



Scoping Report

Project Atlas

10 Roberts Road, Eastern Creek

Prepared for
Goodman Property Services (Aust.) Pty Ltd
November 2025

MECONE.COM.AU



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* This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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Executive Summary

Site Details	
Site Address	10 Roberts Road, Eastern Creek
Legal Description	Lot 553 DP 1110447
Total Site Area	Approximately 17.0 ha
Landowner	Goodman Property Services (Aust) Pty Ltd
Local Government Area	Blacktown City Council
Zoning	IN1 General Industrial
Proposal	
Description of Proposal	Development for a maximum 500 MVA data centre facility
Application Details	
Applicant	Goodman Property Services (Aust) Pty Ltd c/o Mecone Group
Address	Level 12, 179 Elizabeth Street Sydney NSW 2000
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1 Introduction

This Scoping Report has been prepared by Mecone Group Pty Ltd (**Mecone**) on behalf of Goodman Property Services (Aust) Pty Ltd (**Goodman**) to a request project specific Secretary's Environmental Assessment Requirement (**SEARs**) for the construction and ongoing operation of a data centre facility and associated Offsite Enabling Infrastructure (OEI) at 10 Roberts Road, Eastern Creek (**the site**).

The proposal is declared as State Significant Development (**SSD**) under Clause 25 of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)* with the data centre having a total power consumption of more than 15 megawatts.

Whilst the proposal is not development for the purposes of a chemical storage facility, the proposed storage of diesel fuel on site would exceed the thresholds for Designated Development (if it was not SSD) under Item 13, Schedule 3 of the *Environmental Planning and Assessment Regulation 2021 (EP&A Regs)*. Accordingly, this Scoping Report requests project specific SEARs for abundant caution, however it is recognised that industry specific SEARs requirements will remain largely applicable for the proposal.

This report provides a description of the site, overview of the proposed development and discussion of key planning issues to assist the Department of Planning, Housing and Industry (**DPHI**) with preparation of the project specific SEARs.

1.1 Project Description

1.1.1 Project Overview

This Scoping Report is submitted to the DPHI on behalf of Goodman for the proposed development of a 500MVA Data Centre at 10 Roberts Road, Eastern Creek.

Development consent will be sought under an SSDA for the following:

- Site preparation works including demolition, bulk excavation and removal of existing structures on the site, tree and vegetation clearing and bulk earthworks.
- Construction, fit-out and 24/7 operation of a Data Centre
- Offsite enabling infrastructure
- 2 x 3 level Data Centre Buildings
- Ancillary office, EOT and amenity
- Provision of required utilities including:
 - diesel storage tanks
 - water tanks
 - substations on site
- Vehicle access for 20m articulated vehicles (semi-trailers)
- Associated landscaping and site servicing
- Installation of site services and drainage infrastructure

1.1.2 Objectives

The objectives of the proposal are as follows:

- Deliver a modern data centre to respond to the growing market demands



- Leverage the site's strategically beneficial location to support the growth of high technology industries in Eastern Creek Business Park and across Greater Sydney
- Deliver critically needed data storage space in a high accessible and well-serviced location
- Appropriately mitigate potential environmental impacts arising from the development

1.2 Site Context

The site is a rectangular lot, known as 10 Roberts Road, Eastern Creek (circled green in Figure 1), with OEI connection to TransGrid Sydney West 330/132kV Substation & Switchyard at 22 DP1246626 Old Wallgrove Road, Eastern Creek (circled red in Figure 1).

The site is identified as part of the Eastern Creek Precinct Stage 3 within the Western Sydney Employment Area. It is located approximately 35km of the Sydney Central Business District (**CBD**) and 5.1 km from Rooty Hill Train Station.

The site has a site area of approximately 17 hectares and is bounded by industrial development and has a primary frontage of 400m to Roberts Road. The site contains an industrial warehouse and substantial existing hard-stand areas from the former Coles distribution centre operation.

Surrounding land uses in the vicinity include:

- **Northeast:** A range of mixed-use industry & commercial buildings, including a Coles CDC and Telstra NBN
- **Southeast:** CDC Data Centre and substation
- **South, southwest and west:** land primarily owned and operated by TransGrid Sydney
- **Northwest:** Commercial industry and the Industrial Harvest cafe

The site is zoned IN1 General Industrial within Chapter 2 Western Sydney Employment Area of *State environmental Planning Policy (Industry and Employment) 2021 (IESEPP)*. The proposal is permissible with development consent in the IN1 zone as per the *State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP)*.

A summary of key features for the site and surrounding context are also summarised in Table 1 below.



Figure 1 – Site Context (Green – Data Centre site, Red – Offsite Enabling Infrastructure)

Source: Mosaic

Table 1: Summary of Key Features

Item	Description
Address	10 Roberts Road, Eastern Creek
Legal Description	Lot 553 in DP 1110447
Local Government Area	Blacktown
Total Site Area	17 ha
Description of the site	<p>The site comprises a rectangular shaped allotment as seen in Figure 1 above. The primary frontage to the southeast, Roberts Road, comprises a length of 400m and provides both vehicular and pedestrian access to the site.</p> <p>The site is currently occupied by a vacant 2-storey distribution centre and hardstand areas with Cole's as the former tenant.</p>
Topography	The site is relatively flat with some degree of topographical variation along the borders of the site. There is steep embankment along the eastern and southern site border.
Surrounding development	Northeast: Directly to the northeast comprises of arrange of mixed-use industry and commercial buildings, including a Coles CDC and Telstra NBN.



	<p>Southeast: Development to the southeast includes the CDC Data Centre and a substation.</p> <p>South, southwest and west: Properties to the south, southwest and west are primarily owned and operated by TransGrid Sydney.</p> <p>Northwest: Development to the northwest includes a commercial industry and the Industrial Harvest café.</p>
Transport and access	<p>The site is approximately 5km from the Rooty Hill Train Station providing access to the T1 and T5 train line with direct access to the Sydney CBD and South West Sydney.</p> <p>Several bus stops are located along Roberts Road and Old Wallgrove Road which provides access to numerous locations including Liverpool, Mount Druitt and St Marys.</p> <p>The site is connected to Old Wallgrove Road via Roberts Road, which provide linkage to the Westlink M7 to the broader Greater Sydney.</p>
Aboriginal Heritage	<p>The site is not identified as containing any Aboriginal Heritage. The site is located 600m from Aboriginal Heritage sites.</p>
European Heritage	<p>The site is not identified as containing any European Heritage nor is within a heritage conservation zone. The site is located 750m from a local significant heritage item being the Southridge (Item no. 11).</p>
Flood Risk	<p>The site is identified to have low flood risk.</p>



1.3 Feasible Alternatives

Section 192 of the EP&A Regulation the Guidelines prepared by DPHI, requires an analysis of any feasible alternatives for SSDAs. Goodman considered numerous project alternatives for the proposed development.

