

MEMORANDUM

To: [REDACTED]

From: Planning & Property Partners Pty Ltd

Date: 12 October 2026

Re: 165 Williamsons Road, South Morang

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Sustainable Data Centre Action Plan Commentary

The proposed data centre site at 165 Williamsons Road, South Morang (the Site), was identified and secured in early 2025, with an application to the Development Facilitation Program lodged in July 2025 (PA2604586). Detailed site planning and specialist input has informed the proposal, which has followed a rigorous assessment phase including engagement with various authorities to meet requirements (the Proposal).

The Sustainable Data Centre Action Plan (the Plan) was released on 22 September 2026 and Draft Planning Scheme Amendment VC324 to the *Victorian Planning Provisions* (the Amendment) was subsequently released on 5 October 2026.

The proposal has been under assessment well before the release of the Plan and the Amendment confirms that there will be transitional provisions for data centre applications lodged before 22 September 2026 (such as the Proposal). Accordingly, the Proposal is not subject to the requirements of the Plan.

Notwithstanding, the following commentary is provided to demonstrate that the Proposal is appropriate in the context of the objectives of the Plan and that the Site is a favourable location for data centre development.

4.1 Land Use, Location and Local Impact

Ref	Requirement	Detail	Commentary
Locational Controls			
L1	Residential areas	Data centres prohibited on residential zoned land and a 150 m buffer between a residential building and a proposed data centre building will be introduced and enforced via the planning system.	The proposed data centre is located on Commercial 2 Zoned land, which is intended for employment generating uses such as this facility. The site has limited sensitive interfaces owing to its position within the utility installation cluster comprising the South Morang Terminal Station (SMTS) and Melbourne Water storage facilities. The site context and surroundings provide buffer / separation as follows: <ul style="list-style-type: none">- West: the South Morang Terminal Station extends along the full site boundary to the west- North: the four-storey storage facility currently under construction at 130 Williamsons Road.- East: dominated by council owned land immediately over Findon Road which has severely limited development ability. The Melbourne Water facility sits beyond that the council owned land creating further buffer

		<p>- South: The data hall buildings are located on the northern aspect of the site with the Mernda Railway line and HV easements providing significant buffer to the south</p> <p>Interface to residential uses is limited to the north-east, beyond an extended road reserve. The Site is located within the metric buffer referenced but is located within identified Local Industrial Land under the Melbourne Industrial and Commercial Land Use Plan.</p> <p>The facility has been designed to mitigate impacts at this interface as follows:</p> <ul style="list-style-type: none"> - Sound attenuation: 12m noise barrier to the north of the facility ensures that the project meets all mandated noise limits under worst case operating scenarios, including the Environmental Reference Standard Objectives. Further, backup diesel generators will only be used as the primary power source in the event of grid outages and planned maintenance testing (further information on this aspect is provided in the noise section below) - Offsite hazard minimisation: facility design responds to hazards in a manner such that the offsite risk associated with all scenarios contemplated under the preliminary hazard analysis are acceptable <p>Other locational considerations (as described in L2) include the proximity to critical infrastructure. In this regard, the site exhibits precisely the locational characteristics encouraged by the L2 requirement: immediate proximity to major transmission infrastructure and a terminal substation.</p> <p>The site's position next to the South Morang Terminal Station including existing power infrastructure on the land provides unparalleled proximity and servicing from infrastructure critical to data centre operation (SMTS is a key Victorian terminal station across 4 voltage levels).</p> <p>SMTS was identified by the relevant Victorian Transmission System Operator (Ausnet) as an optimal Victorian transmission connection location for future data centres in recent assessment.</p> <p>This means:</p> <ul style="list-style-type: none"> - No significant network augmentation required (i.e. the capacity is available now without extensive and expensive network capital expenditure) - Transmission connection from SMTS boundary directly to the site with no disruptive distribution requirements. E.g. no
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			<p>requirement to replace / enlarge local distribution power poles</p> <p>Conclusion: The relevant buffer metric referenced in the Plan does not apply to the Proposal and any potential impacts to the North-East have been mitigated through the particular design and treatments. The site context is such that significant buffers exist in all other directions and the position of the Site within an existing utility cluster (including Melbourne Water) and directly adjacent to the South Morang Terminal Station address the key expectation that data centres should be located where there is robust access to power, water and telecommunications capacity.</p>
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L2	Rural areas	<p>Prohibited in rural zones unless located near and able to be serviced by infrastructure critical to data centre operation – major transmission infrastructure, substations, renewable energy facilities, battery energy storage systems or recycled water infrastructure.</p>	<p>The site is not within a rural zone – however, as described in the commentary to L1, above, the Site exhibits precisely the locational characteristics encouraged by the L2 requirement: immediate proximity and access to major transmission infrastructure and a terminal substation without the need for augmentation.</p> <p>Conclusion: Not strictly applicable, however the proximity to key infrastructure is consistent with the locational expectations in relation to key servicing infrastructure.</p>
L3	Statewide planning policy	<p>A statewide planning policy will guide location, design, scale and infrastructure requirements. Detailed siting, design and built-form guidance to be developed with stakeholder input in 2027.</p>	<p>The Proposal is assessed against the current policy of the day and which determines the appropriate location, design and scale of the facility.</p> <p>The statewide planning policy is not expected to be gazetted until 2027 and detailed guidance is yet to be developed, however the following characteristics of the project are expected to be well aligned with the ultimate form of this policy:</p> <ul style="list-style-type: none"> - Commercial zoning - Direct terminal station adjacency - Transmission network access - Consolidated plant - Acoustic screening - Landscaping - Servicing - Minimisation of off-site amenity impacts. <p>Conclusion: The Proposal responds to all relevant and current planning policy as further described in the town planning report submitted with the application documents.</p>

