

Operational Environmental Management Plan

Project Echidna – SSD47320208

Reference: 288255-24

Final | 15 October 2025



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1. Introduction

A State Significant Development approval SSD-47320208 (the Development Consent) was granted by the NSW Independent Planning Commission for the construction and operation of a two-storey hyperscale data centre (DC) at 10 Eastern Creek Drive, Eastern Creek (the Project). This approval authorises the operation of a facility with an operational capacity of up to 35.2 megawatts, addressing the increasing demand for reliable, secure digital infrastructure in the Sydney metropolitan region. The data centre comprises data halls, administrative offices, mechanical and electrical equipment rooms, and associated ancillary infrastructure, including backup power systems and on-site utilities.

This Operational Environmental Management Plan (OEMP) has been prepared by Arup in accordance with the Minister's Conditions of Approval, the mitigation measures outlined in the Environmental Impact Statement (EIS), and all relevant legislative and regulatory requirements. The OEMP provides the framework for environmental management and compliance throughout the operational phase of the data centre. It details the procedures and controls to minimise and manage potential impacts on air quality, noise, water, soils, waste, traffic, biodiversity, and community amenity, as well as requirements for monitoring, reporting, and continuous improvement in line with the SSD consent.

Operation of the DC is anticipated to commence in 2026, following completion of construction and commissioning. This OEMP applies to all operational activities, including 24/7 data centre operations, routine maintenance, emergency response (such as backup generator deployment), and general site management. The OEMP will be updated as required to ensure continued compliance with approval conditions, evolving best practice, and any changes in operational procedures. Any substantial modifications will trigger a review and, if required, formal revision of this OEMP in consultation with the NSW Department of Planning, Housing and Infrastructure (DPHI).

1.1 Purpose

This OEMP has been prepared to address the requirements of the Minister's Conditions of Approval (MCoA) for the Project, as detailed in Table 1-1. The OEMP outlines how the Site Operator (SO) will meet these conditions throughout the operational phase of the facility.

DPHI will be notified of the commencement of operation and of any subsequent operational stages, as required by the Conditions of Approval.

This document sets out the environmental management framework, procedures, and monitoring requirements to ensure compliance with MCoA. It details how the operational activities of the DC will minimise environmental impacts, manage risks, and ensure protection of the surrounding environment and community. The OEMP will be reviewed and updated as necessary, in accordance with the consent conditions and in response to any significant changes in operations or relevant legislation.

The below table summarises the relevant MCoA addressed by this OEMP and where they are documented.

Table 1-1. Minister's Conditions of Approval (MCoA)

Condition	Requirement	Section
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	
	(a) detailed baseline data;	Section 3.4
	(b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Section 3 Section 6 Section 7
	(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 3
	(d) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 7 Section 6
	(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 6
	(f) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 8.2
	(g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and	Section 8.1
	(h) a protocol for periodic review of the plan.	Section 8.2
C5	The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	This OEMP
C6	As part of the OEMP required under condition C5 of this consent, the Applicant must include the following:	
	(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 5
	(b) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; NSW Government 16 Project Echidna Data Centre Department of Planning, Housing and Infrastructure (SSD-47320208) (iv) respond to any non-compliance; (v) respond to emergencies; and	Section 4
	(c) include the following environmental management plans: (i) copy of Workplace Travel Plan (see condition B23); and (ii) Landscaping (see condition B44)	Section 5
C7	The Applicant must: (a) not commence operation until the OEMP is approved by the Planning Secretary; and (b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time)	The OEMP forms the ongoing operational basis for environmental management at the facility.

1.2 Scope and objectives

This OEMP provides an overview of the potential environmental impacts associated with the operational phase of the Project. It describes the management and mitigation measures that will be implemented to protect the environment and sensitive receivers and outlines how potential adverse environmental impacts will be minimised during ongoing operations.

Operation of the Project must be carried out in accordance with this OEMP, which has been developed to satisfy the requirements of the Development Consent and must be approved by the NSW Planning Secretary prior to the commencement of operations.

The objectives of this OEMP are to:

- Provide an overview of the operational activities and processes at the Data Centre
- Describe the relevant legislation, policies, guidelines, and standards that guide environmental management for the facility
- Identify key operational environmental management issues and associated risks
- Provide a framework for implementing appropriate mitigation and management measures for key environmental issues, with reference to detailed subplans in the appendices
- Serve as a practical environmental management tool for use during the operational stage of the data centre
- Define the roles and responsibilities of personnel, contractors, and other stakeholders involved in operational management
- Guide interactions with relevant Government authorities and other stakeholders, including the local community
- Set out standard operating procedures for managing the site and addressing key environmental issues
- Establish the basis for monitoring, reporting, and demonstrating ongoing compliance with approval conditions and legislative requirements.

As a living document, the OEMP will undergo regular review, and its management strategies and control measures will be updated as necessary. These revisions will reflect changes in operational activities, site-specific outcomes, non-conformities, and insights gained from inspections, meetings, audits, and regulatory feedback.

This version of the OEMP addresses the requirements for the operational phase of the DC will be updated as needed in response to any significant changes in operations or relevant legislation.

1.3 Supporting documentation

Several supporting management plans and documents have been developed to underpin OEMP for the Project. These plans provide the detailed procedures and measures to ensure ongoing environmental compliance during operations. Key documents and plans include:

- Workplace Travel Plan (WTP)
- Landscape Management Plan (LMP)

1.4 Consultation and notification

To ensure compliance with the planning conditions throughout this operational phase of the DC, both the OEMP and its supporting subplans have been informed by consultation with relevant government agencies. As outlined in Table 1-2, this consultation process addressed specific requirements for the preparation and approval of the OEMP and its subplans for the operational stage of the data centre. Table 1-2 details the key agency requirements and consultation undertaken to ensure all operational management plans align with statutory and regulatory expectations.

Table 1-2. Operational Notification and Approval Requirements

Condition	Requirement	Plan	Relevant agency	Comment
A9	The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary: (a) construction; (b) operation; and NSW Government 6 Project Echidna Data Centre Department of Planning, Housing and Infrastructure (SSD-47320208) (c) cessation of operations.	-	DPHI	Notify DPHI of the commencement of operations in accordance with Condition A9.
A10	If the construction, operation or cessation of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.	-	DPHI	No staging is proposed for the operational phase of the project.
A17	Prior to the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	Compliance certificate	Sydney Water	S73 Sydney Water Compliance Certificate has been issued.
B5	Prior to the commencement of operation of the development, the Applicant must prepare a Nitrogen Dioxide Monitoring Procedure (NDMP) to the satisfaction of the Planning Secretary. The NDMP must: (a) be prepared by a suitably qualified and experienced person(s); (b) identify the contemporary impact assessment criteria for nitrogen dioxide emissions; (c) describe the control measures which would be implemented to minimise the duration of each power outage event; (d) outline the monitoring procedure which would be implemented during each power outage event, in accordance with the most recent version of the Approved Methods for the sampling and analysis of air pollutants in NSW (EPA, 2022); and (e) described the management actions which would be taken to address any exceedances of the impact assessment criteria identified in condition B5(b).	NDMP	DPHI	The NDMP has been prepared and approved by DPHI on 14/02/25.
B6	The Applicant must: (a) not commence operation until the NDMP (see condition B5) is approved by the Planning Secretary; and (b) implement the most recent version of the NDMP approved by the Planning Secretary for the duration of the development.	NDMP	DPHI	The NDMP has been prepared and approved by DPHI on 14/02/25.
B7	Prior to the commencement of operation, the Applicant must prepare a Power Outage Notification Protocol (PONP) for the development. The PONP must: (a) identify the neighbouring properties which would be notified should a power outage event last 30 minutes or more; (b) identify the trigger point(s) for notifying neighbouring properties that the back-up generator system is operating; and	PONP	DPHI	The PONP has been prepared and submitted to DPHI.

Condition	Requirement	Plan	Relevant agency	Comment
	(c) detail how these properties would be made aware that the development's back-up generator system is required to operate for the duration of the power outage event.			
B8	The Applicant must: (a) not commence operation until the PONP (see condition B7) is submitted to the Planning Secretary; and (b) implement the most recent version of the PONP submitted to the Planning Secretary during power outage events which last 30 minutes or more.	PONP	DPHI	The PONP has been prepared and submitted to DPHI.
B16	Within three months of the commencement of full operation of the development (described in the EIS as being when all data storage equipment and associated infrastructure is in place and operating), or as otherwise directed by the Planning Secretary, the Applicant must prepare and submit a noise verification report for the development. The noise verification report must: (a) be prepared to the satisfaction of the Planning Secretary by a suitably qualified acoustic consultant; (b) demonstrate that noise verification has been carried out by a suitably qualified and experienced acoustic consultant in accordance with the latest version of: (i) AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018); and (ii) Approved Methods for the Measurement and Analysis of Environmental Noise in NSW (EPA, 2022); and (c) include: (i) an analysis of the development's compliance with the noise limits specified in condition B14; (ii) an outline of management actions to be taken to address circumstances where the noise limits specified in condition B14 are exceeded; and (iii) a description of contingency measures in the event management actions are not effective in reducing noise levels to an acceptable level.	Noise verification report	DPHI	Will be undertaken within three months of commencement of full operation of the development.
B23	Prior to the commencement of operation of any part of the development, the Applicant must prepare a Work Place Travel Plan to encourage the use of sustainable and active transport options by operational staff. The Plan must be included in the OEMP required by condition C5 and must: (a) be prepared in consultation with TfNSW; (b) outline facilities and measures to promote public transport usage, such as car share schemes and employee incentives; and (c) describe pedestrian and bicycle linkages and end of trip facilities available on-site.	Workplace Travel Plan	TfNSW	The WTP has been prepared in consultation with TfNSW. Refer to Appendix A.
B24	The Applicant must: (a) not commence operation until the Work Place Travel Plan is submitted to the Planning Secretary; and (b) implement the most recent version of the Work Place Travel Plan approved by the Planning Secretary for the duration of the development.	Workplace Travel Plan	DPHI	The WTP is attached as Appendix A.

Condition	Requirement	Plan	Relevant agency	Comment
B30	Prior to the commencement of operation, the Applicant must install the stormwater management system in accordance with the finalised detailed design (as required by condition B29) and ensure the system is operational.	As built design and certificates		SW System has been installed, verified and is now operational.
B44	Prior to the commencement of operation of the development, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Planning Secretary. The plan must form part of an OEMP in accordance with condition C5. The plan must: (a) be prepared in consultation with Council; (b) detail the species to be planted; (c) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and (d) be generally consistent with: (i) the Landscape Plans and Landscape Screening provided in the Additional Response to Submissions (ii) the Applicant's Management and Mitigation Measures at Appendix 2	Landscape Management Plan	DPHI	The LMP has been prepared in consultation with Camden Council. Refer to Appendix B.
B45	The Applicant must: (a) not commence operation until the Landscape Management Plan is approved by the Planning Secretary. (b) must implement the most recent version of the Landscape Management Plan approved by the Planning Secretary; and (c) maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition B45 for the life of the development.	Landscape Management Plan	DPHI	The LMP is attached as Appendix B.

2. Operational Overview

2.1 Site context

The Project is located at 10 Eastern Creek Drive, Eastern Creek (refer to Figure 2-1 below), within the Western Sydney Employment Area. The site occupies Lot 4001 DP 1243178 and is surrounded by industrial and infrastructure-related developments. The centre operates within a broader precinct planned for high-technology and logistics uses. The site is flat, sealed, and landscaped, and lies over 1.5 km from the nearest residential receptors.

