



Memo

To	
From	
Date	
Subject	Spotswood Review Sustainable Data Centre Action Plan

The Sustainable Data Centre Action Plan (The Plan) was released on 22 September 2026, providing a new set of regulations that will guide future development of Data Centres in the State. Amendment VC324 to the *Victorian Planning Provisions* and all planning schemes was subsequently released on 5 October 2026, with the Minister for Planning issuing notice of the amendment to municipal councils.

This Memo provides an assessment against the guidelines as they relate to the proposed Data Centre at 44-76 Simcock Avenue Spotswood (PA2604553) to reinforce the suitability of the site to be developed as a Data Centre.

VC324 Amendment documentation confirms that there will be transitional provisions for data centre applications lodged before 22 September 2026:

Notwithstanding, we maintain that the proposal responds appropriately to new guidelines and the proposed land use is supported in strategic planning policy as well as appropriate in the context of the surrounding interfaces.

The tables below provide an assessment against the released guidelines and how the proposal responds accordingly.

1 Clear Requirements and Transparent Assistance

The Plan provides a number of recommendations for reform in the process, summarised below:

- *Single point of contact*
- *Information before a site is chosen*
- *Coordinated regulator input*
- *Information about the network*
- *Escalation when things stall*
- *Rules that hold still*

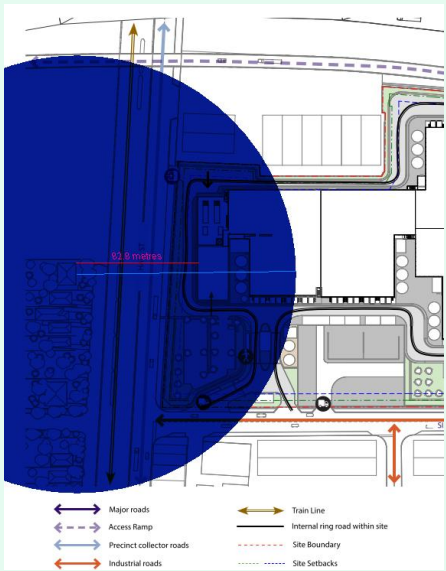
Urbis notes the above objectives are reasonable and will be helpful for the coordination of approvals and referrals required for data centre projects.

2 Enablers And Requirements

2.1 Land Use, Location and Local Impact

New Land use definition proposed:

“Land used to collect, distribute, process, or store digital data. It does not include collecting, distributing, processing, or storing digital data if it is ancillary to another use of the land.”

Ref	Requirement	Detail	Purpose	Urbis comments
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.	Separates facilities from homes and sensitive uses.	Would not comply The existing proposal would not comply with this provision if the new regulations were to apply to the proposal, given that the closest residential building is approximately 83 metres west of the proposed Data Centre building. The image below is an excerpt of the site plan of the proposed data centre and has been marked up to show the distance from the closest dwelling to the proposed building (83m) and the catchment area of the required distance (approx. 150m).  Despite not meeting this requirement, we consider that the proposed land use is highly appropriate due to extenuating circumstances pertaining to the site context as outlined below:

Ref	Requirement	Detail	Purpose	Urbis comments
				▪ The site is located within a state significant industrial precinct that has a number of major hazard facilities in the immediate environment. The proposed data centre is consistent with the established and intended industrial function of the precinct. ▪ The site is an ex-Mobil site that was highly contaminated and subsequently remediated. Therefore, the site can only be developed for industrial or commercial purposes and needs to be carefully managed. This is in accordance with what is proposed. ▪ The site benefits from an existing permit for warehouses which has been amended via section 72 to allow the early works associated with the current proposal. ▪ The Draft Hobsons Bay Industrial Land Management Strategy 2023-2038 identifies digital enterprise as a priority emerging industry sector for Hobsons Bay. It identifies Spotswood as one of the key precincts capable of accommodating digital industries and expressly identifies data centres as an appropriate future land use within the precinct. ▪ The site is physically separated from the nearest residential properties by the railway corridor and transport infrastructure; Spotswood station is also in the late stages of planning for the LEVEL crossing removal which seeks to elevate the rail line, further separating the residential properties and the proposed data centre. ▪ The operational components of the development are largely enclosed within the building envelope, enabling potential amenity impacts to be effectively managed through building design, plant selection, acoustic treatment and operational controls. ▪ Given the location of the site next to the West Gate Freeway and existing