Traffic Controls		
Planning Permit First	Development must first meet local planning approval requirements.	The application is currently being assessed for the grant of a planning permit and no works have been carried out to date.
Road Reserve Access Consent	Developers must obtain official consent to work within public road corridors. Applications undergo a 20-day statutory assessment by DTP.	Findon Road and Williamsons Road are Council managed roads and necessary approvals would be sought as required following the grant of a planning permit.
Traffic Management Plan (Memorandum of Authorisation)	An accredited traffic management company must submit a site-specific traffic plan.	These matters can be addressed at the time of construction where necessary.
Regulatory Sign-Off	DTP reviews and authorises traffic control devices strictly against the AGTTM and Victorian Code of Practice.	These matters can be addressed at the time of construction where necessary.
Planning Assessment and Notification Framework		
Responsible Authority	The Minister for Planning serves as the responsible authority for data centre applications progressed through the DFP. All other applications remain under the jurisdiction of the relevant municipal council.	The approval is sought through the Minister for Planning.
Expanded Referrals	Victoria Planning Provisions will be formally amended to extend referral status for WorkSafe Victoria, Fire Rescue Victoria, VicGrid and the relevant water corporation to all data centre applications, including those determined by local councils. The EPA already holds statutory referral status.	<p>Engagement has been undertaken with the following authorities and stakeholders:</p> <ul style="list-style-type: none"> - The Department of Transport and Planning - The Department of Energy, Environment and Climate Action - Environment Protection Authority Victoria - WorkSafe - Whittlesea City Council - AusNet - Fire Rescue Victoria <p>Statutory referrals have been issued associated with the application and requirements set to form part of the approval.</p>

