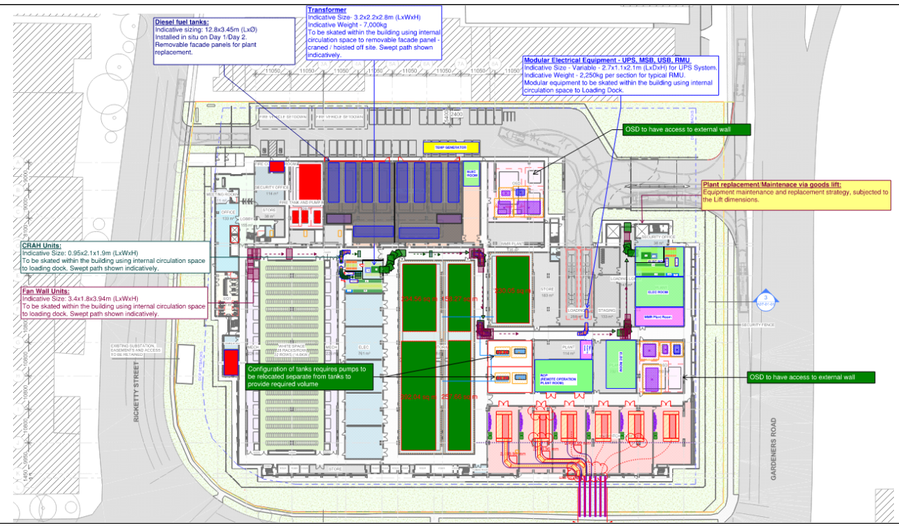
Appendix A - Response to Submissions Table

Date 4/09/2025

Appendix	Document
B	Landscape Plans
C	Landscape Report
D	Architectural Plans
E	Rigging Coordination Study
F	Civil Response Letter

RFI	Response
DPIE Comments	
Tree Species Diversity	
Given the substantial length of the site frontage, a broader mix of tree species should be incorporated to improve visual interest through variation in colour, seasonality, height and crown form. This would help break up the percieved scale of the frontage and enhance both biodiversity and habitat value.	Variation in colour does not align with our connecting to country principles, which prioritises the selection of local Indigenous plant species. However, the current landscape design includes a carefully considered mix of native species to ensure diversity in form and texture including flowering varieties. Plant selection has taken into account appropriate height and crown width and changes to the height of trees will be inconsistent with previous comments for tall screening trees. The species selection has been amended to adress Bayside Councils comments, please refer to **Appendix B** for the updated Landscape Plans.
Recessed Articulation and Façade Treatment	
The amended scheme introduces two recessed elements within the precast panels along the Kend Road frontage, which does reduce the building's bulk and scale. However, the rooftop plant screening devices, as was previously demonstrated in the EIS (Appendix F — Architectural Design Report), have been removed.	Noted
It is recommended that the recessed articulation within the rooftop plant screening be reinstated above the two existing recesses in the precast panels. Consistent with the earlier scheme, the screening elements within thèse recessed areas should utilise a contrasting material or colour to reinforce the articulation strategy and further diminish the visual massing when viewed from the public domain and surrounding residential areas.	Please refer to **Appendix D** for updated Architectural drawings.
In line with SDRP Advice Letter 2 (Item 10a), it is recommended that tonal variation be applied to the precast panels. Currently, all panels are proposed in 'CON-101 Precast Concrète Panel Colour Light & Grey'. Introducing a deeper tone within the recessed areas would strengthen the articulation strategy and improve the overall visual depth and interest of the façade	Please refer to **Appendix D** for updated Architectural drawings.
Water and Wastewater Servicing	
Additional information is required to clarify, in consultation with Sydney Water, which stage(s) of the development can be serviced by the existing water and wastewater infrastructure.	Engagement with Sydney Water is ongoing. The feasibility response from Sydney Water confirms that there is capacity in the system to service the propsoed development however augmentation and upgrades will be required. A new Section 73 application is being prepared for submission to Sydney Water as per the advice.
Please provide a rigging coordination study and plant replacement strategy that demonstrates:	
How rooftop and elevated equipment will be accessed for initial installation and future replacement	The rooftop equipment (Chillers, Cooling Towers, PAHU's and Load Banks) are arranged to ensure that sufficient space between equipment is maintained for all equipment to be moved along the roof space and to the rigging point located on the north west corner of the building. The process of moving the equipment to the rigging location shall not impact the operation of any other equipment. Some equipment such as the PAHU's and Cooling towers may also be broken down into smaller components and assembled/disassembled in its final position. Equipment located on the Gantry (Generators) will be rigged in position through the gantry facade located on the west of the building.
That adequate spatial allowances have been made between equipment to enable safe and efficient rigging operations	As part of the design, equipment selections are generated by the equipment manufacturers according to the sites design and conditions, as part of these selections are the equipment dimensions and weights that represent the planned equipment that will be installed. These equipment dimensions are then translated to representative equipment blocks on the buildings architectural layouts. In this sketch, the equipment block along with spatial provisions for that equipment's maintenance or removal are coordinated for the different building services

