



10 November 2025

Patrick Copas
Principal Planning Officer
Industry Assessments
Department of Planning, Housing and Infrastructure

Dear Patrick,

RESPONSE TO ADDITIONAL SUBMISSIONS - SSD-63741210

This letter has been prepared by Urbis Ltd on behalf of NEXTDC (the **Proponent**) in response to additional comments received in relation to the proposed NEXTDC S4 Data Centre at Horsley Park (**SSD-63741210**) and the associated Amendment package.

The letter provides a formal response to comments received from the following agencies and stakeholders:

- Blacktown City Council
- Fairfield City Council
- Department of Planning, Infrastructure and Housing (DPHI)
- Public submissions

This letter is accompanied by the following additional information:

- **Attachment A:** Elevations and Floor Plan of Secondary Systems Building
- **Attachment B:** Updated Architectural Plans showing the inclusion of Battery Rooms
- **Attachment C:** Aurecon Memorandum confirming Battery Room Sizing

A detailed response to each of the matters raised in these submissions is provided in the following tables, addressing the specific issues and recommendations outlined by each authority.

Table 1 Response to Submissions

Comment	Applicant's response
Blacktown Council	
Secondary Systems Building	The proposed Secondary Systems Building (SSB) and associated secondary systems



Comment	Applicant's response
<p>The Amendment Report mentions a 'new secondary systems building' at the TransGrid Sydney West Substation site in the Blacktown LGA. The plans depict it and describe it to be a 38.76m² modular building. We request more information in order to make an informed consideration (i.e. height, location, mechanism of approval process – exempt development?) about this aspect of the development.</p>	<p>works form part of the State Significant Development Application (SSD-63741210), as described in the Amendment Report.</p> <p>The SSB is a purpose-built control and protection facility within the TransGrid Sydney West Substation that will accommodate the electrical, communications, and control systems required to safely operate and monitor the 330 kV high-voltage network.</p> <p>As shown on the External HV Plans submitted with the Amendment Report, the SSB is located along the western boundary of the TransGrid substation site.</p> <p>The SSB will be positioned on an existing concrete slab within the TransGrid substation and elevated slightly above ground level. The building is a compact, single-storey modular unit constructed of durable precast panels, designed for long-term operational resilience. It incorporates internal air-conditioning and dust-control systems to maintain stable environmental conditions for the sensitive electrical and communications equipment housed within.</p> <p>The building has a footprint of approximately 10.2 metres by 3.8 metres (38.76m²) and a total height of around 5.16 metres, comprising a 3.73-metre structure elevated 1.43 metres above ground level. The SSB is located within the secure substation compound, set back from all high-voltage equipment, and will not alter the overall appearance or operation of the existing substation.</p> <p>Further architectural details, including elevation and floor plans, are provided at Attachment A to this letter.</p>

Comment	Applicant's response
Fairfield City Council	
<p>On-site Parking</p> <p>The applicant has not provided sufficient information to demonstrate that the peak parking demands generated by the development proposal can be accommodated with the provision of 200 off-street parking spaces.</p> <p>The SSD at Kemps Creek contains 79 on-site staff members whereas, this development site is to accommodate 196 staff. The applicant shall compare the proposed development with another development that is of similar operating characteristics. This would help to justify the provision of 200 off-street parking is adequate for the site.</p>	<p>The submitted Transport Impact Assessment (TIA) demonstrates that the provision of 200 on-site parking spaces will adequately meet the demands of the proposed development. The assessment accounts for differences in staffing between the subject site and the Kemps Creek data centre by applying a parking rate based on gross floor area (GFA). This approach proportionally scales the approved parking rate at Kemps Creek to the current proposal.</p> <p>Kemps Creek provides an appropriate benchmark due to its proximity, comparable operating characteristics, and shared context within the Western Sydney Employment Area. A GFA-based comparison also provides a more stable and objective measure of parking demand, as GFA remains constant whereas staff numbers can fluctuate with operational and maintenance activities. This approach reflects the low and variable staffing levels typical of data centres, aligns with standard DCP methodologies, and allows consistent comparison across facilities of different sizes.</p> <p>Key findings of the TIA supporting the proposed parking provision include:</p> <ul style="list-style-type: none"> ▪ Application of standard DCP rates would result in an unrealistic oversupply of 881–938 spaces. ▪ The proposed 200 spaces adequately accommodate up to 196 staff, visitors, and intermittent contractors, as demonstrated in the staffing schedule and roster included in the TIA. ▪ A visitor booking system will ensure efficient use and turnover of spaces. ▪ The Kemps Creek facility provides 120 spaces for 79 staff (approximately 65,000 m² GFA).

