2 April 2025

Chris Ritchie
Director, Industry Assessments
NSW Department of Planning and Environment
4 Parramatta Square,
12 Darcy Street,
Parramatta NSW 2015

Dear Chris,

**RE: Submission in Response to 1-5 Khartoum Road Data Centre State Significant Development Application (SSD-63235720)**

We refer to the Exhibition of State Significant Development Application SSD-63235720. As you know, we are the adjoining landowner to the east at 17-23 Talavera Road. We have invested in building a highly certified sovereign data centre campus that supports government, critical infrastructure and hyperscale workloads.

We believe that the proposed development will negatively impact our data centre operations and/ or potentially create risk to our facility. As a result, we seek further mitigation measures from the Applicant. For the reasons set out below we **oppose** the proposed development under SSD-63235720 and raise the following matters for the Department's consideration:

| Reference | Topic | Comments |
|---|---|---|
| EIS Page 87 | Construction air quality | The Applicant is proposing significant excavation into the sandstone for its ground level structures. The neighbouring sites are operational data centres which are highly sensitive to dust and other particulates.<br><br>We believe that it is appropriate that the dust suppression and air quality mitigation measures are further developed to include monitoring to neighbouring buildings and the fitting of filters, barriers or similar dust mitigation strategies to the sensitive receivers next door. We believe that the current plans are too generic for construction activities close to sensitive receivers. |

**Macquarie Data Centres Pty Ltd**

**Level 15**
**2 Market Street**
**Sydney NSW 2000**

**1800 004 943**
**macquariedatacentres.com**

**ABN 11 612 259 391**

| | | |
|---|---|---|
| EIS Page 91 | Operational noise and environmental impact – noise modelling | At page 66 of the EIS the Applicant notes Council's concern regarding the cumulative impact of having three data centres in a cluster. Council commented:<br><br>*"Cumulative impact assessments are required due to the clustering of data centres in the area, addressing safety, noise, electromagnetic emissions, and urban heat island effects."*<br><br>The Applicant's Noise and Vibration Impact Assessment does not assess the impacts of all three data centres operating ~65 diesel generators simultaneously. This scenario is likely to occur in the event of a serious power failure, as all three data centres share a common upstream HV supply. Two of the three data centres connect to the same Macquarie Park substation.<br><br>We could not see where the cumulative effects of safety (particularly fire safety), electromagnetic emissions or urban heat island effects had been addressed by the Applicant. |
| EIS Page 91 | Operational noise and environmental impact – duration | Typically, data centres will have 24+ hours of diesel storage on site to provide continuous operation via generators in the event of a power outage, supplemented by 24/7 fuel delivery. We are concerned that the combination of all three data centres operating at full load for an extended period of time may create unacceptable noise and environmental impacts.<br><br>We are particularly concerned about the cumulative impact to sensitive receivers to the rear (education and residential) during commissioning, testing and in the event of a major power outage (which could last significantly more than a few hours).<br><br>We believe that the assumptions adopted for the duration of emergency generator use in commissioning and emergency scenarios should be reviewed, including:<br><br>1) the noise and emissions from all ~65 diesel generators operating in an emergency situation; and<br><br>2) continuous refuelling operations can safely be performed in an emergency situation on the confined site. |
| EIS Page 91 | Operational noise and environmental impact – architectural | The Applicant's noise modelling should consider the small setbacks between the three data centres and the potential for noise to reverberate from exterior cladding.<br><br>We propose that acoustic treatment is considered as part of the architectural elements (cladding and louvres for example). |

**Macquarie Data Centres Pty Ltd**

**Level 15**
**2 Market Street**
**Sydney NSW 2000**

**1800 004 943**
**macquariedatacentres.com**

**ABN 11 612 259 391**

| | | |
|---|---|---|
| EIS Page 91 | Operational noise and environmental impact – architectural | We note that the Applicant has located its backup generators to the western side of the site. This is acknowledged as a mitigating factor for potential noise, heat and air flow impacts to our neighbouring site. An example is generator exhaust from the Applicant's site discharging in close proximity to fresh air intakes, which would be a significant concern.<br><br>Should the positioning of the Applicant's generators change during the SSDA process then we reserve our rights to object to this in relation to any future amended design. |
| EIS Page 95 | Overland Flow / flood risk | At section 6.1.7.2 of the EIS the Applicant notes the potential impact of up to 300mm of flood depth to our site at 17-23 Talavera Road. However, this appears to be based on outdated assumptions as we have since obtained consent for the changes sought under SSD-24299707-Mod-1.<br><br>The Applicant should be able to now demonstrate that their modelling supports the conclusion that no flood water impacts our site. |
| EIS Page 97 | Fire Emergency Response | The Applicant has not provided for an access route/driveway to the eastern site of the site to enable access for NSW Fire and Rescue. Efficient access for emergency services is particularly important given the large volumes of diesel fuel storage, large electrical transformers and significant amounts of battery backup (likely to be Lithium Ion) that is concentrated together on Talavera Road. The Applicant's site should have emergency services access from all sides of their building to allow for quick response.<br><br>The applicant should demonstrate that the clustering of three data centres, with limited access for emergency response vehicles, does not increase risk to people and property. |
| Appendix H Landscape Plans | Talavera Rd footpath | We understand that as part of the Applicant's landscaping works, they will be required to upgrade the footpath along Talavera Rd to provide for granite paving (as has been required for neighbouring developments in accordance with Council policy).<br><br>The footpaths along Talavera Road are densely populated with fibre optic cables that have been shallowly buried by telecommunications contractors. This fibre network is highly sensitive and must not be disturbed during footpath upgrade works. It should be a condition of any consent that non-destructive digging (i.e. hydro vacuum techniques) is required in the Talavera Road footpath. |

**Macquarie Data Centres Pty Ltd**

**Level 15**
**2 Market Street**
**Sydney NSW 2000**

**1800 004 943**
**macquariedatacentres.com**

**ABN 11 612 259 391**

| | | |
|---|---|---|
| Appendix K section 6.4 page 35 | Construction Vibration – Impact on building contents | The Applicant is proposing significant excavation into the sandstone for its ground level structures. The neighbouring sites are operational data centres which house sensitive electronic equipment. The use of rock hammering and other vibration causing construction techniques should be prohibited, and a suitable vibration limit on neighbouring buildings should be agreed and monitored as a condition of any SSDA consent. |
| Other – construction site plan | Security / proximity to boundary | The SSDA documents do not provide details of how the site is proposed to be set out during construction and the subsequent fitout stages, which will continue to take place over many years. We are concerned that temporary site accommodation located close to our boundary could create a security risk, as it may provide a platform to scale our secure perimeter fences.<br><br>We request that a condition be imposed in any consent that requires consultation with neighbouring landowners over the location of temporary site facilities and access during the various construction phases, to ensure that physical risks and security risks are satisfactorily addressed. |

If you would like us to expand upon any of these items, we would be happy to provide any supplementary information that would assist. We would also be willing to meet with your team and the Applicant to discuss these items further.

Yours sincerely,

P Christensen

Paul Christensen

General Manager Design and Engineering

Macquarie Data Centres Macquarie Park Property SubTST Pty Ltd

**Macquarie Data Centres Pty Ltd**

**Level 15**
**2 Market Street**
**Sydney NSW 2000**

**1800 004 943**
**macquariedatacentres.com**

**ABN 11 612 259 391**