

29 May 2025

Shaun Williams
Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta, NSW 2124

Dear Mr Williams

**OBJECTION SUBMISSION TO STATE SIGNIFICANT DEVELOPMENT APPLICATION NO. SSD-69637456
PROPOSING EXPANSION OF EXISTING DATA CENTRE FACILITY INCLUDING TWO ADDITIONAL LEVELS
AND THE CONVERSION OF EXISTING FLOOR SPACE INTO PLANT AND ELECTRICAL SPACE, AN INCREASE
OF BUILDING HEIGHT OF 12 M AND INCREASE IN POWER CONSUMPTION OF 47.5 MW
390-422 HARRIS STREET AND 273 PYRMONT STREET, ULTIMO (LOT 1 DP 109652 AND LOT 1 DP 1189030)**

We refer to the above State Significant Development Application (SSDA) No. SSD-69637456 described by the Department of Planning, Housing and Infrastructure (the Department) as:

"Expansion of existing data centre facility including two additional levels and the conversion of existing floor space into plant and electrical space, an increase of building height of 12 m and increase in power consumption of 47.5 mw".

Milestone (AUST) Pty Limited (Milestone) acts for the 77 owners that make up Strata Plan No. 75809, located at No. 380 Harris Street, Pyrmont.

Summary of Objection

Milestone considers that the following matters raised in this submission should be considered by the Department during the assessment of this SSDA and where possible, mitigated to ensure acceptable environmental impacts to surrounding properties and the locality:

1. Acoustic Impacts.
2. Construction Impacts.
3. Fire Safety Study and Fire Safety Impacts.

On the basis of the potential significant adverse environmental impacts, we contend that the SSDA in its current form cannot be supported.

1. BACKGROUND

This submission has been prepared on behalf of the Strata Committee of No. 380 Harris Street, Pyrmont (SP 75809), which is situated directly north of the proposed development site, separated by the Western Distributor refer to **Figure 1**.

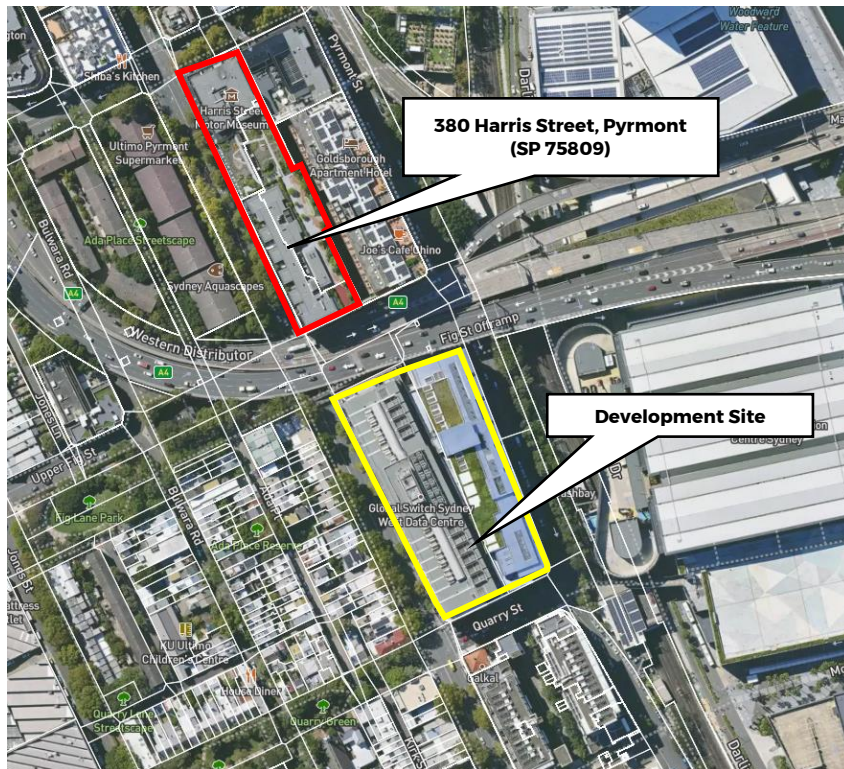


Figure 1: Site Location Map
Source: MetroMap, 2025

2. GROUNDS FOR OBJECTION

2.1. Acoustic Impacts

There are concerns relating to the potential acoustic impacts of the proposed development on the residents of No. 380 Harris Street, Pyrmont and the adequacy of the Noise and Vibration Assessment prepared by Pulse White Noise Acoustics Pty Ltd, dated 4 April 2025.

