

Our ref: Mamre Road Data Centre Campus (SSD-92743706)

Mr Adam Pavlovic

Project Manager

PLAN PROJECT MANAGEMENT PTY LTD

Level 1, Shop 2A

17 Macmahon Street

Hurstville NSW 2220

24 April 2026

Subject: Mamre Road Data Centre Campus – Additional matters for submissions report

Dear Mr Pavlovic

I refer to the Department's previous correspondence dated 8 April 2026 which requested 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 submissions and agency advice already received, you are required to submit additional information that addresses the matters listed in **Attachment 1** of this letter.

The Department has concerns about the consistency of the proposal with the draft Sydney Plan (draft plan) and draft Statewide Policy for Industrial Lands (draft policy) which identify the site as State significant industrial land to be preserved for strategic freight and logistics developments. The strategic importance of the site, as identified in the draft plan and draft policy, was also raised in submissions by the NSW Freight Transport Advisory Council and national port, freight and logistics organisations. The Department requests you consider and advise how the proposed development is consistent with the objectives of these plans.

In addition, the Department and other government agencies have identified a number of other concerns with the proposal. These relate to potential impacts on sensitive receivers and local amenity, and delivery of key road infrastructure in the Mamre Road Precinct. These and other concerns are further detailed in the advice received from the NSW Environment Protection Authority (EPA), Transport for NSW and the submission from Penrith City Council.

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,

A handwritten signature in dark ink, appearing to read 'C. Ritchie'. The signature is fluid and cursive, with a small dot above the 'i'.

Chris Ritchie

Executive Director

Energy, Resources and 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:

Strategic Planning

1. The Department has concerns about the consistency of the proposal with the draft Sydney Plan (draft plan) and draft Statewide Policy for Industrial Lands (draft policy) and requests that you provide further information on how the development is consistent with the draft plan and draft policy. This has also been raised by a range of other parties as a key issue for the proposal.

Statutory Compliance

2. We note that concurrence from TfNSW is required under s 2.35(1) of the Industry and Employment SEPP, and TfNSW does not support the development in its current form as detailed in its letter dated 14 April 2026, as the development does not include the partial delivery of the Southern Link Road (SLR).

Given this, the Department requests further information about whether you intend to amend the development application to include the partial delivery of the SLR to benefit the broader Mamre Road Precinct and to achieve concurrence from TfNSW as required under Section 2.35(2) of the Industry and Employment SEPP.

If you do not intend to amend the development application, the Department requests further information on how you intend to address the matters that TfNSW is required to consider under s 2.35(2) of the Industry and Employment SEPP in determining whether to provide concurrence.

3. The EIS has not adequately addressed Section 2.39 of the Industry and Employment SEPP. The Department understands the development proposes to utilise recycled water for the development's operations. Therefore, the Department requires that evidence be provided to suitably demonstrate that recycled water from a water recycling facility will be provided to the development.

Mamre Road Precinct Development Control Plan (DC)

4. The proposed development will substantially exceed the height control in the Mamre Road Precinct (MRP) Development Control Plan (DCP) by more than 30 metres.

The Department will consider whether the exceedance creates significant likely impacts on its surrounds, affect the suitability of the site for development, or affect the public interest.

The Department requests that you provide further information on these significant likely impacts and whether you are considering any amendments to reduce the overall building height.

5. Section 4.2.6 of the MRP DCP stipulates the design of external storage areas should be behind front building setbacks and not visible from a public place. The proposed development proposes tanks fronting the Collector Road and the future SLR.

The Department requests that you provide further information on whether you are considering relocating the tanks and other storage infrastructure from within the front building setbacks to elsewhere on the site.

6. The Department requires updated setback diagrams be provided. Setbacks are to be measured to the nearest structures such as substations and statcom. The SLR corridor must also be excluded from the setback calculation.
7. The SSDA and EIS do not include any details on proposed signage or lighting for assessment. All details regarding proposed signage or lighting is required to be provided.

Infrastructure Servicing

8. The Department acknowledges that power supply to the site is proposed to be achieved from the proposed on-site substation through a transmission line connection to the 330kV Transgrid Sydney West Substation. The Department notes from consultation with Transgrid that development consent for the proposed contestable transmission line is required to be obtained by the Applicant.

