

Ref: **SSD-41589232**
WTJ25-427



WILLOWTREE PLANNING

MODIFICATION REPORT: 51 HUNTINGWOOD DRIVE DATA CENTRE – S4.55(1A)

51 HUNTINGWOOD DRIVE, HUNTINGWOOD
LOT 1 DP 857249

Prepared by Willowtree Planning Pty Ltd
on behalf of AW Edwards Pty Ltd

May 2026

SYDNEY

—
Level 4
165 Walker Street
North Sydney NSW 2060

BRISBANE

—
Level 9, 243
Edward Street
Brisbane QLD 4000

02 9929 6974
equiries@willowtp.com.au
willowtreeplanning.com.au



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PLANNING

In the spirit of reconciliation and recognition, Willowtree Planning acknowledges the Traditional Owners of this Country throughout Australia and their continuing and ongoing connections to land, waters and community. We show our respect to Elders – past and present. We acknowledge that we stand on this Country which was and always will be recognised as Aboriginal Land. We acknowledge the Traditional Owners of the Lands in this Local Government Area, belonging to the local Aboriginal People, where this proposal is located upon.

MODIFICATION REPORT

51 Huntingwood Drive Data Centre
51 Huntingwood Drive, Huntingwood (Lot 1 DP 857249)

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GLOSSARY OF KEY TERMS

TERM	MEANING
AHD	Australian Height Datum
BAM	Biodiversity Assessment Methodology
BCA	Building Code of Australia
BC Act	<i>Biodiversity Conservation Act 2016</i>
BCBHS	Building Code and Bushfire Hazard Solutions
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
BLEP2015	<i>Blacktown Local Environmental Plan 2015</i>
BOS	Biodiversity Offset Scheme
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CIV	Capital investment value
Blacktown City Council	Blacktown City Council
CTMP	Construction Traffic Management Plan
DA	Development Application
DCP	Development Control Plan
DP	Deposited Plan
DPE	Department of Planning and Environment
EES	Environment, Energy and Science Group
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPA	Environment Protection Authority



EPBC Act	<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environmental Protection Licence
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
FSR	Floor Space Ratio
GFA	Gross Floor Area
GHG	Greenhouse Gas
GSC	Greater Sydney Commission
LGA	Local Government Area
MNES	Matter of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NCC	National Construction Code
NOR	Notice of Requirements
NSW RMS	NSW Roads and Maritime Services
OEH	NSW Office of Environment and Heritage
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
RL	Reduced level
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIDRA	Signalised & unsignalised Intersection Design and Research Aid
Sqm or m²	Square metres
Subject site/site/study area	51 Huntingwood Drive, Huntingwood (Lot 1 DP 857249)
TfNSW	Transport for NSW
VIA	Visual Impact Assessment
VPA	Voluntary Planning Agreement
Willowtree Planning	Willowtree Planning Pty Ltd
WM Act	<i>Water Management Act 2000</i>
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design



EXECUTIVE SUMMARY

This Modification Application seeks approval to amend development consent SSD-41589232 for a 400 Megawatt (MW) data centre at 51 Huntingwood Drive, Huntingwood, pursuant to Section 4.55(1A) of the Environmental Planning and Assessment Act 1979.

The original consent, granted on 15 September 2023, approved construction and operation of a data centre with supporting infrastructure. This modification optimises the approved development to reflect contemporary data centre technology and delivers improved operational efficiency while maintaining the approved 400 MW capacity.

Scope of Modification

The proposed changes consolidate the data centre design through technological advancement and infrastructure rationalisation as follows:

Built Form and Capacity

- Data shell consolidation from 10 to 5 shells.
- Capacity redistributed to shells B, C, D, and E, delivering an IT load of approximately 72 MW using higher-density rack configurations.
- Gross Floor Area reduced from 122,546 m² to 64,346 m² (58,200 m² reduction).
- Maximum building height maintained at 49.75 m, consistent with the approved SSD.
- Emergency generators maintained at 316 units, consistent with the approved SSD.
- Bulk diesel storage maintained at 4,048 kL, consistent with the approved SSD.
- Car parking maintained at 149 spaces, including 4 accessible spaces and 10 bicycle spaces.

Infrastructure and Plant

- Rearrangement and redistribution of building shells, including mechanical plant (Hybrid Dry Coolers) relocated to ground-level positions along the eastern, southern and western boundaries. HDC numbers reduced from 172 to 144 to suit the consolidated five-shell layout.
- Reconfiguration of supporting infrastructure including gantry systems and chiller farms to suit the consolidated five-shell layout and increased per-shell loads.
- Generator discharge height refined to 41.0–43.0 m AGL (previously 34.5 m and 41.0 m AGL), maintaining the 41 m AGL minimum height specified in the Minister's Conditions of Approval.
- Water tanks in the Southern Tank Yard reduced from 8 to 5, with 3 tanks relocated to the centre of the site, reducing visual bulk along the M4 boundary.
- Ground-level fuel tank farms retained. All fuel tanks fire-rated, bunded, and AS1940 compliant.

Other Changes

- Minimal increase in tree removal (six additional trees; 2,137 total vs 2,131 approved). The 6 additional trees are required for the Sydney Water incoming valve arrangement along Huntingwood Drive.
- Updated landscaping strategy with landscaping area of 11,270 m² (reduced from 12,021 m² approved). Supplementary landscaping along the southern boundary retained and enhanced for screening. Total trees post-planting maintained at 607, equivalent to the approved SSD. Refer to **Appendix B2**.
- Net earthworks: cut 104,654 m³ (+15,554 m³ increase from approved SSD); net fill 81,600 m³ (unchanged). Increase reflects inclusion of in ground services and detailed excavation to the figure due to further progressed design. Refer to **Appendix B7**.

Justification for Modification



The data centre industry has progressively adopted higher-density rack configurations, enabling operators to deliver equivalent IT processing capacity within a reduced physical footprint. This consolidation represents operational efficiency that reduces overall built form across the Site while delivering an optimised facility configuration.

The previous modification was withdrawn as evolving client demand and rapid advances in data centre technology necessitated a revised design approach. This modification reflects updated infrastructure requirements and optimised facility configurations that were not contemplated at the time MOD 1 was prepared. This modification has also been purposefully designed to address the matters raised by the NSW EPA, CPHR Group and Blacktown City Council during the MOD 1 assessment process, with key parameters returned to the approved SSD baseline (including building height, generators, car parking and noise criteria).

Relocation of mechanical plant to ground level delivers material operational improvements as follows:

- Enhanced worker safety and ergonomic access for routine maintenance and servicing.
- Improved coordination of maintenance activities and operational oversight.
- Clear spatial separation between maintenance activities and data hall operations.
- Enhanced operational efficiency and security protocols.

Environmental Assessment

The modification has been assessed against the original Secretary's Environmental Assessment Requirements. All environmental impacts have been evaluated, demonstrating that the modification results in minimal environmental impact with equivalent or improved outcomes across key assessment areas:

- Air quality scope remains consistent with the approved SSD. Updated modelling by Northstar Air Quality using the refined Janssen NO_x-to-NO₂ conversion methodology (accepted by the NSW EPA during MOD 1) demonstrates full compliance with contemporary impact assessment criteria across the modelling domain. The generator testing regime is comprehensively documented, with three (3) generators tested simultaneously (one per generator bank) at 100% load during the daytime period (7am–6pm), consistent with MCoA Condition B1 and the approved SSD testing arrangement. Generators will not operate for more than 200 hours per year, consistent with the POEO (Clean Air) Regulation 2022 exemption. An updated specialist report is provided (**Appendix B5**).
- Tree changes affect planted native vegetation only, not remnant Cumberland Plain Woodland. No additional biodiversity offset requirements. All originally approved offset obligations remain satisfied. An updated Biodiversity Verification Statement (Travers bushfire & ecology) confirms no increased impact on biodiversity values and that, in accordance with Section 7.17 of the Biodiversity Conservation Act 2016, a new or updated BDAR is not required (**Appendix B10**).
- The Visual Impact Addendum (**Appendix B3**) reassesses the viewpoints from the original assessment and concludes that the proposed modification does not result in any material increase in adverse visual impacts. Deletion of data hall shells reduces perceived built form bulk and improves landscape screening effectiveness. The building height remains consistent with the approved SSD level of 49.75 m, consistent with the approved building envelope, with no adverse visual or amenity impacts.
- Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA). Updated acoustic modelling by Pulse White Noise Acoustics demonstrates full compliance with the Blacktown DCP 2015 and NSW NPfl noise criteria at all surrounding receivers across both daytime and night-time operational scenarios, subject to installation of an acoustic louvre to the eastern side of the Shell A rooftop. The approved noise conditions are otherwise retained - no new sources or operational changes warrant departure from the approved consent. An updated acoustic memorandum is provided (**Appendix B4**).



- The car park configuration maintains the approved 149 spaces and the approved traffic movement and generation outcomes. An updated Traffic Impact Assessment supports these outcomes (**Appendix B6**).
- Modifications to the approved landscaping strategy (**Appendix B2**) ensure suitable tree planting and species selection to enhance the natural setting. The proposal involves a minimal increase in tree removal (six additional trees to the approved amount of 2,131). Supplementary landscaping along the southern boundary has been retained and enhanced for screening of water tanks and infrastructure from the M4 corridor. A Biodiversity Verification Statement (**Appendix B10**) confirms no additional impacts on biodiversity values.
- The infrastructure approved to service the original data centre development can service the proposal as modified. An updated Infrastructure Requirements Report identifies any new plant and equipment required due to the rationalisation of the building design. Refer to **Appendix B9**.
- An updated BCA Compliance Report confirms that the modified development can achieve compliance with the BCA through a combination of deemed-to-satisfy and performance solutions (**Appendix B11**).
- An updated Hazards and Risk Assessment Report (SLR Consulting) confirm residual risks associated with diesel storage and lithium-ion batteries are assessed as Negligible to ALARP, addressing the matters raised by the NSW EPA during the MOD 1 process (**Appendix B8**).

Other Environmental Matters:

- Stormwater and wastewater outcomes remain unchanged per the parent approval. An updated Integrated Water Cycle Management Plan is provided.
- Waste management has been reviewed and updated.
- No heritage constraints apply to the site.
- No contamination or remediation concerns arise.
- No flood risk applies to the site.
- No increase to operational capacity. GHG assessment methodology is clearly documented in the modification application.

Statutory Assessment

The proposed modification satisfies the legislative requirements for approval:

- The modification results in overall reduction and rationalisation of the approved data centre with improved or equivalent environmental outcomes across all key impact categories including air quality, noise, traffic generation, parking provision, tree retention, operational emissions, and visual impact.
- The modification maintains the fundamental character and purpose of the approved development. The development remains a data centre located at the same location on the same land parcel (Lot 1 DP 857249), with unchanged 24-hour operational framework and consistent infrastructure and services arrangements. The reduction in data shells from ten (10) to five (5) represents an operational efficiency response to technological advancement rather than a fundamental change to development type or character.
- The Site is not subject to maximum height or Floor Space Ratio development standards. The proposed modification maintains the approved building height of 49.75 m and achieves a significantly reduced floor area.

Recommendation

Based on specialist assessments demonstrating minimal environmental impact and equivalent or improved environmental outcomes across all key assessment areas, the proposed modification is supportable subject to relevant and reasonable conditions.



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The modification represents orderly and appropriate development that delivers improved operational efficiency and environmental performance whilst maintaining the approved development envelope. The proposal reflects contemporary data centre industry practice and best practice operational standards.



PART 1 INTRODUCTION

1.1 OVERVIEW

This Modification Report has been prepared by Willowtree Planning, on behalf of AW Edwards Pty Ltd (the Applicant). The Modification Report is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI), in support of the proposed modification (MOD 1) to the approved 51 Huntingwood Drive Data Centre, involving consolidation and optimisation of the approved data centre design. A previous modification application (MOD 1) was withdrawn due to evolving client demand and rapid advances in data centre technology necessitating a revised design approach.

The 51 Huntingwood Drive Data Centre was approved as State Significant Development (SSD), granted under delegation by the Minister of Planning on 15 September 2023. The SSD (SSD-41589232) approved construction and operation of a data centre with an operational capacity of 400 Megawatts (MW) including back-up power and cooling systems, diesel and lithium-ion battery storage, associated infrastructure, car parking and landscaping as well as demolition of existing structures and bulk earthworks.

This modification application seeks to modify the development consent to include the deletion of data hall shells to consolidate from 10 to 5 shells, redistribution of MW capacity across shells A, B, C, D, and E (delivering an IT load of approximately 72 MW, reconfiguration of supporting infrastructure including gantry systems and chiller farms, relocation of mechanical plant (Hybrid Dry Coolers) to ground level along the eastern, southern and western boundaries and optimisation of infrastructure through contemporary data centre technology advancements.

The modifications sought have been assessed against the original Secretary's Environmental Assessment Requirements (SEARs) throughout this Modification Report, confirming that the proposal remains substantially the same development, as approved.

The structure of this Modification Report has been prepared in accordance with the NSW DPHI's *State Significant Development Guidelines – Preparing a Modification Report* as follows:

- **PART 1 INTRODUCTION**
- **PART 2 STRATEGIC CONTEXT**
- **PART 3 DESCRIPTION OF THE MODIFICATIONS**
- **PART 4 STATUTORY CONTEXT**
- **PART 5 ENGAGEMENT**
- **PART 6 ASSESSMENT OF IMPACTS**
- **PART 7 PROJECT JUSTIFICATION**

1.2 DEVELOPMENT APPLICATION HISTORY

Consent was granted to SSD-41589232 on 15 September 2023 for construction and operation of a 400 MW data centre with associated infrastructure, car parking, and landscaping, including demolition of existing structures and bulk earthworks at 51 Huntingwood Drive, Huntingwood (Lot 1 DP 857249).

Review of the approval granted under SSD-41589232 indicates there is nothing which prevents the modifications sought under this application.

A previous modification application (SSD-41589232-Mod-1) has been formally withdrawn. This application supersedes the withdrawn modification.

The approved development is outlined in the **TABLE 1** and **Figure 1**.



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51 Huntingwood Drive Data Centre
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TABLE 1: APPROVED DEVELOPMENT ATTRIBUTES

Aspect	Description
Development summary	Construction and 24-hour operation of a data centre with an operational capacity of 400 MW including back-up power and cooling systems, diesel and lithium-ion battery storage, associated infrastructure, car parking and landscaping, as well as demolition of existing structures and bulk earthworks.
Site area	90,172.8 m ² (Lot 1 DP 857249)
Gross floor area (GFA)	122,546 m ²
Floor space ratio (FSR)	Not subject to maximum FSR development standard
Building height	49.75 m (maximum, seven storeys)
Key features	Ten (10) data shells with roof-mounted mechanical plant; office space; two electrical substations; 172 hybrid dry coolers; 86 water cooled chillers; 729,552 kg lithium-ion batteries; 316 diesel back-up generators; 318 electrical transformers; 30 diesel fuel storage tanks (4,048 kL total)
Vegetation clearing	2,131 trees to be removed; 129 trees to be retained; 12,021 m ² landscaping
Earthworks, civil works and services	Net cut of 89,100 m ³ ; net fill of 81,600 m ³ ; 132 kV transmission line connection; dual 33 kV feeders; stormwater management with on-site detention and water quality treatment
Parking and manoeuvrability	149 car parking spaces (including 3 accessible spaces and 10 bicycle spaces); internal roads accommodate 19 m trucks safely
Traffic	138 light vehicles and 4 heavy vehicles during AM/PM peak hours; intersections assessed for acceptable performance
Infrastructure	132 kV transmission line; dual 33 kV feeders; potable water supply; future recycled water delivery; stormwater management systems; utilities coordination with Endeavour Energy, Sydney Water, Telstra
Landscaping	12,021 m ² of landscaping consisting of native and endemic plant species, shrubs, trees and grasses; perimeter landscaping with 10 m setback to M4 Motorway
Signage	Not specified in original approval
Hours of operation	24 hours per day, seven days per week
Employment	1,333 full-time equivalent construction jobs; 276 operational jobs
Capital investment value (CIV)	\$1,074,990,484



During the assessment of the previous modification application (SSD-41589232-MOD-1), DPHI issued three Requests for Further Information dated 9 December 2025, 4 February 2026, and subsequent correspondence, which raised matters from the NSW Environmental Protection Authority (EPA), the Conservation Programs, Heritage and Regulation (CPHR) Group, and Blacktown City Council. MOD 1 was subsequently withdrawn due to evolving client demand and rapid advances in data centre technology necessitating a revised design approach.

This modification has been purposefully designed to address the substance of each issue raised during the previous MOD assessment process. In many instances, the approach adopted resolves the underlying concern by returning to, or maintaining consistency with, the parameters of the original approved SSD. The table below summarises each issue raised and the way this modification responds.

