> <p>Overall, the eastern elevation will have a high-quality and contemporary appearance. The proposed refinements provide additional visual interest within the site whilst enabling the development to respond to the construction and operational requirements of the data centre.</p>	
Front building facade		
<p>As shown on the architectural plans, glass walls will be used for the proposed new office area located to the front of the new data centre building which is be minimised and is not ideal for urban heat. Accordingly, it is recommended the external front façade of the office area to be amended to incorporate various architectural features, materials and finishing and design to minimise the use of reflective glass.</p>	<p>The glazed facade will provide a contemporary and high quality appearance that will activate the northern facade of the proposed development and distinguish the office component from the proposed data halls. The glazed facade will optimise natural daylight within the office and contribute to the high level of amenity for future staff.</p> <p>Black mullions and transoms on the facade will create consistent horizontal articulation.</p> <p>The refinements now proposed include the introduction of horizontal shade screens on the office facade. The screens will be evenly distributed to provide effective solar control and improve internal comfort and will support a well-considered and functional façade design</p>	

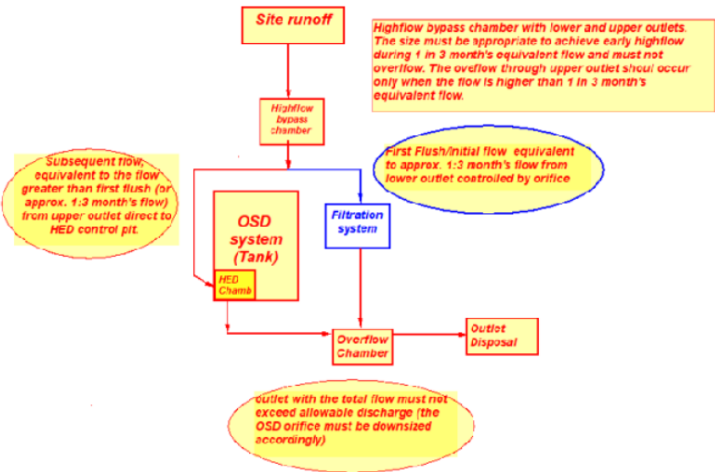
Summary of Issue Raised	Response	Supporting Document
	<p>The glazing system utilised within the office will be compliant with NCC Section J requirements. A detailed Section J compliance report will be provided before the relevant construction certificate is issued for the site. A non-reflective glazing system with a total U-value of 4.2 and a Solar Heat Gain Coefficient (SHGC) of 0.42 is currently proposed. It is anticipated that the proposed glazing system will satisfy the NCC Section JV3 requirements (a Section J report is appended to the updated ESD Report (refer to Appendix O)).</p>	
Car parking area		
<p>The proposal has been designed to provide a large car parking area located forward of the proposed data centre building. Accordingly, landscaping shall be planted in the rate of 1 shade tree for 10 spaces shall be planted within the large open car parking area for new industrial development.</p>	<p>Additional landscaping (comprising six Water Gum trees) has been introduced into the car parking area. The additional landscaping will provide further shading and increase the site's canopy coverage.</p>	Appendix H and I
Survey investigation plan showing the existing public stormwater pipelines		
<p>A survey investigation plan shall be provided with locations, layout of the existing public stormwater drainage pipes showing the size, levels (invert levels, obvert levels, and existing ground levels), offsets from the adjacent boundaries (coordinates), at the intersection with the boundaries and at every change of directions (deviation from the preceding direction) for the protection measure</p>	<p>The requested information is enclosed with this Submissions Report in Appendix P.</p>	Appendix P
Flooding Requirements		

