Appendix F - Mitigation Measures Table

Environmental Impact	Mitigation Measures	Residual Impact
Air Quality and Dust **Impacts during construction works**	**Construction Air Quality Management Plan** is to be prepared and endorsed by the PCA prior to issuance of a Construction Certificate. The CAQMP is to reflect the content and recommendations of the Air Quality Impact Assessment prepared by SLR dated May 2025.	**Low**
Hazardous and Risks **Direct contact with hazardous materials for indoor occupants or maintenance workers**	**Review of RHSEPP Screening** Goodman shall re-assess their site against the *State Environmental Planning Policy (Resilience and Hazards) 2021* in the event that storage quantities of Dangerous Goods increase. **Preparation of Work Health and Safety Documentation** Documentation required by the Work Health and Safety Regulation 2017 (Ref. [2]) specific to the site classification based upon the quantity of goods stored shall be prepared for the site prior to occupation **Design Requirements:** • The design requirements detailed within this report shall be adhered to in the development of the design for the facility. • The cell manufacturer shall ensure that the Li-ion battery modules and BMS are compliant with the testing requirements of UL9540A, or the more contemporary version (Ref. [4]). • FM Global Datasheet 5-32 shall be adopted as the design basis for the facilitation with respect to the lithium ion batteries, as appropriate as determined and agreed with FRNSW through the Fire Safety Study Process. • Personnel shall be trained to ensure that the inactive leaf remains in the closed position when not in use. • At least one (1) carbon dioxide portable fire extinguisher shall be provided on each floor. **Documentation Requirements:** • A Fire Safety Study shall be prepared in accordance with HIPAP No. 2. • A Dangerous Goods Register, indicating the type of chemical, any notations that may be required from the risk assessment and the Safety Data Sheet for the chemical. • Placard Schedule.	**Low**

	• A Manifest and notification shall be submitted to SafeWork NSW. • A DG Risk Assessment of the storage and handling areas. • An Emergency Response Plan (ERP).	
Transport, Traffic, Parking and Access **Temporary increased traffic volumes, trip generation and vehicle queuing. Impacts to vehicle circulation and parking.**	**Construction Traffic Management Plan** A Construction Traffic Management Plan is to be prepared and endorsed by the PCA prior to issuance of a Construction Certificate. The CTMP is to reflect the content and recommendations of the Preliminary CTMP prepared by ASON dated May 2025. **Green Travel Plan** A Green Travel Plan is to be prepared and endorsed by the PCA prior to issuance of a Construction Certificate. The GTP is to reflect the content and recommendations of the Preliminary Green Travel Plan prepared by ASON dated May 2025.	**Low**
Trees and Landscaping Tree removal and tree protection works	**Tree Removal** 49 trees required to be removed to facilitate the development with a further one tree to be removed irrespective of development due to poor health. **Tree Retention** • 14 trees recommended for retention with generic, and in some cases specific, protection measures during construction as specified in Arboricultural Impact Assessment dated May 2025. **Commissioning of Project Arborist** • A project arborist must be commissioned to oversee all tree protection measures, approved works within Tree protection zones (where necessary) and complete regular monitoring and compliance certification. **Tree Replacement/Offsetting** • Offset tree planting must reflect the number of subject trees removed and the initial loss of amenity and biomass at a ratio of 1:1 as provided within Landscape Plans dated May 2024.	**Low**
Noise	**Construction** The use of standard mitigation measures to minimise the impacts is considered sufficient to control the majority of the impacts. Examples of measures that could be applied to the work are provided in the Transport for NSW Construction Noise and Vibration Guideline. No works outside of Standard Construction Hours are currently proposed.	**Low - Moderate**

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Noise generation during construction phase and from back up generators during operational phase	A Construction Noise and Vibration Management Plan (CNVMP) would be prepared before any work begins. This would identify all potentially impacted receivers, assess the potential noise and vibration impacts from the proposal and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures. The CNVMP would also contain procedures for handling complaints, should they occur, and detail any compliance monitoring requirements.	
	Operational Noise Impacts Where operational noise impacts from the development are predicted to exceed the relevant noise criteria, feasible and reasonable operational noise mitigation and management measures identified in the Amended Noise and Vibration Impact Assessment dated May 2025 should occur.	**Low - Moderate**
Cultural Heritage **Impacts of construction activities on unknown Aboriginal objects**	**Aboriginal Cultural Heritage Management Plan (ACHMP)** An ACHMP must be prepared in consultation with registered Aboriginal stakeholders and must be approved by the NSW DPHI Environmental Representative and/or NSW DPHI prior to the commencement of further archaeological investigation. The ACHMP is to provide guidance on: • Key project approvals information for Aboriginal heritage, • Ongoing consultation with registered Aboriginal parties, • A methodology for archaeological investigation of Kent Rd PAD1 and reporting on the results of those activities. The intention of the archaeological investigation is to test the nature and extent of archaeological remains on site subsequent to demolition of extant built structures. • The methodology will apply to the whole site, and include triggers for when archaeological investigation is required, such as when natural contexts associated with Kent Rd PAD1 are encountered that will be harmed by the proposed works • An unexpected finds procedure The following timing considerations should be taken into consideration in preparing the ACHMP: ○ Demolition of extant structures ○ Design and constructability information – relevant design and constructability information, particularly approach to the piling foundation works, will be required to inform the archaeological investigation methodology The ACHMP must be prepared in consultation with registered Aboriginal stakeholders, and must be approved by the NSW DPHI Environmental Representative and/or NSW DPHI prior to commencement of further archaeological investigation. As the presence, and significance, of Aboriginal objects in the study area is unknown, the results of any archaeological investigation on site will be assessed in a results report. Should it be concluded that Aboriginal objects are present on site and will be harmed by the proposed works, it is anticipated that the archaeological	**Low**