Matter	Agency	Matter Raised During MOD 1	MOD 2 Response
Air Quality	NSW EPA	Predicted NO ₂ concentrations during emergency and generator testing exceeded the 1-hour criterion; remodelling and clarification of testing regime sought.	Maintains approved 316 emergency generators. Updated AQIA (Northstar Air Quality) applies the refined Janssen NO _x -to-NO ₂ conversion methodology accepted by EPA during MOD 1, demonstrating full compliance with the current NSW EPA impact assessment criteria across the

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TABLE 2: MATTERS RAISED PREVIOUSLY

Matter	Agency	Matter Raised During MOD 1	MOD 2 Response
			modelling domain. The generator testing regime is comprehensively documented, comprising three (3) generators tested simultaneously (one per generator bank) at 100% load from 07:00 to 18:00 (Monday to Friday), consistent with MCoA Condition B1. Generators will not operate for more than 200 hours per year, consistent with the POEO (Clean Air) Regulation 2022 Cl. 73 exemption for emergency standby plant.
Acoustics	NSW EPA	Sought reduction of noise limits at residential receivers from 62/60/58 dBA to 44/43/43 dBA (15–18 dBA reduction), plus new LAFmax limit, expanded testing hours, annual attended monitoring, and new compliance methodology.	No new noise sources or operational changes introduced. Approved SSD consent criteria (62/60/58 dBA) retained without amendment. Updated acoustic review (Pulse White Noise Acoustics, Memorandum) demonstrates full compliance with the Blacktown DCP 2015 and NSW NPfl noise criteria at all receivers, subject to installation of an acoustic louvre to the eastern side of the Shell A rooftop. Approved conditions should be retained, consistent with s.4.55(1A).
Lithium-Ion Batteries	NSW EPA	Waste Management Plan to clarify total quantum on site against POEO Act Sch 1 thresholds and address thermal runaway, storage, disposal, maintenance, emergency response, and LEL/temperature alarms.	Comprehensive Hazards and Risk Assessment Report (SLR Consulting) documents 893,000 kg of lithium-ion batteries across 316 Power Train Units within shells A–E. Addresses WHS Reg 2025 (Reg 361), confirms Emergency Plan to be submitted to Fire & Rescue NSW, residual risks assessed as Negligible to ALARP. Applicant accepts condition requiring operational WMP.
Greenhouse Gas	NSW EPA	Detailed GHG information not included; methodology, assumptions, and data to be documented. Modification unlikely to meet EPA Guide for Large Emitters criteria.	No increase in operational capacity proposed. GHG methodology clearly documented with supporting information sufficient to replicate scope 1 and 2 emissions calculations.
Generator Operating Hours	NSW EPA	Detail sought on testing types, frequency, simultaneous generators, duration (incl. warm-up/cool-down), load, time of day, and cumulative	Maintains approved 316 generators. Testing regime comprises three (3) generators simultaneously (one per generator bank) at 100% load from 07:00 to



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TABLE 2: MATTERS RAISED PREVIOUSLY

Matter	Agency	Matter Raised During MOD 1	MOD 2 Response
		hours p.a.; clarification whether 91 hours p.a. included warm-up/cool-down.	18:00 (Monday to Friday), consistent with MCoA Condition B1 and the approved SSD testing arrangement. Generators will not operate for more than 200 hours per year, consistent with the POEO Clean Air Reg Cl. 73 exemption for emergency standby plant.
Biodiversity	CPHR	Application to address s.7.17 of the Biodiversity Conservation Act 2016. CPHR accepted modification unlikely to increase biodiversity impacts or generate ecosystem/species credits.	Updated Biodiversity Verification Statement (Travers bushfire & ecology,) addresses s.7.17 in full. Confirms 6 additional trees for removal are within planted native vegetation (not remnant CPW). Total trees post-planting maintained at 607 (equivalent to approved DA). All ecosystem/species credits retired. Per s.7.17(2)(c)(i), no new/updated BDAR required.
Tree Removal / Arborist Report	Blacktown City Council	Amended Arborist Report addressing 6 additional trees for removal, with tree numbers consistent with original Tree Survey Arborist Report Version 4.	Updated Biodiversity Verification Statement and updated landscape plans (Geoscapes) clearly identify 7 trees newly required for removal and 1 previously-approved tree now retained (net 6 additional). Tree numbers consistent with original survey. Removal required for Sydney Water incoming valve arrangement along Huntingwood Drive; piping underground with no impact on other trees or landscaping.
Cooling Water Systems	Blacktown City Council / NSW Health	Legionnaires' disease risk; detail sought on system type, quantity, location, model specifications, risk assessments, and Operational Management Plans.	No changes proposed to water-cooled units approved under original SSD. Systems unchanged in type, capacity, and operational specifications. Original SSD Operational Management Plans remain applicable. No new NSW Health referral warranted.
Southern Boundary Screening	Blacktown City Council	Visual impact of increased water tanks (5 to 8) and chiller farm along southern boundary fronting M4; additional screening required.	3 water tanks relocated from Southern Tank Yard to centre of site, reducing M4 boundary quantity from 8 to 5. Tank heights remain consistent with approved SSD (no RL exceedance). Supplementary landscaping along southern boundary retained and enhanced per the updated landscape documentation



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TABLE 2: MATTERS RAISED PREVIOUSLY

Matter	Agency	Matter Raised During MOD 1	MOD 2 Response
			(Geoscapes). Material improvement over MOD 1 scheme.
Stormwater and Engineering	Blacktown City Council	Insufficient drainage detail; amended Integrated Water Cycle Management Plan with civil plans and modelling required.	Updated IWCMP (van der Meer Consulting) reflects modified site design (revised earthworks and drainage). MUSIC modelling confirms compliance with all Blacktown City Council WSUD pollutant reduction targets. Consistent with original SSD determination and Condition B39.
Southern Tank Yard Water Tank Height	Blacktown City Council	Water tank heights along southern boundary not to exceed approved SSD RL.	Southern Tank Yard tank heights consistent with approved SSD (no RL exceedance). Tank numbers reduced from 8 to 5, further reducing visual bulk. Amended elevations demonstrating compliance provided in the updated architectural plans (Greenbox Architecture).
Earthworks and Construction Traffic	Blacktown City Council	Assessment of truck movements for balance cut of 15,554 m ³ off site, to be addressed in traffic report and CTMP, with detailed retaining wall sections.	Earthworks volumes maintained as per MOD 1 scheme (net cut 104,654 m ³ ; net fill 81,600 m ³). Updated Traffic Impact Assessment (Impact Traffic Engineering) and Construction Traffic Management Plan accompany application, addressing construction vehicle movements and routes. Detailed retaining wall information in civil engineering package.

In summary, this modification returns key parameters to the approved SSD baseline - including building height (49.75 m), emergency generators (316 units), bulk diesel storage (4,048 kL), car parking (149 spaces), and noise criteria (62/60/58 dBA) - and is supported by updated specialist reports addressing outstanding information requests from the NSW EPA, CPHR, and Blacktown City Council.

Water tanks in the Southern Tank Yard have been reduced from 8 to 5 with enhanced southern boundary landscaping, cooling water systems remain unchanged from the approved SSD, and the GHG methodology and generator testing regime (comprising three (3) generators tested simultaneously (one per generator bank) at 100% load from 07:00 to 18:00 (Monday to Friday), consistent with MCoA Condition B1 and the approved SSD testing arrangement) are now comprehensively documented. A comprehensive Hazards and Risk Assessment Report (SLR Consulting) has been prepared addressing the EPA's lithium-ion battery and diesel storage matters, with residual risks assessed as Negligible to ALARP. In each instance, the issue identified during the MOD 1 assessment has been resolved and, in several cases, materially improved upon. DPHI can be satisfied that this modification application has been informed by, and is responsive to, the matters previously raised.



1.4 SUPPORTING PROJECT DOCUMENTATION

Documents provided in support of the proposal are outlined in **TABLE 3**.

TABLE 3: DOCUMENT SCHEDULE		
Appendix No.	Document Title	Consultant
Appendix A	Updated Project Description	Willowtree Planning
Appendix B	Supporting Documents	-
Appendix B1	Architectural Plans	Greenbox
Appendix B2	Landscape Plans	Geoscapes
Appendix B3	Visual Impact Assessment	Geoscapes
Appendix B4	Noise and Vibration Impact Assessment	PWNA
Appendix B5	Air Quality Impact Assessment	Northstar Air Quality Pty Ltd
Appendix B6	Traffic Impact Assessment	Impact
Appendix B7	MUSIC and Civil	Van Der Meer Pty Ltd
Appendix B8	Hazards and Risk Report	SLR Consulting Australia Pty Ltd
Appendix B9	Infrastructure and Equipment Report	Van Der Meer Pty Ltd
Appendix B10	Biodiversity Verification Statement	Travers Bushfire & Ecology
Appendix B11	BCA and Access Report	McKenzie Group Consulting
Appendix B12	Fire Safety Report	Lote
Appendix B13	Arborist Report	Tree Survey Pty Ltd
Appendix B14	Integrated Water Cycle Management Plan	Van Der Meer Pty Ltd

1.5 CAPITAL INVESTMENT VALUE

The EDC of the Modified Proposal, in accordance with the definition under the Environmental Planning & Assessment Regulation 2021 (EP&A Regulation), is estimated to be \$1,074,990,484. No change to the EDC of the approved scheme is proposed.

1.6 THE PROPONENT

See **TABLE 4** below for contact details.

TABLE 4: PROPONENT CONTACT DETAILS	
Company Details	AW Edwards Pty Ltd
Contact Name	Suzannae Debelak
Position	Senior Design Manager
Email Address	s.debelak@awedwards.com.au



PART 2 STRATEGIC CONTEXT

The strategic context for the proposed modification remains consistent with the original EIS and the previous modification report.

The Site is located within the Huntingwood Industrial Precinct in the Blacktown LGA, strategically positioned within Western Sydney’s established industrial and digital infrastructure corridor.

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this Modification Report is located at 51 Huntingwood Drive, Huntingwood, being formally described as Lot 1 DP 857249 (Site).

The subject site constitutes the following land parcels:

TABLE 5: SITE DETAILS	
51 Huntingwood Drive, Huntingwood	Lot/DP
51 Huntingwood Drive, Huntingwood	Lot 1 DP 857249

The Site comprises a total area of approximately 90,172.80sqm and is subject to the applicable provisions outlined within BLEP2015. Access to the Site is currently obtained via Huntingwood Drive (local road). Access into the Site is made possible via three (3) designated entry and exits along the street frontage of Huntingwood Drive, accompanied by associated hardstand and car parking areas located within the Site.

The Site is situated approximately 31.68 km west of the Sydney CBD, 12.51 km west of Parramatta and 14.94 km north of Liverpool. It is within proximity to transport infrastructure routes (including the bus and rail networks) along Huntingwood Drive and close by (approximately 4.2 km) to Blacktown Station, as well as sharing direct links within the wider regional road network, including the Great Western Highway and both the M4 and M7 Motorways. All of which provide enhanced connectivity to the Subject Site and immediate vicinity, as well as the wider locality. Additionally, the Site is located within proximity to active transport links, such as bicycle routes, providing an additional mode of accessible transport available to the Site.

In its existing state, the Site is currently a construction site with demolition completed.

The Site is surrounded by similar light industrial developments. The Site is adjoined by the M4 Motorway along its southern boundary. Land surrounding the Site comprises the following zoning categories, including:

- E4 General Industrial
- SP2 Infrastructure
- RE2 Private Recreation
- W1 Natural Waterways

The Site is subject to the provisions outlined within BLEP2015, which is the primary Environmental Planning Instrument (EPI) and categorises the Site within the E4 General Industrial zone, as displayed in **Figure 1** below.





PART 3 DESCRIPTION OF THE MODIFICATIONS

3.1 OBJECTIVES OF THE PROPOSAL

The aim of the modified proposal is to consolidate and optimise the approved data centre through contemporary technology, evolving client demand, and industry best practice, resulting in:

- Consolidation of data centre design from 10 to 5 shells through higher-density rack configurations, delivering an IT load of approximately 72 MW across shells A, B, C, D, and E, whilst reducing overall built form (GFA from 122,546 m² to 64,346 m²) and maintaining the approved building height of 49.75 m.
- Optimisation of infrastructure through relocation of mechanical plant (Hybrid Dry Coolers) to ground level positions along the eastern, southern and western boundaries, reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout, and retention of the approved 316 emergency generators, delivering improved operational efficiency, worker safety, and environmental outcomes.
- Enhanced supplementary landscaping along the southern boundary, together with relocation of 3 water tanks from the Southern Tank Yard to the centre of the site to reduce visual bulk along the M4 corridor, reflecting contemporary sustainability and amenity standards.
- Resolution of issues raised during the MOD 1 assessment process by closely aligning key parameters - including building height, generator numbers, bulk diesel storage, and noise criteria - with the approved SSD baseline.
- Support of Greater Sydney's data storage demand through efficient utilisation of appropriately zoned industrial land whilst maintaining the approved construction and operational employment outcomes and reflecting contemporary data centre industry standards.

3.2 PROPOSED CHANGES TO APPROVED DEVELOPMENT

Modification to development consent **SSD-41589232** is sought for consolidation and optimisation of the approved data centre through the following proposed works:

Built Form

- Data hall consolidation from 10 to 5 shells through higher-density rack configurations, delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E, with reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout.
- GFA: 122,546 m² → 64,346 m² (58,200 m² reduction)
- Height: Maintained at 49.75 m, consistent with the approved SSD

Infrastructure

- Rearrangement and redistribution of building shells, with relocation of a portion of the Hybrid Dry Coolers (HDCs) to ground-level positions along the eastern, southern and western boundaries. Total HDC numbers reduced from 172 to 144 to suit the consolidated five-shell layout.
- Reconfiguration of supporting infrastructure including gantry systems and chiller farms to suit the consolidated five-shell layout.
- Water tanks in the Southern Tank Yard reduced from 8 to 5 (per MOD 1), with 3 tanks relocated to the centre of the site to reduce visual bulk along the M4 corridor. Tank heights remain consistent with the approved SSD.



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- Ground-level fuel tank farms retained; fire-rated, bunded, AS1940 compliant. Diesel storage maintained at 4,048 kL, consistent with the approved SSD.
- Emergency generators maintained at 316 units, consistent with the approved SSD.
- Dual electrical substations replacing the approved dual 33 kV feeder arrangement.

Site

- Car parking maintained at 149 spaces, including 4 accessible spaces, and 10 bicycle spaces.
- Trees removed: 2,131 → 2,137 (+6 additional trees); trees retained: 129 → 123 (-6 trees retained). Total trees post-planting maintained at 607, equivalent to the approved DA. The 6 additional trees are required for the Sydney Water incoming valve arrangement along Huntingwood Drive.
- Earthworks: Net cut 89,100 m³ → 104,654 m³ (+15,554 m³ increase); net fill 81,600 m³ (unchanged). Increase reflects inclusion of in-ground services and detailed excavation due to further progressed design.
- Updated landscaping strategy. Landscape area of 11,270 m² (reduced from 12,021 m² approved). Supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor.

Development Scope

- 24-hour data centre operation with associated office, infrastructure, services, parking, landscaping
- Demolition of existing Endeavour Energy building and carparking
- Bulk earthworks as detailed

Construction Phasing

- Phase 1: Shell A
- Phase 2: Shells B, C, D, E, tech building, site infrastructure

TABLE 6 offers a summary of the proposed modifications against the approved aspects of development.

