

14 April 2026

TfNSW Reference: SYD25-00982/04
DPHI Reference: SSD-92743706



Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Patrick Copas

**ADVICE ON EIS FOR MAMRE ROAD DATA CENTRE CAMPUS
706-852 MAMRE ROAD, KEMPS CREEK**

Dear Ms. Fishburn,

Thank you for the opportunity to provide advice on the Environmental Impact Statement (**EIS**) for the above-mentioned State Significant Development (**SSD**) proposal at 706-852 Mamre Road, Kemps Creek.

TfNSW has reviewed the EIS and notes that the site was previously approved under SSD-30628110, determined on 20 February 2026, for the Summit at Kemps Creek industrial development. That proposal formed part of the broader LOG North group of developments and sought approval for large-format warehousing and distribution land uses.

During the assessment of the earlier SSD, TfNSW raised concerns regarding the cumulative traffic generation and impacts associated with the LOG North developments, particularly given that access was proposed exclusively via Abbots Road and Darrabarra Avenue. To mitigate these impacts, the applicant proposed the construction of a portion of the future Southern Link Road. This road provided direct access to the site and established the northern access point to the Mamre Road Precinct.

As the Southern Link Road delivered precinct-wide transport benefits, TfNSW supported the former proposal, and the associated roadworks were secured through conditions of consent.

The current State Significant Development Application (**SSDA**) for a data centre diverges from the previously approved scheme by removing the Southern Link Road works. Instead, all site access is proposed via the recently constructed Mamre Road / Darrabarra Avenue signalised intersection.

TfNSW raises concerns about the efficiency and operational performance of this intersection under the revised access arrangement, as well as the mid-block capacity of Darrabarra Avenue. On this basis, TfNSW does not support the proposal in its current form. Advisory comments are provided in **TAB A** for the Department's consideration.

For more information regarding the above matter, please contact Nav Prasad, Land Use Planner via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Be Pegg".

Brendan Pegg
Senior Manager Land Use Assessment Central and Western
Transport Planning Branch
Planning, Integration and Passenger Division

TAB A - TfNSW advisory comments

Mode Share

Comment:

The traffic generation assessment has adopted a mode share assumption of 90% private vehicle use. TfNSW considers this assumption to be inappropriate given:

- The quantum of on-site parking proposed.
- The 24-hour operational nature of the development.
- The absence of access to public transport services within reasonable walking distance of the site.

In this context, TfNSW considers it unreasonable to assume any meaningful uptake of non-car travel modes.

Recommendation:

TfNSW recommends that a 100% private vehicle mode share be applied for the purposes of estimating traffic generation associated with the development.

Traffic Generation

Comment:

For the parking assessment, the traffic report applies the employee parking rate contained within the relevant Development Control Plan (**DCP**) of one space per two employees. On this basis, the proposal includes:

- 540 parking spaces allocated to the data centre component; and
- 79 parking spaces allocated to the Central Operating Support Hub (**COSH**).
- Based on the adopted parking rate, the provision of 540 spaces implies approximately 1,080 employees per shift associated with the data centre alone. This figure is inconsistent with the traffic report, which identifies a peak campus population of 115 staff over a 12-hour period.

Further inconsistencies arise given that the campus is proposed to operate on a three-shift system, comprising three 8-hour shifts, rather than two 12-hour shifts as implied elsewhere in the report.

The traffic report also assumes that only 36% of staff would arrive or depart in the hour before and after a shift changeover. TfNSW considers this assumption to be unrealistic and likely to substantially underestimate peak traffic generation. In practice, most staff are expected to arrive and depart within a concentrated period surrounding shift changes.

Summary of TfNSW position:

- TfNSW considers that 100% of staff should be assumed to arrive and depart within the peak hour before and after shift changeover.
- Traffic generation should therefore be derived using a first-principles approach, based on the actual number of employees per shift.
- The traffic modelling must be revised accordingly to accurately assess the operational performance of the Mamre Road / Darrabarra Avenue signalised intersection under peak conditions.

Concern is raised with respect to the proposed 8:00 am to 4:00 pm shift, which would overlap with both the AM and PM network peak periods, thereby amplifying the potential impacts on the surrounding road network.

Car Parking

Comment:

The parking benchmarking exercise presented in the traffic report is based on comparisons with other data centres that are significantly smaller in gross floor area (**GFA**) than the proposed development. In addition, the report does not clearly identify:

- The number of employees on site at each comparison facility; or
- The operational shift patterns applicable to those facilities.

Noting that the proposed parking provision is derived from employee numbers rather than GFA, TfNSW requires further information to substantiate the proposed parking quantum, including:

- The total number of employees associated with the development.
- The number of employees per shift; and
- Shift overlap arrangements, if any.

This information is necessary to determine whether the proposed parking provision is appropriate and aligned with the actual operational needs of the development.

With respect to the COSH, the traffic report states that:

- The facility is intended to primarily service the data centre campus; and
- Only 25% of customers are anticipated to be external visitors.

On this basis, TfNSW considers that no more than 25% of parking associated with the COSH should be allocated to external customers.

However, the plans identify 33 parking spaces allocated for “data centre customers”, despite these users already being on site.

Recommendation:

TfNSW seeks clarification on the following points:

- The rationale for allocating dedicated parking spaces for data centre customers who are already present on the campus; and
- Whether it is anticipated that data centre employees will be required to re-enter the road network or drive internally within the site to access the COSH.