



Mr Paul Christensen
General Manager – Data Centres
Macquarie Data Centres Pty Ltd
Level 15, 2 Market Street
SYDNEY NSW 2000

Dear Mr Christensen

**Talavera Road Data Centre Campus Expansion (SSD-24299707)
Additional Matters for Submissions Report**

I refer to the Department's previous correspondence dated 17 December 2021 which requests the provision of a Submissions Report in response to issues raised in submissions by agencies and the public.

In addition to responding to the submissions already received you are required to submit additional information that addresses the issues identified in **Attachment 1**.

If you have any questions regarding this matter, please contact Patrick Copas on (02) 9274 6273 or via email at patrick.copas@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Ritchie'.

22 December 2021

Chris Ritchie

Director

Industry Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Based upon the Department's review of the information of the EIS, the Department considers further information is required to clarify matters and addresses inconsistencies within the documentation. In this regard the following information is required to be provided:

Air quality

1. While the AQIA has identified a number of residential or childcare receivers in the vicinity of the site, this approach is not consistent with the provisions of the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*. Sensitive receptors are defined as 'A location where people are likely to work or reside...' and the AQIA should subsequently be amended to reflect this. The AQIA should also clarify the type of sensitive receptor located at 15 Talavera Road.
2. The criteria for NO₂ and SO₂ were recently amended in the *National Environment Protection (Ambient Air Quality) Measure* (NEPM) and has been endorsed at federal and state levels across Australia. It is understood arrangements are being made for its incorporation into the 'Approved Methods'. Please evaluate the development using the NEPM criteria.
3. The AQIA demonstrates that exceedances of the applicable criteria will occur at the nearest sensitive receptor during the 'worst case' scenario. The AQIA/proposed management and mitigation measures should be updated to include a pro-active program for notifying neighbouring properties when all generators are operating.
4. Please update the emissions data provided for all existing and proposed generators to ensure consistency (i.e. a fuel burn rate should be provided for all generators, the same units of measurement should be used, etc). This information should be readily available from the manufacturer.
5. Are the emission figures provided in Table 4 reflective of a single generator unit or all units combined, and what power setting has been adopted?
6. Table 5 – 34 generators tested four times per year for 1 hour = 136 hours not 132 hours.
7. The text description provided under Table 5 is not consistent with the testing regime described in the table. Table 5 states 1 – 5 generators per test and a maximum of 8 tests per day, which would permit all generators to be tested in a single day. However, the text under Table 5 states that no more than 5 generators would be tested per day.
8. Table 6 – footnote 'd' does not exist in the table.
9. Please confirm the figures used for NO₂ and SO₂ in Table 9 (i.e. should they be listed as ppb?). If the information provided is correct, please clarify why a different unit of measurement is appropriate in this context.
10. Table 27 – PM₁₀ and PM_{2.5} should be listed separately.
11. Tables 27, 29, 30 and 31 – Cumulative amounts should be provided such as done in Table 28.
12. Table 32 – In columns 2 and 7, PM₁₀ and PM_{2.5} should be listed separately.
13. Tables 34, 35 and 36 – Cumulative amounts should be provided such as done in Table 28.

Noise and vibration

14. The Department understands the SSD application is seeking approval for construction works to take place outside of the *Interim Construction Noise Guideline's* (ICNG's) standard construction hours. The ICNG notes that works may be undertaken outside the recommended hours where an applicant demonstrates and justifies a clear need to operate outside of these hours for reasons other than convenience. The Submissions Report must address this requirement of the

ICNG, noting that in general, only works undertaken on public infrastructure need to be undertaken outside the recommended standard hours.

15. The Department notes that the noise measurement data provided for L2 is several years old (obtained in 2016), and may not be representative of current background levels within NCA 2. Further justification should be provided to confirm the appropriateness of this data, particularly given the level of change which has occurred in that area over the past five years and the fact that greater Sydney is, at the time of writing, not in a lockdown.
16. Given the operational status of the site, please justify why on-site measurements have not been undertaken to verify existing plant noise emissions.
17. For Table 27, please confirm which measurements have been verified by on-site monitoring and which measurements have been based on the technical data provided by the manufacturer. In addition, please confirm whether the noise level provided is per individual unit or for all units within the same category (i.e. 1 x DRUPS or 5 x DRUPS = 105 dB(A)).
18. The NIA notes that periodic maintenance testing "...would only occur during the daytime and one generator would be operating at any one time". This statement is not consistent with the assumptions used in the AQIA and should subsequently be clarified.
19. Please justify why an 'emergency' scenario has not been modelled in the NIA, particularly given this scenario was considered as part of the AQIA.