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<p>The flood impact assessment (FIA) report version 05 dated 23 April 2025 prepared by BMT shall form part of the condition of consent.</p>	<p>Noted.</p>	<p>N/A</p>
<p>The proposed drainage swale work along the eastern boundary as stated in the FIA report as flood mitigation measure to encourage flow away from neighbouring properties to the east is recommended to convert to approx. 0.5m x 1m culvert. However, the dimension of the culvert must be determined by the applicant's consultant in consultation with the Council's Engineer. The culvert must be maintained by the property owner. In this regard a positive covenant and restriction on the use must be created for the maintenance.</p>	<p>The replacement of the swale with a drainage culvert has been considered but comprises a less appropriate design solution for the site for the following reasons:</p> <ul style="list-style-type: none"> ▪ A 0.5m x 1m culvert would have significantly less capacity to convey flow compared to the proposed swale. The culvert would be limited to a single inlet and outlet location prone to concentrated velocities and potential scouring in very rare events. A culvert would also be prone to blockage due to the transfer of debris material during flood events, even assuming full maintenance in the lead-up. ▪ The proposed swale will allow for at least partial transfer of flows for all events up to and including the Probable Maximum Flood and aligns with the existing overland flowpath within this region. ▪ An open swale also allows flood water along the boundary to enter the swale and convey the flood water. A culvert (which is closed) can only accept water at its commencement. This will increase the hazard level of the flood water leaving the closed culvert. ▪ The swale will enable existing trees located adjacent to the site's eastern boundary to be retained, providing ecological and urban heat island benefits. Conversely, the excavation and construction 	<p>Appendix M</p>

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	<p>of a culvert would likely disturb these trees and require their removal.</p> <ul style="list-style-type: none"> ▪ The eastern part of the site is affected by an Endeavour Energy easement. No built structures are permitted within the easement. Accordingly, a culvert is not viable in this location. <p>Accordingly, no changes are proposed to the drainage strategy.</p>	
<p>The proposed flood mitigation basin to be provided on the northern portion and at the south-eastern corner of the site (as outlined in section 4 of the report), to provide additional volume storage must also be maintained by the owner of the proposed development</p>	<p>Noted. The flood mitigation basins will be maintained by the owner of the proposed development.</p> <p>A flood mitigation basin is only proposed in the northern part of the site. The previously submitted Flood Assessment erroneously stated that a flood mitigation basin would also be provided in the south east corner of the site. However, the proposed development does not include a flood mitigation basin within the south-eastern corner of the site so that the existing trees can be retained. The Flood Assessment has been updated to correct this.</p>	<p>Appendix M</p>
<p>Natural ground level external of the building must be maintained and it is recommended that any major cutting to change the ground levels of the site be avoided where possible.</p>	<p>No major cutting is proposed as part of the development. Cutting is predominately limited to the northern part of the site as shown in the 'Cut and Fill Plan'.</p> <p>Natural ground has been maintained as far as possible. However, re-grading is proposed within the site to provide suitable access and ensure that the building floor level is located is above the Flood Planning Levels.</p>	<p>Appendix M</p>
<p>All southern and northern fencing along the overland flow path up to 1 % AEP flood level must be constructed of permeable</p>	<p>The southern and northern fencing located along the overland flow path will be constructed of Palisade fencing that will allow for the free</p>	<p>Appendix C</p>

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pool type metal fence or with opening to provide passage for the free flow of flood water.	flow of flood water. Please refer to the updated architectural plans (drawing no. 0000015)	
Future occupants of the development must seek refuge in the area that is flood free or higher than PMF level inside the building unless otherwise directed by the SES or other emergency management personnel.	Noed. A shelter-in-place approach will form part of the emergency management plan prepared for the site. It is anticipated that the emergency management plan can be secured via an appropriately worded planning condition.	Appendix M
A flood level monitoring gauge or device is recommended for the site and appropriate signage should be installed to make the future occupants aware of the flooding situation. An emergency flood evacuation plan must be prepared and made available for the future occupants.	A flood level monitoring gauge or device will be provided and detailed in the emergency flood evacuation plan. It is anticipated that the emergency flood evacuation plan can be secured via an appropriately worded planning condition.	Appendix M
Habitable floor level to be 500mm above the 1% AEP flood level		
The habitable floor level, i.e. the finished floor level of the buildings shall be at least 500mm above the associated 1% AEP flood level at the respective locations of the proposed buildings. The non-habitable area such as the garage, alfresco shall be at least 150mm above the associated 1% AEP flood level as per recommendation of the flood impact assessment report.	The proposed development complies with this requirement – the finished floor level of the development is 19.5m. This is 500mm above the maximum flood levels (RL 19m) in the 1% AEP event.	Appendix M
Stormwater management		
For clarity a single drawing showing the entire stormwater drainage layout should be provided.	The entire stormwater drainage layout is shown in the civils plans enclosed with this Submissions Report (refer to the 'General Arrangement Plan' drawing SY242-012_SSDA-C100_C)	Appendix N

