Sydney WATER

22 December 2025 **Our reference**: 222659

Jeffrey Peng
Department of Planning, Housing and Infrastructure
jeffrey.peng@planning.nsw.gov.au

RE: Sydney Water input to SEARs for SSD-10167971 at 10 Roberts Road, Eastern Creek (Project Atlas - Goodman)

Thank you for seeking Sydney Water's input on the Secretary's Environmental Assessment Requirements for the **data centre** development proposal at 10 Roberts Road, Eastern Creek. The SSDA will seek consent for the following:

- Site preparation works
- Construction, fit out and 24/7 operation of two data centre buildings with a maximum demand of 500MVA and a total Gross Floor Area of 99,310m^2
- Provision of required plant and utilities
- Vehicular and pedestrian access
- Landscaping and site servicing.

The proponent has previously lodged a Feasibility application with Sydney Water in case number CN222659 and received a Notice of Requirements on 24 June 2025. The proponent is also currently engaging with Sydney Water to enter into a **Planning Agreement** for servicing assessment of the proposed data centres.

Sydney Water requests that the Department of Planning, Housing and Infrastructure include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of the development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (where required) services have been made.
    a. The following information is required:
        i. Staging of developments showing yearly
            1. Average Day Demand
            2. Maximum hour demand (to understand impact on the network during peak hour)
            3. High demand days (e.g. 95th percentile or those high demand 5 to 10 days per year)
            4. Maximum daily demand (Peak day - 1 in 10 year)
        ii. One of the following (for ultimate development as a minimum)
            1. Expected daily usage over a year
            2. Expected monthly average daily usage over a year
            3. Expected daily usage over a year
        iii. Daily diurnal usage based on a high demand day. The preferred usage pattern should reflect the draw from Sydney Waters' mains and not the internal usage. However, understanding the internal water usage can provide insight to Sydney Water on potential draws from the system

and demonstrate that the applicants have leveraged water efficiency opportunities and recycling within their operation as appropriate.

2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. To do this, it is required that the proponent register a direct **Feasibility** enquiry with Sydney Water as soon as possible via an approved Water Servicing Coordinator (WSC) to ascertain servicing needs and to ensure the proposed development is considered in any potential planning that we might be undertaking.
3. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.
4. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.
5. Strict requirements for the protection of Sydney Water's stormwater assets may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets.

Integrated Water Cycle Management (IWCM)

6. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.
7. It is required that the proponent engages directly with Sydney Water via the Feasibility process and discuss IWCM opportunities.

Growth information

Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and investigate staged servicing possibilities, we require the proponent to provide **anticipated ultimate and annual growth data** for this development as outlined in the enclosed Growth Data Form.

A **Feasibility application** will enable a comprehensive servicing review ensuring the proposed development is considered in any potential planning that we might be undertaking. Failure to provide this information may impede proper planning requirements for the proposed development and for the broader area. The completed growth form should be submitted by the proponent to Sydney Water as part of the Feasibility application via a Water Servicing Coordinator (WSC), citing this referral response and our reference number.

Next Steps:

- Given the scale and complexity of the proposed development (or anticipated risk to Sydney Water's assets), further investigations will be required to determine the servicing requirements for this site. It is recommended that a Water Servicing Coordinator is engaged as soon as possible, **and a new Feasibility** application is submitted with Sydney Water **prior to the preparation of the EIS,** to take into account any changes in servicing advice since their previous application.
- Sydney Water is currently in discussions with Goodman to enter into a Planning Agreement to investigate servicing pathways including any additional network amplifications that may be required to service the data centre.
- The proponent should complete and return the enclosed Growth Data Form as part of
- The Department is advised to forward the enclosed *Sydney Water Development Application Information Sheet (for proponent)* to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.

If the proponent has any questions, they should contact Sydney Water Account Manager Danijela Simic at danijela.simic@sydneywater.com.au under their existing case CN222659. Should the Department require further information, please contact the Growth Analytics Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

Kristine Leitch
Manager, Growth Analytics and Strategic Partnerships
Growth and Development
Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- Sydney Water Growth Data Form
- Sydney Water Development Application Information Sheet (for proponent)

Department of Climate Change, Energy, the Environment and Water

Your ref: SSD-101067971
Our ref: DOC25/1034161

Jeffrey Peng
Principal Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

By email: jeffrey.peng@planning.nsw.gov.au

13 January 2026

Subject: SEARs Advice - Project Atlas Data Centre at 10 Roberts Road, Eastern Creek (SSD-101067971) (Blacktown)

Dear Jeffrey,

I refer to the 3 December 2025 request for input from the Conservation Programs, Heritage and Regulation (CPHR) Group of the Department of Climate Change, Energy, the Environment and Water on the Planning Secretary's environmental assessment requirements (SEARs) for the above project.

