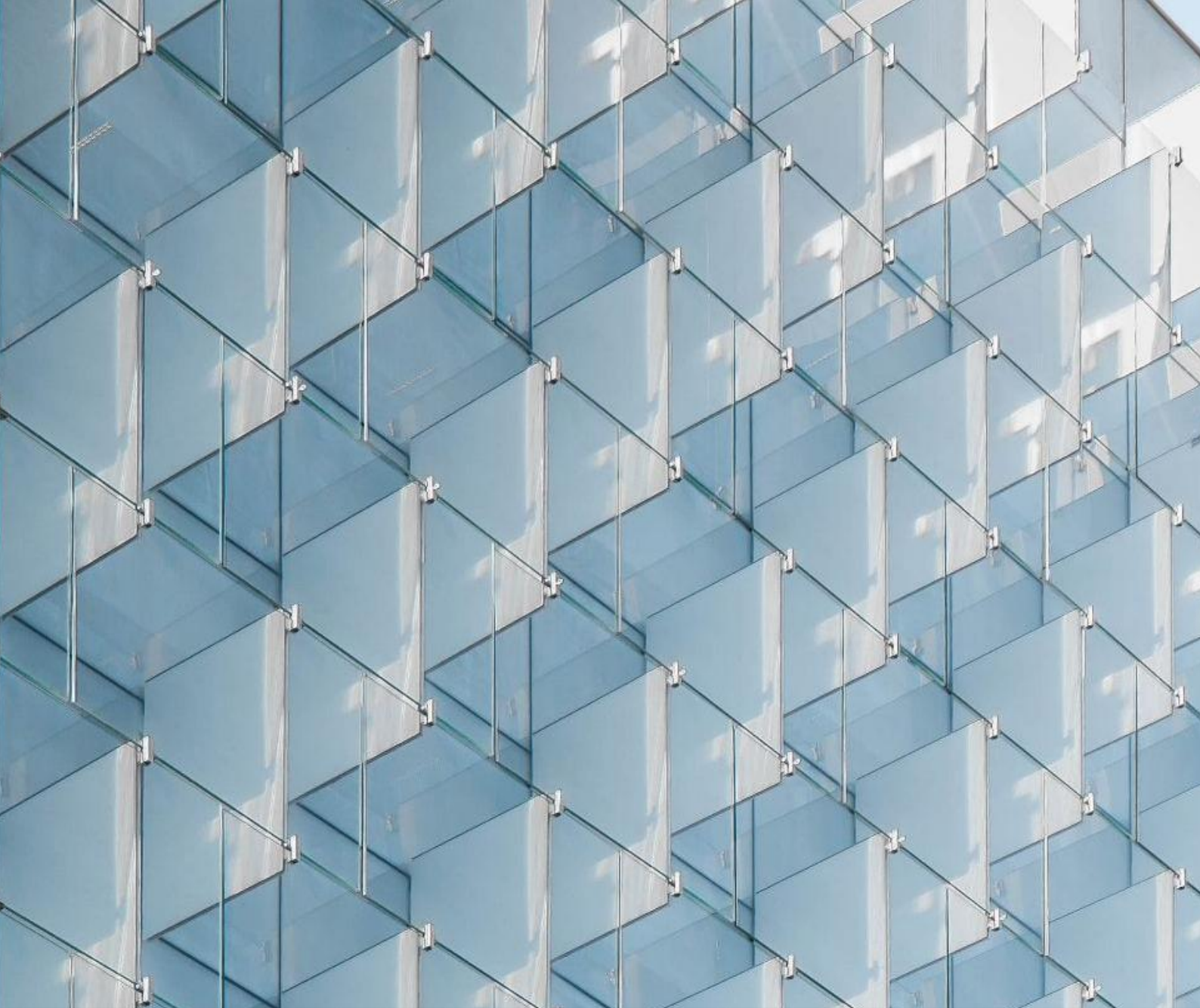




WILLOWTREE PLANNING

SCOPING REPORT

COMBINED PLANNING PROPOSAL AND STATE SIGNIFICANT DEVELOPMENT APPLICATION FOR A DATA CENTRE CAMPUS

216 Ashfords Road, Gregadoo

—

Prepared by Willowtree Planning Pty Ltd
for the Proponent

16 September 2026

SCOPING REPORT

Combined Planning Proposal and SSDA
216 Ashfords Road, Gregadoo

Willowtree Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing and ongoing connections to land, waters, and community.

We acknowledge the Wiradjuri people, the Traditional Custodians of the land to which this report relates, and pay our respects to their Elders past and present.

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SCOPING REPORT

Combined Planning Proposal and SSDA
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Disclaimer

This report has been prepared by Willowtree Planning with input from a number of other expert consultants (if relevant). To the best of our knowledge, the information contained herein is neither false nor misleading and the contents are based on information and facts that were correct at the time of writing. Willowtree Planning accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in information in this publication.

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ACRONYMS AND ABBREVIATIONS

The following acronyms and abbreviations are used throughout this Scoping Report.

Abbreviation	Definition
ABN	Australian Business Number
ACHAR	Aboriginal Cultural Heritage Assessment Report
AEP	Annual Exceedance Probability
AHIMS	Aboriginal Heritage Information Management System
BC Act	Biodiversity Conservation Act 2016
BDAR	Biodiversity Development Assessment Report
CEMP	Construction Environmental Management Plan
Cth	Commonwealth
DCP	Development Control Plan
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
FSR	Floor Space Ratio
GFA	Gross Floor Area
GHG	Greenhouse Gas
ha	hectare(s)
HPC	Housing and Productivity Contribution
IPC	Independent Planning Commission
kV	kilovolt
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
MW	megawatt
NABERS	National Australian Built Environment Rating System
NSW	New South Wales
PP	Planning Proposal
POEO Act	Protection of the Environment Operations Act 1997
PUE	Power Usage Effectiveness
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development



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Abbreviation	Definition
SSDA	State Significant Development Application
STATCOM	Static Synchronous Compensator
TfNSW	Transport for NSW
VPA	Voluntary Planning Agreement
WUE	Water Usage Effectiveness



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APPENDICES

Appendix	Document	Prepared by
A	Architectural Drawings	EJE Architecture
B	Scoping Summary Table	Willowtree Planning



EXECUTIVE SUMMARY

Overview

This Scoping Report has been prepared by Willowtree Planning (NSW) Pty Ltd (Willowtree Planning) on behalf of the Proponent to request Project-Specific Secretary's Environmental Assessment Requirements (SEARs) for a combined Planning Proposal (PP) and State Significant Development Application (SSDA) for a hyperscale data centre campus at 216 Ashfords Road, Gregadoo (the Subject Site), within the Wagga Wagga City Council local government area (LGA).

The proposed development constitutes State Significant Development under Clause 25 of Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021, as the data centre campus will have a total power consumption of up to 1.4 GW, well exceeding the applicable 15 megawatt threshold. Accordingly, the development is to be assessed under Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and must be accompanied by an Environmental Impact Statement (EIS) prepared in accordance with the SEARs issued by the Department of Planning, Housing and Infrastructure (DPHI).

The Site

The Subject Site (Lot 2 DP1143881) comprises approximately 103.8 hectares of rural land located approximately 11 kilometres south of the Wagga Wagga city centre. The land is currently used for agricultural (grazing) purposes and contains a dwelling, several outbuildings and approximately 12 dams. Boiling Down Creek traverses the central part of the Subject Site, and an existing 330kV TransGrid substation is located approximately 1.3 kilometres to the north. The Subject Site is zoned RU1 Primary Production under the Wagga Wagga Local Environmental Plan 2010 (Wagga Wagga LEP).

Proposed Development

Key features of the proposed development include:

- Four single-storey data centre buildings comprising multiple data halls, forming a master-planned data centre campus to be developed in stages over time, with a total power demand of up to 1.4 GW;
- Two (2) on-site electrical substations (Eastern substation - connects the campus to the high-voltage transmission network and transform that incoming supply down from transmission voltage to a sub-transmission level suitable for reticulation across the site. Northern substation - takes the stepped-down supply from the transmission substation and transforms it again to the operating voltage the data centre requires, then distributes that power across the campus to the data hall buildings and supporting plant) together with back-up power generation and mechanical cooling infrastructure;
- Administration, amenities and security facilities, vehicular access from Ashfords Road, together with a temporary construction access from Redbank Road via the adjoining land to the west (132 Ashfords Road), internal circulation and car parking; and
- Augmentation of utility infrastructure (electricity, water, sewer and telecommunications) and associated landscaping and stormwater management.

Planning Pathway

As the Subject Site is zoned RU1 Primary Production, in which a data centre is prohibited, a Planning Proposal is required to amend the Wagga Wagga LEP. The Planning Proposal will recommend a site-specific additional permitted use for a data centre (and associated infrastructure) on the Subject Site under Schedule 1 of the Wagga Wagga LEP, with the RU1 Primary Production zoning retained. The Planning Proposal is to be progressed concurrently with the SSDA under section 4.38(5) of the EP&A Act, with the Planning Secretary acting as the planning proposal authority.



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Strategic and Statutory Context

The proposal is consistent with the applicable strategic and statutory planning framework, including the economic development, infrastructure and digital investment directions of the Riverina Murray Regional Plan 2041 and the NSW Government's priorities for critical and digital infrastructure. A key strategic merit of the proposal is the efficient use of a large rural landholding near existing high-voltage transmission infrastructure.

Key Environmental Considerations

Having regard to a preliminary due diligence assessment of the Subject Site, the principal matters proposed to be addressed in the EIS include: built form, landscape character and visual impact; energy, electricity infrastructure and grid connection; traffic, transport and access (including upgrades to the currently unsealed Ashfords Road); noise and vibration; air quality; biodiversity (having regard to mapped Biodiversity Values along Boiling Down Creek); integrated water management and flooding (the Subject Site is partly mapped as flood affected); bushfire risk (the entire Subject Site is mapped as bush fire prone land); Aboriginal and non-Aboriginal heritage; and social and economic impact. These matters, and the anticipated technical studies and specialist guidelines that will inform their assessment, are set out in **Section 7** of this Scoping Report.

Purpose of this Report

This Scoping Report has been prepared in accordance with the Department's State significant development guidelines – preparing a scoping report and seeks the issue of Project-Specific SEARs to inform the preparation of the EIS for the SSDA, to be progressed concurrently with the Planning Proposal.



1. INTRODUCTION

This Scoping Report has been prepared by Willowtree Planning (NSW) Pty Ltd (Willowtree Planning) on behalf of the Proponent in relation to land at 216 Ashfords Road, Gregadoo (Lot 2 DP1143881) (the Subject Site), within the Wagga Wagga City Council local government area (LGA).

The proposed development comprises a combined Planning Proposal and State Significant Development Application (SSDA) for a hyperscale data centre campus. The Planning Proposal seeks to amend the Wagga Wagga Local Environmental Plan 2010 (Wagga Wagga LEP) to permit the development of a data centre on the Subject Site, while the SSDA seeks development consent for the data centre, including the site layout, building design, land uses, gross floor area and supporting infrastructure.

The purpose of this Scoping Report is to request Project-Specific Secretary's Environmental Assessment Requirements (SEARs) to inform the preparation of an Environmental Impact Statement (EIS) for the SSDA, to be progressed concurrently with the Planning Proposal.

This Scoping Report has been prepared in accordance with the Department's State significant development guidelines – preparing a scoping report and supports the request for the issue of SEARs.

1.1 Proponent Details

The Proponent details for the proposed development are listed in **Table 1** below.

Table 1. Proponent Details	
Name	CDC Data Centres Pty Ltd
ABN	59 125 710 394
Contact	Ben Andreatta
Address	11 Tom Price Street Fyshwick ACT 2609

The Proponent is a data centre developer who has experience in the design, delivery and long-term operation of large-scale data centre campuses, including facilities supporting critical national digital infrastructure, and brings this experience to the design and staging of the proposed development.

1.2 Overview of the Site and Regional Setting

The Subject Site is located at 216 Ashfords Road, Gregadoo, approximately 11 kilometres south of the Wagga Wagga city centre, within the Wagga Wagga City Council LGA in the Riverina region of NSW. Ashfords Road runs along the eastern boundary of the Subject Site. A temporary construction access is also proposed from Redbank Road to the south-west, via the southern (currently vacant) portion of the adjoining Council waste depot land at 132 Ashfords Road, Gregadoo (Lot 100 DP 1256996). Operational access to the Subject Site would be from Ashfords Road only.

The Subject Site comprises a landholding of approximately 103.8 hectares in a rural setting, currently used for agricultural (grazing) purposes, and contains a dwelling, several outbuildings and approximately 12 dams. The land is predominantly cleared, interspersed with remnant native vegetation, and Boiling Down Creek traverses the central part of the Subject Site. An existing 330kV TransGrid substation is located approximately 1.3 kilometres to the north, supporting the Subject Site's suitability for a data centre. A map of the Subject Site in its regional setting is provided in **Figure 1**.



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A wider study area has been considered for the assessment of infrastructure connections (including electricity, water, sewer and telecommunications), road access and cumulative impacts. The Subject Site currently has no connection to reticulated sewer, water, gas or telecommunications, and the provision of these services will be addressed through the application.



Figure 1. Map of the Site in its regional setting (Source: Riverina Murray Regional Plan 2041)

1.3 Overview of Development

The proposed development will comprise the following:

- A Planning Proposal to amend the Wagga Wagga LEP 2010 to permit the development of a data centre on the Subject Site and to establish appropriate development standards (refer **Section 4.2** for further detail on the nature and process for this amendment);
- A State Significant Development Application (SSDA) seeking development consent for the data centre campus and associated infrastructure, including the building layout, maximum gross floor area (GFA), land uses and the infrastructure framework to suit four single-storey data centre buildings developed over time in stages;
- Four single-storey data centre buildings comprising multiple data halls, with a total gross floor area of approximately 189,325 m² (each building approximately 47,275 m²), a building envelope of approximately 490.9 m by 169.7 m, and a total power demand of up to 1.4 GW;
- Bulk earthworks, site preparation and internal road and hardstand works;

- Two (2) on-site electrical substations (Eastern substation - connects the campus to the high-voltage transmission network and transform that incoming supply down from transmission voltage to a sub-transmission level suitable for reticulation across the site. Northern substation - takes the stepped-down supply from the transmission substation and transforms it again to the operating voltage the data centre requires, then distributes that power across the campus to the data hall building and supporting plant) together with back-up power generation and mechanical cooling infrastructure;
- Back-up power generation (up to 384 diesel generators located beneath the chiller decks), an electrical switching station, a static synchronous compensator (STATCOM), electrical yards and associated diesel fuel storage of up to approximately 6,400 tonnes;
- Mechanical cooling infrastructure (including chiller decks and pump rooms) and associated water storage and management;
- Administration and office areas, amenities, front-of-house and security gatehouses;
- Vehicular access from Ashfords Road, together with a temporary construction access from Redbank Road via the adjoining Council land to the west (132 Ashfords Road), to operate during the construction period only, internal circulation, car parking, loading and servicing;
- Augmentation of services and utility infrastructure (electricity, water, sewer and telecommunications); and
- Associated landscaping, screen planting, fencing and stormwater management, together with a rooftop solar photovoltaic array (approximately 20,160 panels; 13.10 MWp).

The Estimated Development Cost (EDC) for the proposed development is approximately \$15 billion, exclusive of GST (comprising the data centre campus and associated infrastructure). The architectural drawings have been prepared by EJE Architecture and are at Appendix A.

1.4 Objectives of the Development

The key objectives of the proposed development are:

- **Digital infrastructure:** deliver critical digital infrastructure to support the growing demand for Artificial Intelligence computing, data storage and connectivity in NSW;
- **Investment:** deliver significant private capital investment in regional NSW;
- **Employment:** generate construction employment and ongoing skilled operational jobs in the Wagga Wagga region;
- **Locational efficiency:** make use of a large rural landholding with proximity to the existing 330kV TransGrid substation and the regional road network, well separated from sensitive uses;
- **Design and amenity:** achieve a high-quality built form and landscape outcome that responds to the rural context and minimises amenity impacts; and
- **Sustainability:** deliver best-practice ecologically sustainable development outcomes, including energy and water efficiency, and rooftop solar photovoltaic generation.

1.5 Related Development

1.5.1 Planning Context at the Subject Site

The Subject Site has been used for agricultural purposes and does not have a significant recent development history. The following matters are relevant:

- The Subject Site is zoned RU1 Primary Production under the Wagga Wagga LEP 2010;
- A Planning Proposal is therefore required to amend the Wagga Wagga LEP by including a site-specific additional permitted use for a data centre (and associated infrastructure) on the Subject Site under Schedule 1, with the RU1 Primary Production zoning retained. The



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Planning Proposal is to be progressed concurrently with the SSDA under section 4.38(5) of the EP&A Act; and

- Initial investigations and preliminary technical investigations have been undertaken to inform the PP and EIS and confirm the suitability of the Subject Site.

These preliminary investigations provide an evidence base that will be developed and finalised through the EIS.