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	<p style="color: red; text-align: center;">This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright</p>	<p>The proponent has engaged extensively with VicGrid in progressing the grid connection for the project. Through this engagement the proponent has received all relevant technical deliverables from VicGrid, including:</p> <ul style="list-style-type: none"> - Location-specific system strength information and fault levels - Model and performance standard requirements, including harmonic and flicker allocations for the project - Draft primary and protection functional requirements (PFR/PCR) for the South Morang Terminal Station (SMTS) works <p>The proponent is currently completing grid modelling studies as part of the VicGrid application process.</p> <p>Development of the high voltage infrastructure (HV Infra) solution for the project has involved significant engagement with Ausnet as the incumbent Declared Transmission System Operator (DTSO) for non-contestable works and as the preferred DTSO for contestable works. This engagement has culminated in a HV Infra solution that:</p> <ul style="list-style-type: none"> - Utilises two bays in the SMTS for 220kV feeders to be delivered by Ausnet Transmission Group Pty Ltd (non-contestable scope of work) - Provides for two underground 220kV cables from SMTS to the site, to be delivered by Ausnet Development and Future Networks (contestable scope of work). This cable route is a transmission level connection directly from the SMTS to the Site, it does not involve any public land (i.e. there is no disruptive distribution level power line upgrades required) <p>Engagement has been undertaken with Yarra Valley Water (YVW) and Melbourne Water in relation to developing a water solution for the project that is aligned to the YVW demand management objectives, including considerations around peak hour load shedding on peak network days. Further, the water system for the project uses a flexible design to enable the future integration of recycled water when supply and connection are made available</p>
<p>Public Consultation and Visibility</p>	<p>Proponents must ensure comprehensive community notification. Immediate neighbours must be formally notified, detailed</p>	<p>The proponent has implemented a multi-channel engagement approach with key stakeholders including the local community, the City of Whittlesea, the Victorian Government and the media. Key outcomes to date in the context of the local community include:</p>

	<p>application documentation published online, and prominent signage displayed on the proposed site.</p>	<ul style="list-style-type: none"> - Website uplift delivered in July 2026, comprising a dedicated Project related resource page and enabling inquiries to be made to info@doverdc.com.au - Community Communications: letterbox drop to surrounding residents on 9 September 2026 with an offer of follow up meetings with the Project Team, consistent written responses to resident enquiries made via the Project related webpage - Community / Advocacy Group meeting: Project team meeting with the South Morang Data Centre Advocacy Group in September 2026 - Media: enquiries (including from Herald Sun, ABC News, W.Media, The Urban Developer) handled through a single spokesperson with consistent approach and information <p>Statutory public notice is being carried out pursuant to s52 of the <i>Planning and Environment Act 1987</i> (Vic) including notices installed on the site and with notice to surrounding properties. Material is publicly available on the DTP website for review.</p>
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Noise, Back-up Generation, Fire/Electrical Safety and Construction