CPHR has reviewed the *Scoping Report* prepared by Mecone Pty Ltd, Revision 2, dated 27 November 2025 and recommends the proponent address the requirements below and attached.

Biodiversity

In relation to point 4 of the recommended biodiversity environmental assessment requirements, please note the minimum information and spatial data requirements are in Tables 24 to 28 of the Biodiversity Assessment Method 2020 (BAM). Other requirements, such as those relating to the BAM Calculator and Biodiversity Offset Assessment Management System, can be found searching 'guides, tools and databases' at environment.nsw.gov.au.

Please contact Greater Sydney Planning team at Khatera.tokhi@dcceew.nsw.gov.au should you have any queries regarding this advice.

Yours sincerely,

Liza Schaeper

Liza Schaeper

A/Director, Greater Sydney Branch
Regional Delivery
Conservation Programs, Heritage and Regulation Group

CPHR Environmental Assessment Requirements
SEARs request at Project Atlas Data Centre Eastern Creek (SSD-101067971) (Blacktown)

Biodiversity
1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act), the Biodiversity Assessment Method 2020 (BAM) and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the BC Act (s.6.12), *Biodiversity Conservation Regulation 2017* (s.6.8) and the BAM, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations). 2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM. 3. The BDAR must include details of the measures proposed to address the offset obligation as follows: • The total number and classes of biodiversity credits required to be retired for the development/project. • Any proposal to make a payment to the Biodiversity Conservation Fund. 4. The BDAR case is to be submitted to the consent authority by adding 'Greater Sydney – Compliance & Regulation' within the Biodiversity Offsets and Agreement Management System (BOAMS). All digital files associated with the BDAR must be uploaded to BOAMS in accordance with the Biodiversity Assessment Method (BAM). 5. The BDAR must be prepared by a person accredited in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017* under s.6.10 of the BC Act.
Trees and Landscaping
6. An Arboricultural Impact Assessment (AIA) is to be submitted that identifies all trees, including neighbouring trees, that are equal to or greater than five metres in height and have a Tree Protection Zone (TPZ) extending into the proposed development impact area. 7. The AIA is to be prepared by an AQF Level 5 arborist in accordance with Australian Standard AS 4970–2025. 8. The AIA is to clearly demonstrate how viable tree retention has been maximised through the proposal's design process.
Water and soils
9. The EIS must map the following features relevant to water and soils including: • Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map). • Rivers, streams, wetlands, estuaries (as described in s.4.2 of the BAM). • Wetlands as described in s.4.2 of the BAM. • Groundwater. • Groundwater dependent ecosystems. 10. The EIS must describe background conditions for any water resource likely to be affected by the development, including: • Existing surface and groundwater. 11. The EIS must assess the impact of the development on hydrology, including: • Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas. • Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.

- Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).

End of Submission

DOC25/1033848-3

10 December 2025

Jeffrey Peng
Principal Planning Officer
Planning and Assessment Division
Department of Planning, Housing and Infrastructure

Uploaded to the Major Projects Portal

EPA's Recommended Secretary's Environmental Assessment Requirements – Project Atlas Data Centre – SSD-101067971

Dear Jeffrey

I am writing in response to your request for the NSW Environment Protection Authority's (EPA's) Secretary's Environmental Assessment Requirements (SEARs) for the proposed Project Atlas Data Centre located at 10 Roberts Road, Eastern Creek (SSD-101067971).

The EPA has reviewed the following documents:

- *Scoping Report - Project Atlas* (Rev2) prepared by Mecone Group Pty Ltd in November 2025.

The EPA understands the proposal is for:

- Construction and operation of a 500 Megavolt-Ampere (MVA) Data Centre that will have 246 low voltage onsite emergency generators and diesel storage tanks to hold approximately 3,000 tonnes of diesel.

The EPA has considered the details of the proposal and provides the recommended SEARs as **Attachment A**. In carrying out the assessment, the proponent should refer to the relevant guidelines listed, as well as any relevant industry codes of practice and best practice management guidelines.

The Proponent should be made aware that any commitments made in the environmental assessment may be formalised as approval conditions and may also be placed as formal licence conditions. Consistent with Part 9.4 of the Protection of the Environment Operations Act 1997 the EPA may require the provision of a financial assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of the licence.