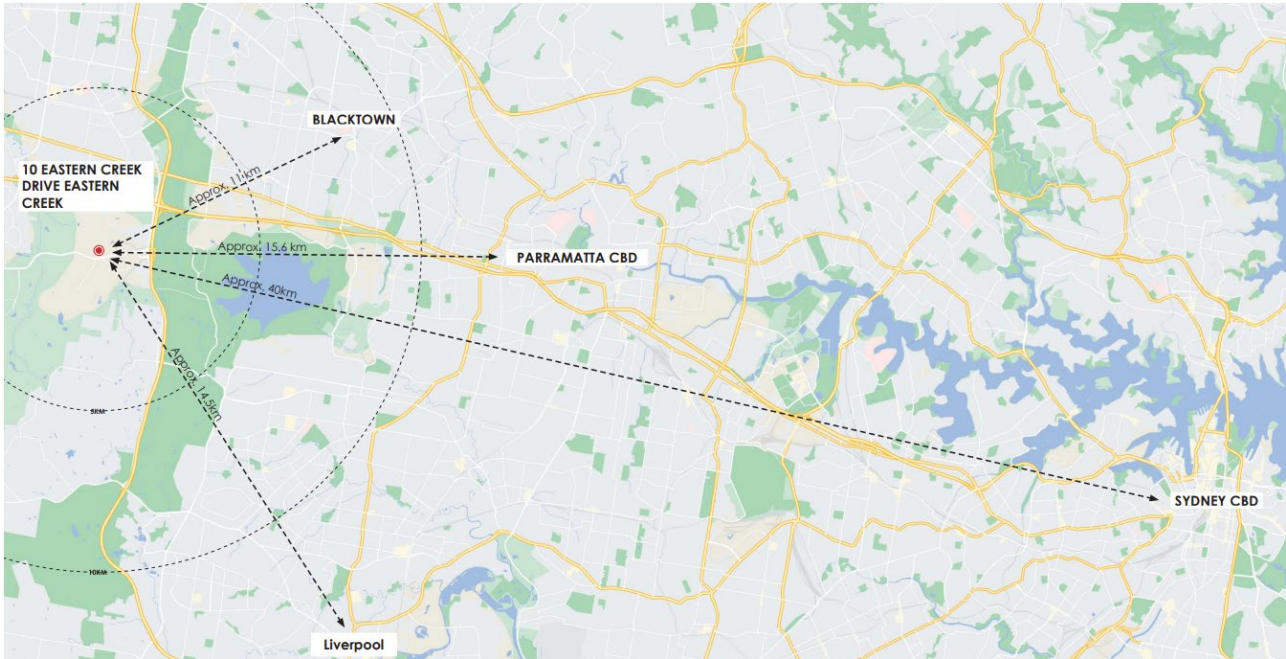


Figure 2-1. Site Location

2.2 Operational activities

The facility operates continuously, 24 hours per day, seven days a week, providing data centre services such as cloud-based storage and computing infrastructure. Key operational activities include:

- Continuous operation of IT systems and associated infrastructure, including HVAC, power distribution, and fire protection systems
- Routine testing and maintenance of diesel-powered emergency backup generators, limited to a maximum of 200 hours per year, in compliance with SSD Condition A7
- Ongoing management and maintenance of critical building systems, including electrical, mechanical, communications, and fire safety systems
- Implementation of on-site security and access control, including 24/7 surveillance
- General site maintenance, including landscaping, waste management, and stormwater infrastructure upkeep
- Administrative and facility management tasks, including the coordination of deliveries and contractor access.

2.3 Hours of operation

Operational activities at the DC are permitted 24 hours per day, 7 days a week, in accordance with Condition B9 of the Development Consent. This includes all routine site operations, facility management, security, maintenance, and IT infrastructure functions. However, testing of backup generators is restricted to standard

3. Planning

Operation of the DC must comply with all relevant legislation, permits, licences, and development approvals applicable to the facility. This section provides an overview of the environmental planning and statutory context for the data centre's operations, ensuring alignment with the applicable regulatory and corporate environmental policies.

3.1 Development approval

The planning approvals process for the DC, Echidna Data Centre at 10 Eastern Creek Drive, Eastern Creek, has involved several local and State approvals over recent years. Initial consents were issued by Blacktown City Council, including DA-18-00196 (subdivision, June 2018), DA-18-00938 (bulk earthworks, December 2018), and DA-20-01387 (temporary electricity kiosks, December 2020). The site also received approval for construction of a substation under DA-22-01312 in March 2023. Importantly, a concept approval for the data centre (Stage 1 and Stage 2 buildings, and substation) was granted by the Sydney Central City Planning Panel under SPP-19-00013 on 6 May 2020, with a subsequent modification (MOD-21-00447, December 2021) to allow for microscale data centre staging, a reduction in the future substation size, and additional car parking.

The Development Consent was assessed as State significant development under section 4.36 of the Environmental Planning and Assessment Act 1979, as the proposal exceeded the 15 MW power consumption threshold. The application was publicly exhibited from 8 June to 5 July 2023, with input from government agencies and Council. Blacktown City Council initially objected (raising concerns about consistency with earlier approvals, landscaping, car parking, and visual screening), but formally withdrew its objection on 19 March 2024 following design revisions and additional information provided by the applicant.

On 5 April 2024, the Development Consent was granted by the Independent Planning Commission (under delegation), reflecting the project's alignment with NSW Government policies and its effective management of environmental and community impacts. The process demonstrates strong stakeholder engagement, iterative design improvements, and compliance with both statutory and strategic planning frameworks. The project is expected to deliver significant investment (\$380 million) and employment benefits for Western Sydney, with construction scheduled for completion by 2026.

3.2 Relevant regulatory instruments

Table 3-1 below outlines the key regulatory instruments applicable to the Project.

Table 3-1. Relevant regulatory instruments

Regulatory Instrument	Relevance to the Project
Environmental Planning and Assessment Act 1979 (NSW)	Primary planning legislation under which SSD-47320208 was granted. Governs planning assessment, consent conditions, modifications, and enforcement.
Environmental Planning and Assessment Regulation 2000 (NSW)	Supports the EP&A Act by setting out the requirements for management plan content, compliance monitoring, and approvals.
Protection of the Environment Operations Act 1997 (NSW)	Governs pollution control during operations, including air, noise, water, and waste. Applies to generator emissions, stormwater, and environmental incidents.
Protection of the Environment Operations (Clean Air) Regulation 2022	Details emission limits and air quality requirements relevant to diesel generator operation and NO ₂ monitoring.
NSW Noise Policy for Industry (2017)	Establishes noise limits and impact assessment criteria for ongoing operations, aligned with the noise verification report.
Contaminated Land Management Act 1997 (NSW)	Governs obligations in the event of discovering contaminated soil or groundwater during maintenance activities.
Sydney Water Act 1994	Requires a Section 73 Certificate for ongoing water and sewerage infrastructure servicing the site.

Regulatory Instrument	Relevance to the Project
Biosecurity Act 2015 (NSW)	Guides vegetation maintenance, weed control, and landscape pest management across the data centre site.
Plastic Reduction and Circular Economy Act 2021 (NSW)	Supports operational waste reduction and recycling strategies in line with sustainability targets.
Government Resource Efficiency Policy (GREP) 2019 (NSW)	Applies to government or publicly funded infrastructure, promoting efficient energy, water, and materials use, relevant to the SO's sustainability goals.
Work Health and Safety Act 2011 (NSW)	Establishes legal duties for the health and safety of all workers and contractors during operations and maintenance.
Environment Protection and Biodiversity Conservation Act 1999 (Cth)	Commonwealth legislation, applies only if changes to the site trigger a significant impact on Matters of National Environmental Significance.

Table 3-2 below outlines the key regulatory guidelines applicable to the Project.

Table 3-2. Relevant guidelines

Guideline / Standard	Relevance to the Project
NSW EPA Waste Classification Guidelines – Part 1: Classifying Waste (2014)	Mandatory for correct classification, storage, and disposal of operational waste streams (general, scheduled, e-waste).
NSW EPA Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (2022)	Sets technical standards for NO ₂ monitoring as required under the NDMP.
NSW Noise Policy for Industry – Fact Sheet C	Details post-construction noise compliance methods and verification requirements.
AS 1055.1:2018 – Acoustics: Description and Measurement of Environmental Noise	Required standard for the preparation of the post-operation noise verification report.
NSW Water Quality Objectives (EPA, 2006)	Inform stormwater discharge monitoring and maintenance of any water-sensitive infrastructure.
Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom, 2004)	Guides erosion and sediment control during any operational maintenance involving ground disturbance.
Guidelines on the Duty to Report Contamination (EPA, 2015)	Establishes reporting obligations under the CLM Act for any pollution or contamination incidents.
National Environment Protection Measure (Ambient Air Quality NEPM)	Provides ambient air quality benchmarks relevant to assessing NO ₂ or particulate impacts from generator use.

3.3 Baseline environmental data

Baseline environmental data used to inform this OEMP is sourced from the approved Environmental Impact Statement (EIS) and its appendices. This data provides a reference point for monitoring environmental performance during operation:

- **Noise** – Background noise levels established in Appendix H (Noise and Vibration Assessment) are used to benchmark operational noise limits.
- **Air Quality** – Baseline concentrations and meteorological conditions from Appendix J (Air Quality Report) inform air quality risk assessments and generator testing protocols.
- **Traffic and Transport** – Existing traffic volumes and network performance in Appendix I underpin traffic impact monitoring and delivery scheduling.

- **Stormwater and Flooding** –Pre-development drainage conditions, runoff volumes, and overland flow paths are outlined in Appendix Q (Stormwater and Flooding Report).
- **Waste Generation** – Operational waste estimates in Appendix P guide bin sizing, collection frequency, and resource recovery targets.
- **Utilities** – Predicted water, sewer, and power demand (Appendices C and E) support performance tracking against infrastructure capacity.
- **Social Context** – Community receptors and visual sensitivities are summarised in Appendix M (Social Impact Assessment) and Appendix E (Mitigation Measures Summary).
- **Soil and Groundwater** – Appendix K (Geotechnical Study) provides information on soil classification, contamination risk, and groundwater levels across the site.
- **Biodiversity** – Appendix F (BDAR Waiver) confirms absence of threatened species or critical habitat on-site, setting the baseline for no net loss.
- **Visual and Landscape** – Appendix X (Visual Impact Assessment) and Appendix S (Landscape Plan) document the existing visual character and proposed mitigation zones.
- **Utilities and Services** –Appendix R (Infrastructure Requirements Report) describes the capacity and existing load of services (electricity, water, sewer).
- **Greenhouse Gas Emissions and Resource Use** –Appendix O (ESD and GHG Report) provides benchmarks for predicted electricity use, water consumption, and emissions intensity under normal operation.

This baseline data supports monitoring programs and informs performance criteria outlined in Section 6 and Section 7 of this OEMP.

4. Communication protocol

Effective communication with the community, relevant stakeholders, and regulatory authorities is a key component of the operational environmental management of the Project. This section outlines the procedures for community and agency notification, complaints handling, and associated responsibilities in accordance with Condition C6(b)(i)-(iii) of the Development Consent.

4.1 Community and stakeholder communication

In accordance with Condition C6(b)(i) of the Development Consent and the consultation commitments made in the EIS (Section 7 and Appendix H), the Project will implement measures to inform the local community and relevant agencies about the operational and environmental performance of the data centre. The following actions will be undertaken:

- Maintaining a dedicated webpage (hosted by the tenant or operator) to provide key environmental documentation, operational updates, and ongoing communications
- Providing notification to neighbouring properties and agencies in the event of scheduled maintenance, emergency events, or significant operational changes that could impact offsite receptors (as referenced in the EIS mitigation measures and Condition B7)
- Consulting directly with the DPHI, Blacktown City Council (BCC), or other agencies where compliance, incident response, or regulatory engagement is required.

These actions align with the EIS's commitment to proactive stakeholder engagement and ensure the development remains consistent with Condition C6(b)(i).

4.2 Complaints response and dispute resolution

The Project will maintain a formal system for managing and responding to community complaints in accordance with Condition C6(b)(ii)-(iii). This includes:

- Keeping a complaints register with details of:
 - Date and time of complaint
 - Complainant's name and contact details (where provided)
 - Nature of the complaint
 - Actions taken and timeline for resolution
 - Follow-up communication or resolution status
 - Acknowledging all complaints within 24 hours and aiming to resolve or respond within 7 working days.

Dispute resolution procedures will follow an internal escalation process within the site management team. Where resolution cannot be achieved through internal processes, matters may be referred to DPHI or BCC for independent advice or mediation, depending on the nature of the issue.

5. Environmental management

This section outlines the overarching framework that governs how environmental management will be implemented during the operation of the Project describes the roles and responsibilities, document control, and ongoing review processes that ensure continued compliance with the EIS, the approved conditions of the Development Consent, and relevant legislation.

5.1 Environmental management system

The operations of this project will be governed by this OEMP.

5.2 Environmental policy

We have designed the Environmental Management Program (EMP) to align with our broader corporate leadership principle that Success and Scale Bring Broad Responsibility. Environmental excellence is a fundamental component of our overall business strategy and key to the company's long-term success. The intent of our Environmental Policy is to reflect our commitment to sustainable and environmentally responsible business practices, complying with all applicable environmental obligations, evaluating our performance relative to these obligations, and finding opportunities to enhance that performance.