Table 2 outlines three alternatives explored by Goodman being: Do Nothing, Alternative Location and Design, and Proposed Design.

Table 2: Project Alternatives

Options	Assessment
Alternative 1 – Do Nothing	<p>The ‘do nothing’ alternative was dismissed as the existing built form and operation on the site is not compatible with the requirements and objectives of this proposal. The existing building is largely underutilised and is currently vacant and could better serve as a location to deliver critical data centre infrastructure.</p>
Alternative 2 – Alternative Location	<p>The site meets the unique requirements for data centres, providing access to significant fibre connectivity, close to existing power utility infrastructure to delivery very low latency performance for data storage.</p> <p>Other locations were explored as part of the wider due diligence exercise were ruled out due to:</p> <ul style="list-style-type: none">• Unmanageable environmental and operational impacts, such as adjacent noxious users or improvements, and• Various site constraints and servicing difficulties, such as reduced access to critical HV infrastructure, sufficient water supply, fibre connectivity and redundancy.
Alternative 3 – Alternative Design	<p>Three design options were considered as part of a 6-week design exploration process, incorporating integrated input from engineers across mechanical, electrical, and fire safety systems.</p> <p>The alternative design options were however ultimately discounted ruled out due to the following:</p> <ul style="list-style-type: none">• Requiring new crossover and access arrangements (i.e. unable to optimise existing crossover and access currently on site).• Placement of MEP equipment along property boundaries was identified as a poor design outcome in mitigating impacts to sensitive receivers• Internally facing office areas resulted in poor surveillance outcomes for the street and provided little activation along street frontage.• Alternatives did not enable a suitable staging of the project.
The Proposal	<p>The proposed building design is identified as being most suitable for the site noting:</p> <ul style="list-style-type: none">• Utilises existing crossover and access arrangements,• Centralises the location of MEP and fuel storage areas within the site, to minimise potential impacts to sensitive receivers as much as practicable.• Office locations maximise surveillance and activation of street, and• The proposal will enable suitable staging of the project.



2 Strategic Context

2.1 Justification for the Project

The proposed data centre will play an important role in contributing to and facilitating significant growth of data connectivity services and technology in Blacktown LGA and across Greater Sydney. The alignments between the proposed development and State, District and Local Strategic Plans and Policies are detailed in **Table 3** below.

Table 3: Summary of Strategic Context

Document	Summary Overview
NSW State Infrastructure Strategy 2022-2042	<p>Strategic Direction</p> <p>The NSW State Infrastructure Strategy 2022-2042 (Infrastructure Strategy) provides a 20-year plan for the growth of infrastructure and technology across NSW. The Infrastructure Strategy has a specific lens on promoting technology, net zero greenhouse gas emissions and data in future infrastructure development, with data centres key to promoting this growth. There are a number of relevant key objectives and directions outlined in the Infrastructure Strategy:</p> <ul style="list-style-type: none"> • Ensure secure high-speed digital connectivity in key precincts • Prioritise the application and use of data and digital technology across all aspects of service delivery throughout the infrastructure asset lifecycle • Modernise legacy infrastructure and government systems, while retaining agility to avoid asset redundancy <p>Strategic Alignment</p> <p>The proposed data centre directly responds to the objectives and directions by contributing to investment in digital connectivity and transformation infrastructure in NSW. The site is located in Eastern Creek and is identified as part of the Eastern Creek Precinct Stage 3, which is one of the key industrial and employment precincts for Greater Western Sydney.</p> <p>With this strategically beneficial location, the proposed data centre will promote and support the application and use of data and digital technology, as well as enhancing a high-speed digital connectivity within the precinct and across NSW.</p>
Greater Sydney Region Plan: A Metropolis of Three Cities	<p>Strategic Direction</p> <p>The Greater Sydney Region Plan: A Metropolis of Three Cities (Region Plan) provides the overarching strategic plan for growth across Greater Sydney. The Region Plan provides a 20-year plan that seeks to address changing demographics and growth Greater Sydney, facilitating a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City.</p> <p>The Region Plan provides several key objectives to address liveability, sustainability, productivity, and infrastructure and collaboration in Greater Sydney.</p> <p>Eastern Creek is located within the Western Sydney Employment Area, which is envisaged to act as a long-term metropolitan land supply for industrial and employment activities. The Region Plan has established transport initiatives to improve the accessibility to the area to boost the existing freight and logistics activities. The Region Plan also sees the importance of infrastructure</p>



investments in the area to support commercial development, aerospace and defence industries and the innovation economy.

Strategic Alignment

The proposal specifically aligns with the following objectives:

- Objective 21 – Internationally competitive health, education research and innovation precincts
- Objective 23 – Industrial and urban services land is planned, retained and managed
- Objective 24 – Economic sectors are targeted for success

Eastern Creek is strategically planned to facilitate the growth of economic and industrial activities. The site is planned with well-established urban services, essential utility infrastructure and planned future infrastructure, making it an ideal location for critical infrastructure development.

The proposed data centre will facilitate economic investment across the LGA and Greater Sydney, while contributing to the capacity and investment to technological infrastructure to support a wider range of industrial and business activities in NSW, which aligns with the objectives of the Region Plan.

Strategic Direction

The Central City District Plan (**District Plan**) is a 20-year plan to manage growth in the context of economic, social and environmental matters, under the umbrella of the Greater Sydney Region Plan. The intent of the District Plan is to inform LSPS and LEPs, supporting the equitable growth and change across the eastern district.

The District Plan identifies Eastern Creek as one of the key industrial and urban services land supplies of the district, while also sees the importance to review the position of the area and potentially allow such area to transition from traditional industrial land to high-order employment activities to respond to the worldwide rapid technological changes.