2. THE SITE

2.1 Site Identification and Characteristics

The Subject Site is identified in **Table 2** below.

Table 2. Site Identification	
Address	Legal Description / Land Area
216 Ashfords Road, Gregadoo NSW 2650	Lot 2 DP1143881. Land area approximately 103.8 hectares. A temporary construction access is proposed across part of the adjoining land at 132 Ashfords Road, Gregadoo (Lot 100 DP 1256996), owned by Wagga Wagga City Council and zoned SP1 Waste Disposal Facility.

The Subject Site has the following key constraints and characteristics:

- The Wagga Wagga Local Environmental Plan 2010 (Wagga Wagga LEP) is the principal environmental planning instrument applying to the Subject Site;
- The Subject Site is zoned RU1 Primary Production under the Wagga Wagga LEP;
- No maximum building height or floor space ratio development standard applies to the Subject Site, and a minimum lot size of 200 hectares applies under the Wagga Wagga LEP;
- The Subject Site is in a rural setting used for grazing, containing a dwelling, outbuildings and approximately 12 dams, and is well separated from sensitive receivers;
- An existing 330kV TransGrid substation is located approximately 1.3 kilometres to the north, providing a potential power supply source;
- The Subject Site has frontage to Ashfords Road (an unsealed road along the eastern boundary) and upgrades to this road are anticipated;
- A temporary construction access is proposed from Redbank Road, via the southern (currently vacant) portion of the adjoining Council waste depot land to the west at 132 Ashfords Road, Gregadoo (Lot 100 DP 1256996), which is zoned SP1 Waste Disposal Facility;
- Boiling Down Creek traverses the Subject Site, which is mapped as flood affected (within the Major Overland Flow Flood Study 2021 flood planning area and Special Flood Consideration area, affected by the 1% AEP event) as illustrated in **Figure 5**;
- The Subject Site is partly mapped as containing Biodiversity Values along Boiling Down Creek and contains remnant native vegetation as illustrated in **Figure 6**;
- The entire Subject Site is mapped as bush fire prone land as illustrated in **Figure 7**; and
- The Subject Site is on Wiradjuri Country (no Aboriginal artefacts are currently recorded on the AHIMS), and currently has no connection to reticulated sewer, water, gas or telecommunications.

Refer to **Figure 2** (Cadastral Plan), **Figure 3** (Site Location) and **Figure 4** (Zoning Map).



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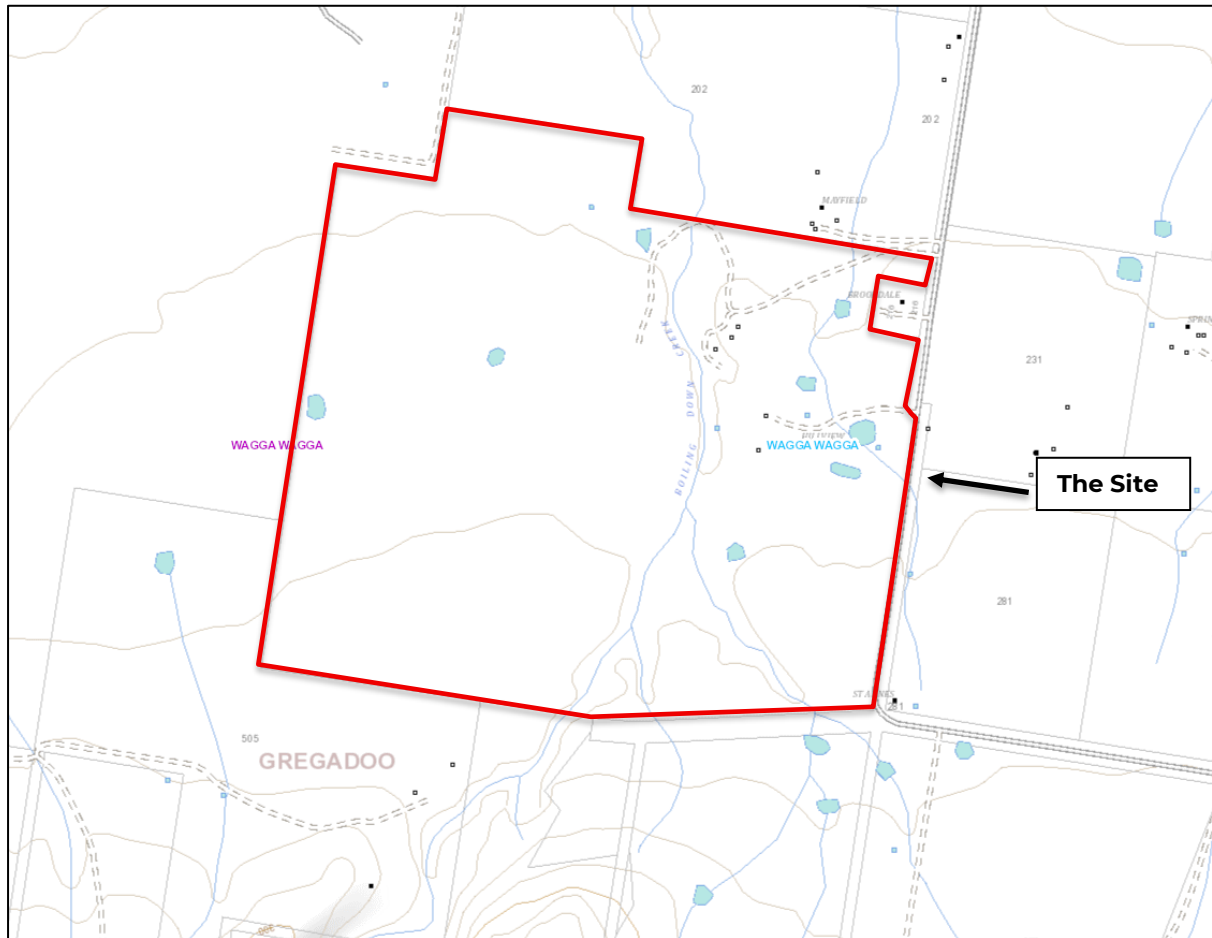


Figure 2. Cadastral Map (Source: SIX Maps, 2026)

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Figure 3. Site Location (Source: Near Map, 2026)

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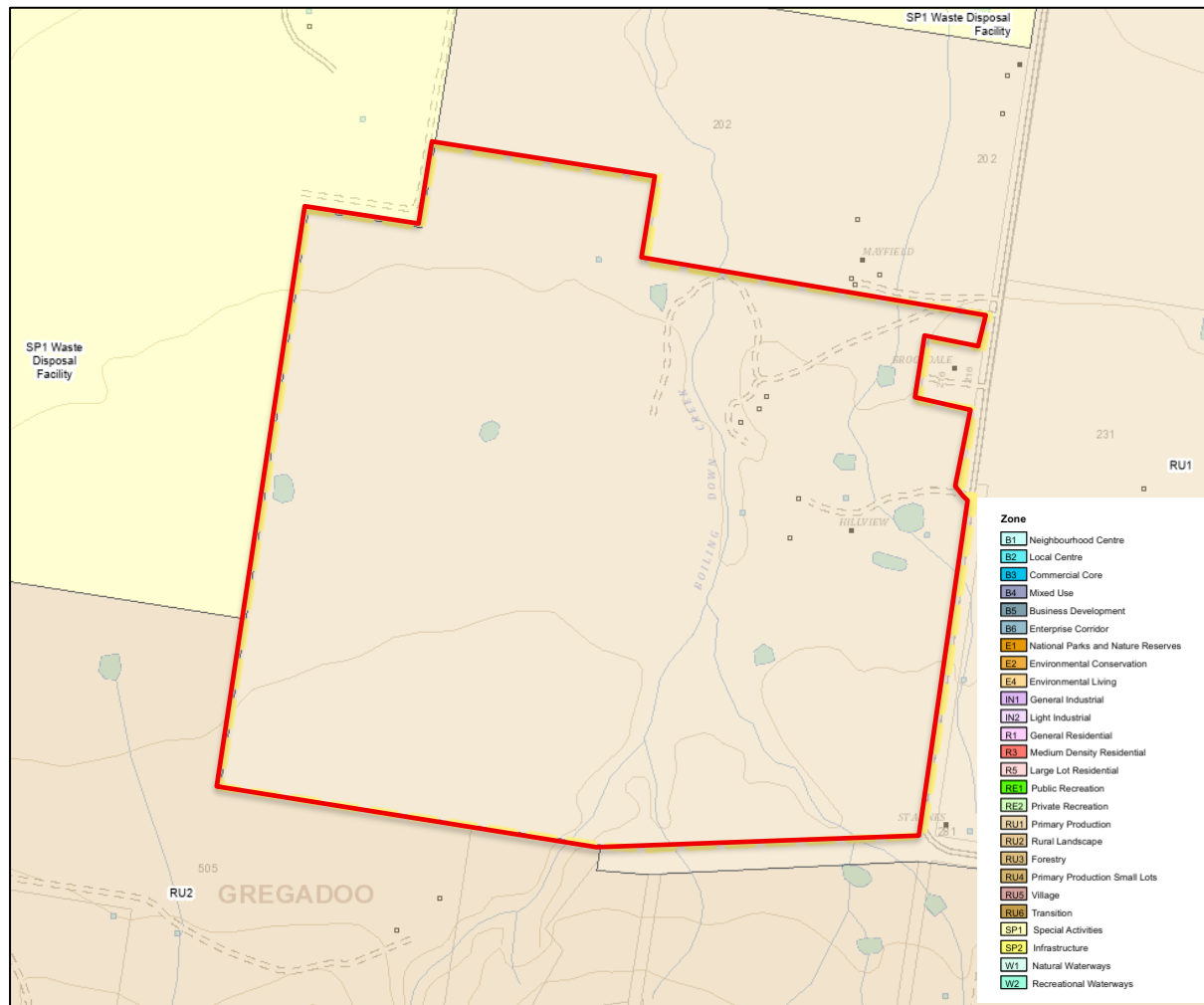


Figure 4. Zoning Map (Source: NSW Spatial Viewer, 2026)

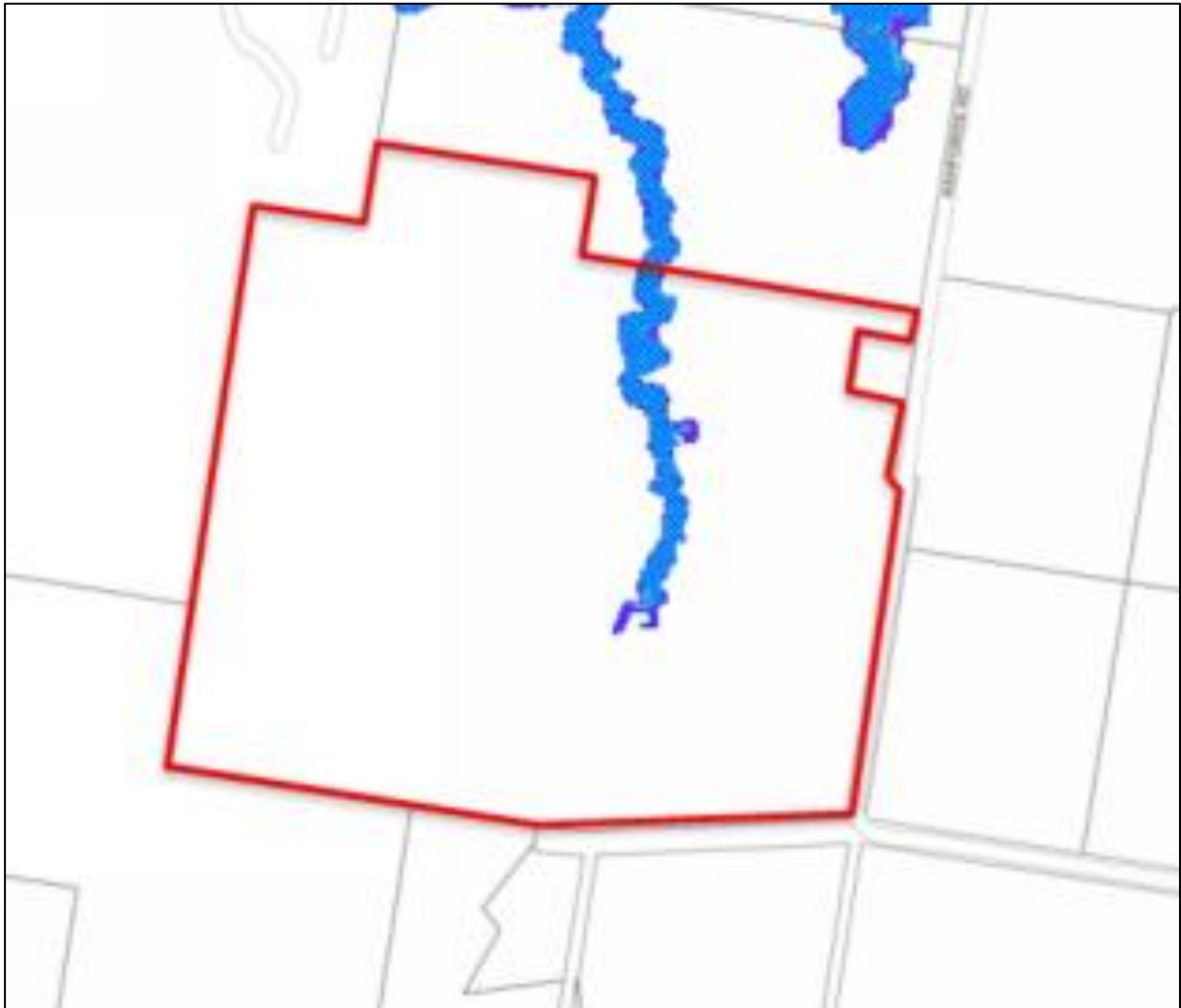


Figure 5. Flood mapping (Source: Wagga Wagga Flood Map, 2026)

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Figure 6. Biodiversity Values Map (Source: NSW Legislation, 2026)



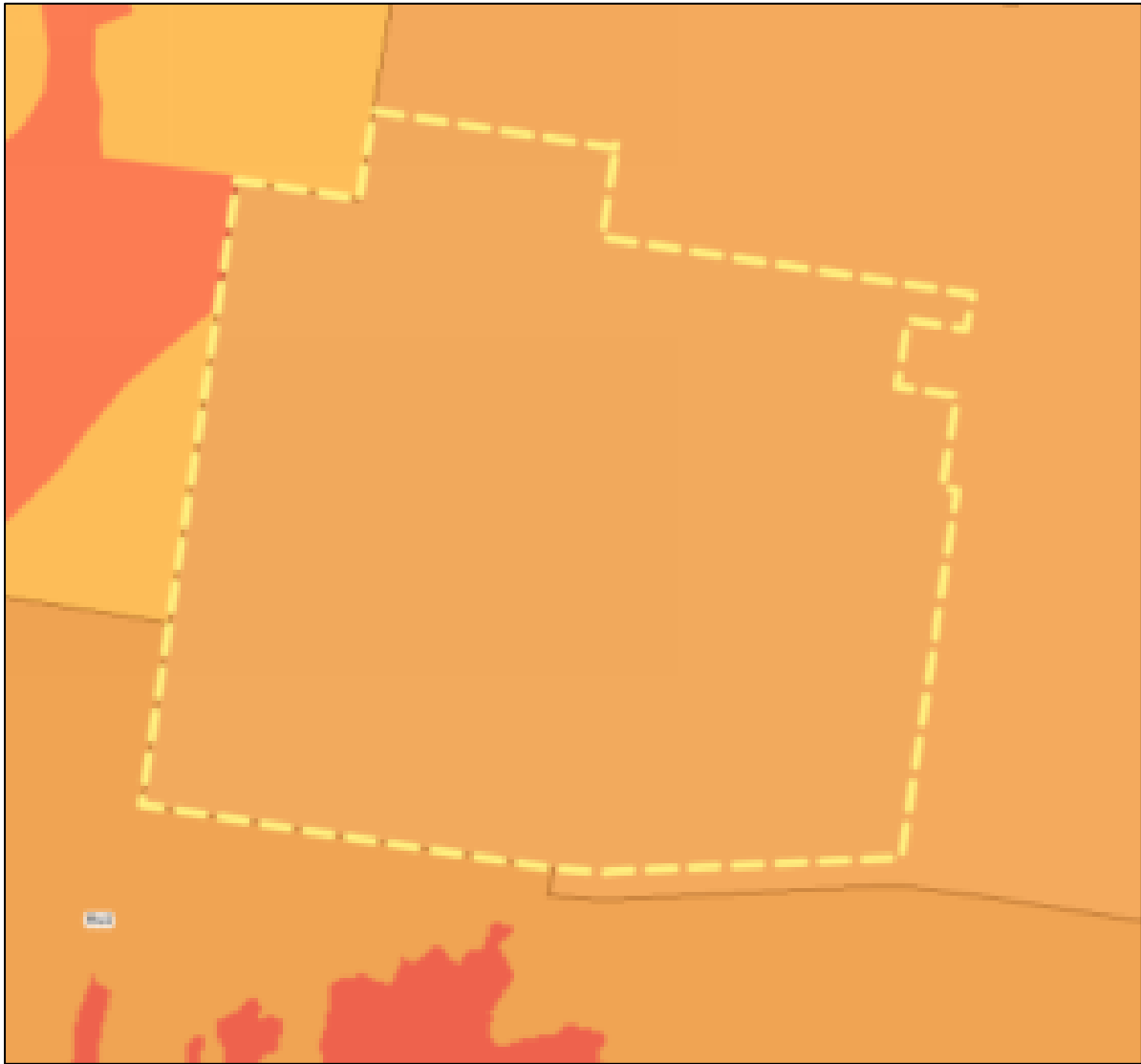


Figure 7. Bushfire Map (Source: NSW Legislation, 2026)

2.2 Site History

The Subject Site has been used for agricultural (grazing) purposes for an extended period and does not have a significant recent development history. A review of available planning records indicates no prior development applications or State significant development approvals affecting the Subject Site, and no known contamination legacy consistent with its long-standing rural use. The Subject Site has been consistently zoned RU1 Primary Production under the Wagga Wagga LEP 2010 (and its predecessor instruments), with no history of rezoning.