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<p>The OSD system should account for the tail water level i.e. the predicted 1% AEP flood level at the point of discharge into the public drainage system. The flood report indicated the flood level at the point of disposal approx. 18.5m to 19m AHD. Hence, the OSD system will be unable to function as intended. The system needs redesign to account for the flood.</p>	<p>The northern part of the site is impacted by overland flooding during the 1% AEP flood event. Accordingly, OSD cannot be provided for the northern part of the site above the 1% AEP (as the OSD storage would need to be above ground).</p> <p>The proposed OSD provides storage and discharge above the obvert of the Council trunk drainage and will therefore provide a substantially improved OSD performance compared to that approved under the previous warehouse DA (reference DA2022/0759) for the site.</p> <p>The proposed OSD will function as intended for the site critical storm events as the peak storm flows from the site occur during short duration storm events, whereas the catchment flood event occurs during a longer duration flood event. Due to the longer time of concentration for the floodway, the OSD will have detained and reduced peak runoff for the site as intended. The Upper Parramatta River Catchment Trust OSD Handbook allows for the design of a drowned outlet.</p> <p>During a 1% AEP flood event through the site, the flood affected OSD will still provide a flood benefit as it has provided an increased flood storage volume and will ensure that the flood water is more slowly released after the peak of the flood event.</p>	<p>N/A</p>
<p>Water Sensitive Urban Design Measure / Stormwater Quality improvement measure</p>		

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<p>Based on the Information provided the stormwater quality treatment system does not appear to function as intended. The overflow from the filtration chamber is likely to carry pollutants and bypass the treatment system. The treatment system should be designed as illustrated in the diagram below.</p> 	<p>Stormwater will be treated in a Gross Pollutant Trap, which has a high flow bypass system. This will ensure that gross pollutants and floating material is not re-suspended in the stormwater.</p>	<p>N/A</p>
<p>The details of the water quality treatment system should be provided for clarity and appreciate the functioning of the system.</p>	<p>Details of the water quality treatment system are provided in the updated Civil Infrastructure Drawings enclosed with this Submissions Report. Refer to drawings SY242-012_SSDA-C452; and SY242-012_SSDA-C453_C.</p>	<p>Appendix N</p>
<p>FAIRFIELD CITY COUNCIL</p>		
<p>Council officers met with the TransGrid representatives in August 2024 regarding the above project. At that meeting a</p>	<p>Noted. Goodman and Endeavour Energy will continue to liaise with Council and other relevant stakeholders regarding the underground</p>	<p>N/A</p>

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<p>number of options to service the site with high voltage underground cables from a nearby substation were presented. One option involved running the underground transmission through Councils Rosford Street Reserve. This would require restrictions and easements restricting use of those parts of the public reserve.</p> <p>Council officer do not support transmission lines going through Council land and identified a number of other options to the TransGrid which did not use Council land.</p>	<p>transmission lines. Notwithstanding, the resolution of this is not relevant to the determination of the SSDA application.</p>	
<h2>ENVIRONMENT PROTECTION AUTHORITY</h2>		
<p>Based on the information provided, the application does not appear to require an environment protection licence under the Protection of the Environment Operations Act 1997. The EPA is not considered to be the appropriate regulatory authority as the Applicant is not a NSW public authority, nor does the application involve land regulated under the Contaminated Land Management Act 1997.</p>	<p>Noted.</p>	<p>N/A</p>
<p>The EPA recommends that Cumberland City Council is consulted in relation to the application as the relevant ARA.</p>	<p>Noted.</p>	<p>N/A</p>
<p>The EIS estimates the application will generate GHG emissions greater than 25,000t CO₂-e per annum during its operational life. The application is not subject to the requirements in the NSW Guide for Large Emitters, as the project does not appear to require an Environment Protection Licence. The Applicant</p>	<p>Noted. As set out in the ESD Report, the proposed development will target the use of Green Power to reduce the total greenhouse gas emissions produced. A range of energy efficiency measures are also proposed as detailed in the report.</p>	<p>Appendix O</p>