The Noise and Vibration Assessment incorrectly states that No. 380 Harris Street (referred to as R12) is a commercial property, when there are 77 residential dwellings located in the building (refer to **Figure 2**).

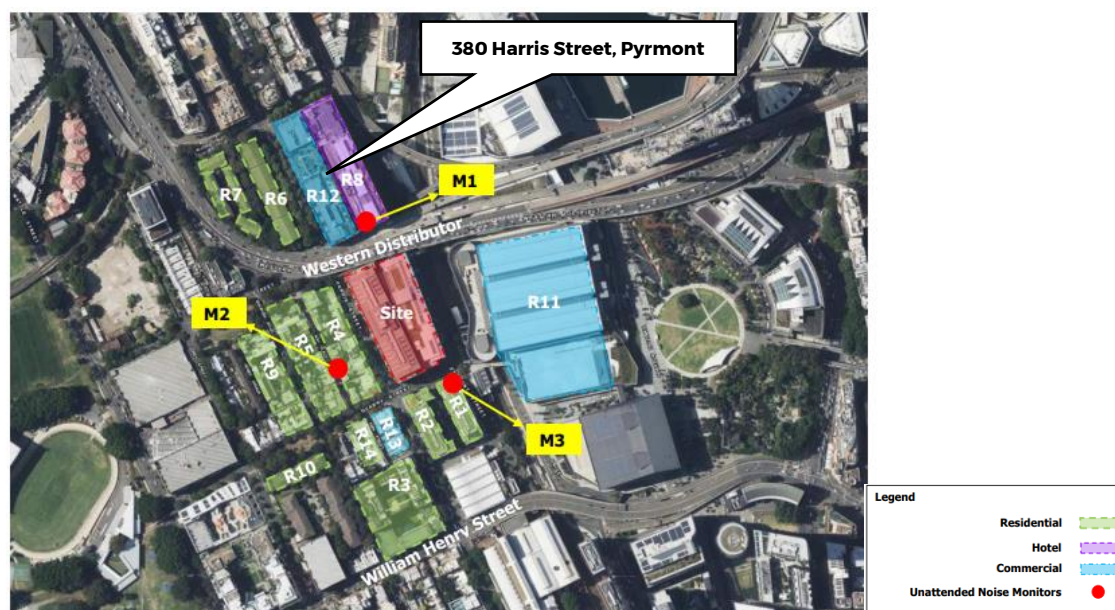


Figure 2: Noise Receiver Classification
Source: White Noise Acoustics Pty Ltd, 2025

This results in the noise criteria for No. 380 Harris Street being incorrect, and the true impacts to the residents of this building being unknown. Section 7.4 of the Noise and Vibration Assessment provides the noise modelling results, however R12, our client's site is not included in this assessment, given it was incorrectly

classified as a commercial building. On this basis, we request that the Noise and Vibration Assessment be revised to correctly identify the site, and revise the noise criteria so an informed assessment of the acoustic impacts to the subject residents, both during construction and operation phases of the development can be undertaken.

Section 10 of the Noise and Vibration Assessment requires compliance monitoring to be undertaken at selected locations prior to the issue of an Occupation Certificate for the works. We respectfully request that our client's site, No. 380 Harris Street be included as a site where compliance monitoring is undertaken, prior to the issue of an Occupation Certificate.

In addition to the inadequate information provided in the Noise and Vibration Assessment, the report states that the 66 generators for the data centre will only be used in emergencies (blackouts) and for testing as required. We request that this is endorsed as a condition of consent to ensure the generators do not run unnecessarily and result in unacceptable acoustic impacts to the surrounding locality.

2.2. Construction Impacts

Milestone has reviewed the Construction Traffic Management Plan prepared by PTC Consultants dated 4 March 2025 and while we are generally supportive of the proposed construction methodology, we have two key concerns that need to be addressed prior to the determination of the SSDA.

