

7 April 2026

Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Madam,

Re: SSD-92743706 - Mamre Road Data Centre Campus 706-752 Mamre Road, Kemps Creek

1. Introduction

This submission has been lodged on behalf of the Trustees of the Catholic Church of the Diocese of Parramatta in relation to the following social infrastructure located immediately to the north of the site of the proposed Mamre Road Data Centre Campus (“the SSD”):

- **Emmaus Catholic College** – is a secondary school registered by the New South Wales Education Standards Authority (NESA) as a member of the Catholic system of schools in the Diocese of Parramatta. It provides secondary education to 700 male and female students from Years 7 to 12 and employs 92 full time staff.
- **Trinity Catholic Primary School** – is a primary school registered by the New South Wales Education Standards Authority (NESA) as a member of the Catholic system of schools in the Diocese of Parramatta. It provides primary education to 250 male and female students from Years K to 6 and employs 46 full time staff.
- **Emmaus Retirement Village** - is operated by Catholic Healthcare and comprises 23 one, two and three bedroom independent living units and associated support facilities and a residential aged care facility of 64 beds providing dementia and general care to seniors.

These uses support highly vulnerable populations (children, elderly and frail-aged residents) and constitute essential social infrastructure. They are co-located in a campus setting at 62-209 Bakers Lane, Kemps Creek comprising Lot 2 in DP556036 (“the Trustee land”) (see **Figure 1**) on the following page.

Together with the Mamre Anglican School, a Years K to 12 school with approximately 620 students, these facilities form a cluster of important social infrastructure being impacted individually and cumulatively by State significant developments in the locality. The three schools collectively support over 500 students, employ approximately 450 staff and provide accommodation for approximately 130 aged care residents.



Figure 1 – Facilities of the Trustees of the Catholic Church of the Diocese of Parramatta

2. Grounds for Objection

The SSD fails to adequately address cumulative impacts, emergency access, servicing resilience and stormwater feasibility, and places unacceptable and unresolved risk on existing community critical land uses under the care of the Diocese of Parramatta.

2.1 Emergency Services Access and Network Resilience

Mamre Road and Bakers Lane function as the primary access route for:

- emergency vehicles servicing the data centre campus,
- emergency access to schools, and
- emergency access to the retirement village and aged care facility

The surrounding road network has limited redundancy. Any incident, construction activity, congestion or emergency response at the data centre site has the potential to delay emergency response to nearby schools and aged care residents.

The SSD has a 10 year development timeframe as stated in the EIS. This excludes other developments in the area. Extended construction over many years will intensify heavy vehicle

movements and traffic controls, frequently overlapping with school drop off and pick up periods. This introduces unacceptable residual risk that has not been adequately mitigated.

Operational risks are also increased by large scale diesel storage, extensive generator infrastructure, battery energy storage systems and high voltage electrical installations. In a significant incident, emergency resources may be concentrated on the data centre site, reducing precinct wide response capacity.

2.2 Hazard Risk Assessment

The above operational risks require further investigation given the proximity of the SSD to nearby sensitive receivers. The applicant should be requested to undertake a Preliminary Hazard Analysis and to prepare an Emergency Management Plan to identify, assess and manage hazard risks such as fire and smoke impacts, bushfire risk, diesel generator emissions, diesel spills (629,000 litres of diesel) and hazardous goods storage, battery failure and fire and EMF exposure and associate impacts on the health of school children and elderly.

2.3 Utilities and Service Resilience

The scale of the SSD is considerable with 227,600m² of floor space spread across 6 buildings some 40 metres high. This scale places disproportionate pressure on electricity, water and communications infrastructure in an area with limited existing service redundancy.

While the data centre includes on site backup systems, there is no guarantee of priority supply or rapid restoration for nearby schools or aged care facilities during outages, switching works or emergency load shedding events. The scale of the backup is significant with the 32 gensets planned for the site requiring 696,000 litres of fuel to be stored on site to provide 26 hours of backup. It is clear that the SSD will strain existing electrical services in the area including the TransGrid Sydney West Zone Substation, the main supply substation to the area.

Little consideration has been given to **electromagnetic emissions** from the HV power supply proposed for the SSD including high voltage lines and the proposed high voltage substation proposed for the site. An EMF assessment of the infrastructure required for the SSD should be provided as part of this application.

Sydney Water documentation for the Mamre Road Precinct confirms that water servicing solutions are progressive and resolved through later Section 73 approvals, rather than guaranteed at SSD stage, increasing long term uncertainty for community critical uses.

Aged care facilities, in particular, rely on continuous electricity and water supply for medical equipment, climate control, lifts, alarms and resident safety.

2.4 Stormwater Management

The SSD states that stormwater impacts will be managed through on-site attenuation measures and connection to regional stormwater infrastructure planned for the Mamre Road Precinct.