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<p>should be reminded of their potential obligation to report under the National Greenhouse and Energy Reporting Act (NGER Act) given their estimated scope 1 and scope 2 emissions.</p> <p>The EPA notes the application will install a 500KW PV system on the roof but also recommends that high energy users reduce their scope 2 emissions as much as practicable and consider measures such as those listed below.</p> <ul style="list-style-type: none"> • Energy efficiency practices • Purchasing renewable energy certificates • Entering into green power purchase agreements <p>Where any GHG mitigation measures are proposed by the Applicant, the EPA suggests that DPHI consider including consent conditions that will require implementation of these commitments.</p>	<p>Goodman is committed to achieve carbon neutrality across its global operations.</p>	
<p>The Air Quality Impact Assessment (AQIA) predicts several exceedances of the 1-hour NO₂ concentrations during emergency conditions (Scenario 1) and indicates that at worst-case scenario (Scenario 1), the project is predicted to exceed the 24-hour average PM₁₀ and PM_{2.5} assessment criteria at several receptor points.</p> <p>The AQIA addresses the low likelihood of the emergency scenario occurring and proposes mitigation measures to address potential impacts.</p>	<p>Noted.</p> <p>As outlined above, the routine maintenance scenario (i.e. Scenario 2) has been updated. The predicted impacts of this scenario are now lower than previously reported due to the reduction in generators to be tested. Updated results for this scenario are presented in Section 7.2 of the updated Air Quality Impact Assessment. The results demonstrate that there will be no additional exceedances during normal operations.</p>	<p>Appendix L</p>

Summary of Issue Raised	Response	Supporting Document
<p>It is noted that Scenario 2 represents normal operating conditions. In accordance with Approved Methods for Modelling and Assessment of Air Pollutants in NSW (2022), there should be no additional exceedances as a result of the application during normal operations.</p> <p>The EPA would recommend DPHI consider consent conditions relating to air quality be applied. Also, the EPA is willing to be consulted further as part of preparing any draft conditions for the project.</p>		
<p>Based on the information provided, the application does not appear to exceed the thresholds in Schedule 1 of the Protection of the Environment Operations (POEO) Act 1997, particularly relating to Clause 9 Chemical Storage (diesel storage) and Clause 17 Electricity Generation (operation of back up plant).</p> <p>The EPA suggests DPHI consider implementing operational limits as part of development consent to ensure the application does not exceed the threshold in the POEO Act to operate without obtaining an Environment Protection Licence.</p> <p>It is the responsibility of the Applicant to apply for an EPL if they determine that the total testing time of the generators is expected to exceed 200 hours or storage of diesel fuel exceeds 2,000 tonnes.</p>	<p>The total testing time of the proposed generators will not exceed 200 hours and storage of fuel on site will not exceed 2,000 tonnes. Accordingly an Environment Protection Licence is not required.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
HERITAGE NSW		
<p>The Aboriginal community consultation summary and documentation provided in the ACHAR contains a number of discrepancies that require clarification and/or additional information.</p> <p>Evidence of the correspondences are required to assist in Heritage NSW's evaluation of the adequacy and completeness of the consultation process. This evidence can comprise of copies of dated email records with all relevant email addresses shown and may be provided to Heritage NSW separately.</p>	<p>An updated Aboriginal Cultural Heritage Assessment (ACHAR) has been prepared and is enclosed in Appendix K. The updated ACHAR:</p> <ul style="list-style-type: none"> ▪ Addresses the comment (dated 17th June 2024) received from the Kamilaroi Yankuntjatjara Working Group. The updated ACHAR states that <i>"It is acknowledged that Prospect Creek is located to the south of the study area and may have been utilised by Aboriginal people. Material evidence of the occupation of this area by Aboriginal people may be present in intact landforms associated with Prospect Creek, such as the land immediately south of the study area, to the north of Prospect Creek. However, aerial photographs and the results of the survey indicate that the study area has been subject to historic earthworks, and it is considered unlikely that Aboriginal objects could be concealed within the study area"</i>. No additional test excavations were therefore considered necessary. ▪ Includes an updated Table 2 with details of all Registered Aboriginal Parties (RAPs) ▪ Confirms and provides evidence that GLALC have been registered as a RAP for the projects. The ACHAR methodology and draft ACHAR were issued to GLALC for comment. 	<p>Appendix K</p>