If you have any questions about this request, please contact Jenny Gustafson via email at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely

Christie Jackson
Unit Head – Environment Protection Planning
NSW Environment Protection Authority

ATTACHMENT A

NSW EPA's Recommended Secretary's Environmental Assessment Requirements for Project Atlas Data Centre – SSD-101067971

1. Environmental impacts of the project

1.1. The description should include the following for both the construction and operation of the project:

a. Details of the premises covered by the project including any relationship with any existing Environment Protection Licences

b. the layout of all the physical elements of the project within the project area, including all buildings, structures, works, haulage activities, pollution controls, stockpile and material handling areas, sealed and unsealed areas, landscaping and open space.

c. all mitigation measures that will be built into the physical layout and design of the project (such as noise walls)

d. any ancillary infrastructure for which approval is being sought (such as upgrades to utilities or surrounding roads)

e. identify those components of the physical layout and design that may change during the detailed design of the project, and set clear limits within which this change may occur without requiring amendments to the DA or modifications to the development consent if the project is approved

f. plans showing the layout and design in plan-view and cross section.

1.2. Identify any likely interactions between the development and any existing/approved developments and land uses in the area.

1.3. Identify all sensitive receivers likely to be affected by the development using clear maps/plans, including key landform areas, such as conservation areas and waterways.

1.4. Identify all potential environmental emissions, assess the likely environmental impacts, and describe the proposed mitigation measures to minimise environmental pollution to achieve compliance with relevant environmental legislation, policies, and guidelines.

1.5. The EIS must accurately summarise the key findings of the detailed technical studies in the appendices of the EIS and use suitable cross-referencing to reduce repetition between the two parts of the EIS.

2. EPA Licensing and Approval Requirements

2.1. Identify all approvals and licences required under environment protection legislation including details of all scheduled activities under schedule 1 of the *Protection of the Environment Operations Act 1997.*

2.2. Outline how the proposal and its environmental protection measures would be implemented and managed so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).

3. Construction Works

3.1. The EIS must include detail of the construction works including:

a. any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site).

b. Identify, characterise and classify the following in accordance with the EPA's *Waste Classification Guidelines (2014)*:

   i. all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste;

   ii. all waste that is to be removed to an offsite location, including proposed quantities. Include the commitment to ensure this waste is taken to a facility that can lawfully receive it.

   Note: The EPA's W*aste Classification Guidelines (2014)* are available at: https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste

c. construction timetable and staging; hours of construction; proposed construction methods.

d. environment protection measures, including noise mitigation measures - in accordance with the Interim Construction Noise Guideline (DECC, 2009), dust control measures and erosion, and sediment control measures- in accordance with Managing urban stormwater: Soils and construction, vol. 1 (Landcom 2004).

3.2. Include a site diagram showing the site layout and location of environmental controls.

3.3. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline (*DECC, 2009). These are available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise

4. Air issues

4.1. The EIS must demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the POEO Act and the *Protection of the Environment Operations (Clean Air) Regulation 2022*. This consideration should include section 129 of the POEO Act concerning control of "offensive odour".

4.2. The EIS must include an air quality impact assessment (AQIA). The AQIA must be carried out in accordance with the document, *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022). These are available at: https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/approved-methods-for-the-modelling-and-assessment-of-air-pollutants

4.3. The EIS must detail emission control techniques/practices that will be employed at the site and identify how the proposed control techniques/practices will meet the requirements of the POEO Act, *POEO (Clean Air) Regulation* (2022) and criteria within *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022).

5. Noise and Vibration

The EIS must assess the following noise and vibration aspects of the proposed development:

5.1. Operational and construction activities on the premises that maybe considered vibration intensive should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006). These are available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration

5.2. If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990). These are available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise

5.3. Operational noise from noise intensive activities to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Noise Policy for Industry* (EPA, 2017).

Available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)

5.4. If applicable, noise on public roads from increased road traffic generated by land use developments other than road projects should be assessed using the guidelines contained in the *NSW Road Noise Policy* (EPA, 2011) and associated application notes. Available at: https://www.epa.nsw.gov.au/your-environment/noise/transport-noise.

5.5. If applicable, noise on rail lines from increased rail traffic generated by land-use developments other than rail projects should be assessed using the guidelines contained in the *Rail Infrastructure Noise Guideline* (EPA, 2013) and associated application notes. Available at: https://www.epa.nsw.gov.au/your-environment/noise/transport-noise.