Strategic Alignment

The proposal specifically aligns with the following priorities:

- Priority N10 – Growing investment, business opportunities and jobs in strategic centre
- Priority N11 – Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land
- Priority N12 – Support growth of targeted industry sectors

Eastern Creek is located within the Western Sydney Employment Area, where the District Plan has seen the importance of improving connectivity between the employment area and the Western Sydney Airport and Marsden Park Industrial Area to enhance business-to-business and supply chain connectivity along the industrial corridor.

With its strategically beneficial location, Eastern Creek has great potential to accommodate innovative and technology industries to support the existing industrial operation in the area while also encouraging the growth of innovation, new knowledge-intensive jobs, and business opportunities.

Realising the growing global demand for data storage facilities to accommodate innovative industries, the proposed data centre can effectively respond to this demand while also supporting the growth of targeted industry sectors, which aligns with the priorities of the District Plan.

Our Greater Sydney 2056
– Central City District Plan



Strategic Direction

The Blacktown Local Strategic Planning Statement 2020 (**LSPS**) sets out the strategic visions for land use planning in the Bayside LGA. these directions cross a number of the four themes of infrastructure and Collaboration, Liveability, Productivity and Sustainability. The LSPS realises the global trend of shifting from traditional industrial to advanced manufacturing and innovation industries, and the importance to allow and promote knowledge-intensive and advanced manufacturing activities across the LGA.

Strategic Alignment

The proposal specifically aligns with the following priorities:

- Priority 8 – Growing mixed use, investment, business and job opportunities in Strategic Centres
- Priority 9 – Maximising opportunities to attract advanced manufacturing to, and innovation in, industrial and urban services land
- Priority 10 – Growing targeted industry sectors

The proposed data centre will not only respond to the global shift toward high-technology and knowledge-based industries but also enhance the technological infrastructure and capacity to support a wider range of industrial and business activities within the LGA and across NSW.

The site is identified within the Western Sydney Employment Area, a major employment and industrial area providing jobs in Western Sydney. Understanding this area is envisaged to provide jobs and significant investment opportunities for large national and global companies, the proposed data centre will support innovative activities and provide technological capabilities to facilitate the investment and business growth across the employment area, which aligns with the priorities of the LSPS.

Blacktown Local Strategic
Planning Statement 2020



2.2 Cumulative Impacts with Future Projects

At the time of preparing this Scoping Report, there are several development proposals in the surrounding that need to be considered from a cumulative impact's perspective. Table 4 below provides a summary of relevant projects in the proximity which have been assessed for their cumulative impacts.

Table 4: Summary of Development in the Surrounding Area

DA Reference	Address	Description	Status
SSD-47320208	10 Eastern Creek Drive, Eastern Creek	Project Echidna Data Centre Eastern Creek The Construction and Operation of a Data Centre with an operational capacity of 35MW including data hall fitout, associated emergency back-up generators and cooling plant, office space, equipment rooms and car parking.	Determined Under Construction
SSD-10330-Mod-1	17 Roberts Road, Eastern Creek	Roberts Road Data Centre Additional storey to buildings 5 and 6, including internal layout reconfiguration	Determined
SSD-10330-Mod-2		Modification application for Additional back-up generators and diesel storage.	Under Assessment
SSD-37486043	2 - 10 OLD Wallgrove Road Horsley Park NSW 2175	Oakdale East Industrial Estate 5 Stage, 77ha Industrial estate.	Determined Under construction Precinct 2 SSDA – Under Assessment
SSD-63741210	16 Johnston Crescent, Horsley Park	NEXTDC S4 Data Centre Horsley Park Construction and operation of a data centre comprising of six data centre buildings with a maximum height of 38 m and an operational capacity of 250 MW, including substation, earthworks, car parking, landscaping and ancillary works.	Under Assessment
SSD-5248	813 Wallgrove Road Horsley Park NSW 2175	Gazcorp Industrial Estate 16 Warehouse Industrial Estate	Determined Modification 7 - Revisions to Lot Layouts, Estate Roads and Stage 1 Earthworks – Under Assessment
SSD-71144719	3 Johnston Crescent Horsley Park NSW 2175	Horsley Logistics Park Stage 2 Construction of two warehouse buildings and ancillary office space with a total gross floor area of 55,944 sqm, access	Exhibition



		driveways, hardstand areas and loading docks, car parking, landscaping, earthworks.	
SSD-8209	1-3 Millner Avenue Horsley Park NSW 2175	Costco Warehouse Facility 35,756m ² warehouse and distribution centre.	Determined

In discussions with TransGrid, Goodman is aware of the increased demand for electrical load connections at 330kV to Sydney West substation. Goodman are working with TransGrid in finalising the electrical design to secure the electricity supply for the site (refer to Section 3 for further discussion).



3 The Proposal

This section of the Scoping Report provides a summary of the proposed development, highlighting the key numeric parameters of the development and its operation.

3.1 Project Overview

The proposal comprises site preparation works, construction, fit out and 24/7 operation of 2x 3 level data centre buildings, provision of required plant and utilities, vehicular and pedestrian access, associated landscaping and site servicing, with further detailed description of works provided in the headings below.

The key parameters of the proposed development are summarised in Table 5 below.

Table 5: Proposal Key Features

Parameter	Proposal
Site area	143,974m ² inclusive of Substation area
Demolition	The proposal comprises the demolition of existing warehouse buildings, including existing hardstand and tree removal.
Proposed Land use	Data Centre with ancillary office space and substation
Site Max Demand	500MVA
Gross Floor Area (GFA)	99,310m ² (including 2,665m ² for ancillary office)
Floor Space Ratio (FSR)	0.7:1
Building Height	Building 1: approx. 24m Building 2: approx. 37m
Car Parking	Approximately 170
Landscape Area	Approximately 27,800m ² (Deep soil areas still to be confirmed)
Timing & Staging	Stage 1: Building 1 Stage 2: Building 2
Estimated Development Cost	\$5Bn AUD
Employment Generation	Construction 2,323 full-time equivalent jobs Operational 162 full-time equivalent jobs

3.2 Demolition and Site Preparation Works

Demolition of the existing buildings, hardstand structures and select tree removal on site will be required to accommodate the future proposal. Where possible, some areas of existing hard stand in serviceable condition may be retained for the future project (subject to further design review), along with existing trees surrounding the boundary of the site.