	
That crane access and manoeuvrability have been considered in the design of the development	Please refer to **Appendix D** for the crane and rigging coordination study.
This information is necessary to confrim that initial installation and ongoing maintenance requirements have been appropriately addressed.	Noted.
Bayside Council Submission	
Built Form Massing and Aesthetic	
It is acknowledged that the expression of the façade has been developed to provide a more balanced composition with an increased level of articulation through detailed refinement of concrete panels and expression of stairs. Whilst it is noted that large scale trees have been incorporated into the landscaped street setback, the sheer scale and inward-looking nature of the building still presents a largely monolithic presence to Kent Street. Council officers previously recommended that consideration be given to including Aboriginal art or other public art on the façade in line with Council's Public Art Policy. We maintain that this should still be considered to improve the building's aesthetics.	Whilst the value of public art in civic buildings is recognised, the design approach for this project seeks to achieve architectural expression through a strategy that balances the building's presence with thoughtful landscape integration. The design philosophy centres on creating calm and rhythmic expression through tactful architectural moves that draw inspiration from Sydney's industrial heritage. This approach allows the building to contribute meaningfully to Kent Street's urban fabric whilst providing a considered backdrop for the landscaped street setback and mature tree plantings. Rather than decorative façade treatments, this strategy of restrained architectural expression and enhanced landscape setting, creates a more enduring and contextually appropriate response that complements the area's character whilst serving community needs effectively
View loss	
Previously concerns were raised at the Environmental Impact Statement (EIS) stage about view loss for residents on the eastern side of Kent Road and we requested that a more detailed Visual Impact Assessment be undertaken as the limited analysis provided did not fully assess the view impacts. As cited in the RtS, we note the difficulty encountered in gaining access to units to undertake a more comprehensive view loss analysis, however, with limited additional information, our previous comments remain.	Bayside Council acknowledges that access to dwellings was limited, noting letter drops to each building along Kent Road were undertaken by Urbis. A photomontage was provided from the one available unit that could be accessed, and the VIA also provided additional analysis from publicly available information on buildings along Kent Road (real estate photography and floorplans) to provide a high-level assessment of likely view impacts from these locations. In the absence of permission to enter private dwellings a series of CGIs were produced to demonstrate view sharing impacts. The additional analysis originally requested referred to specific items to be assessed (Sydney Park and Sydney CBD) however views directly west from 12 Galloway Street were also produced to demonstrate views from RFBs on Kent Road. The production of additional CGIs at lower levels of residential flat buildings to that produced in CGI View 02 and the photomontage view from the residential dwelling would not provide any additional information on view loss or blocking effects of the proposal in views directly west to that already provided given the continuous elevation of the proposal.
Landscaping	
The following comments are supported by recommended conditions of consent for landscaping, which are included in the enclosed Attachment to this letter.	Goodman accepts a condition of consent.
Planting within the Street Frontage Setback	
The proposed landscape design should include a mix of large canopy trees endemic to the Botany Bay and Mascot area, such as Eucalyptus botryoides (Bangalay), Eucalyptus robusta (Swamp Mahogany), and Melaleuca quinquenervia (Broad-leaved Paperbark). These trees should be carefully positioned to avoid conflicts with driveways, underground services, signage, and any security surveillance zones.	Goodman accepts a condition of consent.