L4	Noise	<p>Statewide industrial/commercial noise limits apply; night-time limit of 55 dB(A) anywhere in Victoria; a penalty applies for tonal noise; where several premises affect the same location they are assessed cumulatively; no equipment is exempt.</p>	<p>The project is subject to the existing Victorian industrial/commercial noise control regime and has been designed to meet all mandated noise and amenity limits.</p> <p>Specialist acoustic engineers have modelled the Proposal's operational noise based on a deliberately worst-case scenario and confirmed compliance with the limits set by the EPA including the more onerous Environmental Reference Standard (ERS) objective. Importantly, the site-specific night criteria are substantially more stringent than the Plan's reference to 55 dBA. This specialist acoustic report predicts compliance with the Noise Protocol and ERS objectives for 24 hour typical operation and maintenance, as well as compliance with the General Environmental Duty (GED).</p> <p>The design includes substantial acoustic barriers, plant attenuation, enclosure and commissioning verification.</p> <p>Conclusion: The Proposal complies with the relevant legislation as detailed within the Noise Impact Assessment submitted with the application documents.</p>
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L5	Air quality and Emissions	Proponents must restrict backup diesel generation to emergencies and mandatory testing, deploy best-available technology (such as US EPA Tier 4 equivalent generators), continuously monitor and report runtime/emissions, and mitigate residual greenhouse gas/air-quality impacts through appropriate crediting or localised equivalent management.	<p>Backup diesel generators will only be used as the primary power source in the event of grid outages.</p> <p>Backup generator testing will only be conducted during daytime hours (as relevantly defined by Environment Protection Authority Victoria) and testing protocols will limit the number of generators being tested simultaneously.</p> <p>The operation of backup generators will be managed in accordance with all applicable requirements, including in relation to noise and emissions.</p> <p>The backup generators have also been designed to use Hydrotreated Vegetable Oil (HVO), which can reduce emissions compared with conventional diesel when sustainably sourced.</p> <p>Conclusion: The Proposal meets the L5 requirements, and engagement with EPA around air emissions is ongoing. Detailed air emissions assessment to be submitted to the EPA as part of the Development Licence application.</p>
L6	Fire and electrical safety	Energy Safe Victoria, WorkSafe Victoria, Fire Rescue Victoria and the CFA coordinate regulatory input on electrical, workplace, dangerous goods and fire safety.	<p>Through the Development Facilitation Program framework the proponent has had considerable engagement with WorkSafe and Fire Rescue Victoria. This engagement informed the completion of the following specialist materials:</p> <ul style="list-style-type: none"> - Preliminary Hazard Assessment by a specialist fire safety and risk engineering consultant that concludes any potential offsite risk associated with all scenarios contemplated under the preliminary hazard analysis are acceptable - Fire Safety Study (including initial fire safety strategy) prepared by a specialist fire safety engineering consultant <p>Conclusion: All required inputs have been addressed within the Preliminary Hazard Assessment and Emergency Response Plan from Red Fire Engineers submitted with the application documents.</p>
L7	Construction and local amenity	Proponents are expected to engage early with VicRoads,	A detailed Construction Management Plan will be prepared prior to works commencing and is anticipated to be a condition of a planning permit.

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	telecommunications and fibre providers to coordinate traffic management and infrastructure requirements, including shared underground conduits where possible.	<p>Further, a number of construction controls are referenced in the current application documents, such as:</p> <ul style="list-style-type: none"> - Construction works to comply with EPA construction noise requirements and standard construction hours - A Construction Environmental Management Plan requirement covering stockpile locations, wash-down areas, erosion and sediment control, weed hygiene protocols and designated no-go zones, to be read and signed by every person working on site - Tree protection fencing and signed exclusion zones installed before any construction activity begins and maintained until completion, with no vehicle movement, material storage, stockpiling or refuelling permitted inside them <p>Conclusion: All requirements addressed in subsequent management plans.</p>
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Community, First Peoples and Environment		
Proactive Engagement	Proponents must actively engage with local communities, First Peoples, and host municipal councils both prior to and throughout the approval process.	<p>The proponent has implemented a multi-channel engagement approach with key stakeholders including the local community and the City of Whittlesea.</p> <p>Key relevant outcomes to date:</p> <ul style="list-style-type: none"> - Website uplift delivered in July 2026, comprising a dedicated Project related resource page and enabling inquiries to be made to info@doverdc.com.au - Council: formal meetings with City of Whittlesea officers, with minuted actions on community outreach, the website and planning documents - Community Communications: letterbox drop to surrounding residents on 9 September 2026 with an offer of follow up meetings with the Project Team, consistent written responses to resident enquiries made via the Project related webpage - Community / Advocacy Group meeting: Project team meeting with the South Morang Data Centre Advocacy Group in September 2026
Aboriginal Cultural Heritage	Statutory cultural heritage protections apply. Where a proposal involves a high-impact activity within an area of cultural heritage	An approved Cultural Heritage Management Plan exists for the Site and has been provided with the application documents.