The *Water and Stormwater Management Plan* submitted as part of the SSD application proposes that Phases 1 to 4 inclusive will incorporate a series of interim stormwater management measures in advance of the delivery of, and connection to, Sydney Water's planned regional stormwater infrastructure. Development of the site beyond Phase 4, including phases 1 to 4 inclusive, will rely on the delivery of, and connection to, Sydney Water's regional stormwater infrastructure.

Sydney Water's *Mamre Road Precinct Integrated Stormwater Scheme Plan* (December 2023, updated May 2025) identifies regional stormwater detention and drainage infrastructure that would affect land currently occupied by the school and aged care facility.

The SSD embeds an implicit assumption that the Trustee Land will be acquired, repurposed or displaced to facilitate industrial development, without that outcome being transparently assessed as part of the SSD.

Sydney Water's integrated stormwater scheme documentation explicitly states that where development seeks to proceed ahead of regional stormwater infrastructure delivery, industrial proponents must fully accommodate stormwater impacts within their own site in order to "unlock" development capacity.

Sydney Water has also clarified that scheme layouts and MUSIC models are indicative, continuously updated, and cannot be relied upon where development staging differs from infrastructure delivery timing.

Consent should not be given to the SSD because it relies on an integrated stormwater scheme not yet provided. The SSD should make provision for stormwater management independent of the Sydney Water's integrated stormwater scheme plan for all stages of the development. Failure to do so would have a potential detrimental impact on the Trustee land.

2.5 Fundamental Inconsistency in the SSD

The SSD relies on three incompatible assumptions:

- reliance on future regional stormwater infrastructure,
- identification of stormwater impacts on school and aged-care land, and
- commencement of development prior to regional stormwater delivery despite Sydney Water requiring full on-site detention in those circumstances.

The proposal has not demonstrated that on-site detention alone is sufficient. In the absence of permissible reliance on precinct infrastructure, the SSD fails to demonstrate servicing feasibility and cannot justify impacts or pressure on current community-critical land.

Stormwater impacts should be managed at their source and not displaced onto unrelated, vulnerable land uses.

2.6 Disproportionate Impact on Vulnerable Populations

Children and elderly residents are particularly sensitive to emergency delays, service disruption and long-term land-use uncertainty. The proposal exposes the school and aged care communities occupying Trustee land to cumulative and systemic risk over an extended period without adequate safeguards, contrary to principles of social sustainability, equity and sound planning.

2.7 Infrastructure Funding

It is noted that the construction of the northern access road was to be funded in part by the current approved development on the site (the Summit development) as a requirement of its development consent. Should this now not happen, the Department is confirm the funding

mechanism for this upgrade to ensure that it is completed in order to accommodate the traffic associated with the Mamre Road Precinct development.

2.8 Cumulative Impacts of the Mamre Road Precinct

The proposal must be assessed in the context of the broader Mamre Road Precinct within the Western Sydney Employment Area. This Precinct is in close proximity to the Western Sydney Airport with industrial land in high demand for a range of airport related purposes.

The precinct is subject to multiple concurrent SSD applications, overlapping long term construction programs, intensifying freight and industrial traffic, incomplete infrastructure delivery and shared reliance on Mamre Road as the primary access corridor.

Sydney Water's *Mamre Road Precinct Integrated Stormwater Scheme Plan* (December 2023) and subsequent update (May 2025) confirm that regional infrastructure delivery is staged, subject to ongoing refinement and not guaranteed at SSD stage.

The SSD assesses impacts largely in isolation and does not adequately address the cumulative burden placed on existing sensitive community uses that derive no benefit from the development.

3. Conclusion and Requested Outcome

For the reasons outlined above, the proposal:

- does not adequately address cumulative impacts,
- introduces unacceptable emergency access and service-resilience risks,
- relies on stormwater infrastructure that is neither secured nor permissible under Sydney Water requirements, and
- creates unjustified pressure for displacement of existing community infrastructure.

This submission therefore requests that the Minister for Planning and Public Spaces:

1. Refuse SSD-92743706; or
2. At a minimum require:
 - full on-site stormwater detention without reliance on external land,
 - removal of any assumed stormwater impact on school or aged-care land,
 - independent cumulative emergency access and servicing analysis,
 - an assessment of electromagnetic field impacts of the development,
 - a Preliminary Hazard Analysis should be undertaken and an Emergency Management Plan should be prepared and
 - re-exhibition of any amended proposal.

Furthermore, in the event that approval is granted, the DPHI is requested to establish and run a Construction and Operational Management Committee which is to facilitate coordination of construction traffic and manage other impacts of the development having regard to school operations and special events programs and aged care operations including patient transport.



This should include implementing the restriction on access to and from Bakers Lane during construction of this SSD (except for emergency vehicle access) as is proposed in the SSD application.

We thank you for the opportunity to comment on this proposed development.

Yours sincerely,

BBC Consulting Planners

A handwritten signature in blue ink, appearing to read 'Dan Brindle', is written over a light blue horizontal line.

Dan Brindle
Director