TABLE 6: PROPOSED DEVELOPMENT PARTICULARS			
Project Element	Approved Development	Previous MOD (Withdrawn)	Proposed Development
Site Area	90,172.8 m ²	90,172.8 m ²	90,172.8 m ²
General	SSD - Data storage premises (>10 MW)	SSD - Data storage premises (>10 MW)	SSD - Data storage premises (>10 MW)
Primary Land Use	Data Storage Premises	Data Storage Premises	Data Storage Premises
Operation	Data centre (24/7)	Data centre (24/7)	Data centre (24/7)
Total GFA	122,546 m ²	51,062 m ² (-71,484 m ²)	64,346 m ² (-58,200 m ²)
Building Height	49.75 m	49.1 m (-0.65 m)	49.75 m (no change)
Data Shells	10 shells	6 shells (-4 shells); shells B, C, D, E increased to 67 MW each	5 shells (-5 shells); delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E



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Tree Removal	Remove: 2,131; Retain: 129	Remove: 2,137 (+6 trees); Retain: 123 (-6 trees retained)	Remove: 2,137 (+6 trees); Retain: 123 (-6 trees retained). Total trees post-planting maintained at 607, equivalent to the approved DA.
Landscaping	12,021 m ²	10,272 m ² (-1,749 m ²). Reduction accommodates ground-level infrastructure relocation (HDC, water tanks, new internal roads serving gantries). Offset through higher planting densities and 2 additional trees planted vs approved development.	11,270 m ² (-751 m ²). Reduction accommodates ground-level infrastructure relocation (HDCs, and new internal access arrangements). Offset through higher planting densities to ensure no net loss of revegetation. Supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor.
Earthworks	Net cut 89,100 m ³ ; net fill 81,600 m ³	Net cut 104,654 m ³ ; net fill 81,600 m ³ (+15,554 m ³ cut)	Net cut 104,654 m ³ ; net fill 81,600 m ³ (+15,554 m ³ cut)
Car parking	149 spaces (3 accessible, 10 bicycle)	157 spaces (4 accessible, 10 bicycle) (+8 spaces)	149 spaces (4 accessible)
Water Tanks (Southern Tank Yard)	5 tanks	8 tanks (+3 tanks)	5 tanks (consistent with approved SSD); 3 tanks relocated to centre of site to reduce visual bulk along the M4 corridor.
Infrastructure and Services	132 kV transmission; two electrical substations; potable water; stormwater management	132 kV transmission; two electrical substations; potable water; stormwater management; ground-level fuel tank farms; new gantry systems; chiller farms	132 kV transmission; on-site 22 kV substations; potable water (Section 73 Feasibility Study lodged with Sydney Water for mains amplification); stormwater management; ground-level fuel storage; reconfigured gantry systems and chiller farms to suit the consolidated layout.
Machinery and Plant	316 generators; roof-mounted mechanical plant; 4,048 kL diesel storage	273 generators; ground-level mechanical plant; 4,048 kL ground level	316 generators; mechanical plant (Hybrid Dry Coolers) relocated to ground-level positions along the



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		diesel storage; new gantry systems; chiller farms	eastern, southern and western boundaries with rooftop plant retained on Shell A ; 4,048 kL ground-level diesel storage; reconfigured gantry systems and chiller farms.
CIV	\$1,074,990,484	No change	No change
Construction Jobs	1,333	1,333	1,333
Operational Jobs	276	276	276

3.3 UPDATED DEVELOPMENT DESCRIPTION

3.3.1 Project Area

The project is located on Lot 1 DP 857249 at 51 Huntingwood Drive, Huntingwood, comprising 90,172.8 m² of E4 General Industrial. The entire site comprises the project area, with no additional buffer land required beyond the site boundaries.

The Site is bounded by:

- North: Great Western Highway
- South: M4 Motorway (direct adjoinment)
- West: Brabham Drive
- East: Woods Close

Land that will be physically disturbed

The proposed modification does not extend disturbance beyond the approved development footprint. All proposed changes occur within the existing approved site boundary (Lot 1 DP 857249, 90,172.8 m²).

No additional land beyond the approved site boundary will be physically disturbed. The modification represents an internal redesign and infrastructure optimisation of the approved development, not an expansion of the disturbance footprint.

Changes to disturbance area over time

- Construction Phase 1 (Shell A): Site establishment, demolition, earthworks, and construction of Shell A.
- Construction Phase 2 (Shells B, C, D, E): Continued earthworks, construction of Shells B, C, D, E, tech building and site infrastructure.
- Operational Phase: Ongoing operations with no further disturbance to site area.

Net earthworks increase from approved 89,100 m³ cut to proposed 104,654 m³ cut reflects inclusion of in-ground services and detailed excavation due to further progressed design .

Project area plans



Updated site plans, floor plans, elevations, sections, and cross-sections are provided in **Appendix B1** (Architectural Plans and Design Statement – Greenbox Architecture) showing:

- Project area boundary.
- Ground-level infrastructure and plant locations.
- Landscaping and setback areas.
- Internal circulation and access arrangements.

3.3.2 Physical Layout and Design

3.3.2.1 Site Preparation Works

Demolition

- Existing Endeavour Energy building and carparking demolished prior to construction (completed).

Earthworks and Civil Works

- Net cut: 104,654 m³ (+15,554 m³ increase from approved SSD); net fill: 81,600 m³ (unchanged) (excluding services trenching, pile spoil, detailed excavation). Increase reflects inclusion of in-ground services and detailed excavation due to further progressed design .
- Internal access roads and circulation areas.
- Site drainage and grading for stormwater management.

Ground-level Infrastructure

- Ground-level fuel tank farms (North and South); fire-rated, bunded, AS1940 compliant. Total diesel storage maintained at 4,048 kL, consistent with the approved SSD.
- Hybrid Dry Coolers (HDCs) relocated to ground-level positions along the eastern, southern and western boundaries . Total HDC numbers reduced from 172 to 144 to suit the consolidated five-shell layout.
- Reconfigured gantry systems and chiller farms to suit the consolidated five-shell layout
- Water tanks in the Southern Tank Yard reduced from 8 to 5 (per MOD 1), with 3 tanks relocated to the centre of the site to reduce visual bulk along the M4 corridor.

Phasing

- Phase 1: Shell A
- Phase 2: Shells B, C, D, E, tech building and site infrastructure

3.3.2.2 Built Form

Physical Layout

The consolidated data centre comprises five (5) data shells (reduced from ten (10) approved) with associated mechanical plant, office space, and ancillary infrastructure:

- **Data Shells:** Consolidated from 10 to 5 shells, delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E.
- **Mechanical Plant:** Hybrid Dry Coolers (HDCs) relocated to ground-level positions along the eastern, southern and western boundaries, with rooftop plant retained on Shell A. Total HDC numbers reduced from 172 to 144 to suit the consolidated five-shell layout.



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- **Gantry Systems:** Reconfigured gantry systems to suit the consolidated five-shell layout. Generator flues minimum 41 m above ground level, with internal and external flue arrangements.
- **Chiller Farms:** Reconfigured chiller farm arrangements to suit the consolidated layout. Ground-level fuel tanks; fire-rated, bunded, AS1940 compliant. Total diesel storage maintained at 4,048 kL.
- **Fuel Storage:** Ground-level fuel tanks; fire-rated, bunded, AS1940 compliant. Total diesel storage maintained at 4,048 kL, consistent with the approved SSD.
- **Electrical Infrastructure:** Dual electrical substations replacing the approved dual 33 kV feeder arrangement.
- **Emergency Generators:** 316 units maintained, consistent with the approved SSD. Distributed across 5 shells (Shell A: 32, Shell B: 76, Shell C: 72, Shell D: 66, Shell E: 70).
Car Parking: 149 spaces maintained, including 4 accessible spaces and 10 bicycle spaces.
- **Landscaping:** Updated strategy with 11,270 m² of native and endemic plant species, shrubs, trees and grasses. Supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor.

Building Dimensions

- Maximum Height: 49.75 m (maintained, consistent with the approved SSD)
- Gross Floor Area: 64,346 m² (reduced from 122,546 m² approved; 58,200 m² reduction)

Infrastructure

- Reconfigured gantry systems and chiller farms to suit the consolidated layout.
- Water tanks in the Southern Tank Yard reduced from 8 to 5 (per MOD 1), with 3 tanks relocated to the centre of the site to reduce visual bulk along the M4 corridor.
- Emergency generators maintained at 316 units, consistent with the approved SSD.
- Dual electrical substations replacing the approved dual 33 kV feeder arrangement.

Plans and Drawings

- Updated architectural plans showing layout and design are provided in **Appendix B1** (Architectural Plans and Design Statement – Greenbox Architecture).



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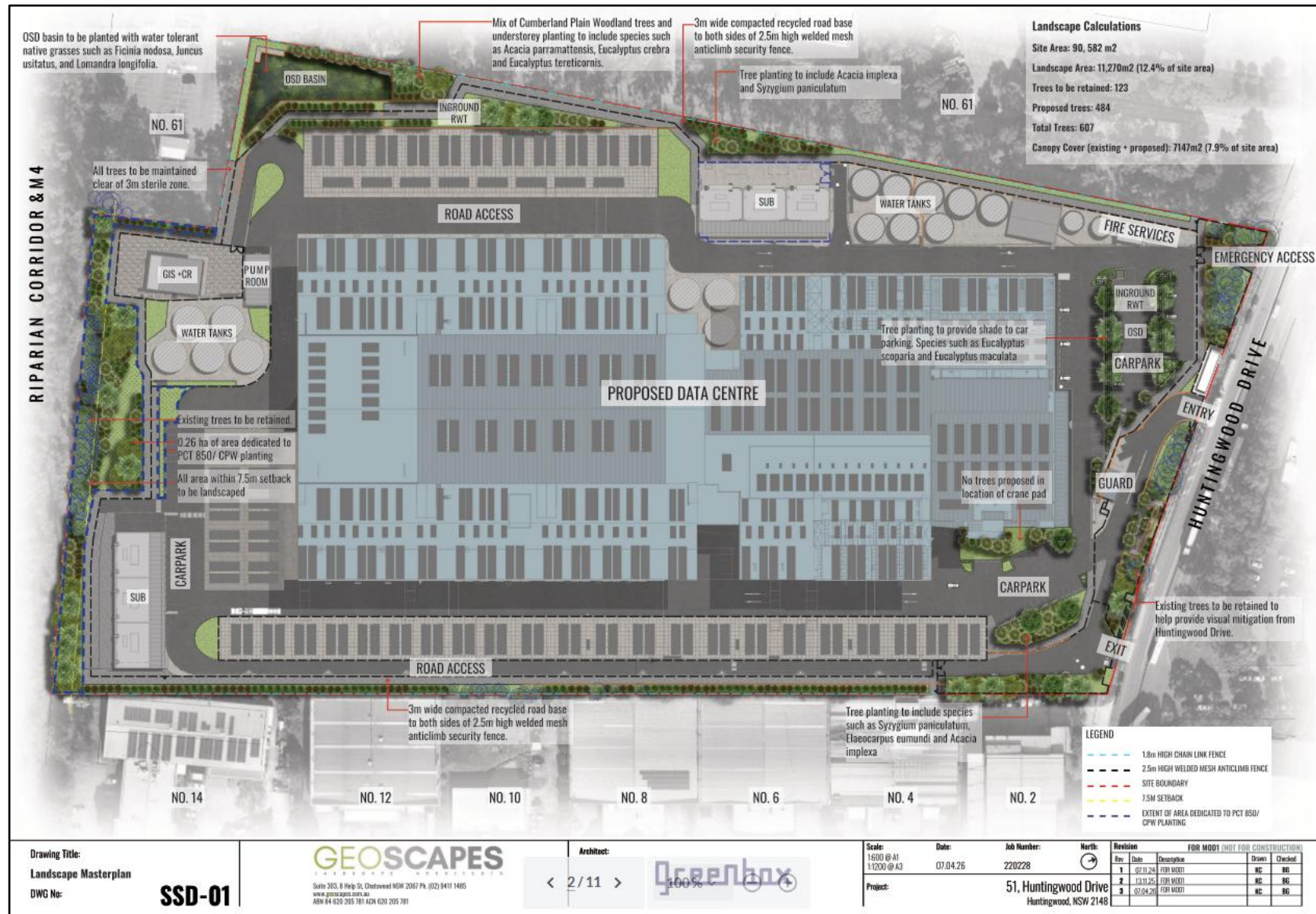


Figure 5. Updated Landscape Plans (Source: Geoscapes, 2025)



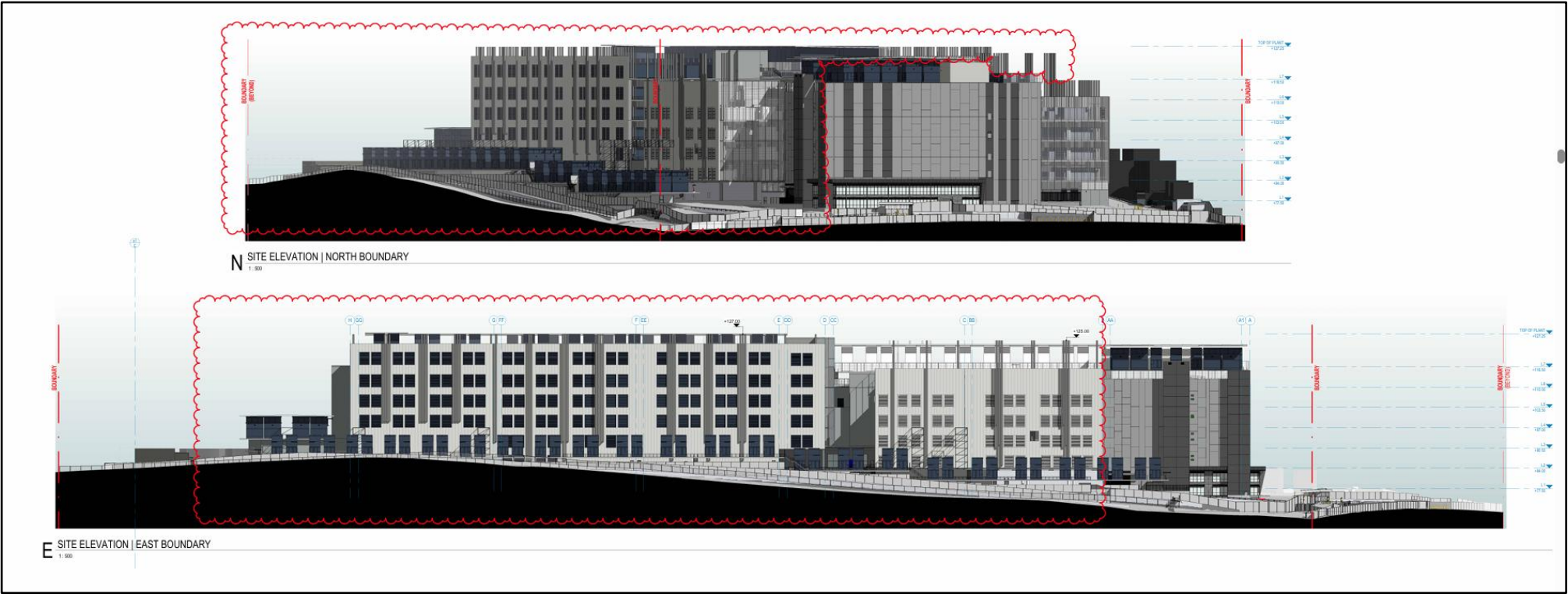


Figure 6. Site Elevation – Northern and East Boundary (Source: Greenbox, 2026)



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Figure 7. Site Elevation – Southern and Western Boundary (Source: Greenbox, 2026)



3.3.3 Use and Activities

The proposed development is a Data Storage Premises (data centre) operating 24 hours per day, 7 days per week. Construction activities include demolition, bulk earthworks (net cut 104,654 m³; net fill 81,600 m³), consolidation of data shells from 10 to 5 shells delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E, relocation of mechanical plant (Hybrid Dry Coolers) to ground-level positions along the eastern, southern and western boundaries with rooftop plant retained on Shell A, electrical systems including dual electrical substations, reconfigured gantry systems and chiller farms to suit the consolidated layout, ground-level fuel tanks, and landscaping.

Operational activities comprise high-density data storage services, continuous cooling and backup power systems (316 generators), routine maintenance, and administrative functions.

The facility comprises 64,346 m² floor area across 5 data shells (consolidated from 10 shells) with a maximum height of 49.75 m and 4,048 kL diesel storage, generating up to 276 operational jobs.

Operational traffic is 69 inbound and 69 outbound staff vehicle movements per peak hour with 149 car parking spaces (including 4 accessible spaces and 10 bicycle spaces) and separate ingress and egress points via Huntingwood Drive.

Infrastructure includes two new 2N 132 kV connections to existing Endeavour Energy feeders 93Z and 93J, on-site 22 kV substations, potable water (with mains amplification proposed via Section 73 Feasibility Study with Sydney Water), rainwater reuse for mechanical make-up water and landscape irrigation, reconfigured gantry systems and chiller farms to suit the consolidated layout, with generator flues minimum 41 m above ground level, ground-level fuel tanks (fire-rated, bunded, AS1940 compliant) with total diesel storage of 4,048 kL consistent with the approved SSD, and Hybrid Dry Coolers relocated to ground-level positions along the eastern, southern and western boundaries with rooftop plant retained on Shell A.

3.2.3.1 Hours of operation

The facility is proposed to operate 24 hours a day, seven days a week.

3.2.3.2 Staff

The proposed modification maintains the same operational staffing levels as the approved development, with up to 276 full-time equivalent operational jobs across three shifts (8:00am–4:00pm; 4:00pm–12:00am; 12:00am–8:00am). No change to employment numbers is proposed because of the consolidation and optimisation of the data centre design.

3.3.4 Timing

3.3.4.1 Staging

The approval strategy seeks to obtain Development Consent to complete the construction works over several construction stages upon issue of the relevant Construction Certificates; however, any such staging does not constitute staged development as defined under Section 4.22 of the EP&A Act, 1979.

