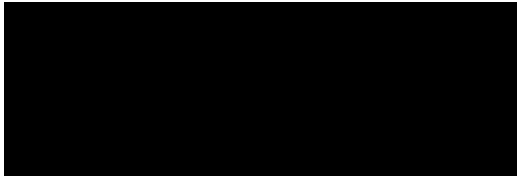
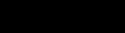


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Dear 

PPA-2025: 44-76 Simcock Avenue Spotswood

Cover Letter and Response to Eligibility Letter and Pre-application Referral Comments

1 Introduction

Urbis continues to act on behalf of the permit applicant, GreenSquareDC, in relation to the above-mentioned application at 44-76 Simcock Avenue, Spotswood, for a Utility Installation (Data Centre).

This application is made pursuant to Category 1 of Clause 53.22 of the Hobsons Bay Planning Scheme, on the basis that the Department of Transport and Planning has confirmed the proposal's eligibility by letter dated 20 July 2026, having regard to the following:

- The proposed land use is Utility Installation;
- At least \$20 million if any part of the land is in metropolitan Melbourne.
- Information demonstrating the likely feasibility of the proposal has been provided to the satisfaction of the Minister for Planning, including written advice from the Chief Executive Officer (or delegate) of Invest Victoria.

On 27 March 2026, a complete Clause 53.22 pre-application submission package was lodged with the Department of Transport and Planning (DTP). Following lodgement, the application was referred to a number of stakeholders.

This letter provides a consolidated response to DTP's further information request, as well as the referral comments received from the following referral bodies:

- EPA, received 14 September 2026
- Jemena Electricity, received 3 June 2026
- Hobsons Bay City Council, received 26 May 2026
- DTP Transport, received 5 May 2026

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- Greater Western Water, received 23 July 2026

It is noted that a Fire Rescue Victoria (FRV) referral was received on 23 September 2026. This RFI has requested additional information and detailed modelling which will be undertaken in the coming months.

It is further noted that the proposal includes activities which are prescribed permission activities under the Environment Protection Regulations 2021 for:

- *G04-Bulk Storage*
- *K01-Power Generation*

This means a separate EPA approval (known as a Permission) is required. This will involve an additional assessment process. The Permissions assessment is separate from EPA's assessment of the planning permit application (provided at Section 4.5). Detailed modelling required under the Development Licence process will also be available during a separate public notice period (via Engage Victoria Website).

This letter addresses each matter in turn and outlines how the proposal has been amended, clarified, or otherwise satisfies the requirements raised.

In support of this submission, please find enclosed:

- Copy of Titles (all consolidated into one file)
- MPL Certificate
- Planning Report, prepared by Urbis, dated September 2026
- Architectural plans, prepared by Greenbox Architecture (Woolpert), Rev 5 September 2026
- Urban Context Report, prepared by Greenbox Architecture (Woolpert), dated July 2026
- Landscape Plans, prepared by Urbis, dated July 2026
- Transport Impact Assessment, prepared by Urbis, dated July 2026
- Waste Management Plan prepared by Urbis, dated July 2026
- Sustainable Management Plan, prepared by Aurecon, revision 3, dated July 2026
- Stormwater Management Plan, prepared by Aurecon, dated July 2026
- Acoustic Report, prepared by Aurecon, dated 9 July 2026
- Economic Benefits Assessment, prepared by Urbis, dated July 2026
- Letter of landowner consent, dated July 2026

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2 Summary of Changes

In response to the referrals received and ongoing consultation the following changes have been made to the proposal:

- Commitment to substantial public realm upgrades (works in kind or financial contribution to be negotiated with Council) – See Planning Report for further detail.

- Additional landscaping to Hall Street and maximised landscaping throughout the site
- Metal Picket fencing to be provided around the perimeter (or alternate appropriate fence to be provided to Council's preference)
- Provision of solar PV
- Reduction of Hall Street emergency access crossover width

Further to the above, the proposal has been amended to respond to referral comments, particularly by strengthening the acoustic and ESD response. Please see the respective reports prepared by Aurecon for further detail.

3 DTP Eligibility Letter Response

3.1 RFI Items

This section responds to each item raised for further information in the Department's Eligibility letter:

Table 1 – Response to further information

Item	Response and Document Reference
A. Certificates of title, including any encumbrances, covenants, and agreements (less than three months old).	See attached
b. Metropolitan Planning Levy receipt of payment.	See attached
c. A revised Environmental Noise Impact Assessment, (as per the EPA comments).	An updated Environmental Noise Impact Assessment has been prepared (Revision 2) and substantially addresses items relating to the equipment schedule, mitigation and noise protocol compliance issues; however, EPA's requests regarding low-frequency noise, stage-by-stage assessment and generator testing planning is currently being modelled and are currently being addressed through further assessment. It is noted that the project team is lodging the EPA licensing requirements shortly and are in active communication with the EPA around the required approvals as well as the required response to the comments provided to this planning application. A Comprehensive response to all items (as negotiated with the EPA) will be provided shortly

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Item	Response and Document Reference
	after lodgement to ensure all comments are picked up within the revised documents.
d. An air quality assessment (as per the EPA comments).	This is being completed currently. As per the above, discussions with the EPA are ongoing and full documentation will be provided after the EPA licensing discussions have resolved with the EPA in the coming weeks.
e. Updated to the Ecolink Report (March 2026) to: i. Depict the study area associated with the assessment ii. Clarify why a permit is triggered under Clause 52.17 if no native vegetation is present on site.	We have not provided an updated assessment as the information sought is within the report previously provided (dated March 2026). Furthermore, native vegetation removal has been sought in the early works application with Council and therefore does not relate to this application. Notwithstanding, we provide the below to answer DTP's queries: i. The study area is the address as shown in Figure 1 of the report that was previously provided by EcoLink. ii. The planning scheme states that there is a permit requirement to remove native vegetation (with some exemptions, however these exemptions are not met in the bulk earthworks proposal which is why native vegetation removal was sought. The study area contains some native vegetation, such as the Fragrant Saltbush, and other listed in Table A1 of the report. There are however no patches of native vegetation or scattered trees defined under the Guidelines and therefore we don't expect any offsets from the removal of the native vegetation that has been identified. Again, this permit permission has been sought and captured within the application with Hobsons Bay City Council for early works and should not be assessed within this application. (Hobsons Bay reference PA230665-1).
f. Amended plans that: i. Provide a clear development summary including total GFA of each phase, total office space, total car parking etc	See attached plans prepared by Greenbox dated 22 July 2026 i. Provided in the Cover Sheet of the Architectural plans

