

Our ref: STACK SYD01 Data Centre, Erskine Park (SSD-82211208)

Mr Michael Dyer
Project Director
STACK INFRASTRUCTURE AUSTRALIA PTY LTD
201 Sussex Street
Sydney NSW 2000

27 May 2026

Subject: STACK SYD01 Data Centre, Erskine Park – Additional matters for submissions report

Dear Mr Dyer

I refer to the Department's previous correspondence dated 5 May 2026 which requested the provision of a submissions report in response to issues raised in public submissions and the advice provided by agencies on the Amendment Report.

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:

Generator Operations

1. The Department requests additional information on how electricity supply and load would be managed during maintenance (planned and unplanned) or repair of:
 - transmission provider (i.e. Transgrid) assets,
 - the on-site electrical infrastructure, including substation/s, and
 - off-site electrical infrastructure.

Justification for the use of diesel generators (including details on total number of generators and hours operated) in these circumstances must be provided.

2. The Department notes that the EIS and supporting technical assessments only consider the scheduled generator maintenance testing under standard operating scenarios in which the back-up diesel generators would be operated. The Department understands there may be additional scenarios in which the generators would be operational including, but not limited to planned and unplanned maintenance, and system level testing.

The operation of the back-up power system has implications for the modelling of supporting technical assessments including air quality, operational noise and direct greenhouse gas emissions. Therefore, the Department requests that all relevant technical assessments be updated to consider all operational scenarios of the back-up power system, to ensure likely impacts are accurately characterised and appropriately mitigated. This should include, but not be limited to:

- planned and unplanned maintenance events / repair events described at 11. above, and
- system level testing.

Noise Impacts

3. Further to the issues previously identified in the Request for Additional Information letter issued by the Department, dated 24 December 2025, the Department has identified additional issues in the Noise and Vibration Impact Assessment (NVIA) in Appendix M required to be addressed in an updated NVIA as follows:
 - The Department understands that one (1) load bank will be operational during generator testing scenarios but has not been identified as a noise source included in the acoustic modelling. The NVIA should be updated to identify all operational noise sources and included in the acoustic modelling accordingly.
 - The Department notes that a number of exceedances are identified during Stage 1 operational scenarios of the night-time period (scenarios 3 & 6) however only one (1) exceedance is identified during Stage 2 (scenario 15) operational scenarios of the night-time period, which is understood to be a more intensive operational scenario of the whole

development. The Department requests the NVIA be updated to provide further discussion and analysis of the results considering the difference in operational scenarios and operational noise sources modelled.

4. The Department requests further details on the modelled 'full load' scenarios to demonstrate the modelled scenarios are representative of realistic operating scenarios. Details should include, but not limited to, the likelihood and duration of full load operations.
5. The Department notes the NVIA maintains adopting a separate sensitive receiver grouping (NCA1) and 'Urban' amenity criteria. The Department considers that unattended monitoring locations NL1 and NL2 both have daytime rating background levels less than 45 dB(A), which is commensurate with typical background levels categorised for the 'Suburban' amenity category.

Further to the above, the Noise Policy for Industry (NPfI) notes that the presence of characteristics which vary from the typical existing background noise levels and description (Table 2.3, Columns 3 and 4 of the NPfI) in one day, evening or nighttime period does not necessarily outweigh the characteristics of the other relevant periods.

Therefore, the NVIA should be updated to consolidate NCA1 and NCA2 with the adoption of the 'Suburban' amenity category or provide strong justification for the use of the Urban amenity category, addressing requirements identified in EPA's implementation note on Determining the Noise Policy for Industry Noise Amenity Category for Residential Receivers.

6. The NVIA should be updated to provide one-third octave band noise levels at receiver locations to confirm the applicability of tonality and low-frequency noise adjustments in accordance with Fact Sheet C of the NPfI.
7. As per Item 2 above, the NVIA should be updated to consider all operational scenarios of the back-up diesel generator power system.

Air Quality

8. The Department notes the proposed generator emissions performance is identified as being below Tier 1 performance standards. The Department agrees with the recommendations of the NSW Environment Protection Authority (EPA) dated 8 May 2026 and considers that all practical measures to reduce potential pollution emissions should be undertaken including, but not limited to, the installation of Tier 2 emissions performance generators or better. In particular, the Department notes that significant exceedances of the NO₂ criteria are predicted at sensitive receiver locations during an emergency scenario event and all feasible and reasonable measures to reduce and mitigate potential impacts should be thoroughly investigated and implemented accordingly.
9. As per Item 2 above, the Air Quality Impact Assessment (AQIA) in Appendix L should be updated to consider all operational scenarios of the back-up diesel generator power system.

Management and Mitigation Measures

10. In light of the matters raised above, the Department requests that the list of management and mitigation measures provided in Appendix C of the EIS be updated to reflect any corresponding amendments to the technical reports, including any revised operational mitigation measures for noise emissions. The updated list of mitigation measures should be submitted in both Microsoft Word and PDF formats.