Summary of Issue Raised	Response	Supporting Document
	<ul style="list-style-type: none"> Confirms and provides evidence that the Dharug Custodian Aboriginal Corporation were issued a copy of the draft ACHAR for comment. 	
<p>The Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. As per Requirement 1b of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, AHIMS searches must be contemporaneous with the project (less than 12 months). Please update the AHIMS search and review for currency.</p>	<p>The previous AHIMS search was re-exported on 19th June 2025. No additional sites have been registered within the search area since the initial search that was undertaken in April 2024.</p>	<p>Appendix K</p>
<p>On the basis that the above comments are adequately addressed, Heritage NSW has provided recommendations in relation to Draft Conditions of Consent as included in Attachment A.</p>	<p>Noted. The matters raised in Heritage NSW's comments have been addressed in the updated ACHA and above.</p>	<p>N/A</p>
<h2>SYDNEY WATER</h2>		
<h3>Water and Wastewater servicing</h3>		
<p>Our preliminary assessment under CN222067 and CN215366 have indicated that that water and wastewater servicing should be available for the proposed development.</p> <p>Amplifications, adjustments, deviations and/or extensions will be required.</p> <p>The proponent is to continue liaising with their Water Servicing Coordinator (WSC) and Sydney Water case manager on</p>	<p>Noted. The Applicant will continue to liaise with Sydney Water as necessary.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
servicing infrastructure delivery and design at the Section 73 application stage.		
Recycled Water Servicing		
Recycled water servicing is being provided via a third-party service provider and therefore requires no comments from Sydney Water.	Noted.	N/A
Next Steps		
<p>Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent.</p> <ul style="list-style-type: none"> o Section 73 Compliance Certificate o Building Plan Approval 	Noted. The Applicant does not object to the inclusion of these conditions.	N/A
FIRE AND RESCUE NEW SOUTH WALES		
<p>The EIS details a Data Centre with Battery Energy Storage. It has been the experience of FRNSW that Data Centres present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 20221. FRNSW therefore recommend the following conditions:</p> <ol style="list-style-type: none"> 1. Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous 	Noted. The Applicant is willing to accept the proposed conditions.	N/A

