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7 April 2026

Shaun Williams
Industry Assessments, Development Assessment and Sustainability
Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Williams,

Submission: SSD-92743706 Mamre Road Data Centre Campus

706–752 Mamre Road, Kemps Creek

1. Introduction

EPM Projects (EPM), representing The Anglican Schools Corporation (TASC) and Mamre Anglican School, wish to submit this response to the State Significant Development (SSD) Application SSD-92743706 for 706-752 Mamre Road, Kemps Creek (the site).

Following review of the exhibited material, as well as other Data centre SSD assessments, and taking into account the context of the School site and the submissions made in regard to SSD-(Summit), the following matters are raised for consideration by DPHI in regard to development of this nature occurring adjacent to a sensitive land use.

2. Interface with Sensitive Educational Land Use

A consistent theme across SSD determinations associated with data centres is the need to appropriately manage impacts were large-scale industrial development interfaces with sensitive receivers.

The scale of the proposed development (comprising six (6) four-storey data halls, 40 m building height, 728 cooling units, 846 diesel generators) directly opposite the school requires clear and targeted consideration and raises concerns regarding compatibility with an established school environment.

While the Mamre Road Precinct has been rezoned for industrial purposes, legacy sensitive uses such as Mamre School remain and warrant a higher level of site-specific assessment than typically applied in standard industrial contexts. To this end, TASC requests that further consideration of potential interfacing issues be investigated further and incorporated into the EIS, so as to ensure any appropriate mitigation measures are captured as part of the determination process.

Additional, more specific impacts are discussed in the sections below.

3. Operational Noise (24/7, Tonal and Low-Frequency)

Noise impacts are consistently identified as a key issue across all reviewed data centre SSDs. Primary sources include cooling units, transformers, and backup generators (including routine testing).

- Tonal and low-frequency noise characteristics, which are typical of this infrastructure, are noted as more difficult to mitigate.

- Even where compliance with the Noise Policy for Industry is achieved, residual and cumulative impacts are often acknowledged in assessment reports. For this application, more specific assessment of these impacts on sensitive land users is required to determine the extent of any impact and identify any potential mitigation measures that would be required.

In this case, the school environment including Mamre Anglican School, Trinity Catholic Primary School, and Emmaus Catholic College particularly during teaching hours, together with the Emmaus Retirement Village, represents a more sensitive receptor than the typical standard residential receivers assessed in other Data Centre SSDAs. Accordingly, this level of sensitivity warrants explicit recognition, and appropriate consideration within the assessment provided in the supporting EIS.

4. Air Quality and Diesel Generator Emissions

The proposal includes diesel storage of 18,056 kL and a large number of backup generators (846 units).

- While operational compliance with EPA requirements is typically demonstrated, assessment reports often identify worst-case scenarios (e.g. emergency operation) where exceedances may occur, albeit infrequently.
- Given the scale of this proposal and the broader industrial development within the precinct (including the approved Summit at Kemps Creek), cumulative air quality impacts present a more relevant consideration as this raises potential health and amenity concerns for students and staff.

Further assessment is required in regard to cumulative air quality impacts of this and other industrial development on sensitive land uses including the schools to the north of the site.

5. Traffic and Road Safety

Traffic is generally considered a secondary issue in data centre developments; however, the construction phase of the projects will introduce a significant volume of traffic that warrants targeted assessment.

- Construction-phase heavy vehicle movements and ongoing servicing traffic will utilise Mamre Road.
- These movements are likely to coincide with school peak periods (drop-off and pick-up), creating potential safety risks for students, staff, and parents (as was previously raised in submission to the Summit SSDA).

DPHI is requested to ensure that the traffic and road safety outcomes that formed part of the Summit SSDA are integrated into any determination for this current application, given the scale, intensity and length of construction traffic impacts upon the school.

6. Visual Bulk, Scale and Amenity

The proposed built form, comprising large footprints and heights of up to 40m, will present a substantial visual presence which will directly impact on the amenity and setting of the schools.

- The development is likely to be visually prominent and dominant from the school campus.
- While the development typology is permissible with consent in the zone, the size and scale of the buildings proposed under this application will result in adverse impacts on visual amenity and perceived environmental quality for students and staff.

DPHI is requested to ensure that the assessment of building height, bulk and scale takes into consideration the adverse visual impacts that will result for the school developments.

7. Hazard and Risk (Fuel Storage and Battery Systems)

The inclusion of large-scale diesel storage and lithium-ion battery systems introduces standard hazard and risk considerations.

- As observed, SSD assessments typically address fire and explosion risk, separation distances, and emergency response planning.
- Given the proximity to the school, these matters warrant careful consideration to ensure appropriate risk mitigation and response measures are in place.

It is requested that the assessment of this application consider how these risks would be managed or mitigated, particularly having regard to potential impacts upon the school developments resulting from managing risks being introduced by this proposal.

8. Urban Heat and Microclimate Impacts

Large-scale data centres, particularly those with extensive cooling infrastructure, are known to generate significant heat loads, and the supporting road and parking infrastructure (absent of extensive landscaping) will contribute to an increased heat impact.

- There is potential for localised urban heat and microclimatic impacts resulting from the proposal, which will impact on the nearby school environments. This may affect outdoor areas within the school sites and overall comfort levels for students and staff.

Additional assessment is warranted to consider the urban heat and microclimate impacts associated with the development.

9. Conclusion:

In summary of the above, this submission requests a targeted assessment of impacts, and consideration of mitigation and management measures in regard to the following:

- Enhanced acoustic treatment and operational controls (including generator testing regimes);
- School-specific air quality monitoring and management measures;
- Traffic management strategies aligned with school peak periods (consistent with previous SSDA submissions for the Summit);
- Consideration of built form and landscape buffers on the site and the associated visual impact upon the school; and
- A dedicated interface or operational management plan addressing the school sites.

Should you have any questions regarding the above please contact Dennis Macan of from TASC via dmacan@tasc.nsw.edu.au to discuss further.

Yours faithfully,

EPM Projects

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