Ref	Requirement	Detail	Purpose	Urbis comments
				industrial environment, noise impacts have been assessed and are not expected to generate additional high-intensity noises. Light spill from the development has been assessed as being of negligible impact and can be adequately controlled through the proposed design.
L2	Rural areas	Prohibited in rural zones unless located near and able to be serviced by infrastructure critical to data centre operation, including major transmission infrastructure, substations, renewable energy facilities, BESS or recycled water infrastructure.	Directs investment to places where servicing infrastructure exists and keeps it away from productive agricultural land.	Compliant The site is located in a state-significant industrial area, this guideline is not relevant to the Spotswood proposal.
L3	Statewide planning policy	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.	Gives applicants, communities and decision-makers greater certainty while encouraging efficient use of energy and water resources.	Compliant The proposal responds to all relevant and current policy as outlined in the planning report submitted with the application documents. Of note is The Draft Hobsons Bay Industrial Land Management Strategy 2023–2038 which identifies digital enterprise as a priority emerging industry sector for Hobsons Bay. It identifies Spotswood as one of the key precincts capable of accommodating digital industries and expressly identifies data centres as an appropriate future land use within the precinct.

Planning assessment and notification framework

Responsible Authority: The Minister for Planning serves as responsible authority for applications progressed through the Development Facilitation Program. All other applications remain with the relevant municipal council.

Urbis comments: **Noted, no impact.**

Expanded Referrals: The Victoria Planning Provisions will be amended to extend referral status for WorkSafe Victoria, Fire Rescue Victoria, VicGrid and the relevant water corporation to all data centre applications.

Urbis comments: **Noted, no impact.** The proposal has already been referred to the listed referral agencies, and consultation is ongoing to resolve any outstanding items.

Public Consultation and Visibility: Immediate neighbours must be notified, application documentation published online, and signage displayed on the proposed site. Large data centres will have consultation through planning notice requirements and the EPA Development Licence process.

Urbis comments: GreenSquare DC have commissioned extensive consultation with the community and key stakeholders, over and above the requirement of the planning scheme. The below engagement has been undertaken at the discretion of the project team:

- **Project newsletter** delivered to approximately 600 properties
- **Project web page** established providing project information, FAQs and a contact form
- **Two (2) community drop-in sessions:**
 - *Wednesday, 29 July at Spotswood Football Club*
 - *Saturday, 1 August at Spotswood Kingsville RSL*
- **Thirteen (13) introductory emails sent** to elected officials, local community groups and adjacent businesses, sharing information about the proposal and inviting recipients to participate in briefings.
- **Seven (7) briefings delivered** to elected officials and local community groups and organisations
- **More than 30 ideas** for potential community benefit sharing activities

Noise, back-up generation, fire/electrical safety and construction

Ref	Requirement	Detail	Purpose	Urbis comments
L4	Noise	Statewide industrial/commercial noise limits apply; night-time limit of 55 dB(A); tonal noise penalty; cumulative assessment where several premises affect the same location; no equipment is exempt.	Protects amenity for nearby sensitive receivers.	Complies Aurecon have prepared an Acoustic Report to support the Planning Application and have undertaken further detailed modelling to be provided as part of the Development License Application. Tonal noise and cumulative noise assessments are conducted as per the Technical Guide (EPA 1997) and the appropriate adjustments are applied to outline the maximum project noise limits established in accordance with the Noise Protocol (EPA 1826.5). The Noise Impact Assessment assesses typical and

				emergency testing operations against the Noise Protocol defined noise limits
L5	Air quality and emissions	Restrict backup diesel generation to emergencies and mandatory testing, deploy best-available technology, continuously monitor and report runtime/emissions, and mitigate residual impacts.	Protects local air quality and public health while accounting for greenhouse gas impacts.	Complies Back-up diesel generator use will be limited to emergency scenarios and required testing and maintenance activities. An air emissions assessment is being prepared by SLR/Aurecon in accordance with EPA standards, including EPA Publication 1961 and EPAs Technical Information Requirements for Data Centres to assess potential impacts associated with emissions to air for generator use. As part of early design, measures have been incorporated to minimise risks associated with air emissions. This includes positioning exhaust stacks away from sensitive receptors where feasible, and contingency measures to maintain grid power. Selected generators are the Cummins C2750D5BE, which meets EPA Tier 2 emissions standards, designed to enhance air quality and reduce particulate matter to provide significant environmental benefits. Consideration has been given to Tier 4 generators fitted with Selective Catalytic Reduction (SCR)s. However, to be effective SCRs require the exhaust to reach optimum operating temperatures (which may take up to 20 mins), which are generally not seen as feasible based on proposed operating scenarios which are generally limited to maintenance startup tests lasting less than 20mins.