3.3.4.2 Phases

The approximate phases and duration of works are as follows:

Phase 1 – Shell A and site infrastructure

Phase 2 – Shells B, C, D, E, tech buildings and site infrastructure



PART 4 STATUTORY CONTEXT

4.1 CONTROLS AND POLICIES OVERVIEW

This part of the Modification Report aims to highlight and address the relevant statutory requirements that are related to the proposed modifications, as noted below.

Commonwealth Planning Context

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *A Metropolis of Three Cities – Greater Sydney Region Plan*
- *Central City District Plan*
- *Future Transport Strategy 2056*
- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning & Assessment Regulation 2021* ▪ *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations (Clean Air) Regulation 2010*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*

Local Planning Context

- *Blacktown Local Environmental Plan 2015*
- *Blacktown Development Control Plan 2015*

This proposal has been carefully assessed against the requirements and objectives of all of the above planning statutory and policy documents, as detailed within this Modification Report.

4.1.1 Environmental Planning and Assessment Act 1979

The EP&A Act is the principal planning and development legislation in New South Wales. Pursuant to Part 4, the Modified Proposal is local development. The modifications sought to SSD-41589232 warrant consideration of the provisions of Section 4.55(1A) of the EP&A Act. The provisions of Section 4.55(1A) of the EP&A Act provided in **TABLE 7** below require consideration in this instance.

TABLE 7: SECTION 4.55(1A) ASSESSMENT	
Clause	Response
(1A) Modifications involving minimal environmental impact A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—	
(a) it is satisfied that the proposed modification is of minimal environmental impact, and	The proposed modifications result in minimal environmental impact. The Modified Proposal involves consolidation of data shells from 10 to 5, delivering an IT load of approximately 72 MW across shells A, B, C, D, and E, relocation of mechanical plant



TABLE 7: SECTION 4.55(1A) ASSESSMENT

Clause	Response
	(Hybrid Dry Coolers) to ground-level positions along the eastern, southern and western boundaries with rooftop plant retained on Shell A , reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout, with all works contained within the approved development footprint. Building height is maintained at the approved 49.75 m, emergency generators are maintained at the approved 316 units, bulk diesel storage is maintained at the approved 4,048 kL, and car parking is maintained at 149 spaces . Water tanks in the Southern Tank Yard have been reduced from 8 to 5 (per the previous MOD) with 3 tanks relocated to the centre of the site, reducing visual bulk along the M4 corridor. Landscaping area reduces from 12,021 m² to 11,270 m² with supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor. A Biodiversity Verification Statement (Travers bushfire & ecology) confirms no adverse biodiversity impact, with total trees post-planting maintained at 607 (equivalent to the approved DA). The modification addresses issues raised during the previous assessment process by closely aligning key parameters with the approved SSD baseline. Overall environmental outcomes are minimally affected, with equivalent or improved outcomes across all key assessment areas.
<i>(b) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and</i>	Section 4.1.1.1 of this statement demonstrates that the development as modified would result in substantially the same development as the development for which consent was granted under SSD-41589232. The development remains a data centre on the same land parcel (Lot 1 DP 857249) with unchanged 24-hour operational framework and consistent infrastructure and services arrangements. The reduction in data shells from ten (10) to five (5) represents an operational efficiency response to technological advancement rather than a fundamental change to development type or character. The building height, generator numbers, car parking provision, diesel storage, CIV, and



TABLE 7: SECTION 4.55(1A) ASSESSMENT	
Clause	Response
	employment generation all remain consistent with the approved SSD.
<i>(c) it has notified the application in accordance with— (i) the regulations, if the regulations so require, or (ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and</i>	It is understood that NSW DPHI are not required to re-notify the DA.
<i>(d) it has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.</i>	It is acknowledged that if the application is notified, NSW DPHI must consider any submissions received, concerning the proposed modifications.
<i>(3) In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15(1) as are of relevance to the development the subject of the application. The consent authority must also take into consideration the reasons given by the consent authority for the grant of the consent that is sought to be modified.</i>	The proposed modifications are consistent with the matters referred to in Section 4.15(1) of the EP&A Act.

4.1.2 Section 4.55(1A) Modification Tests

Minimal Environmental Impact

The proposed modification is considered to constitute a Section 4.55(1A) application as the Modified Proposal results in minimal environmental impact.

The Modified Proposal results in significant quantitative reduction to the approved built form, with Gross Floor Area reduced from 122,546 m² to 64,346 m² (58,200 m² reduction) whilst maintaining the approved maximum building height of 49.75 m. Any environmental impacts associated with the approved built form are therefore reduced.

The Modified Proposal retains the same 24-hour operational framework as the approved development, with no change to operational hours or intensity. Operational vehicle movements remain consistent with the approved development at 69 inbound and 69 outbound staff vehicle movements per peak hour, plus up to 12 heavy rigid vehicle movements per day, resulting in no increase to vehicular activity.

Car parking is maintained at 149 spaces, consistent with the approved SSD. Emergency generators are maintained at 316 units, consistent with the approved SSD. Bulk diesel storage is maintained at 4,048 kL, consistent with the approved SSD. Air quality scope remains consistent with the approved SSD, with updated modelling (Northstar Air Quality) using the refined Janssen NO_x-to-NO₂ conversion methodology (accepted by the NSW EPA during the previous assessment process) demonstrating full compliance with contemporary impact assessment criteria across the modelling domain. Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA), with approved noise



conditions retained - no new sources or operational changes warrant departure from the approved consent. Updated acoustic modelling (Pulse White Noise Acoustics) demonstrates full compliance at all receivers, subject to installation of an acoustic louvre to the eastern side of the Shell A rooftop.

The Site is in an industrial precinct with no residential zoned land in proximity. The Modified Proposal will not result in any change to overshadowing, visual bulk, traffic, noise, or other amenity impacts on sensitive receivers compared to the approved development. The building height is maintained at the approved 49.75 m, consistent with the approved building envelope, with no adverse visual or amenity impacts.

All works occur within the approved site boundary, with no disturbance extending beyond the approved development footprint. Landscaping area reduces from 12,021 m² to 11,270 m² with supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor. Water tanks in the Southern Tank Yard have been reduced from 8 to 5 (per the previous MOD) with 3 tanks relocated to the centre of the site, materially reducing visual bulk along the M4 corridor. Tree removal increases minimally from 2,131 to 2,137 (+6 trees), representing a minimal change to approved biodiversity outcomes with no additional offset requirements triggered. Total trees post-planting are maintained at 607, equivalent to the approved DA. The Biodiversity Verification Statement (Travers bushfire & ecology) confirms no increased impact on biodiversity values.

The modification addresses issues raised during the previous assessment process - including air quality, acoustics, biodiversity, lithium-ion battery storage, building height, water tanks, cooling systems, stormwater, and greenhouse gas considerations - by closely aligning key parameters with the approved SSD baseline wherever possible.

Given the above, the Modified Proposal is considered to result in minimal environmental impact and therefore constitutes a Section 4.55(1A) modification.

Substantially the Same

The Modified Proposal retains the fundamental character and purpose of the approved development. The development remains a data centre located at the same location on the same land parcel (Lot 1 DP 857249), with unchanged 24-hour operational framework. The hours of operation and primary function remain identical to the approved development.

Whilst the Modified Proposal results in quantitative changes to built form (Gross Floor Area reduced from 122,546 m² to 64,346 m²), the approved building height of 49.75 m, car parking provision of 149 spaces, emergency generator numbers of 316 units, diesel storage of 4,048 kL, CIV of \$1,074,990,484, and employment generation (1,333 construction and up to 276 operational jobs) all remain consistent with the approved SSD. These modifications represent operational efficiency improvements and layout optimisation rather than a fundamental change to development character.

The consolidation from 10 to 5 data shells delivering an IT load of approximately 72 MW across shells A, B, C, D, and E reflects technological advancement in data centre design and higher-density rack configurations, not a transformation of development type. The reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout, relocation of mechanical plant (Hybrid Dry Coolers) to ground-level positions along the eastern, southern and western boundaries with rooftop plant retained on Shell A, replacement of the approved dual 33 kV feeder arrangement with on-site 22 kV substations supplied by two new 2N 132 kV connections to existing Endeavour Energy feeders, and reduction of water tanks in the Southern Tank Yard from 8 to 5 represent infrastructure optimisation aligned with contemporary industry standards, maintaining the fundamental identity of the development as a data storage facility.



The Modified Proposal maintains consistent infrastructure and services arrangements with the approved development, including electrical transmission, potable water supply, stormwater management, and waste management systems. The relocation of mechanical plant to ground level, reconfiguration of gantry systems and chiller farms, and on-site 22 kV substations represent operational optimisation within the approved site boundary, not development intensification.

Tree removal increases minimally from 2,131 to 2,137 trees (+6 additional trees), representing negligible change to approved landscaping outcomes. Total trees post-planting are maintained at 607, equivalent to the approved DA. The development retains its identity as a data centre with associated office space, infrastructure, and services.

4.1.3 Section 4.15 – Reasons given by the consent authority for the grant of the consent

TABLE 8: SECTION 4.15(1)(A) CONSIDERATIONS	
Section	Response
<i>Section 4.15(1)(a)(i) any environmental planning instrument, and</i>	Refer to Section 5 of this statement.
<i>Section 4.15(1)(a)(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and</i>	There are no applicable draft instruments for consideration.
<i>Section 4.15(1)(a)(iii) any development control plan, and</i>	Refer to Section 5 of this statement.
<i>Section 4.15(1)(a)(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and</i>	Not applicable.
<i>Section 4.15(1)(a)(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),</i>	Not applicable.
<i>Section 4.15(1)(b)-(c)</i>	Refer to PART 6 of this statement.

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a development application. The relevant matters for consideration under Section 4.15(1) of the EP&A Act are provided in **TABLE 7** below

4.1.4 Section 4.15 – Reasons given by the consent authority for the grant of the consent

This application has been prepared in accordance with the provisions of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation).



PART 5 ENGAGEMENT

Prior to lodgement of this modification application, Willowtree Planning has engaged with Blacktown City Council to brief them on the withdrawal of previous MOD 1 and the proposed new modification. On 30 March 2026, Willowtree Planning notified Council that MOD 1 had been withdrawn and that a revised modification application would be lodged, providing a high-level overview presentation of the proposed changes. A follow-up project meeting was held with Council on 17 April 2026 to walk through the proposed modification in detail. The meeting was positive, with Council noting the consolidation and rationalisation of the development and the alignment of key parameters with the approved SSD baseline. No outstanding concerns were raised that would prevent progression of the application.



PART 6 ASSESSMENT OF IMPACTS

The following subsections provide an updated assessment of potential impacts, with consideration of the amended proposal, as described in **PART 3** of this Modification Report.

TABLE 9 is included to recognise the SEARs for **SSD-41589232**, dated 2 May 2022, and those matters that have been reassessed.

TABLE 9: UPDATE ON SEARs ITEMS	
SEARs Items	Updated Assessment
1. Statutory and strategic context	Not applicable – no relevant changes are proposed.
2. EDC and Employment	Not applicable – no relevant changes are proposed.
3. Design Quality	Modification improves design quality through data shell consolidation (10 to 5), relocation of mechanical plant (Hybrid Dry Coolers) to ground level along the eastern, southern and western boundaries for improved maintenance access and operational coordination, reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout. The modification addresses issues raised during the previous assessment process by closely aligning key parameters with the approved SSD baseline. Overall design delivers contemporary data centre standards and operational efficiency.
4. Built Form and Urban Design	Modification consolidates data shells from 10 to 5 delivering an IT load of approximately 72 MW across shells A, B, C, D, and E. Gross Floor Area reduced from 122,546 m ² to 64,346 m ² (58,200 m ² reduction). Maximum building height maintained at the approved 49.75 m, consistent with the approved building envelope. Relocation of Hybrid Dry Coolers to ground level and introduction of on-site 22 kV substations improves design efficiency.
5. Visual Impact	The Visual Impact Addendum confirms no material increase in adverse visual impacts. Deletion of data hall shells reduces perceived bulk and improves landscape screening. Building height is maintained at the approved 49.75 m with no adverse visual or amenity impacts. Water tanks in the Southern Tank Yard reduced from 8 to 5 (per the previous MOD) with 3 tanks relocated to the centre of the site, materially reducing visual bulk along the M4 corridor. Supplementary landscaping along the southern boundary retained and enhanced for screening from the M4 corridor. No significant adverse visual impacts identified.
6. Traffic, Transport and Accessibility	Modified car park configuration maintains approved traffic movement and generation



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	outcomes. Car parking maintained at 149 spaces, consistent with the approved SSD . Updated Traffic Impact Assessment confirms negligible impact on road network. Operational vehicle movements comprise 69 inbound and 69 outbound staff vehicle movements per peak hour, plus up to 12 heavy rigid vehicle movements per day.
7. Trees and Landscaping	Tree removal increases by 6 trees (from 2,131 to 2,137), with tree retention correspondingly decreasing from 129 to 123 trees. Total trees post-planting maintained at 607, equivalent to the approved DA. The 6 additional trees are required for the Sydney Water incoming valve arrangement along Huntingwood Drive. Landscaping area reduces from 12,021 m ² to 11,270 m ² . Supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor.
8. Ecologically Sustainable Development	Modification delivers improved operational efficiency through higher-density rack configurations, reduced built form, and ground-level mechanical plant positioning . Rainwater harvesting (1 x 335 kL and 1 x 100 kL inground tanks) provides non-potable water for mechanical make-up and landscape irrigation. Environmental performance maintained or improved across all key categories.
9. Biodiversity	Tree changes affect planted native vegetation only, not remnant Cumberland Plain Woodland. The 6 additional trees required for removal are within planted native vegetation areas. No additional biodiversity offset requirements. All originally approved offset obligations remain satisfied. Updated Biodiversity Verification Statement (Travers bushfire & ecology) confirms no increased impact on biodiversity values and that, in accordance with Section 7.17 of the Biodiversity Conservation Act 2016, a new or updated BDAR is not required.
10. Back-up Power System	Emergency generators maintained at 316 units, consistent with the approved SSD. Generators distributed across 5 shells (Shell A: 32, Shell B: 76, Shell C: 72, Shell D: 66, Shell E: 70) with all generator flues minimum 41 m above ground level. Maintains operational backup capability.
11. Air Quality	Air quality scope remains consistent with the approved SSD. Updated modelling (Northstar Air Quality) using the refined Janssen NO _x -to-NO ₂ conversion methodology accepted by the NSW EPA during the previous assessment process demonstrates full compliance with contemporary impact assessment criteria across the modelling



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	domain. The generator testing regime comprises three (3) generators tested simultaneously (one per generator bank) at 100% load from 07:00 to 18:00 (Monday to Friday), consistent with MCoA Condition B1 and the approved SSD testing arrangement. Generators will not operate for more than 200 hours per year, consistent with the POEO (Clean Air) Regulation 2022 Cl. 73 exemption for emergency standby plant. Updated specialist report provided.
12. Noise and Vibration	Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA). Approved noise conditions retained - no new sources or operational changes warrant departure from the approved consent. Updated acoustic memorandum (Pulse White Noise Acoustics) demonstrates full compliance at all receivers, subject to installation of an acoustic louvre to the eastern side of the Shell A rooftop.
13. Ground and Water Conditions	Not applicable – no relevant changes are proposed.
14. Stormwater and Wastewater	Updated Integrated Water Cycle Management Plan provided (van der Meer Consulting). MUSIC modelling demonstrates all Blacktown City Council WSUD pollution reduction targets are achieved or exceeded - Total Suspended Solids 85.0% (target 85%), Total Phosphorus 70.0% (target 65%), Total Nitrogen 65.9% (target 45%), and Gross Pollutants 97.9% (target 90%) . No material difference in stormwater quality outcomes from the approved SSD, consistent with Condition B39 of the Development Consent.
15. Flooding Risk	No flood risk applies to the site. The site is at a localised high point within the catchment and falls outside all flooding precincts identified in Blacktown City Council's flood mapping and the Hawkesbury-Nepean Valley PMF data maintained by the NSW SES.
16. Hazards and Risk	Updated Hazards and Risk Assessment Report (SLR Consulting) confirms residual risks (diesel storage and lithium-ion batteries) remain Negligible to ALARP with implementation of control measures. Diesel storage of 4,048 kL complies with AS1940:2017. The report addresses lithium-ion battery storage (893,000 kg across 316 Power Train Units), thermal runaway risk, emergency response and Fire & Rescue NSW Emergency Plan requirements, addressing the matters raised by the NSW EPA during the previous assessment process. All hazard controls standard industry practice.
17. Contamination and Remediation	No contamination or remediation concerns arise. Site is cleared industrial land with no



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	contamination constraints.
18. Waste Management	Waste management reviewed and updated. Arrangements consistent with approved development. An operational Waste Management Plan addressing lithium-ion battery storage and disposal will be prepared in accordance with conditions of consent.
19. Aboriginal Cultural Heritage	No items of Aboriginal cultural heritage significance identified on site.
20. Environmental Heritage	No items of non-Aboriginal environmental heritage significance identified on site.
21. Social Impact	Modification maintains 1,333 construction jobs and up to 276 operational jobs. Employment generation outcomes consistent with approved development. No adverse social impacts identified.
22. Infrastructure Requirements and Utilities	Updated Infrastructure Requirements Report (van der Meer Consulting) confirms electrical (including new 2N 132 kV connections to existing Endeavour Energy feeders 93Z and 93I and on-site 22 kV substations), water (with mains amplification proposed via Section 73 Feasibility Study with Sydney Water), stormwater, sewer, and telecommunications systems adequate for modified development. Ground-level fuel tanks comply with AS1940 standards.
23. Bush Fire Risk	Not applicable – no bushfire risk identified. Site is within industrial precinct.
24. Construction, Operation and Staging	Construction phasing: Phase 1 (Shell A), Phase 2 (Shells B, C, D, E, tech building, site infrastructure). Operational framework unchanged (24 hours per day, 7 days per week). Net earthworks cut increases from 89,100 m ³ to 104,654 m ³ . Net fill unchanged at 81,600 m ³ .
25. Contributions and Public Benefit	Modification maintains strategic employment generation (1,333 construction and up to 276 operational jobs) and supports Greater Sydney's data storage demand through efficient industrial land utilisation.
26. Engagement	Prior to lodgement, Willowtree Planning notified Blacktown City Council of the withdrawal of the previous and the proposed new modification on 30 March 2026, providing a high-level overview presentation. A follow-up project meeting was held with Council on 17 April 2026 to walk through the proposed modification in detail. The meeting was positive, with Council noting the consolidation and rationalisation of the development and the alignment of key parameters with the approved SSD baseline. No outstanding concerns were raised that would prevent progression of the application.