6. Waste, chemicals and hazardous materials and radiation

The EIS must assess the following waste, chemical and hazardous materials related aspects of the proposed development:

6.1. Assess and describe all aspects of waste generation, management and disposal associated with the proposed development.

6.2. Demonstrate compliance with all regulatory requirements outlined in the POEO Act and associated waste regulations.

6.3. Outline contingency plans for any event that may result in environmental harm, such as excessive stockpiling of material, or dirty water volumes exceeding the storage capacity available on-site.

6.4. Demonstrate that appropriate spill containment will be provided for storage, filling and loading of all fuels and other chemicals to be used on site, in accordance with all relevant Australian Standards, and/or NSW EPA's *Storing and Handling of Liquids: Environment Protection-Participants Manual* (DECC, 2007).

6.5. Demonstrate compliance with Part 9.3E of the POEO Act for the use of any industrial chemicals, including details of activities involving Schedule 6 or Schedule 7 chemicals listed on the IChEMS register. Additionally, demonstrate a system for periodic review to ensure that any new IChEMS Register requirements are incorporated.

6.6. Assess and describe any potential risks relating to all known and potential contaminants of concern (CoC) including per- and polyfluoroalkyl substances (PFAS) that may be associated with the proposed development and if applicable, how they will be mitigated. Consideration should be given to potential health and environment related impacts caused by the CoC. The assessment should consider various sources, receptors and exposure pathways including but not limited to ingestion (drinking water and food consumption), inhalation, and dermal contact.

6.7. Identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027.* Available at: https://www.epa.nsw.gov.au/Your-environment/Recycling-and-reuse/Strategic-direction-for-waste-in-NSW/Waste-and-Sustainable-Materials-Strategy.

7. Deisel Generator Testing Regime

Outline the proposed testing regime for back-up generators, and provide detailed information regarding:

- All testing types (e.g. monthly, annual) and details of scheduled and unscheduled works that would require use of back-up diesel generators (e.g. electrical infrastructure works),
- Number of tests for each generator/year,
- Number of generators to be tested at any one time,

- Testing duration for each generator (including cool down),
- Load during testing,
- Time of the day testing will occur,
- Maximum number of tests per day,
- Total number of cumulative hours generators will be tested and operated per annum.

8. Battery Energy Storage Systems (BESS)

8.1. For data centres that include forms of Battery Energy Storage Systems (BESS), proposals should include details about the amount of waste batteries proposed to be stored on the premises at any one time and appropriate fire management measures proposed, including separation and storage of any contaminated fire-fighting water.

9. Water

The EIS surface water quality assessment must:

9.1. Demonstrate that all practical measures to prevent, control, abate or mitigate water pollution have been implemented, including a description of options that were explored (such as reuse to avoid a discharge or treatment).

9.2. Provide details of the proposal that are essential for predicting and assessing potential impacts to receiving waters. This could include (but is not limited to):

a. Site layout, including details of the existing and proposed water management system.

b. Drainage map for the entire site identifying sub-catchments, flow paths, drainage infrastructure, design sizing of structures, water storages, discharge points, and any potential flow paths to receiving waters.

c. How stormwater will be managed in all phases of the project. Information should include, where appropriate, measures to avoid or minimise erosion, leachate generation, and sediment mobilisation at the site.

d. Any in-water activities (such as piling or dredging).

9.3. Include water balance(s) for ground and surface water, including any intake and discharge locations, volumes, frequency and duration.

9.4. Identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point, including residual discharges after mitigation measures are implemented. This should be undertaken for construction and operational phases.

9.5. Include a water pollution impact assessment undertaken consistent with the guidance available at https://www.epa.nsw.gov.au/your-environment/water/managing-water-pollution-in-nsw/environment-protection-licensing/water-pollution-discharge-assessments. The level of assessment should be commensurate with the risk to the environment and human health.

9.6. Describe any surface water quality monitoring programs, including proposed monitoring locations, frequency and indicators of surface water quality. Analytical limits of reporting should have regard to any identified guideline values. Water quality monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutants in NSW* (2004) available at: Approved methods for the sampling and analysis of water pollutants in NSW | EPA

9.7. The EIS must describe how stormwater will be managed in all phases of the project, including details of how stormwater and runoff will be managed to minimise pollution. Information should include measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site. The EIS should consider the guidelines *Managing urban stormwater: soils and construction,* vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC, 2008).

