

10 April 2026

Our reference: 232145, 228426

Patrick Copas

Department of Planning, Housing and Infrastructure
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cc: Shaun.Williams@planning.nsw.gov.au

RE: State Significant Development Application SSD-92743706 at 706-752 Mamre Road, Kemps Creek (AirTrunk)

Mamre Road Data Centre Campus

Thank you for notifying Sydney Water of SSD-92743706 at 706-752 Mamre Road, Kemps Creek, which seeks the staged construction and operation of six (6) x four-storey data centre buildings with a power capacity of 1 GW for a 24/7 Data Centre Campus and associated civil/stormwater works. The development seeks to facilitate 500 operational jobs. Sydney Water has reviewed the application based on the information supplied and provides the following Sydney Water requirements to assist in understanding the servicing needs of the proposed development.

We have reviewed the following documents supplied and provide the following comments to assist in understanding the servicing needs of the proposed development.

- EIS 706-752 Mamre Road dated 2/2/26
- Appendix 4 Architectural Drawings Full Package dated 7 November 2025
- Water and Stormwater Management Plan (WSMP) by AT&L Issue 2 dated 25/11/25.
- Civil Works Package (Drawing Series Civ-02000) by AT&L Issue 2 dated 23/10/25.
- Flood Impact and Risk Assessment by AT&L Issue 2 dated 25/11/25.
- Landscape Drawings (Drawing Series LAN-00000) by Greenbox and Geoscapes Issue 7 dated 03/02/26.

Sydney Water is unable to support SSD-92743706 without further study. Sydney Water is currently in discussions with the proponent to enter into a Sydney Water Planning Agreement to undertake a detailed Planning assessment to fully assess water demand options and wastewater impact. It is anticipated that the planning assessment will commence imminently and conclude in Q4 2026. Accordingly, it is requested that DPHI defer SSD-92743706 and re-refer once outcomes of the assessment have been finalised. More information on the current servicing position can be found in attachment 1.

The Proponent is also advised to address Sydney Water's stormwater comments in Attachment 2 to avoid any potential delays in satisfying Sydney Water's stormwater requirements.

Next steps

- **The Department is advised to re-refer SSD-92743706 to Sydney Water for review once the outcomes of the Planning Agreement is finalised (Anticipated for Q4 2026) and stormwater comments/requirements have been addressed.**
- The proponent is advised to address the stormwater comments and requirements listed in Attachment 2.
- The proponent is advised to continue liaising with Sydney Water on the Planning Assessment and the Sydney Water anticipated Section 73 application under CN228426.

This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the [Land Development Manual](#).

This response has been undertaken based on the estimated average day potable water demand of 6,221 kl/day, average recycled water demand of 55,987 kl/day and average wastewater discharge demand of 12,442 kl/day provided as part of the Sydney Water Feasibility Application (Case No. 223420). Should there be any changes to these demand figures, updated information will need to be submitted for review.

The Department can read further advice on requirements for this proposal in Attachments 1 and 2. If the proponent has any questions, they should contact their Sydney Water Account Manager, danijela.simic@sydneywater.com.au or their Sydney Water case manager under CN228426. Should the Department require further information, please contact Joanne Chan from the Growth Analytics Team at urbangrowth@sydneywater.com.au.

Yours sincerely,



Kristine Leitch

Manager, Growth Analytics and Strategic Partnerships
Growth and Development Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- Attachment 1 – water and wastewater servicing overview
- Attachment 2 – Stormwater Comments

Attachment 1 – Water and Wastewater servicing overview

Water and Wastewater Servicing

- The proposed development is located within Cecil Park Water Supply Zone (WSZ) and lies within the catchment of SP1221 within the Mamre Road Precinct, which discharges into Upper South Creek Advanced Water Recycling Centre (AWRC).
- The existing drinking water system has **limited capacity** to serve the proposed development and may require trunk network upgrades.
- The capacity of SP1221 and associated network infrastructure **were not designed** to handle the significant discharge anticipated from Data Centres.
- The development is located in a high growth area (including potential for other data centres) in addition to the Western Sydney Aerotropolis Growth Area.
- The broader system context needs to be considered in developing a holistic servicing solution.
- Sydney Water is currently in discussions with the proponent to enter into a Planning Agreement, resulting in a Planning Assessment being undertaken to investigate viability of servicing solutions collaboratively. This study will be through a mutually agreed Planning Agreement, at the proponent's cost.
- **It is anticipated that the planning assessment will commence imminently and conclude in Q4 2026.**

Recycled Water Servicing

- The Mamre Road Precinct Recycled Water (RW) scheme is expected to be completed by 2028. The scheme has limited capacity that cannot accommodate this development directly in the short term. However, alternative supplies are being investigated by Sydney Water and will form part of the detailed planning assessment outputs.
- The long-term servicing strategy of data centres is to be supplied with recycled water.
- Once alternative water sources (stormwater and recycled water supply) is established, the connections between the potable water and recycled water networks will need to be decommissioned.
- Prior to obtaining RW connection approval, the following is required:
 - Smart meter installation,
 - Confirmation of indoor and irrigation demands from the developer
- Notwithstanding the above, the outcomes of the Planning Assessment may provide further Recycled Water requirements.

Stormwater

- Sydney Water requests clarification and additional information related to Stormwater be provided before further advice can occur. This includes (but is not limited to) updates to the Water and Stormwater Management Plan, Civil Drawings and MUSIC modelling to address inconsistencies, justify proposed changes and align with stormwater initiatives/targets. Refer to **Attachment 2** for further details.