	sensitivity, a Cultural Heritage Management Plan must be prepared and approved by the relevant Registered Aboriginal Party.	
General Environmental Duty	The General Environmental Duty under the Environment Protection Act 2017 binds every facility operator, with no minimum threshold. Proponents are expected to proactively identify and minimise adverse environmental impacts.	<p>The proposed data centre is designed to ensure compliance with the General Environmental Duty and through it's supporting inputs. Relevant permissions including a Development Licence will be sought through the EPA.</p> <p>For further discussion see the Noise Impact Assessment from ADP submitted with the application documents.</p>
Environmental Sustainability and Landscaping	Updates to the Victorian State Planning Policy framework will enable planning permit applications to be assessed against environmental sustainability – including trees, water sensitive urban design, landscaping and visual bulk.	<p>The Proposal is supported by a Sustainability Management Plan prepared with a specialist environmental solutions consultant, a Stormwater Management Plan prepared with a specialist engineering consultancy and a detailed landscape plan prepared with specialist landscape designers.</p> <p>The proposal also includes water sensitive urban design (WSUD) measures within the car park, landscaping and passive irrigation, and the planting of several new trees both on the site and adjacent road reserve, where agreeable to Council.</p> <p>See the Sustainability Management Plan and Stormwater Management Plan submitted with the application documents.</p>
Local Investment Guarantee		
Local Investment Guarantee	Victoria will work with local government, industry and local communities to establish a Local Investment Guarantee. Investments that must be considered include local employment, skills development, training partnerships, engagement with First Nations communities, local procurement, and measures to improve local areas.	<p>The Guarantee has not yet been fully developed. However, the proponent has been engaging with the local community in relation to potential jobs associated with the project via the contact function on the dedicated project website</p> <div style="border: 2px solid red; padding: 10px; margin-top: 10px;"> <p>This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright</p> </div>

4.2 New Energy Supply and Grid Readiness

Ref	Requirement	Detail	Proponent Response
Energy Requirements			
E1	Bring your own supply	Offset actual operational electricity use by investing in new renewable energy generation and storage. Detailed compliance, verification and firming requirements to be finalised in step with Commonwealth standards.	<p>The proponent is committed to sustainability and responsible resource use.</p> <p>This commitment is evident in significant pre-application work undertaken in consultation with multiple government departments and agencies to ensure the project meets – and, where possible exceeds – applicable national and state policies and standards, including in respect of power.</p> <p>In this context, the proponent has recently advanced discussions with a leading Australian clean energy company regarding a zero-emissions energy partnership for the project. Under such an agreement, the project's energy needs would be met via long-term clean energy power purchase agreements (PPAs). We have also engaged with renewable energy developers and other potential additional firm power sources in relation to PPAs.</p> <p>The proponent's commitment to minimising the Proposal's footprint in terms of electricity use is also evident in a project design that represents best-practice power usage effectiveness targets.</p> <p>Importantly, the Site is directly adjacent to the SMTS which has been identified by the grid as an optimal location for large loads, meaning usage impacts on other electricity users are minimised.</p> <p>This location also removes the need for new transmission lines and larger power poles in surrounding streets.</p> <p>Conclusion: The Proposal meets the requirements and the proponent will continue to work to progress PPA solutions for the project that may be utilised in conjunction with any PPA portfolios provided by the project's customers. Detailed compliance, verification and firming requirements will be finalised in step with the applicable Commonwealth requirements.</p>
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E2	Meet connection costs	Cover all connection costs and network augmentations required as a direct result of new investment, including necessary upstream augmentations.	<p>Development of the high voltage infrastructure (HV Infra) solution for the project has involved significant engagement with Ausnet as the incumbent Declared Transmission System Operator (DTSO) for non-contestable works and as the preferred DTSO for contestable works. This engagement has culminated in a HV Infra solution that:</p> <ul style="list-style-type: none"> - Utilises two bays in the SMTS for 220kV feeders to be delivered by Ausnet Transmission Group Pty Ltd (non-contestable scope of work)