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Item	Response and Document Reference
ii. Provide additional recesses or other mechanism to break up the built form of the proposed buildings, particularly along the interface to Hall Street and Simcock Avenue to reduce visual bulk when viewed from the street. iii. Address Council's concerns (as far as practicable) and a design response to the items raised by them. iv. Clarify fencing materials to be used and height of fencing (noting Council requested this be metal picket fencing) v. Include location of solar PV on the roofs of tech buildings vi. Dimension entry and exit accessways, car parking spaces and car parking aisles. vii. The location, details and dimensions of the proposed signage. viii. Location and details of any noise attenuation measures recommended by the Environmental Noise Impact Assessment. ix. Landscape Plan, cross sections to demonstrate adequate separation from security fence and canopy tree planting around perimeter.	ii. The visual impact of the proposal from the Simcock and Hall Street intersection has been mitigated through generous landscaped setbacks. This has been designed so that the large building is stepped back into the site from this viewpoint on the street, making the visual impacts more seamless. iii. See response to Council's comments below (Section 4.1). iv. Metal picket fencing has been adopted to respond to Council's feedback. It is noted that no chain wire fencing is to be used along Hall Street or Simcock Avenue. However, it is likely that the substation will require some provision of wire fencing due to safety requirements. v. ESDC has confirmed it can commit to solar PV on the roofs of the Tech buildings, with provision above the data halls to be explored further by Aurecon. vi. These have been added. See site plan in attached plans. vii. We request that provided signage details be a condition of permit. At this stage, an area for future backlit signage zone has been shown indicatively on the plans (see site elevation drawing on the attached plans). viii. This information is not available yet as this assessment is still being conducted. These results can be provided after formal lodgement. ix. The elevations in the attached plans show the separations of landscaping from security fence and building. Furthermore, the landscape plans prepared by Urbis show the offsets of canopy trees and landscaping.
9. Town Planning Report and Waste Management Plan updated to ensure reference to Hobsons Bay City Council.	See attached and updated: - Planning report prepared by Urbis - Waste Management Plan

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Item	Response and Document Reference
h. Further information regarding the proposed underground tanks and how this will be managed given the soil contamination on-site.	Contaminated land specialists have advised that residual soil contamination is anticipated to be intersected broadly across the site and the location of the proposed underground tanks is no exception to this. Due diligence assessments have indicated that spoil generated during site works, including from underground tank excavations, may be reused in the event it is not surplus to project requirements. If gross soil contamination (i.e. free-phase fuels/oils, ACM etc) is observed during excavation, then the material will be sampled and handled separately to confirm appropriate management option. Spoil excess to the project's needs will be sampled, characterised and lawfully disposed off-site. Final site layout will be in accordance with the SMP which requires the site to either be covered with hardstand or with a 0.5 m layer of soil that meets the definition of EPA Fill Material. Management of all soil at the site will be required to be completed in accordance with the contractor's construction environmental management plan (CEMP) and health and safety procedures The following information has been provided in the Contamination Report prepared by Aurecon in relation to required excavation: As per the SMP (Golder, 2023), the following <i>procedures should be followed as a minimum when excavating soil at the site:</i> ▪ <i>Subsurface soils beneath physical barriers (Area A) should be assumed to be contaminated (unless demonstrated otherwise)</i> ▪ <i>Excavations should be kept as shallow as practicable</i> ▪ <i>Excavations should be left open for the minimum possible length of time</i> ▪ <i>Excavations should be undertaken in a staged manner to reduce the area of exposed disturbed soil and minimise the potential for</i>

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Item	Response and Document Reference
	<i>the generation of standing water in large excavations.</i> <i>Complete site investigations to confirm the nature and extent of soil contamination.</i> <i>The overall intention is for contaminated existing fill to be ameliorated to become suitable for fill requirements within the site, which will avoid the need for disposal.</i>
i. The Traffic Impact Assessment updated to: i. Confirm whether the accessway is proposed as one-way or two way traffic; ii. include clarification on what truck restrictions will apply and what appropriate measures will be implemented to manage these restrictions at the site entry. iii. Clarify car parking provision discrepancy between TIA and Architectural Plans.	See attached updated Traffic Impact Assessment (Final 3) provided by Urbis. i. This comment is addressed in the updated TIA. Commentary and diagrams have been included in the report to illustrate the accessway circulation between Stage 1 and Future Phases: The accessway width has been designed to accommodate two-way vehicle movements within the Stage 1 area and one way operation across the internal road network in the end state development. The two-way arrangement in Stage 1 is required to support vehicle movements to, from and within the site, prior to the development of the internal perimeter road in the end state development. In the end state development, once the internal perimeter road is fully constructed, the internal accessway is intended to operate as one way throughout the site, functioning as a ring road around the site perimeter. ii. The TIA has been updated, and in response to this comment: - The adjacent road network including Simcock Avenue forms part of the National Heavy Vehicle Regulator (NHVR) network map, permitting heavy vehicles to access the site. (Updated at Section 2.4.4) 19 m AVs and 12.5 m HRVs will be the largest trucks expected on site during operation and will

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Item	Response and Document Reference
	be scheduled prior to arrival on site. (Updated at Section 3.1.1) - Given the security requirements of the proposed data centre, all vehicle entries to and exits from the site will be managed by on-site security, with boom gates near the site entry and at the guard house. Any vehicles not permitted on site will be directed to exit via the rejection loop without entering the facility. (Updated at Section 3.1.1) iii. We have recounted the car parking provision on the latest site plan and confirm that the provision referenced in the TIA matches the site plan, including: - Car spaces: 113 (including 107 standard spaces, 2 DDA spaces and 4 EV spaces) - Motorbike: 10 - Bicycle: 30 - Total: 153 The parking schedule on the architectural plan cover sheet has been updated to match the total car parking provision shown in the site plan.
j.	SMP to be amended to include written justification for the use of proprietary stormwater treatment devices instead of natural or passive treatments systems considering long-term performance, environmental outcomes and lifecycle impacts. Given the restricted site footprint, natural and passive treatment solutions were not fit for purpose. To achieve compliance with WSUD requirements, proprietary treatment devices have been selected and integrated into the design in consultation with the supplier. Please refer to the SMP for further detail.
k.	Formal response from Aurecon regarding local and low carbon materials to be used. Aurecon have confirmed the following objective; <i>Achieve a 10% reduction for embodied carbon (GWP), utilising the LEED 4.1 BD+C methodology for the Whole-Building Life Cycle Assessment credit as best practice guidance.</i>

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Item	Response and Document Reference
I. Submission of Building User Guide	We request that this be a condition of permit. This is a requirement at the construction/building stage and is not a planning permit requirement.