Site preparation works will be inclusive of installing site services and bulk earthworks, including cut and fill.

3.3 Data Centre Layout and Design

The proposal includes the construction and 24/7 operation of a 500MVA data centre facility.

The proposal comprises two (2) buildings, known as Building 1 and 2, which consist of 3 and 4 floor levels respectively, consisting of data halls, ancillary office, plant and generator gantries across the two buildings. Building 1 has an overall building height of approx. 24m, whilst Building 2 has a building height of approx. 32.4m.

As illustrated in Figure 2, the general arrangement and layout of the proposal consists of:

- Two data centre buildings positioned and setback along the eastern and western site boundaries, with a ring road buffer around the site, with generator gantries internally facing and ancillary office orientated towards side boundaries.
- Fuel and water storage located centrally within the site.
- Substation within the northern corner of the site.



Figure 2 – Site Plan
Source: Grimshaw

3.4 Offsite Enabling Infrastructure

OEI from the TransGrid Sydney West 330/132kV Substation & Switchyard, immediately to the west of the site, is required to facilitate the future data centre development and connect to on-site substation located in the northern corner of the site.

As discussed with DPHI, the design for this connection is subject to ongoing design development with TransGrid, to be confirmed prior to submission of the SSDA. Preliminary planning and route options for the future offsite enabling infrastructure is provided in **Figure 3**, however, the design is subject to change dependant on authority advice. (refer to Section 6 for further discussion).

Additionally, discussions with Sydney Water have occurred regarding service availability and future connection to Sydney water infrastructure and recycled water infrastructure.

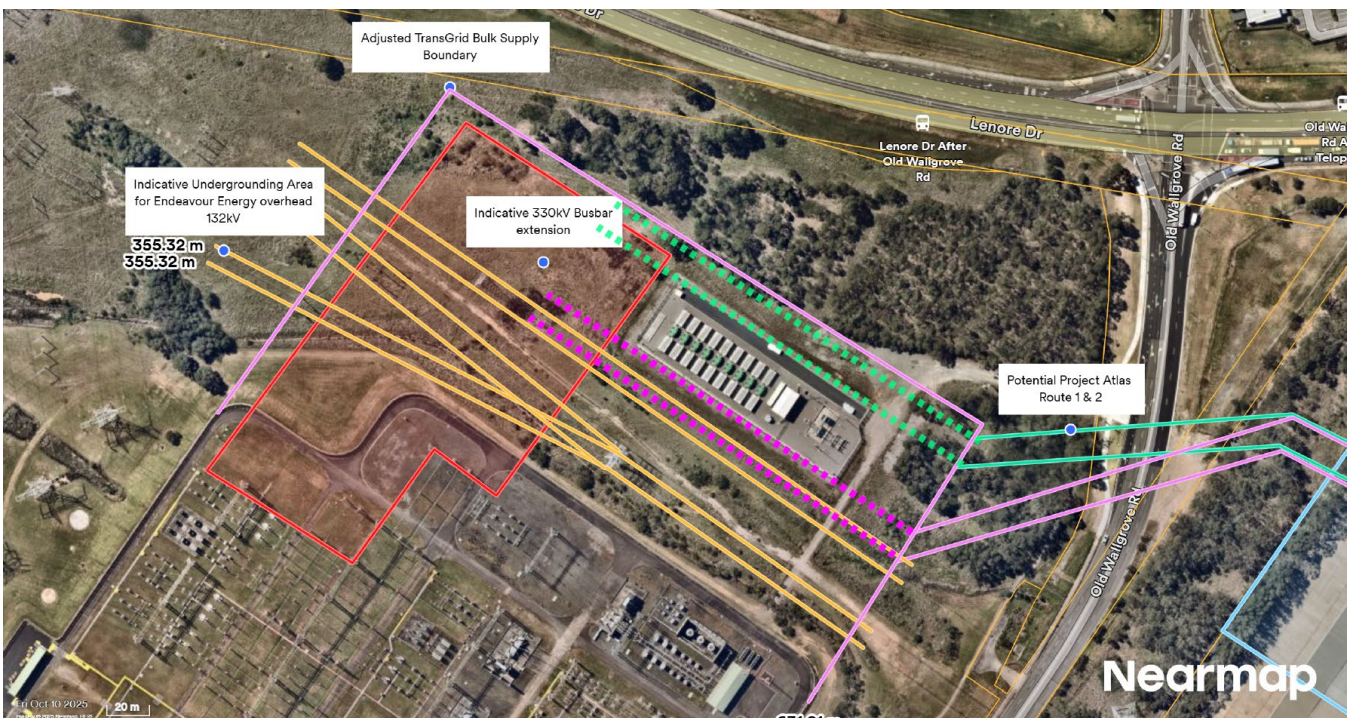


Figure 3 – Preliminary Electrical OEI options
Source: TransGrid

3.5 Back up Power System

The data centre is a mission critical facility and therefore requires back up emergency power generation. The site is designed for a total of 246 low voltage generators rated to supply the data centre critical loads, admin load and life safety loads. All generators are containerised and located externally on a generator gantry, positioned centrally within the site.

Bulk Fuel Storage and Delivery System are located centrally within the site between Buildings 1 and 2. It is estimated that the diesel storage required for the proposal will be approx. 3,440kL or 3,000 tonnes.

3.6 Traffic Access and Parking

Vehicular access has been designed to accommodate Heavy Rigid Vehicles and Semi-trailer rigid vehicles as well as cranes for construction, maintenance and operational needs. The proposal will maintain existing vehicular entry to the site from Roberts Road, with the inclusion of necessary security



improvements. A dedicated access road for the substation will also be provided to the north of the site from Roberts Road to service the substation.

Internal circulator access includes ring road access, with multiple loading bays and entries for each building.

Allowance has been made for approximately 170 car spaces, positioned along the north and southern boundaries of Building and western boundary of Building 2. Building occupation studies will be conducted to firm up the car parking spaces.