The Subject Site's suitability for the proposed use has emerged from broader locational and infrastructure factors rather than any change in its own development history, principally its proximity to the existing 330kV TransGrid substation, its size, and its separation from sensitive land uses. These factors are discussed further in **Section 3** (Strategic Context) and **Section 4.1** (Project Alternatives).

A review of historical aerial imagery (via the NSW Spatial Services Historical Imagery Viewer) will be undertaken as part of the EIS to confirm the land use history of the Subject Site and inform the contamination and agricultural land assessments referred to in Section 7.1.9.

The Subject Site's land use history, and its potential to contain heritage or biodiversity assets or contamination, is being confirmed through targeted studies. A search of the Aboriginal Heritage

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Information Management System (AHIMS) has returned no recorded Aboriginal sites on the Subject Site, and preliminary biodiversity studies of the site have been completed both will be finalised and reported in the EIS. On the information presently available, the Subject Site has a long-standing rural (grazing) use with no known contamination legacy, and a Preliminary Site Investigation will confirm the Site's history and identify any contamination constraints (see Section 7.1.9).

The locality is affected by mapped flood affectation associated with Boiling Down Creek and nearby watercourses (see **Figure 5**). The extent to which the developable footprint on which the data centre and associated pads would be located is subject to flooding is being confirmed through detailed flood modelling currently underway. The results, including finished floor levels and any flood mitigation measures, will be reported in the Flood Impact and Risk Assessment accompanying the EIS (see Section 7.1.12).

2.3 Existing Surrounding Development

The Subject Site sits within a rural fringe landscape on the south-eastern edge of the Wagga Wagga urban area. To the north lies a cluster of industrial and waste management uses, including the Wagga Wagga Community Recycling Centre, the Gregadoo Waste Management Centre and Carbon Mate, together with the 330kV TransGrid substation. Land to the east, south and west is predominantly rural, comprising agricultural and grazing properties consistent with the RU1 zoning. The land immediately adjoining to the west, at 132 Ashfords Road, Gregadoo (Lot 100 DP 1256996), is Council's waste depot (zoned SP1 Waste Disposal Facility), across the southern portion of which a temporary construction access is proposed. The Murrumbidgee River lies approximately 10 kilometres to the north.

A summary of surrounding development by direction is provided below.

Direction	Adjoining / Nearby Land Use
North	<p>A cluster of industrial and waste management uses, including the Wagga Wagga Community Recycling Centre, the Gregadoo Waste Management Centre and Carbon Mate, together with the existing 330kV TransGrid substation (approximately 1.3 kilometres from the Subject Site) and other proposed data centre developments in the locality.</p> <p>The Wagga Wagga Southern Growth Area is located approximately 3-5km north east of the Subject Site beyond the Waste Management Centre.</p>
East	<p>Ashfords Road, beyond which land is predominantly rural, comprising agricultural and grazing properties consistent with the RU1 zoning. The nearest sensitive receivers are two rural dwellings approximately 400 to 500 metres to the east of the proposed development footprint. Separation, access and amenity in relation to these receivers will be addressed in the EIS.</p>
South	<p>Rural land used for agricultural and grazing purposes, consistent with the RU1 zoning, extending towards the broader Riverina agricultural landscape. A rural dwelling is located approximately 250 metres to the south of the proposed development area.</p>
West	<p>Rural land used for agricultural and grazing purposes, consistent with the RU1 zoning. Boiling Down Creek traverses land to the west and south-west of the developable area. The immediately adjoining land to the west (132 Ashfords Road, Gregadoo, Lot 100 DP 1256996) is Council's waste depot, zoned SP1 Waste Disposal Facility; a temporary construction access to Redbank Road is proposed across its southern portion.</p>

The nearest sensitive receivers to the proposed data centre building are a small number of rural dwellings. Two rural dwellings are located approximately 400 to 500 metres to the east of the



proposed development footprint and one rural dwelling is located approximately 250 metres to the south. Nine rural dwellings have been identified within the vicinity of the site, as shown in **Figure 8**. The balance of the surrounding land is in agricultural and grazing use, with the nearest concentration of non-rural activity being the established utilities and waste management cluster to the north.

One rural dwelling fronting Ashfords Road would be closely bounded by the subject site. The relationship between this dwelling and the proposal, including separation distances, access arrangements and amenity, will be addressed in the EIS, and the Planning Proposal will consider the appropriate treatment of the dwelling and its curtilage within the landholding.

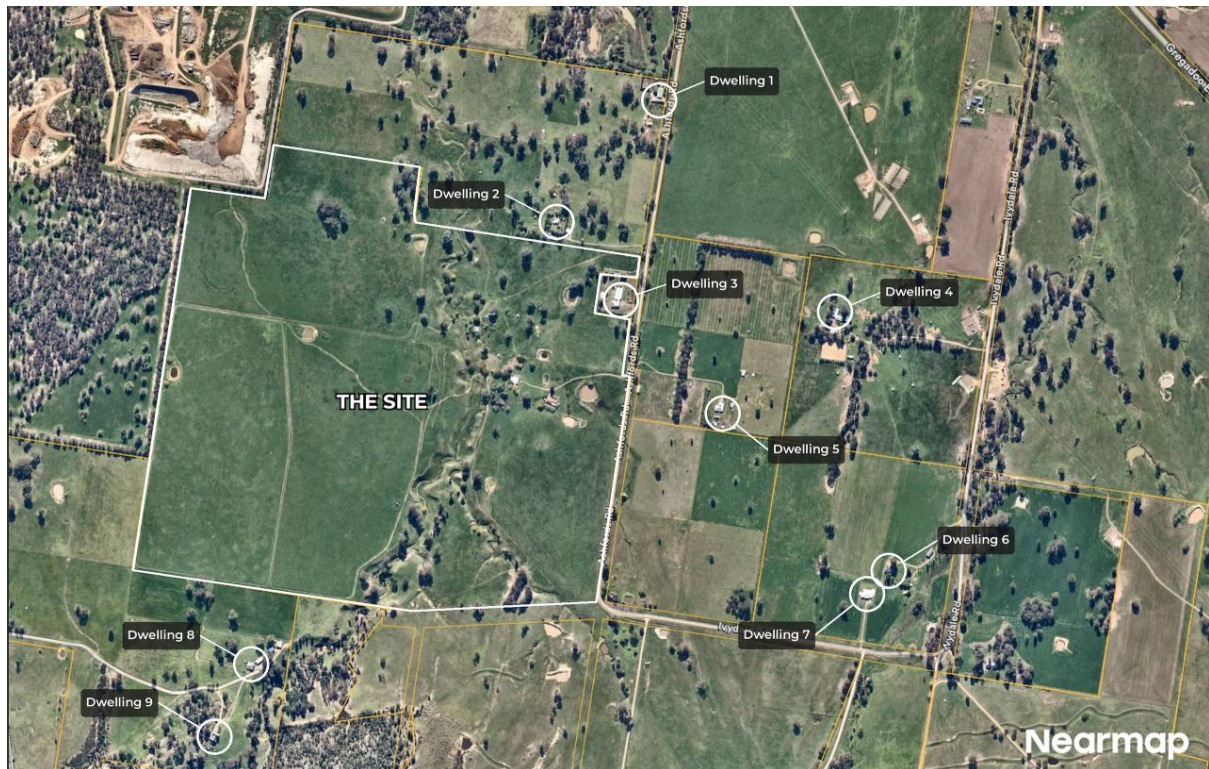


Figure 8. Annotated map – rural dwellings in the vicinity of the Subject Site (Source: Willowtree Planning)

2.4 Future Development

The Wagga Wagga LGA is identified for ongoing economic and employment growth under the Riverina Murray Regional Plan 2041. While the Subject Site is not located within the Wagga Wagga Special Activation Precinct (which lies approximately 12.5 kilometres to the north), the locality is increasingly attracting investment in industrial and digital infrastructure. The proposal supports the diversification of the regional economy.

As identified above, the Wagga Wagga Southern Growth Area is located approximately 3-5km north east of the Subject Site beyond the Wagga Wagga Waste Management Centre. Having regard for the separation distance and the location of the existing Waste Management Centre between the Subject Site and the Southern Growth Area, there is expected to be no land use conflict with the Subject Site.

3. STRATEGIC CONTEXT

This section identifies the key issues relevant to the proposal's locational and strategic context and provides justification for the proposed development. It addresses the need for the proposal, the Commonwealth, State, regional and local strategic policy setting for critical digital infrastructure, the strategic suitability of the Subject Site and the anticipated benefits of the proposal.

As the proposal comprises a combined Planning Proposal and SSDA, this section also addresses the preliminary strategic merit of the proposed amendment to the Wagga Wagga LEP. It has been prepared having regard to the strategic merit matters identified in the Department's guidelines. A detailed assessment of strategic and site-specific merit will be provided in the Planning Proposal (refer to **Section 4.2** of this report).

3.1 Need for the Proposal

This section addresses the need for the proposal and for the proposed amendment to the Wagga Wagga LEP, having regard to the existing strategic planning framework and the alternatives available to the Proponent.

3.1.1 Relationship to Endorsed Strategic Planning Framework

The Subject Site is zoned RU1 Primary Production under the Wagga Wagga LEP, in which a data centre is prohibited. An amendment to the Wagga Wagga LEP is therefore required to enable the proposed development.

The absence of a site-specific strategic study does not of itself indicate an absence of strategic merit. The strategic planning framework applying to the Wagga Wagga LGA, comprising the Riverina Murray Regional Plan 2041, the Wagga Wagga LSPS, the Wagga Wagga Community Strategic Plan 2050, the Wagga Wagga Spatial Plan 2013–2043 and Council's Economic Development Strategy, consistently directs the LGA towards economic diversification, investment attraction, employment growth and the co-location of new development with existing infrastructure. As set out at **Section 3.3**, the proposal gives effect to each of those directions. What that framework does not do is identify data centres, or the particular locational requirements of large-scale computing infrastructure, as a land use to be planned for. As set out in the reasons provided within **Section 3.1.2**, this is because that specific requirement has emerged since the relevant plans were prepared.

3.1.2 Change in Circumstances and Emerging Land Use Requirement

The Department's guidelines provide that where a proposal responds to a change in circumstances or an emerging issue that is not reflected in the existing strategic plans, the nature of that change and the reason a planning proposal is warranted should be identified. The proposal responds to a change in circumstances of that kind, comprising three related elements.

Recognition of computing capacity as critical national infrastructure

The Commonwealth and NSW policy framework for data centres and computing infrastructure has been established very recently. The Australian Government's National AI Plan was released in December 2025, and the Australian Government's Expectations of data centres and AI infrastructure developers were published on 23 March 2026. In NSW, the Investment Delivery Authority (IDA) has been established to coordinate and facilitate the assessment of major private investment proposals including data centres, and the NSW Government has developed a data centre policy framework. The Riverina Murray Regional Plan 2041, the Wagga Wagga LSPS, the Wagga Wagga Community Strategic Plan 2050 and the Wagga Wagga Spatial Plan 2013–2043 were each prepared before that framework emerged, and none identifies data centres or large-load digital infrastructure as a land use category.

Delivery of transmission capacity in the locality

The attribute that makes the locality suitable for the proposed use, being direct proximity to high-voltage transmission infrastructure with available network capacity, is itself a recent addition to the locality. The 330kV TransGrid Wagga Wagga Terminal Station was delivered as part of Project EnergyConnect, and the region's transmission capacity is being further strengthened through the South-West Renewable Energy Zone. The strategic planning framework for the LGA was prepared before that capacity was available, and consequently does not identify land in proximity to the Terminal Station as having any particular strategic function beyond its existing rural and utility uses.

The locational constraints of the land use

A hyperscale data centre is unusually constrained in its locational requirements. It requires a very large electrical load delivered at transmission voltage; a landholding of sufficient size and topography to accommodate the built form, electrical and cooling infrastructure and internal buffers; and separation from residential and other sensitive land uses. Those requirements cannot be satisfied simply by directing the use to land already zoned for employment purposes. The Wagga Wagga Special Activation Precinct (SAP) at Bomen is the LGA's principal identified industrial precinct, however it is located approximately 12.5km to the north of the Subject Site and does not have the same relationship to the 330kV transmission network. The comparative suitability of alternative sites, including employment land within the LGA, is addressed at **Section 4.1.2** and will be assessed in further detail in the Planning Proposal.

The consequence of these matters is that the land capable of accommodating the proposed use within the Wagga Wagga LGA is limited, is locationally fixed by the transmission network, and is not presently identified for employment purposes in any strategic plan. A site-specific amendment to the Wagga Wagga LEP is therefore warranted, and is the mechanism through which the strategic and site-specific merit of the land's use for this purpose can properly be tested.

3.1.3 Whether the Planning Proposal is the Best Means of Achieving the Intended Outcome

The Planning Proposal is considered to be the best means of achieving the objectives and intended outcomes of the proposed development. The following options were considered:

- **Reliance on existing permissibility.** A data centre is prohibited in the RU1 Primary Production zone. No development pathway is available under the Wagga Wagga LEP, and no existing use right is available, the Subject Site being used for grazing purposes.
- **A broader amendment to the Wagga Wagga LEP** to permit data centres generally within the RU1 zone or across the LGA. This was not preferred. An amendment of that kind would properly be a strategic planning exercise led by Council, would apply to rural land without the locational attributes of the Subject Site, and would not enable the site-specific consideration of built form, servicing and amenity that development of this scale requires.
- A site-specific additional permitted use under Schedule 1 of the Wagga Wagga LEP, permitting a data centre on the Subject Site while retaining the RU1 Primary Production zoning. This is the preferred option. It links the amendment directly to the intended data centre outcome and provides a certainty of outcome without enabling the broader range of industrial uses that a rezoning to the E4 General Industrial zone would permit. Appropriate development standards and site-specific controls for the data centre will be addressed through the Planning Proposal.
- The preferred option, being a site-specific additional permitted use for a data centre (and associated infrastructure) included in Schedule 1 of the Wagga Wagga LEP, with the RU1 Primary Production zoning retained across the landholding. This confines the change in permissibility to the data centre and its supporting infrastructure and does not alter the range of uses otherwise permissible on the surrounding rural land.

The concurrent progression of the Planning Proposal and the SSDA under Section 4.38(5) of the EP&A Act is itself relevant to the appropriateness of the mechanism. The Planning Proposal is not



speculative. It is accompanied by a specific development proposal, an indicative master plan and a full EIS, and is proposed to be publicly exhibited concurrently with that EIS. The Council, the Department and the community will therefore be able to consider the proposed amendment on the basis of a known development outcome and a quantified assessment of its impacts, rather than a theoretical development envelope. Further detail on the Planning Proposal is provided at **Section 4.2**.

3.2 Project Justification

The proposal responds to and is aligned with several key strategic and statutory planning framework documents, including:

- The Australian Government's National Artificial Intelligence (AI) Plan (December 2025), which identifies reliable, large-scale computing infrastructure as a foundation of national capability;
- The Australian Government's Expectations of data centres and AI infrastructure developers (23 March 2026);
- The NSW Government's priorities for investment in critical and digital infrastructure, including the role of the IDA in facilitating major data centre investment, and the data centre policy framework the NSW Government has been developing through public consultation;
- The economic development, infrastructure and jobs directions of the Riverina Murray Regional Plan 2041;
- The Wagga Wagga LSPS, Wagga Wagga Community Strategic Plan 2050, Wagga Wagga Spatial Plan 2013–2043 and Council's Economic Development Strategy;
- The efficient use of a site in close proximity to the existing 330kV TransGrid Wagga Wagga Terminal Station, with available network capacity;
- The efficient use of substantial public and private infrastructure investment already committed in the Riverina, including Project EnergyConnect, the South-West Renewable Energy Zone, the Wagga Wagga SAP and the Riverina Intermodal Freight and Logistics Hub; and
- The delivery of significant private capital investment and employment in regional NSW, to be wholly funded by the Proponent.