27. Economic Impact	Modification delivers operational efficiency improvements and positions facility for long-term competitiveness. CIV maintained at \$1,074,990,484. Construction employment 1,333 FTE. Operational employment up to 276 FTE.
28. Suitability of the Site	Site remains suitable for modified development. E4 zoning supports data centre use. No heritage, flood, contamination, or other environmental constraints apply. Industrial location compatible with proposed use.
29. Greenhouse Gas and Energy Efficiency	No increase to operational capacity. GHG assessment methodology clearly documented in the modification application. Modification improves operational efficiency through higher-density configurations and reduced overall built form.

6.1 UPDATED ASSESSMENT OF IMPACTS

6.2 NOISE AND VIBRATION QUALITY

An updated acoustic review has been prepared by Pulse White Noise Acoustics (PWNA) on behalf of AW Edwards to support this modification (Memorandum). The review remodels the modified scheme using the updated architectural drawings (Greenbox Architecture) and assesses the resulting noise impacts at surrounding receivers against the noise criteria set out in the Blacktown DCP 2015 and the NSW *Noise Policy for Industry* (NPfI).

The acoustic review specifically addresses:

- The rearrangement and redistribution of building shells across the site; and
- The relocation of a portion of the Hybrid Dry Coolers (HDCs) from rooftop to ground level along the eastern, southern and western boundaries.

The mechanical plant assessed under the modification has been updated as summarised below. The reduction in HDC numbers reflects the consolidated five-shell layout.

TABLE 10: EQUIPMENT CHANGES FROM THE APPROVED SSD

Equipment	Approved (SSD-41589232)	MOD 2
Hybrid Dry Coolers (HDCs)	172	144
Water Cooled Chillers	86	-
Standby emergency generators	316	316

Updated noise modelling confirms that the modified development achieves full compliance with the Blacktown DCP 2015 and NSW NPfI noise criteria at all surrounding receivers across both daytime and night-time operational scenarios. A summary of predicted noise levels at the most affected receivers is provided below (worst-case daytime scenario with **three (3) generators** operating).



TABLE 11: PREDICTED NOISE LEVELS AT MOST AFFECTED RECEIVERS

Receiver	Type	Daytime Criterion (dBA)	Predicted (Approved)	Predicted (MOD 2)	Difference
R1	Residential (Alpha Hotel Eastern Creek)	62	56	56	0
CC1	Childcare (Grace Village)	60	58	60	+2
14	Industrial (10 Healy Cct)	68	56	68	+12
19	Industrial (52 Huntingwood Dr)	68	53	68	+15
113	Industrial (26 Brabham Dr)	68	56	67	+11

The minor predicted increases at industrial receivers and the childcare centre are attributable to the relocation of mechanical plant from rooftop to ground level (i.e. removal of the building obstruction previously provided by rooftop placement). Despite these increases, all predicted noise levels remain at or below the applicable Blacktown DCP 2015 and NSW NPfl criteria, and the residential receiver (R1) is unaffected.

Compliance is predicated on the implementation of the following measures, which represent minor refinements to the management controls established under the original SSDA Acoustic Assessment Report (PWNA, R8, 26 April 2023):

- Installation of an acoustic louvre to the eastern side of the Shell A rooftop (extending to a height in line with the tops of the HDC units, with no gaps or cutouts along the bottom edge);
- Generator testing limited to daytime hours (7am–6pm) for a maximum of 15 minutes in each hour;
- A maximum of three (3) generators operating simultaneously during testing;
- Generators provided as packaged units with attenuators on air intakes and mufflers/attenuators on exhaust ducts, complying with the sound power levels set out in the memorandum; and
- HDC sound power levels at or below those nominated for each of the day, evening and night periods, to be confirmed at detailed design stage.

The acoustic review confirms that the modified development achieves full compliance with the Blacktown DCP 2015 and NSW NPfl noise criteria at all surrounding receivers, subject to implementation of the recommended noise control measures. The acoustic performance requirements, treatments and management controls established under the original SSDA Acoustic Assessment Report remain suitable for the modified project, with the addition of the Shell A rooftop acoustic louvre. The approved SSD consent noise criteria (62/60/58 dBA day/evening/night for R1) are retained without amendment. Refer to **Appendix B4** for the full memorandum.

6.3 AIR QUALITY

An updated Air Quality Impact Assessment Addendum has been prepared by Northstar Air Quality Pty Ltd on behalf of AW Edwards to support this modification. The addendum assesses the potential air quality impacts of the modified scheme against the NSW EPA *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* and the contemporary NSW EPA impact assessment criteria.



The approved SSD authorises 316 no. 2,000 kWe diesel-fuelled generators (MTU 16V4000G76F), which is retained unchanged under this modification. All generator performance specifications (discharge rates, volumetric flow rate, temperature, efflux velocity) likewise remain as approved. From an air emissions perspective, the changes relevant to the assessment are limited to a reconfigured datacentre shell layout, a minor change in shell heights, and a minor change in generator flue discharge heights (from 34.5 m and 41.0 m AGL to 41.0–43.0 m AGL). Routine maintenance testing remains at three (3) generators simultaneously (one per generator bank, A to E), consistent with MCoA Condition B1 and the approved SSD testing arrangement. A summary of the assessment inputs is provided below in **TABLE 12**.

TABLE 12: SUMMARY OF AIR QUALITY ASSESSMENT INPUTS		
Parameter	Approved (SSD-41589232)	MOD 2
Generator model	MTU 16V4000G76F	MTU 16V4000G76F
Generator capacity	2,000 kWe	2,000 kWe
Number of generators	316	316
Discharge height (m AGL)	34.5 and 41.0	41.0 to 43.0
Scenario 1 (Emergency) – generators operating simultaneously	316	316
Scenario 2 (Maintenance testing) – generators operating simultaneously	3	3 (one per generator bank, A to E)
Maintenance testing hours per year	Consistent with MCoA Condition B1	Consistent with MCoA Condition B1
NO _x to NO ₂ conversion method	OLM	Janssen
Meteorological and background year	2019	2019

The assessment has been undertaken against the current NSW EPA impact assessment criteria, noting that the NO₂ criteria have been revised by the NSW EPA since the original AQIA was prepared (1-hour criterion reduced from 246 µg·m⁻³ to 164 µg·m⁻³; annual criterion reduced from 62 µg·m⁻³ to 31 µg·m⁻³). Consistent with the methodology accepted by the NSW EPA during the MOD 1 assessment process, the Janssen NO_x-to-NO₂ conversion method has been applied. Two operational scenarios have been modelled: **Scenario 1** – simultaneous emergency operation of all 316 generators at 100% load, representing worst-case conditions during a power outage; and **Scenario 2** – maintenance testing with three generators operating simultaneously at 100% load. Consistent with the exemption under Clause 73, Part 5, Division 6 of the *Protection of the Environment Operations (Clean Air) Regulation 2022*, the generators will not operate for more than 200 hours per year.

The maintenance testing regime is consistent with the approved SSD testing arrangement under MCoA Condition B1, with three (3) generators tested simultaneously (one per generator bank) from 07:00 to 18:00 (Monday to Friday). Updated modelling demonstrates full compliance with all relevant NSW EPA impact assessment criteria across the modelling domain.

The assessment predicts generally improved environmental outcomes across the wider assessment domain compared with the original (approved) AQIA under both emergency and maintenance testing scenarios, for both 1-hour and annual averaging periods. Under Scenario 1 (emergency operations), predicted 1-hour NO₂ concentrations show a general reduction at receptor locations when compared with the approved outcomes, and the resultant probabilities of exceedance (when considered against System Average Interruption Duration Index data) are lower than those previously approved. Under Scenario 2 (maintenance testing), no exceedances of the 1-hour NO₂ impact assessment criterion are predicted at any receptor location and predicted 24-hour average PM₁₀ and PM_{2.5} concentrations are below the applicable impact assessment criteria. The conclusions drawn for NO₂ are considered applicable to other combustion-related pollutants assessed over similar averaging periods, including sulphur dioxide, carbon monoxide and relevant volatile organic compounds.



The re-alignment of the building shells results in a small area of less favourable outcomes principally to the east of the site, attributable to localised building downwash effects. The residual risk associated with these localised outcomes can be readily managed through the application of an operational condition restricting maintenance testing during periods of elevated background NO₂ concentrations, if required.

The addendum AQIA confirms that the modified development does not predict any exceedances of the relevant impact assessment criteria and represents an improved outcome compared with the approved SSD. Refer to **Appendix B5** for the full report.

6.4 BCA COMPLIANCE

A BCA compliance assessment prepared by McKenzie Group Consulting has reviewed the proposed modifications to the Air Trunk 1 SYD 3 Data Centre against BCA 2022 (with Section J: BCA 2019), as locked in by the previously issued Construction Certificates. The report assesses the modified building design comprising five (5) data shells across a seven-storey main building (Parts A and B) with associated office portions, open air car parking, and ancillary outbuildings including guard kiosk, fire pump room, IW pump rooms, substations, and GIS switchroom.

The assessment confirms that the proposed modifications are capable of achieving compliance with the BCA through a combination of deemed-to-satisfy (DTS) solutions and performance solutions. The existing performance solution assessment report will be updated to incorporate the changes from this consent modification prior to the issuance of the Construction Certificates.

The BCA report identifies a number of areas that deviate from the DTS provisions, which are to be addressed through performance solutions demonstrating compliance with the relevant Performance Requirements of the BCA. These items are summarised in the table below.

TABLE 13 Summary of BCA Deemed-to-Satisfy Deviations:

TABLE 13: SUMMARY OF BCA DEEMED-TO-SATISFY DEVIATIONS			
Item	Description	DTS Clause	Performance Requirement
1	Fire Compartment Size – Oversize fire compartment (up to 18,100 m ² within main building and up to 5,366 m ² to external gantry).	C3D3	C1P1, C1P2
2	Door Hardware – Security locking devices incorporated within path of travel doors (data hall fire doors) as part of the building security.	D3D26	D1P2
3	Services Penetrations – 2-hour fire rating in lieu of 4 hours within 4-hour building elements (wall and floor) due to limitation of existing tested systems; services penetration within external gantry floor slab not fire sealed; use of non-tested system for fire seal of services penetration.	C4D15	C1P2, C1P8
4	Extended Travel Distances to a Point of Choice and to an Exit – Exceedances of DTS travel distances across multiple levels and shells (refer to BCA report for detailed distances).	D2D5	D1P4, E2P2



TABLE 13: SUMMARY OF BCA DEEMED-TO-SATISFY DEVIATIONS

Item	Description	DTS Clause	Performance Requirement
5	Distance Between Exits – Exceedances of the 60 m DTS requirement across multiple levels and shells (up to 122 m between exits).	D2D6	D1P4, E2P2
6	Egress Width – Reduced egress width of less than 1 m (minimum 850 mm achieved) around plant and equipment.	D2D8	D1P4, D1P6
7	Fire Hydrant – Adoption of AS 2419.1-2021 (building exceeds 108,000 m ³ with special hazards); fire hydrants located outside of fire stairs; hydrant coverage shortfall (two hose lengths); fire hydrant and sprinkler booster assembly location.	E1D2, E1D5	E1P3, E1P4
8	Fire Hose Reel – Omission of fire hose reel within data halls, GIS switchroom and substation buildings, to be replaced with fire extinguishers.	E1D3	E1P1
9	Sprinkler System – Omission of sprinkler protection within generators on the gantries and low voltage switchrooms on the roof top (Shell A).	E1D4	E1P4
10	Fire Precaution During Construction – Two separate fire hydrant systems (including separate booster assembly) for the new and existing buildings during construction staging.	E1D16	E1P3, E1P4
11	Zone Smoke Control System – Omission of zone smoke control within the main building areas.	E2D6	E2P2
12	Stair Pressurisation System – Omission of stair pressurisation system to fire isolated exits.	E2D4	E2P2
13	Sound System and Intercom Systems for Emergency Purpose – Speech intelligibility removed; WIPs provided at fire stair entries only; EWIS zoning increased to 2,200 m ² in lieu of 2,000 m ² .	E4D9	E4P3
14	Sprinkler System Concession – Omission of 1-hour fire rated spandrel (C3D7 vertical separation of openings); reduced critical radiant flux and additional material group permitted (Specification 7 fire hazard properties).	E1D13, C3D2, C3D7, Spec 7, E1D2	E1P4, C1P1, C1P2, C1P4, E1P3
15	Fire Isolated Exits Re-entry – Door hardware requirements relevant to re-entry provisions for fire isolated exits.	D3D27	D1P2, D1P5



TABLE 13: SUMMARY OF BCA DEEMED-TO-SATISFY DEVIATIONS			
Item	Description	DTS Clause	Performance Requirement
16	Special Hazard – Special hazard provisions for in-rack lithium, bulk diesel tanks, and solar panels.	E1D17, E2D21	E2P2
17	Fire Isolated Exits – Exits do not extend to upper plant of Level 6 (Shell A); access into fire stair from office area (sole occupancy unit) at Level 1; discharge into covered area at Level 2 with travel exceeding 20 m; openings within 6 m of discharge at Level 2 unprotected.	D2D12	D1P4, D1P5, E2P2
18	Travel via Non-Fire Isolated Exits – Total travel distance via non-fire isolated and fire isolated exits from Level 6 upper level plants and Shell E Level 4 plant area exceeds 80 m (up to 104 m).	D2D14	D1P4, E2P2
19	GIS Switch Rooms Doors – GIS switchroom fitted with fire activated bolt to maintain FRL and not be readily openable without a key.	D3D26	D1P2

The BCA report confirms that each identified deviation is capable of being addressed through a performance solution prepared by the project's Fire Safety Engineer, and that the modified scheme can achieve compliance with the BCA through a combination of DTS and performance solutions. Refer to **Appendix B11** for the full report.

6.5 INFRASTRUCTURE AND SERVICES

An updated Infrastructure Requirements Report has been prepared by van der Meer Consulting on behalf of AW Edwards to support this modification. The report addresses SEARs Issue 22 and assesses the infrastructure servicing requirements of the modified development against the existing utility network. A summary of the servicing strategy for each utility is provided below, with further detail on the key utilities following.