Summary of Issue Raised	Response	Supporting Document
<p>Industry Planning Advisory Paper (HIPAP) No.22 and submitted to FRNSW for review.</p> <ul style="list-style-type: none"> - The FSS is to be used to guide the design and as such it is FRNSW Position3 that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ). - The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets4. <p>2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.15.</p> <p>3. Prior to occupation or 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</p>		
JEMENA		
<p>Jemena’s closest high pressure natural gas pipelines/mains (Sydney Primary Main & Secondary Main) run along McCredie Road approximately 4 m and 8m from the front boundary of the proposed Data Centre at, 132 McCredie Road, Smithfield, NSW.</p> <p>Given that the scope of works includes significant upgrades to the electrical substation to accommodate for the proposed data</p>	<p>Noted. The Application has commenced the Jemena application process.</p> <p>The requirement for an Electrical Hazard Assessment can be secured via an appropriately worded planning condition.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
<p>center, Jemena have concerns regarding any High voltage cabling and earthing works near our assets along McCredie Road. As a result Jemena will most likely require an Electrical Hazard Assessment (EHA) to be conducted and submitted to Jemena for review and approval prior to any construction works taking place at this site.</p> <p>Jemena requests that the proponent make an application via the Jemena portal, prior to any construction works taking place within the vicinity of Jemena assets. This is to ensure Jemena can review proposed methodologies and scope of works.</p>		
<h2>TRANSPORT FOR NEW SOUTH WALES</h2>		
<p>TfNSW has reviewed the EIS and advises that the proposed development is unlikely to have a significant impact on the classified road network. As such, TfNSW has no further comment.</p>	<p>Noted.</p>	<p>N/A</p>
<h2>ENDEAVOUR ENERGY</h2>		
<p>The conditions and advice previously provided for development application DA2022/0759 also apply</p>	<p>Noted. The current design is largely consistent with the previously approved flood modelling, with no significant changes in flooding extent.</p>	<p>N/A</p>
<p>Please note Endeavour Energy's preference is for the underground connection works between the private substation on the data centre site and Endeavour Energy's Guildford West Transmission Substation to be assessed under Division 5.1 of</p>	<p>Noted. The SSDA does not seek approval for the underground connections works to the Guildford West Transmission Substation. Approval for these will be sought via the Part 5 pathway.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
<p>Environmental Planning and Assessment Act 1979 (NSW), rather than via a modification of the proposed Part 4 consent. Accordingly provision must be made for the required conduits which will cross Endeavour Energy's easements. There is currently a concrete block fence between Guildford Transmission Substation and the data centre which needs to be protected from any damage</p>		
<p>Any works (temporary or permanent) need to be referred to Endeavour Energy's Easements Officers for assessment and possible approval if they meet the minimum safety requirements and controls.</p> <p>Endeavour Energy's Easements Officers have provided the following advice:</p> <p><i>"Endeavour Energy (EE) has been in consultation with Goodman on the site for a few years and has entered into a Deed of Agreement (DoA) on the proposed use of the EE easement on the site based on the requirements on EE's Network Planning Branch.</i></p> <p><i>The submitted plans appear to be in line with the agreed use of the EE easements.</i></p> <p><i>The deed provides for the proponent to:</i></p> <ol style="list-style-type: none"> <i>1. Install several spare underground conduits across the site the within the easement for future cables to upgrade of the electricity network.</i> 	<p>Noted. The applicant will continue to liaise directly with Endeavour Energy to ensure that any works and/or use of the easement is approved and to fulfil the terms of the Deed of Agreement.</p>	<p>N/A</p>

Summary of Issue Raised	Response	Supporting Document
<p>2. <i>Undergrounding an existing 33 kV overhead powerline across the site in return for the release of a 9.29 m wide part of the 18.29 m easement created by dealing J11865.</i></p> <p>3. <i>Both 1 & 2 will be done as Asset Relocation Projects (ARP) handled by EE's Customer Network Solutions Branch. 2</i></p> <p>4. <i>Ensure no concrete hardstand, paving, kerb and guttering is to be installed within 5 m radius of the base of the existing power poles.</i></p> <p>5. <i>Install access gates in the fence line at each pole location running along the eastern side of the property within the EE easements.</i></p> <p>6. <i>Padmount substation no. 18600 will ultimately be removed under an ARP project.</i></p> <p>7. <i>Undertake minimal ground surface works with the EE easements.</i></p> <p><i>The deed provides for EE to:</i></p> <p>1. <i>Agreed to permit the stormwater detention basin to be constructed within the easement. This basin must be at least 5 m from the existing power poles. A letter has been provided to the proponent confirming this use.</i></p> <p>2. <i>Permit the access driveways and services to cross the easement from the McCredie Road side to the data centre.</i></p>		

Summary of Issue Raised	Response	Supporting Document
<p>3. Allow minimal landscaping in the EE easements that do not impact the electricity assets or access to them.</p> <p>4. Sign any document needed to register the easement release.</p> <p>5. Support the Development Application (DA) in connection with the works in the EE easements and not object to the DA as it relates to the agreed use of the EE easements”</p>		

5. UPDATED PROJECT JUSTIFICATION

This section provides an updated justification and evaluation of the project as a whole.