A minimum of two canopy species per frontage is required to avoid monoculture. It is recommended that Melaleuca quinquenervia be included within the landscape setback areas, particularly adjacent to WSUD swales, where its natural tolerance for wet soils will enhance water-sensitive urban design outcomes. Banksia species may be used within the site but not in the public verge. Planting density and arrangement should complement the canopy trees, support visual amenity, and maintain appropriate sightlines, public safety and passive surveillance.	Goodman accepts a condition of consent.
Additional Green Roof and Planting Above Structures	
With an increase in power and presumably a larger heat signature, the inclusion of a green roof should be considered. Additional planting on structure is encouraged to enhance the overall landscape outcome, support biodiversity, and contribute to visual softening of the built form. Where soil depth and structural capacity permit, canopy or screening species should be prioritised. These landscape elements should be designed in accordance with Bayside's Landscape Technical Specification.	A green roof is not feasible for the proposed data centre due to several operational and technical constraints. Firstly, the roof is required to accommodate significant mechanical plant and equipment essential for the building's function. The mechanical plant demands substantial roof space and restrict the opportunity for integrating a green roof. Additionally, the nature of data centre operations necessitates ease of access for maintenance and servicing. Maintenance requirements for vegetation add foot traffic and increase the risk of accidental damage to rooftop infrastructure, while the potential fire risk from dry plant material further complicates safety planning. A green roof would complicate routine inspections and repairs, leading to potential operational inefficiencies and higher maintenance costs.
Stormwater Structures and Deep Soil Zones	
The current plans do not show stormwater infrastructure within deep soil zones. Any final landscape documentation should clearly identify all proposed stormwater systems and confirm they do not interfere with deep soil planting areas.	Goodman accepts a condition of consent.
Public Domain Planting	
Tree retention is generally not required along Kent Road and Ricketty Street, provided new compensatory planting of large endemic canopy trees is undertaken as per the recommended conditions. The Kent Road frontage should also accommodate a minimum 2.5-metre-wide shared path in line with the Bayside's Priority Cycleway Network	Goodman accepts a condition of consent.
On Gardeners Road, new tree planting should be in accordance with the recommended conditions of consent and should be limited to areas where sufficient space exists and is not to impact pedestrian movement or shared path provision.	Goodman accepts a condition of consent.
It is recommended that street tree planting include locally endemic, winter-flowering eucalyptus species such as Eucalyptus botryoides and Eucalyptus robusta, planted at a minimum 200L pot size. Tree placement should accommodate the shared path along Kent Road and avoid conflicts with surveillance zones, driveways, services, and sightlines	Goodman accepts a condition of consent.
All trees approved for removal should be clearly identified on the final landscape and civil drawings, with appropriate offsets provided through new endemic planting within the site or verge. Verge and frontage planting is to be appropriately maintained post-construction and any failed plantings are to be replaced. Street trees must not be planted in sightline clearance areas or in front of road and electronic road signage.	Goodman accepts a condition of consent.
Floodplain Management	
The climate change flood modelling contained in section 8 of the Flood Impact and Risk Assessment (FIRA) does not appear to have been correctly undertaken as per the section 9.5.4 of Bayside Development Control Plan (DCP) 2022 which states:	The impacts of climate change have been undertaken in accordance with DPE's Flood Risk Management Guideline LU01 (2023). This supersedes Council's 2022 DCP requirements.