A key strategic merit of the proposal is the co-location of energy-intensive digital infrastructure in close proximity to the existing 330kV TransGrid Wagga Wagga Terminal Station, located approximately 1.3km to the north of the Subject Site. This enables connection to high-capacity transmission infrastructure without the construction of new transmission corridors, and makes efficient use of a large, isolated rural landholding that is well separated from residential areas, avoiding land use conflict and fragmentation.

The proposal responds to a rapidly growing national requirement for secure, high-performance computing capacity. The proposed campus is intended to deliver sovereign, highly secure, high-performance compute capable of supporting government, Defence, research, enterprise and AI workloads. Capacity of this kind is presently concentrated in the Sydney metropolitan area, and the proposal would establish critical digital infrastructure of national significance within regional NSW. The Proponent is an Australian-owned and Australian-based operator of sovereign data centre infrastructure.

The Wagga Wagga LGA also accommodates an established Defence presence, including RAAF Base Wagga at Forest Hill and the Army Recruit Training Centre at Kapooka, together with Charles Sturt University and TAFE NSW. While the proposed development is not dependent upon those facilities and does not form part of any Defence project, the presence of Defence, research and tertiary education institutions within the LGA is relevant strategic context for the location of sovereign computing capacity in the Wagga Wagga region, and for the delivery of the skilled operational workforce the development requires.

The proposal comprises an investment of approximately \$15 billion within a master-planned campus, and would represent one of the largest private infrastructure investments proposed for regional NSW. The investment is to be wholly privately funded and no State or Commonwealth funding contribution is sought.

The Proponent has commenced the network connection process with TransGrid, through Lumea, to secure the transmission capacity required to service the campus. Energy, electricity infrastructure and grid connection matters are addressed further at **Section 7.1.5** of this report.

3.3 Strategic Planning Policies

This section addresses the applicable Commonwealth, State, regional and local strategic planning framework.

3.3.1 Commonwealth Context

The Australian Government has identified sovereign digital capability, secure computing capacity and the responsible adoption of artificial intelligence as national priorities. The National AI Plan, released in December 2025, identifies increased computational capability and digital infrastructure, including data centres, as key enablers of AI-driven innovation and productivity growth across the economy, and commits to attracting the investment required to deliver that infrastructure. While the National AI Plan does not constitute an environmental planning instrument or development control, it provides relevant strategic context for the proposal by demonstrating that critical digital infrastructure of this kind is recognised at a national level as a contributor to innovation, productivity and investment objectives, consistent with the NSW Government's own priorities for critical and digital infrastructure referred to below.

The Australian Government's Expectations of data centres and AI infrastructure developers, published on 23 March 2026, set out five expectations against which the Commonwealth assesses the alignment of data centre and AI infrastructure proposals, being national interest, the energy transition, water efficiency, skills and workforce, and research and innovation. The Expectations indicate that proposals which do not align with them will not be prioritised by Commonwealth regulatory assessments, including grid connection applications and planning approvals, and identify alignment with the Expectations as a foundation of a data centre's social licence to operate. Although the Expectations are not a matter for consideration under the EP&A Act, they are relevant strategic context for a proposal of this scale, and the proposal has been formulated having regard to each of them. The Proponent's response to each Expectation is summarised in **Table 3**.

Table 3. Consistency with the National AI Plan Expectations

Strategic Plan / Policy	Response
Expectation 1 National interest	- An Australian-owned and Australian-based operator delivering sovereign, highly secure compute capacity able to serve government, Defence, research and enterprise customers, including AI workloads, in a region that accommodates established Defence facilities. A community benefit program is proposed to be developed in consultation with Wagga Wagga City Council and the local community.
Expectation 2 Energy transition	- A renewable energy strategy incorporating battery storage and demand flexibility, and a direct connection to the existing 330kV transmission network at the Wagga Wagga Terminal Station. The Proponent proposes to fund its own connection and associated network augmentation. These matters will be addressed in the assessment of energy, electricity infrastructure and grid connection accompanying the EIS.



Table 3. Consistency with the National AI Plan Expectations

Strategic Plan / Policy	Response
Expectation 3 – Water efficiency	A cooling strategy directed at minimising potable water consumption, with the preferred cooling technology to be confirmed through detailed design. Early engagement with Riverina Water and Council is proposed, and water demand and efficiency will be addressed in the integrated water management assessment accompanying the EIS.
Expectation 4 – Skills and workforce	Construction employment during delivery and an enduring skilled operational workforce, with a skills and training pipeline proposed to be developed with Charles Sturt University, TAFE NSW and local education providers, and local-first hiring. Employment outcomes will be quantified in the economic impact assessment accompanying the EIS.
Expectation 5 – Research and innovation	Proposed research and compute access arrangements with Charles Sturt University and other regional institutions, and local supplier development and procurement.

3.3.2 NSW Data Centre Guidelines

The NSW Data Centre Guidelines (August 2026) set out the NSW Government's support for, and expectations of, world-class data centre investment, and establish six principles against which data centre proposals are assessed. The Guidelines indicate that early engagement with DPHI and demonstrated alignment with the principles will support a more efficient and predictable assessment. A high-level assessment of the proposal against the six principles is provided below; each matter will be addressed in detail in the EIS.

Table 4. Consistency with the NSW Data Centre Guidelines

Principle	Proposal response
Principle 1 – Apply world-class environmental and efficiency standards	The data centre will be designed to meet the design PUE and WUE targets in the Guidelines, with a cooling strategy that minimises potable water use. Generator emissions, operational noise and fire and explosion risks (diesel fuel storage and lithium-ion batteries) will be assessed in the air quality, noise and preliminary hazard assessments accompanying the EIS. The site's regional, non-urban location and separation from sensitive receivers are relevant to the applicable generator emission standard.
Principle 2 – Impose no net cost to consumers and communities	The proposal locates a major new electrical load adjacent to the existing 330kV TransGrid substation, in a regional network with greater available capacity than the congested metropolitan network, reducing upstream augmentation. Commercial agreements with the energy and water utilities will address cost recovery and stranded-asset risk, and grid-demand management will be addressed in the EIS.
Principle 3 – Fund additional supply of water and energy	The Proponent will pursue power purchase and firming agreements supporting additional renewable generation and storage, and recycled-water or offset arrangements with the water utility, consistent with the renewable energy and cooling strategies. These will be detailed in the EIS.
Principle 4 – Enhance local community infrastructure and amenity	Early and ongoing engagement with the community, Council and agencies is proposed (Section 6), and a benefit-sharing program will be developed with Council and the community.



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	Consistent with the Guidelines, benefit-sharing sits outside the development application.
Principle 5 – Invest in future industries across the supply chain	The proposal will prioritise local content and procurement where feasible (e.g. piles, precast concrete panels, reinforcing, switchboards and cabling) and supports the growth of a regional digital infrastructure and technology sector (Section 3.6).
Principle 6 – Demonstrate a commitment to training and skills	Education and training partnerships are proposed with Charles Sturt University, TAFE NSW and local schools, including apprenticeship and traineeship opportunities across the construction and operational phases.

On this preliminary assessment, the proposal is capable of being designed and delivered consistent with the six principles. Its regional location, direct proximity to existing transmission infrastructure and separation from sensitive receivers align with the site-selection outcomes the Guidelines encourage. Compliance with the relevant performance measures will be demonstrated in the EIS.

3.3.3 Statewide Policy for Industrial Lands

The NSW Government published the Statewide Policy for Industrial Lands in August 2026. The policy establishes an evidence-based framework for planning for new industrial land and for protecting and intensifying existing industrial land across NSW, and is referred to in the NSW Data Centre Guidelines.

At a high level, the implications for the proposal are that the proposal facilitates a new employment-generating (industrial) land use in a location with direct access to existing electricity transmission infrastructure and adjoining an established utilities and waste management precinct. The proposal is consistent with an evidence-based approach to identifying suitable new industrial land, the proposal does not consume, fragment or sterilise existing zoned industrial land, and so does not undermine the protection or intensification of established industrial precincts. The change in permissibility is limited to a single additional use (a data centre and associated infrastructure) applying across the Subject Site, with the RU1 Primary Production zoning retained and built development concentrated within the developable footprint, so that the balance of the landholding remains available for continued rural use. The proposal's consistency with the Statewide Policy for Industrial Lands will be confirmed in the Planning Proposal and the EIS.

3.3.4 Ministerial Directions

The Planning Proposal will be prepared having regard to the applicable Ministerial Directions issued under section 9.1 of the EP&A Act (the Local Plan Making Direction, effective 1 July 2026), which group the statewide land use priorities into seven priorities. The consistency of the Planning Proposal with each applicable direction will be assessed in full in the Planning Proposal report and addressed through the comprehensive SSDA and Planning Proposal. Given the RU1 Primary Production zoning of the Subject Site, the direction of most direct relevance is Priority 3 (Prosperous) direction P3.2 – Rural, which is considered at a high level below.

Direction P3.2 applies to a planning proposal that affects land within an existing or proposed rural or conservation zone. As the Subject Site is zoned RU1 Primary Production, P3.2 applies to the Planning Proposal. The direction contains principles concerning both the rezoning of rural or conservation zoned land and the protection of rural operations.

Direction principle 1 provides that a planning proposal must not rezone land from a rural or conservation zone to a residential, employment, mixed use or certain other zones. The proposal does not rezone the Subject Site. Consistent with the mechanism described at Section 4.2, the Planning Proposal retains the RU1 Primary Production zoning and introduces a site-specific additional permitted use for a data centre under Schedule 1 of the Wagga Wagga LEP. On this basis the proposal is considered consistent with principle 1. The density principle (principle 2) does not apply, as the Wagga Wagga local government area is not listed in Schedule 1 to the direction.



As the Subject Site is located outside the metropolitan, Newcastle and Wollongong local government areas to which the relevant exception applies, the protection of rural operations principles are relevant. The Planning Proposal and EIS will demonstrate consideration of these matters, including:

- the significance of agriculture and primary production to the State and rural communities – the additional permitted use would apply to the whole of the Subject Site but permits only a data centre and associated infrastructure, with the RU1 Primary Production zoning and existing development standards retained. Built development would be concentrated within a developable footprint of approximately 63.4 hectares, with the balance of the 103.8-hectare landholding remaining available for continued rural use;
- the identification and protection of environmental values – the mapped Biodiversity Values, native vegetation and water resources along Boiling Down Creek, from which the developable pad is set back, to be assessed through the Biodiversity Development Assessment Report and the aquatic, riparian and flood assessments;
- the natural and physical constraints of the land – including topography, size, water availability and ground and soil conditions, addressed through the geotechnical, flood and integrated water management assessments;
- opportunities for investment in productive, diversified, innovative and sustainable rural economic activity – the proposal leverages existing transmission infrastructure to establish critical digital infrastructure and diversify the regional economy, without displacing surrounding agricultural production;
- support for the continued right to farm on surrounding land – land use conflict is minimised through the location of the developable footprint adjoining the established utilities and waste management cluster, and through setbacks, buffers and the perimeter earth walls;
- consideration of any State significant agricultural land identified under Chapter 2 of the State Environmental Planning Policy (Primary Production) 2021, through the agricultural land capability assessment described at Section 7.1.9; and
- the minimum lot size – the proposal retains the existing 200-hectare minimum lot size and does not seek to change it, such that the minimum lot size principle is not engaged.

On this basis, the Planning Proposal can be demonstrated to be consistent with, or capable of satisfactorily addressing, direction P3.2. A full assessment against P3.2 and each other applicable section 9.1 Ministerial Direction will be provided in the Planning Proposal report.

3.3.5 Riverina Murray Regional Plan 2041

The Subject Site is located within the Riverina Murray region, for which the Riverina Murray Regional Plan 2041 (the Regional Plan) sets out the NSW Government's 20-year land use vision. The Regional Plan is the applicable regional strategic plan for the Subject Site. The Regional Plan identifies Wagga Wagga as NSW's largest inland regional city, home to more than 67,000 people and providing commercial, health, education and civic services to a catchment of approximately 190,000 people, with Council planning for a transition to a more densely populated city of 100,000 people. The Regional Plan's vision for 2041 emphasises a diversified regional economy, capitalising on catalyst projects such as the Wagga Wagga SAP, and identifies the region as a major freight and transport distribution hub benefiting from investment in essential infrastructure.

Objective 11 of the Regional Plan recognises that ensuring the region has a sustainable and reliable power source is necessary to accommodate new economic development, and Strategy 11.1 directs strategic and statutory planning to focus development around existing infrastructure and promote co-location of new infrastructure where appropriate. The Subject Site's location in close proximity to the existing 330kV TransGrid substation responds directly to this strategy.

Objective 13 further notes that the region's electricity network is being strengthened through projects including the TransGrid/ElectraNet EnergyConnect interconnector (which will upgrade transmission capacity between Wagga Wagga and Dinawan), the South-West Renewable Energy

Zone and Snowy Hydro 2.0, reflecting the region's growing capacity to support energy-intensive digital infrastructure.

Objective 14 identifies the Wagga Wagga SAP, a 4,500ha business hub incorporating the Bomen Business Park and the Riverina Intermodal Freight and Logistics Hub, as a catalyst precinct for advanced manufacturing, renewables and value-add industries, within a regional manufacturing sector valued at \$1.7 billion and employing more than 11,600 people. While the Subject Site is not located within the Wagga Wagga SAP (which is located approximately 12.5km to the north), the proposal complements the Regional Plan's broader objective of diversifying the regional economy and attracting critical digital infrastructure investment to the Wagga Wagga sub-region. The proposal does not consume land within the SAP, and does not prejudice the delivery of the SAP or the industrial and freight uses for which it is intended.

3.3.6 Wagga Wagga Local Strategic Planning Statement

The Wagga Wagga LSPS sets out Council's 20-year land use vision and planning priorities under section 3.9 of the EP&A Act, and is the principal statement of Council's local strategic planning intent. It gives effect to the Regional Plan at a local level and is informed by the Wagga Wagga Community Strategic Plan and Council's supporting strategies. The proposal is consistent with the LSPS in the following respects:

- **Principle 1 – Protect and enhance natural areas** – the LSPS seeks to protect the LGA's productive agricultural land. While the additional permitted use would apply across the whole of the Subject Site, it permits only a data centre and associated infrastructure and retains the RU1 Primary Production zoning; built development would be confined to the developable portion of the Subject Site, with the balance of the landholding remaining in productive rural use. The agricultural land capability of the Subject Site will be assessed in the EIS, as described at Section 7.1.9.
- **Principle 2 – Increase resilience to natural hazards and land constraints** – the LSPS seeks to manage development having regard to flooding, bushfire and biodiversity. The Subject Site is affected by mapped flood affectation along Boiling Down Creek, mapped biodiversity values and bushfire prone land, and the proposal has been located and designed to respond to those constraints, as described at Section 2.1 and Sections 7.1.12, 7.1.15 and 7.1.19.
- **Principle 5 – Encourage and support investment** – the LSPS seeks to grow and diversify the Wagga Wagga economy and to attract investment and employment to the LGA. The proposal delivers a private capital investment of approximately \$15 billion, construction employment during delivery and an enduring skilled operational workforce and would anchor a new economic sector within the LGA. In addition, the Subject Site is well separated from residential and other sensitive receivers and adjoins an established cluster of utility, industrial and waste management uses to the north. The proposal is therefore located where the potential for land use conflict is minimised, and is assessed at Section 7.1.21.
- **Principle 7 – Growth is supported by sustainable infrastructure** – the LSPS seeks to align land use with the provision and capacity of infrastructure. The proposal locates a major new electrical load in direct proximity to the existing 330kV transmission network, avoiding the need for new transmission corridors, and consolidates development adjacent to an established utilities and waste management precinct.
- **Principle 10 – Provide for a diversity of housing that meets our needs** – the proposal does not consume land identified for residential growth or urban expansion. The relationship between the proposal and local housing supply, including the potential effect of the construction and operational workforce on the local housing and accommodation market, is addressed at Section 3.4.5.

3.3.7 Wagga Wagga Community Strategic Plan 2050

The Wagga Wagga Community Strategic Plan 2050 is Council's overarching community vision prepared under Section 402 of the *Local Government Act 1993*. Wagga Wagga is the largest inland city in NSW, with a population of more than 67,000 people, providing commercial, health, education and civic services to a catchment of approximately 190,000 people, and Council is planning for the transition to a city of 100,000 people. The proposal responds to the strategic directions of the Community Strategic Plan 2050 as follows:

- **Growing** – a substantial private capital investment that would anchor a regional digital infrastructure, AI and technology sector, diversifying the local economy beyond its established agricultural, health, education and Defence base, together with local supplier development and procurement;
- **Vibrant** – an enduring skilled employment base, and a community benefit program proposed to be developed in consultation with Council and the local community, in a city in which health care and social assistance is an established employing industry and in which secure computing capacity is capable of supporting health, research and AI-enabled applications. In addition, the proposal will provide a long-term local presence, education and training partnerships with Charles Sturt University, TAFE NSW and local schools, and recognition of the Subject Site's location on Wiradjuri Country;
- **Sustainable** – a renewable energy strategy, a cooling strategy directed at minimising potable water consumption, as well as best-practice sustainable design; and
- **Regional Leadership** – early and ongoing engagement with Council, relevant agencies and the community, and a transparently governed benefit-sharing program, as described at **Section 6** of this report.