5.1 PROJECT DESIGN

Minor refinements are now proposed to the previously exhibited development. The proposed refinements will introduce additional canopy cover within the site and greater articulation along the eastern and northern elevations of the data centre building.

The additional landscaping will provide greater shading within the site, enhancing amenity for future staff and visitors, contribute to mitigating the urban heat island effect, and soften the appearance of the data centre building.

The additional full-height detailing proposed on the eastern elevation of the building will provide greater articulation, texture and depth along the façade. The refinement will create a more interesting and stimulating appearance when viewed from the east of the site including at its interface with the Guildford West Sportsground. Additionally, the recessed entrance and horizontal shading screens that have been introduced on the office façades will complement the contemporary appearance of the building and provide both greater articulation and internal comfort and solar control.

The design of the development remains in keeping with the site context and its surroundings. The refinements do not include any changes to scale, massing or layout of the exhibited development, which is entirely appropriate for the site as discussed within the EIS.

5.2 STRATEGIC PLANNING CONSISTENCY

An assessment of the proposed development against key strategic planning policy and guidance is set out within the Environmental Impact Statement (EIS) prepared by Urbis (dated 06 May 2025) that formed part of the original submission under SSD-69223466. The EIS concludes that the proposed development is consistent with the strategic planning framework.

The refinements now proposed do not result in any change to the previous assessment.

5.3 STATUTORY PLANNING CONSISTENCY

The EIS concludes that the proposed development complies with the relevant provisions of the statutory planning framework, including all applicable provisions set out within the Cumberland Local Environmental Plan 2021.

The refinements now proposed do not introduce any new variations to the existing planning controls and the development. Accordingly, the proposed development will remain fully consistent with the statutory planning framework.

5.4 COMMUNITY AND STAKEHOLDER VIEWS

Community and stakeholder engagement was undertaken in preparation of the SSDA as detailed within the EIS. This included engagement with various government agencies and community groups, which informed the design of the development where reasonably possible.

Additional community and stakeholder engagement has not been undertaken to inform this Submissions Report. Notwithstanding, the proposed refinements to the development seek to respond to submissions received during the public exhibition of the SSDA.

5.5 ENVIRONMENTAL IMPACT

The environmental impacts of the proposed development have been considered in detail in the EIS. Updated assessments have been undertaken in respect of the following matters as part of the preparation of this Submissions Report:

- **Built form and urban design:** The proposed built form and urban design remains largely unchanged. No change is proposed to the scale, massing or layout of the proposed data centre, which remain entirely appropriate for the site and its setting within the Guildford West Industrial Area. The refinements now proposed to the eastern elevation of the data centre and office façade will provide additional articulation, greater visual interest within the site, and further activation at the development's interface with the adjoining sports ground. The data centre will continue to present as high-quality and contemporary building that enhances the character of the surrounding area.
- **Noise and vibration impact assessment:** An updated assessment has been prepared in response to the submissions received from DPHI. The assessment considers the revised maintenance testing regime, which includes two generators at 100% load and two generators idling. Greater sound power levels have also been utilised for the back-up generators in the updated NVIA.

Notwithstanding the updated modelling, consistent with the originally submitted report, the updated assessment concludes that:

- Construction noise levels are generally expected to comply with the management levels when noisy equipment is not in use and at receivers without direct line of sight to the works. Mitigation measures are proposed to address the potential construction impacts
- Operational noise levels are expected to comply with the trigger levels at the nearest receivers.

Accordingly, the proposed development is appropriate from an acoustic impact perspective.