10. Groundwater

10.1. Provide details of the project that are essential for predicting and assessing impacts to groundwater with a description of the existing environment, including:

a. Geological, topographical, and hydrogeological resource descriptions, maps, and cross-sections.

b. Assessment of groundwater quality, users of groundwater, existing bores including depths and construction, assessment of local land use.

c. A hydrogeological interpretation of water-bearing geological units, depth to water table, groundwater gradient, Conceptual hydrogeological model, assessment of groundwater dependent ecosystems.

d. Site map and cross-sections showing and characterising any proposed excavations and spoil emplacement (relative to water table) with topography.

e. Proposed groundwater monitoring program.

11. Soils

11.1. The EIS should include an assessment of the potential impacts on soil and land resources should be undertaken, being guided by the *Soil and Landscape Issues in Environmental Impact Assessment* (DLWC 2000). The nature and extent of any significant impacts should be identified. Particular attention should be given to:

a. Soil erosion and sediment transport- in accordance with *Managing urban stormwater: Soils and construction, vol. 1* (Landcom 2004) and vol. 2 (A. Installation of services; B Waste landfills; C Unsealed Roads; D Main Roles) (DECC2008).

b. Mass movement (landslides) – in accordance with *Landslide risk management guidelines* presented in *the Australian Geomechanics Society* (2007).

c. Urban and regional salinity – guidance given in the *Local Government Salinity Initiative* booklets which includes *Site Investigation for Urban Salinity* (DLWC, 2002).

11.2. A description of the mitigation and management options that will be used to prevent, control, abate or minimise identified soil and land resource impacts associated with the project. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented. Where required, add any specific assessment requirements relevant to the project.

12. Contamination

12.1. Identify the likelihood of contamination at the site and surrounding land (on different media such as soils, groundwater, ground gas, surface water and sediments, where applicable) by considering the context of past, current, and proposed land uses. The EIS must document how the assessment of contaminated land has been undertaken with regard to the relevant guidelines for contaminated land made or approved by the NSW EPA.

12.2. All reports on contamination must be prepared by a suitably qualified contaminated land consultant(1) who is also certified(2).

(1) A suitably qualified and experienced contaminated land consultant is a contaminated land consultant who meets the competencies outlined in the Guideline on the Competencies and Acceptance of Environmental Auditors and Related Professionals (Schedule B9) as provided in the ASC National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended in 2013)."

(2) A certified consultant is a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme;

Note: If an auditor is being engaged for the project, the requirement for a certified consultant to prepare the contaminated land reports is still recommended as it will help ensure all assessment work is done as efficiently as possible, but it is optional. However, it must still be required for all reports to be prepared by a suitably qualified contaminated land consultant.

12.3. Where contamination is considered likely based on past or current land uses or other factors (such as offsite contamination migrating onto the site), undertake detailed site investigation/s to determine the nature and extent of the contamination.

12.4. Where contamination exists, assess if remediation of the land is required, having regard to current and future land uses; and the ecological and human health risks posed by the contamination to both onsite and offsite receptors.

12.5. Where a detailed site investigation is prepared and/or remediation is considered necessary, a NSW EPA accredited Site Auditor must be engaged to undertake an audit. The EIS must include copies of any Interim Audit Advice provided by the auditor and a Site Audit Statement and Site Audit Reports issued by the auditor which certifies the site can be made suitable for the proposed use

12.6. The following references should be included as relevant guidelines that must be followed when assessing contaminated land:

a. *Managing Land Contamination: Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA, 1998) - https://www.epa.nsw.gov.au/sites/default/files/managing-contaminated-land-guidelines-remediation.pdf*

b. *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997 (EPA, 2015)*

c. *Contaminated land sampling design guidelines - Part 1 and 2 (EPA, 2022)*

d. *Consultants reporting on contaminated land: contaminated land guidelines (EPA, 2020)*

e. *Guidelines for the NSW Site Auditor scheme 3rd edition (EPA, 2017)*

f. Any other relevant guidelines made or approved by the EPA under s105 of the *Contaminated Land Management Act 1997 - https://www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines*

13. Climate Change

13.1. Provide estimate of greenhouse gas (GHG) emissions for the project by carrying out a Greenhouse Gas Assessment consistent with the most recent version of the EPA's Greenhouse Gas Assessment Guide for Large Emitters (GHG guide) that is available on the EPA's website. The GHG estimate is to confirm if the project is likely to result in 25,000 tonnes or more of scope 1 and 2 emissions (CO2-e), in any financial year during the operational life of the project. Input data and assumptions used to estimate GHG should be accompanied by supporting evidence.

Note: Where the proponent believes that certain requirements from the GHG guide are not applicable, the proponent may indicate that in the EIS but must provide sufficient justification.