In the EIS, you noted your intention to provide information about lead in power works at the submissions report stage. The Department requests that you provide this information.

The Department also requests that you provide further information on whether you intend to either:

- amend the current application to include the proposed transmission line and any associated works within the scope of the development (noting s 4.38(4) of the *Environmental Planning and Assessment Act 1979*), or
- demonstrate the works to provide power supply to the site can be achieved under a separate State significant development planning approval pathway and when such an application is likely to be lodged.

Data Centre Operations

9. The maintenance testing schedule in the EIS provides insufficient detail, is unclear and does not match the maintenance testing schedules provided in the Appendices. In particular, the EIS notes that generator testing is to be undertaken quarterly which implies generators will be tested at least four (4) times per year, however, the Appendices indicate that one (1) annual

test per year for each generator will be undertaken. A clear and detailed description of all maintenance testing scenarios is required which provides the following:

- number and type of tests and non-emergency operational events for each power unit per year
- number of power units to be operated at any one time for each of these events
- duration of each testing event or operational event (including cool down)
- load during testing and operation
- time of the day testing or operation may occur
- maximum number of testing or operational events per day
- total cumulative hours of testing and operation of back-up power units per annum.

10. In the event that maintenance testing is proposed to occur once per year, the Department requests further information on any predictive and/or preventative maintenance measures proposed to be implemented to ensure the back-up generators remain reliable as a result of prolonged periods of idleness.
11. 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.

12. 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 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.

The Department requests that all relevant technical assessments must 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

13. Further to the issues previously identified in the Request for Additional Information letter issued by the Department, dated 25 March 2026, the Department requests a more robust and transparent assessment of noise impacts at nearby schools, having regard the proposed 11-year construction timeframe and the cumulative nature of impacts, including:

- a cumulative assessment of construction and operational noise over the full construction and early operational period, including consideration of prolonged exposure and noise fatigue
- explicit consideration of health, learning and amenity impacts on children, informed by health-based guidance such as the WHO Guidelines for Community Noise
- assessment of the duration of noise exposure at each affected school receiver, rather than predicted noise levels alone
- identification of sensitive activity areas within each school (e.g. classrooms, chapels, libraries, assembly halls, special education areas and outdoor learning spaces) and how these are affected at different times
- consideration of the full range of school uses, including weekend, co-curricular and extracurricular activities, to test the effectiveness of proposed management measures
- a detailed assessment of impacts on the most-affected sensitive receivers, including cumulative effects from key and difficult-to-mitigate sources such as tower cranes, having regard to their number, height, location and operational characteristics
- justification for treating long-duration construction noise as distinct from operational or industrial noise, given the effective permanence of the impact
- a clear rationale for the selection of feasible and reasonable mitigation measures, including consideration of:
 - reducing the scale of development to better respond to surrounding sensitive land uses
 - revising construction staging and phasing to minimise cumulative impacts on schools and other sensitive receivers.

Air Quality

14. The Department notes that the Air Quality Impact Assessment (AQIA) in Appendix J of the EIS has modelled impacted sensitive receivers as receiver type categories instead of individual receiver locations. The Department requires the AQIA to be updated to include the modelling results of all sensitive receiver locations assessed for each modelling scenario.
15. The AQIA is to be updated to provide further justification that the modelled stack locations for operational scenarios M3 - M6 are representative of the most conservative assessment of impacts, particularly with regard to nearest sensitive receivers including the adjacent schools.
16. The Department notes that significant exceedances are predicted to occur during all six emergency scenarios modelled in the AQIA for NO₂, CO and particulate matter (PM₁₀ & PM_{2.5}) however, the AQIA states that no additional management strategies are required. The Department has significant concerns for the potential impacts the development may have on surrounding sensitive receiver locations. The AQIA should be updated to provide detailed consideration and where practicable, the implementation of all reasonable and feasible measures to reduce and manage air pollution impacts during emergency scenario events.