			<ul style="list-style-type: none"> - Provides for two underground 220kV cables from SMTS to the site, to be delivered by Ausnet Development and Future Networks (contestable scope of work). This cable route is a transmission level connection directly from the SMTS to the site, it does not involve any public land (i.e. there is no disruptive distribution level power line upgrades required) <p>The HV Infra solution will be delivered by Ausnet (non-contestable and contestable, separately) under a Design Build Operate Maintain contract under which the proponent will pay for the project costs via and annuity over the life of the contract.</p> <p>Conclusion: The Proposal meets the requirements, and arrangements will be finalised with Ausnet and VicGrid as part of the definitive connection agreements.</p>
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E3	Maintain system security	Participate in demand flexibility services to the maximum extent commercially and technically possible.	<p>To be considered to the extent commercially and technically possible.</p> <p>Conclusion: The proponent will participate in demand flexibility services as required by VicGrid to ensure stable and secure operation of the electricity network.</p>
E4	Deliver efficient performance	Achieve high levels of power usage effectiveness (PUE), designed to industry best-practice targets and measured to recognised national standards.	<p>The proponent is committed to sustainability and responsible resource use.</p> <p>This commitment is evident in the project design which is consistent with best-practice power usage effectiveness (PUE) targets to ensure responsible use of power. As part of early design, a PUE of 1.2 has been targeted.</p> <p>Conclusion: Best-practice PUE employed and to be finalised as design develops</p>
E5	Support the transition	Meet these Requirements while contributing positively to Victoria's legislated emissions reduction and renewable energy targets.	<p>See responses to E1 and L5, above.</p> <p>Conclusion: Requirements met.</p>
Implementation Actions (Energy)			
Deliver national settings		Through the Energy and Climate Change Ministerial Council, work with the Commonwealth and	Note.

	other jurisdictions on policy settings requiring data centres to offset electricity demand through additional renewable generation.	
Strengthen reporting	The Commonwealth will introduce legislation to strengthen reporting under the National Greenhouse and Energy Reporting scheme.	Note.
Develop Victorian settings and approvals	VicGrid will become a referral authority through the planning process.	<p>The proponent has engaged extensively with VicGrid in progressing the grid connection for the project. Through this engagement the proponent has received all relevant technical deliverables from VicGrid, including:</p> <ul style="list-style-type: none"> - Location-specific system strength information and fault levels - Model and performance standard requirements, including harmonic and flicker allocations for the project - Draft primary and protection functional requirements (PFR/PCR) for the South Morang Terminal Station (SMTS) works. <p>The Proponent is currently completing grid modelling studies as part of the VicGrid application process.</p>
Renewable energy industrial precincts	Scope pathways for data centres to co-locate with complementary industries.	<p>The Site is located within a utility installation cluster comprising the South Morang Terminal Station (SMTS) and Melbourne Water storage facilities and with power infrastructure existing on the land. On this basis the site is co-located with complementary industries in the form of major electrical transmission infrastructure and water supply facilities.</p> <p>The Site's position next to the South Morang Terminal Station provides unparalleled proximity and servicing from infrastructure critical to data centre operation (SMTS is a key Victorian terminal station across 4 voltage levels).</p> <p>SMTS was identified by the Victorian incumbent Transmission System Operator (Ausnet) as an optimal Victorian transmission connection location for future data centres in recent assessment.</p> <p>This means:</p> <ul style="list-style-type: none"> - No significant network augmentation required (i.e. the capacity is available now without extensive and expensive network capital expenditure)

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		<ul style="list-style-type: none"> - Transmission connection from SMTS boundary directly to the site with no disruptive distribution requirements. E.g. no requirement to replace / enlarge local distribution power poles <p>Nearby access to significant water storage assets is also highly complementary to data centre operation and minimising impacts on local amenity (through limited connection augmentation requirements)</p>
Support green power procurement	Develop best-practice guidelines for sustainable outcomes through green power procurement.	<p>The proponent is committed to sustainability and responsible resource use.</p> <p>This commitment is evident in significant pre-application work undertaken in consultation with multiple government departments and agencies to ensure the project meets – and, where possible exceeds – applicable national and state policies and standards, including in respect of power.</p> <p>In this context, the proponent has recently advanced discussions with a leading Australian clean energy company regarding a zero-emissions energy partnership for the project. Under such an agreement, the project's energy needs would be met via long-term clean energy power purchase agreements (PPAs). The proponent has also engaged with renewable energy developers and other potential additional firm power sources in relation to PPAs. Both these potential solutions will be further developed with a view to augmenting any PPA portfolio provided by the ultimate customer.</p> <p>This commitment to responsible resource use is also evident in a project design that represents best-practice power usage efficiency targets.</p>
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Promote infrastructure upgrades	Provide regular updates on the status of network infrastructure projects.	The status of any relevant network infrastructure projects will be incorporated into the communications plan for the Proposal as required.

