

29 June 2026

Shaun Williams
Principal Planning Officer
Department of Planning, Housing and Infrastructure

Via: NSW Major Projects portal

**EPA Advice on Modification Report
Mod 2 Huntingwood Drive Data Centre – SSD-4158923-Mod-2**

Dear Shaun

I am writing in response to your request for advice from the NSW Environment Protection Authority (EPA) on the Modification Report for the proposed modification Mod 2 to the Huntingwood Drive Data Centre located at 51 Huntingwood Drive, Huntingwood.

The EPA has reviewed the following documents:

- *Modification Report* (version 1) – Willowtree Planning – 19 May 2026
- *Air Quality Impact Assessment Addendum* (version 1) – Northstar – 19 May 2026
- *Memorandum – Acoustic Review* (Revision 3) – PWNA – 12 May 2026
- *Resilience & Hazard SEPP* (Revision 2.5) – SLR – 24 May 2026
- *Fire Safety Report* – Lote Consulting – 28 April 2026

The EPA understands the proposed modification is for design changes to the approved 400MW data centre. It is noted the modification will involve:

- Maintaining the number of emergency back-up generators to 316 (2MW) as per the approved SSD,
- Maintaining the proposed diesel storage at 4,048kL (approx. 3,440t) as per approved the SSD,
- Reducing hybrid dry coolers from 172 to 144 but relocating these from rooftop to ground level.

Based on our review, the proposal will require an environment protection licence (EPL) under the *Protection of the Environment Operations Act 1997* (POEO Act) for Chemical (diesel) storage.

The EPA considers that the Modification Report does not provide the information required for us to complete our assessment. The EPA has the following advice:

Matters to be addressed prior to determination

The EPA notes the modification does not propose to increase the number of diesel generators or hybrid dry coolers. However, it is noted the predicted noise and air quality impacts are likely to increase as a result of the modification. In particular, noise impacts are predicted to increase by up to 15dB at industrial receivers.

On this basis, the EPA recommends that the Department of Planning, Housing and Infrastructure (DPHI) consider the matters listed below and detailed in **Appendix A** prior to determination.

1. Air quality

The EPA recommends DPHI consider requesting the air quality impact assessment (AQIA) to be amended to identify and consider all generator use outside of testing and emergency scenarios, particularly associated with scheduled maintenance of IT, substation or network infrastructure or any voltage disturbances, load shedding and grid firming. Consideration should be given the impact of these scenarios on proposed generator operating hours. The proposal should also consider selection of plant to ensure performance levels do not result in excessive or unnecessary impacts.

2. Noise

The EPA recommends DPHI consider requesting that the Acoustic Review be amended to include assessment and modelling of the modified emergency scenario, noting the significant increases predicted to industrial receivers as a result of the proposal. The proposal should also consider any likely impacts from maintenance or network scenarios. The proposal should include an assessment of feasible and reasonable mitigation measures where impacts exceeding the Project Noise Trigger Levels/consent noise limits are identified.

The EPA recommends this information be provided to ensure the proposal transparently presents the likely impacts from the modified development and ensure appropriate mitigation measures are implemented to address the potential for increased impacts from the modification.

Matters for consideration

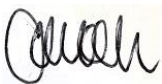
1. Waste Management

The EPA notes the Fire Safety Report and Resilience and Hazards SEPP report consider the risks associated with lithium-ion batteries and contaminated fire water.

As part of the preparation of the Fire Safety Study required by the consent, the EPA advises that specific consideration should be given the storage of waste lithium-ion batteries, particularly with regard to the maximum quantity to be stored on-site and fire management measures to be implemented to minimise the risk of thermal runaway.