We will:

- Comply with environmental laws, regulations, and voluntary commitments applicable to our activities in order to protect the natural environment and prevent pollution
- Maintain a risk-based EMP that drives consistent, cost-effective, and continually improving environmental programs that drive environmental performance for our operations
- Integrate environmental considerations into our core business processes
- Monitor and evaluate environmental performance against established objectives
- Provide resources to implement, monitor, and maintain the EMP, including associated environmental objectives, and
- Track EMP implementation and performance results and recognise and celebrate success.

The above Policy is implemented in concert with the guiding principles of our Code of Business Conduct and Ethics, which applies to all our employees. All employees must understand their responsibility to incorporate compliance and other commitments into their day-to-day work activities and decision-making. This policy is available to external parties upon reasonable request to the EMS Core Team.

5.3 Roles and responsibilities

The operation of the DC will be supported by the SO's team members, as detailed in the table below.

Table 5-1: Roles and responsibilities

Role	Responsibility
Data Centre Engineering Operations (DCEO):	• Operate and manage the data center including site security, inspection, coordination of repairs and maintenance, and emergency and incident management. • Manage the site in accordance with the Operational Environmental Management Plan (this document) • Manage community complaints or enquiries with support from InCommunities team and relevant subject matter experts.
Data Center Environmental (DCE)	• Support the operations team to ensure compliance with environmental permit conditions and environmental management best practice, undertake environmental inspections and audits, environmental monitoring. • Develop, review, publish, and maintain local documentation and training in line with compliance obligations and risks.

Role	Responsibility
	• Develop and maintain spill/emergency response documentation. • Inform business partners of compliance obligations and environmental responsibilities. • Support the management of community environmental complaints or enquiries.
InCommunities (IC)	• Support the management of community complaints or enquiries in conjunction with Data Centre Engineering Operations and relevant subject matter experts.

5.4 Training and induction

All personnel involved in the operation of the data centre will be required to complete general environmental awareness training as part of their site induction, with periodic refresher sessions as required. This training will be tailored to individual roles and responsibilities and updated as needed. It may cover the following topics:

- An overview of the DC's environmental obligations and compliance requirements
- Key environmental risks and issues identified in Section 6 of this OEMP
- Environmental control measures applicable to operational activities (e.g. air quality, water, noise, waste)
- Roles and responsibilities within the OEMP
- A summary of relevant environmental subplans and procedures
- Incident response procedures, including notification and corrective actions (see Section 7 and 8)
- Legislative requirements under Section 3.2 of this OEMP
- Specific modules such as Environmental Awareness and Environmental Management Programme (EMP), General Waste Awareness, Hazardous Waste, Spill Response, Internal Spill Notification, and Wastewater Management.

Short-term contractors will either be inducted or supervised depending on the nature and duration of their work, to ensure they understand and adhere to relevant environmental requirements.

5.5 Incident management, reporting and investigation

In the event of an environmental incident during the operational phase of the DC, the SO will ensure compliance with the relevant provisions of the *Protection of the Environment Operations Act 1997* (NSW). This includes promptly notifying the NSW EPA and DPHI, where applicable, in line with regulatory requirements.

The SO will take responsibility for managing the incident, with support from qualified personnel and external specialists if needed, to contain the incident, minimise environmental harm, and protect surrounding land, water, and air quality. All incidents will be investigated in accordance with the Site Operator's Global Incident Reporting and Investigation Policy to identify the root cause and implement corrective and preventative actions.

Contractors operating on-site must also comply with the SO's incident reporting and response procedures.

5.5.1 DPFI

5.5.1.1 *Written Incident Notification:*

In accordance with Condition C10 and Appendix 4 of the Development Consent, the SO must notify the Planning Secretary of any incident via the Major Projects website immediately upon becoming aware, followed by a written notification within seven days.

Written notification immediately after the SO becomes aware of an incident must:

- (a) identify the development, including the development application number and the name of the development (i.e. SSD-47320208 for Project Echidna Data Centre Eastern Creek), and
- (b) set out the location and nature of the incident.

Following the initial written notification above, written notification must also be provided within seven days after the SO becomes aware of an incident and must:

- (a) identify the development and application number (i.e. SSD-47320208 for Project Echidna Data Centre Eastern Creek)
- (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- (c) identify how the incident was detected
- (d) identify when the applicant became aware of the incident
- (e) identify any actual or potential non-compliance with conditions of consent
- (f) describe what immediate steps were taken in relation to the incident
- (g) identify further action(s) that will be taken in relation to the incident, and
- (h) identify a project contact for further communication regarding the incident.

Incident is defined in the SSD approval as:

- (a) An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.*
- (b) Material harm is defined as harm that:*
- (c) a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or*
- (d) b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)*

Refer to Section 8.1 for notification requirements relating to non-compliance.

5.5.1.2 Detailed Incident Report

Within 30 days of the incident (or as otherwise agreed by the Planning Secretary), the SO must submit a detailed incident report to the Planning Secretary and any relevant public authorities. The report must include:

- A summary of the incident
- Results of the incident investigation and identification of the cause
- Details of corrective and preventative actions implemented or planned
- Information on any communications with stakeholders regarding the incident
- The incident management process will support continual improvement in environmental performance

A summary of incident-related reporting requirements is provided in Table 7-1 of this OEMP.

5.5.2 EPA & Other Services

The EPA will be notified of any pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the NSW Protection of the Environment Operations Act 1997. The circumstances where this will take place are where:

- It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations).

Other Agencies may need to be notified in the event of an incident are:

- Emergency Service
- Local Councils

5.6 Workplace Travel Plan

As identified in the EIS traffic and transport assessment, the WTP encourages sustainable transport options to reduce traffic impacts. It outlines measures such as carpooling, end-of-trip facilities for cyclists, and potential public transport connections to support reduced reliance on private vehicles during operation. The WTP is attached under Appendix A.

5.7 Landscape Management Plan

The Landscape Management Plan (LMP), prepared in accordance with Conditions B44 and B45 and consistent with the EIS landscape and visual impact assessment, provides a framework for the care, maintenance, and monitoring of the site's landscape. The plan establishes responsibilities for weed, pest, and disease control, pruning and replacement of plants, soil and mulch management, irrigation performance, and waste management. It also sets out reporting schedules, logbook requirements, and inspection protocols to ensure accountability and adaptive management. Importantly, the LMP supports long-term ecological health, visual amenity, and site functionality through soil monitoring, structured fertilising and watering programs, and the use of native species as per the approved planting schedule (Appendix 1)

5.8 Emergency Spill Response Plan

The Emergency Spill Response Plan (*SYD57.SpillResponsePlan.SOP*) outlines roles and procedures for managing emergency events, including power loss, spills and fires. It supports compliance with the POEO Act and Condition C10. This plan is held within the SO's digital Policy and Standard Operating Procedures (SOP) system.

5.9 Waste Management Plan

The WMP (*OTHER.SYD.EMP.DCEO.SYD57*) outlines how operational waste streams, such as e-waste, general waste, and recyclables will be managed in compliance with regulatory obligations. The plan addresses waste minimisation, storage, handling, and disposal protocols to prevent environmental harm and ensure efficient resource use during the data centre's operational phase.

5.10 Nitrogen Dioxide Monitoring Procedure

The Nitrogen Dioxide Monitoring Plan (NDMP) for Project Echidna, prepared by Northstar Air Quality Pty Ltd, outlines the procedures to manage and monitor nitrogen dioxide (NO₂) emissions associated with the operation of standby generators at the DC. The NDMP was developed to satisfy Condition B5 of the project's development consent and forms part of the site's broader OEMP. It identifies relevant air quality impact criteria from the NSW EPA (2022), including the 1-hour (164 µg/m³) and annual (31 µg/m³) NO₂ thresholds, and outlines emission controls such as the use of Tier II low-emission generators, minimised generator runtime, and robust mains power reliability via an N+1 electrical supply system.

Monitoring of NO₂ emissions is conducted during generator commissioning and periodically thereafter using standard EPA test methods (TM-1, TM-2, TM-11). The plan relies on an established source-pathway-

receptor (SPR) linkage validated through the project's air quality impact assessment, ensuring that actual emissions remain within modelled and approved parameters.

Any exceedances identified through compliance testing must be reported to the Department of Planning within six weeks and addressed through root cause investigation and corrective action. The NDMP is reviewed annually to ensure it remains aligned with regulatory expectations and site operations.

5.11 Power Outage Notification Protocol

In line with Condition B7, this protocol outlines the steps the SO will follow in the event of generator operation during a power outage. It includes information on the neighbouring properties which would be notified should a power outage event last 30 minutes or more, and trigger points and methods for notifying neighbours.

5.12 Loading Dock Delivery Management Plan

A Loading Dock and Delivery Management Plan (LDDMP) has been prepared, consistent with the approach outlined in the EIS, to manage service and delivery vehicle operations during the operational phase of the data centre. The plan includes details on the location and capacity of the on-site loading dock, anticipated delivery frequencies, and mitigation measures to minimise impacts on the surrounding road network.

6. Implementation

This section identifies the key environmental aspects and potential impacts associated with the ongoing operation of the Project. It outlines the environmental management activities and measures that must be implemented or adhered to during operations.

Each environmental issue is addressed individually, with a focus on specific environmental objectives, key operational issues, and the measures required to achieve compliance with the EIS, Conditions of Consent, and applicable management plans.

6.1 Operational environmental management aspects and impacts

6.1.1 Visual

The DC and associated infrastructure have been developed within an industrial precinct and are consistent with the built form and character of Oakdale West Estate. The urban design has been guided by the principles of *Better Placed* (NSW Government Architect, 2017), responding to the site's industrial context, its visibility, and the broader character of the Cumberland Plain.

While the facility remains visible from various nearby viewpoints, the introduction of landscaped areas around the buildings provides an enhanced level of visual amenity for workers, visitors, and surrounding road users. These landscaped zones are intended to soften the visual impact of the built form and support long-term integration into the estate's setting.

Lighting associated with the site has been designed to avoid obtrusive light spill and is compliant with Australian Standards (AS/NZS 4282:2019). Landscape planting will be maintained to support screening and improve aesthetic outcomes as vegetation matures.

Key environmental performance objective

- Lighting has been designed to minimise visual intrusion and potential impacts on adjacent properties. Therefore, no ongoing operational environmental requirements associated with this aspect.

Key environmental issues

- No ongoing operational environmental requirements associated with this aspect.

Table 6-1. Operational Management Visual

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The site and landscape planting will be managed to maintain its visual and amenity function. This will ensure the area's wider values are protected and the appearance of the site is maintained to reduce the impacts of time, climate, and use, consistent with Objective 6 of <i>Better Placed</i> .	DCEO (landscape maintenance)	Ongoing	SSD- 47320208 EIS Condition 1E

6.1.2 Traffic, transport and accessibility

The primary operational traffic impacts of the Project relate to staff commuting, visitors, and service vehicles. The site will accommodate up to 50 full-time staff, with roles distributed across three shifts, resulting in a maximum of 30 personnel on site at any given time. In addition, the site will host up to 10 daily visitors and accommodate up to 9 service vehicles. Adequate on-site parking is provided, including 38 staff spaces, 10 visitor spaces, and queuing capacity for vehicles at the site entrance in accordance with AS 2890.1:2004, preventing overflow onto Eastern Creek Drive.

The surrounding road network, designed to support the broader precinct development, has sufficient capacity to accommodate this additional traffic without congestion. The marginal traffic increase at the Old Wallgrove Road/Wallgrove Road intersection (~1%) is considered negligible.

To promote sustainable transport, the site will implement a WTP encouraging walking, cycling, and public transport, aligned with the Future Transport Strategy 2056. However, due to the site's remoteness, the plan will be reviewed periodically to assess its effectiveness.

On-site safety measures will include clear signage, line marking (AS 1742.2:2009 compliance), designated pedestrian routes, and safe circulation designs, including capacity for 19m semi-trailers to reverse safely into loading bays.

Key environmental performance objective

- Maintain safe and efficient access and movement within and around the site.
- Minimise impacts on the external road network from operational traffic.
- Promote sustainable transport options for staff and visitors.

Key environmental issues

- Increased traffic volumes from staff, visitors, and service vehicles.
- Safety of pedestrian and vehicle movements within the site.