3.3.8 Wagga Wagga Spatial Plan 2013–2043

The Wagga Wagga Spatial Plan 2013–2043 provides Council's long-term spatial framework for the growth and structure of the city, including the identification of urban growth fronts and employment areas. The Subject Site is located on the southern rural fringe of the city, in close proximity to an established utilities, industrial and waste management cluster, and is not identified as a residential growth front or urban expansion area. The proposal is therefore consistent with the Spatial Plan's direction to consolidate development around established infrastructure, and does not compromise or prejudice the delivery of the city's identified growth fronts.

3.3.9 Economic Development Strategy and Other Local Strategies

Council's Economic Development Strategy seeks to attract investment, generate employment and diversify the local economy beyond its established agricultural, health, education and Defence sectors. The proposal delivers an investment of approximately \$15 billion, construction and ongoing operational employment, local supplier development and procurement, and a skills and training pipeline proposed to be developed with Charles Sturt University and TAFE NSW, thereby anchoring a regional digital infrastructure and technology sector within the LGA.

The Wagga Wagga Local Housing Strategy is also relevant to the proposal, notwithstanding that the proposal is not a residential development. The proposal does not consume land identified in the Local Housing Strategy for residential development and does not reduce the LGA's housing supply capacity. The construction and operational workforce will, however, generate demand for accommodation within a market in which there is demonstrated housing pressure. That relationship is addressed at Section 3.4.5 and will be assessed in the social and economic impact assessment accompanying the EIS.

Other local strategies and plans relevant to the proposal include Council's strategies relating to integrated transport and the local road network, water and sewer servicing, waste management, and environmental and biodiversity management.



3.4 Strategic Site Suitability

For a development of this scale, site selection is determined principally by access to high-voltage transmission infrastructure with available network capacity. The Subject Site was selected because it satisfies that requirement, and because it does so without displacing land required for housing or agricultural production. The alternatives considered in identifying the Subject Site are set out at **Section 4.1.2**.

3.4.1 Why the Wagga Wagga Region

For a data centre campus of this scale, the availability of firm, high-voltage electricity supply is the primary determinant of where the development can be delivered. The metropolitan transmission network is heavily committed, and a new load of this magnitude would require substantial upstream augmentation. The attributes this land use requires, including recently delivered transmission capacity, a landholding of sufficient size and topography, and separation from residential and other sensitive land uses are more readily found in regional NSW than in the metropolitan area. Locating the campus in regional NSW also avoids competition for scarce metropolitan industrial and urban land, and directs major private investment, employment and skills into a regional economy.

Within regional NSW, the Wagga Wagga region is particularly well suited. Transmission capacity has recently been delivered through the 330kV Wagga Wagga Terminal Station, constructed as part of Project EnergyConnect, and strengthened through the South-West Renewable Energy Zone, so that connection is available without constructing new transmission corridors. Wagga Wagga is an established regional city with a workforce, services and industrial base able to support construction and an enduring skilled operational workforce, and with education and training institutions including Charles Sturt University, TAFE NSW and local providers to support the proposed skills and training pipeline. Economic diversification and network strengthening are express objectives of the Riverina Murray Regional Plan 2041 (Objectives 11, 13 and 14) and of Council's economic development strategy. The region's relatively cool climate, comparable to that of Canberra, also supports efficient operating conditions for the campus.

The selection of the Subject Site followed a sequence from the national and State need for computing capacity, recognised as critical infrastructure by the Commonwealth and NSW frameworks to the identification of locations with available high-voltage transmission capacity, a test that excludes most of the State and directs the search to the few regions where substantial capacity has recently been delivered, to the Gregadoo locality approximately 1.3 kilometres from the 330kV Terminal Station. Adjoining an established utilities, industrial and waste management cluster, and approximately 11 kilometres south of the Wagga Wagga city centre and finally to the Subject Site itself, a landholding of suitable size and topography, separated from sensitive receivers and not identified for residential growth or urban expansion. The site-specific attributes are addressed in the subsections below.

3.4.2 Proximity to Electricity Transmission Infrastructure

The Subject Site is located approximately 1.3km south of the 330kV TransGrid Wagga Wagga Terminal Station, constructed as part of Project EnergyConnect. That proximity is the primary reason for the selection of the Subject Site. It enables connection to high-capacity transmission infrastructure without the construction of new transmission corridors, makes efficient use of a large rural landholding that is well separated from residential development, and avoids the land use conflict and fragmentation that a less well-located site would create. A site without direct proximity to existing transmission infrastructure would require new transmission to be constructed, materially increasing cost, construction impact and delivery timeframes.

The Proponent has commenced the connection process with TransGrid, through Lumea, in order to secure the transmission capacity required to service the master-planned campus. The electricity supply strategy, connection arrangements and any associated network augmentation are addressed at Section 7.1.5.



3.4.3 Co-location with the Established Utilities and Waste Management Precinct

The developable portion of the Subject Site adjoins an established cluster of utility, industrial and waste management uses on the south-eastern edge of the Wagga Wagga urban area, comprising the Wagga Wagga Community Recycling Centre, the Gregadoo Waste Management Centre, Carbon Mate and the 330kV TransGrid Wagga Wagga Terminal Station. The locality therefore already accommodates uses of an industrial and utility character, together with the built form, traffic and operational characteristics associated with them.

The proposal consolidates and extends that established utilities and waste management precinct on the rural fringe, rather than establishing an isolated industrial use within an otherwise undisturbed rural landscape. This is a material consideration in the assessment of the strategic merit of the proposed amendment, and in the assessment of land use compatibility, landscape character and cumulative impact addressed at Sections 7.1.3, 7.1.21 and 7.1.24.

3.4.4 Separation from Sensitive Land Uses

The Subject Site comprises a landholding of approximately 103.8ha, of which only part is proposed to be developed. Its scale allows the proposed built form, electrical and cooling infrastructure and back-up power generation to be located within the landholding with substantial internal setbacks, landscaped buffers and separation to the site boundaries. The nearest identified sensitive receiver is a rural dwelling well separated from the proposed development area. The size and configuration of the Subject Site are therefore a strategic attribute of the proposal, as they enable noise, visual and air quality impacts to be managed in the first instance through siting and separation rather than through mitigation alone. These matters are addressed at Sections 7.1.3, 7.1.7 and 7.1.8.

3.4.5 Relationship to Housing and Agricultural Land Supply

The proposal does not displace land identified for residential development and does not remove land of State or regional agricultural significance from production. The developable portion of the Subject Site is located on the south-eastern fringe of the Wagga Wagga urban area, in close proximity to the established utilities, industrial and waste management cluster described above. The proposal therefore consolidates an established utilities and waste management precinct on the rural fringe, rather than consuming greenfield residential land.

This is a matter of particular relevance in Wagga Wagga, where there is demonstrated housing pressure, including strong demand for smaller dwellings and low rental vacancy rates. A proposal that delivers substantial employment and investment without consuming land required for housing, is well aligned with the objectives of Council's strategic planning framework and its Local Housing Strategy.

The Proponent will work with Council and other stakeholders to understand and mitigate the potential effects of the construction and operational workforce on local housing and accommodation markets, including the potential for the construction workforce to place pressure on short-term accommodation. These matters will be addressed in the social and economic impact assessment accompanying the EIS, as described at Section 7.1.17. The agricultural land capability of the Subject Site is addressed at Section 7.1.9 in relation to contamination, soils and agricultural land.

3.4.6 Access to Skills, Education and Institutional Capacity

Wagga Wagga accommodates institutional capacity relevant to the delivery and long-term operation of the proposed development, including Charles Sturt University, TAFE NSW and an established Defence presence comprising RAAF Base Wagga at Forest Hill and the Army Recruit Training Centre at Kapooka. The Proponent proposes to develop a skills and training pipeline with

Charles Sturt University, TAFE NSW and local education providers, together with research and compute access arrangements with Charles Sturt University and other regional institutions. The presence of these institutions supports the delivery of the enduring skilled operational workforce the development requires, and is relevant strategic context for the location of sovereign computing capacity within the Wagga Wagga region.

3.5 Strategic and Site-Specific Merit

Having regard to the matters set out above, the proposed amendment to the Wagga Wagga LEP is considered to exhibit preliminary strategic merit, in that it:

- Gives effect to the economic diversification, investment attraction, employment growth and infrastructure co-location directions of the Riverina Murray Regional Plan 2041, the Wagga Wagga LSPS, the Wagga Wagga Community Strategic Plan 2050, the Wagga Wagga Spatial Plan 2013–2043 and Council's Economic Development Strategy;
- Is consistent with State land use priorities for critical and digital infrastructure and with the directions of the data centre policy framework the NSW Government has been developing, and delivers major private capital investment in regional NSW with no State funding contribution sought;
- Responds to a change in circumstances that is not reflected in the existing strategic plans, being the emergence of a national requirement for secure, large-scale computing capacity and the delivery of transmission capacity in the locality through Project EnergyConnect;
- Is confined to the extent of land necessary to enable the proposed development;
- Is accompanied by a specific development proposal and a full EIS, to be exhibited concurrently, so that the proposed amendment can be assessed on the basis of a known development outcome.

The proposal is also considered to exhibit preliminary site-specific merit, in that:

- The Subject Site is located approximately 1.3km from the 330kV TransGrid Wagga Wagga Terminal Station, enabling connection to high-capacity transmission infrastructure without the construction of new transmission corridors;
- The developable portion of the Subject Site adjoins an established utilities, industrial and waste management cluster, such that the proposal consolidates rather than fragments that precinct;
- The Subject Site is of sufficient scale to accommodate the proposed built form together with substantial setbacks, buffers and separation to sensitive receivers, and is not identified for residential growth or urban expansion; and
- The constraints affecting the Subject Site, including flood affectation along Boiling Down Creek, mapped Biodiversity Values and bushfire prone land, are capable of being addressed through siting, design and the technical assessments identified at **Section 7**.

A detailed assessment of strategic and site-specific merit, including consistency with each applicable Local Planning Direction issued under Section 9.1 of the EP&A Act and the relevant SEPPs, will be provided in the Planning Proposal.

3.6 Project Benefits

The proposal is anticipated to deliver the following key benefits:

- Delivery of sovereign, highly secure, high-performance critical digital infrastructure in NSW, with capacity able to support government, Defence, research, enterprise and AI workloads, and responding to the growing demand for cloud computing, data storage, connectivity and artificial intelligence services;



- A significant private capital investment in regional NSW, estimated at approximately \$15 billion within a master-planned campus, representing a multi-billion dollar investment over its life, and among the largest private investments proposed in regional New South Wales, with no State funding contribution sought;
- Substantial construction employment during delivery, together with an enduring skilled operational workforce, and a skills and training pipeline proposed to be developed with Charles Sturt University, TAFE NSW and local education providers;
- Efficient use of a large rural landholding in close proximity to existing high-voltage transmission infrastructure, avoiding the need for new transmission corridors, and consolidation of an established utilities and waste management precinct;
- Efficient use of substantial public and private infrastructure investment already committed in the Riverina, including the transmission capacity delivered through Project EnergyConnect and strengthened through the South-West Renewable Energy Zone;
- Diversification of the regional economy and the anchoring of a regional digital infrastructure and technology sector, consistent with the strategic directions of the Riverina Murray Regional Plan 2041 and Council's growth strategies;
- A renewable energy strategy incorporating battery storage, together with a cooling strategy and sustainable design measures directed at minimising energy and potable water consumption, supporting the region's transition to net zero;
- Local supplier development and procurement, and a community benefit program proposed to be developed in consultation with Council and the local community;
- Retention of the balance of the landholding in the RUI Primary Production zone, so that the proposal does not consume land identified for residential growth or remove land of State or regional agricultural significance from production; and
- A location well separated from residential and other sensitive land uses, minimising the potential for land use conflict.



4. PROJECT DESCRIPTION

The key details of the proposed development are outlined in **Table 5** below. The architectural drawings are provided at **Appendix A**.

Table 5. Key Development Particulars	
Element	Particular
Site Area	Approximately 103.8 hectares
Application Type	Combined Planning Proposal and State Significant Development Application
Description of Development	A data centre campus comprising four single-storey data centre buildings and supporting infrastructure, developed over time in stages.
Proposed LEP Amendment (PP)	Amendment to the Wagga Wagga LEP 2010 to permit a data centre on the Subject Site and establish appropriate development standards
IT Load	A total power demand of up to 1.4 GW (well exceeding the 15 MW SSD threshold under the Planning Systems SEPP 2021).
Built Form	Four single-storey data centre buildings with multiple data halls, a total gross floor area of approximately 189,325 m ² and a building envelope of approximately 490.9 m by 169.7 m; mechanical chiller decks, electrical yards, up to 384 back-up diesel generators, two on-site substations, and a rooftop solar array (13.10 MWp).
Infrastructure	Dedicated high-voltage connection to the adjacent 330kV TransGrid network, water supply, sewer and telecommunications connections
Estimated Development Cost	Approximately \$15 billion, exclusive of GST, comprising the data centre campus and associated infrastructure.

The concept architectural plans are provided at **Appendix A** and are shown in Figure 9 and Figure 10 below.

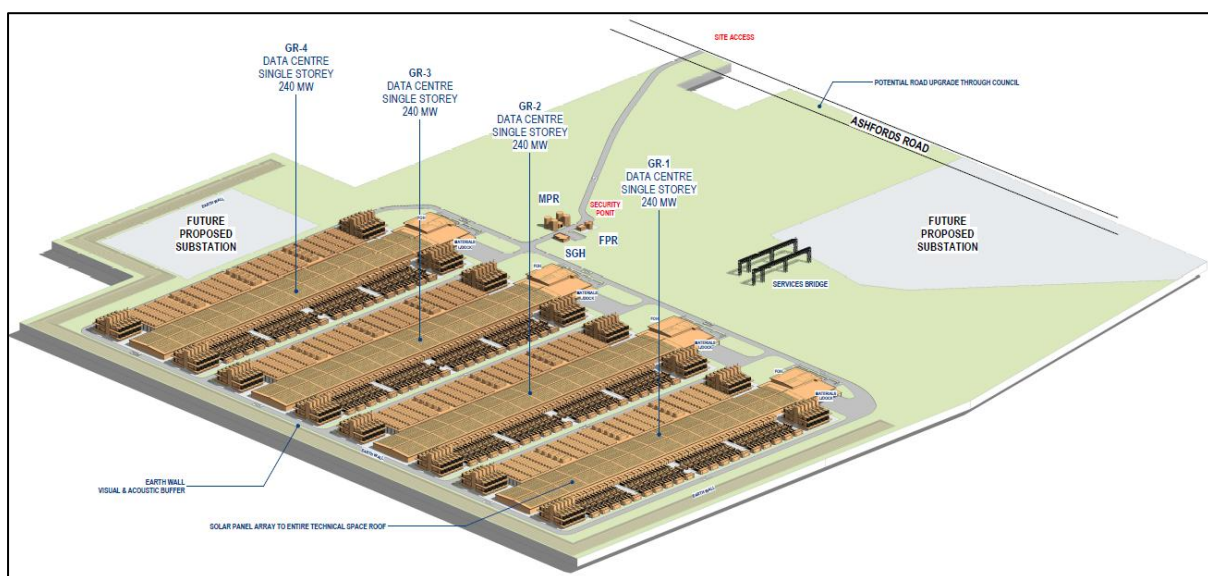


Figure 9. 3D Massing (Source: EJE Architects 2026)



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Figure 10. Site Plan (Source: EJE Architects 2026)

4.1 Project Alternatives

In accordance with the Department's scoping report guidelines, the following alternatives were considered in identifying the Subject Site and the proposed built form.

4.1.1 Do Nothing

Under a "do nothing" scenario, the Subject Site would remain in its current agricultural use and no additional digital infrastructure capacity would be delivered on the site. This option was not preferred as it would not respond to the growing demand for cloud computing, data storage and connectivity in NSW, would forgo the opportunity to make efficient use of the Subject Site's proximity to the existing 330kV TransGrid substation, and would not deliver the private capital investment and employment benefits described in **Section 3**.

4.1.2 Alternative Sites

Site selection for the proposed development was informed by a number of key criteria relevant to hyperscale data centre development, including: proximity and access to high-voltage transmission infrastructure with available network capacity; a landholding of sufficient size and topography to accommodate the proposed campus and its buffers; separation from residential and other sensitive land uses; access to the regional road network; and the ability to secure connections to water, sewer and telecommunications infrastructure over time. The Subject Site's direct adjacency to the existing 330kV TransGrid substation, its large area (approximately 103.8 hectares), and its separation from sensitive receivers were key factors distinguishing it from alternative sites considered in the Wagga Wagga LGA and broader Riverina region. Alternative sites lacking direct proximity to high-voltage transmission infrastructure would require the construction of new transmission corridors, materially increasing cost, construction impact and delivery timeframes.