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	<p>Applying the same GFA-based rate to the S4 site equates to 114 spaces, confirming that the proposed 200 spaces exceed this benchmark.</p> <p>Accordingly, the proposed parking provision is considered appropriate and sufficient to meet operational demands.</p>
<p>Stormwater Management</p> <p>The proposed works have been designed in accordance with the 327-335 Burley Road, Horsley Park DCP 2016. However, it is critical to note that the Permissible Site Discharge (PSD) and Site Storage Requirements (SSR) outlined in Council's Stormwater Management Policy 2017 are based on the site's existing rural land use and are therefore more conservative. These conservative standards are not arbitrary-they are designed to:</p> <ul style="list-style-type: none"> ▪ Minimise erosion risks to Reedy Creek and other downstream waterways. ▪ Reduce flood impacts on vulnerable downstream communities. <p>Importantly, the site lies within the Hawkesbury-Nepean catchment, which was designated as a high-risk catchment in the NSW Flood Inquiry 2022. This designation highlights the need for robust flood mitigation and water-sensitive urban design practices.</p> <p>Given these factors, Council officer maintain that Council's Stormwater Management Policy 2017 must take precedence over the site-specific DCP. Adherence to this policy is essential to safeguard environmental integrity and community resilience in a high-risk flood catchment.</p>	<p>This matter will be addressed through the Department's standard conditions of consent, which require that the detailed design of the stormwater management system be finalised in consultation with Fairfield City Council and in accordance with relevant local and Australian standards. This includes Council's Stormwater Management Policy 2017, Australian Rainfall and Runoff (Engineers Australia, 2019), and the Managing Urban Stormwater: Council Handbook (EPA, 1997).</p> <p>These conditions ensure the final system will provide appropriate capacity, water quality, and downstream protection outcomes consistent with best-practice stormwater management within the Hawkesbury-Nepean catchment.</p>



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<p>Air quality</p> <p>Council Officers recommend that the consent authority engage an independent qualified, experienced and certified consultant to review Air Quality Impact Assessment prepared by Northstar Air Quality Pty Ltd, dated 5 June 2024, Report REF:24.1064.fr3v1, to ensure the report is sufficient in demonstrating that the proposed development will not have an adverse or accumulative impact on air quality and odour, on receivers. This review should also determine if any mitigation or pollution control equipment can be installed to reduce air pollutants to a complaint level.</p> <p>Under all the predicted worst-case scenarios, the consultant has indicated that a number of additional exceedances of the short-term air quality criteria for PM 10, PM2.5 and NO2 are predicted to occur. The report indicates that the proposal will generate exceedances, and Council has concerns that the proposal will affect nearby receivers.</p> <p>The consultant has stated that the use of all generators at the one time would be an unlikely occurrence. However, it must be noted that the operation of all diesel generators can occur and if it does occur, air quality exceedances will occur at receivers as a result. If the diesel generators are to be used for a short period of time as reported on within the report, then a condition should be placed on the consent limiting the length of time the generators are to be used to be in line with what has been reported.</p>	<p>The Air Quality Impact Assessment (AQIA) prepared by Northstar was reviewed by the EPA, who confirmed that outstanding matters can be appropriately addressed through standard conditions of consent and the subsequent Environment Protection Licence (EPL). This includes the Council's request for an independent review of the AQIA, which the Department and EPA have confirmed can be managed through a condition of consent rather than requiring a separate response at this stage.</p> <p>In accordance with the Department's advice, reference is made to the EPA's recommendations and the Department's standard conditions applied to other data centre approvals, which limit the operation of back-up generators. These conditions typically require that generator operation (including testing) not exceed 200 hours per year, no more than three generators be tested concurrently, and only one generator per bank be tested at a time.</p> <p>These standard conditions ensure generator use remains consistent with the assumptions of the AQIA and that potential air quality impacts are appropriately managed through the consent and subsequent EPL process.</p>
Department of Planning, Infrastructure and Housing	
Battery Rooms	Relevant plans have been updated to show the location of the Battery Rooms within the