Table 6-2. Operational Management Traffic, Transport and Accessibility

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Design consultant	Complete	SSD-47320208 Condition B21
The Applicant must ensure:	Construction phase completed. DCEO for maintenance	Ongoing – maintenance only	SSD-47320208 Condition B22
(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004), AS 2890.2:2018 Parking facilities Off-street Commercial Vehicle Facilities (Standards Australia, 2018) and AS 2890.6:2009 Parking facilities Off-street parking for people with disabilities (Standards Australia, 2009)			
(b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;	Design consultant	Complete	
(c) the development does not result in any vehicles queuing on the public road network;	DCEO	Ongoing	
(d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;	DCEO	Ongoing	
(e) all vehicles are wholly contained on site before being required to stop;	DCEO	Ongoing	
(f) all loading and unloading of materials is carried out on-site;	DCEO	Ongoing	
(g) all trucks entering or leaving the site with loads have their loads covered and	DCEO	Ongoing	
(h) do not track dirt onto the public road network; and	DCEO	Ongoing	
(i) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	DCEO	Ongoing	
A Loading Dock Delivery Management Plan (LDDMP) will be prepared that provides details of the onsite loading dock, and the number and frequency of service and delivery vehicle movements during operation. The Plan will also outline the measures that will be implemented to ensure service and delivery vehicles do not adversely impact on the surrounding road network.	DCEO	Ongoing	SSD-47320208 EIS Condition 2F

6.1.3 Biodiversity

No operational biodiversity impacts are expected, as the site was previously cleared under the Concept Plan and contains no remnant native vegetation. A BDAR waiver was granted (see Appendix F of the EIS).

Indirect impacts, such as weed, pest, and pathogen spread, will be managed through biosecurity protocols and regular site inspections.

Key environmental performance objective

- Prevent spread of weeds, pests, and pathogens during operations.
- Maintain site conditions that avoid environmental hazard or loss of surrounding amenity.

Key environmental issues

- Risk of weed or pest introduction via vehicle or equipment movements.
- Attraction of vermin without proper site hygiene.

Table 6-3. Operational Management Biodiversity

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
Biosecurity measures will be maintained to prevent the spread of weeds, pests, and pathogens. These measures are outlined in the LMP attached as appendix B.	DCEO	Ongoing	SSD-47320208 EIS Condition 4D

6.1.4 Air quality

Routine operation of backup generators will generate minor air emissions (particulates, oxides, hydrocarbons). These emissions are well within applicable health, amenity, and pollution criteria, as confirmed by the EIS (Appendix J). Emergency generator use during a mains outage is rare and short-term. No significant operational air quality impacts are expected.

Key environmental performance objective

- Ensure generator testing and operation does not result in air quality exceedances.
- Minimise air quality impacts from generator testing by limiting concurrent tests and managing test loads in accordance with the prescribed maintenance regime.

Key environmental issues

- Risks to air quality (nitrogen dioxide) during operation of standby generators in the event of a loss of mains power
- Risks to air quality during maintenance of standby generators

Table 6-4. Operational Management Air Quality

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the Protection of the Environment Operations (Clean Air) Regulation 2022.	DCEO	Ongoing	SSD-47320208 Condition B3
The Applicant must ensure the design, installation and operation of the back-up generators and/or the associated enclosures do not preclude the ability for additional air pollution emission controls to be retrofitted.	DCEO (operation)	Ongoing	SSD-47320208 Condition B4
The back-up generators and other equipment will be routinely serviced to manufacturer specifications to maintain their operational efficiency.	DCEO	Ongoing	SSD-47320208 EIS Condition 5D
A Back-up Generator Incident Report will be prepared within 30 days of the system being used in an emergency. The Report will detail:	DCE	Within 30 days of the system	SSD-47320208

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
- The date and time of the power outage - The total number of back-up generators used to power the site - The total number of hours the back-up generators were operated - The total quantity of diesel used to feed the back-up generators - The total amount of electricity produced by the generators - Evidence to prove the air quality goals were not exceeded.		being used in an emergency	EIS Condition 5E

6.1.5 Noise and vibration

The DC has been designed to mitigate operational noise impacts, with detailed modelling and assessment documented in the Environmental Impact Statement (EIS) and associated technical reports. Noise monitoring will follow the procedures and exemptions outlined in the NSW Noise Policy for Industry (EPA, 2017), with sensitive receiver locations shown in Figure 6-1 and in Appendix 3 of this consent.



Figure 6-1. Sensitive receiver locations

Key environmental performance objective

- Ensure compliance with noise criteria during routine operations and generator testing
- Avoid exceedance of Industrial Noise Policy (INP) and NSW Noise Policy for Industry (NPfI) criteria

Key environmental issues

- Continuous noise from fans and condenser units, particularly during night-time operation.
- Elevated noise levels during generator load testing due to use of external load devices.
- Potential for noise disturbance during rare emergency generator operation

Table 6-5. Operational Management Noise and Vibration

Operational Management Criteria	Responsibility	Timing / frequency	Reference																
Environmental Action and Management Measures:																			
The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the below table. <table border="1"> <thead> <tr> <th>Location</th><th>Day L_{Aeq}(15 minute)</th><th>Evening L_{Aeq}(15 minute)</th><th>Night L_{Aeq}(15 minute)</th></tr> </thead> <tbody> <tr> <td>Residential receivers^a</td><td>46</td><td>43</td><td>38</td></tr> <tr> <td>Commercial receivers</td><td></td><td>63</td><td></td></tr> <tr> <td>Industrial receivers</td><td></td><td>68</td><td></td></tr> </tbody> </table> <i>Table 2 Noise Limits (dB(A))</i>	Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)	Residential receivers ^a	46	43	38	Commercial receivers		63		Industrial receivers		68		DCEO	Ongoing	SSD-47320208 Condition B14
Location	Day L _{Aeq} (15 minute)	Evening L _{Aeq} (15 minute)	Night L _{Aeq} (15 minute)																
Residential receivers ^a	46	43	38																
Commercial receivers		63																	
Industrial receivers		68																	
The Applicant must ensure the operation of plant and equipment does not generate intermittent noise at receiver locations identified in Table 2 in accordance with Fact Sheet C of the NSW Noise Policy for Industry (EPA, 2017).	DCEO	Ongoing	SSD-47320208 Condition B15																
Within three months of the commencement of full operation of the development (described in the EIS as being when all data storage equipment and associated infrastructure is in place and operating), or as otherwise directed by the Planning Secretary, the Applicant must prepare and submit a noise verification report for the development. The noise verification report must: (a) be prepared to the satisfaction of the Planning Secretary by a suitably qualified acoustic consultant; (b) demonstrate that noise verification has been carried out by a suitably qualified and experienced acoustic consultant in accordance with the latest version of: (i) AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018); and (ii) Approved Methods for the Measurement and Analysis of Environmental Noise in NSW (EPA, 2022); and (c) include: (i) an analysis of the development’s compliance with the noise limits specified in condition B14; (ii) an outline of management actions to be taken to address circumstances where the noise limits specified in condition B14 are exceeded; and (iii) a description of contingency measures in the event management actions are not effective in reducing noise levels to an acceptable level.	Design engineering	Within three months of the commencement of full operation	SSD-47320208 Condition B16																
Attended noise compliance monitoring will be carried out within three months of the site’s full operation (i.e., after the full fit out). It will be carried out by a suitably qualified and experienced acoustic consultant at surrounding sensitive receivers. It will occur: • When the development is operating, and the back-up generators are being tested • For 1.5 hours during the day, 30 minutes during the evening, and one hour at night. • If the modelling shows a risk of exceedance, then additional noise mitigation measures will be investigated and installed.	Design engineering	Within three months of the commencement of full operation	SSD-47320208 EIS Condition 6K																
A Noise Compliance Verification report will be prepared within 30 days of completing the attended noise compliance monitoring. This report will be prepared by a suitably qualified and experienced person. It will assess compliance against the Noise Policy for Industry (EPA, 2017). Outline management actions will be taken to address any exceedances of the noise limits. The Report will describe the contingency measures used if management actions are not effective in reducing noise to an acceptable level.	Design engineering	Within 30 days of completing the attended noise compliance monitoring	SSD-47320208 EIS Condition 6L																
The operational equipment and machinery will be maintained within performance specifications. This will include testing and maintaining the back-up diesel generators in accordance with the schedule set out in the EIS.	DCEO	Ongoing	SSD-47320208 EIS Condition 6M																
Any received noise complaint will be investigated, and additional noise monitoring will be carried out if needed. In the event of discovering that the complaint is valid, additional noise mitigation measures will be investigated and implemented as needed.	DCEO / DCE	On receipt of complaint	SSD-47320208 EIS Condition 6N																

6.1.6 Soil and water

During operations, exposed or poorly vegetated soils may be prone to erosion, sedimentation, and runoff-related degradation, particularly around overland flow discharge points or in the event of spills during maintenance. To mitigate these risks, site infrastructure has been designed in line with Australian Standards and Council requirements to manage stormwater, wastewater, and flooding. The stormwater system includes a 50,000-litre rainwater capture tank and gross pollutant traps, eliminating the need for further water sensitive urban design. Wastewater from the administration building and cooling system (approx. 11 ML/year) will be accommodated by the Sydney Water network. The site is elevated above flood planning levels and includes infrastructure to prevent inundation during extreme events. A water balance confirms that operational demand can be met using a mix of rainwater harvesting and potable supply.

Key environmental performance objective

- Ensure ongoing functionality of drainage and stormwater infrastructure.
- Ensure effective management of stormwater and wastewater consistent with Council and Sydney Water standards.
- Prevent flooding and localised ponding during extreme weather events.
- Maintain water quality through appropriate onsite treatment measures.

Key environmental issues

- Potential erosion and sedimentation from unsuccessful landscape reinstatement.
- Loss in soil quality due to runoff, particularly if stormwater drains are not adequately maintained.
- Spills or leaks during maintenance and servicing activities.
- Risk of surcharging or ponding if stormwater system is not maintained.
- Minor localised flooding during extreme rainfall events.

Table 6-6. Soil and Water Conditions

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The Applicant must maintain the stormwater management system installed on the site under condition B30 for the duration of the development.	DCEO	Ongoing	SSD- 47320208 Condition B31
An Emergency Spill Plan will continue to be implemented onsite.	DCEO	Ongoing	SSD- 47320208 EIS Condition 7H
The stormwater drains, channels, gross pollutant traps, pits, sumps, and overland flow routes will be routinely inspected and maintained to avoid any blockages to prevent soil quality loss.	DCEO	Ongoing	SSD- 47320208 EIS Condition 8C

6.1.7 Hazard and risk

The site will store and use hazardous materials such as batteries, diesel, and maintenance-related chemicals, though all are below thresholds requiring a Preliminary Hazard Analysis or Environmental Protection License (EPL). Risks are reduced through established controls, including fire-rated battery rooms, compliant diesel storage (AS1940:2017), and licensed contractor refuelling. No underground fuel or gas infrastructure is present, and the facility will adopt a high-frequency servicing regime to minimise equipment failure risk.

Key environmental performance objective

- Mitigate fire and explosion risks associated with hazardous materials.
- Ensure hazardous substances are stored and handled in accordance with relevant standards.
- Minimise operational risk through preventative maintenance and hazard identification.

Key environmental issues

- Fire risk from battery storage and diesel handling.
- Risk of spills or exposure to petrol, lubricants, and paints.

Table 6-7. Operational Management Hazard and Risk

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The Applicant must design and operate the development in accordance with: (a) AS/ NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles (Standards Australia, 2000); (b) IEC 62619:2022 Secondary cells and batteries containing alkaline or other non-acid electrolytes – Safety requirements for secondary lithium cells and batteries, for use in industrial applications (Standards Australia, 2023); and (c) AS 1940:2017 The storage and handling of flammable and combustible liquids (Standards Australia, 2017). In the event of an inconsistency between the standards listed above, the most stringent requirement shall prevail to the extent of the inconsistency.	DCEO (Operation)	Ongoing	SSD-47320208 Condition B36
The Applicant must ensure that the quantities of dangerous goods stored or transported to and from the development will not exceed the screening threshold quantities in the Department's Applying SEPP 33 at all times.	DCEO	Ongoing	SSD-47320208 Condition B37
At least two months prior to the commencement of commissioning of the development, or within such further period as the Planning Secretary may agree, the Applicant must submit a comprehensive Emergency Plan and detailed emergency procedures for the development to the Planning Secretary and FRNSW. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.	DCEO	Two months prior to the commencement of commissioning of the development	SSD-47320208 Condition B41
The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	DCEO	Ongoing	SSD-47320208 Condition B42
Hazardous materials will be removed and disposed of in accordance with the relevant legislation, codes of practice, Australian Standards, and the Work Health and Safety Regulation 2017.	DCEO	Ongoing	SSD-47320208 EIS Condition 6L
All hazardous substances will be stored and managed in accordance with relevant Australian Standards, and in particular, AS1940:2004-The Storage and Handling of Flammable and Combustible Liquids (Standards Australia, 2004), the Hazardous and Offensive Development Application Guidelines - Applying SEPP 33 (DoP, 2011), Storing and Handling Liquids – Environmental Protection – Participant's Manual (DECC, 2007), the Work Health and Safety Regulation 2017, and the Environmentally Hazardous Chemicals Act 1985.	DCEO	Ongoing	SSD-47320208 EIS Condition 6L
Dangerous good quantities will remain below the thresholds listed in the Hazardous and Offensive Development Application Guidelines – Applying SEPP33 (DoP, 2011).	DCEO	Ongoing	SSD-47320208 EIS Condition 9D
At least two months prior to the commencement of commissioning of the development, or within such further period as the Planning Secretary may agree, the Applicant must submit a comprehensive Emergency Plan and detailed emergency procedures for the development to the Planning Secretary and FRNSW. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.	DCEO	At least two months prior to the commencement of commissioning of the development, or within such other period as agreed by the Planning Secretary.	SSD-47320208 Condition B41

6.1.8 Waste management

Waste generated during operation will include:

- **General solid waste** from staff amenity areas and site offices (approx. 1,924 L/week).
- **Mixed recyclables and paper/cardboard** (approx. 2,885 L/week) from administration areas.
- **Green waste** from landscaping maintenance, to be removed for composting or licensed disposal.
- **Electronic waste (e-waste)**, including end-of-life data equipment, will be collected via dedicated recycling contracts to prevent landfill disposal.
- **Hazardous waste**, including paints, solvents, and spill-related waste, will be managed through appropriate containment and licensed disposal.