3.2 Preliminary Items

The following items have been raised within DTP's Eligibility Letter to be addressed in our formal lodgement package.

a. Item	Response and Document Reference
b. Urbis have advised in correspondence to Council dated 22 June 2026 that there is a commitment to provide substantial public realm upgrades as part of the development, which would be delivered either through works in kind or a monetary contribution. Please confirm the extent of public realm upgrades proposed and the mechanism to deliver so this can be conditioned accordingly on a future permit	USDC's commitment to public realm benefits is to be confirmed through the extensive consultation process underway with the community, Council and stakeholders. As discussed at the recent meeting with Council officers on 16 June 2026 (see additional information on this contribution in Section 3.3 and 6.3 of the TP report). It is considered appropriate that the public realm works are delivered in accordance with the GreenLine Project Plan, subject to further input from Council and the community. Due to the number of infrastructure projects in the area the ability and potential timing required to deliver these works as works in kind is to be resolved with Council leadership, the community and respective stakeholders (LXRP, Ausnet etc). Notwithstanding, we consider that a permit condition could ensure an agreement is reached post permit issued.
c. Given the large size of the site, additional landscaping throughout the development should be incorporated (where practical). Landscaping should also be increased for the full length of the Hall Street frontage given the presentation to residential further west.	This has been actioned in the provided sketch plans along Hall Street, with landscaping maximised along Simcock Avenue. The setbacks which were proposed with gravel for pedestrian circulation, have now been updated to be landscaped areas, providing a higher quality amenity area to the surrounds of the building.
d. Demonstrate canopy tree planting around the perimeter of the site and within car parking spaces. Ensuring	As noted above, the maintenance pathways have been reduced to allow for additional planting. Canopy planting has been maximised where possible noting

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a.	Item	Response and Document Reference
	there is adequate setback from the security fence and canopy trees to be provided.	that streetscape planting will contribute to the canopy cover when viewing the site from the public realm.

- e. Council have mentioned that the Stormwater Management Plan should result in the same or improved stormwater management outcome when compared to the SWMS approved under PA210039. Ensure the SMP is updated to directly address how the proposal is achieving this. In addition, if natural or passive treatment systems for stormwater are not being adopted, include additional justification in the SMP regarding why.
- It is noted that key stormwater infrastructure was approved under PA210039 and has subsequently been construction on site (i.e. outfall).
- The below assessments demonstrate the proposed treatment performance against the approved warehouse development. As demonstrated, the proposal seeks a similar reduction (improved in some instances) to the approved warehouses.

Proposed Treatment performance (SWMP prepared by Aurecon)

	Sources	Residual Load	% Reduction
Flow (ML/yr)	33	33	0
Total Suspended Solids (kg/yr)	5730	320	94.4
Total Phosphorus (kg/yr)	11.3	3.06	73
Total Nitrogen (kg/yr)	81	42.9	47.1
Gross Pollutants (kg/yr)	1250	2.71	99.8

Approved Treatment performance (SWMP prepared by Incitis)

Table 5.4 Treatment Performance for 44 – 76 Simcock Avenue, Spotswood

Pollutant	Source Load (kg/yr)	Residual Load (kg/yr)	% Reduction
Total Suspended Solids (TSS)	6,900	1,390	80%
Total Phosphorous (TP)	14.1	5.81	59%
Total Nitrogen (TN)	97.6	51.6	47%
Gross Pollutants (GP)	1,290	0	100%

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Given the restricted site footprint, natural and passive treatment solutions were not fit for purpose. To achieve compliance with WSUD requirements, proprietary treatment devices have been selected and integrated into the design in consultation with the supplier. Please refer to the SMP for further detail.

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a.	Item	Response and Document Reference
f.	The proposal includes provision of underground tanks at various locations throughout the site. Given the site history and contamination, please seek further written advice from a suitably qualified consultant regarding how placement of these underground tanks will be managed so as not to disturb contaminated soils.	Please see response at item h. of Section 3.1 above.
g.	DFP note that there is a current s72 amendment being progressed separately with Hobsons Bay City Council relating to Permit PA230665 for early bulk earthworks and vegetation removal under Clause 52.17. At time of formal lodgement, please clarify and submit: – why Clause 52.17 of the Hobsons Bay Planning Scheme is triggered when the Ecolink Report in March 2026 states there is no native vegetation on site; – Amend and submit an updated Ecolink Report to depict the study area in question within the report; and – provide an update of the status of the s72 amendment.	The study area contains some isolated native vegetation, such as the Fragrant Saltbush, and other listed in Table A1 of the report. There are however no <i>patches</i> of native vegetation or scattered trees defined under the Guidelines and therefore we don't expect any offsets from the removal of the native vegetation that has been identified. Again, this permit permission has been sought and captured within the application with Hobsons Bay City Council for early works and should not be assessed within this application. (Hobsons Bay reference PA230665-1). The Section 72 Amendment is under consideration; Council have indicated a decision is expected mid-August.
h.	The EPA provided feedback on the proposal, seeking additional information and reporting. At time of formal lodgement, please submit the following: – the Environmental Noise Impact Assessment prepared by Aurecon (dated 13 March 2026) has	An Air Quality Assessment and revised Acoustic Report are being prepared to respond to specific items raised by the EPA. The modelling for the acoustic reporting is underway and will be provided in the coming weeks post formal lodgement. These reports will also be subject to assessment under the required EPA approval processes which is running concurrently to the

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a.	Item	Response and Document Reference
	deficiencies. Prior to formal lodgement, the Noise Assessment should be amended to address the EPA comments. This was shared with Urbis via email on 12 June 2026. – An air quality assessment needs to be supplied in relation to potential release of sulphur hexafluoride within switchgear and other electrical components associated with the use. This was shared with Urbis via email on 12 June 2026 and will need to be prepared and lodged at formal submission. – In accordance with the GED, EPA reinforces that the proponent must develop the site with the best available techniques and technologies (BATT). It is expected that the proponent identify how, at an early stage in the design, the proposal has been developed to minimise the risks of harm to human health and the environment so far as reasonably practicable. Additionally, the consideration and meeting of climate change and greenhouse gas emission requirements are obligations of the general environmental duty. EPA Publication 2048: Guideline for minimising greenhouse gas emissions provides advice for operators to help meet the responsibilities under the Environment Protection Act 2017.	planning application. As such, we are looking to progress the planning application on the basis that the detailed modelling is underway and will address the items raised by the EPA.

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4 Referral Response

This section provides responses to comments received from internal departments and other referral authorities, noting where changes have been made or where matters can be addressed via permit conditions.