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<p>It is noted that the PHA has been updated to reflect the updated diesel storage/usages and lithium-ion batteries. However, the information provided in the PHA and the Architectural Plans do not provide the location of the battery rooms.</p> <p>Given the above, it would be appreciated if your hazards consultant could provide additional information to confirm the location of the battery room, along with confirmation that the proposed buildings can host the numbers of batteries within the buildings.</p>	<p>development. The updated SSDA drawings (Attachment B) show the location of the Battery Rooms at Ground Level in Buildings A&B and Buildings C&D, now clearly labelled as "Battery Room."</p> <p>A memorandum has also been prepared by Aurecon (Attachment C) which confirms that the spatial allocation of each Battery Room is sufficient to accommodate the proposed quantity of lithium-ion battery racks and associated clearances in accordance with the updated PHA and design requirements.</p>
Public Submissions	
<p>Submission 1</p> <p>Concerns include noise from extraction fans (particularly at night), heat generation during summer, bushfire risk, visual bulk from numerous fan towers, and light spill attracting insects and affecting amenity. Suggests the data centre be built below the retaining wall with exhaust air vented underground to minimise impacts. Also questions the limited employment benefits and references broader concerns about data centre pollution.</p>	<p>The amended proposal reduces off-site amenity impacts by consolidating buildings, removing the former Building D on the north-east, modestly lowering maximum height, and strengthening landscape buffers along sensitive boundaries to screen views to rooftop plant and reduce perceived bulk.</p> <p>Operational noise from plant, including fans, is managed through equipment siting, enclosure and acoustic treatments identified in the updated assessments, with compliance at nearby residences including at night. External lighting is designed and oriented to limit spill toward dwellings, and the increased edge landscaping further reduces night-time effects, including attraction of insects.</p> <p>Bushfire risk is addressed through compliant asset-protection distances, appropriate BAL construction, perimeter emergency access and dedicated on-site firefighting water. Heat from mechanical exhausts is managed by the building services design so that normal</p>



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	<p>operation does not give rise to material amenity impacts at receivers.</p> <p>On the suggestion to place the facility below the retaining wall and vent exhaust underground, the amended layout and integrated acoustic, lighting and landscape measures achieve the intended amenity outcomes without requiring underground exhaust infrastructure.</p> <p>The proposal will provide positive construction and ongoing operational employment outcomes and broader economic benefits consistent with the strategic role of the precinct.</p>
<p>Submission 2</p> <p>Raises concerns about continuous noise from a 24-hour facility, light pollution reducing wildlife habitat, and traffic safety on Burley Road due to increased vehicle movements and poor sightlines. Questions the value of conducting a noise assessment post-completion. Requests that noise- and light-emitting equipment face west (away from residences), floodlights be directed away from dwellings, and that road safety measures (signage, line-marking) be introduced. Also expresses concern over loss of rural character, habitat loss, and cumulative environmental impacts.</p>	<p>The amended proposal maintains a low-intensity operational profile typical of hyperscale data centres, with limited on-site staff and minimal external activity. Operational noise will be managed through the siting and enclosure of plant, use of acoustic barriers, and attenuation measures that ensure compliance with relevant noise criteria at the nearest sensitive receivers. Lighting has been refined through the use of directional and shielded fittings, together with enhanced landscape screening along the eastern boundary, to reduce potential light spill and protect nearby residential amenity and local fauna.</p> <p>Traffic and safety concerns along Burley Road have been addressed through the updated Traffic Impact Assessment and Construction Traffic Management Plan. All construction and operational access will occur via Johnston Crescent, with direct haul routes to the M4 and M7 motorways to avoid residential streets. The CTMP provides for on-site queuing, parking and delivery management, along with appropriate signage and traffic control</p>