A Waste Management Plan (WMP) has been prepared, and is attached as Appendix F, in accordance with the NSW Waste Classification Guidelines (2014) and the Blacktown Development Control Plan (2015). Waste will be stored in a dedicated enclosure with sufficient capacity for three days of on-site generation and collected by licensed contractors.

Waste hierarchy and objectives

Any waste produced during operation will be managed in general accordance with the waste hierarchy, classified according to the *Waste Classification Guidelines (NSW EPA, 2014)*. The waste hierarchy is a set of priorities for the efficient use of resources; this underpins the objectives of the *Waste Avoidance and Resource Recovery Act 2001*. The waste hierarchy is:

- **avoidance** including action to reduce the amount of waste generated by households, industry and all levels of government.
- **resource recovery** including re-use, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources
- **disposal** including management of all disposal options in the most environmentally responsible manner.

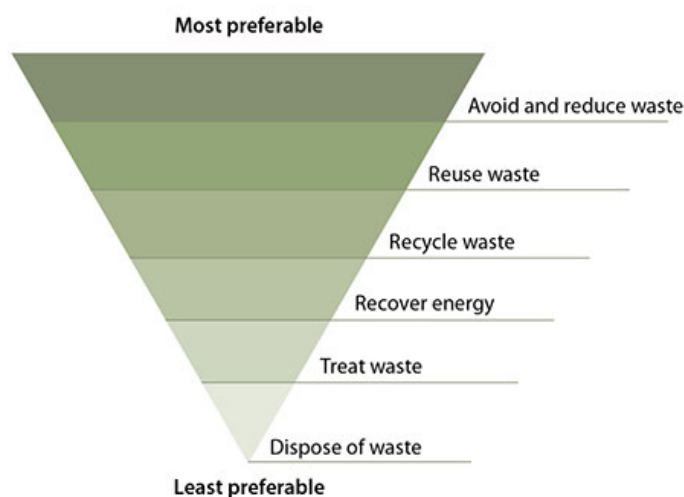


Figure 6-2. Waste Hierarchy. Ordered by most preferable: avoid and reduce; reuse; recycle; recover energy; treat; dispose of waste (Source: NSW EPA)

The EPA Waste Classification Guidelines provide clear criteria for the classification of waste materials to ensure proper handling, disposal, and recycling processes. These guidelines support the objectives set by the *Protection of the Environment Operations Act 1997*, which aims to protect the environment by regulating pollution and waste operations through licensing, monitoring, and compliance mechanisms. Additionally, the *Protection of the Environment Operations (Waste) Regulation 2014* focuses on detailed waste management practices that aim to prevent environmental harm by reducing and regulating waste generation and disposal.

In alignment with the *Plastic Reduction and Circular Economy Act 2021*, efforts will also be made to mitigate environmental and health impacts caused by plastic waste and promote a sustainable circular economy.

Key environmental performance objective

- Comply with operational waste management procedures and recovery obligations.
- Minimise waste generation and maximise reuse and recycling onsite.

Key environmental issues

- Improper segregation or disposal of waste affecting compliance and sustainability goals.
- Improper maintenance of designated storage area and waste facilities.

Table 6-8. Operational Management Waste Management

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
A Waste Management Plan will be prepared and implemented in accordance with the Guideline for Waste Management in New Developments (Blacktown City Council, 2015) and the waste hierarchy. Specifically, the Plan will include: • provision for source separation systems for recyclable materials, including, paper and card, mixed recyclables, e-waste, and hazardous waste • include recovery, recycling and waste diversion targets based on the aim to divert at least 80 percent of construction waste from landfill as per the Waste Resource and Recovery Act 2001 • a list the resource recovery exemptions and orders used onsite (EPA, 2022) • provisions for the adequate storage and collection of waste • requirements for a licenced contractor to handle all recovered and recycle materials • measures from the National Waste Policy: Less Waste, More Resources (DAWE, 2018) • procedures for temporary waste storage and stockpiling • Set out processes for disposal, including onsite transfer, management, and the necessary associated approvals and permits • Include provisions to: • Minimise onsite storage to avoid potential issues associated with odour, visual amenity, and attracting vermin and pests • Contain materials during storage and transport, such as covering, fencing and bunding • Outline an Unexpected Finds Protocol Include a process for auditing, monitoring, and reporting.	DCE (Preparation) DCEO (Implementation)	Ongoing	SSD-47320208 EIS Condition 10A
All material will be firstly classed under existing resource recovery order to prioritise recovery. Failing that, it will be classified in accordance with the NSW Waste Classification Guidelines (EPA, 2014). Finally, they will be handled and managed in accordance with the provisions of the Protection of the Environment Operations Act 1997 and supporting Waste Regulations.	DCEO	Ongoing	SSD-47320208 EIS Condition 10B
Waste will always be secured and maintained within a designated storage area and must not be stored on neighbouring public or private properties.	DCEO	Ongoing	SSD-47320208 EIS Condition 10C
Materials removed from site will be directed to a resource recovery, recycling, or waste management facility, otherwise premises lawfully permitted to accept the materials.	DCEO / Waste Vendor	Ongoing	SSD-47320208 EIS Condition 10D
Waste generated outside must not be received at the site for storage, treatment, processing, reprocessing, or disposal. This includes waste generated on Building 1/1A.	DCEO	Ongoing	SSD-47320208 EIS Condition 10E

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Stockpiled and stored wastes will be: • Appropriately segregated to avoid mixing and contamination • Labelled • Stored to minimise the risk of erosion, leaks, and spills Isolated from overland flow paths and stormwater drains.	Construction / maintenance contractor	Ongoing	SSD-47320208 EIS Condition 10F

6.1.9 Social and sustainability

The Project will generate skilled employment opportunities during operation, particularly within the information technology and infrastructure sectors. By drawing from both local and regional labour markets, it will contribute to economic growth and align with broader strategic objectives to expand employment lands in Western Sydney, supporting long-term regional development and job creation.

The development also incorporates principles of ecologically sustainable development (ESD). Precautionary approaches have been applied through conservative design assumptions and energy efficiency targets to manage environmental uncertainty. Intergenerational equity is addressed by minimising reliance on natural resources and reducing long-term environmental impacts. The landscaping strategy enhances biodiversity by using native, water-efficient species aligned with the Cumberland Plain Woodland. Additionally, the Project considers lifecycle costs and adopts the polluter-pays principle to ensure that environmental responsibilities are met throughout the operational phase.

Key environmental performance objective

- Minimise potential amenity impacts to surrounding land uses during operations.
- Support local employment opportunities and economic development.
- Maintain security and access controls to ensure public safety.
- Promote sustainable operation through resource efficiency and low-impact design.
- Apply the precautionary principle in managing operational uncertainties.

Key environmental issues

- Perceived change in land use character and increased activity in the area.
- Long-term energy and water consumption, placing ongoing demand on natural resources.
- Potential future inequity in access to natural capital.

Table 6-9. Operational Management Social & Sustainability

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The final ESD initiatives will be confirmed during the detailed design and their performance and benefit will be measured (Complete). The Proponent will report on their implementation in its operational and corporate key performance indicator reporting. The initiatives will be revised or revisited if the Proposal falls below the Proponent's corporate standards. The initiatives will also be revisited if they are not aligned with, or achieving, the NSW Government's net zero emission goals as they relate to the use of natural capital provisions (i.e., energy, water, natural resources).	Sustainability	Ongoing	SSD-47320208 EIS Condition 3A
Use of local community and First Nation businesses will be prioritised to supply materials and services.	DCEO	Ongoing	SSD-47320208 EIS Condition 12J
The local community and First Nations employment and training opportunities will be prioritised.	DCEO	Ongoing	SSD-47320208 EIS

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
			Condition 12K

6.1.10 Infrastructure, Utilities, and Cumulative Impacts

All essential infrastructure, mains power, potable water, telecommunications, and wastewater, has been secured and confirmed as sufficient to meet operational demands without affecting existing supply. No additional infrastructure agreements are required.

Cumulative impacts during operation are not expected to be significant. Traffic volumes were addressed under the Concept Design Approval, with road access designed to accommodate combined site use. Air quality modelling confirms compliance with health and amenity criteria, and utility systems have adequate capacity to support full site operations. No further social impacts are anticipated.

Key environmental performance objective

- Operate within the capacity of existing public infrastructure.
- Mitigate cumulative impacts from concurrent operations.
- Maintain compliance with all approved environmental performance criteria.

Key environmental issues

- Increased demand on utilities, including water, wastewater, electricity, and telecommunications.
- Combined operational traffic affecting site access, internal circulation, and external networks.
- Cumulative noise, visual, and air quality impacts from concurrent data centre operations and generator use

Table 6-10. Operational Management Infrastructure, Utilities and Cumulative Impacts

Operational Management Criteria	Responsibility	Timing / Frequency	Reference
Environmental Action and Management Measures:			
The onsite infrastructure and utilities will be routinely inspected, serviced, and maintained to prevent any containment or operational loss. It will also be used to maintain efficiency and prevent operational issues to other customers.	DCEO	Ongoing	SSD-47320208 EIS Condition 13J

6.2 Contingency management plan

The environmental risk analysis below forms part of the Contingency Management Plan and reflects the key operational environmental risks identified in the EIS. This plan outlines the potential impacts, likelihood, and consequences of unplanned events during operation. Section 6.1 of the OEMP details the control measures in place for each risk area to prevent or mitigate environmental harm, ensuring appropriate contingency responses are available if standard controls fail.

Table 6-11. Contingency Plan

Risk Aspect	Trigger / Response	Condition Green	Condition Orange	Condition Red
Visual	Trigger	Landscaping and lighting maintained in accordance with approved LMP	Degraded planting, weed infestation, or increased light spill to nearby sensitive receivers	Extensive landscaping failure or significant visual amenity complaints from neighbours
	Response	Routine landscape and lighting inspections	Maintenance activities modified, replanting as per Landscape Management Plan	Implement urgent rectification works.
Traffic, Transport and Accessibility	Trigger	Adherence to designated routes and schedules	Isolated delays or confusion due to delivery conflicts	Ongoing local traffic complaints, safety concerns, or route deviations
	Response	Monitor trip generation and delivery schedules	Review Loading Dock Delivery Plan, retrain contractors	Update travel plans, consult Council and notify Planning Secretary if conditions breached
Traffic Queuing	Trigger	No queuing identified at the site access	Queuing identified at the site access	Queuing identified on the public road as a direct result from activities within the site
	Response	No response required. Continue monitoring program	Review delivery schedules prepared by the tenant. Provide additional training to drivers and tenant representatives	Review delivery schedules prepared by the SO. Provide additional training to drivers and SO representatives
Parking	Trigger	Parking occupancy less than provided on-site capacity	Parking bay requirements are within 90% of the provided spaces	Parking requirements exceed parking spaces provided
	Response	No response required. Continue monitoring program	Review and investigate parking rates. Provide additional training to tenants on lowering parking demands	Temporary modification of activities, where practicable. Provide incentives for carpooling and active transport measures
Pedestrian Safety	Trigger	No unsafe pedestrian movements identified	Pedestrian behaviour identified to be risky and unsafe	Site design/operations place pedestrians in unsafe situations with multiple near miss events
	Response	No response required. Continue monitoring program.	Review needed to address persistent unsafe movements. Modify traffic controls to self-enforce appropriate vehicle manoeuvres.	Cessation of unsafe movements using measures such as notification to site staff and visitors, signage / barricades, review of potential design modifications where practicable.
Road Conditions	Trigger	Following periods of adverse weather, internal roads have been inspected and no issues found.	Internal roads inspected following adverse weather and minor issues found (small potholes, debris, pooling water).	Internal roads inspected following adverse weather and major issues found (failed road integrity, large potholes, fallen infrastructure).
	Response	No further action required until next adverse weather event.	Clear any impediments to access roads. Repair potholes and remove excess water when traffic volumes are lowest.	Install detour around unsafe obstacles to ensure safety for all motorists and pedestrians.