TABLE 14: SUMMARY OF UTILITY SERVICING STRATEGY		
Utility	Existing Capacity	MOD 2 Servicing Strategy
Electricity	Inadequate	New 2N 132 kV connection to Endeavour Energy feeders 93Z and 9J1; new 132 kV switching station and on-site 22 kV substations
Portable Water	Inadequate	Upgrade of Ø250 mm Sydney Water main via Section 73 Feasibility Study; 24-hour on-site water storage (19,600 kL across 16 tanks)
Sewer	Adequate	Connection to existing Ø225 mm main via gravity drainage (no pump stations); Section 73 application required
Stormwater	Upgrade required on-site	Three discharge pipes (Ø375, Ø675, Ø450); OSD Tank A (1,100 m ³) and OSD Basin B (1,400 m ³); WSUD treatment train



TABLE 14: SUMMARY OF UTILITY SERVICING STRATEGY

Utility	Existing Capacity	MOD 2 Servicing Strategy
Telecommunications	Adequate	Four boundary lead-ins (two from Huntingwood Drive, two from the M4); NBN service; internal campus pit and duct ring
Gas	N/A	No connection required; existing Jemena main on Huntingwood Drive unaffected

Electrical demand is estimated at 400 MVA, requiring two new 2N 132 kV connections to Endeavour Energy feeders 93Z and 9J1, a new 132 kV switching station adjacent to transmission towers 17 and 20, and on-site 22 kV substations at the southern boundary. Endeavour Energy has provided a Connection Offer and Project Definition accepting the required asset upgrades, which are to be designed, constructed and funded by the connection customer. Each shell will be provided with independent diesel generators, UPS systems and dedicated bulk fuel systems, with total site fuel storage of approximately 4,048 kL consistent with the Hazards and Risk Assessment Report.

The existing Sydney Water Ø250 mm potable water main is inadequate for the critical water flow rate of 147.4 L/s, with mains amplification upgrades to be confirmed via a Section 73 Feasibility Study. The site layout incorporates 19,600 kL of 24-hour critical water storage (across 16 tanks) and rainwater harvesting via 1 x 335 kL and 1 x 100 kL inground tanks, processed through a filtration plant for reuse as mechanical make-up water and landscape irrigation. The existing Ø225 mm sewer main can accommodate the peak sewer drainage rate of 14.7 L/s via gravity drainage.

Telecommunications will be serviced via four boundary lead-ins (two from Huntingwood Drive and two from the M4) spaced 150 m apart, with an internal campus pit and duct ring and an NBN service provided. The existing Endeavour Energy microwave communications tower in the south-east corner will be decommissioned and demolished. No gas connection is proposed, with the existing Jemena main along Huntingwood Drive unaffected.

The Infrastructure Requirements Report confirms that the modified development can be adequately serviced by the existing utility network subject to the electrical and water mains upgrades described above, and that the infrastructure delivery strategy appropriately addresses SEARs Issue 22. Refer to **Appendix B9** for the full report.

6.6 LANDSCAPING

Updated landscape documentation has been prepared by Geoscapes to support this modification. The landscape strategy has been revised to accommodate the consolidated five-shell layout and supporting infrastructure, while maintaining overall canopy coverage and plant numbers equivalent to the approved development. A summary of the key landscape parameters is provided below.

TABLE 15: SUMMARY OF LANDSCAPE PARAMETERS

Parameter	Approved (SSD-41589232)	MOD 2
Landscape area	12,021 m ² (13.3% of site)	11,270 m ² (12.5% of site)
Trees retained	129	123
Proposed new plantings	478	484
Total trees post-planting	607	607
Canopy coverage	7,147 m ² (7.9% of site)	7,147 m ² (7.9% of site)
Additional trees requiring removal	–	6 (net)

The key changes with respect to landscaping is as follows:



- Landscape area reduced by 751 m² to accommodate ground-level infrastructure relocation required by the consolidated data centre design (principally mechanical plant at ground and roof level, and internal access arrangements serving the consolidated shells);
- Supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor;
- 6 additional trees to be removed to accommodate the Sydney Water incoming valve arrangement along Huntingwood Drive (7 newly required for removal; 1 previously approved for removal now retained);
- Marginally higher planting densities at some locations to ensure no net loss of revegetation, with total trees post-planting maintained at 607 (equivalent to the approved DA).

The updated landscape strategy incorporates native and endemic species suited to Cumberland Plain Woodland communities, including *Acacia parramattensis*, *Eucalyptus crebra*, *Eucalyptus tereticornis*, *Eucalyptus maculata*, *Syzygium paniculatum*, *Elaeocarpus eumundi*, *Acacia implexa* and *Melaleuca decora*. Car park tree species (*Eucalyptus scoparia*, *Eucalyptus maculata*) are selected to provide shade. OSD basin planting incorporates water-tolerant native grasses including *Ficinia nodosa*, *Juncus usitatus* and *Lomandra longifolia*.

The updated Biodiversity Verification Statement (Travers bushfire & ecology) confirms that the 6 additional trees affected are located within planted native vegetation, not remnant Cumberland Plain Woodland (PCT 850/3319), and no additional biodiversity offset requirements are triggered. All originally approved ecosystem and species credits have been retired. CPHR has confirmed that the modification is unlikely to increase the impact on biodiversity values and, in accordance with Section 7.17 of the *Biodiversity Conservation Act 2016*, a new or updated BDAR is not required.

Landscape establishment and maintenance will be undertaken in accordance with an updated Landscape Management Plan. Refer to **Appendix B2** for the updated landscape documentation.

6.7 BIODIVERSITY

A Biodiversity Verification Statement has been prepared by Travers bushfire & ecology to assess impacts on biodiversity outcomes from the proposed modification.

The modification requires removal of 6 additional trees (net) near the site entrance to accommodate the Sydney Water incoming valve arrangement along Huntingwood Drive. Specifically, 7 trees not previously approved for removal are now required to be removed, and 1 tree previously approved for removal will now be retained, resulting in a net increase of 6 additional trees. Tree removal increases from 2,131 to 2,137 trees, with tree retention correspondingly decreasing from 129 to 123 trees. All tree changes are in planted native vegetation areas, not remnant Cumberland Plain Woodland (PCT 850/3319).

Canopy coverage is 7,147 m² (7.9% of site area), with landscape area of 11,270 m² (12.4% of site area). Landscaping area reduces from 12,021 m² to 11,270 m² to accommodate ground-level infrastructure relocation, including mechanical plant positioning, and new internal access roads serving the consolidated data shells. Despite this reduction, the total number of trees post-planting is maintained at 607 (123 retained plus 484 proposed), equivalent to the approved DA. Plantings will be at marginally higher densities at some locations to ensure no net loss of proposed revegetation and landscaping, maintaining visual screening outcomes. Supplementary landscaping along the southern boundary has been retained and enhanced for screening of water tanks and infrastructure from the M4 corridor.

All Sydney Water infrastructure piping is located underground with no impact to trees or landscaping.



Tree changes affect only planted native vegetation, which requires no biodiversity offsets. No changes to the approved BDAR are required, and no additional offset obligations are imposed. All ecosystem and species credits have been retired. The Conservation Programs, Heritage and Regulation (CPHR) Group has confirmed that the modification is unlikely to increase the impact on biodiversity values. In accordance with Section 7.17 of the Biodiversity Conservation Act 2016, a new or updated BDAR is not required as the modification will not increase the impact on biodiversity values.

The proposed modification will not adversely impact biodiversity outcomes. All originally approved biodiversity offset obligations remain satisfied.

6.8 TRAFFIC AND TRANSPORT

An updated Traffic and Transport Assessment has been prepared by Impact Traffic Engineering on behalf of AW Edwards to support this modification. The assessment addresses SEARs Key Issue 6 (Traffic, Transport and Accessibility) and assesses the traffic impacts of the modified scheme against the surrounding road network. A summary of the key traffic parameters is provided in the table below.

TABLE 16: SUMMARY OF TRAFFIC AND TRANSPORT PARAMETERS	
Parameter	Modified Proposal
Operating hours	24 hours / 7 days per week
Total staff	Up to 276 (split evenly across 3 shifts)
Staff on site at any one time	80–85
Shift times	8:00am–4:00pm; 4:00pm–12:00am; 12:00am–8:00am
Peak staff vehicle movements (per peak hour)	69 inbound / 69 outbound
Heavy rigid vehicle movements	Up to 12 per day (2 in / 2 out per peak period)
Articulated (20 m) vehicle movements	<1 per week (plant replacement/maintenance only)
Car parking spaces provided	149 (including 4 DDA compliant)
Peak car parking demand (shift changeover)	130–138
Bicycle spaces	10 (5 double-sided racks)
Site access	Separate entry and exit crossovers to Huntingwood Drive, plus emergency access at the north-western corner

Primary vehicle movements are generated by staff shift changes, with staff mode share assumed at 80.6% (driver), informed by ABS Journey to Work data adjusted for the site's location in Huntingwood. Operational delivery traffic is limited to up to 12 heavy rigid vehicles per day, with articulated vehicle movements limited to plant replacement/maintenance activities (less than one movement per week). All vehicles enter and exit the site in a forward direction.

Intersection performance has been modelled using SIDRA Intersection 9 for the following four critical intersections under 2024 (immediate post-development) and 2034 (10-year future) design year scenarios, comparing 'without development' and 'with development' conditions:

- Huntingwood Drive / Brabham Drive
- Great Western Highway / Huntingwood Drive
- Great Western Highway / Brabham Drive
- Great Western Highway / Reservoir Road

The analysis concludes that the modified development will have a negligible impact on intersection performance and road network capacity, with the 'with development' scenario producing very little



difference in degrees of saturation, queue lengths or average delays compared with the 'without development' scenario in both design years.

The provision of 149 car parking spaces (inclusive of 4 DDA compliant spaces) is sufficient to accommodate the estimated peak parking demand of 130–138 spaces during shift changeover periods when arriving staff overlap with departing staff. The provision complies with Blacktown DCP 2015 and satisfies the parking objectives of Part A, Section 6 of the DCP. Ten bicycle parking spaces are provided adjacent to the main office entry point in accordance with AS2890.3:2015. Vehicle access, internal circulation, loading dock provision and swept path manoeuvring have been reviewed and comply with Australian Standards (AS2890.1:2004, AS2890.2:2018, AS2890.3:2015 and AS2890.6:2009) and the relevant provisions of the Blacktown DCP 2015.

The Traffic and Transport Assessment confirms that the modified development is not expected to adversely impact the surrounding road network, intersection performance, or parking provision. The modification represents an appropriate response to the consolidated data centre layout without generating additional traffic impacts beyond those assessed for the approved development. Refer to **Appendix B6** for the full report.

6.9 HAZARDS AND RISK

A Hazards and Risk Assessment Report has been prepared by SLR Consulting on behalf of AW Edwards to assess the potential hazards and risks associated with the proposed modification, including storage and handling of diesel fuel and lithium-ion batteries.

The development does not classify as a hazardous or offensive industry under State Environmental Planning Policy (Resilience and Hazards) 2021. However, the site will store diesel fuel (classified as C1 Combustible Liquid) and lithium-ion batteries (Class 9 Miscellaneous dangerous substances) in quantities that exceed manifest thresholds and require regulatory notification. No Dangerous Goods (as classified under UN classification) will be used or stored at the facility.

Diesel fuel storage totals 3,755 kL (3,318 tonnes) across multiple storage locations including bulk tanks (110 kL bulk tanks for Shell A; 96 kL bulk tanks for Shells B, C, D, E), generator day tanks, and belly tanks. The final number and size of bulk tanks will be subject to the final design; however total diesel storage will not exceed 4,048 kL. All diesel storage will conform to AS 1940:2017 The Storing and Handling of Flammable and Combustible Liquids, with fire-rated, bunded, above-ground storage rooms. No flammable liquids will be stored with the diesel.

Lithium-ion batteries totalling 893,000 kg will be contained in 316 Power Train Units (PTUs) comprising 3,160 battery cabinets, distributed across shells A through E. Each PTU comprises 10 battery cabinets, with two types of PTU - an IT PTU and a Mechanical (Mech) PTU. Battery cabinets are anticipated to be the Galaxy Li-ion Battery Cabinet IEC-LIBSESWG17IEC. Batteries will be installed and maintained in accordance with manufacturers' requirements and relevant regulatory standards.

Diesel fuel storage exceeding 2,000 tonnes requires an Environment Protection Licence (EPL) from the NSW Environmental Protection Authority (EPA) under the Protection of the Environment Operations Act 1997. Safework NSW notification is required for diesel storage exceeding manifest quantities (100,000 kg or litres), with emergency management plans to be lodged with Fire and Rescue NSW.

Lithium-ion battery quantities exceeding 25,000 kg under NSW Work Health and Safety Regulation 2025 (Reg 361) require an Emergency Plan for submission to Fire & Rescue NSW. Further regulatory advice will be sought from Fire & Rescue NSW regarding specific compliance requirements.

A Preliminary Hazard Analysis identified potential incident scenarios including diesel release (tank failure, pipe leak, maintenance operations, bulk delivery), fire scenarios (lithium battery storage, generator, electrical systems), and external fire impact. For each scenario, control measures, likelihood, consequence, and residual risk were assessed.

Residual risks after implementation of controls were determined to be Negligible to ALARP (As Low as Reasonably Practicable). All identified risks are managed through technical and management safeguards that are standard industry practice and readily implemented as part of plant safety engineering, including periodic vessel inspection, maintenance protocols, bunding, fire control systems, and emergency evacuation plans.

With suitable engineering and design controls in place, the proposed development would not be considered an offensive or hazardous development. The technical and management safeguards required for both diesel and lithium-ion batteries are self-evident and readily implemented as part of plant safety engineering. Residual risks are acceptable and managed within the site boundary.

6.10 VISUAL IMPACT ASSESSMENT

A Visual Impact Addendum Report has been prepared by Geoscapes to assess the visual effects of the proposed modification against the approved SSD-41589232 scheme. The assessment reassesses the viewpoints used in the original Visual Impact Assessment to provide a direct and consistent comparison of visual outcomes.

The assessment concludes that the proposed modification does not result in any material increase in adverse visual impacts when compared against the approved scheme. The building height is maintained at the approved 49.75 m, consistent with the approved building envelope, with no adverse visual or amenity impacts. Water tanks within the Southern Tank Yard are reduced from 8 to 5 (per the previous MOD), with 3 tanks relocated to the centre of the site, with tank heights remaining consistent with the approved SSD and no exceedance of the approved RL.

The consolidation of data shells from 10 to 5 and reduction in GFA from 122,546 m² to 64,346 m² reduces the perceived bulk of the development. Supplementary landscaping along the southern boundary has been retained and enhanced for screening of water tanks and infrastructure from the M4 corridor. These improvements are most apparent from viewpoints situated at greater distances to the north and from easterly and westerly approaches.

The proposed modification introduces changes to the built form through consolidation of data shells and the relocation of mechanical plant (Hybrid Dry Coolers) to ground-level positions along the eastern, southern and western boundaries. However, the building height and key visual parameters remain consistent with the approved SSD. Supplementary landscaping along the southern boundary provides enhanced screening. No significant adverse visual impacts are generated, and the modification scheme is considered acceptable in visual terms.

6.11 CONDITIONS TO BE REMOVED

The desired development outcome as outlined above requires the following modifications to the Notice of Decision for SSD-41589232.

The proposed amendments are demonstrated in red, with deletions as a ~~striketrough~~ and additions as underlined.