4.1 Council – Planning

Site Layout	
Council Comment	Response
<i>The car park, vehicle entry, guard house, fire pump, water meter assembly and substation appear as an afterthought, creating an undesirable entry and presentation to the prominent corner. Relocation of the substation from the prominent intersection of Simcock Avenue and Hall Street. It is a favourable response to see the substation located to rear of the site away from the street frontages. Any fuel storage, associated tanks and fire equipment including the fire tanks and fire pumps, should also be relocated to the sides of the buildings (and well behind any building frontage) or central to the site and between buildings. Council officers acknowledge these facilities are necessary part of the proposal but appear as an afterthought and create an undesirable appearance to the street frontages and reinforce a 'back of house' and affirm the industrial nature of this site</i> <i>The 'chimneys' and 'water tanks' placed around the building and where prominent from a street frontage should be screened with a perforated metal screen to minimise the visual impact of these services and facilities.</i>	The site layout has been informed by multiple pre-application meetings with Council planners (refer section 4 of the TP report). The site is within a very established industrial area. It is highly appropriate for a utility installation development, and the built form should not need to conceal its industrial function within this zone. The substation must have access from the street and is constrained by servicing infrastructure being provided from the west. The substation will require 24/7 unrestricted access from the street, in accordance with energy provider requirements. The substation is being assessed under a separate application to DTP. However, discussions are ongoing with AusNet in relation to the ultimate treatment of the substation to ensure it provides visual interest and appropriately screens any unsightly plant (see further information on this in section 4 of the TP report). Water tanks and fuel tanks are required separately for each building and are integrated within the ground floor, positioned behind the building line to minimise visibility from the public domain. Additionally, the water tanks were previously described as a feature of the proposal. The fire pump room, associated tanks, and water meter assembly locations will be as required by FRV. Each data centre must be serviced with adjoining fuel tank storage that must be accessed via large vehicles. The design is consistent with the requirements of an industrial zone, and particularly, the existing industrial character along Simcock Avenue.

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ARCHITECTURAL VIEW

Feedback received from Council during pre-lodgement discussions was consistently encouraging of emphasising the operational elements of the data centre and not 'shying away' from its form. This was inherently embedded into the design ethos and has informed the visually striking proposal.

Repositioning the water tanks, car parking and most services behind the data centre would result in a continuous, solid data centre form along Simcock Avenue, as demonstrated in the design iterations.

Relocation of the car parking away from the prominent intersection of Simcock Ave and Hall Street and instead located to the 'Tech Building A' in the prominent corner. Ideally this building should take up a significant amount of both frontages

The carparking location allows for vegetation to this key interface and makes an efficient use of the site. Tech building A is located to address Hall Street and provides glazing and views to Simcock Avenue. It also allows visual surveillance of the car parking area on Simcock Avenue.

Relocating Tech Building A to the intersection would increase built form mass at this key corner, resulting in a less favourable architectural and urban design outcome – as demonstrated through the earlier iterations of the proposal (March and May 2025).

Tech Building B' should be located closer to the Simcock street frontage, with parking located to the side of this building.

Building A-B, D-F and H-J should be setback behind the front building line of the Tech Buildings.

The site requires a trafficable loop around the building for general access and, critically, for emergency vehicle access. Attempts were made to respond to this request, but the arrangement could not be accommodated due to access requirements for the refuelling areas. Notwithstanding this, it is considered that the proposed plan provides an appropriate outcome in an industrial zone through stepped setbacks, vibrant high-quality

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materials and the landscaped setback through the car park area.

Incorporation of public realm works, particularly around the prominent intersection of Simcock Ave and Hall St, as well as along the interface with the GreenLine Project corridor.

Provision of any opportunity to link active transport infrastructure. The draft Spotswood Structure Plan identifies a key pedestrian and cycle route along Hall Street (GreenLine Project). The development does not provide opportunities to link active transport infrastructure to this key cycle/pedestrian route.

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GSDC is committed to providing public realm benefits as discussed at the recent meeting with Council officers on 16 June 2026 (see additional information on this contribution in Section 3.3 and 6.3 of the TP report). It is considered appropriate that the public realm works are delivered in accordance with the GreenLine Project Plan, subject to further input from Council and the community.

The proponent will also consider future active transport provision to ensure any public realm design aligns with Council's desired future transport infrastructure.

Additionally, the visual impact of the proposal from the Simcock and Hall Street intersection has been mitigated through generous landscaped setbacks. This has been designed so that the large building is stepped back into the site from this viewpoint on the street, making the visual impacts more seamless. (See render below.)



All services, including water, electricity, gas, sewerage and telephone shown to be installed underground and located to the satisfaction of the responsible authority in order to maximise the opportunity to retain existing trees and plant new canopy trees.

Noted. This detail has been provided in civil drawings and will be considered in relation to impacts on deep soil planting.

Built form

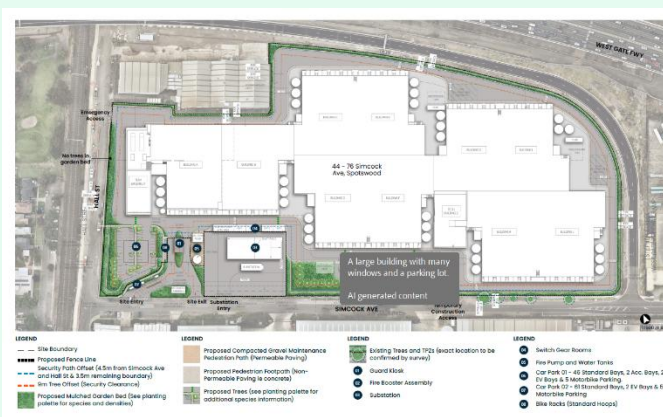
The proposed development is visually dominant due to its scale, massing, height, form, design and siting. The building presents as 'box-like', and with building

The site is located within a large-scale industrial area and therefore the proposed building height is not considered to pose any potential for detriment to the surrounds, with no direct abuttal to residential or

The perceived scale of the built form is significantly reduced due to generous setbacks ranging from approximately 13.7m to 18m, exceeding the typical 9m setback requirement.

The landscaped setbacks are consistent with Council's expectations for industrial development interfaces. We confirm that the proposal now includes generous landscaped setbacks (minimum 4.5m) to Simcock Avenue and Hall Street, and a 3.5m landscaped setback to the remaining site boundaries. The landscaping, paired with other public realm outcomes including the setback of buildings, will contribute to a high amenity public realm outcome. This outcome is consistent with the Hobsons Bay Industrial Land Management Strategy and Clause 15.01-2L-03 of the Planning Scheme, as it balances functional industrial outcomes with a high standard of site presentation. When paired with the committed improvements to the public realm the area will on balance, see a substantial uplift in amenity. See additional information supporting this in section 6 of the TP Report.

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The proposed substation is not appropriately setback from Simcock Avenue. The Hobsons Bay Industrial Development Design Guidelines 2008 require a minimum 4.5-metre setback to ensure space for landscaping and a positive contribution to streetscape character. The proposed development also does not demonstrate a positive and activated corner response along Hall Street and Simcock Avenue, containing car parking and sliding gates accompanied by a guard kiosk.

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See discussion above – the substation is to be owned by AusNet and, as such, AusNet is seeking the necessary approvals through a separate, concurrent application with the Department of Transport and Planning. The siting of the substation is at AusNet's discretion and is located to maximise function; this is considered an appropriate priority in the highly industrial setting.

It is noted that AusNet has advised they have completed community notification for service scanning and geotechnical investigations associated with the underbore, with no concerns raised.

The substation is proposed to be screened by public art, which will contribute to visual interest and the streetscape character, similar to what has been displayed at the VISY development. Conversations with Ausnet are ongoing to ensure that the substation can be screened appropriately, whilst also achieving the safety and operational requirements for the facility. It is confirmed that the substation will be able to be either screened with decorative screening or have a solid wall that can be painted for visual interest.