Risk Aspect	Trigger / Response	Condition Green	Condition Orange	Condition Red
Biodiversity – vegetation management	Trigger	Native species planted and maintained as per Landscape Management Plan.	Early signs of plant mortality or weed invasion.	Non-compliance with species selection or planting density, or landscape degradation.
	Response	Maintenance in line with Landscape Management Plan.	Replace non-compliant or dead species; modify land management activities, undertake weed control.	Replant urgently.
Biodiversity - Wildlife Protection	Trigger	No unexpected wildlife encountered on site.	Unexpected uninjured wildlife encountered on site.	Unexpected injured/deceased wildlife encountered on site.
	Response	Continue OEMP implementation.	Stop Work Procedure: - Stop work/prevent personnel from entering area - Notify relevant site representative - Manager to assess if animal can be encouraged to leave safely or if wildlife carer required	Stop Work Procedure: - Stop work/prevent personnel from entering area - Notify relevant site representative - Immediately contact WIRES or other relevant wildlife care for injured animals
Air Quality – generator operations	Trigger	Generator testing logs confirm compliance with test loads and schedules.	Increase in generator testing frequency.	Generator use during outage or exceedance of predicted emissions
	Response	Maintain generator logs, routine checks.	Confirm if compliant with modelling, seek specialist advice where required or if non-compliance is identified.	Submit Generator Incident Report (Condition C17), prepare mitigation strategy for future testing
Noise and Vibration – Operational noise	Trigger	Noise compliance confirmed by verification report.	Complaint from local receptor or increase in operational noise.	Confirmed exceedance of limits in B14 or faulty generator operation causing prolonged noise.
	Response	Post-commissioning report completed.	Implement complaint management procedure, investigate reasons and need for further assessment or mitigation.	Submit exceedance report and update noise control measures.
Soil and water	Trigger	No abnormal soil movement, erosion, or contamination.	Pooling or change in ground profile around service zones.	Spill, breach of bunding, or evidence of soil contamination
	Response	Inspect stormwater drainage and ground conditions after major rainfall events.	Isolate issue, reinforce bunding or erosion controls.	Activate Emergency Response Plan and notify EPA if material incident.
Stormwater & water management	Trigger	Stormwater system functioning as per EIS Appendix Q modelling.	Blocked pit or evidence of overflow near treatment areas.	Flooding impacts access/operations or uncontrolled discharge occurs.
	Response	Maintain treatment devices per maintenance guidliens and WSUD features.	Clear and maintain pits and biofilters more frequently, record issue.	Engage external contractor and prepare incident summary.
Waste Management	Trigger	Waste collected and separated correctly.	Evidence of incorrect bin use or storage overflow.	Repeated waste service failures, discharge from site, or illegal dumping.
	Response	Spill kits and bunding in place around fuel and chemical storage.	Increase collection, deliver refresher training to staff.	Notify EPA if contamination or non-compliance occurs.
Social /community	Trigger	No complaints or community engagement issues.	Single complaint or local query on access, noise, traffic.	Escalated concerns in media or with authorities.

Risk Aspect	Trigger / Response	Condition Green	Condition Orange	Condition Red
	Response	Monitor and maintain complaints log.	Investigate and respond formally to stakeholder, review sub-plan if needed.	Escalate to the SO's leadership, update mitigation strategies.
Infrastructure and Utilities	Trigger	Water, sewer and power utilities operate within predicted use.	Unexpected spike in water/power or short service outage.	Major outage or disruption to data centre operation or offsite impacts.
	Response	Operate utilities in accordance with predicted demand profiles.	Engage utility provider to diagnose issue.	Activate emergency power/failover protocols, submit compliance breach report if needed.
Cumulative Impact Management	Trigger	Operations remain below combined generator/noise/traffic thresholds.	Temporary overlap of high-load operations or activities.	Overlapping operations causing breach of modelling limits or new complaint cluster.
	Response	Plan and stagger maintenance/testing schedules.	Refine coordination across sites and buildings.	Update risk register and submit updated mitigation measures to Planning Secretary.

7. Monitoring, reporting and auditing

7.1 Environmental inspections

During the operational phase of the Project, environmental inspections will form a core component of the site's environmental management framework. These inspections are designed to ensure compliance with approval conditions of the Development Consent, the OEMP, and all applicable environmental standards, as well as to verify the ongoing effectiveness of implemented mitigation and management measures.

Environmental inspections and compliance checks will be carried out by the SO's operational teams. The frequency and scope of these inspections will be determined by operational risk and the results of previous compliance reviews.

Routine site inspections will be conducted at least quarterly during normal data centre operations to assess key aspects such as air quality controls, noise management, waste handling, hazardous materials storage, water and stormwater management, and overall site amenity. The inspection schedule may be increased during periods of higher risk activities (for example, major maintenance, emergency generator testing, or after commissioning of new infrastructure), and can be reduced where a sustained record of compliance is demonstrated.

Additional inspections will be triggered following significant environmental events, such as extreme weather, spills or leaks, non-compliance incidents, or complaints from neighbouring businesses or the community. These targeted inspections are intended to quickly identify and address any unforeseen impacts, consistent with the incident response and reporting protocols outlined in Section 5.5 of this OEMP and as required by the SSD consent conditions.

All findings from environmental inspection activities will be documented. Records will include the date and time of inspection, the personnel involved, observations, any deviations from OEMP requirements or consent conditions, corrective actions implemented, and proposed follow-up actions. Inspection outcomes will be reviewed regularly by the SO's operational teams to ensure ongoing compliance, identify recurring issues, and drive continuous improvement in site operational practices.

7.2 Environmental monitoring and reporting

Environmental monitoring and reporting are critical components of ongoing compliance for the DC. Specific requirements for operational monitoring, performance verification, and compliance reporting are set out in the Development Consent conditions of approval and are summarised in Table 7-1 below.

Table 7-1. Monitoring and reporting requirements

Activity	Monitoring/Reporting	Frequency	Responsibility
Post-commissioning noise verification report	Submit a noise verification report prepared by a qualified acoustic consultant demonstrating compliance with noise limits and identifying any exceedances or contingency actions (Condition B16).	Within 3 months of full operation (or as otherwise directed by the Planning Secretary)	Design engineering / DCEO
Compliance reporting	Submit a Compliance Report reviewing environmental performance, monitoring trends, discrepancies between predicted and actual impacts, and planned improvements (Condition C14). Prepared in accordance with DPE's Compliance Reporting Post Approval Requirements (2020).	Within the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary)	Design engineering
Incident reporting	Submit a detailed incident report to the Planning Secretary following an environmental incident, as defined under section 5.5. The report must include investigation findings, cause, corrective actions, and communication with stakeholders (Appendix 4, Condition C10).	Within 30 days of the incident (or as otherwise agreed by the Planning Secretary)	DCEO

Activity	Monitoring/Reporting	Frequency	Responsibility
Public availability of compliance report	Make Compliance Reports publicly available within 60 days of submission and notify the Planning Secretary at least 7 days prior to publication (Condition C15).	Within 60 days of submission	DCEO
Back-up generator testing	Maintain a log of all back-up generator tests including date/time, number of generators tested, and duration. Provide to the Planning Secretary upon request. (Condition C16)	For the life of the development (or as otherwise agreed)	DCEO
Back-up generator incident report	Submit a report to the Planning Secretary following use of emergency generators during a power outage. Report must include event details, generator use, fuel and energy data, air quality assessment, and recommended mitigation (Condition C17).	Within 30 days of generator use during power outage	DCEO
Public availability of information	Make key project documents and information (e.g. approvals, plans, staging, compliance reports, complaints register) publicly available on the project website and keep them up to date, to the satisfaction of the Planning Secretary (Condition C19).	From 48 hours before construction and for the life of the development	DCEO / DCE

7.3 Auditing

7.3.1 Internal auditing

Internal audits will be undertaken to assess the effectiveness of environmental controls and compliance with this OEMP and other relevant requirements. These audits will form part of a continuous improvement process and may include evaluation of the following elements:

- Compliance with statutory and regulatory obligations
- Compliance with standards, guidelines, specifications, and contract conditions
- Implementation of the OEMP and associated sub-plans
- Adequacy of monitoring programs and environmental reports
- Completion of environmental actions and commitments
- Environmental training records and staff competency
- Environmental records, checklists, and document control systems
- Timely preparation and submission of environmental reports
- Recording and close-out of corrective actions following incidents or complaints
- Progress toward environmental performance objectives
- Implementation of recommendations from previous audits

Internal audits will be carried out by appropriately qualified and experienced personnel, in line with an audit schedule.

7.3.2 Independent environmental audit

In accordance with Condition C18 of the approved SSD, any requirement relating to monitoring or environmental auditing—whether through a strategy, plan, or program—is considered a formal requirement under Division 9.4 of Part 9 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*.

This includes but is not limited to:

- Incident notification and response
- Non-compliance reporting
- Compliance reporting obligations
- Independent audits if requested by the Planning Secretary

Definitions:

- **Monitoring** refers to the collection of data related to environmental impacts or consent compliance
- **Environmental audit** is a documented evaluation to assess compliance or environmental performance

While an independent audit is not currently required, it may be initiated at SO's discretion or if directed by the Planning Secretary.

8. Improvement

8.1 Non-conformance, non-compliance and actions

8.1.1 Non-conformances

A non-conformance is any failure to follow the environmental management measures or operational procedures set out in this OEMP. Examples during operation may include missed inspections, incomplete monitoring, or failure to follow site-specific protocols.

All non-conformances will be:

- Documented in the project's environmental records
- Investigated to determine the root cause
- Addressed through corrective and/or preventative actions
- Tracked internally for follow-up and continuous improvement.

Investigations will identify:

- Immediate actions required to manage the issue (e.g. shutting down equipment, securing fuel storage, or limiting access)
- Root cause analysis (e.g. procedural gaps, training deficiencies)
- Required updates to processes, maintenance schedules, or staff training
- Follow-up inspections or checks to confirm effectiveness.

8.1.2 Non-compliances

A non-compliance is a breach of a legal or approval requirement, including the Conditions of Development Consent or any licence, permit, or legal obligation related to this OEMP or its sub-plans.

When a non-compliance is identified:

- It will be recorded and reported internally and to the Planning Secretary (if required) through the NSW Major Projects Portal
- An investigation will be conducted to determine:
 - Immediate actions taken to contain or correct the issue
 - The root cause (e.g. operational failure, equipment issue, human error)
 - Corrective and preventative actions
 - Verification of resolution through follow-up.

Where required, procedures will be reviewed and updated to avoid recurrence.

8.1.2.1 Non-Compliance Notification Requirements

In line with Condition C11, the SO will notify the Planning Secretary in writing within seven days of becoming aware of any non-compliance.

As per Condition C12, the notification must include:

- Project name (Project Echidna Data Centre Eastern Creek) and application number (SSD-47320208)
- The specific consent condition breached
- A description of the non-compliance and its (known) cause

- Any actions taken or planned to address the issue.

Note: Under Condition C13, if the non-compliance has already been reported as an incident under Condition C10, it does not need to be notified again.

A summary of reporting obligations and timeframes is provided in Table 7-1.

8.2 Review and continuous improvement

This OEMP will be reviewed on a regular basis to ensure it remains current, effective, and aligned with operational practices.

Triggers for review may include:

- Monitoring results
- Environmental incidents or complaints
- Audit or inspection outcomes
- Operational or technological changes
- Updates to legislation or development consent
- Identification of new or emerging environmental risks.

In accordance with Conditions C8 and C9, formal reviews must occur:

- Within three months of submitting an incident report (Condition C10)
- Within three months of approval of a modification to the development consent
- Within three months of receiving a direction from the Planning Secretary to review.