4.1.3 Alternative Technologies

The Proponent has had regard to alternative cooling and back-up power technologies in developing the concept design, including the relative water consumption of evaporative versus mechanical cooling systems, and the emissions profile of diesel back-up generation compared to alternative technologies. The preferred approach and its justification, including any resulting sustainability commitments, will be confirmed through detailed design and reported in the ESD Report accompanying the EIS.

4.1.4 Justification for the Preferred Option

The Subject Site and the proposed built form are considered to represent the preferred option having regard to:

- The direct adjacency of the Subject Site to the existing 330kV TransGrid substation, avoiding the need for new transmission infrastructure;
- The scale of the landholding, which accommodates the proposed built form together with appropriate setbacks, landscaping and buffers to Boiling Down Creek;
- The separation of the Subject Site from residential and other sensitive land uses, minimising the potential for land use conflict; and
- The consistency of the proposal with the strategic and statutory planning framework described in **Section 3** and **Section 5** of this Scoping Report.

4.2 The Planning Proposal

As the Subject Site is zoned RU1 Primary Production, a Planning Proposal is required to amend the Wagga Wagga Local Environmental Plan 2010 (Wagga Wagga LEP) to permit the development. Under section 4.38(5) of the EP&A Act, the PP will be progressed concurrently with the SSDA, with the Planning Secretary acting as the planning proposal authority.

The core objective of the Planning Proposal is to amend the Wagga Wagga LEP to permit the development. It is proposed to include a site-specific additional permitted use for a data centre (and associated infrastructure) across the whole of the Subject Site under Schedule 1 of the Wagga Wagga LEP, with the RU1 Primary Production zoning and the current development standards retained. The additional permitted use is proposed to apply to the entire Subject Site, rather than only the developable footprint, so that a data centre (and associated infrastructure) is the sole additional use enabled across the landholding, providing certainty of outcome. Built development would be concentrated within the developable footprint identified in the SSDA, with the balance of the Subject Site remaining available for continued rural use.

The intended outcomes of the Planning Proposal are to:

- include a site-specific additional permitted use for a data centre and its supporting infrastructure in Schedule 1 of the Wagga Wagga LEP, applying to the whole of the Subject Site, with the RU1 Primary Production zoning retained;
- retain the current height of buildings and floor space ratio development standards; and
- facilitate investment in critical digital infrastructure consistent with State and regional strategic planning.

The Planning Proposal will demonstrate the strategic and site-specific merit of the amendment, including the justification for permitting a data centre on the Subject Site and the limited change to the permissible use of the land that this involves, and consistency with the applicable section 9.1 Ministerial Directions, the relevant State Environmental Planning Policies, the Riverina Murray Regional Plan 2041 and the Wagga Wagga Local Strategic Planning Statement. The strategic context is addressed further in Section 3.



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The Planning Proposal report will include a detailed assessment of consistency with the applicable Local Planning Directions issued under section 9.1 of the EP&A Act, including those relevant to employment and resource lands, rural and environmental protection, transport and infrastructure, and natural hazards, to be confirmed and addressed in full at the Planning Proposal stage.

Following lodgement, the Planning Proposal will be subject to a Gateway determination and the plan-making process under Part 3 of the EP&A Act, and will be publicly exhibited concurrently with the EIS for the SSDA. The Planning Proposal report and draft LEP amendment are identified as a key deliverable in Section 7.3.



5. STATUTORY CONTEXT

This section of the Scoping Report outlines the key statutory requirements relevant to the Subject Site and the proposal. **Table 6** categorises and summarises the relevant requirements in accordance with the Guidelines.

5.1 Power to Grant Approval

Table 6. Power to Grant Consent	
Matter	Consideration
Declaration of SSD	<p>Development consent will be sought under Division 4.7 (State Significant Development) of the EP&A Act 1979. Section 4.36(2) of the EP&A Act states that:</p> <p><i>A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.</i></p> <p>Schedule 1 of <i>State Environmental Planning Policy (Planning Systems) 2021</i> (Planning Systems SEPP) lists development that is declared SSD. Schedule 1, Clause 25, provides the following:</p> <p>25 Data centres</p> <p>(1) <i>Development for the purpose of data centres that has a total power consumption of more than the relevant amount.</i></p> <p>(2) <i>In this section relevant amount means</i></p> <p>(a) <i>for development in relation to which the relevant environmental assessment requirements are notified under the Act on or before 31 May 2023—10 megawatts, or</i></p> <p>(b) <i>for any other development—15 megawatts.</i></p> <p>The development is for a data centre that will exceed a power consumption of 15 megawatts. The proposed development has an EDC of approximately \$15 billion.</p> <p>Accordingly, the proposed development is SSD.</p>
Concurrent Planning Proposal	<p>Section 4.38(5) of the EP&A Act prescribes that a development application in respect of State significant development that is wholly or partly prohibited may be considered in accordance with Division 3.5 in conjunction with a proposed environmental planning instrument to permit the carrying out of the development. The Planning Secretary may (despite anything to the contrary in section 3.32) undertake the functions of the planning proposal authority under Part 3 for a proposed instrument if it is initiated for the purpose of permitting the carrying out of the development (whether or not it contains other provisions).</p> <p>As the Subject Site is zoned RU1 Primary Production, the SSDA is accompanied by a concurrent Planning Proposal under section 4.38(5) of the EP&A Act to amend the Wagga Wagga LEP 2010 by adding a site specific additional permitted use for a data centre via Schedule 1.</p>
Consent Authority	<p>The consent authority is the Minister for Planning (or delegate). The Independent Planning Commission will be the consent authority if more than 100 submissions are received, or a reportable political donation has been made.</p>



5.2 Permissibility

The permissibility of the proposed development is outlined in **Table 7** below.

Table 7. Permissibility	
Matter	Consideration
Land Zoning	The Subject Site is zoned RU1 Primary Production under the Wagga Wagga LEP 2010. No maximum building height or FSR standard applies and the minimum lot size is 200 hectares.
Permissibility	<p>A data centre is currently prohibited in the RU1 Primary Production zone under the Wagga Wagga LEP 2010. The concurrent Planning Proposal under section 4.38(5) of the EP&A Act seeks to amend the Wagga Wagga LEP by including a site-specific additional permitted use for a data centre (and associated infrastructure) on the whole of the Subject Site under Schedule 1, so that the development is permissible with consent while the RU1 Primary Production zoning is retained.</p> <p>A data centre falls within the definition of <i>high technology industry</i>, which is a type of <i>light industry</i> under the <i>Standard Instrument—Principal Local Environmental Plan (2006)</i>. <i>Industry</i> means any of the following:</p> <ul style="list-style-type: none"> (a) <i>general industry</i>, (b) <i>heavy industry</i>, (c) <i>light industry</i>. <p>The additional permitted use will permit a data centre (as a form of high technology industry) with consent on the Subject Site. The temporary construction access proposed over part of the adjoining land at 132 Ashfords Road, Gregadoo (Lot 100 DP 1256996), which is zoned SP1 Waste Disposal Facility, is limited to the construction period and does not form part of the additional permitted use sought by the Planning Proposal.</p>

5.3 Other Approvals

Table 8 outlines the legislative approvals relevant to the proposed development in addition to development consent under the EP&A Act.

Table 8. Other Approvals		
Matter	Consideration	
Approvals not required for SSD	Section 4.41 of the EP&A Act provides that certain authorisations are not required for SSD (e.g. various approvals under the Heritage Act, Water Management Act and POEO Act). Relevant approvals will be identified in the EIS.	
	Act	Approval Otherwise Required
	A permit under section 201, 205 or 219 of the <i>Fisheries Management Act 1994</i>	No
	An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i>	No
	An Aboriginal heritage impact permit under section 90 of the <i>National Parks and Wildlife Act 1974</i>	No
	A bush fire safety authority under section 100B of the <i>Rural Fires Act 1997</i>	No



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Table 8. Other Approvals

Matter	Consideration	
	A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the <i>Water Management Act 2000</i> .	Yes – controlled activity approval sought due to the proximity to Boiling Down Creek.
Consistent approvals	Section 4.42 of the EP&A Act provides that certain authorisations cannot be refused if necessary for carrying out SSD and must be substantially consistent with the consent.	
	Legislation	Approval Required
	An aquaculture permit under section 144 of the <i>Fisheries Management Act 1994</i>	No
	An approval under section 22 of the <i>Coal Mine Subsidence Compensation Act 2017</i>	No
	A mining lease under the <i>Mining Act 1992</i>	No
	A production lease under the <i>Petroleum (Onshore) Act 1991</i>	No
	An environment protection licence under Chapter 3 of the <i>Protection of the Environment Operations Act 1997</i> (for any of the purposes referred to in section 43 of that Act)	Yes
	A consent under section 138 of the <i>Roads Act 1993</i>	Yes – due to works required in the road reserve.
Other approvals / agreements	A licence under the <i>Pipelines Act 1967</i>	No
	Electricity connection agreements with TransGrid and water/sewer servicing agreements will also be required. As the proposed temporary construction access to Redbank Road crosses Council-owned land at 132 Ashfords Road, Gregadoo (Lot 100 DP 1256996), the owner's consent of Wagga Wagga City Council will be required for the SSDA insofar as it applies to that land.	

5.4 Pre-Conditions

The pre-conditions relevant to the proposal are outlined in **Table 9**. These matters will be addressed in detail within the EIS.

Table 9. Pre-Conditions

Statutory Reference	Pre-Condition
Resilience and Hazards SEPP 2021	Chapter 4 (Remediation of Land) – contamination must be considered, having regard to the agricultural land use history.
Biodiversity and Conservation SEPP 2021 / BC Act 2016	Under Clause 7.9 of the Biodiversity Conservation Act 2016, an SSD must be accompanied by a Biodiversity Development Assessment Report (BDAR) unless determined not required. Biodiversity Values are mapped along Boiling Down Creek, so a BDAR will accompany the forthcoming EIS.



Table 9. Pre-Conditions	
Statutory Reference	Pre-Condition
Transport and Infrastructure SEPP 2021	Provisions relating to traffic generating development and development affecting the classified road and electricity network.
EP&A Regulation 2021	Relevant procedural requirements for State Significant development applications.

5.5 Mandatory Consideration

Table 10 provides a summary of the matters that the consent authority must consider in deciding whether to grant consent. These matters will be addressed in the EIS.

Table 10. Matters For Mandatory Consideration	
Legislation / Statutory Reference	Matters for Consideration
Consideration under the EP&A Act and EP&A Regulation	
Section 1.3	Relevant objects of the EP&A Act.
Section 4.15	Relevant environmental planning instruments: <ul style="list-style-type: none"> State Environmental Planning Policy (Planning Systems) 2021; State Environmental Planning Policy (Transport and Infrastructure) 2021; State Environmental Planning Policy (Industry and Employment) 2021; State Environmental Planning Policy (Resilience and Hazards) 2021; State Environmental Planning Policy (Biodiversity and Conservation) 2021; State Environmental Planning Policy (Precincts—Regional) 2021; State Environmental Planning Policy (Sustainable Buildings) 2022; and Wagga Wagga Local Environmental Plan 2010.
	Relevant development control plan
	Relevant draft environmental planning instruments
	Relevant planning agreements or draft planning agreements
	The Regulations
	The likely impacts of the development
	Under Part 2.2 (Clause 2.10) of the Planning Systems SEPP, development control plans do not apply to State Significant development. The Wagga Wagga Development Control Plan 2010 will be considered as a guide where relevant.
	The draft Climate Change and Natural Hazards SEPP applies to the Subject Site.
	The Subject Site is not subject to any planning agreements. The need for a Voluntary Planning Agreement will be confirmed in the EIS.
	The Environmental Planning and Assessment Regulation 2021, to the extent that it prescribes matters for consideration.
	The likely impacts of the proposed development have been identified in Section 7 of this Scoping Report including those matters requiring further assessment in the EIS.



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Table 10. Matters For Mandatory Consideration

Legislation / Statutory Reference	Matters for Consideration	
	Suitability of the site and the public interest	These matters will be fully addressed within the EIS.
	Submissions made in accordance with the Act or the regulation	Early engagement will be undertaken with the community and agencies to ensure that the views are appropriately considered and detailed in the EIS. A detailed response to any submissions will be provided following lodgement and public exhibition of the EIS.
Section 4.38	Section 4.38 sets out the provisions for determining a State Significant development application. As the Subject Site is zoned RU1 Primary Production, section 4.38(5) enables the application to be considered together with the concurrent Planning Proposal to amend the Wagga Wagga LEP 2010.	
Consideration under Environmental Planning Instruments		
Planning Systems SEPP 2021	Chapter 2 – State Significant development. Data centres with a total power consumption exceeding 15MW are State Significant development under Clause 25 of Schedule 1.	
Wagga Wagga LEP 2010	Zoning, permissibility and development standards (as amended by the concurrent Planning Proposal). The Subject Site is zoned RU1 Primary Production. No maximum building height or floor space ratio development standard applies to the Subject Site.	
Transport and Infrastructure SEPP 2021	Traffic generating development; and development affecting the classified road and electricity infrastructure.	
Industry and Employment SEPP 2021	Provisions relevant to advertising and signage provisions would apply to any future development for advertising and signage at the Subject Site.	
Resilience and Hazards SEPP 2021	Chapter 4 - contamination and remediation and hazardous and offensive development (dangerous goods storage).	
Biodiversity and Conservation SEPP 2021	Relevant chapters, including native vegetation and the Biodiversity Values mapping along Boiling Down Creek. A BDAR will accompany the forthcoming EIS.	
Sustainable Buildings SEPP 2022	Sustainability standards for non-residential development. The EIS will be accompanied by a NABERS Embodied Emissions Materials Form and Ecologically Sustainable Development Report.	
Consideration under other legislation		
Environment Protection and Biodiversity Conservation Act 1999 (Cth)	Referral required only if the development is likely to significantly impact a matter of national environmental significance. The matters of national environmental significance protected under the EPBC Act include: World Heritage properties; National Heritage places; wetlands of international importance (Ramsar wetlands); listed threatened species and ecological communities; migratory species protected under international agreements; Commonwealth marine areas; the Great Barrier Reef Marine Park; nuclear actions; and water resources in relation to coal seam gas and large coal mining development. Referral under the EPBC Act is not anticipated to be	



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Table 10. Matters For Mandatory Consideration	
Legislation / Statutory Reference	Matters for Consideration
	required; however this will be confirmed through the biodiversity and heritage assessments accompanying the EIS.
Biodiversity Conservation Act 2016	Section 7.9 requires an SSD to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless determined not required.
Protection of the Environment Operations Act 1997	An Environment Protection Licence (EPL) is likely to be required, having regard to the proposed on-site diesel fuel storage of up to approximately 6,400 tonnes, which exceeds the 2,000-tonne threshold under Schedule 1 of the Act, and to the electricity generation capacity. The requirement will be confirmed in the EIS, which will be accompanied by an EPL assessment and a Preliminary Hazard Analysis.
Water Management Act 2000	Controlled Activity Approval, as relevant to any works affecting Boiling Down Creek.
Rural Fires Act 1997	The Subject Site is bush fire prone land, so the development must satisfy the requirements of Planning for Bush Fire Protection 2019.



6. ENGAGEMENT

This section identifies the relevant stakeholders, the consultation carried out to date, and the engagement to be carried out during preparation of the EIS.

6.1 Relevant Stakeholders

The following stakeholders are identified, having regard to the nature of the proposal and its impacts:

- The Department of Planning, Housing and Infrastructure (and the Investment Delivery Authority);
- Wagga Wagga City Council;
- Transport for NSW (in relation to the classified road network and traffic generating development);
- Transgrid and Essential Energy (in relation to electricity transmission and supply, including the adjacent 330kV substation);
- The NSW Environment Protection Authority (in relation to air, noise, contamination and hazards);
- Service providers: water/sewer and telecommunications providers and other utilities;
- Heritage NSW, the NSW Rural Fire Service, the local Aboriginal Land Council and registered Aboriginal parties; and
- The local community and surrounding landowners.

In relation to servicing, the relevant water and sewer authorities are Riverina Water (water) and Wagga Wagga City Council (sewer). Preliminary consultation has been undertaken with Riverina Water regarding the permanent water supply, which is expected to be provided by an extension of the existing DN300 water main near the Lake Albert Fire Station, approximately 2.6 kilometres from the Subject Site, with the required upgrades to be confirmed by Riverina Water once the development's water demands are finalised. Wagga Wagga City Council has advised that connection to its reticulated sewer is not feasible given the distance involved, and an on-site wastewater solution will therefore be adopted. These servicing arrangements will be detailed in the EIS (see Section 7.1.13).