Reduction to the overall building height. Building heights should not exceed the preferred building height unless a new community benefit can be demonstrated.

As noted above, the site is within a highly industrial area with no maximum building height provided in current policy.

The proposal includes a maximum building height of approximately 25m to the top of the parapet. While this exceeds the discretionary preferred height of approximately four storeys (16-17 metres) identified in the Draft Spotswood Activity Centre Structure Plan for the Northern Industry and Employment Precinct, this variation is considered acceptable having regard to the site's location within a large-scale industrial area. Furthermore, there are no direct residential interfaces, and the visual impact of the proposed height has been mitigated through generous setbacks and landscaped setbacks by a minimum of 4.5m from the street (see additional information in section 6.4.1 of the TP report). We note that the proposal sits directly below the West Gate Bridge and there would be no tangible impact as a

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result of the additional height – particularly as it is concentrated centrally within the site.

Notwithstanding this, the proponent's commitment to public realm upgrades will ensure that the completed development and its surrounds represent a substantially improved outcome when compared with current conditions.

Provision of active street interfaces and greening. The draft Spotswood Structure Plan seeks active street interfaces and greening along streets. The development comprises of high street fencing and a significant 7.0m x 5.5m substation close to corner of Simcock Avenue and Hall Street. The proposal provides minimal active interfaces, passive surveillance or greening along Hall Street or Simcock Avenue. This is particularly important given the Hudsons Road level crossing removal is a rail bridge and provides opportunities for public open space adjacent the site on Hall Street.

The proposal has maximised activation within the operational constraints of the use by locating all glazing and habitable built form (Tech Buildings A and B) towards Hall Street and Simcock Avenue.

Following Council's feedback, landscaping has been increased with a garden bed along the Hall Street location and more grassed areas within the site to provide a more pleasant streetscape setback along Simcock Avenue.

Conversations are ongoing with VIDA who are coordinating the Level Crossing Removal Programming. GSDC have met with VIDA and their delivery partners on three occasions to date (1 April, 11 May and 9 July 2026) to discuss the interface between their works and the proposal. Based on those discussions, the current status is as follows:

- VIDA is currently in the procurement phase, with works anticipated to commence early next year (Feb/March 2027), subject to approvals.
- Proposed traffic management measures have been flagged, including single-lane restrictions along Hall Street for the duration of their works.

Reduction to the overall height of the ancillary office building to two storeys OR the building to be set further back. The draft Spotswood Structure Plan indicates for developments above three storeys, buildings should be setback to retain a human scale. Whilst the development provides a three-storey ancillary office building along the Hall Street interface, the building is not adequately setback. Given

There is a possibility to reduce the extent of office area, however this will reduce glazing and overall engagement with Hall Street and is seen as potentially detrimental to overall passive surveillance to the public realm.

Additionally, the third storey of the office building acts as a visual screen to the data hall behind and associated plant and equipment on the roof of the data centre.

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the interface with the key cycle/pedestrian routes, the ancillary office building should be set back further or building height reduced.

Potential amplified views to this plant are demonstrated below.



Landscaping and Front Boundary Treatment

Deletion of the proposed compacted gravel maintenance path from the landscaping setbacks to Hall Street and Simcock Avenue. The maintenance path should be replaced with appropriate landscaping and trees, including shrubs and ground covers.

This has been actioned in the provided sketch plans along Hall Street, with landscaping maximised along Simcock Avenue. The setbacks which were proposed with gravel for pedestrian circulation, have now been updated to be landscaped areas, providing a higher quality amenity area to the surrounds of the building.

The site boundary fences to Simcock Avenue and Hall Street should be metal picket fencing. Chain wire mesh fencing should be avoided.

Metal picket fencing has been adopted to respond to Council's feedback. It is noted that no chain wire fencing is to be used along Hall Street or Simcock Avenue. However, it is likely that the substation will require some provision of wire fencing due to safety requirements.

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Amenity Impacts

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Council officers are aware of complaints and enquiries which have been received by Council relating to the ongoing operation of existing data centres, namely the concerns relate to the large substations they require, this has also included the use of generators. The use will operate 24/7 and is within proximity to residentially zoned land and dwellings (approx. 50m west of the subject site). Existing amenity should be protected. Measures could include noise mitigation measures for mechanical plant operation in accordance with Environmental Protection Regulations 2021 and the relevant Noise Protocol, management of light spill, and ensuring traffic noise and volumes are reduced during sensitive hours.

As per the acoustic report previously provided, noise emissions to the existing NSAs in the area surrounding the development are predicted to comply with the maximum target noise limits established in accordance with the EPA.

The predicted effective noise levels from the data centre's typical operating scenario are compliant at all NSAs for the whole site.

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Prominence of the site from the Westgate Freeway

The proposed development is located in a highly exposed and visually prominent location, immediately adjacent to the Westgate Freeway. This gateway site is one of the first places westbound commuters would see driving over the Westgate Bridge into Melbourne's western suburbs. Due to this visual prominence, the interface of the proposed development with the freeway must be considered, including its siting, height, form and design. The development should therefore be of a high-quality built form and incorporate façades of visual interest.

A splayed entry has been proposed which will improve public visibility and support activation through public artwork.

Furthermore, visual chimneys and water tanks can be screened with perforated metal screens, however, this is inconsistent with advice received from Council, encouraging the proposal to reveal its form. Further screening will increase solid mass and remove visual interest.

Access and Car Parking

The accessways to have a one-way arrangement. If the accessway is intended to operate as two-way traffic, there does not

As discussed in the Transport Impact Assessment (TIA) Report, the accessway width has been designed to accommodate two-way vehicle movements within the Stage 1 area and one-way operation across the internal road network in the future End State. The two-way

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appear to be sufficient clearance. Hence, a one-way arrangement is recommended.

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arrangement in Stage 1 is required to support vehicle movements to, from and within the site.

In the end state, once the internal circulation road is constructed, the internal accessway is intended to operate as one-way throughout the site, functioning as a ring road around the site perimeter.

It is anticipated that movements by larger vehicles, such as heavy rigid vehicles (HRVs) and articulated vehicles (AVs), will occur infrequently. These movements can be managed by the site operator, including supervision where required, to avoid any potential conflicts from simultaneous on-site movement. The internal accessway north of the proposed substation has been refined since the pre-lodgement submission to provide additional width for turning vehicles.

The swept path assessments attached to the TIA Report demonstrate that HRVs and AVs can safely manoeuvre within the available internal road accessway.

Urbis Transport Advisory have prepared additional swept path assessments which demonstrate the simultaneous movement of a passenger vehicle entering or exiting the west car park and a heavy rigid vehicle (HRV) exiting the site via the guard kiosk under the Stage 1 arrangement.