The proposed works zone and heavy vehicle travel path along Pymont Street are reliant on confirming the height of the Western Distributor Overpass and the Pedestrian Bridge located at No. 235 Pymont Street. Milestone considers that is critical to confirm the height of these structures prior to the determination of the SSDA to ensure that the proposed works zone and heavy vehicle travel path are able to be utilised. If heavy vehicles cannot fit under the overpass and bridge, this will require an alternative location and route and the impacts of this potential change need to be fully considered at the assessment stage of the SSDA.

In addition to this, the Construction Traffic Management Plan provides the following proposed construction hours:

- Monday to Friday: 7am – 6pm;
- Saturday: 8am – 4pm; and
- Sundays and Public Holidays: No work.

These documented hours extend beyond the hours quoted in the Noise and Vibration Assessment prepared by Pulse White Noise Acoustics Pty Ltd, dated 4 April 2025 and the Environmental Impact Statement prepared by Patch Planning dated 10 April 2025 which proposes the following construction hours:

- Monday to Friday: 7am – 6pm;
- Saturday: 8am – **1pm**; and
- Sundays and Public Holidays: No work.

For transparency, we request that the Construction Traffic Management Plan be updated to detail the construction hours noted in the Environmental Impact Statement and the Noise and Vibration Assessment.

2.3. Fire Safety Study and Fire Safety Impacts

The residents of No. 380 Harris Street have concerns relating to the potential safety impacts on nearby residents in the event of a fire. The Dangerous Goods Report prepared by Riskcon Engineering Pty Ltd dated 12 March 2025 states the following Dangerous Goods will be stored on site:

- Bulk Diesel Tanks;
- Power Transformers;
- Day Tanks (Indoor Diesel Generator Tanks); and
- Lithium-Ion Batteries.

We note in Section 4.5.1 of the Dangerous Goods Report, that a Fire Safety Study is required to be prepared in accordance with the Hazardous Industry Planning Advisory Paper No. 2 prepared by the former Department of Planning dated 2011. We request that this analysis is undertaken upfront to allow for the report to be reviewed by the community and so that the Department can confirm that the Fire Safety Study is satisfactory.

2.4. Miscellaneous Matters

The owners of SP 75809, also have a number of miscellaneous concern relating to the proposed expansion of the data centre, that they wish the Department consider in depth, including:

- Are there sufficient water and electricity services in the area to cater for the proposed development and is the Utility Services Report prepared by LCI Consultants dated 28 February 2025 sufficient?
- Is an air quality assessment required to be prepared to ensure fumes created by the diesel generators do not negatively affect neighbouring properties and locality?

3. CONCLUSION

Thank you for the opportunity to comment on SSDA No. SSD-69637456. Milestone has prepared this Objection Submission on behalf of the 77 owners of No. 380 Harris Street, Pyrmont (SP 75809), for the DigiCo Sydney Data Centre Expansion which is described by the Department as:

"Expansion of existing data centre facility including two additional levels and the conversion of existing floor space into plant and electrical space, an increase of building height of 12 m and increase in power consumption of 47.5 mw".

Milestone is of the opinion that further information is required to be prepared prior to the determination of the SSDA to ensure that the impacts of the proposal are known and can be appropriately mitigated as required, including:

- A revised Noise and Vibration Assessment which correctly characterises No. 380 Harris Street, Pyrmont as a residential development and provides a detailed assessment of the acoustic impacts to the property.
- A revised Construction Traffic Management Plan which correctly details the proposed construction hours and ensures that the heavy vehicle travel path is accessible for large vehicles taking into account the Western Distributor Overpass and the Pedestrian Bridge at No. 235 Pyrmont Street.
- A Fire Safety Study is prepared prior to the determination of the SSDA which details the safety of the proposal from a fire perspective.

We request that any additional information submitted as part of this SSDA as detailed in this submission is placed on public exhibition so that the community have an opportunity to review and comment on any amended design or additional documentation/assessment.

We would appreciate the opportunity to discuss our concerns with you and also invite the Department's Officers as part of this planning assessment process to inspect the residential apartments of No. 380 Harris Street to better understand the nature of the concerns and the proposed recommendations detailed in this submission.

If you have any queries in relation to this matter please do not hesitate to contact the undersigned.

Yours sincerely

Milestone (AUST) Pty Limited



Aidan Harrington
Associate



Lisa Bella Esposito
Director

Encl.