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	<p>measures to ensure safe and efficient vehicle movement during all stages of the project.</p> <p>These refinements collectively reduce potential amenity, lighting and traffic impacts, preserve the rural interface through increased landscaping, and ensure the development can operate safely and efficiently within its industrial context.</p>
<p>Submission 3</p> <p>Seeks clarification regarding the building height (39 m) and whether the development remains below the residential ground level as previously indicated. Raises concerns about noise and light impacts, particularly at night, and requests plans showing the building relative to the excavated level. Questions whether approval of tall structures would set a precedent for high-rise development in Horsley Park. Emphasises the importance of noise and lighting mitigation for adjoining residences.</p>	<p>The amended proposal slightly reduces the overall maximum height and consolidates the layout to provide greater setbacks and separation from nearby residences. The removal of Building D enables additional landscaping and screening along the eastern boundary, reducing the visual presence of the development and softening the transition to the surrounding rural environment. Updated elevations and sections illustrate the relationship between finished ground levels and the adjoining terrain, confirming that the buildings will sit largely below the neighbouring residential ridgeline.</p> <p>Noise and lighting impacts have been addressed through the orientation and enclosure of plant equipment, the use of acoustic treatments, and refined lighting design using directional and shielded fittings to limit light spill beyond the site boundary. These measures ensure that the development will not result in unacceptable night-time impacts on nearby residences.</p> <p>The proposal does not set a precedent for taller or more intensive development in Horsley Park. It has been assessed as a State Significant Development due to its strategic role and infrastructure function, and its form, scale, and design have been specifically tailored to this site's industrial zoning, buffer distances, and</p>

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	<p>surrounding context. Future developments within the locality will remain subject to their own site-specific assessment under the applicable planning controls.</p>
<p>Submission 4</p> <p>Raises concerns regarding the height and visual scale of the proposed buildings. Identifies concerns relating to heat and exhaust emissions in a bushfire-prone area, noise, lighting, air pollution, loss of privacy, and impacts on the rural character of Horsley Park. States residents were previously advised the development would be below ground level and “barely visible.” Requests that buildings be below existing ground level, lighting be controlled, noise and exhaust emissions minimised, and the rural environment protected.</p>	<p>The amended proposal reduces overall height and visual scale through consolidation of buildings, removal of Building D, and an improved site layout that provides greater setbacks and enhanced landscaping along the eastern boundary. These refinements substantially reduce visual bulk and improve screening to nearby residences, addressing concerns about height, privacy, and the development’s visual relationship with the surrounding rural landscape.</p> <p>Operational noise and lighting impacts have been addressed through the enclosure and orientation of plant equipment, implementation of acoustic treatments, and a refined lighting strategy using shielded and directional fittings to minimise light spill beyond the site. The result is a more contained and subdued operational profile that protects night-time amenity.</p> <p>Heat and exhaust emissions are effectively managed through the mechanical design of the facility, which incorporates modern, energy-efficient systems that comply with applicable environmental standards. The bushfire assessment confirms that the site design meets the requirements of Planning for Bushfire Protection 2019, with substantial asset protection zones, BAL-compliant construction, perimeter emergency access and dedicated firefighting water supply.</p> <p>Overall, the amended proposal achieves a more integrated and context-sensitive built form that mitigates off-site amenity impacts,</p>



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	manages environmental risks, and maintains the rural character and landscape quality of Horsley Park.

Revised Project Staging

NEXTDC proposes a minor amendment to the previously outlined construction staging to ensure the draft conditions of consent accurately reflect the intended sequencing of works. The revised staging arrangement is set out below:

Table 2 Revised Project Staging

Construction Activity	Duration
Stage 1 Building C and D, HV switching building, 330kV substation, HV external cabling route, entrance to site, centralised security office and water tanks.	24 months
Stage 2 Building A	12 months
Stage 3 Building B	12 months

To facilitate practical delivery of the project, it is requested that the wording of the staging-related conditions of consent not be overly prescriptive (for example, referencing a Construction Certificate rather than *the* Construction Certificate). This approach will provide the Principal Certifying Authority with appropriate flexibility to manage any minor adjustments to the staging or issue separate Construction Certificates as required.

We trust this information addresses the additional comments raised by the Department and relevant stakeholders. Please do not hesitate to contact the undersigned should any further clarification or information be required to assist in finalising the assessment.

Kind regards,

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