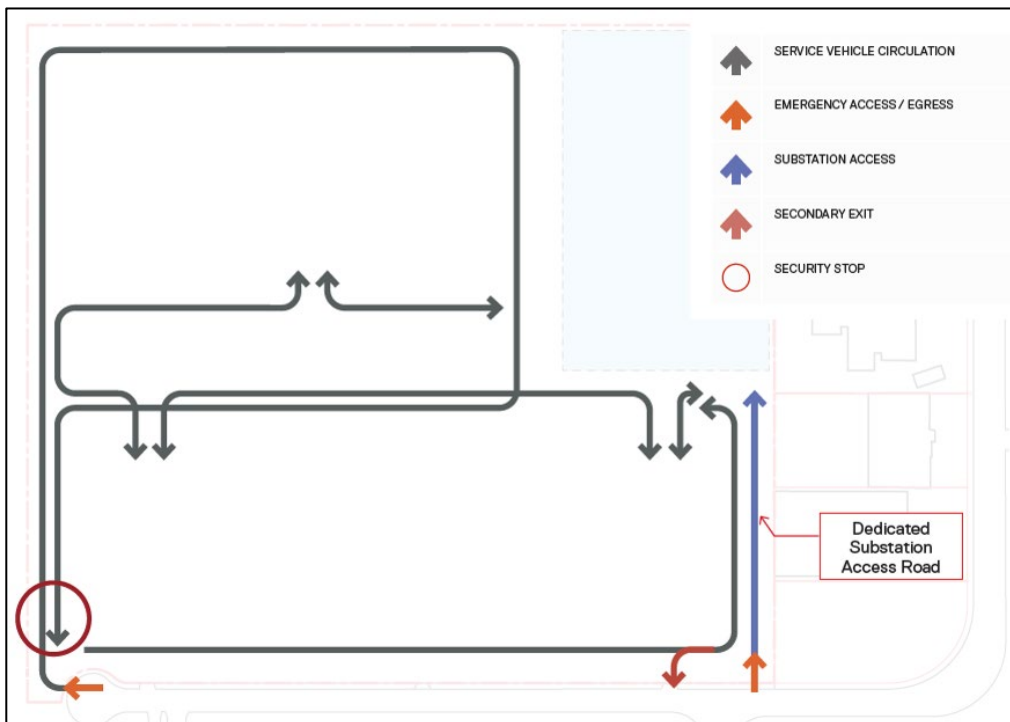


Figure 4 – Site Access

Source: Grimshaw

3.7 Landscaping

Landscape design is currently being prepared by Arcadia in support of the proposal with current landscape areas equalling approx. 27,800m² (19% of site area)

Landscape design will aim to prioritise the retention of existing trees and support additional tree planting and landscaping along the boundary of the site.



4 Statutory Context

This section provides an overview of key statutory requirements relevant to the site and proposal, including:

- **Commonwealth Planning Context**
 - *Environment Protection and Biodiversity Conservation Act 1999*
- **State Planning Context**
 - *Protection of the Environment Operations Act 1997*
 - *Protection of the Environment Operations (Clean Air) Regulation 2022*
 - *Water Management Act 2000*
 - *Biodiversity Conservation Act 2016*
 - *Environmental Planning and Assessment Act 1979*
 - *Environmental Planning and Assessment Regulation 2021*
 - *State Environmental Planning Policy (Industry and Employment) 2021*
 - *State Environmental Planning Policy (Sustainable Buildings) 2022*
 - *State Environmental Planning Policy (Resilience and Hazards) 2021*
 - *State Environmental Planning Policy (Planning Systems) 2021*
 - *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- **Local Planning Context**
 - *Blacktown Development Control Plan – Eastern Creek Precinct Stage 3*

4.1 Key Statutory Requirements

4.1.1 Power to Grant Approval

Table 6: Power to Grant Approval

Statutory Reference	Pathway Description
EP&A Act Section 4.12(8)	The EP&A Act establishes the assessment framework for SSD. Section 4.12(8) requires that Development Applications for SSD be accompanied by an EIS. Matters relevant to the preparation of an EIS (including the application for SEARs) are set out under the EP&A Regulation.
EP&A Act Section 4.5(a)	Pursuant to Section 4.5(a) of the EP&A Act the Minister is the consent authority for SSD, or the Minister's Delegate.
Planning Systems SEPP Schedule 2 Clause 3	Pursuant to Schedule 1, Clause 25 of the Planning Systems SEPP, the proposed development has a total power consumption of more than 15 megawatts. Accordingly, the proposal is SSD.



4.1.2 Permissibility

Table 7: Permissibility

Statutory Reference	Control
Transport and Infrastructure SEPP 2021	The site is zoned IN1 General Industrial under Chapter 2 of the <i>State Environmental Planning Policy (Industry and Employment) 2021</i> (IESEPP) The proposed development constitutes a 'data centre'. Development for the purpose of data centres may be carried out with consent on land in this zone as per Clause 2.31 of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (TISEPP).

4.2 Environment Protection and Biodiversity Conservation Act 1999

Under the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act 1999**), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (**MNES**) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment.

The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a 'Controlled Action' for which formal Commonwealth approval is required.

Preliminary biodiversity surveys have identified that land between the site and the TransGrid Sydney West 330/132kV Substation & Switchyard consists of Critically Endangered Ecological Communities (**CEEC**). The design of the OEI connection to the TransGrid facility is currently ongoing with an aim to avoid and/or minimise impacts to the CEEC.

Should impacts to the CEEC be unavoidable for the proposal, referral to the Federal Department of the Environment would be required to determine if it constitutes a controlled action in accordance with the NSW Assessment Bilateral Agreement.

4.3 Protection of the Environment Operations Act 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (**POEO Act**) contains a core list of 'scheduled activities' that require a licence before they may be undertaken or carried out.

Under the POEO Act 1997, 'activity' is defined as:

"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."

Schedule 1, Part 1 of the POEO Act lists out scheduled activities for which an Environmental Protection Licence (**EPL**) is required for the premises at which it is carried out. The following scheduled activities of relevance to the proposed development are provided below:



- Schedule 1, Part 1, Clause 9 'Chemical Storage' lists petroleum products storage as a scheduled activity, if the proposal includes the “*capacity to store more than 200 tonnes (liquefied gases) or 2,000 tonnes (chemicals in any other form)*”.
- Schedule 1, Part 1, Clause 17 applies to metropolitan electricity works (internal combustion engines). However, Clause 17(1A) notes that this clause does not apply to the generation of electricity by means of electricity plan that is emergency stand-by plan operating for less than 200 hours per year.