○ Climate change: • Climate change impact shall be modelled to manage the risk of future climate change on the development proposal for the life of the buildings/structures and to determine the post development flood impact elsewhere in the floodplain. Provide reasoning as to why the works will have no impact on flood levels considering future climate change (less than or equal to 10mm on surrounding properties in the 1% AEP event). ○ The following scenarios shall be modelled: • Scenario 1: Impacts of sea level rise in Year 2050 and 2100. • Scenario 2: Impacts of sea level rise combined with increased rainfall intensity in Year 2050 and 2100.	
It appears to just show the change in flood levels as a result of increasing the rainfall by 19.7% (presented in an afflux map), which is not the assessment required, and instead, it is showing significant non-complaint afflux throughout the catchment, which is not supported. What is required is to model the development in the pre and post development scenario for the following 1% AEP climate change events: i. 1% AEP with sea level rise and, ii. 1% AEP with sea level rise + increased rainfall intensity	The impacts of both rainfall increase and sea level rise have been considered for sensitivity in accordance with DPE's Flood Risk Management Guideline LU01 (2023). The afflux maps show the impact of climate change on flood behaviour (i.e. increases only due to increased rainfall and sea level rise). This is a DPE requirement of LU01 for SSD. Additional assessment of flood impact of the development on existing flood behaviour has been assessed (Section 10) for various storm events up to the PMF. The PMF impact is a considerably larger storm event than the 1% + climate change and flood impacts as a result of development have therefore been fully assessed across the full range of flood events. An afflux map demonstrating the change in flood levels between the pre- and post development 1% AEP climate change scenario is provided in **Appendix F.**
Figure 49 of the FIRA does not clearly show areas with flood afflux less than 50mm and greater than 50mm. The outputs and legend for the PMF flood afflux mapping needs to provide a separate legend for afflux higher/lower than 50mm to clearly indicate compliance.	The afflux maps in Figures 46-49 show that there are no significant impacts in all storm events up to the PMF with notable reduction in flood levels at the intersection of Gardeners Road and Kent Road. There is a very minor localised increase to the south of the development on Ricketty Street, however this is not significant, it is within the designated major system and road reserve, does not affect flood hazard or the level of service of this Road. An amended afflux map with an updated legend (including a 50mm threshold) is provided in **Appendix F.**
Council officers request that the Applicant provides a soft copy of the 2D TUFLOW raster files (results files) for further review prior to determination of the SSD. Adequate justification is also to be provided for the rationale for using 1987 rainfall data rather than 2019 rainfall data.	Depth, level and ZAEM1 asc files for all events were provided to Council via email on 17 July 2025. The FIRA adopted the hydrological inputs from Council's adopted flood model. Updating the model to incorporate ARR2019 design rainfall data would involve significant redevelopment of the hydrological model. Consistency with Council's adopted ARR1987 inputs ensures the assessment aligns with Council's calibrated and endorsed flood modelling framework.
Contaminated Land	
In relation to Contamination, Council requests that following remediation, if a Long Term Environmental Management Plan (LTEMP) is required to manage residual contamination at the site, the LTEMP should be noted on the title (or titles following development) of the property under Section 88B of the Conveyancing Act 1919. A recommended condition has been included in the enclosed Attachment to address this.	Goodman accepts a condiion of consent.
Aircraft Noise Exposure Forecast (ANEF)	
Previously in the submission on EIS, Council officers noted that part of the subject site is located within the 20-25 ANEF Contour and part is located in the 25-30 ANEF Contour and is thus subject to adverse aircraft noise. In the Applicant's RtS, they note that they intend to include appropriate acoustic measures at detailed design stage. It is recommended that appropriate conditions of consent be included to ensure that these are detailed on any construction plans submitted prior to the issue of a Construction Certificate. Draft wording for such a condition has been included in the enclosed Attachment to ensure the office component of the development located in the 25-30 ANEF meets the indoor design sound levels shown in Table 3.3 (Indoor Design Sound Levels for Determination of Aircraft Noise Reduction) in AS 2021:2015 for the office component of the building.	Goodman accepts a condiion of consent.
Amenity Impact	

Council notes the recommendations provided in the amended Air Quality Impact Assessment and Noise and Vibration Impact Assessment prepared by SLR Consulting, dated 27 May 2025 and 16 June 2025 respectively. The Applicant must comply with all monitoring and mitigation measures contained within the afore-mentioned Assessments. Council requests the appropriate mitigation measures related to noise, vibration and air quality are mandated by way of conditions of consent imposed by DPHI.	Goodman accepts a condiion of consent.