- **Air Quality Impact Assessment:** An updated assessment has been prepared in response to the submissions received from DPHI. Modelling has been undertaken for the updated maintenance testing regime (i.e. an updated 'realistic operations scenario') now proposed. The predicted impacts of this updated scenario are lower than those previously reported due to the reduction in generators to be tested. Accordingly, the conclusions of the original Air Quality Impact Assessment are unchanged – during the operational phase, the proposed development will not likely result in additional exceedances of the relevant air quality at any identified receptor location. The predicted incremental concentrations for all assessed pollutants are significantly below the relevant criteria under realistic operations where the back-up generators are appropriately operated under the testing schedule.
- **Visual Impact Assessment:** The Visual Impact Assessment (VIA) has been updated to consider the refinements now proposed to the eastern elevation of the data centre building. Notwithstanding, the conclusions of the original VIA remain unchanged – the proposed development has a high-level of visual compatibility with surrounding development and can be supported on visual impact grounds.
- **Traffic Impact Assessment:** An updated assessment has been prepared in response to the submissions received from DPHI. The conclusions of the updated assessment are consistent with the report originally submitted – overall, the proposed development is supported from a traffic and parking perspective.
- **Flood Impact Assessment:** An updated Flood Impact Assessment has been prepared. The conclusions of the updated assessment are consistent with the report originally submitted.
- **Aboriginal Cultural Heritage:** An updated Aboriginal Cultural Heritage Assessment has been prepared and provides additional evidence of the consultation undertaken with Registered Aboriginal Parties. The conclusions of the report originally submitted are unchanged.
- **Ecologically Sustainable Development:** An updated assessment has been prepared in response to the submissions received from DPHI. The refinements now proposed include the introduction of additional tree planting and blades on the office façade, which will provide additional shading and solar control. The additional landscaping as well as the other integrated design measures such as the installation of solar panels on the roof the data centre will contribute to mitigating the urban heat island effect. The shading blades will also reduce reliance on non-reflective glazing and energy consumption. The proposed development will incorporate a range of energy efficiency measures and remains suitable from an ESD perspective.

Additionally, the proposed refinements include the introduction of additional canopy coverage within the site, which will further screen and soften the appearance of the proposed data centre and provide ecological benefits including mitigating the urban heat island effect.

Overall, the proposed development remains consistent with the principles of Ecologically Sustainable Development for the reasons set out within the EIS.

Impacts on the natural and built environment can be mitigated, minimised or managed through the measures discussed within Section 6 of the EIS and summarised in the accompanying mitigation measures table. No changes are required to the mitigation measures previously proposed.

5.6 SUITABILITY OF THE SITE

The site is highly suitable for the proposed development for the reasons set out within Section 7 of the EIS. The refinements now proposed do not alter the site's suitability for the proposed development.

5.7 PUBLIC INTEREST

The proposed development is considered to be in the public interest for the reasons set out in the EIS being:

- The proposal is consistent with relevant State and local strategic plans and complies with the relevant State and local planning controls
- The proposal will provide a total of 487 FTE jobs during construction and 60 jobs once operational.
- The proposed data centre will address a growing requirement for data storage infrastructure within western Sydney. In doing so, the proposal will support local businesses and support cybersecurity.
- The proposal comprises the redevelopment of a vacant and underutilised brownfield site. It will contribute to the western Sydney economy and further strengthen Guildford West as a leading industrial area.
- The proposal will incorporate landscaping and utilise a range of building materials and articulation, which will stimulate visual interest from outside the site.
- An extensive assessment of environmental impacts (including bulk and scale, overshadowing, visual impact, air quality, noise, traffic, flooding) has been undertaken to ensure any adverse environmental impacts of the proposed bulk and scale of the development on nearby land uses is minimised, and where required, managed through mitigation measures

The previously submitted table of mitigation measures (which has not required updating) is provided at **Appendix S** which has regard to the economic, environmental and social impacts of the proposal.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed refinements and clarifications. On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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