If revisions are required, the OEMP or relevant sub-plan must be updated and submitted to the Planning Secretary within six weeks (or as otherwise agreed).

Minor administrative changes (e.g., formatting, contact details) may be made without formal approval. All updated versions of this OEMP will be provided to DPHI and published on the Project website.

Appendix A. Workplace Travel Plan

Operational Environmental Team

Project Echidna

Work Place Travel Plan (WPTP)

Reference:

Final | 16 September 2025

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 293370-12

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Document Verification

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			Prepared by	Checked by	Approved by
		Name	Matthew Hanania	Bryony Dalton	Wendy Zheng
		Signature			
Final	15 th July 2025	Filename	Work Place Travel Plan		
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			Prepared by	Checked by	Approved by
		Name	Matthew Hanania	Bryony Dalton	Wendy Zheng
		Signature			
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		Description	Final following TfNSW comments		
			Prepared by	Checked by	Approved by
		Name	Bryony Dalton	Bryony Dalton	Wendy Zheng
		Signature			

Issue Document Verification with Document ☒

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1. Introduction

1.1 Purpose of this report

This Work Place Travel Plan (WTP) has been prepared on behalf of the operator in support of consent condition B23 of State Significant Development (SSD) 47320208 (Figure 1) submitted to the Department of Planning, Housing and Infrastructure (DPHI) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979).

Condition B23 – Work Place Travel Plan

Prior to the commencement of operation of any part of the development, the Applicant must prepare a Work Place Travel Plan to encourage the use of sustainable and active transport options by operational staff. The Plan must be included in the OEMP required by condition C5 and must:

- (a) be prepared in consultation with ~~TNSW~~;
- (b) outline facilities and measures to promote public transport usage, such as car share schemes and employee incentives; and
- (c) describe pedestrian and bicycle linkages and end of trip facilities available on-site.

Figure 1: SSD 47320208 Condition B23

The SSD seeks approval for a 35.2MW data centre known as Echidna (the proposal) at 10 Eastern Creek Drive, Eastern Creek NSW, legally described as Lot 4001 DP 1243178 (the site).

This report has been prepared to identify measures to promote the use of sustainable and active transport modes over private vehicle use when travelling to and from the site. The use of alternative transport methods is being strongly encouraged by government agencies to reduce the negative environmental impacts caused by the excessive use of private vehicles. The methods suggested within this WTP aim to positively influence the travel behaviour of workers and visitors by providing an overarching framework and guiding site-wide initiatives for the proposed data centre.

1.2 Site location and context

The site is situated within the Blacktown Local Government Area (LGA) on the corner of Eastern Creek Drive and Old Wallgrove Road. The site is also located approximately 15 km west of the Parramatta CBD and 8 km southwest of Blacktown. Other nearby centres include Erskine Park to the west (3.3 km), Wetherill Park to the southeast (6.3 km) and Mount Druitt to the northwest (5.2 km).

The area surrounding the site is predominantly industrial in nature and generally consists of various industrial uses, supplier warehouses and distribution centres amongst other development types typically found in an industrial zone.

1.3 Development description

The proposal (shown in blue) is the subject proposal area of the overall site located within the 10 Eastern Creek Drive site (area shown in red). The site area consists of two data centres: Building 1 (recently completed) and Building 2, also known as Echidna, as well as an associated substation and a small-scale data centre (labelled subject building and known as Building 1a).



Figure 2: Study area.

Figure 3 illustrates Building 1 and 1a which encompass the site entrance from Eastern Creek Drive as well as the car park, which will be shared with Echidna (this proposal, Building 2).

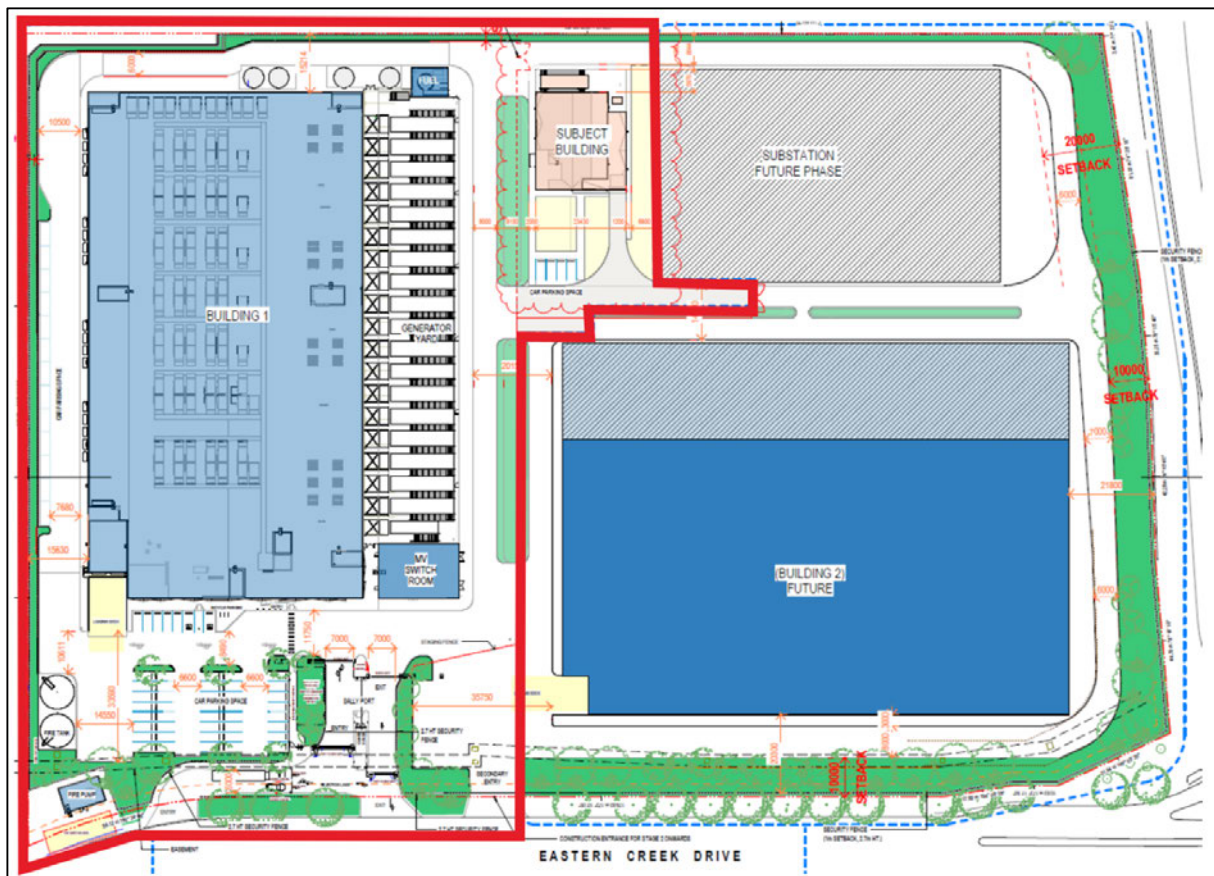


Figure 3: The site with Building 1 and 1a DA outlined.

Building 1 and 1a and the associated shared site entrance, shared car park and expected traffic generation was provided with the Aurecon Traffic Impact Assessment (2019) with adjoining modifications Technical Note (2021) for the DA for Building 1 and 1a and associated site works adjacent to the proposal. In addition, a Traffic and Transport Technical Report completed by Arup in 2023 was undertaken to support the State Significant Development Application for Echidna.

1.4 Overview of development

The site comprises a two-storey, 25m tall, 35.2MW data centre comprising of data halls, mechanical and electrical equipment rooms, offices, other ancillary support spaces, and external/rooftop mechanical and electrical equipment. The development will operate 24 hours a day, seven days a week.

On-site car parking spaces have been provided for staff and visitors, including disabled and electric vehicle parking.

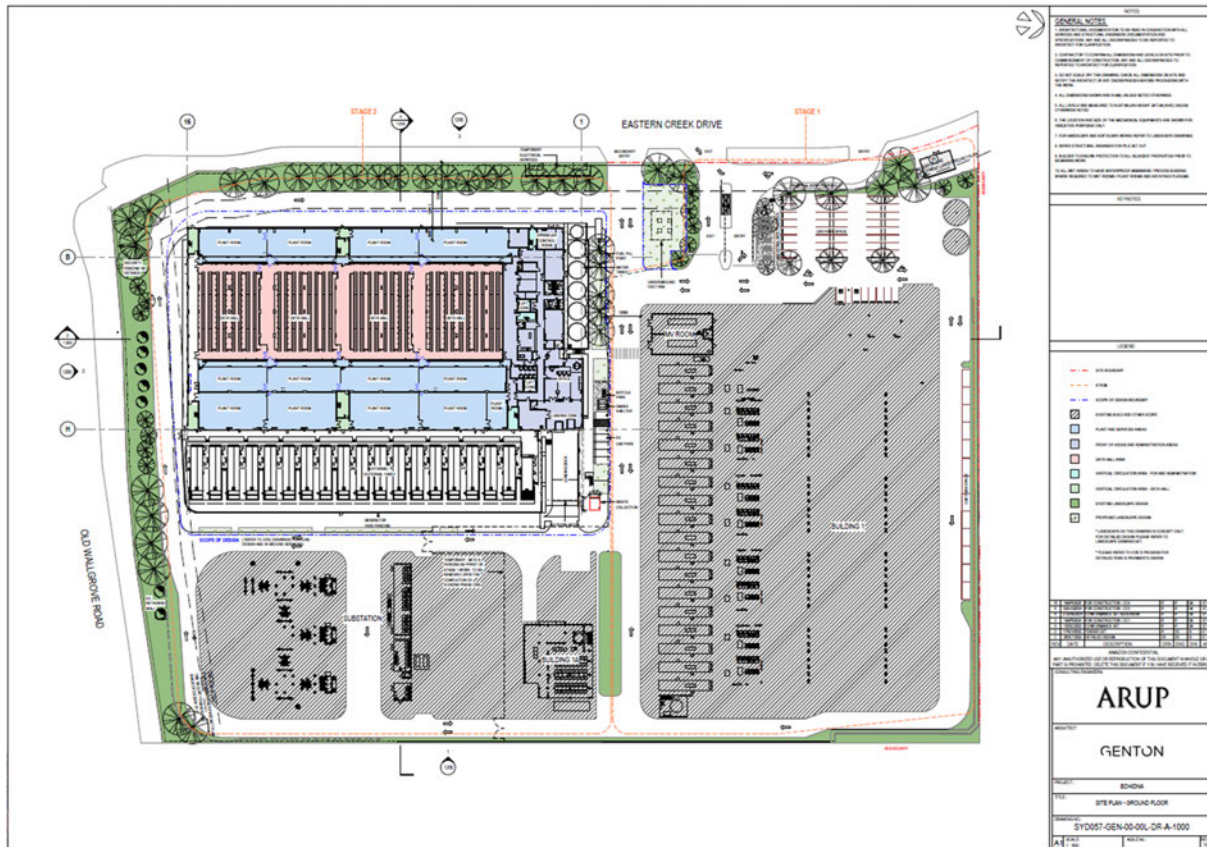


Figure 4: The site and development (Building 2, Echidna) outlined.

2. Work Place Travel Plan framework

2.1 What is a Work Place Travel Plan?

A WPTP is a package of measures put in place by the developer to encourage more sustainable travel whilst commuting to/from a site. It allows an organisation to demonstrate a commitment and a pro-active step towards improving environmental sustainability by reducing the environmental impact associated with travel to and from the site. The key element of this plan will be reducing the reliance on private vehicles and maximising the use of public transport and other sustainable modes of transport.

2.2 Benefits of a Work Place Travel Plan

The WPTP can bring numerous benefits for the environmental, social, and economic context of this data centre development. These include the following:

- The health of workers and visitors within the site by decreasing stress, travel costs, time, and broadening travel choice;
- Reducing traffic congestion;
- Improving air quality; and
- Health benefits by incorporating exercise into daily travel and an improved quality of life.

2.3 Work Place Travel Plan objectives

The objectives of a WPTP are:

- **Encourage the use of more active and sustainable transport modes** i.e., walking, cycling, utilising public transport (buses, trains and light rails), and car sharing in place of the higher energy consumption travel modes such as single occupant car travel and taxi. This generally requires improving the quality of travel choices;
- **Raise awareness of sustainable modes of transportation** for employees or visitors who commute to, from and within the site;
- **Reduce traffic congestion and air pollution** around the site to enhance safer and more enjoyable journeys;
- **Travel Demand Management** which reduces the need for energy intensive car, taxi, or air travel by combining journeys for different purposes, travelling to alternative closer locations, or using other means of communications e.g., audio conferencing, video conferencing and working at home or other off-site locations using email or wireless telecommunications; and
- **Develop, implement, monitor, evaluate and review** the progress of the travel plan strategy.