				Further mitigations will be implemented as a result of the Air Quality Impact Assessment, this is likely to include a reduction in generator testing times, and increased stack heights. The Air Quality Impact Assessment will be submitted to EPA as part of the Development Licence application. "
L6	Fire and electrical safety	Energy Safe Victoria, WorkSafe Victoria, Fire Rescue Victoria and CFA coordinate regulatory input, including planning advice, joint site inspections and fire safety guidance.	Identifies and manages emerging risks as the sector grows.	Underway A referral has been received from FRV requesting some additional information and modelling. The proponent is currently preparing a response to resolve outstanding items.
L7	Construction and local amenity	Engage early with VicRoads, telecommunications and fibre providers to coordinate traffic management and infrastructure requirements, including shared underground conduits where possible.	Avoids repeated excavation disrupting local streets.	Complies DTP Roads & Jemena have both provided referral responses and do not object to the proposal subject to conditions. These conditions can be captured in any permit that issues.

Community, First Peoples and environment

- **Proactive Engagement:** *proponents must actively engage with local communities, First Peoples and host municipal councils before and throughout the approval process.*

Urbis comments: Various community consultation meetings have been held throughout the development facilitation process see response at Section 2.1

- **Aboriginal Cultural Heritage:** *where a proposal involves a high-impact activity within an area of cultural heritage sensitivity, a Cultural Heritage Management Plan must be prepared and approved by the relevant Registered Aboriginal Party.*

Urbis comments: Consistent with the requirements of the Aboriginal Heritage Act 2006, a preliminary Aboriginal Heritage Tests (PAHT) was prepared for the original warehouse permit application on the site (since amended to allow for early works in association with the proposal). This was approved and determined that a CHMP was not required to be prepared based on evidence of significant ground disturbance already having occurred on the site.

- **General Environmental Duty:** *every operator must proactively identify and minimise adverse environmental impacts during initial site selection. Proponents are expected to proactively identify and minimise adverse environmental impacts, including risks to native vegetation, waterways, and*

land, during the initial site selection phase, rather than attempting to mitigate poor locational choices during the formal assessment process.

Urbis comments: The site is a cleared and previous contaminated site that is within a state-significant industrial precinct. There is negligible vegetation present on site and critical stormwater infrastructure was approved and constructed under a previous permit (approved 2025) for warehouses at the subject site.

- **Environmental Sustainability and Landscaping:** updates to state planning policy will enable assessment of trees, water sensitive urban design, landscaping and visual bulk.

Urbis comments: The proposal already responds well to key environmental and landscaping outcomes with the provision of a detailed landscape plan and public realm upgrades with canopy plantings and greenspace proposed.

4.2 New Energy Supply and Grid Readiness

#	Requirement	Detail	Purpose	Urbis comments
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.	Matches new demand with new generation rather than drawing on existing supply.	Complies GreensquareDC supports the Bring Your Own Power requirement and has a plan to meet it. We are shortlisting renewable developer and trader partners with Victorian new-build wind, solar, battery storage and hybrid projects, to complement any PPA portfolio our customers bring or offer them real renewable and firming offsets, rather than simply surrendering LGCs. Compliance and verification will align with Commonwealth standards as they are finalised
E2	Meet connection costs	Cover all connection costs and network augmentations required as a direct result of new investment, including necessary upstream augmentations.	Ensures costs are not passed on through energy bills to other consumers or businesses.	Complies Greensquare DC will cover all connection and network costs identified by Vicgrid and Ausnet to connect and supply electricity to the site. Greensquare DC continues to work closely with Ausnet as part of preliminary works to ascertain required scope and Vicgrid requirements ensuring other customers are not impacted.

E3	Maintain system security	Participate in demand flexibility services to the maximum extent commercially and technically possible.	Maintains electricity system stability as large new loads connect.	Complies Greensquare DC will participate in demand flexibility services as required by VicGrid to ensure the electricity network remains secure and stable. We continue to work closely with VicGrid through Data centre and network modelling ensuring the data centre complies with onerous network conditions to maintain system stability.
E4	Deliver efficient performance	Achieve high levels of power usage effectiveness, designed to industry best-practice targets and measured to recognised national standards.	Reduces total energy draw per unit of IT load.	Complies The proposal targets an industry-leading Power Usage Effectiveness (PUE) outcome, reflecting the importance of operational efficiency in reducing long-term energy demand associated with data centre infrastructure. The design is currently translating to a peak PUE of 1.3. The annual PUE will be less than the peak PUE (with a current target of 1.16), and it is anticipated that the project will achieve a PUE equivalent to a 5 star NABERS rating. Please see the SMP prepared by Aurecon for further detail.
E5	Support the transition	Meet these requirements while contributing positively to Victoria's legislated emissions reduction and renewable energy targets.	Aligns sector growth with the state's decarbonisation trajectory.	Complies Greensquare DC currently offsets 100% of DC energy use with renewables, which was not previously a development or legislated requirement, but forms part of their principles.