Attachment 2 – Stormwater Comments

1. Catchment Delineation and Discharge Locations

Sydney Water has assessed the proposed catchment modifications based on Sydney Water's design catchments in the vicinity of the development site, existing catchments and proposed catchments. Comments based on this analysis are as follows:

- WSMP Figure 8: Add parcel numbering to figure for clarity and ensure it aligns with numbering used in the Civil Works Package. Please also add catchment areas (in ha), change in catchment areas (pre- versus post-development), and show associated OSDs/discharge points clearly. Ensure this figure aligns with catchment plans shown in the Civil Works Package.
- Provide the catchment area for the Southern Link Road as it is missing from Civil Works Drawing CIV-02102. Clarify if it is the exact same area as the 'Landscaping Catchment Bypass 01-04' catchments, and if not, indicate how 'Landscaping Bypass' catchments discharge. Sydney Water require this information to determine impact on the wider scheme strategy. Sydney Water acknowledge the ownership of this future road is by others.
- Due to the complexity of the delivery of Regional Basin 23, Sydney Water is in discussions with the Developer about an interim diversion of low flows (treatable flows) from the northern tributary catchment to Regional Basin 4 (via the south-western corner discharge point) to allow the developer to unlock more of their site for development, prior to the construction of Regional Basin 23. High flows from the northern tributary catchment would still discharge to the northern boundary. Please ensure the WSMP, Civil Works Package and MUSIC modelling are updated to capture all components (e.g. diversion structure, interim rainwater tanks) that are required to enable this.
- Given high flows still discharge towards the northern boundary, a GPT and OSD may be required for the catchment that goes to that discharge point.

2. Trunk Drainage Channel

Please refer to Sydney Water's Draft Stormwater Scheme Infrastructure Design Guidelines (Aug 2024) and Tables 1 and 2 of the [Appendix C Engineering Requirements Checklist](#) for design requirements for the trunk drainage channel.

As stated in Section 5.3 of the WSMP, Sydney Water notes that the information submitted regarding the Trunk Drainage Channel is preliminary and that further design refinement will be coordinated during the detail design phase.

With respect to the current SSD documents, upon comparison with the approved trunk drainage channel design for SSD-30628110, Sydney Water has the following comments:

- 25-1282-D-100-A of the Flood Impact and Risk Assessment (FIRA) shows some flooding on the north side of the upstream portion of the trunk drainage channel during the 1% AEP event. 1% AEP event should be contained within the channel with 500 mm freeboard.

- WSMP states channel width is 15.5 – 19.5m, whereas CIV-02110 shows channel widths between 16.0 – 20.0m. Please clarify and align.
- Section 7.1 of the WSMP states ‘...hydrological and hydraulic modelling of channel flow will need to be undertaken to simulate post-development conditions for a range of design storm events...’. Please clarify if this is different to the modelling done in the existing FIRA.
- Trunk drainage landscaping plan, cross sections with water levels (minor event and 1% AEP + freeboard), solar access assessment, planform, drop structure modelling / details, and irrigation to be confirmed during detail design.

Civil Works Package CIV-02110 (Trunk Drainage Channel Plan):

- Show A-27 and A-28 of the pit/pipe system (which continues from CIV-02041) clearly and provide annotations to show how they connect into the trunk drainage channel. Ensure this aligns with the longitudinal section on CIV-02123.
- Connection between trunk drainage channel and outlet settling forebay has been changed from 3 x 750 x 750 RC box culverts to an outlet swale. Please justify the change and provide dimensions or a cross section/detail for the outlet swale.
- Sandstone retaining wall is shown on the plan view drawing at Sections 4 and 5, but not shown in the sections on CIV-02112. Please align.
- Civil Works Package CIV-02111 and CIV-02112 (Trunk Drainage Channel Typical Sections):
- Indicate where Sydney Water can access the trunk drainage channel for maintenance. Please also provide dimensions of the maintenance access path.
- Provide FFLs of parcels in all sections.
- Add a longitudinal section of the trunk drainage channel.

3. Additional Comments/Clarifications

- WSMP Tables 12 and 13: The results in these two tables are identical. It seems unlikely for this to be possible given the different sizes and characteristics of the western and eastern catchments. It appears that results have been extracted from the receiving node rather than ‘East’ and ‘West’ nodes in MUSIC. Please check or clarify.
- WSMP Section 7 refers to SSD-30628110. Please check SSD number.
- Civil Works Package CIV-02059: Show how catchment drains to OSD tank and how OSD tank discharges.
- Please align street tree details in drawings CIV-02020 and LAN-00401.
- Road that goes west from roundabout has been removed. This reduces street trees and may impact compliance with stormwater targets. Indicate how this can be mitigated.

- Note: if it can't be mitigated the developer is to discuss with Sydney Water and there will likely be additional funding required to increase the size of the regional basin to compensate for reduction in water quality or flow reduction by removal of street trees.
- Sydney Water notes that the proposed development has a large quantity of diesel and potentially other harmful substances stored on site. There will need to be suitable measures in place to prevent discharges of these into the stormwater system that will impact the downstream regional trunk drainage and basins. DPHI will need to be satisfied that the mitigation measures proposed reduce the risk of hazardous substances entering the stormwater system/s.

4. Storm water additional note to DPHI

Sydney Water is working with the developer on a diversion of the low flows (treatable flows) from the northern tributary catchment to the South Creek catchment. Sydney Water will provide more detail once approved. Changes because of the diversion will be addressed in the RtS.

WSMP Table 17: Runoff volume targets are not met for the eastern catchment. DPHI to assess whether this is acceptable.