Traffic and access

20. The Department notes the Preliminary Construction Traffic Management Plan (CTMP) included in the EIS does not include a breakdown of vehicle movements by heavy vehicles/construction staff vehicles. The Submissions Report must clarify the total number of heavy vehicles/construction staff vehicles per day and during the morning/afternoon peak periods, and include a cumulative assessment of construction traffic impacts on the surrounding road network (i.e. consideration of the nearby Stockland site and impacts associated with SSD-10467).
21. The Preliminary CTMP does not clearly describe parking arrangements for staff vehicles. Given the significant number of construction staff, the Submissions Report must provide a clear, conservative assessment of the number of staff likely to drive to the site and how these movements would be accommodated/minimised.
22. The Submissions Report must clearly describe how current on-site operations and construction activities would be managed.
23. The Traffic Impact Assessment (TIA) included in the EIS models vehicle movements generally, but does not include a breakdown of vehicle movements by heavy vehicles/operational staff vehicles. The Submissions Report must clarify the total number of heavy vehicles/construction staff vehicles per day and how often heavy vehicles are likely to visit the site (i.e. 2-3 times a week for deliveries/garbage collection, etc).

Hazards and risk

24. The EIS makes several references to 'no dangerous goods are to be used or stored at the facility' (e.g. in Section 6.1.8 and Appendix 18, Section 3.1). The Department notes that lithium ion batteries would form part of the proposal and are classified as Dangerous Goods Class 9 – Miscellaneous Dangerous Substances (DG Class 9) under the *Australian Dangerous Goods Code*. The Department acknowledges DG Class 9 are excluded from the preliminary risk screening method outlined in *Applying SEPP 33* and note the method has been applied correctly, demonstrating that the SSD is not potentially hazardous under SEPP 33 and a PHA is not required to be submitted.
25. However, the Department notes that the EIS (especially Section 6.1.8 'Hazards and risk', Appendix 18 'SEPP 33 Report' and Appendix 19 'Fire Safety Strategy Report') does not provide

any information on whether the proposal can comply with AS 4681, AS 62619, FM Global DS 532 and AS 1940 which are the standards specified in the SEARs. Accordingly, the Department requests the Applicant provide sufficient information to demonstrate that allowances have been made in the design of the expansion to incorporate all relevant requirements under these standards. In particular, the final fire safety strategy should be informed by the requirements of FM Global DS 5-32 and FRNSW, rather than just the BCA (noting this was the primary focus of the Fire Safety Strategy Report provided in Appendix 19 of the EIS).

Ecologically sustainable development

26. Based on the EIS, the Department understands the proposal will consume a substantial volume of water and electricity each year. The Submissions Report should demonstrate how the development has been designed to minimise water and electricity use, with regard to the principles of ESD. While external factors (such as the electricity grid's gradual transition to sustainable technologies) will help reduce the impact of the development over time, the Submissions Report should confirm that the Applicant has explored all reasonable and feasible measures to reduce electricity/water use for the subject proposal.
27. Based on the Sustainability and Greenhouse Gas Emission Statement, the Department understands the completed data centre will achieve a NABERS Energy Stars rating of between 5 and 5.5 stars. However, the Department also notes it may be several years before the expansion is fully occupied and this could negatively impact the development's energy efficiency during this period. The Submissions Report should detail how the NABERS Energy Stars rating would be maintained during partial operations, and consideration should be given to the Applicant signing up to a NABERS commitment agreement for the proposed expansion.

Tree removal

28. The Department understands the proposal would involve the removal of 55 on-site trees and the retention of 39 trees. It is unclear if this takes into consideration any additional trees that may need to be removed to facilitate the proposed stormwater easement along the western boundary of the site. This discrepancy should be clarified in the Submissions Report.
29. The Department understands the proposal would involve planting of 47 new trees across the site. In accordance with Council's DCP and Tree Management Technical Manual, the Submissions Report should include updated landscape plans for the proposal demonstrating that those trees proposed for removal from the site would be replaced at a ratio of 1:1 or greater. Alternatively, clear justification should be provided as to why a ratio of 1:1 is not reasonable/feasible.

Clarifications

30. The Department notes the GFA figures referred to in the EIS differ slightly from those figures referenced in the architectural plans. Please clarify accordingly.
31. The Department notes the number of proposed construction jobs (1,200 jobs) is significantly higher than comparable projects in the surrounding area. The Submissions Report should clarify the assumptions which have informed this number.