	results report, significance assessment, impact assessment, and records of continuing consultation with registered Aboriginal stakeholders will be submitted to NSW DPHI as part of a management process. Depending on the results and recommendation of that report it is possible that archaeological salvage excavation will be required as part of and/or prior to the main works program. If changes are made to the proposal that may result in impact to areas not assessed by this ACHAR, further assessment must be undertaken	
Stormwater Management **Cumulative impacts of stormwater drainage**	Site-wide stormwater network to be designed in accordance with SSDA Civil Engineering Report Incorporating Water Management dated May 2025 and include: • Adequate batter slopes and shoring analysis for bulk excavations. • Proof rolling of final subgrades after excavation to confirm adequately soil properties. • CBR testing undertaken at subgrade level for pavement layouts. • Stormwater on-site detention for 1% AEP design storms and all minor storms, has been designed in order to satisfy the design requirement for post discharge and therefore adheres to the DCP guidelines. • A preliminary stormwater treatment design has been developed which includes Ocean Protect Oceanguards or equivalent and 25 x 690mm Ocean Protect PSorb StormFilters or equivalent to reduce the pollutant target through the site. • A preliminary pavement design is proposed based on 2% CBR subject to revise based on further investigation in detail design stage	**Low**
Contamination and Remediation **Unexpected finds with the potential to impact future human or ecological receptors**	Suitable implementation of remediation measures to be undertaken in accordance with the Remedial Action Plan dated May 2025 and ongoing passive management of certain intrusive works into residual contaminated soils and impacted groundwater under building slabs, pavement and a marker layer will be required via appropriate implementation of a passive long-term environmental management plan.	**Low-Moderate**
Infrastructure and Utilities **High noise levels when testing or operating back-up generators** **Fuel spills when filling generators** **Fire and explosion risks associated with the generators & switching station**	• The Proposal are to have data centre specific electrical supply. Electrical authorities have acknowledged the formal request and currently providing connection options to the client. • Generators are indoor acoustically treated. The noise level of generator testing will be assessed against NSW Noise Policy for Industry. A minimum of 2 generators will operate at any one time during testing and normal operation. • Fuel tanks will be designed to comply with AS1940. Each fill point will have all ancillaries to meet requirements of AS1940.	**Low**

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	• Generators fuel system will be designed in accordance with AS 1940 which defines location in the building and separation between the tanks. Generators and bulk fuel tanks located inside a secure plantrooms only approved personnel can access this area. • HV switching station will be designed by a certified Level 3 ASP designer in accordance with relevant current version of Australian Standards and Industry Associations Standards and Guidelines. Switching station located inside secure plantroom area only approved personnel can access this area. • Two separate mains supply routes are proposed and the probability of mains failure has been investigated for the electrical supply. Failure rates for a supply in this arrangement are extremely low meaning the generators will rarely be used. Generators will include specific emissions control measures to Australian EPA requirements. Spatial provision has been considered for selective catalytic reducers (SCR) to be retrofit where required. A maximum of 2 generators will operate at any one time during testing and normal operation. • To minimise the peak water demand on Sydney Water's potable water network, the preliminary water balance of the proposed site has been undertaken through the use of rainwater re-use tanks and the provision of fire and water storage tanks on site. Consultation with Sydney Water through the design process has confirmed that the precinct wide water and sewer networks will be designed to cater for peak day flows from the final configuration of the data centre. • Water overtopping from the rainwater tanks will discharge to the stormwater system. Discharged water will not contaminate the surrounding environment as it will be discharged via gravity into the civil stormwater OSD tank and discharge to the utility network through water quality treatment measures (WSUD). • Each of the administration buildings is concurrently connected to the Eastern and Western Points of Entry, providing the operator with the ability to utilise a physically diverse service in the event of failure. All telecommunications pathways are physically separated by a minimum of 20m to minimise risk of concurrent damage to multiple pieces of telecommunications infrastructure.	
Social Impacts	**Communications and Engagement Strategy** Preparation and implementation of a robust Communications and Engagement Strategy for the construction and initial operation of the site. This Strategy should include detail regarding complaints management, channels of communication for local residents and businesses, and regular project updates including for major construction works. **Social Procurement Strategy** Project team to consider introducing a mechanism to provide a Social Procurement Strategy for construction and operational stages. This should include provision for a percentage target for local employment and the	**Low**

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	employment of persons experiencing socio-economic disadvantage. This may include as a contractual requirement for future contractors and tenants. **Operational Management Plan** The OMP implemented for the proposal will include the following: • A buddy system for workers travelling to and from the centre by foot during off-peak times (e.g. 8pm-7am) • Alignment with WorkCover NSW's Health and Safety Guide ShiftWork: *How to devise an effective roster* • Training and education on health sleep practices for night-time shift workers. This is recommended to include alignment with Oxford Sleep Research Society's *'Healthy Sleep Practices for Shift Workers Guidelines'*	
Cumulative Construction Phase Impacts	A Construction Management Plan shall be prepared prior to the construction certificate to minimise potential cumulative construction impacts. The CMP should identify and assess potential cumulative construction-related impacts (e.g. noise, vehicle movements, pedestrian safety) associated with other surrounding developments. Mitigation and monitoring measures should be provided for all identified cumulative construction impacts.	**Low-Moderate**
BCA Compliance	Performance Solutions to satisfy the Performance Requirements of the BCA have been proposed to account for non-compliances with the Dts provisions as identified in the BCA Report prepared by MBC Group dated May 2025 to address non-compliances.	**Low**

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