4.3 Protecting Drinking Water and Securing Supply

Ref	Requirement	Detail	Proponent Response
Water Requirements			
W1	Use recycled/non-drinking water for cooling	Facilities using water-intensive cooling are expected to meet cooling needs from recycled or other non-drinking sources or hold an agreement with their water corporation to	<p>The Proposal's water strategy has been developed in consultation with Yarra Valley Water (YVW) and is aligned to the YVW demand management objectives, including considerations around peak hour load shedding on peak network demand days.</p> <p>The proponent intends to transition to recycled / non-potable water when they become available and the project's design is flexible to enable the future integration of recycled water. Discussions have been</p>

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		transition when available.	<p>progressing with YVW in this regard, including in relation to the planned upgrade to the recycled water treatment plant in Wollert.</p> <p>Conclusion: The Proposal meets the requirements and detailed arrangements will be finalised in the context of the relevant YVW and Melbourne Water requirements in the definitive documentation.</p>
W2	Replace what you use	Where recycled or non-drinking water is not yet available, agree a plan with the water corporation to offset interim drinking water use.	<p>The proponent is open to considering interim offsets as required to finalise the project's water strategy in the context of the engagement with YVW.</p> <p>Conclusion: Detailed arrangements will be finalised in the context of the relevant YVW and Melbourne Water requirements in the definitive documentation.</p>
W3	Design for drought	Facilities relying on drinking water as an interim measure must be designed so water use can be reduced when restrictions are imposed.	<p>The Proposal's water strategy has been developed in consultation with Yarra Valley Water (YVW) and is aligned to the YVW demand management objectives, including considerations around peak hour load shedding on peak network demand days.</p> <p>Conclusion: Detailed arrangements will be finalised in the context of the relevant YVW and Melbourne Water requirements in the definitive documentation.</p>
W4	Be efficient, measure it, report it	Design to dWUE ≤ 1.0 (potable) or ≤ 1.6 (non-potable), otherwise agreed with the water corporation. Measured in line with ISO/IEC 30134-9:2022. Standards reviewed and updated annually. Publicly report water use.	<p>The Proposal's design is based on a best practice water usage strategy that targets WUE ≤ 1.0 L/kWh. The proponent is open to considering additional measurement and reporting standards as required to finalise the project's water strategy in the context of the engagement with YVW</p> <p>Conclusion: Detailed arrangements will be finalised in the context of the relevant YVW and Melbourne Water requirements in the definitive documentation.</p>
W5	Pay for infrastructure	Meet the full cost of water infrastructure required to service the connection; contribute where demand brings forward augmentation.	<p>The Proposal's water strategy has been developed in consultation with Yarra Valley Water (YVW) and is aligned to the YVW demand management objectives, including considerations around peak hour load shedding on peak network demand days.</p> <p>The proponent plans on accommodating the cost of the infrastructure as required to finalise the project's water strategy in the context of the engagement with YVW.</p>