The swept path analysis to demonstrate an acceptable truck turning movement, as the current analysis shows swept paths to be very tight. Consideration should be given to limiting the types and sizes of trucks permitted to access the site from this access point.

The swept path assessment defines the minimum envelope required for the largest vehicle expected on site (19-metre-long AV for refuelling and 12.5m HRV for deliveries) to circulate within the site. As mentioned in table 1 of the attached TIA, the internal accessway north of the proposed substation has been refined since the pre-lodgement submission to provide additional width for turning vehicles.

Furthermore, the swept path assessments in Appendix B of the TIA demonstrate that HRVs and AVs can safely manoeuvre within the available internal road accessway.

The site entry to use crossover at 90 degrees with the Simcock Avenue road. The angled driveway is not supported and encourages trucks to enter the site from Hall Street.

The site entry design responds to Fire Rescue Victoria requirements for fire truck vehicle access to key safety infrastructure and facilities, including the fire booster

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Trucks should be encouraged to enter the site east from Simcock Avenue.

assembly area and water tanks located at the site frontage.

HRVs and AVs access to and from the site is expected to be infrequent and can be managed by the operator to encourage site access from the east via Simcock Avenue.

Any emergency vehicle access points to be reduced in width to the bare minimum dimensions.

The emergency vehicle access point to/from Hall Street has been reduced from 15 metres to 9 metres and supports manoeuvring of emergency vehicles at this access point.

Sustainability

The proposal does not demonstrate how it will minimise emissions. Council has set a target for the municipality to achieve net zero greenhouse gas emissions by 2030 and has committed to achieving an increase in water use sourced from alternative sources by 20 per cent. To support this proposal, Council is seeking confirmation that the project will take practical steps to minimise emissions, energy demand and potable water use via on-site renewable energy generation, industry-leading energy efficiency measures and cooling technologies, and circular water opportunities, which is also in line with the Federal Government's Data Centre Expectations.

The SMP outlines measures to reduce greenhouse gas emissions in Section 3.3.1. It addresses measures to reduce Scope 1, 2 and 3 emissions. This includes addressing key energy demands for data centres, including cooling through efficient adiabatic cooling systems, as well as metering systems to enable tenants to source renewable energy for the IT load, noting that tenancy energy sources are beyond the developer's control. On-site renewable energy has not yet been committed to across the whole project as roof space has been prioritised for plant installations in the interests of land use efficiency.

Notwithstanding this, GSDC has confirmed it can commit to solar PV on the roofs of the tech buildings, with provision above the data halls to be explored further by Aurecon.

Water efficiency measures are outlined in section 3.3.2 and notably include the use of water-efficient cooling methods (i.e. adiabatic cooling) which uses substantially less water than cooling tower systems. Adiabatic cooling has been proposed as a balanced energy and water efficient cooling solution. The proponent has also provisioned for a recycled water feed to site that will become operational as supply is made available, significantly reducing demand for potable water. This ensures that the industrial processes can and will prioritise alternative water sources for cooling where feasible.

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Additionally, the proposal is inconsistent with the Council Plan. One of the four main themes of the Council Plan 2025–2029 is ‘Sustainable Environment’. Action 2.2.2 of the plan is: ‘Promote energy-efficient and sustainable residential, commercial and industrial development.’ Action 2.3.4 of the plan is: ‘Pursue use of sustainable materials within infrastructure projects to facilitate greater uptake of recycling of waste products.’

GSDC are committed to employ tendering and procurement strategies to reduce embodied carbon by using locally sourced and recycled materials, see Section 3.3.1 of the ESD Report prepared by Aurecon for further detail.

The proposal does not demonstrate that it achieves the best sustainable practices and outcomes. The submitted SMP demonstrates that the proposal meets a 53% BESS Score. However, the SMP indicates that due to the nature of the data centre development, certain categories and credits under BESS are not relevant to the entire building and applicable to regularly occupied spaces only. Data centres have significant demand for water and electricity. The Hobsons Bay IDDG encourages the reduction of electricity use through onsite technologies that can produce renewable sources of electricity (e.g. solar panels and batteries).

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The ESD Report provides further information in addition to the BESS assessment in Section 4, recognising that the BESS rating which is required may not provide a comprehensive assessment for a data centre project. It is noted that the GreenSquareDC projects are guided by a future-focused sustainability framework: the Five Pillars to Sustainability. These pillars reflect a commitment to climate leadership, resource stewardship, and intelligent design. Each pillar represents a strategic area where GreenSquareDC will not only meet regulatory expectations but actively target going beyond to deliver meaningful environmental outcomes. It is noted that the proponent seeks environmental targets beyond the BESS assessment, including applying for a LEEDS V4.1 Gold rating.

Submission of a Building User Guide. Data centres represent one of the highest energy consuming building typologies. Providing clear operational guidance to occupants and facilities teams is critical to achieving intended energy efficiency outcomes.

The SMP lists this as an opportunity for the project, developed during a later design phase.

Provision of a solar PV system. As per the NCC 2022 guidelines, provisions must be made for the installation of a solar PV system. As such, spatial, structural,

The proposal has been updated to demonstrate solar PV on the roofs of the tech buildings, with provision above

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electrical, and servicing allowances for solar PV panels should be incorporated into the design.

the data halls to be explored further by Aurecon throughout the application process.

Any cooling systems should be designed to minimise power output while still meeting the specific needs of business activities.

Energy efficiency of the cooling system is of critical importance to the project and is driven not only by GSDC's sustainability aspirations, but also by direct cost and customer desirability. The project has an annual PUE target of 1.22, which exceeds the PUE target of a NABERS 5 star rating and aligns with the Federal Government Net Zero in Government Operations Strategy. Further PUE reduction will be targeted during design development, which will be optimised to suit specific customer temperature requirements.

Use of supplementary cementitious materials (SCMs), recycled aggregates (where appropriate), and recycled water in any concrete manufacture. This approach directly supports Pillar 3 objectives by reducing Scope 3 embodied carbon associated with construction materials.

(As per item 2 of the sustainability comments above.)

Recycled aggregate for concrete in buildings is not typically recommended but may be investigated for subgrade materials for hardscaping.

Use of responsibly sourced steel, with preference given to suppliers demonstrating reduced embodied carbon, recycled content, and transparent sustainability credentials.

(As per item 2 of the sustainability comments above.)

Use of natural or passive treatment systems (e.g. bio-retention, swales, wetlands) instead of proprietary stormwater treatment devices.

The civil stormwater design for MELI does not incorporate passive WSUD treatment systems such as bioretention basins or constructed wetlands. Instead, the design uses proprietary stormwater quality treatment systems to achieve the required WSUD stormwater reduction targets. This approach reflects site-specific constraints, including the limited land area available for passive treatment assets and potential conflicts with site infrastructure and services. The adopted treatment systems have been selected to achieve the stormwater quality performance objectives while accommodating these site constraints.

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Inclusion of rainwater reuse through the provision of rainwater harvesting, including the installation of rainwater tanks to support water efficiency, reduce potable water demand, and improve overall stormwater management outcomes.