If you have any further questions about this issue, please contact Carlos Ferguson at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely



CHRIS MARSH
A/Unit Head – Industry Assessments
NSW Environment Protection Authority

Appendix A – NSW Environment Protection Authority (EPA) detailed comments on Modification Report for proposed Mod 2 Huntingwood Drive Data Centre (SSD-4158923-Mod-2)

The EPA has the following advice:

Matters to be addressed prior to determination

1. Air Quality

The Modification Report and AQIA states the proposal will not increase the number of emergency back-up diesel generators or change the number of generators to be tested at one time. It is noted the AQIA includes revised modelling for operational (testing) and emergency scenarios and does not predict any additional exceedances of relevant impact assessment criteria. It is noted the AQIA identifies that predictions for short-term pollutants are higher than the approved SSD.

- **Consideration of all potential generator use**

The ensure that operational impacts are consistent with modelled scenarios and predictions in the AQIA, the EPA recommends that data centre proposals consider and clarify all potential uses of back-up generators.

This should include consideration of any generator use that may be required for voltage disturbances, IT maintenance, substation or network maintenance, load shedding and grid firming, and provide the number of generators required for those scenarios where applicable.

Should these scenarios exceed the assumptions for the testing scenario provided in AQIA, the EPA recommends the impacts from these scenarios be clearly described and modelled against the assessment criteria in the Approved Methods.

- **Calculating generator operating hours**

Any additional generator operation should also be considered with regard to calculating total generator operating hours, including allowance for unplanned operation of generators. The EPA also notes the AQIA does not specify whether any warm-up or cool-down periods are included in the calculation of total generating operating hours. The EPA considers that warm-up and cool down periods should be included in the calculation of total generator hours.

Where proposed generator use exceeds 200 hours, the proposal would need to comply with the NO_x limit of 450mg/Nm³ in the POEO Clean Air Regulation.

- **Generator selection**

It is noted the documentation refers to different options for generator selection. As this data centre will require a licence, the EPA is required to consider the pollution likely to be caused, the likely impact of that pollution and the practical measures that could be taken to prevent, control, abate or mitigate that pollution (section 45 of POEO). For data centres, the EPA considers minimum practical measures to include the selection of diesel generators that meet Tier 2 NO_x emission performance. While this will not result in compliance with criteria during an emergency scenario, it has the potential to significantly reduce NO₂ impacts.

The EPA recommends the proponent evaluate the generator emission performance and emission concentration against Best Available Technology (UK Emergency Generator BAT) and consider the installation of Tier 2 generators to ensure emissions and impacts are minimised.

Recommendation: The EPA recommends DPHI consider requesting the AQIA be updated to include consideration of potential air quality impacts from generator use associated with maintenance and network scenarios. This should include consideration of likelihood, frequency and number of generators that would be required and modelling of impacts where appropriate.

The AQIA should also:

- review the calculated generator hours with regard to any identified scheduled maintenance and network scenarios, including adequate allowance for unplanned generator use scenarios.
- Consider selection of generators that achieve a level of performance that avoids excessive and unnecessary adverse impacts on receptors.

2. Noise

The Acoustic Review includes revised modelling for operational and generator testing scenarios and predicts the modified proposal will comply with the existing noise limits specified in the development consent, which includes conditions requiring post-commissioning noise verification and reporting.

However, it is noted that the revised modelling predicts significantly increased noise impacts on industrial receivers compared to the original approval by up to 2dB at non-industrial (child-care) receivers and up to 15dB at industrial receivers.

The Acoustic Review does not appear to provide any assessment of increased impacts during emergency scenarios or impacts associated with generator use for scenarios such as IT, substation or network maintenance, voltage disturbances or load shedding and grid firming.

The EPA considers that the Acoustic Review should consider any changes to noise impacts associated with emergency and maintenance/network scenarios. Where impacts are predicted to exceed the Project Noise Trigger Levels or existing consent noise limits, the Acoustic Review should include a feasible and reasonable assessment of available mitigation measures, generally in accordance with Table 3.1 in the Noise Policy for Industry.

Recommendation: The EPA recommends DPHI consider requesting the Acoustic Review to be amended to include assessment of any changes resulting from the modification to potential noise impacts from emergency scenarios and any generator use associated maintenance and network scenarios.

Where predicted impacts exceed the PNTLs/consent noise limits, it is recommended the modification include a feasible and reasonable assessment of available mitigation measures.