File Ref. No: FRN25/3750 BFS25/8763 8000047086
TRIM Doc. No: D25/148154
Contact: Senior Firefighter Sarah Tobin

9 December 2025

JEFFREY PENG
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Jeffrey,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – PROJECT ATLAS DATA CENTRE – 10 ROBERTS RD, EASTERN CREEK NSW 2766 (SSD-101067971).

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 3 December 2025, requesting input into the preparation of the SEARs for the PROJECT ATLAS DATA CENTRE – 10 ROBERTS RD, EASTERN CREEK NSW 2766 (SSD-101067971). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Section 6.2).

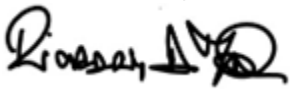
The Scoping Report details a Data Centre. It has been the experience of FRNSW that Data Centres present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022[1].

FRNSW will likely recommend a Fire Safety Study (FSS) be developed in accordance with the Hazardous Industry Planning Advisory Paper No 2[2] as a condition of consent. The FSS should be used to inform the design and as such it is FRNSW Position[3] that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).

The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets[4].

Project proponents undertaking the FSS are to engage directly with FRNSW by submitting all correspondence electronically to FireSafety@fire.nsw.gov.au and reference FRNSW file number FRN25/3750. Further information regarding FRNSW Meetings[5] and FRNSW Written Reports[6] can be found at the FRNSW Building Fire Safety Industry Portal[7].

Yours sincerely,



Station Officer Richard Jay
A/Team Leader
Fire Safety Liaison Unit

Cc: jeffrey.peng@planning.nsw.gov.au

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[1] https://ncc.abcb.gov.au/editions/ncc-2022
[2] https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf
[3] https://www.fire.nsw.gov.au/page.php?id=9447&position=51
[4] https://www.fire.nsw.gov.au/page.php?id=9166
[5] https://www.fire.nsw.gov.au/page.php?id=9193
[6] https://www.fire.nsw.gov.au/page.php?id=9156
[7] https://www.fire.nsw.gov.au/page.php?id=9140

Department of Climate Change, Energy, the Environment and Water

Our ref: HMS ID 12857

Jeffrey Peng
Department of Planning, Housing and Infrastructure
jeffrey.peng@planning.nsw.gov.au

Letter uploaded to the Major Projects Planning Portal

Input to SEARs – State Significant Development

Proposal: Project Atlas Data Centre Eastern Creek

Major Project reference: SSD-101067971

Received: 3 December 2025

Dear Mr Peng,

Thank you for seeking input to the Secretary's Environmental Assessment Requirements for the above State Significant Development proposal.

In preparing this advice Heritage NSW has reviewed the provided scoping report. Heritage NSW recommends that the following Secretary's Environmental Assessment Requirements be included with respect to Aboriginal cultural heritage in relation to the proposed Project Atlas Data Centre Eastern Creek (SSD-101067971)

- The Environmental Impact Statement should be informed by an Aboriginal Cultural Heritage Assessment Report, prepared in accordance with relevant policy and guidelines to identify, describe and assess any impacts to Aboriginal cultural heritage sites or values associated with the project. The Aboriginal Cultural Heritage Assessment Report must be prepared in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* https://www.environment.nsw.gov.au/publications/guide-investigating-assessing-and-reporting-aboriginal-cultural-heritage-new-south-wales and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* https://www.environment.nsw.gov.au/publications/code-practice-archaeological-investigation-aboriginal-objects-nsw , including results of archaeological survey and test excavations (where required) undertaken in accordance with the relevant standards and requirements;
- Include evidence of adequate and continuous consultation with Aboriginal parties in relation to determining and assessing impacts, identifying and selecting options for avoidance of Aboriginal cultural heritage and identifying appropriate mitigation measures (including the final proposed

measures) in substantial compliance with the consultation process outlined in the *Aboriginal cultural heritage consultation requirements for proponents* https://www.environment.nsw.gov.au/publications/aboriginal-cultural-heritage-consultation-requirements-proponents

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Alison Lamond at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
9 December 2025

Department of Climate Change, Energy, the Environment and Water

Our ref: HMS ID 12858

Jeffrey Peng
Department of Planning, Housing and Infrastructure
jeffrey.peng@planning.nsw.gov.au

Letter uploaded to the Major Projects Planning Portal

Input to SEARs – State Significant Development

Proposal: Project Atlas Data Centre Eastern Creek

Major Project reference: SSD-101067971

Received: 3 December 2025

Dear Mr Peng,

Thank you for inviting SEARS input from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. Therefore, no heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.

