

Attachment 1: Department's Comments on EIS

Visual Impacts

- The Department notes the site is located adjacent to RE1 zoned land along the southern boundary. In accordance with Clause 31 of the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP), the consent authority must consider whether the development is of a high quality design, including the variety of external materials and finishes and whether high quality landscaping is provided.

The Department requires further consideration be given to the architectural design and visual appearance of the development, noting the overall bulk and scale of the proposed buildings (including building length). This should include further consideration of the potential impacts on the RE1 zoned land, visual screening options for any exposed plant and equipment on the southern façade and façade treatment options for the northern façade, such as greater variety in colour tones and textures to reduce visual impact as required by Section 4.2.5 'Architectural Design' of the Mamre Road Precinct Development Control Plan (DCP) 2021. In particular, controls 6 - 10 of Section 4.2.5 of the DCP establish design requirements for façade treatment responding to large uninterrupted building mass and responding to the public domain and visually sensitive receivers.

Project Description

- Section 3.2.7 stipulates the construction of the development is to be undertaken in three stages and is illustrated in Appendix 6 of the EIS. The Department requires further information on the timing of each construction phase and the rationale for why the development is to be constructed as proposed.
- In addition to the above, Section 3.2.7 of the EIS notes the northern-most building of the development is to be constructed first however, the LVIA provided in Appendix 8 of the EIS demonstrates the south-western portion of the development to be constructed initially. The Department requests clarification on the proposed construction staging of the development.
- Section 3.2, Table 5 of the EIS stipulates minor filling is required to establish finished floor levels of the development. The Department requests further information on the extent of filling proposed as part of the development to determine the extent of earthworks in comparison to the approved building pad level approved under SSD-9522.
- The Landscape Plans provided in Appendix 7 of the EIS identifies a Recreation Facility adjacent to the south of the western car park. The Department seeks clarification on the use of the proposed Recreation Facility.

Consideration of Alternative

- Section 3.4 of the EIS provides an options analysis for site configuration of the development. The EIS notes Option 1 was not considered viable in accommodating future infrastructure and envisaged road networks. The Department requests further clarification and justification to demonstrate why Option 1 was not viable.

Data Centre Operations

- The Department notes the development proposes to implement an evaporative cooling system for the cooling of data halls. The Department requests further information on the

processes and functions of the evaporative cooling system to demonstrate how the system works to cool the data halls.

- Furthermore, the Department requires further information on the Applicant's consideration of alternative cooling systems/methods and the costs and benefits associated with all systems/methods considered by the Applicant including the proposed evaporative cooling system.
- The Department requests further information on the operations and function of the proposed switchyard and electrical substation.

Site Access and Manoeuvrability

- The Department understands delivery and service vehicles entering the site will be required to undertake a security clearance check before accessing the main Data Centre area. The Department also notes, there is no identified gatehouse and that Security Operations Centre (SOC) are located within the main admin buildings. The Department requests additional information on the security gate screening process for vehicles including measures to prevent vehicle queuing at the security gate point.
- The Department requires further justification for the proposed access point at the eastern boundary noting this is a Collector Road identified under the MRP DCP and alternative access is available.

Air Quality

- The Air Quality Impact Assessment (AQIA) provided in Appendix 13 of the EIS has an undertaken an assessment of a worst-case performance scenario in which all back-up generators are operable due to a critical power source failure. The Department notes Table 10 of the AQIA demonstrates the operation of the development in a worst-case performance scenario would exceed the maximum 1-hour average criteria for nitrogen oxide (NO₂) by approximately 300% at all 26 assessed receivers.

The Department acknowledges the probability of a worst-case performance scenario during a critical power failure event to be highly unlikely however, the Department is concerned regarding the predicted impacts of the development on local air quality in the event a critical power failure does occur. The Department requests consideration be made for mitigation measures of NO₂ emissions where feasible and reasonable to be implemented by the development in the event of a critical power failure event.

Greenhouse Gas Emissions

- The Department notes the developments predicted greenhouse gas emissions (GHG) and energy consumption and recommends consideration is given to entering into a National Australian Built Environmental Rating System (NABERS) commitment agreement for the life of the development. The NABERS commitment agreement will provide confirmation the design and operation of the development would meet targeted annual energy efficiency ratings. Additional information on NABERS commitment agreements can be found via <https://www.nabers.gov.au/>.