The proposal will include petroleum products of approx. 3,000 tonnes (non-liquified gas). Additionally, the proposed back-up generators will be operated for more than 200 hours per annum. The activity is therefore considered a scheduled activity under the POEO Act and will therefore require an EPL from the NSW Environment Protection Authority.

4.4 Protection of the Environment Operations (Clean Air) Regulation 2022

Under Section 73 of the POEO (Clean Air) Regulation, “Emergency standby plant is exempt from the air impurities standard for nitrogen dioxide and nitric oxide specified in Schedule 2, Part 2, Division 3 for the plant if -

- a) the plant comprises a stationary reciprocating internal combustion engine for generating electricity, and*
- b) it is used for a total of not more than 200 hours per year.*

As stated above, the proposed back-up generators we be required to operate more than 200 hours per annum. As such, the proposal will need to consider the air impurity standards for NO₂ and NO specified in the Regulation.

4.5 Designated Development

In accordance with item 13, Schedule 3 of the EP&A Regs, development for the purposes of a Chemical storage facilities is designated development if the facility:

- (a) stores or packages chemical substances in containers, bulk storage facilities, stockpiles or dumps, and*
- (b) has a total storage capacity of more than—*
 - (i) 20 tonnes of pressurised gas, or*
 - (ii) 200 tonnes of liquefied gases, or*
 - (iii) 2,000 tonnes of chemical substances.*

Or is located:

- (a) within 40 metres of a natural waterbody, or*
- (b) within 100 metres of a wetland, or*
- (c) in an area of high watertable or highly permeable soil, or*
- (d) in a drinking water catchment, or*
- (e) on a floodplain.*

Whilst diesel storage for the proposal exceeds the storage thresholds for chemical substances (2,000 tonnes), the proposal is for the purposes of a data centre and not a chemical storage facility to which this provision applies to.



Furthermore, Section 4.10(2) of the EP&A Act stipulates that: designated development does not include State significant development despite any such declaration.

As such, the proposed development is not designated development.

4.6 Pre-Conditions

Table 8 outlines the pre-conditions to exercising the power to grant consent which are relevant to the project and the section where these matters are addressed within the Scoping Report. These are conditions that must be satisfied before the approval authority may grant development consent.

Table 8: Pre-conditions

Statutory Reference	Pre-condition	Relevance
Industry and Employment SEPP	<p>Provisions relating to Western Sydney Employment Area are provided within Chapter 2 of the IESEPP.</p> <p>The site is located within Precinct 2 (Eastern Creek). As such, provisions within Chapter 2 of the IESEPP are applicable to the site.</p>	<p>The proposal has been designed with consideration of the provisions within Chapter 2 of the IESEPP, inclusive of the Development Control Plan for the Eastern Creek Precinct.</p>
Resilience and Hazards SEPP	<p>A consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.</p> <p>Section 4.6 of the SEPP provides a State-wide approach to the remediation of contaminated land. It requires a consent authority to assess the potential for land to be contaminated and the works required to remediate the land to ensure it is suitable for its intended use.</p> <p>Chapter 3 outlines a minimum level of assessment is applied to hazardous and offensive industries and their potential impacts.</p>	<p>A Preliminary Site Investigation is currently being undertaken for the site understand the underlying contamination and potential remediation strategies on the site.</p> <p>The EIS will outline how the site is able to be made suitable for the proposed use with the support of a relevant consultant and auditor advice.</p>
Transport and Infrastructure SEPP	<p>Part 2.3, Division 5</p> <p>2.48 Determination of development applications – other development (development likely to affect an electricity transmission or distribution network)</p> <p>(1) This section applies to a development application (or an application for modification of a consent) for development comprising or involving any of the following—</p> <p>(a) the penetration of ground within 2m of an underground electricity power line or an electricity distribution pole or within 10m of any part of an electricity tower,</p>	<p>The proposed works will involve construction adjacent to an existing substation located to the west of the site.</p> <p>Works will also be within proximity to overhead electricity power lines. Therefore, referral will be made to the electricity supply authority (TransGrid) for the area in which the development is to be carried out.</p>



	<p>(b) development carried out—</p> <ul style="list-style-type: none">(i) within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists), or(ii) immediately adjacent to an electricity substation, or(iii) within 5m of an exposed overhead electricity power line, <p>(c) installation of a swimming pool any part of which is—</p> <ul style="list-style-type: none">(i) within 30m of a structure supporting an overhead electricity transmission line, measured horizontally from the top of the pool to the bottom of the structure at ground level, or(ii) within 5m of an overhead electricity power line, measured vertically upwards from the top of the pool, <p>(d) development involving or requiring the placement of power lines underground, unless an agreement with respect to the placement underground of power lines is in force between the electricity supply authority and the council for the land concerned.</p> <p>(2) Before determining a development application (or an application for modification of a consent) for development to which this section applies, the consent authority must—</p> <p>(a) give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting comments about potential safety risks, and take into consideration any response to the notice that is received within 21 days after the notice is given.</p>	
	<p>Part 2.3, Division 17</p> <p>2.119 Development with frontage to classified road</p> <p>The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that—</p> <ul style="list-style-type: none">(b) where practicable and safe, vehicular access to the land is provided by a road other than the classified road, and(c) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of—	<p>The site has a frontage to Roberts Road, which is a classified road. The proposal must therefore demonstrate to consent authority that it is capable of complying with Clause 2.119 of the TISEPP.</p>



	<ul style="list-style-type: none"> (i) the design of the vehicular access to the land, or (ii) the emission of smoke or dust from the development, or (iii) the nature, volume or frequency of vehicles using the classified road to gain access to the land, and <p>(d) (c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.</p>	
	<p>Part 2.3, Division 17</p> <p>2.122 Development with frontage to classified road, and</p> <p>Schedule 3 Traffic Generating Development</p> <p>A public authority, or person acting on behalf of a public authority, must not approve traffic-generating development without written notice of the intention to carry out the development to Transport for NSW (TfNSW) in relation to the development, and taken into consideration any response to the notice that is received from TfNSW within 21 days after the notice is given.</p>	<p>Development for the purpose of industry is considered traffic generating development if the site area is or gross floor area exceed 20,000m².</p> <p>The site has a site area of 17 ha and GFA of approx. 99,000m², which is greater than 20,000m² in site area.</p> <p>It is therefore considered traffic generating under the TISEPP and will be required referral to TfNSW.</p>