6.1.1 Anticipated Stakeholder and Community Matters

Having regard to the nature and scale of the proposal, the following matters are anticipated to be of particular interest to the community and stakeholders during engagement, and will be considered in the preparation of the EIS:

- Visual and landscape character impacts of the data centre buildings within the rural setting;
- Noise and vibration from mechanical plant, back-up generators and construction activity;
- Traffic and road impacts, including the condition and capacity of Ashfords Road during construction and operation;
- Water demand, water security and any effects on Boiling Down Creek and surrounding agricultural land;
- Loss of agricultural land and potential effects on surrounding rural land uses;
- Bushfire and other hazard risks associated with the development; and
- Employment, investment and other economic benefits to the Wagga Wagga region.

These matters will inform the engagement methodology described in Section 6.3 and will be addressed through the technical assessments accompanying the EIS.

6.2 Engagement Carried Out

Engagement undertaken to date includes:

- Preliminary discussions with electricity network and infrastructure providers regarding servicing, including the adjacent 330kV TransGrid substation;



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- Site investigations and technical studies undertaken by the Proponent and its consultant team;
- Extensive consultation with Wagga Wagga City Council, including multiple in-person and virtual meetings, having regard to Council's ownership of the land and the future use and sale of the Subject Site; and
- Preliminary consultation with Riverina Water regarding water servicing.

Direct engagement with nearby sensitive receivers has not yet commenced; it will be undertaken as part of the community consultation and social impact assessment process described below.

6.3 Engagement to be Carried Out

Engagement to be undertaken prior to and during preparation of the EIS includes pre-lodgement meetings with the Department and key agencies, consultation with Wagga Wagga City Council, infrastructure and service providers, Aboriginal stakeholders, and the local community and surrounding landowners.

A Community and Stakeholder Engagement Outcomes Report will be prepared in accordance with the Department's Undertaking Engagement Guidelines for State Significant Projects (March 2024).

Engagement approach — The Proponent's engagement will be delivered through a Community and Stakeholder Engagement Strategy built on a continuous, two-way rhythm of engagement rather than a single consultation event. Engagement will be prioritised toward those most affected, in particular the small number of rural dwellings in the vicinity of the Subject Site, including the dwelling on Ashfords Road, while ensuring the broader community is engaged at each project milestone. The Strategy applies the IAP2 public participation spectrum to match the level of engagement to each audience, as summarised in **Table 11**.

Table 11. Stakeholders and level of engagement (IAP2)		
Audience	IAP2 level	What this means in practice
Near neighbours	Involve	Their concerns directly shape mitigation design — screening, lighting, noise treatment, and construction traffic and hours.
Wagga Wagga City Council	Collaborate	Joint design of the benefits program and of the engagement approach itself.
WWLALC and Wiradjuri Elders	Collaborate	Cultural heritage process and economic participation designed together, not consulted upon.
Charles Sturt University, TAFE NSW and business	Collaborate	Co-design of the skills pipeline and the local procurement approach.
General community	Consult	A genuine opportunity to raise concerns that inform the application and the benefits program.
Broader region and media	Inform	Accurate, timely and accessible information and a responsive point of contact.

Engagement activities and cadence — The Strategy sets a standing program of engagement activities, summarised in **Table 12**. It includes direct, one-to-one engagement with adjacent and nearby landowners, including doorknocks of the Ashfords Road and Redbank Road residents and on-property meetings with surrounding rural landholders so that the concerns of the most affected receivers directly inform the design and mitigation of the proposal. The broader community, Council, First Nations stakeholders, business and education partners, and the surrounding villages are



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engaged through a regular cadence of drop-in sessions, briefings, site and facility tours, forums and open days.

Table 12. Engagement activities and cadence

Activity	Audience	Frequency	Format
Near-neighbour doorknocks	Ashfords Road and Redbank Road residents	Initial round, then at each milestone	In person, one to one
Rural neighbour meetings	Surrounding landholders	Introductory, then quarterly	In person, on property
Community drop-in sessions	General community	Quarterly, and at each milestone	Open house, staffed
CBD pop-up	Passing public	Twice yearly	Staffed stand, Marketplace or Baylis Street
Site tours	Council, neighbours, media, business	On request, minimum quarterly	Guided, on site
Operating facility tours	Council, ministers, community leaders	As required	Guided, operating facility
Council executive catch-ups	General Manager and directors	Monthly	Meeting
Local member briefings	Dr Joe McGirr MP	Monthly	Meeting
First Nations engagement	WWLALC and Wiradjuri Elders	Monthly, then as agreed	On Country, in person
University and TAFE forums	Charles Sturt University, TAFE NSW	Quarterly	Workshop
Business chamber briefings	Chamber, RDA Riverina, suppliers	Quarterly	Briefing and supplier forum
School STEM programs	Local schools and P&C	Termly	In-school program
Village outreach	Uranquinty, Ladysmith, Mangoplah, Tarcutta, Collingullie	Twice yearly	Visiting session at a local venue
Community Liaison Group	Representative membership	Monthly once formed	Structured meeting with minutes
All-stakeholder briefing	Full stakeholder register	Quarterly	Briefing plus written update
Annual open day	General community	Annually	Site open day

Monitoring, review and adaptation — The effectiveness of the engagement program will be monitored, reviewed and adapted throughout the life of the project. Community acceptance will be treated as a key measure at each decision point, with community sentiment and social licence assessed at each stage gate and factored into go / no-go decisions. At each gate, one of four recommendations will be issued, as set out in **Table 13**.



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Table 13. Stage-gate recommendations

Recommendation	Meaning
Proceed	Social-licence risk is acceptable and being managed; continue as planned.
Modify	Proceed with specified changes to approach, design, timing or benefit-sharing to reduce risk.
Pause	Hold at this gate until defined conditions are met, such as Council alignment or sentiment recovery.
Stop	Social-licence risk is unacceptable at this time; do not proceed on the current basis.

The following measures will be used to assess community sentiment and the level of social licence, and to adapt the program over time:

- community sentiment — a baseline established in the first quarter of engagement and then tracked quarterly;
- support and opposition — submissions, public commentary and any organised opposition activity;
- government support — the positions of Council, the local member, and the State and Commonwealth governments;
- engagement volume and quality — meetings held, feedback logged, and response times against a 48-hour commitment;
- commitments made and delivered — tracked as a governed asset, including any conditions of consent; and
- benefit outcomes — employment pathways created, local procurement, initiatives delivered and community participation.

It is recognised that effective engagement with stakeholders and the community will be crucial for designing and delivering the best possible outcome for the Subject Site. The Proponent is committed to engagement with Council, NSW Agencies, the Department, Service providers, Aboriginal Stakeholders, and the community.



7. PROPOSED ASSESSMENT OF IMPACTS

Having regard to the site-specific constraints and sensitivities, a preliminary due diligence has been undertaken to identify the matters requiring further assessment in the EIS, those requiring no further consideration, and the anticipated deliverables.

7.1 Matters Requiring Further Assessment

For each matter identified below, the proposed level of assessment, the relevant government plans, policies and guidelines, the proposed treatment of cumulative impacts and any specific community engagement to be undertaken during the preparation of the EIS are summarised in the Scoping Summary Table at Appendix B. Reflecting the scale of the proposal, the sensitivity of the receiving environment and the matters raised in pre-lodgement consultation, most matters are proposed to be the subject of detailed assessment (as defined in the Department's scoping guidelines), undertaken by suitably qualified and experienced specialists using best-practice methods and in accordance with the relevant NSW guidelines identified for each matter. The proposed approach to each matter has regard to the scale and nature of the likely impacts, the sensitivity of the surrounding rural environment and nearby receivers, the potential for cumulative impacts with other data centre and industrial development in the locality (see Section 7.1.24), and the relevant government plans, policies and guidelines.

7.1.1 Built Form, Architecture and Design

The EIS will be supported by architectural drawings and a Design Report demonstrating the proposed building layout, land uses, GFA, setbacks and site layout and the response to the rural context.

Design quality will be addressed, including built form, materials, screening and landscape treatment to minimise visual and amenity impacts. The data centre sector has grown rapidly with the expansion of cloud computing and artificial intelligence, with data centre capacity across the Asia-Pacific region forecast to increase from approximately 15 gigawatts in 2023 to 27 gigawatts in 2027. Hyperscale data centres, which house many thousands of servers, are substantially more energy efficient than smaller or on-premise facilities, and the scale and built form of the proposal reflect this need for efficient, co-located capacity.

Built form, architecture and design is proposed as a matter for detailed assessment. The principal sensitivity is the visual relationship of a large-footprint industrial building form to the surrounding rural landscape and the nearby rural dwellings. The design response addresses this through a single-storey built form kept low in the landscape, perimeter earth walls and landscape buffers to Boiling Down Creek and the northern boundary. The Design Report will document the design options considered and demonstrate how the proposal minimises amenity impacts having regard to the relevant design guidance, including Better Placed, and the rural context of the site.

7.1.2 Environmental Amenity

The EIS will assess amenity impacts on surrounding receivers, including visual, noise, air quality, lighting and traffic effects during construction and operation.

This is an overarching matter addressed through the visual, noise, air quality, lighting and traffic assessments below, each proposed at a level of assessment proportionate to its potential impact. The key amenity sensitivity is the small number of rural dwellings in the vicinity of the site (see Section 2.3 and Figure 8); the assessments will be undertaken against those existing receivers and reasonably foreseeable future receivers, and the cumulative amenity effects of the campus and other development in the locality will be considered (see Cumulative Impacts below).

7.1.3 Landscape Character and Visual Impact

A Landscape and Visual Impact Assessment, informed by photomontages from key viewpoints, will assess the impact of the proposal on the rural landscape character and visual amenity of the locality.

Visual impact is proposed as a matter for detailed assessment, having regard to the scale of the campus, the open rural character of the locality, and the presence of dwellings and public roads with potential views to the site. A field-verified viewpoint methodology has been adopted, with representative viewpoints from public roads and nearby residences (including Gregadoo Road, Ashfords Road, Ivydale Road and Redbank Road) to be assessed by photomontage for both the construction and operational stages. The assessment will have regard to the mitigating effect of the single-storey built form, the perimeter earth walls and screen planting. Some private viewpoints remain subject to landowner access, and the treatment of private affected areas is being confirmed with the Proponent.

A perimeter earth bund (mound) is also proposed around the site, which, together with landscape screen planting, will assist in screening the development and reducing visual impact on surrounding receivers.

7.1.4 Landscape Design and Security

A Landscape Plan and an Arboricultural Impact Assessment will identify existing vegetation, trees proposed for removal, and proposed landscaping and screen planting. The landscape design will also respond to the security requirements of a data centre, including secure perimeter fencing and gating, controlled entry and exit points, CCTV coverage, secure access to the data halls, and appropriate setback of landscaping to prevent its use to breach security.

This is matter for detailed assessment, addressed through the Landscape Plan and Arboricultural Impact Assessment. The landscape response is directed at screening the development and reinforcing the rural setting while meeting the security requirements of a data centre. It will identify vegetation to be retained and removed, proposed screen planting and canopy outcomes, and will be coordinated with the perimeter earth walls and secure fencing.

7.1.5 Energy, Electricity Infrastructure and Grid Connection

An assessment of electricity demand, supply and grid connection will be prepared, addressing the high-voltage connection to the adjacent 330kV TransGrid substation (approximately 1.3 kilometres to the north), the two on-site substations, back-up power generation (up to 384 diesel generators), the static synchronous compensator (STATCOM), the rooftop solar array and the capacity of the network to service the development.

Given the scale of the load (up to 1.4 GW) and its reliance on the transmission network, this is proposed as a matter for detailed assessment. The assessment will address the capacity of the 330kV network to service the campus, the two on-site substations and incoming connection (the process for which has commenced with TransGrid through Lumea), back-up generation and the STATCOM, together with the renewable energy and storage strategy and the proposal to fund the connection and associated network augmentation. Specific engagement with TransGrid and Essential Energy is proposed.

7.1.6 Traffic, Transport and Access

A Transport and Accessibility Impact Assessment will accompany the EIS, addressing the existing road network, construction and operational traffic, heavy vehicle access, the proposed temporary construction access to Redbank Road via the southern portion of the adjoining Council waste depot land at 132 Ashfords Road (construction period only, with operational access from Ashfords Road), upgrades to Ashfords Road (currently unsealed), and cumulative traffic impacts from other



developments in the locality. The assessment will be prepared having regard to Transport for NSW's Guide to Traffic Generating Developments and in consultation with Transport for NSW and Wagga Wagga City Council regarding the scope and staging of any required road upgrades.

Traffic and transport is proposed as a matter for detailed assessment, having regard to the currently unsealed condition of Ashfords Road, the heavy vehicle movements generated during the earthworks and staged construction of the campus. The assessment will address construction and operational traffic, heavy vehicle access and haul routes, and the scope and staging of any Ashfords Road upgrade, and will be prepared in consultation with Transport for NSW and Council.

7.1.7 Air Quality

An Air Quality Impact Assessment will be prepared in accordance with the relevant EPA policy, addressing emissions from back-up diesel generators (up to 384 units, including scheduled generator testing) and construction dust from the extensive earthworks required, and will identify a methodology to achieve the relevant pollutant emission criteria at the nearest sensitive receivers.

Air quality is proposed as a matter for detailed assessment, given the emissions associated with up to 384 back-up diesel generators (including scheduled testing) and construction dust from the extensive earthworks, and the presence of nearby rural dwellings. The assessment will model construction and operational emissions on a conservative basis and consider cumulative air quality effects with other development in the locality. The regional, non-urban location of the site and its separation from sensitive receivers are relevant to the applicable generator emission standard, which will be confirmed in the assessment.

7.1.8 Noise and Vibration

A Noise and Vibration Impact Assessment will be prepared in accordance with the EPA Noise Policy for Industry, the Interim Construction Noise Guideline and the Road Noise Policy. Baseline noise monitoring will be undertaken to establish project-specific noise trigger levels, and the assessment will model a conservative worst-case operating scenario (for example, all cooling fans and chillers operating at full capacity without the benefit of water-based cooling). Operational noise (including cooling plant, transformers, the substations and back-up generators) together with construction noise and vibration will be assessed against all existing and reasonably foreseeable future sensitive receivers, and the design will be refined to demonstrate compliance.

Noise and vibration is proposed as a matter for detailed assessment, reflecting the continuous operation of cooling plant, transformers, the substations and up to 384 back-up generators against a quiet rural baseline at the nearest dwellings. Preliminary mitigation (perimeter earth walls, acoustic canopies and attenuators to the generators and treatments to the chillers) will be refined and its effectiveness quantified, and the cumulative noise effects of the staged campus and other development in the locality will be considered.

Preliminary mitigation measures identified to date include a perimeter earth bund (mound) around the site to provide a visual barrier, acoustic canopies and attenuators to the back-up generators, and acoustic treatments to the chillers and other plant. These measures will be refined, and their effectiveness quantified, through the Noise and Vibration Impact Assessment.

7.1.9 Contamination, Soils and Agricultural Land

Although the Subject Site is not listed as contaminated land, given the agricultural use a Preliminary Site Investigation (and, as required, a Detailed Site Investigation) will be prepared. The agricultural land capability of the Subject Site, including any Biophysical Strategic Agricultural Land, will also be considered. Investigations will be undertaken having regard to the Contaminated Land Management Guidelines and the National Environment Protection (Assessment of Site Contamination) Measure

1999, and the agricultural land capability assessment will have regard to the Department's Agricultural Impact Statement guidelines.

Contamination is proposed as a detailed assessment and agricultural land as a standard assessment. The long-standing grazing use is not associated with a known contamination legacy, but a Preliminary Site Investigation (and, if warranted, a Detailed Site Investigation) will confirm the position, having regard to the extensive earthworks proposed. The agricultural land capability assessment will confirm whether any Biophysical Strategic Agricultural Land is affected and the significance of the land relative to the region's agricultural resource.

7.1.10 Geotechnical and Groundwater

A geotechnical investigation and groundwater assessment will be prepared to characterise subsoil and groundwater conditions and inform the design of foundations, earthworks and drainage. The assessment will include a review of available groundwater bore data (including the NSW Government's groundwater and bore databases) and will address any implications for salinity and dryland groundwater management relevant to the Riverina region.

This is proposed as a standard assessment. The impacts are well understood and capable of being managed through standard design measures. The investigation will characterise subsoil and groundwater conditions to inform foundations, earthworks and drainage, and will address salinity and dryland groundwater management relevant to the Riverina, drawing on available bore data.

7.1.11 Civil Works and Earthworks

A Civil Works Plan will accompany the EIS, addressing bulk earthworks, cut and fill balance, finished levels, internal and access road layouts, retaining structures, and erosion and sediment control, having regard to the site topography and the crossing of Boiling Down Creek.

This is proposed as a detailed assessment. Given the size of the development pad and the site topography, the Civil Works Plan will address the bulk earthworks and cut and fill balance (with the objective of balancing earthworks on site so far as practicable), finished levels, the crossing of Boiling Down Creek, retaining structures and erosion and sediment control.