Rainwater tanks are proposed on site and shown on the architectural plans submitted.

Stormwater Management and Drainage

The endorsed stormwater management plan under Planning Permit PA210039 currently presents an acceptable stormwater outcome. Any proposed development should achieve the same or better stormwater management outcomes including the following requirements: the volume of water discharging from the development in a 10% AEP storm shall not exceed the peak flow experienced in a 10% AEP storm prior to development or the capacity of Council's drainage system, whichever is lesser. The peak flow shall be controlled using retardation basins or approved retardation systems located on the subject site to the requirements and satisfaction of the responsible authority. The storage system shall have a storage capacity of a 5% AEP.

The flow paths of a 1% AEP storm need to be determined and the development designed such that no private property is inundated by this storm. These flow paths must be indicated on the plans.

The development should incorporate the council endorsed Water Sensitive Urban Design Sustainability requirements on these plans.

Please refer to Section 6.4 "Pre-Development Hydrology" and Section 6.5 "Post-Development Hydrology" of the attached SWMS. Stormwater management is as per the endorsed SMP PA210039 and is also in line with Clause 53.18 of the Hobsons Bay Planning Scheme, pertaining to stormwater management in urban development. These sections of the attached SWMS outline how the endorsed stormwater management strategy involves reducing flows into the north-east. However, as the proposal involves the construction of a new 1% AEP pipe network discharging directly to Stony Creek, the strategy is deemed to improve the local catchment hydrology and provide a safer discharge route into Stony Creek, where all flows ultimately merge.

In regard to post-development peak flows, the SWMS outlines how the proposed development leads to an overall decrease in impervious area compared to the sites previous condition, which implies there will be no increase in either discharge volume or flow rate.

For the flow paths, please refer to section 5.2.2 "Proposed Legal Points of Discharge (LPD)" of the attached SWMS.

For the council endorsed WSUD requirements please refer to section 7 "Stormwater Quality Assessment" of the attached SWMS.

Bushfire

Provide a Fire Hazard Assessment

A Fire Hazard Assessment was provided to DTP to support external referrals.

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4.2 DTP transport

Item No.	Description	Response
1.	SPA will be requiring construction access to the rail corridor from Hall Street throughout construction of the Hudsons Rd LXP, and this will likely result in temporary closures of Hall Street, particularly adjacent to 44-76 Simcock Ave, through to the end of 2028. Note this will likely mean the emergency vehicle access point as indicated on the plans will not be accessible during construction of the Hudsons Road LXP (though access from this point after Hudsons Road LXP construction is expected to be retained). SPA will also require use of Simcock Ave for haulage routes during construction. A condition will be required to a future approval which would require construction staging info be provided to the satisfaction of VIDA Rail through a Construction Management Plan or similar, prior to construction commencing on 44-76 Simcock Ave.	The Hall Street access is proposed for emergency vehicle access only. In the event of temporary Hall Street closures associated with the Hudsons Road Level Crossing Removal Project (LXP), emergency vehicle access would continue to be available via the primary site entry crossover and would not rely on the Hall Street emergency access points during construction of the LXP. It is also anticipated that Stage 1 of the development would not be fully constructed or operational during the LXP works. During this period, emergency vehicles would be able to use the temporary construction entry/exit at Simcock Avenue, utilising the existing crossover, to access the site as an alternative emergency access point if required. GreenSquare are engaging in ongoing consultation with LXP (VIDA) to coordinate construction timing and ensure there are no conflicts between the two proposals.

4.3 Jemena – Electricity

Item No.	Description	Response
1.	Any plan of subdivision submitted for certification under the Subdivision	The Applicant acknowledges and does not object to the referral comments raised by Jemena. Engagement with

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Act 1988 is to be referred to Jemena in accordance with Section 8 of that Act

The Applicant is to enter into an agreement for the extension, upgrading or rearrangement of the electricity supply as required by Jemena. A payment to cover the cost of such work will be required and easements and provision of sites for substations may also be required

Where buildings or other installations exist on the land to be subdivided and these are connected to the electricity supply, they are to be upgraded to comply with current Victorian Supply and Installation Rules (VSIRs) to the extent determined by Jemena

The No Go Zone requirements must be adhered to

Jemena regarding electricity supply to the site is already underway and is currently progressing through feasibility, with a formal supply agreement to be finalised in due course, including any associated costs, easements, or site requirements.

There are currently no existing buildings, live electricity connections and/or other active utility connections on the subject land. All construction activities will be undertaken in accordance with applicable No Go Zone and electrical safety requirements.

4.4 Greater Western Water (GWW)

Item No.	Description	Response
1.	Water It is essential the owner of the land enters into an agreement with Greater Western Water for the provision of water supply.	The application is not seeking subdivision – Urbis understands that DTP are clarifying the requirements of this agreement with GWW as it may not be applicable to the development application.
2.	Sewer It is essential the owner of the land enters into an agreement with Greater Western Water for the provision of sewerage. Prior to certification, the Plan of Subdivision must be referred to Greater Western Water in accordance with Section 8 of the Subdivision Act 1988.	See above.

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Item No.	Description	Response
3.	The following is for information purposes only. The applicant should be made aware that an application has been lodged with Greater Western Water for this development (GWW Reference: SRA/25/00018). Greater Western Water cannot consent to the issuing of a statement of compliance until the conditions set out in that application have been met.	See above.

4.5 EPA

RFI ITEM	Response and Document Reference
Noise	
Revised acoustic report that addresses the following:	
Details of equipment/ noise sources (including but not limited to fans), plant numbers, locations and noise emission data across the frequency spectrum to inform risk of low frequency emissions.	Details of equipment assessed are included in the Aurecon Noise Impact Assessment which included the “worst-case” typical operation scenario and emergency generator testing scenarios. The primary noise source equipment assessed under these scenarios includes: • Evaporative air cooled chillers • Substation transformers • Emergency electrical generators • Generator load banks A revised noise impact assessment has been completed based on updated current equipment noise data and spectrums, and a further assessment of low frequency noise as per EPA Publication 1996. This document will be provided to DTP and the EPA once finalised.

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An assessment of effective noise levels against the project noise criteria with EPA Publication 1826.5: Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues (the Noise Protocol) that includes:

- i. **Consideration and assessment of low frequency noise from the identified noise sources;**
- ii. **background noise**
- iii. **generator testing schedule**

The Noise Impact Assessment has been conducted in accordance to Noise Protocol (EPA Publication 1826.5) and the Technical Guide (EPA Publication 1997).

Noise limits have a cumulative adjustment following the equal sharing principle as per the Technical Guide, based on noise sources audible during background noise measurements.