4.7 Mandatory Considerations

Below outlines the mandatory considerations which are relevant to the proposal:

Table 9: Mandatory Considerations

Statutory Reference	Mandatory Consideration
Consideration under the EP&A Act and Regulation	
Section 1.3	Relevant objectives of the EP&A Act
Section 4.15	<p>In determining an application, a consent authority is to take into consideration such matters that are of relevance to the development subject of the application, as stipulated in Section 4.15, including:</p> <ul style="list-style-type: none"> • Relevant environmental planning instruments, • Relevant draft environmental planning instruments, • Relevant planning agreement or draft planning agreement, • Development control plans, • The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality, • The suitability of the site for the development,



	<ul style="list-style-type: none"> The public interest.
Section 4.38	Section 4.38 contains the provisions for determining an SSD
Mandatory relevant consideration under EPIs	
Transport and Infrastructure SEPP	<p>Section 2.119 – Development with frontage to classified road</p> <p>Section 2.122 – Traffic-generating development</p>
Sustainable Buildings SEPP	<p>Section 3.2 – Development consent for non-residential development</p> <p>Section 3.3 – Other considerations for large commercial development</p>
Biodiversity and Conservation SEPP	Part 2.2 – Clearing of vegetation in non-rural areas.
Industry and Employment SEPP	<p>Objectives and land use for the IN1 Zone</p> <p>Part 2.3 – Development Standards</p> <p>Part 2.4 – Principal Development Standards</p> <p>Part 2.5 – Miscellaneous Provisions</p>
Resilience and Hazards SEPP	Section 4.6 – Contamination and remediation to be considered in determining development application
Consideration under other legislation	
Biodiversity Conservation Act 2016 Section 7.9	<p>Section 7.9 of the BC Act 2016 requires preparation of a biodiversity development assessment for SSD that is assessed under Part 4 of the EP&A Act. The SSDA will be assessed under Part 4 of the EP&A Act, and, therefore, would normally be required to include a biodiversity development assessment report. However, section 7.9(2) of the BC Act 2016 allows for exemption from the requirement where the development is not likely to have any significant impact on biodiversity values. A request for a waiver for submission of a Biodiversity Development Assessment Report (BDAR).</p> <p>As commented above, the early investigations for the off-site enabling infrastructure have identified CEEC between the site and TransGrid Sydney West 330/132kV Substation & Switchyard.</p> <p>Design for OEI is ongoing and will ensure impacts are avoided and/or minimised as much as practicable with impacts to be assessed as part of the BDAR for the overall development.</p>
National Parks and Wildlife Act 1974	<p>The Act provides relevant guidelines to investigate and assess the nature, location and spatial extent of any potential Aboriginal cultural heritage resources within the area, investigate if the proposed development would harm those resources and provide recommendations for management options.</p> <p>An Aboriginal Cultural Heritage Report (ACHAR) is currently under preparation to assess and report on potential impacts to Aboriginal objects and places from a proposed activity. This will be finalised prior to lodgement of the SSDA.</p>



Development Control Plans

Eastern Creek Precinct Plan – Stage 3	<p>Clause 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.</p> <p>As such, there is no requirement for assessment of the proposal against the Eastern Creek Precinct Plan – Stage 3 for this SSDA.</p> <p>Notwithstanding, the proposed Data Centre has been designed with consideration of the relevant controls applicable to the site and is generally compliant.</p>
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Development Contribution Plans

Blacktown Section 7.11 Contribution Plan No.18 – Eastern Creek Stage 3	<p>The <i>Blacktown Section 7.11 Contribution Plan No.18 – Eastern Creek Stage 3</i> is applicable to the site.</p> <p>The contribution formulae will be applied to the future Estimated Development Cost at the time of lodgement.</p>
Housing and Productivity Contribution (HPC)	<p>A HPC will be payable, in accordance with the <i>Environmental Planning and Assessment (Housing and Productivity Contributions) Order 2024</i> – calculated in respect of the detailed SSD scheme.</p>

5 Engagement

Early engagement with Sydney Water and TransGrid has occurred to confirm the water and electricity serviceability for the site. Engagement with these agencies is ongoing and subject to further options testing regarding the design for OEI connection.

A preliminary scoping meeting with DPHI was also held on 17 November 2025 via online Teams meeting to introduce the project and seek initial feedback and inform this scoping report.

Further engagement with Government agencies and relevant stakeholders prior to the lodgement of the EIS are to include:

- Department of Planning, Housing and Infrastructure (if further consultation is required)
- Blacktown City Council
- NSW Environment Protection Authority
- Transport for NSW
- Sydney Water (ongoing)
- TransGrid (ongoing)
- Surrounding landowners.



6 Proposed Assessment of Impacts

6.1 Biodiversity

A Biodiversity Development Assessment Report (**BDAR**) is under preparation in support of the proposed development in accordance with *Biodiversity Conservation Act 2016* and *the Biodiversity Assessment Method 2020*.

An ecological survey of the site and neighbouring TransGrid site is currently being completed, with preliminary ecological surveys have identified potential CEEC vegetation of National Environmental Significance within the TransGrid site.

The design for OEI is currently ongoing in discussions with TransGrid, with preliminary OEI connections to be refined to avoid and/or minimise impacts to existing native vegetation.

6.2 Hazards and Risks

As noted in Section 4, due to the storage of petroleum products of approx. 3,000 tonnes (non-liquified gas), and proposed back-up generators operating for more than 200 hours per annum, and EPL is required for the project.

Feedback from NSW EPA as part of the scoping meeting will be required to confirm requirements for EIS submission in addition to Industry specific SEARs requirements for the proposal.

A preliminary risk screening will be completed in accordance with *State Environmental Planning Policy (Resilience and Hazards) 2021* and Applying SEPP 33 Guidelines (DoP, 2011), that includes a clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials associated with the development will be prepared for the proposal.

Additionally, a Preliminary Hazard Analysis (**PHA**) will be prepared in accordance with the Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011), should the preliminary risk screening indicate that the project is “potentially hazardous”.

Relevant aspects of the FM Global Property Loss Prevention Data Sheet 5-32 – Data Centres and Related Facilities will also be considered and implemented where appropriate as part of the development.

