



Our ref: DOC25/555478-2

21 July 2025

Shaun Williams
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure

Via: NSW Major Projects Planning portal

**EPA Advice on Submissions Report
43-61 Turner Road Data Centre – SSD-68013714**

Dear Shaun,

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Submissions Report for the proposed data centre at 43-61 Turner Road, Gregory Hills.

The EPA has reviewed the *Submissions Report* prepared by Arup Australia dated 2 July 2025.

The EPA understands the proposal is for construction and operation of:

- 53MW data centre,
- 27 back-up diesel generators,
- Storage of 650kL of diesel fuel.

Based on the information provided, the proposal 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 proponent is not an NSW public authority, nor does the proposal involve land regulated under the *Contaminated Land Management Act 1997*.

The EPA has reviewed the Submissions Report and notes it does not fully address matters identified in the EPA's previous submission on this project dated 1 April 2025 (ref DOC25/181709-2). The following comments are provided for consideration by the Department of Planning, Housing and Infrastructure (DPHI) as part of its assessment of the proposal.

Matters for consideration

a. Air quality

The Submissions Report provides a qualitative analysis that states that risk of cumulative impacts from industrial development, including an existing data centre (Amazon AWS) located on Bluett Street approx. 500m south-east of the subject site, was determined to be low based on the site's location and predominant weather conditions, relative to sensitive receptors.

NSW Environment Protection Authority

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However, the analysis does not consider the results (extent and magnitude of predicted ground level concentrations) in the Air Quality Impact Assessment (AQIA). The Submissions Report does not provide any additional dispersion modelling to demonstrate there are no predicted exceedances of assessment criteria at sensitive receptors. It is noted that the nearest Air Quality Monitoring Station (AQMS) used to determine background level concentrations is unlikely to capture emissions from the Amazon AWS data centre.

The EPA suggests the proposal consider including mitigation measures to reduce potential for cumulative impacts. This could include protocols in post approval management plans (such as an Operational Environmental Management Plan (OEMP)) for coordinating testing with other nearby data centres and limiting testing, and/or notifying receptors, during weather conditions where there is greater likelihood of cumulative impacts on receptors.

b. Noise

It is noted modelling of the emergency scenario is provided on page 44 of the Noise and Vibration Impact Assessment (NVIA). However, the Environmental Impact Statement (EIS) and NVIA do not appear to assess reasonable and feasible mitigations for potential impacts from the emergency scenario. The EPA advises that Table 3.1 in the Noise Policy for Industry provides guidance on undertaking a reasonable and feasible assessment.

The EPA suggests the proposal consider mitigation measures to address emergency scenario impacts, such as notification protocols for receivers that would potentially be subject to impacts exceeding the Project Noise Trigger Levels (PNTLs). This could be done as part of post approval plans such as an OEMP.

The EPA is willing to be consulted during the preparation of any draft conditions for the project, particularly regarding management of noise impacts.

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

Yours sincerely,



CHRISTIE JACKSON
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NSW Environment Protection Authority