MODIFICATION REPORT

51 Huntingwood Drive Data Centre

Address (Lot 1 DP 857249)

SSD-41589232

REGISTER OF PROJECT PLANS				
Project No.	Drawing No.	Revision	Date	Title
Architectural Drawings prepared by Greenbox Architecture Pty Ltd				
210043	DA010	~~K~~ P	~~31/08/2023~~ 17/04/2026	OVERALL SITE PLAN
210043	DA011	~~J~~ M	~~31/08/2023~~ 17/04/2026	OVERALL LEVEL 1 PLAN (LOWER GROUND)
210043	DA012	~~J~~ M	~~31/08/2023~~ 17/04/2026	OVERALL LEVEL 2 PLAN (UPPER GROUND)
210043	DA013	~~I~~ L	~~31/08/2023~~ 17/04/2026	OVERALL LEVEL 3 PLAN
210043	DA014	~~H~~ K	~~20/04/2023~~ 17/04/2026	OVERALL LEVEL 4 PLAN
210043	DA015	~~H~~ K	~~20/04/2023~~ 17/04/2026	OVERALL LEVEL 5 PLAN
210043	DA016	~~H~~ K	~~20/04/2023~~ 17/04/2026	OVERALL LEVEL 6 PLAN (LOWER ROOF)
210043	DA017	~~H~~ K	~~20/04/2023~~ 17/04/2026	OVERALL LEVEL 7 PLAN (UPPER ROOF)
210043	DA020	~~J~~ M	~~31/08/2023~~ 17/04/2026	SITE ELEVATION
210043	DA030	~~I~~ L	~~31/08/2023~~ 17/04/2026	SITE SECTION
210043	DA031	~~I~~ L	~~31/08/2023~~ 17/04/2026	SITE SECTION
~~210043~~	~~DA040~~	~~I~~	~~17/04/2026~~	~~Site Axonometric View~~
210043	DA101	~~E~~ F	~~11/07/2023~~ 17/04/2026	PART A – L1 + MEZZANINE
210043	DA102	~~E~~ F	~~11/07/2023~~ 17/04/2026	~~PART A – L2 – L5 (TYPICAL)~~ ~~PART A – L2 – L5 (TYPICAL)~~
~~210043~~	~~DA103~~	~~E~~	~~17/04/2026~~	~~Part A – L3~~
~~210043~~	~~DA104~~	~~A~~	~~17/04/2026~~	~~PART A – L4~~
~~210043~~	~~DA105~~	~~A~~	~~17/04/2026~~	~~PART A – L5~~
210043	~~DA103~~ DA106	~~E~~ A	~~11/07/2023~~ 17/04/2026	PART A – L6 ROOF
~~210043~~	~~DA107~~	~~A~~	~~17/04/2026~~	~~PART A – L7 ROOF~~
210043	DA111	~~E~~ G	~~11/07/2023~~ 17/04/2026	PART B – L2
210043	~~DA112~~ DA113	~~F~~ H	~~20/04/2023~~ 17/04/2026	~~PART B – L3 – L6 (TYPICAL)~~ ~~PART B – L3 – L5 (TYPICAL)~~
210043	DA113	~~F~~ G	~~11/07/2023~~ 17/04/2026	PART B – L7 ROOF
210043	DA121	~~E~~ G	~~20/04/2023~~ 17/04/2026	PART C – L2 – L6 (TYPICAL)
~~210043~~	~~DA122~~	~~G~~	~~20/04/2023~~	~~PART C – L7 ROOF~~
210043	DA201	~~I~~ K	~~31/08/2023~~ 17/04/2026	PART A – BUILDING ELEVATION



MODIFICATION REPORT

51 Huntingwood Drive Data Centre
Address (Lot 1 DP 857249)

SSD-41589232

<u>210043</u>	<u>DA202</u>	<u>I</u>	<u>17/04/2026</u>	<u>PART A – BUILDING ELEVATION</u>
210043	DA203	~~D~~ <u>E</u>	~~20/04/2023~~ <u>17/04/2026</u>	PART A – BUILDING SECTION
210043	DA211	~~I~~ <u>J</u>	~~20/04/2023~~ <u>17/04/2026</u>	~~PART B & C – BUILDING ELEVATION~~ <u>PART B – BUILDING ELEVATION</u>
210043	DA212	~~H~~ <u>J</u>	~~20/04/2023~~ <u>17/04/2026</u>	~~PART B & C – BUILDING ELEVATION~~ <u>PART B – BUILDING ELEVATION</u>
210043	DA213	~~D~~ <u>E</u>	~~20/04/2023~~ <u>17/04/2026</u>	~~PART B & C – BUILDING SECTION~~ <u>PART B – BUILDING ELEVATION</u>
~~210043~~	~~DA300~~	~~D~~	~~20/04/2023~~	~~SECURITY GUARD KIOSK DETAILS~~
~~210043~~	~~DA310~~	~~D~~	~~20/04/2023~~	~~SUBSTATION 1 DETAILS~~
<u>210043</u>	<u>DA311</u>	<u>E</u>	<u>17/04/2026</u>	<u>SUBSTATION 1 DETAILS</u>
~~210043~~	~~DA311~~	~~D~~	~~20/04/2023~~	~~SUBSTATION 2 DETAILS~~
210043	DA320	~~D~~ <u>E</u>	~~20/04/23~~ <u>14/11/2025</u>	PUMP ROOM DETAILS
210043	DA321	~~D~~ <u>E</u>	~~20/04/23~~ <u>17/04/2026</u>	PUMP ROOM II DETAILS
<u>210043</u>	<u>DA322</u>	<u>B</u>	<u>14/11/2025</u>	<u>FIRE PUMP ROOM DETAILS</u>
210043	DA330	D	20/04/23	ELECTRICAL CONTROL ROOM
210043	DA400	F	11/05/23	MATERIAL FINISHES SCHEDULE
210043	DA500	~~D~~ <u>E</u>	~~11/07/22~~ <u>14/11/2025</u>	DEMOLITION PLAN
<u>210043</u>	<u>DA900</u>	<u>H</u>	<u>17/04/2026</u>	<u>GBA CALCULATION PLAN</u>
210043	DA920	~~D~~ <u>E</u>	~~04/07/23~~ <u>17/04/2026</u>	PHASING DIAGRAM

6.12 MANAGEMENT AND MITIGATION MEASURES

The Applicant plans to undertake the construction and operation of the modified data centre in accordance with approved management and mitigation measures from SSD-41589232, with the following changes to reflect the proposed modifications:

The Updated Air Quality Impact Assessment confirms full compliance with NSW EPA contemporary impact assessment criteria across the modelling domain. The approved 316 emergency generators are retained, consistent with the approved SSD. The generator testing regime comprises three (3) generators tested simultaneously (one per generator bank) at 100% load from 07:00 to 18:00 (Monday to Friday), consistent with MCoA Condition B1 and the approved SSD testing arrangement. Generators will not operate for more than 200 hours per year, consistent with the POEO (Clean Air) Regulation 2022 Cl. 73 exemption for emergency standby plant. An operational protocol may be applied to restrict maintenance testing during periods of elevated background NO₂ concentrations, if required.

The Updated Acoustic Memorandum confirms full compliance with the approved SSD consent criteria (62/60/58 dBA) and the Blacktown DCP 2015 and NSW NPfl noise criteria at all receivers. The acoustic performance requirements, treatments and management controls established under the original SSDA Acoustic Assessment Report remain suitable, subject to the installation of an acoustic louvre to the eastern side of the Shell A rooftop. Acoustic performance requirements for the Hybrid Dry Coolers (HDCs) and generators are confirmed in specifications and are to be assessed at the detailed design stage.



The Updated landscape documentation reflects the modified planting strategy. Landscape area reduces from 12,021 m² to 11,270 m², with marginally higher planting densities at some locations to ensure no net loss of revegetation. Total trees post-planting are maintained at 607, equivalent to the approved DA. Supplementary landscaping along the southern boundary has been retained and enhanced for screening of water tanks and infrastructure from the M4 corridor. The Biodiversity Verification Statement confirms no additional biodiversity offset obligations are triggered, and that, in accordance with Section 7.17 of the Biodiversity Conservation Act 2016, a new or updated BDAR is not required.

The Updated Infrastructure Requirements Report confirms that existing electrical, water, stormwater, sewer, and telecommunications systems are adequate for the modified development, subject to the proposed 132 kV electrical connection upgrades to Endeavour Energy feeders 93Z and 9J1, and the Sydney Water mains amplification to be confirmed via the Section 73 Feasibility Study. Ground-level fuel tank compliance with AS1940:2017 (fire-rated, bunded storage) is confirmed, with total diesel storage maintained at 4,048 kL.

An Updated Hazards and Risk Assessment Report confirms residual risks associated with diesel storage and lithium-ion batteries are assessed as Negligible to ALARP, with all hazard controls reflecting standard industry practice. An Emergency Plan will be prepared and submitted to Fire & Rescue NSW for the lithium-ion battery storage, in accordance with NSW Work Health and Safety Regulation 2025 (Reg 361). An operational Waste Management Plan addressing lithium-ion battery storage and disposal will be prepared in accordance with conditions of consent.

Car parking is maintained at the approved 149 spaces, consistent with the approved SSD. Updated Traffic Impact Assessment confirms negligible impact on the surrounding road network, with operational vehicle movements comprising 69 inbound and 69 outbound staff vehicle movements per peak hour, plus up to 12 heavy rigid vehicle movements per day.

The Updated Integrated Water Cycle Management Plan confirms that the modified site design achieves all Blacktown City Council WSUD pollutant reduction targets, with no material difference in stormwater quality outcomes from the approved SSD, consistent with Condition B39 of the Development Consent.

All other management and mitigation measures from the approved SSD-41589232 consent remain applicable and unchanged for construction and operational phases.

PART 7 JUSTIFICATION OF THE PROJECT

7.1 JUSTIFICATION

The proposed modification is justified on environmental, social, and economic grounds. The modification consolidates and optimises the approved data centre through contemporary technology, evolving client demand, and infrastructure advancement, delivering improved operational efficiency and environmental performance whilst maintaining key parameters consistent with the approved SSD - including building height (49.75 m), emergency generators (316 units), car parking (149 spaces), diesel storage (4,048 kL), CIV (\$1,074,990,484), and employment generation (1,333 construction and up to 276 operational jobs).

The previous modification application was withdrawn due to evolving client demand and rapid advances in data centre technology necessitating a revised design approach. The current modification addresses issues raised during the previous assessment process by closely aligning key parameters with the approved SSD baseline wherever possible. The modification remains compatible with the locality and the industrial context of the Huntingwood precinct.

This Modification Report is submitted on the following basis.

7.1.1 Supports State, Regional and Local Planning Objectives

The proposed modification aligns with the objectives, provisions, and vision contained within A Metropolis of Three Cities - Greater Sydney Region Plan and the Central City District Plan. The modification maintains the Site's role as critical industrial employment land within the Huntingwood Industrial Precinct, supporting the retention and efficient utilisation of appropriately zoned land for knowledge-intensive data centre operations.

Data centre infrastructure represents strategic investment in Western Sydney's digital economy. The modification delivers improved operational efficiency and contemporary industry standards, positioning the facility to service growing data storage demand in Greater Sydney. The proposal maintains 1,333 construction jobs and up to 276 operational jobs within proximity to Blacktown CBD, supporting ongoing employment in knowledge-intensive sectors and contributing to local economic resilience.

The consolidation of the approved data centre through higher-density rack configurations reflects contemporary technological advancement in the sector and evolving client demand. By delivering IT processing capacity across a reduced physical footprint (GFA reduced from 122,546 m² to 64,346 m²), the modification optimises use of industrial-zoned land whilst improving operational standards and environmental performance. Key parameters - including building height (49.75 m), emergency generators (316 units), car parking (149 spaces), diesel storage (4,048 kL), and CIV (\$1,074,990,484) - remain consistent with the approved SSD, reinforcing that the modification represents an optimisation of the approved development rather than a departure from it. This approach aligns with State and Regional planning priorities to retain and efficiently utilise industrial land for employment-generating uses in proximity to established transport and employment corridors.

The proposed modification retains the development as a Data Storage Premises operating within the E4 zone. The modification represents an operational efficiency response to technological advancement rather than a fundamental change to development type or character. The consolidation from 10 to 5 data shells delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E, relocation of mechanical plant (Hybrid Dry Coolers) to ground-level positions along the eastern, southern and western boundaries, and reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout all represent internal optimisation of the approved development without altering its core function or purpose.



7.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed modification retains and maintains the approved data centre as a permissible use within the E4 zone. The modification consolidates and optimises the approved development through contemporary technological advancement and evolving client demand, delivering improved operational efficiency without altering the fundamental character or purpose of the data centre use.

The Site is appropriately located within the Huntingwood Industrial Precinct, surrounded by similar industrial and commercial developments. The modification is highly compatible with existing land uses and the industrial context of the locality. The consolidation of data shells from 10 to 5 through higher-density rack configurations delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E, relocation of mechanical plant to ground-level positions along the eastern, southern and western boundaries, reconfiguration of supporting gantry systems and chiller farms represent operational optimisation aligned with contemporary data centre industry practice. Key parameters - including building height (49.75 m), emergency generators (316 units), car parking (149 spaces), diesel storage (4,048 kL), and CIV (\$1,074,990,484) - remain consistent with the approved SSD, demonstrating that the modification addresses issues raised during the previous assessment process by closely aligning with the approved SSD baseline.

The modification responds to and supports the strategic goals and objectives of A Metropolis of Three Cities – Greater Sydney Region Plan and the Central City District Plan, which envisage employment-generating land uses at this location. The proposal maintains 1,333 construction jobs and 276 operational jobs and continues to support knowledge-intensive employment in Western Sydney's digital infrastructure sector, contributing to broader regional economic objectives and the retention of strategic industrial employment land.

7.1.3 Minimises Environmental Impacts

Specialist consultants have assessed the potential impacts of the proposed modifications, determining that the modification results in minimal environmental impact with equivalent or improved outcomes across key assessment areas. The commissioned reports have collectively concluded that no significant adverse risk to the locality would result from the proposed modification.

The modification delivers improved environmental performance in several key areas. Air quality scope remains consistent with the approved SSD, with emergency generators maintained at 316 units. Updated modelling using the refined Janssen NO_x-to-NO₂ conversion methodology accepted by the NSW EPA during the previous assessment process demonstrates full compliance with contemporary impact assessment criteria across the modelling domain. Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA), with approved noise conditions retained - no new sources or operational changes warrant departure from the approved consent. Updated acoustic modelling demonstrates full compliance at all receivers, subject to installation of an acoustic louvre to the eastern side of the Shell A rooftop.

The significant reduction in Gross Floor Area (from 122,546 m² to 64,346 m²) results in reduced built form footprint. The building height is maintained at the approved 49.75 m, consistent with the approved building envelope, with no adverse visual or amenity impacts. Southern Tank Yard water tanks are reduced from 8 to 5, with tank heights consistent with the approved SSD and no exceedance of the approved RL. Landscaping area reduces from 12,021 m² to 11,270 m² with supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor. The total number of trees post-planting is maintained at 607 (123 retained plus 484 proposed), equivalent to the approved DA, with no adverse biodiversity impact confirmed by the Biodiversity Verification Statement. In accordance with Section 7.17 of the Biodiversity Conservation Act 2016, a new or updated BDAR is not required as the modification will not increase the impact on biodiversity values.



Traffic and transport impacts remain consistent with the approved development. Updated Traffic Impact Assessment confirms negligible impact on intersection performance and road network capacity, with operational vehicle movements comprising 69 inbound and 69 outbound staff vehicle movements per peak hour, plus up to 12 heavy rigid vehicle movements per day. Car parking is maintained at 149 spaces. Infrastructure systems approved to service the original data centre development can adequately service the modified works. An updated Infrastructure Requirements Report confirms serviceability for the proposed layout and equipment configuration.

Hazards and risk assessment confirm residual risks associated with diesel storage (4,048 kL) and lithium-ion batteries (893,000 kg across 316 Power Train Units) remain Negligible to ALARP with implementation of control measures. All diesel storage complies with AS 1940:2017.

All identified environmental impacts are managed and mitigated through updated management plans, compliance with relevant Australian Standards (AS 1940, BCA 2022), and ongoing operational protocols. The modification represents an overall reduction and rationalisation of the approved development with improved or equivalent environmental outcomes across all key impact categories.

7.1.4 Creates Compatibility with Surrounding Development

The proposed modification maintains compatibility with existing land uses on adjacent lands within the Huntingwood Industrial Precinct. Surrounding land uses comprise commercial and industrial developments to the north, east, and west, with the Western Motorway and Sydney Motorsport Park to the south. All adjacent uses operate within similar industrial contexts characterised by employment-generating activities and infrastructure operations.

The modification does not alter the fundamental compatibility of the approved data centre with surrounding industrial land uses. The consolidation of data shells from 10 to 5, relocation of mechanical plant to ground-level positions along the eastern, southern and western boundaries, and introduction of internal infrastructure optimisation occur entirely within the approved site boundary. The modification maintains the same 24 - hour operational framework, operational vehicle movements (69 inbound and 69 outbound staff per peak hour, plus up to 12 heavy rigid vehicle movements per day), and employment outcomes (1,333 construction and up to 276 operational jobs) as the approved development. Key parameters - including building height (49.75 m), emergency generators (316 units), car parking (149 spaces), and diesel storage (4,048 kL) - remain consistent with the approved SSD.

Specialist assessments undertaken as part of this modification application (traffic, noise, air quality, biodiversity, hazards and risk, and infrastructure) conclude that the proposed modifications will not generate significant cumulative environmental impacts when considered in conjunction with existing and approved developments in the locality. Air quality scope remains consistent with the approved SSD, with updated modelling using refined methodology demonstrating full compliance with contemporary impact assessment criteria. Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA), with approved noise conditions retained. The Biodiversity Verification Statement confirms no increased impact on biodiversity values, and the hazards and risk assessment confirms residual risks remain Negligible to ALARP.

The modification represents an orderly and appropriate response to the industrial zoning and strategic planning objectives for this location, with no adverse cumulative impacts arising from the proposed scope of works.

7.1.5 Delivers Ecologically Sustainable Development

The principles of ESD as outlined in section 193 of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:



7.1.5.1 Precautionary Principle

After careful assessment by both the project team and expert consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

7.1.5.2 Inter-generational Equity

The project team and specialist consultants have examined the overall effects of the proposed modification on both the natural environment and the existing built environment within the vicinity of the subject site.