6.3 Infrastructure Servicing

Electricity - TransGrid

OEI from the TransGrid Sydney West 330/132kV Substation & Switchyard, immediately to the west of the site, is required to facilitate the future data centre development and connect to on-site substation located in the northern corner of the site. Current planning for the proposal includes 330kV Busbar extension of existing Switchyard and undergrounding of some 132kV overhead powerlines as well as a new high voltage connection to the site.

Goodman are working with TransGrid to finalise the electrical design to supply for the site.

Water – Sydney Water



An application to Sydney Water was submitted by Goodman in March 2025 with a feasibility letter issued in June 2025. Sydney Water have advised that ongoing consultation and an options assessment will need to be undertaken to determine the servicing strategy for the site.

Ongoing consultation with Sydney Water is occurring.

6.4 Ecologically Sustainable Development

Early consideration of ESD design principles and strategies have been considered since the projects early design development.

An ESD report consistent with the Industry Specific SEARs for Data Storage Centres, will be prepared as part of the future SSDA lodgement.

6.5 Acoustic

A due diligence noise assessment has been completed by Renzo Tonin & Associates to support the design development of the proposal.

Figure 5 shows the location of the proposal, as well as nearby noise sensitive receivers and the land use near the proposal. Existing ambient and background noise levels were monitored by Renzo Tonin & Associates during May/June 2025 within the three residential areas of Minchinbury, Horsley Park and Erskine Park to determine existing background noise levels.

Preliminary noise modelling results have determined that noise emissions from normal site operations and maintenance testing scenarios are able to comply if mitigation strategies are applied. This will be resolved during further design development.



Figure 5 – Sensitive Receivers
 Source: Renzo Tonn & Associates

6.6 Other Impacts

Table 10 provides an overview of the relevant matters and environmental impacts which are to be addressed by the future EIS.

Table 10: Assessment of Impacts



Matter for Consideration	Commentary	Further assessment in EIS
Aboriginal Heritage	An ACHAR report is currently being prepared in support of the proposal in accordance with the Industry Specific SEARs. This is due to be completed in January 2026.	Standard - As per Industry Specific SEARs
Air quality	An Air quality report is currently being prepared in support of the proposal in accordance with the Industry Specific SEARs.	Standard - As per Industry Specific SEARs
Built Environment and Visual Impact	<p>The site is located within the Western Sydney Employment, characterised by large industrial buildings. The site is not in close proximity to any sensitive visual receivers.</p> <p>The proposed built form and scale is consistent with the existing character and is considered to result in any adverse visual impacts.</p>	Standard - As per Industry Specific SEARs
Contamination	A Preliminary Site Investigation is currently being undertaken for the site to understand any potential contamination and remediation strategies. The EIS will outline how the site is able to be made suitable for the proposed use with the support of a relevant consultant and auditor advice.	Standard - As per Industry Specific SEARs
Landscaping	<p>Arcadia have been engaged by Goodman to prepare a landscape design report to support of the proposal.</p> <p>The landscape design aims to provide additional tree planting largely consisting of endemic native species along the boundary of the site.</p>	Standard - As per Industry Specific SEARs
Social	The assessment in the EIS will provide a Social Impact Assessment which considers social and economic matters and benefits of the proposal. It will be prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i> .	Standard - As per Industry Specific SEARs
Stormwater	<p>In accordance with the Blacktown City Council's Eastern Creek Precinct Plan, Part J of Council's Development Control Plan, and council's advice, no OSD is required for the site.</p> <p>Water sensitive urban design is required for the site in order to meet the following pollutant reduction targets:</p> <ul style="list-style-type: none"> - Gross Pollutants: 90% - Total Suspended Solids: 85% - Total Phosphorus: 65% - Total Nitrogen: 45% - Total Hydrocarbons: 90% <p>The following water treatment devices may be implemented on site to meet council's requirements:</p> <ul style="list-style-type: none"> - Jellyfish Filters 	Standard - As per Industry Specific SEARs



	<ul style="list-style-type: none">- Oceanguard Filter Baskets- ZPG Stormfilter Cartridges	
Traffic and Parking	A Traffic, Parking and Accessibility report will be prepared to detail assessment of these matters.	Standard - As per Industry Specific SEARs
Waste	The proposal is capable of satisfying the required waste requirements in accordance with Council's DCP.	Standard - As per Industry Specific SEARs
No further assessment required		
Bushfire	The site is not Bushfire prone land	NA
Flood	The site is not identified as flood affected in Council's flood maps. As such, the site is not identified as flood prone land.	NA
Non-Aboriginal Heritage	The site is not identified as non-aboriginal heritage, nor is in proximity of world or national heritage sites. Impacts to nearby heritage items is considered negligible.	NA

7 Additional items for Discussion

This section sets out additional items which may warrant further discussion with DPPI prior to the issue of SEARs:

- Options and consultation for lead in Water and Electricity infrastructure.
- Confirmation of reporting and lodgement requirements for SSDA in addition to Industry Specific SEARs from Government Agencies – TransGrid, Sydney Water, NSW EPA
- Assistance from DPPI and Investment Delivery Authority (IDA) to coordinate and navigate infrastructure servicing requirements with Government Agencies in a timely fashion.
- Staging of the Proposal.
- Contributions payable for the project.



8 Conclusion

This Scoping Report has been prepared to a request project specific SEARs for a future 500MVA data centre development at the site and OEI connection to TransGrid Sydney West 330/132kV Substation & Switchyard.

The proposal optimises a currently underutilised brownfield site, strategically located within the Western Sydney Employment Area. The site is well suited for Data Centre use noting the site's:

- proximity and accessible location to existing High Voltage and water infrastructure.
- location within an established AZ precinct with other established and emerging Data Centres,
- distance from sensitive land use zones and receivers.

Noting the proposal's requirement to store petroleum products of approx. 3,000 tonnes (non-liquified gas), and proposed back-up generators operating for more than 200 hours per annum, an EPL will be required for the proposal.

Given the nature, size and distance from sensitive receivers, it is recognised that the proposal is capable of comply with requirements for EPL to be issued by NSW EPA.

The proposal's design is well progressed at this stage to ensure impacts can be appropriately managed and mitigated by the proposal, with further design refinement with regard to the location of the OEI to occur in consultation with TransGrid to avoid and/or minimise impacts to areas of high biodiversity value.

We kindly ask that DPPI prioritise the preparation of project-specific SEARs to enable the project to progress through the SSDA lodgement in early 2026.