Greenhouse Gas Emissions

17. The Greenhouse Gas Assessment in Appendix 36 of the EIS excludes tenant IT operational emissions as greenhouse gas emissions (GHG) sources and notes that tenant emissions are accounted for under their own Scope 2 and Scope 3 emissions inventories. The Department does not support this position and considers that all direct or indirect GHG emissions as a result of sites operations (whether by the operator or by tenants) are attributable to the development for which consent is being sought.

The Department notes that an updated GHG Assessment Report prepared by E-LAB Consulting, Revision 07, dated 30 March 2026 in response to the Department's Request for Additional Information letter dated 25 March 2026. The Department considers no material changes have been to the report with the exception to removal of reference to tenant IT operational emissions being excluded from GHG emissions calculations.

The Department requests confirmation that tenant IT operational emissions have been included in the assessment of the total predicted direct and in-direct GHG emissions of the development (inclusive of both Applicant and tenant emissions), and the emissions provided are an accurate representation of the development's total GHG emissions.

Traffic and Transport

18. The Transport Management and Accessibility Plan (TMAP) provided in Appendix 10 identifies that the operations of the development would involve three 8-hour shifts for employees which is inconsistent with the EIS which stipulates two shifts over a 24 hour period.

The Department requests confirmation on the proposed employee shifts including approximate number of staff per shift and duration. In addition, the TMAP should be updated accordingly to ensure assumptions in the traffic assessment of employee vehicle movements are accurate.

19. The Department notes the car parking assessment within the TMAP has applied a weighted average of parking spaces per GFA of other data centre development. The Department does not consider this approach to accurately represent car parking demand as the employee generation of a data centre development does not directly correlate with the GFA of the development. The TMAP should be updated to assess car parking demand against a first principles approach which considers the maximum potential of staff and visitors on the site at any time.

Visual Impact

20. The EIS does not clearly identify the proposed height of supporting infrastructure including water tanks and the substations to be able to understand the potential visual impacts of supporting infrastructure within the development setbacks.
21. The Visual Impact Assessment (VIA) provided in Appendix 9 does not appear to show the proposed tank yards and supporting infrastructure such as substations which front Mamre

Road and Bakers Lane. Despite proposed screening, this infrastructure is likely to be visible and should be demonstrated in the photomontages.

22. In addition to the above, the Department notes the photomontages presented from Bakers Lane (particularly Viewpoint 8) do not appear to accurately reflect the appearance of the development from this location, including the presentation of key elements such as the internal estate road and the proposed emergency access driveway (include any associated breaks in the proposed screening structure).
23. The photomontages provided in the VIA must be updated to give a realistic presentation of the development, noting the highest point of the development is 53 m above natural ground level.

Ecologically Sustainable Development

24. The EIS and the Ecologically Sustainable Development (ESD) Report in Appendix 13 of the EIS show water usage as a minimum water demand, and not clearly linked to the targeted water usage efficiency target. Further information must be provided to confirm that the WUE target is capable of being reached, and that a realistic 'worst-case' assessment of the development's water usage has been undertaken. This should take into account both the influence of the urban heat effect and potential climate change impacts over the life of the development.
25. The Department notes that the current Power Usage Effectiveness (PUE) of the proposed development is 1.32, and the applicant will work with tenants "when available" to achieve a PUE of 1.3. The Department emphasises that further measures should be proposed and committed to now, to ensure the development is capable of achieving a maximum PUE of 1.3 from the commencement of operations.
26. The ESD report references renewable diesel, but it is unclear what specific type of renewable diesel is proposed and whether this will be trialled or form a formal commitment for use from the commencement of operation. In this regard, please clarify the type of renewable diesel product proposed to be used (e.g. biodiesel, blended diesel products, HVO, etc), the preferred generator model and the nature of the usage (e.g. trial basis, full implementation, etc).
27. NABERS Agreements to Rate for energy and water (and supporting documents) are required for the office components, COSH and offices in each sub-parcel where the net lettable area is >1,000 square metres. These need to be signed by NABERS and submitted with the SSD application. A Net Zero Statement is also required. The Department requires a signed NABERS Agreement to Rate and Net Zero Statement to be provided.

Architectural Plans

28. The architectural drawings are insufficiently labelled. Include labels for the diesel storage bulk and day tanks, batteries, fire water tanks, offices, high voltage transformers.

Management and Mitigation Measures

29. 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.