

Our ref: 43-61 Turner Road Data Centre (SSD-68013714)

Mr Christopher Serrano
Principal Environmental Consultant
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Level 5, 151 Clarence Street
Sydney NSW 2000

17 April 2025

Subject: 43-61 Turner Road Data Centre – Additional matters for submissions report

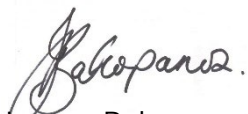
Dear Mr Serrano

I refer to the Department's previous correspondence dated 2 April 2025 which requests the provision of a submissions report in response to issues raised in public submissions and the advice provided by agencies.

In addition to responding to the submission and advice already received, you are required to submit additional information that addresses the matters listed in **Attachment 1** of this letter.

If you have any questions, please contact Shaun Williams, on (02) 8275 1345 or via email at shaun.williams@planning.nsw.gov.au.

Yours sincerely,



Joanna Bakopanos

A/Director

Industry Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Based on the Department's review of the information provided in the environmental impact statement (EIS), the Department considers further information is required to clarify matters and address inconsistencies within the documentation. In this regard, the following information is required to be provided as part of your submissions report:

Statutory Compliance

1. The Department notes the EIS and Statutory Compliance Table in Appendix C does not provide adequate consideration of the development standards and provisions of the State Environmental Planning Policy (Precincts - Western Parkland City) 2021 (Western Parkland City SEPP). The Department requests additional information be provided demonstrating compliance and consistency with the development standards and provisions of the Western Parkland City SEPP.

Data Centre Operations

2. Please provide an options analysis to demonstrate that the development's proposed cooling system utilises best-available technology, particularly with regard to its performance in minimising energy consumption and noise emissions.
3. Section 6.5.4 of the EIS suggests that the proposed data centre is designed with a high level of cooling redundancy, however provides limited information on the level of redundancy proposed or the reason/s for this requirement. In this regard, please provide additional details on the following:
 - the redundancy configuration for the cooling system (e.g. N, N+1, 2N+1, etc)
 - the number of units and their capacity, including any back-up units
 - the failover process and the duration for maintaining cooling during system failures or maintenance
 - the testing and maintenance procedures for the cooling system to ensure ongoing reliability.
4. The EIS does not appear to have provided a comprehensive options analysis/justification for the proposed back-up generator system. Please provide additional information to:
 - justify the proposed scale and capacity of the proposed back-up generator system, with regard to its associated redundancy and available/upcoming alternative energy storage technologies
 - confirm that the indicative back-up generator model used to inform the accompanying technical reports represents best available technology/practice, with regard to its associated noise/air quality impacts and the commercial availability of higher tier solutions.
5. Please provide further information regarding the proposed testing regime, including:
 - confirmation regarding whether ramp up/cool down times have been factored into the proposed test durations
 - confirmation whether commissioning tests would be undertaken for each back-up generator.

Note: Where necessary, information relating to data centre operations may be supplied under separate cover as 'commercial in confidence'.

Noise Impacts

6. The Department notes that unattended and attended noise monitoring undertaken within the Noise and Vibration Impact Assessment (NVIA) to establish the existing acoustic environment was undertaken in mid-2023. The Department requests additional justification to demonstrate the validity of the monitoring data or additional attended monitoring to verify the existing monitoring data utilised.
7. The Department requests further information to confirm that background noise monitoring for NCA2 has been adequately undertaken in accordance with Fact Sheets A and B of the EPA's Noise Policy for Industry (NPfI). In this regard, please provide additional details on the following:
 - a statement justifying the selection of each background noise monitoring site, including the procedures and criteria used to inform the selection of each location with reference to the definition of the "reasonably most-affected location(s)"
 - a description of the dominant and background noise sources observed, along with the procedure used to identify noise sources (e.g. audio capture or operator-attended measurements conducted during unattended data logging), as well as the range of measured sound pressure levels for each identified source
 - a statement confirming that short-term noise monitoring was conducted during periods when maximum noise impact would likely occur, having regard to the variability observed across the long-term noise monitoring site(s)
 - a record of any periods with affected data (due to adverse weather and extraneous noise), methods used to exclude invalid data, and a statement regarding the need for any re-monitoring.
8. The Department notes the NVIA does not provide the operational noise modelling results for the evening period. The NVIA should be updated to include operational noise modelling results for day, evening and night-time periods.

Air Quality

9. The Department notes that within Air Quality Technical Report (AQTR) in Appendix L multiple generators testing combinations were modelled under the realistic operations modelling scenario (Scenario 2). The Department requests the AQTR be updated to include additional or updated figures that clearly label and identify the location of different generator testing combinations modelled.
10. It is unclear whether the AQTR has adequately considered cumulative pollutant concentrations from surrounding industrial developments within Gregory Hills, Smeaton Grange or utilised similar emissions profiles such as the data centre development in Bluett Drive. The Department requests the AQTR to be updated to consider all potential cumulative impacts of surrounding developments and industrial operations.

Ecologically Sustainable Development

11. The Ecologically Sustainable Development (ESD) Report in Appendix J1 of the EIS should be updated to provide specific information on the development's urban heat effects. Further analysis is needed to substantiate the effectiveness of the proposed measures. The analysis must also address potential localised heat rejection impacts from rooftop cooling plant and equipment, and back-up generators on surrounding receivers.
12. The Department requests additional information be provided to detail and demonstrate the effectiveness of the proposed ESD measures to be implemented including the predicted energy and water savings of the development.

Traffic and Access

13. Additional Swept path analysis should be provided to demonstrate all site access points, including vehicle access off Turner Road and the substation access point, can provide for entry and exist of all types of vehicles, including the emergency vehicle.
14. The Department notes that no direct access is provided between the substation and the main data centre building and internal road. The Department requests clarification and justification for the separation of access to the substation from the rest of the site.

Remediation

15. The Department requests a copy of the Remedial Action Plan (RAP) in order for the Department to be satisfied the site will be made suitable for the proposed development.

Management and Mitigation Measures

16. In light of the comments provided above, the Department requests that the list of management and mitigation measures in Appendix F of the EIS be updated to reflect any corresponding amendments to the technical reports, including any revised operational mitigation measures for noise emissions.