This detailed assessment has concluded that the proposed modification will not result in unreasonable use of resources, adverse affectation of environmental processes, or prevention of the use of land for future generations. The modification optimises the approved development through contemporary data centre technology and evolving client demand, delivering IT processing capacity within a significantly reduced physical footprint (Gross Floor Area reduced from 122,546 m² to 64,346 m²). Key parameters - including building height (49.75 m), emergency generators (316 units), car parking (149 spaces), diesel storage (4,048 kL), and CIV (\$1,074,990,484) - remain consistent with the approved SSD. This efficiency response minimises resource consumption and environmental impact whilst maintaining employment generation.

The modification delivers equivalent or improved environmental outcomes across all key assessment areas. Air quality scope remains consistent with the approved SSD, with updated modelling demonstrating full compliance with contemporary impact assessment criteria. Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA). The Biodiversity Verification Statement confirms no increased impact on biodiversity values, with the total number of trees post-planting maintained at 607, equivalent to the approved DA. Hazards and risk assessment confirms residual risks associated with diesel storage and lithium-ion batteries remain Negligible to ALARP. The consolidation and optimisation of the data centre represent responsible stewardship of the industrial-zoned land, ensuring its continued and efficient utilisation for employment-generating knowledge-intensive uses aligned with Greater Sydney's digital infrastructure requirements.

The modified development will continue to contribute to the regional economy through sustained investment in data centre infrastructure and maintenance of 1,333 construction jobs and up to 276 operational jobs within proximity to Blacktown CBD. The modification thereby maintains inter-generational equity by ensuring the Site's ongoing utility for strategic employment land whilst improving operational efficiency and environmental performance for current and future use.

7.1.5.3 Conservation of Biological Diversity and Ecological Integrity

The proposed modification will not adversely impact biological diversity or ecological integrity of the site or surrounding locality. A Biodiversity Verification Statement prepared by Travers bushfire & ecology confirms that the minimal increase in tree removal (+6 additional trees to the approved 2,131) affects only planted native vegetation areas, not remnant Cumberland Plain Woodland.

The modification does not trigger additional biodiversity offset requirements, with all originally approved biodiversity offset obligations remaining satisfied. The updated landscaping strategy incorporates native and endemic species suited to Cumberland Plain Woodland communities, supporting local biodiversity outcomes whilst providing visual and thermal amenity benefits.

The Site is cleared industrial land with no native vegetation of high conservation value requiring no-development zones. No items of Aboriginal or non-Aboriginal heritage significance are identified on the Site, and no waterways or water bodies are present. The modification does not introduce constraints to ecological connectivity or adversely affect ecological processes within the locality.



The consolidation of the data centre footprint and reduction in overall built form (Gross Floor Area reduced from 122,546 m² to 64,346 m²) represents efficient land utilisation, minimising environmental disturbance whilst maintaining strategic industrial employment use. The modification thereby supports conservation of biological diversity and ecological integrity through optimised land use practices.

7.1.5.4 Improved Valuation, Pricing and Incentive Mechanisms

The proposed modification delivers substantial operational efficiencies and economic benefits for the end user through consolidation and optimisation of the approved data centre design. The adoption of higher-density rack configurations enables IT processing capacity to be delivered across a reduced number of data shells (5 instead of 10), resulting in material cost savings through reduced built form (GFA reduced from 122,546 m² to 64,346 m²), operational complexity, and infrastructure requirements. The CIV is maintained at \$1,074,990,484, with no change to the approved capital investment.

Relocation of mechanical plant to ground level along the eastern, southern and western boundaries improves maintenance accessibility and operational coordination, reducing downtime and associated operational costs. Reconfiguration of supporting gantry systems and chiller farms supports improved energy efficiency and infrastructure utilisation aligned with the consolidated layout. These infrastructure improvements position the facility to deliver competitive operational performance aligned with contemporary industry standards.

The consolidation and optimisation of the Site represent efficient use of appropriately zoned industrial land, maximising economic return on the capital investment whilst minimising environmental footprint. The modification delivers improved facility economics through contemporary technology adoption and operational best practice, maintaining 1,333 construction jobs and up to 276 operational jobs and creating incentives for continued investment in data centre infrastructure within Greater Sydney's strategic industrial precincts.

The modification thereby supports improved valuation, pricing, and incentive mechanisms by demonstrating responsive design adaptation to contemporary market requirements, evolving client demand, and technological advancement, positioning the facility for long-term competitiveness and operational viability in the growing data storage sector.

7.1.5.5 Environmental Management

The proposed modification implements comprehensive management measures that avoid, minimise, and mitigate potential air quality, noise, waste, and pollution impacts through design optimisation, infrastructure positioning, and operational controls.

Air quality scope remains consistent with the approved SSD, with emergency generators maintained at 316 units. Updated modelling using the refined Janssen NO_x-to-NO₂ conversion methodology demonstrates full compliance with contemporary impact assessment criteria across the modelling domain. Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA), with approved noise conditions retained - no new sources or operational changes warrant departure from the approved consent.

Updated Infrastructure Requirements Report confirms that approved electrical systems, water supply, stormwater, and sewer systems can adequately service the modified development. An updated Integrated Water Cycle Management Plan has been provided, with no material difference in stormwater quality outcomes from the approved SSD. Ground-level fuel tank installations comply with AS 1940:2017 fire safety standards with fire-rated, bunded storage. Total diesel storage is maintained at 4,048 kL. Hazards and risk assessment confirms residual risks associated with diesel storage and lithium-ion batteries (893,000 kg across 316 Power Train Units) remain Negligible to ALARP. Construction Traffic Management Plan details predicted construction vehicle movements,



routes, and mitigation measures, with earthworks staged across two construction phases to minimise concurrent disturbance.

Operational protocols include routine maintenance scheduling, waste management procedures, and emergency response protocols consistent with the approved development. These measures demonstrate that the modification implements best practice environmental management throughout both construction and operational phases, delivering improved or equivalent environmental outcomes compared to the approved development.

7.2 CONCLUSION

Based on the detailed assessment undertaken in this Modification Report and specialist studies supporting the proposed modifications, the following conclusions are reached:

The proposed modification consolidates and optimises the approved data centre through contemporary technology, evolving client demand, and strategic infrastructure rationalisation, delivering material improvements in operational efficiency and environmental performance. The previous modification application was withdrawn due to evolving client demand and rapid advances in data centre technology necessitating a revised design approach. The current modification addresses issues raised during the previous assessment process by closely aligning key parameters with the approved SSD baseline wherever possible. The modification maintains the fundamental character and purpose of the approved development as a data storage premises located at Lot 1 DP 857249, with unchanged 24-hour operational framework and consistent employment generation at 1,333 construction jobs and up to 276 operational jobs.

The modification satisfies the legislative requirements for approval under Section 4.55(1A) of the Environmental Planning and Assessment Act 1979. The modification results in overall reduction and rationalisation of the approved data centre with equivalent or improved environmental outcomes across all key impact categories, including air quality, acoustics, traffic generation, parking provision, tree retention, and visual impact. Key parameters - including building height (49.75 m), emergency generators (316 units), car parking (149 spaces), diesel storage (4,048 kL), and CIV (\$1,074,990,484) - remain consistent with the approved SSD. Landscaping area reduces from 12,021 m² to 11,270 m² with supplementary landscaping along the southern boundary retained and enhanced for screening. The total number of trees post-planting is maintained at 607, equivalent to the approved DA, with no adverse biodiversity impact confirmed by the Biodiversity Verification Statement. The proposed changes do not constitute a radical transformation of the approved development and remain substantially the same development as originally approved.

The Site is appropriately located within the Huntingwood Industrial Precinct and is compatible with surrounding industrial land uses. No heritage, flood, contamination, or other environmental constraints apply to the Site. The consolidation of data shells from 10 to 5 delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E, relocation of mechanical plant to ground-level positions along the eastern, southern and western boundaries, and reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout reflect industry best practice and technological advancement rather than a fundamental change to development type.

Specialist assessments confirm that the modification results in minimal environmental impact and delivers equivalent or improved environmental outcomes. Air quality scope remains consistent with the approved SSD, with updated modelling demonstrating full compliance with contemporary impact assessment criteria. Acoustic impacts remain consistent with approved SSD consent criteria (62/60/58 dBA). Traffic impacts remain negligible, and biodiversity outcomes are preserved with no additional offset requirements. Hazards and risk assessment confirm residual risks associated with diesel storage and lithium-ion batteries remain Negligible to ALARP. In accordance with Section 7.17 of the Biodiversity Conservation Act 2016, a new or updated BDAR is not required as the modification will not increase the impact on biodiversity values.



MODIFICATION REPORT

51 Huntingwood Drive Data Centre

Address (Lot 1 DP 857249)

SSD-41589232

Given the above comprehensive assessment, the proposed modification is considered orderly and appropriate development that satisfies State, Regional, and Local planning objectives. The modification supports Greater Sydney's data storage demand through efficient utilisation of appropriately zoned industrial land whilst delivering improved operational standards and environmental performance. On this basis, the proposed modification is recommended for approval subject to relevant and reasonable conditions.



APPENDIX A
UPDATED
PROJECT
DESCRIPTION

PROJECT DESCRIPTION

51 Huntingwood Drive Data Centre
Address (Lot 1 DP 857249)

SSD-41589232**PROJECT DESCRIPTION – SSD-41589232**

Project:	State Significant Development Application (SSD-41589232) For 51 Huntingwood Drive Data Centre
Applicant:	AW Edwards Pty Ltd
Site:	51 Huntingwood Drive, Huntingwood, NSW 2160 Lot 1 DP 857249

The proposed development consists of a modification to the approved data centre to consolidate and optimise the facility through contemporary technology, evolving client demand, and infrastructure rationalisation. The previous modification application (MOD 1) was withdrawn due to evolving client demand and rapid advances in data centre technology necessitating a revised design approach.

The proposal is summarised below:

TABLE 17: SUMMARY OF PROPOSED MODIFICATION	
Element	Proposed Modification
Data Shells	Consolidation from 10 to 5 shells, delivering an overall IT load of approximately 72 MW across shells A, B, C, D, and E
Gantry Systems and Chiller Farms	Reconfiguration of supporting gantry systems and chiller farms to suit the consolidated layout; all generator flues minimum 41 m above ground level
Mechanical Plant	Hybrid Dry Coolers (HDCs) relocated to ground-level positions along the eastern, southern and western boundaries, with rooftop plant retained on Shell A. Total HDC numbers reduced from 172 to 144 to suit the consolidated five-shell layout.
Water Tanks (Southern Tank Yard)	Reduced from 8 to 5 (per the previous MOD 1), with 3 tanks relocated to the centre of the site to reduce visual bulk along the M4 corridor
Fuel Storage	Ground-level fuel tanks retained; fire-rated, bunded storage complying with AS 1940:2017. Total diesel storage maintained at 4,048 kL, consistent with the approved SSD
Emergency Generators	316 units maintained, consistent with the approved SSD; distributed across 5 shells (Shell A: 32, Shell B: 76, Shell C: 72, Shell D: 66, Shell E: 70)
Car Parking	149 spaces maintained, including 4 accessible spaces and 10 bicycle spaces
Gross Floor Area	Reduction from 122,546 m ² to 64,346 m ² (58,200 m ² reduction)
Building Height	Maintained at 49.75 m, consistent with the approved SSD
Landscape Area	11,270 m ² (12.5% of site area), reduced from 12,021 m ² approved. Supplementary landscaping along the southern boundary retained and enhanced for screening of water tanks and infrastructure from the M4 corridor
Tree Removal and Retention	Minimal increase in tree removal (+6 trees, for Sydney Water incoming valve arrangement). Total trees post-planting maintained at 607 (123 retained plus 484 proposed), equivalent to the approved DA. Plantings at marginally higher densities to ensure no net loss of proposed revegetation. Canopy coverage of 7,147 m ² (7.9% of site area)
Landscaping Species	Cumberland Plain Woodland trees and understorey (<i>Acacia parramattensis</i> , <i>Eucalyptus crebra</i> , <i>Eucalyptus tereticornis</i>); screening species (<i>Syzygium paniculatum</i> , <i>Elaeocarpus eumundi</i> , <i>Acacia implexa</i>); car park shade trees (<i>Eucalyptus scoparia</i> , <i>Eucalyptus maculata</i>); water-tolerant native grasses to OSD basin (<i>Ficinia nodosa</i> , <i>Juncus usitatus</i> , <i>Lomandra longifolia</i>)



PROJECT DESCRIPTION

51 Huntingwood Drive Data Centre

Address (Lot 1 DP 857249)

SSD-41589232**TABLE 17: SUMMARY OF PROPOSED MODIFICATION**

Element	Proposed Modification
Cumberland Plain Woodland Planting	0.26 ha dedicated to PCT 850 / Cumberland Plain Woodland planting
Earthworks	Net cut increased from 89,100 m ³ to 104,654 m ³ , reflecting inclusion of in-ground services and detailed excavation due to further progressed design. Net fill unchanged at 81,600 m ³
Operational Framework	24-hour operation, 7 days per week (unchanged)
Employment	1,333 construction jobs and up to 276 operational jobs maintained within proximity to Blacktown CBD
Construction Phasing	Phase 1 (Shell A); Phase 2 (Shells B, C, D, E, tech building, site infrastructure)

Consent is sought to develop the subject site for additional data storage, in accordance with the following plans.

REGISTER OF PROJECT PLANS

Drawing	Title	Rev.	Date
Civil drawings			
DAC101	Site Plan	C	17/04/2026
DAC201	Bulk Earthworks Plan	C	17/04/2026
DAC210	Erosion and Sediment Control Plan Sheet 1	C	17/04/2026
DAC211	Erosion and Sediment Control Plan Sheet 1	C	17/04/2026
DAC401	Drainage Layout – Sheet 1	C	17/04/2026
DAC402	Drainage Layout – Sheet 2	C	17/04/2026
DAC403	Drainage Layout – Sheet 3	C	17/04/2026
DAC405	Drainage Details – Sheet 1	C	17/04/2026
DAC410	OSD Tank A Details – Sheet 1	C	17/04/2026
DAC411	OSD Basin B Details – Sheet 2	C	17/04/2026
DAC450	OSD Catchment Plan	C	17/04/2026
DAC451	MUSIC Catchment Plan	C	17/04/2026
Tree works & landscaping drawings			
SSD-01	Landscape Masterplan	3	22/04/2026
SSD-02	Landscape Detail Plan 1	3	22/04/2026
SSD-03	Landscape Detail Plan 2	3	22/04/2026
SSD-04	Landscape Detail Plan 3	3	22/04/2026
SSD-05	Landscape Detail Plan 4	3	22/04/2026
SSD-06	Landscape Sections – Sheet 1	3	22/04/2026
SSD-06a	Landscape Sections – Sheet 2	3	22/04/2026
SSD-07	Specifications and Details	3	22/04/2026
SSD-08	Plant Schedule and Imagery	3	22/04/2026
SSD-09	Design Approach	3	22/04/2026
Architectural drawings			



PROJECT DESCRIPTION

51 Huntingwood Drive Data Centre

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SSD-41589232

DA010	Overall Site Plan	P	17/04/2026
DA011	Overall Level 1 Plan	M	17/04/2026
DA012	Overall Level 2 Plan	M	17/04/2026
DA013	Overall Level 3 Plan	L	17/04/2026
DA014	Overall Level 4 Plan	K	17/04/2026
DA015	Overall Level 5 Plan	K	17/04/2026
DA016	Overall Level 6 Plan	K	17/04/2026
DA016	Overall Level 7 Plan	K	17/04/2026
DA020	Site Elevation	M	17/04/2026
DA030	Site Section	L	17/04/2026
DA031	Site Section	L	17/04/2026
DA040	Site Axonometric View	I	17/04/2026
DA101	Part A – L1 + Mezzanine	F	17/04/2026
DA102	Part A – L2	F	17/04/2026
DA103	Part A – L3	F	17/04/2026
DA104	Part A – L4	A	17/04/2026
DA105	Part A – L5	A	17/04/2026
DA106	Part A – L6 Roof	A	17/04/2026
DA107	Part A – L7 Roof	A	17/04/2026
DA111	Part B – L2	G	17/04/2026
DA112	Part B – L3	H	17/04/2026
DA113	Part B - L4 - L6 (TYPICAL)	A	17/04/2026
DA114	Part B – L7 Roof	A	17/04/2026
DA201	Part A – Building Elevation	K	17/04/2026
DA202	Part A – Building Elevation	I	17/04/2026
DA203	Part A – Building Section	E	17/04/2026
DA211	Part B – Building Elevation	J	17/04/2026
DA212	Part B – Building Elevation	J	17/04/2026
DA213	Part B – Building Section	F	17/04/2026
DA311	Substation I Details	E	17/04/2026
DA321	Pump Room II Details	E	17/04/2026
DA900	GBA Calculation Plan	H	17/04/2026
DA920	Phasing Diagram	E	17/04/2026



APPENDIX B
SUPPORTING
DOCUMENTS



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