If you have any questions about this correspondence, please contact Alison Lamond at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely

Alison Lamond

Alison Lamond
Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
9 December 2025

Transport for NSW

9 December 2025

TfNSW Reference: SYD25-01490/01
DPHI Reference: SSD-101067971

Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2150

Attention: Jeffrey Peng

REQUEST FOR SECRETARYS ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
ADVICE ON SEARS FOR ATLAS DATA CENTRE
10 ROBERTS ROAD, EASTERN CREEK

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) an opportunity to provide input to the Secretary's Environmental Assessment Requirements (**SEARs**) for the proposed State Significant Development Application (**SSDA**) at 10 Roberts Road, Eastern Creek.

TfNSW has reviewed the Scoping Report (prepared by Mecone 25 November, 2025) and provides suggested assessment requirements in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

Should you have any questions regarding the above matter, please contact Brett Morrison, Land Use Planner on phone 0448 890 598 or via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Manager Land Use Assessment Central and Western
Transport Planning Branch
Planning, Integration and Passenger Division

TAB A – TfNSW suggested SEARs inclusions

1. *Transport Impact Assessment (**TIA**)*: A TIA shall be prepared in accordance with the *Guide to Transport Impact Assessment* (**GTIA**). GTIA replaces the Guide to Traffic Generating Developments and can be found at this link. The TIA will enable TfNSW to understand the impacts the development may have on the transport network, as well as the impacts to the state classified road network resulting from increased vehicular, bus and pedestrian/active transport movements. The TIA must include, but not be limited to, the following:

    - Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and
    - Measures to integrate the development with the existing/future public transport network.
    - A review of the crash data along the identified transport route/s and key nearby intersections for the most recent 5-year reporting period and an assessment of the safety implications of the proposed development and required mitigation measures.
    - Details of the site access and pedestrian network and parking provision associated with the proposed development, in accordance with the relevant Australian Standards, Austroads Guide and Council's Development Control Plan (**DCP**).
    - Plans demonstrating how all vehicles likely to be generated during construction can be accommodated on the site to avoid impacts to the transport network. A preliminary Construction Transport Management Plan (**CTMP**) should be prepared as part of the TIA to mitigate any such impacts.
    - TfNSW encourages the proposal to minimise the reliance on car usage through providing minimal parking spaces and the implementation of Travel Demand Management (**TDM**) measures.
    - Details of TDM measures to be utilised to minimise the development impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and/or specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site.

Blacktown City Council

Connect • Create • Celebrate

Your reference: SSD-101067971
File number: MC-25-00009

19 December 2025

NSW Department of Planning, Housing and Infrastructure
GPO Box 39
Sydney NSW 2001

By email: jeffrey.peng@planning.nsw.gov.au

Dear Mr Peng

SSD -101067971 Project Atlas Data Centre Eastern Creek

Thank you for your correspondence dated 3 December 2025 requesting our input to the project specific Secretary's environmental assessment requirements (SEARS) for the proposed Project Atlas Data Centre Eastern Creek at 10 Roberts Road, Eastern Creek which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act* 1979.

We have reviewed the applicant's request for SEARs and our requirements are listed in the attachment to this letter. We request that these requirements be included in the Department of Planning, Housing and Infrastructure's (DPHI) SEARs list to be addressed in the Environmental Impact Statement (EIS) for the proposal.

If you have any queries on the matters set out in the attachment, please contact Bertha Gunawan, our Senior Town Planner, on 9839 6134.

Yours faithfully

Judith Portelli
Manager Development Assessment

Attachments:

1. SSD - 101067971 Project Atlas Data Centre Eastern Creek

Blacktown City Council submission
SSD 101067971 Project Atlas Data Centre Eastern Creek

1. Planning requirements

a. The following environmental planning instruments and development control plans are applicable to the proposal:

- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Industry and Employment) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Planning Systems) 2021
- Blacktown Development Control Plan - Eastern Creek Precinct Plan
- Central City District Plan 2018
- Blacktown Local Strategic Planning Statement 2020

b. The EIS is to document compliance with the controls supported by detailed justification if there is intended to be any proposed departure from the prevailing controls.

c. The application must be referred to Transgrid and Sydney Water Corporation as the proposed works' site adjoins SP2 land intended for Electricity Transmission or Distribution Network and Water Supply Systems.

d. The application must be referred to Endeavour Energy as the proposal includes the provision for substations.

e. Surrounding properties must be notified by the Department of Planning, Housing and Infrastructure upon receipt of the development application.

f. Provide a detailed car parking assessment in the event of a future adaptive reuse if the building should become redundant for data centre purposes in the future.