			<p>Conclusion: Detailed arrangements will be finalised in the context of the relevant YVW and Melbourne Water requirements in the definitive documentation.</p>
W6	Support national standards	Align with mandatory minimum water-use standards being developed by the Australian Government.	<p>The Proposal's water strategy has been developed in consultation with Yarra Valley Water (YVW) and is aligned to the YVW demand management objectives, including considerations around peak hour load shedding on peak network demand days.</p> <p>The proponent will align with mandatory minimum water use standards being adopted by the Australian Government as required as part of finalising the project's water strategy in the context of the engagement with YVW.</p> <p>Conclusion: Detailed arrangements will be finalised in the context of the relevant YVW and Melbourne Water requirements in the definitive documentation.</p>
Existing Protections (Water)			
Statutory Safeguards	Under the Water Act 1989, publicly owned water corporations hold the explicit authority to refuse a connection or apply strict conditions.	Note.	<p>This copied document to be made available for the sole purpose of enabling its consideration and review as part of a planning process under the Planning and Environment Act 1987. The document must not be used for any purpose which may breach any copyright</p>
Infrastructure Cost Recovery	The New Customer Contributions Framework mandates that proponents fully fund any dedicated infrastructure upgrades.	Note.	
Sustainable Cooling Alternatives	Victoria is well positioned to mandate non-potable alternatives, with Melbourne Water producing the largest volume of Class A recycled water in Australia.	Note.	
Proven Commercial Viability	The Melton Recycled Water Plant supplies the Amazon Web Services data centre – the state's first direct recycled water connection.	Note.	

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Implementation Actions (Water)		
Clearer guidance for industry	Published the Industry Water Connection Guide.	Note.
Clearer guidance for water corporations	Updated Urban Water Strategy Guidance.	Note.
Standardised engagement tools	A data centre-specific template for water corporations.	Note.
Early facilitation and advice	Engage with major data centre investors early.	Note.
Better leverage recycled water infrastructure	Identify areas of water infrastructure constraint and opportunities.	Note.
Collaborative water preservation	Work with water corporations and the sector.	Note.
Transparent cost recovery	Clarify the user-pays principle.	Note.
Facility-level water reporting	Align Victoria's reporting with the national principle.	Note.

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4.4 Victorian Jobs, Skills and Local Benefit

Ref	Requirement	Detail	Proponent Response
Jobs and Skills Requirements			
J1	Train Victorians	Support training of construction and operational workers through apprenticeships and traineeships, TAFE and tertiary partnerships, or bursaries and scholarships connected to real employment.	The proponent is exploring local partnership opportunities, including with respect to local businesses and education organisations. As the Proposal's community program develops, the proponent will look to support skills development through apprenticeships, traineeships and other pathways connected to real employment on the project, alongside initiatives that contribute to the long-term wellbeing of the local community.
J2	Buy Victorian	Prioritise Victorian content and local suppliers; engage with government on opportunities to	The proponent has expressed a desire to prioritise Victorian content and local suppliers and has begun engaging with the local community in relation to potential opportunities associated with the project (including via the contact function on the dedicated

		support local supply chains.	project website). The proponent has also had extensive engagement with Invest Victoria and anticipates engaging further in relation to supporting local supply chains as the project progresses.
J3	Work with the workforce	Coordinate with industry, government and unions so skills development keeps pace with demand and benefits are shared across the economy.	As described above, the proponent is exploring local partnership opportunities, including with respect to local businesses and education organisations. The proponent has also had extensive engagement with Invest Victoria and anticipates engaging further around strategies to ensure that skills development keeps pace and benefits are shared across the economy.
J4	Hire where you build	Where a facility is in regional Victoria or a community with high unemployment, work with local training providers and employment services.	The facility is not in regional Victoria, however the sections above describe the proponent's approach with respect to the local community in this regard.
Implementation Actions (Jobs)			
Targeted workforce strategy	Identify current and future skill demands and develop associated training pathways.	Note.	
Industry-specific courses	Design and tailor pilot coursework with industry through the Skills Solutions Partnership.	Note.	
Qualified workforce pipeline	Co-design and deliver programs with TAFE and Apprenticeships Victoria.	Note.	
Open the door to the next generation	Promote data centre careers to young people and career changers.	Note.	
Connect workers to employers	Facilitate connections between developers/operators, universities, vocational training centres, TAFE and Apprenticeships Victoria.	Note.	

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Prepare for national training conditions	Engage with the Commonwealth as it develops AI training conditions ahead of legislation in 2027.	Note.
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