The updated Noise Impact Assessment uses derived 1/3 octave noise data, based on project equipment selections from manufacturer datasheets, or empirically derived where datasheets are unavailable. The assessment allows for:

- A tonality assessment, as per the Technical Guide.
- A low frequency assessment, as per EPA Publication 1996 Noise guidelines: assessing low frequency noise (EPA Publication 1996)

An assessment of low frequency noise emissions from the data centre consistent with EPA Publication 1996: Noise guidelines: assessing low frequency noise and demonstrate that the level of risks associated with these emissions, and how they will be adequately managed (e.g.: any controls and mitigation measures) for each of the following situations:

- i. **Normal operations;**
- ii. **Testing and maintenance of the generators (e.g.: generator testing plan);**
- iii. **Use of the generators during emergency**

The updated Noise Impact Assessment allows for a low frequency assessment, as per EPA Publication 1996 Noise guidelines.

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Provide a contingency plan which details additional noise controls or operational measures that will be implemented if the noise level from the use once operational exceeds the calculated project noise criteria.

Contingency measures will be addressed in the updated Noise Impact Assessment and will include operational measures including limitations on generator testing, implementation of further physical barriers to the specific noise sources and modifications to chiller modes of operation.

Details of any additional controls and noise mitigation measures which might apply.

Controls and mitigations will be included in the updated Noise Impact Assessment to address noise

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levels, low frequency and tonality impacts as far as reasonably practicable. These include:

- Noise walls on datacentre buildings at roof level, around load banks and around substation transformers
- Operational limitation and physical treatment of the chillers
- Acoustic enclosures for emergency generator enclosures and load banks

Please note that the revised noise assessment will be technically reviewed by EPA once the response to the above further information request is satisfied.

Noted, the updated assessment will be provided by the end of October.

Air Emissions

An air emissions assessment, that addresses the following requirements, (prepared by a suitably qualified person) is necessary for EPA to confirm site suitability and to provide evidence that risks are understood and that mitigations have been considered and incorporated into the planning proposal.

the location of the site, types of adjacent uses, proximity to sensitive uses and separation distances.

air quality in the area (ambient air quality/assessment) and an assessment of cumulative impacts (including the Westgate Freeway and other data centres/clusters)

the design of the data centre (including size of plant, generator set up, type of generators, and their operation, other emissions sources). This assessment is to include the site power supply reliability analysis and the resulting power shedding and the corresponding generator use required for operation assessment and consideration of different scenarios (design, technology and operations) that would prevent or minimise risk of emissions from the site.

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. Emissions that may impact on sensitive receptors are generally limited to the operation of the diesel generators. When operational, these emit air pollutants, including NO_x, PM_{2.5} and CO. The assessment will identify potential impacts associated with emissions from the generators during the proposed operating scenarios:

1. Standard maintenance and testing activities associated with standby generators. This will be up to 2 generators operating for a period of up to 45 mins at different loads.
2. Emergency operation - In the event that a 220kV grid feeder is lost, half of the 214 emergency generators will operate at 85% load until the systems can be safely transferred to the operational feeder.

In the planning and design passes, the project has had regard to Clause 13.06-1S (Air quality management) and considered the potential impacts associated with air emissions to reduce potential

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how emissions have been considered in the design of the proposal and how risks have been minimised/prevented so far as reasonably practicable. This should include mitigations that have been adopted in the design and operation of the site.

impacts to the environment and human health. Sensitive receptors are documented in the Planning Report (refer Section 1.6), including nearby residential and a childcare centre. As part of early design, the following has been incorporated into the project design to minimise risks associated with air emissions, including:

- Layout has considered situating plant and emission exhausts further away from sensitive receptors, with ancillary office and front of house components are located between the exhaust stacks and sensitive receptors. Generator exhaust stacks are positioned further within the site to maximise separation distances to sensitive receptors.
- Design optimisation of exhaust emission stack heights to increase dispersion. Exhaust release points are approximately 28m high and sit above the building structure to prevent downwash. These will also be benefitted by the vertical air flow off from the chillers. This air flow would likely negate building downwash and provide additional vertical momentum both of which would promote dispersion of air emissions. Design will consider final stack heights based on the outcomes of sensitivity analysis currently being completed.
- Contingency measures to maintain grid power supply to the data centre, including 2 separate feeders that can each take 100% of the load. This will significantly reduce the likelihood of an emergency event occurring requiring all generators to operate.
- Maintenance and testing regime has been developed such that only up to 2 generators of the 214 may be tested at any one time (during business hours) to minimise emissions to air at any one period during standard testing. Testing will likely only occur 10am – 4pm each day – a period

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where atmospheric conditions generally promote dispersion.

- Back-up power generators selected 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.
- Additional measures may be considered subject to recommendations in the AQIA and as the design is further progressed - these will be outlined in the DL application.

The project is confident that with the mitigations undertaken in the schematic design that the proposal will comply with ERS air environmental values and confirm that under normal testing operations will not pose an unacceptable risk to human health or the environment. The Air Quality Impact Assessment will be submitted to EPA as part of the Development Licence application.

Groundwater and Environment Audit Requirements

Provide additional information that addresses groundwater contamination risk, including:

How the recommendations of the Environmental Audit Statement (EAO537) undertaken by Australian Environmental Auditors will be considered and implemented in this planning application.

Following the end of the previous land use, extensive soil and groundwater contamination investigations and remediation was completed via an EPA Environmental Audit which deemed the site suitable for ongoing commercial/industrial land use. Whilst residual soil and groundwater contamination does remain in the area, the extent is well understood.

To ensure correct management of residual contamination, the site is subject to the implementation of ongoing management measures outlined in the EPA-endorsed Environmental Audit

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Statement and Site Management Plan. These documents specifically recognise that groundwater beneath the site is unsuitable for extraction and use, and requires ongoing controls to manage contamination risks. They also require strict management of site works, storage of materials and any activities that could affect soil or groundwater. Green Square has additionally sought technical advice from EPA-Appointed Environmental Auditors in relation to the remaining site contamination to understand how it can be managed appropriately and its environmental obligations are met.

What additional strategies and mitigations (if any) will be included in this development application to address groundwater contamination risk during construction phase and when operational.

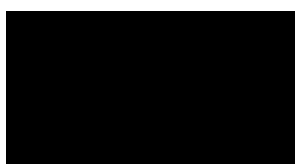
The proposed data centre will be subject to a range of environmental protection requirements designed to prevent any new contamination of soil or groundwater. This includes compliance with EPA requirements, management plans for construction and operation, and appropriate containment and handling measures for any fuels stored onsite. While historic contamination from previous industrial activities is being managed under an established EPA framework, the proposed development will be required to implement measures to prevent further contamination of soil and groundwater during both construction and operation.

We trust that the detailed responses provided herein address the matters raised through the referral process and demonstrate the project's alignment with relevant planning, design, engineering and environmental requirements.

Where further technical detail or minor amendments are required, we are agreeable to these being addressed through permit conditions.

Should you require clarification on any item, or wish to discuss specific aspects of the proposal, please do not hesitate to contact me on the details below.

Yours sincerely,



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