7.1.12 Integrated Water Management and Flooding

An Integrated Water Management Plan will address water supply and demand (including for cooling), stormwater drainage, water quality and water sensitive design. As the Subject Site is mapped as flood affected (Major Overland Flow Flood Study 2021 / Special Flood Consideration area) and is traversed by Boiling Down Creek, a Flood Impact Assessment prepared by a flood specialist will accompany the EIS. The Flood Impact Assessment will be prepared having regard to the NSW Floodplain Development Manual and Council's adopted flood planning controls, and any controlled activities associated with the crossing of Boiling Down Creek will be assessed having regard to the NSW Guidelines for Controlled Activities on Waterfront Land. The stormwater and water sensitive design elements will have regard to relevant water sensitive urban design guidance.

Flooding and integrated water management is proposed as a matter for detailed assessment, having regard to the mapped flood affectation (Major Overland Flow Flood Study 2021 / Special Flood Consideration area) and the presence of Boiling Down Creek through the site. The campus development pad has been located west of the creek to set the principal built form back from the flood affectation and mapped Biodiversity Values. The Flood Impact Assessment will assess flood behaviour up to and including the probable maximum flood, any change to flood behaviour on and off site, finished floor levels and mitigation, and the water balance will address supply, demand and a cooling strategy directed at minimising potable water use.

7.1.13 Infrastructure Servicing, Delivery and Staging

An Infrastructure Servicing, Delivery and Staging Plan will assess the augmentation of existing utilities and the proposed staging, having regard to the absence of existing sewer, water, gas and telecommunications connections to the Subject Site. Electricity servicing will include an incoming high-voltage connection from the adjacent 330kV TransGrid network, on-site campus substations and electrical switching station, back-up generators and a static synchronous compensator (STATCOM). Potable and cooling water supply, wastewater servicing and telecommunications connections will be confirmed with the relevant service providers.

This is proposed as a standard assessment, reflecting the absence of existing reticulated servicing to the site and the staged delivery of the campus. The plan will address the augmentation required for electricity, water, sewer and telecommunications (including the potable water supply extension from Riverina Water's network and an on-site wastewater solution, Council having advised that connection to its reticulated sewer is not feasible), the coordination and funding of upgrades, and the staging of the campus over time, in engagement with the relevant service providers.

7.1.14 Ecologically Sustainable Development and Greenhouse Gas

An ESD Report will be prepared consistent with the principles of ecologically sustainable development, addressing the Sustainable Buildings SEPP 2022, energy and water efficiency and greenhouse gas emissions. The proposal will target best-practice Power Usage Effectiveness (PUE) and Water Usage Effectiveness (WUE), and will be accompanied by a NABERS Embodied Emissions Materials Form addressing embodied and operational emissions. The ESD Report will document the design measures proposed to achieve these outcomes and will be prepared having regard to the Sustainable Buildings SEPP 2022 Design Guide and applicable NABERS methodologies.

This is proposed as a detailed assessment given the energy and water intensity of the campus. The ESD Report will address best-practice PUE and WUE targets, the renewable energy and storage strategy and the commitment to match operational demand with NSW-based renewable supply, and a greenhouse gas assessment prepared having regard to the NSW Guide for Large Emitters will address construction and operational emissions, supported by a NABERS Embodied Emissions Materials Form.

7.1.15 Biodiversity

Given the mapped Biodiversity Values along Boiling Down Creek and the remnant native vegetation, a Biodiversity Development Assessment Report (BDAR) will be prepared in accordance with clause 7.9 of the Biodiversity Conservation Act 2016 (unless determined not required), addressing native vegetation, threatened species and habitat, and any offset requirements.

Biodiversity is proposed as a matter for detailed assessment, having regard to the mapped Biodiversity Values and riparian corridor along Boiling Down Creek and the remnant native vegetation on the site. The BDAR will be supported by an Aquatic and Riparian Impact Assessment and an Arboricultural Impact Assessment, and a dam dewatering plan having regard to the approximately 12 existing dams. An EPBC Act referral is not currently anticipated but will be confirmed through the biodiversity and heritage assessments.

7.1.16 Aboriginal and Non-Aboriginal Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR), including consultation with the registered Aboriginal parties, will be prepared (noting no Aboriginal artefacts are currently recorded on the AHIMS), together with an assessment of historic (non-Aboriginal) heritage. The ACHAR will be prepared in accordance with the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW and the Aboriginal Cultural Heritage Consultation Requirements for

Proponents, and will include consultation with the Wiradjuri Traditional Custodians and registered Aboriginal parties throughout the assessment process.

Heritage is proposed as a matter for detailed assessment. Although no Aboriginal objects are currently recorded on AHIMS, the ACHAR will include survey and, where required, test excavation, informed by continuous consultation with the Wiradjuri Traditional Custodians and registered Aboriginal parties in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents. Historic (non-Aboriginal) heritage will be addressed through a Statement of Heritage Impact and archaeological assessment. Specific community engagement with Aboriginal stakeholders is proposed.

7.1.17 Social and Economic Impact

A Social Impact Assessment and an Economic Impact Assessment will address the social and economic effects of the proposal, including employment, investment and benefits to the regional economy, and potential support through the Investment Delivery Authority. The Social Impact Assessment will be prepared in accordance with the Department's Social Impact Assessment Guideline for State Significant Projects, and will define the social locality, establish a socio-economic baseline for the Wagga Wagga area, and assess construction and operational impacts on the local community.

Social and economic impact is proposed as a matter for detailed assessment, given the scale of the investment (approximately \$15 billion), the construction and operational workforce, and the potential effects on the Wagga Wagga housing and accommodation market. The Social Impact Assessment will be informed by specific community engagement, including with surrounding landowners, and the Economic Impact Assessment will quantify investment, employment and regional benefit.

7.1.18 Contributions and Public Benefit

The proposal represents a significant capital investment in regional NSW (estimated at approximately \$15 billion, comprising the data centre campus and associated infrastructure) and will generate construction and ongoing operational employment. Development contributions will be payable, including under the Wagga Wagga Local Infrastructure Contributions Plan 2019–2034. The need for a Voluntary Planning Agreement will be confirmed and, if applicable, identified in the EIS.

This is proposed as a standard matter. Development contributions will be addressed (including under the Wagga Wagga Local Infrastructure Contributions Plan 2019–2034 and the NSW Housing and Productivity Contribution), the need for a Voluntary Planning Agreement will be confirmed, and any community benefit-sharing program, which sits outside the development application, consistent with the NSW Data Centre Guidelines, will be developed in consultation with Council and the community.

7.1.19 Hazards, Risk and Bushfire

As the entire Subject Site is mapped as bush fire prone land, a Bushfire Assessment addressing Planning for Bush Fire Protection 2019 will be prepared. A preliminary risk screening and, if required, a Preliminary Hazard Analysis will address the storage of dangerous goods. An Environment Protection Licence will be required under the Protection of the Environment Operations Act 1997, as the volume of diesel stored on site (associated with up to 384 back-up generators) is estimated at up to approximately 6,400 tonnes, which exceeds the 2,000-tonne threshold. An EPL assessment will accompany the EIS to confirm the position. The assessment will also address any lithium-ion battery energy storage.

Hazards and risk is proposed as a matter for detailed assessment, having regard to the storage of up to approximately 6,400 tonnes of diesel, the up to 384 back-up generators, any lithium-ion battery storage, and the mapping of the entire site as bush fire prone land. A preliminary risk screening and,

where indicated, a Preliminary Hazard Analysis will address the dangerous goods, and an Environment Protection Licence assessment will confirm the licensing position (an EPL being likely to be required at the proposed diesel volume). The Bushfire Assessment will address Planning for Bush Fire Protection 2019, including asset protection zones, access and emergency management.

7.1.20 Stakeholder and Community Engagement

A Community and Stakeholder Engagement Outcomes Report will document the engagement undertaken, the issues raised and how they have been addressed.

Reflecting the scale of the campus and the level of community interest anticipated, specific engagement will be undertaken with surrounding landowners and the nearest sensitive receivers (noting that direct engagement with receivers has not yet commenced), with Council and agencies, and with Aboriginal stakeholders. The effectiveness of that engagement will be monitored and adapted over time, with the outcomes reported in the Community and Stakeholder Engagement Outcomes Report.

7.1.21 Land Use Compatibility

The EIS will assess the compatibility of the proposed data centre with the surrounding rural and agricultural land uses, having regard to potential interface issues such as visual and landscape impacts, noise, dust and the separation distances to existing agricultural operations and rural dwellings. The assessment will confirm that appropriate setbacks, buffers and design measures avoid land use conflict with the continuing agricultural use of surrounding land.

Land use compatibility is proposed as a matter for detailed assessment, having regard to the introduction of a large industrial land use into a rural setting and the proximity of continuing agricultural operations and rural dwellings. The assessment will confirm that setbacks, buffers and design measures (including the perimeter earth walls and separation distances) avoid land use conflict, and will have regard to the site-specific additional permitted use proposed through the Planning Proposal.

7.1.22 Waste and Resource Management

A Waste Management Plan will be prepared addressing the classification, storage, handling and disposal of construction and operational waste streams (including e-waste), and identifying opportunities to avoid, reuse and recycle waste, consistent with the NSW Waste and Sustainable Materials Strategy 2041 and the Waste Classification Guidelines.

This is proposed as a standard matter, having regard to the extensive earthworks and the construction and operational waste streams of a campus of this scale. The Waste Management Plan will address waste avoidance, classification, storage, handling, reuse and disposal, and the management of e-waste.

7.1.23 Human Health

An Environmental Health Risk Assessment, and where warranted a Health Impact Assessment, will be prepared in accordance with the relevant enHealth guidance. Drawing on the air quality, noise and hazard assessments, it will address the potential human health effects of the development on surrounding receivers, including air emissions, environmental noise and the urban heat island effect.

Human health is proposed as a detailed matter, drawing together the air quality, noise and hazard assessments to consider the potential health effects of the development on surrounding receivers, having regard to the enHealth guidance. Given the separation of the site from concentrations of population, the principal health pathways relate to the nearest rural dwellings.

7.1.24 Cumulative Impacts

The Gregadoo locality is attracting increasing interest for data centre and industrial development, having regard to its proximity to the existing 330kV TransGrid substation and the broader Wagga Wagga industrial and waste management precinct to the north of the Subject Site. The EIS will identify other approved, proposed or reasonably foreseeable developments in the locality (including other data centre proposals) and will assess the potential for cumulative impacts on traffic, electricity network capacity, water and other infrastructure, visual amenity and the amenity of surrounding land uses, in consultation with Wagga Wagga City Council and relevant State agencies.

Cumulative impact assessment is proposed at a detailed level, consistent with the Department's Cumulative Impact Assessment Guidelines for State Significant Projects. The Department's guidance on the developments to be included in the assessment, and the assumptions to be adopted for those not yet lodged, is welcomed.

At a high level, this will consider the combined impacts of the staged campus together with other relevant proposed and approved development in the locality, having regard to visual impact, noise, air emissions, water and electricity demand, traffic, infrastructure capacity and impacts on nearby receivers, consistent with the Department's Cumulative Impact Assessment Guidelines for State Significant Projects. This assessment will be progressed as the design and staging of the campus are developed and reported in the EIS.

7.2 Matters Requiring No Further Consideration

7.2.1 Coastal and Marine Environment

The Subject Site is located inland and is not affected by coastal or marine environments. No further consideration is required.

7.2.2 Aviation (Airspace Protection)

Having regard to its location, the Subject Site is not affected by the Obstacle Limitation Surface or PANS-OPS of Wagga Wagga Airport. Therefore, no further consideration is required.

7.3 Anticipated Deliverables

To assist in informing the SEARs, the following are the anticipated deliverables to support the EIS and concurrent PP:

- Environmental Impact Statement
- Planning Proposal report and draft LEP amendment
- Architectural drawings and Design Report
- BCA Compliance and Accessibility Report
- Site Survey
- Landscape Plan, Visual Impact Assessment and Character Assessment
- Energy, Electricity Infrastructure and Grid Connection Report
- Traffic and Transport Impact Assessment (including Construction Traffic Management Plan and Green Travel Plan)
- Air Quality Impact Assessment
- Noise and Vibration Impact Assessment
- Preliminary Hazard Analysis and Hazardous Materials assessment and Environment Protection Licence assessment
- Bushfire Assessment
- Contamination: Preliminary / Detailed Site Investigation (as required)
- Agricultural Impact Statement and land capability assessment



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- Geotechnical, groundwater and salinity assessment
- Integrated Water Management Plan and Flood Impact Assessment
- Infrastructure Servicing, Delivery and Staging Plan
- ESD Report and greenhouse gas assessment
- Biodiversity Development Assessment Report
- Aboriginal Cultural Heritage Assessment Report
- Statement of Heritage Impact and Archaeological Assessment
- Social Impact Assessment
- Economic Impact Assessment
- Waste Management Plan
- Estimated Development Cost Report
- Civil Works Plan (bulk earthworks and cut/fill)
- Arboricultural Impact Assessment
- Aquatic and Riparian Impact Assessment
- Dam dewatering plan
- Lighting impact assessment
- NABERS Embodied Emissions Materials Form
- On-site sewage assessment
- Community and Stakeholder Engagement Outcomes Report
- Owner's consent



8. CONCLUSION

This Scoping Report has been prepared to request Project-Specific SEARs for a combined Planning Proposal and State Significant Development Application for a hyperscale data centre at 216 Ashfords Road, Gregadoo.

The report has outlined preliminary information regarding the Subject Site and the proposal, identified the relevant strategic and statutory context, and identified the matters proposed to be assessed in the EIS and concurrent PP.

In summary, the EIS to be prepared for the SSDA is proposed to address:

- A full description of the proposed development, including the built form, land uses, gross floor area and supporting infrastructure;
- An assessment of the likely environmental, social and economic impacts of the development during construction and operation, including the matters identified in Section 7 of this Scoping Report;
- The proposed mitigation and management measures to avoid, minimise and manage identified impacts;
- The outcomes of engagement undertaken with the community, Council, State agencies and other stakeholders, and how issues raised have been addressed; and
- The justification for the proposed development, including its strategic and statutory planning merit and its consistency with the objects of the EP&A Act.

The proposal would be delivered through a concurrent Planning Proposal and State Significant Development Application under section 4.38(5) of the EP&A Act. The Planning Proposal seeks a site-specific additional permitted use for a data centre applying to the whole of the Subject Site under Schedule 1 of the Wagga Wagga LEP, with the RU1 Primary Production zoning and existing development standards retained. This limited amendment enables only a data centre across the landholding, rather than the broad range of uses that a rezoning to a general industrial zone would permit, providing certainty of outcome, while built development would be concentrated within the developable footprint and the balance of the site retained for continued rural use.

The Subject Site is strategically well suited to the proposed use. It adjoins an established cluster of utility and waste management uses, has direct access to the 330kV electricity transmission network, and is separated from sensitive land uses on the rural fringe of Wagga Wagga. The proposal responds to State and regional strategic planning including the NSW Data Centre Guidelines and the Statewide Policy for Industrial Lands and would deliver significant capital investment, construction and operational employment, and critical digital infrastructure for the region.

Engagement will be undertaken through a comprehensive, two-way Community and Stakeholder Engagement Strategy that prioritises the most affected receivers including direct engagement with adjacent landowners and that monitors, reviews and adapts its approach at each stage of the project, as described in Section 6.

The EIS will assess each matter at the level of assessment identified in Section 7 and summarised in the scoping summary table at Appendix B, having regard to the scale and nature of the likely impacts, the sensitivity of the surrounding rural setting and nearby receivers, the potential for cumulative impacts including the future data centre buildings and the relevant government plans, policies and guidelines.

We trust that the information detailed in this report is sufficient to enable the Secretary to issue Project-Specific SEARs for the preparation of the EIS. Should you require further information, please contact Willowtree Planning.



REFERENCES

The following key legislation, policies and guidelines have been referred to in the preparation of this Scoping Report and will inform the technical studies accompanying the EIS.

- Environmental Planning and Assessment Act 1979 (NSW)
- Environmental Planning and Assessment Regulation 2021 (NSW)
- Environment Protection and Biodiversity Conservation Act 1999 (Cth)
- Biodiversity Conservation Act 2016 (NSW)
- Protection of the Environment Operations Act 1997 (NSW)
- Water Management Act 2000 (NSW)
- Rural Fires Act 1997 (NSW)
- State Environmental Planning Policy (Planning Systems) 2021 (NSW)
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (NSW)
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (NSW)
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- Wagga Wagga Local Environmental Plan 2010 (NSW)
- Riverina Murray Regional Plan 2041, NSW Government
- Wagga Wagga Local Strategic Planning Statement, Wagga Wagga City Council
- Planning for Bush Fire Protection 2019, NSW Rural Fire Service
- Noise Policy for Industry, NSW Environment Protection Authority
- Interim Construction Noise Guideline, NSW Environment Protection Authority
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- Guide to Traffic Generating Developments, Transport for NSW
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- Contaminated Land Management Guidelines, NSW Environment Protection Authority
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW, Heritage NSW
- Social Impact Assessment Guideline for State Significant Projects, Department of Planning, Housing and Infrastructure
- State significant development guidelines – preparing a scoping report, Department of Planning, Housing and Infrastructure
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