4.3 Protecting Drinking Water & Securing Supply

#	Requirement	Detail	Purpose	Urbis comments
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	Shifts demand away from drinking water supplies.	Complies. To reduce potable water demand, the facility has been

#	Requirement	Detail	Purpose	Urbis comments
		or hold an agreement with their water corporation to transition when available.		designed to harvest rainwater from its roof to supplement the water as part of its low-water cooling approach.
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.	Ensures interim potable use does not reduce overall system supply.	Complies. The proposal has been designed with a low-water cooling approach to reduce water consumption. As such, it does not use traditional cooling towers, instead it uses a closed-loop hybrid cooling system that recirculates water and operates water-free for most of the year. Water is therefore only introduced during periods of very hot weather.
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.	Aligns data centre water use with obligations on other water users during drought.	Complies. GreenSquare intends on transitioning to recycled and non-potable water supplies in cooling once these sources have become available. In accordance with this intention, the facility has been designed to accommodate for this.
W4	Be efficient, measure it, report it	Design to dWUE $\leq$ 1.0 (potable) or $\leq$ 1.6 (non-potable), otherwise agreed with the water corporation. Measure in line with ISO/IEC 30134-9:2022 and publicly report water use.	Demonstrates efficient resource use and supports transparent public reporting.	Complies The SMP attached with the application outlines the potable water design. The intended WUE is 0.093L/kWh. Measures have been taken to reduce potable water consumption by more than 80% in the buildings air-conditioning chillers and when testing fire safety systems. The potable water use will be further reduced through efficient fixtures and fittings with minimum WELS Ratings (see Table 2 in SMP), which indicates a 25% reduction in potable water use.

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W5	Pay for infrastructure	Meet the full cost of water infrastructure required to service the connection; contribute where demand brings forward augmentation.	Protects the existing customer base from cross-subsidising new large users.	Complies. The Proponent is accommodating the cost of required infrastructure required to service the connection. It is noted that critical stormwater infrastructure was approved and delivered under the previously approved warehouse permit.
W6	Support national standards	Align with mandatory minimum water-use standards being developed by the Australian Government with states and territories.	Consistency with the national approach agreed by National Cabinet.	Complies. GSDC MEL1 Aligns with mandatory minimum water use standards by designing industry best-practice Hybrid closed-loop cooling systems, whereby, through control logic, the facility will only evaporate water at temperatures greater than 27C to reduce our impact on the grid. Based on historical BOM data from 1995 to 2025, this accounts for a yearly average of 3.62%. Therefore, for 96.38% of the year, the facility will operate completely dry with no water consumption for cooling

4.4 Victorian Jobs, Skills and Local Benefit

#	Requirement	Detail	Purpose	Urbis comments
J1	Train Victorians	Support training through apprenticeships and traineeships, TAFE and tertiary partnerships, or bursaries and scholarships connected to real employment.	Builds a skilled workforce pipeline tied to actual jobs.	GreenSquare is exploring opportunities to partner with local organisations, education providers and community groups. We will also look for opportunities to support skills development, apprenticeships and initiatives that contribute to the long-term wellbeing of the local community as our community program evolves.
J2	Buy Victorian	Prioritise Victorian content and local suppliers; engage with	Extends economic benefit beyond direct employment.	GreenSquare DC have expressed their preference to

		government on opportunities to support local supply chains.		prioritise Victorian content and local suppliers. This has been formalised through engagement with the local community and understanding key areas where there may be immediate opportunities to contribute to local infrastructure and/or community groups. Further, the Economic Benefits Assessment prepared by Urbis nominates that the proposal will contribute \$35 million total annual GVA (\$20 million direct & \$15 million indirect) to the Victorian economy on an ongoing basis from the daily operation, management and maintenance of the facility.
J3	Work with the workforce	Coordinate with industry, government and unions so skills development keeps pace with demand.	Aligns training supply with sector demand.	As noted, GreenSquare are actively engaging with tertiary institutions to ensure that training supply aligns with rapidly increasing sector demand.
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.	Directs employment benefit to host communities.	Not relevant to the proposal as it is located in metropolitan Melbourne.

Should you have any questions or wish to discuss this further, please don't hesitate to reach out.

Kind regards,