2. Engineering requirements

a. The applicant shall provide engineering plans with the DA for assessment as per the Blacktown City Council Engineering Guide for Development 2005.

b. A detailed stormwater management plan, including the detailed design of WSUD system, WSUD catchment plan, internal drainage and rainwater tanks in accordance with Council's Engineering Guide for Development 2005, is to be provided.

c. An electronic copy of MUSIC modeling to determine the reduction target of the proposed water quality treatment device and the volume of the rainwater tank, is to be provided.

d. A detailed civil plan, including the dimension of the proposed pipes and pits, and longitudinal sections of the proposed pipeline with the hydraulic grade line is to be provided.

e. An electronic copy of DRAINS to design and determine the proposed pit and pipes must be provided, if applicable.

3. Traffic requirements

a. A comprehensive Traffic and Parking Assessment report, prepared by a suitably qualified traffic engineer (consultant), shall be submitted with the DA. The report is to be prepared in line with the NSW Government Guide to Transport Impact Assessment 2024 Version 1.1.

The report is to include the assessment of number and allocation of parking spaces, swept paths, dimensions, aisle widths, ramp grades and impact on the surrounding road network as applicable. Traffic generation and safety assessment and also to minimise amenity impact for neighbouring properties.

Demonstrate that there is sufficient on-site parking and that there will be no traffic-related issues resulting from the proposed development. The proposed use must not create on-street parking problems and must be able to cater for its own car parking demands on the site. On-street parking will not be considered as part of a parking solution for the proposed development.

b. Parking layout and accessible parking spaces must comply with the current Australian Standard (AS). All vehicles must enter and exit the site in a forward direction.

4. Environmental Health requirements

Contamination -

a. The Scoping Report states that a "Preliminary Site Investigation is currently being undertaken for the site understand the underlying contamination and potential remediation strategies on the site". The applicant is to provide a copy of this Preliminary Site Investigation for us to review once completed.

Acoustics -

b. The Scoping Report states that due diligence has been conducted in terms of the potential acoustic impact of the site's operations. Modelling prepared by Renzo Tonin & Associates determined that "noise emissions from normal site operations and maintenance testing scenarios are able to comply if mitigation strategies are applied."

The applicant is to provide the full acoustic assessment for the site and its operations, including the mitigation strategies which have been referenced.

Air -

c. The Scoping Report states that an Air Quality report is currently being prepared for the proposal. The applicant is to provide a copy of the Air Quality report for us to review once completed.

Fuel Storage -

d. Details regarding the fuel storage and bunding design are to be submitted with the DA for assessment.

5. City Architect's requirements

Site and Landscaping -

a. There are several mature trees on the site, and they should be retained where possible with detailed justification provided if they are proposed to be removed. An arborist report is required to be provided with the DA.

b. Given the bulk and scale of the proposed development, it is recommended that increased setbacks beyond those proposed in the concept plans are provided. The setbacks must also contain landscaping, including large canopy trees.

c. The applicant is required to provide landscape plans and a biodiversity report with the DA that demonstrate how the proposal is well considered and environmentally aware.

Built form -

a. A lack of information has been provided on materials and finishes. The applicant is required to provide the materials and finishes proposed with the DA, accompanied by elevation drawings and renders that visually represent this.

b. The design should carefully consider the surrounding environment providing appropriate acoustic measures and façade articulation. A visual impact statement to be provided with justification for bulk and scale.

c. The overall design logic and composition must consider visual identity, context and function in a meaningful way.

6. Biodiversity and Greenspace requirements

a. An Arboricultural Impact Assessment Report (AIA) is to be submitted and prepared by an arborist with a minimum AQF5 qualification. The report must overlay the existing trees with the proposal, include impact assessment of all works on all trees and a tree protection plan for trees to be retained in line with AS4970:2025.

b. A Biodiversity Development Assessment Report (BDAR) is to be submitted in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020. It is to be prepared by an accredited assessor. The BDAR is to cover all demolition, earthworks, access and construction impacts inclusive of the offsite enabling infrastructure proposal.

c. A realistic and detailed site-wide landscape plan is to be submitted and prepared by a qualified professional that details the location, number and species of trees, shrubs and ground covers to be retained, replaced or established across the site in setbacks, communal areas, deep soil, street and car parking areas. It must include locally native species and suitable trees to reduce the impact of hard paving and mitigate urban heat with heights and projected canopy coverage to be shown on the plans.