2.4 Who does the Work Place Travel Plan apply to?

The WPTP can be applied to all staff and visitors travelling to and from the development.

3. Site-specific transport assessment

3.1 Existing mode share

2016 travel to work ABS Census data for the Statistical Area Level 2 (SA2) – Prospect Reservoir was analysed to understand current travel patterns of the users travelling to the development site and its surroundings. There is currently a high private vehicle mode share due to the lack of sufficient public transport options, walking and cycling infrastructure as well as distance from residential areas. 2021 ASB Census data was not considered a viable dataset due to the impacts of the COVID-19 pandemic.

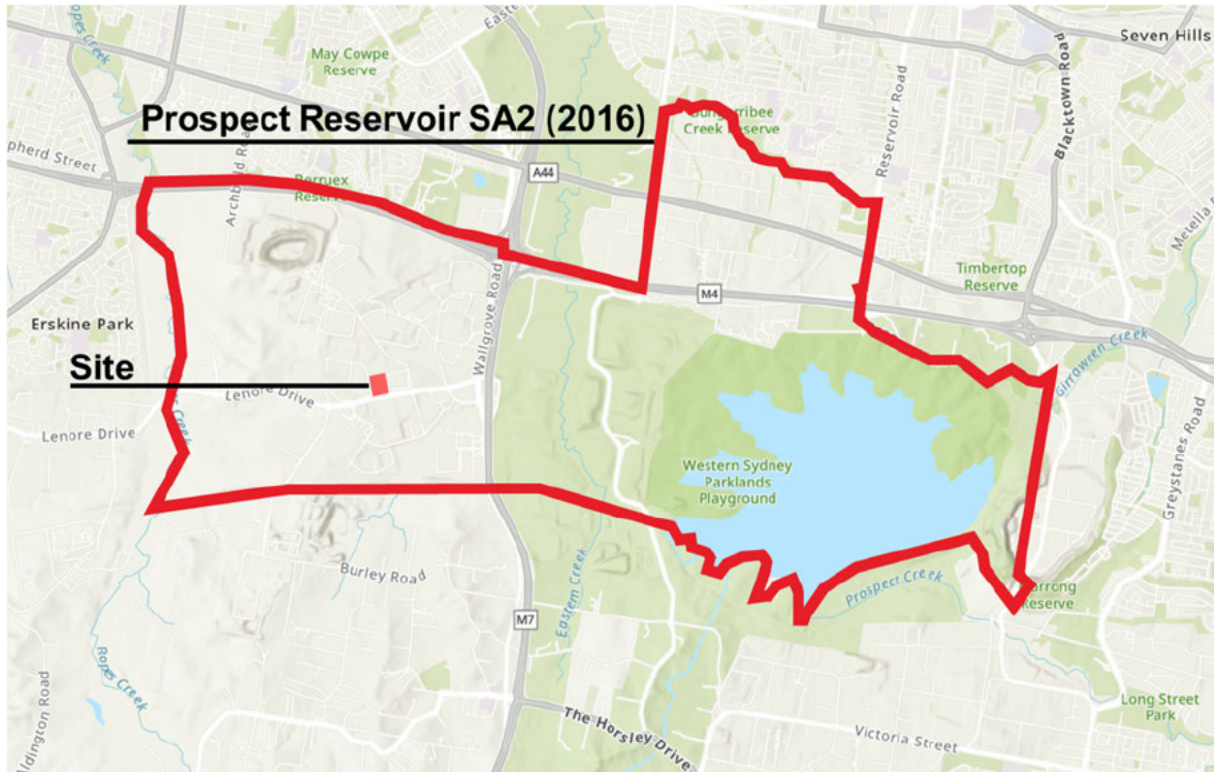


Figure 5: Prospect Reservoir SA2 containing SYD025 site (ABS, 2016).

The chosen mode of travel for employees is summarised below in Table 1. An extremely large percentage of work trips are made by car and motorbike within the SA2, suggesting that there is a significant need to reduce private car travel and increase the use of active transport modes.

Table 1: Existing travel to work mode share (ABS, 2016).

Mode	Existing mode share (%)
Private Vehicle	97%
Public Transport	3%
Bicycle	<1%
Walk	<1%

3.2 Local environment for pedestrians and cyclists

There are currently good pedestrian facilities surrounding the site. On Old Wallgrove Road there is a shared path and pedestrian-only footpath along the north and south side, respectively.

There is a pedestrian-only footpath on the eastern side of Eastern Creek Drive, forming the western boundary of the site. There are no pedestrian facilities on the western side of Eastern Creek Drive. These pedestrian facilities form a good connection between the site entrance on Eastern Creek Drive and bus services along Old Wallgrove Road.

The shared path along Old Wallgrove Road provides a viable east-west cycling corridor, however, is discontinuous on approach to Wallgrove Road / M7 to the east and Erskine Park Road to the west. Due to the site location being removed from residential areas and the lack of continuous shared path infrastructure, there is a high reliance on private vehicle use as the primary mode of transport.



Figure 6: Existing cycling infrastructure surrounding the site (Cycleway Finder, June 2025).

To facilitate improved active transport (walking and cycling) uptake, the Echidna development will provide a total of six bicycle parking spaces (three bike rails) in a convenient location which is safe and secure with an end of trip facility. Based on usage at comparable datacentres the number of cycle parking spaces is considered to be appropriate given the industrial location far from residential developments. If the demand for cycling increases during annual monitoring additional cycle parking spaces can be provided.

3.3 Public transport

Two bus stops are located on Old Wallgrove Road with the closest being approximately 180m from the site entrance (Figure 7). These two bus stops serve routes 738 and 835 which provide connections to the Liverpool-Parramatta T-Way, Mount Druitt Station and Rooty Hill Station. Priority jump lanes provide priority to bus services along Old Wallgrove Road.



Figure 7: Bus stops serving the site.

There is currently a lack of Monday, Saturday and Sunday services and an approximate four-hour gap between AM and PM periods. The development will operate 24 hours a day, seven days a week consisting of two 12-hour shifts. Shift changes are expected to occur at 6:00 AM and 6:00 PM. Although shift changes fall within the currently provisioned bus service periods, the lack of Monday, Saturday and Sunday service discourages the use of public transport offerings for workers and visitors. The service frequency of these routes is shown in Table 2.

There are no other public transport options available for the site.

Table 2: Bus routes and frequency.

Route no.	Direction	Route description	AM		PM	
			Service Period	Frequency	Service Period	Frequency
738	Eastbound	Mount Druitt to Eastern Creek via Rooty Hill (Loop Service)	4:36 – 10:08 AM	33 minutes	2:17 – 7:39 PM	36 minutes
	Westbound		4:32 – 10:03 AM		2:13 – 7:34 PM	
835	Eastbound	WSU Penrith To Prairiewood	6:32 – 9:34 AM	30 minutes	3:02 – 6:37 PM	30 minutes
	Westbound	Prairiewood To WSU Penrith	5:38 – 8:45 AM	25 minutes	2:46 – 5:17 PM	30 minutes

4. Design features provided by the development

4.1 Walking connections

The pedestrian-only footpath along the eastern side of Eastern Creek Drive directly connects to the recently completed site entrance to Building 1 and 1a (Figure 8). Once the development (Echidna) is complete, there will be a continuous pedestrian path with appropriate crossing facilities such as zebra crossings through the vehicle circulation paths to all admin blocks and operational facilities for worker and visitor access.

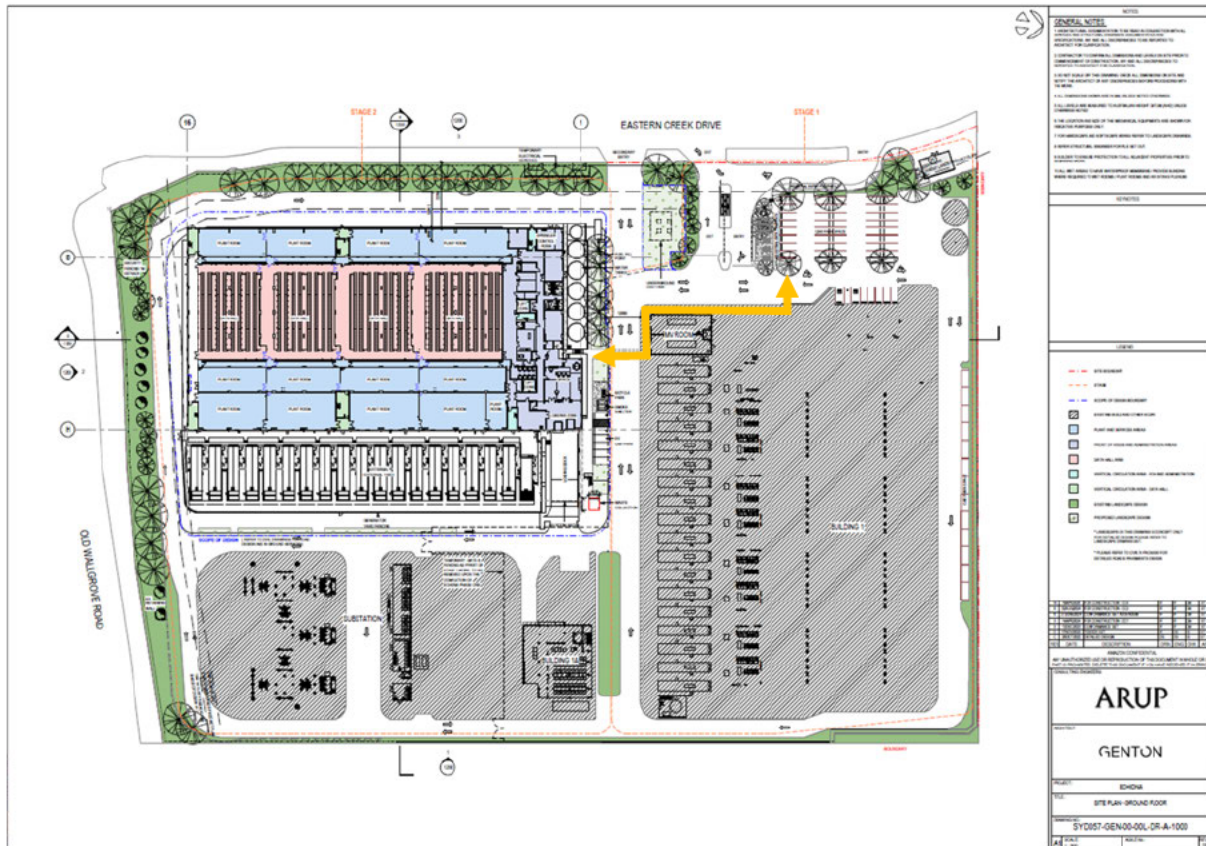


Figure 8: Safe route for pedestrians to walk between the Building 2 (Echidna) and the car park and site entrance.

4.2 Facilities for cyclists

Bicycle facilities and end of trips facilities within the site have been developed with consideration of local planning controls and the demands related to the proposal. A total of six bicycle spaces will be provided as part of the Building 2 (Echidna) development. The office component of the proposal will also include an end of trip facilities (comprising showers, change rooms and day locker facilities) to complement the bicycle parking.

4.3 Car parking

The 84 max car parking requirement as set out by the State Environmental Planning Policy (SEPP) - Eastern Creek Precinct Plan (ECP) is considered excessive due to the low number of staff requirements for operation of Building 2 (Echidna).

At any one time, Building 2 (Echidna) accommodates 36 staff and 2 visitors, requiring 38 parking spaces. Due to increased staffing since the original DA submission of Buildings 1 and 1a, 6 additional spaces have been provided for Building 2 (Echidna), meeting the total requirement of 38 spaces. This provision was

outlined in the 2023 Arup Traffic and Transport Technical Report and is summarised in Table 3 and illustrated in Figure 9. Four of the total site car parking spaces (70) will be designated for parking for people with disabilities and are DDA compliant (minimum of 2% of car parking spaces).

Table 3: Car parking provided.

Building	Parking Spaces Provided as part of original DA	Parking Spaces Provided as part of SSD
Building 1	28	-
Building 1a	4	-
Building 2 (Echidna)	32	6
Total	70	

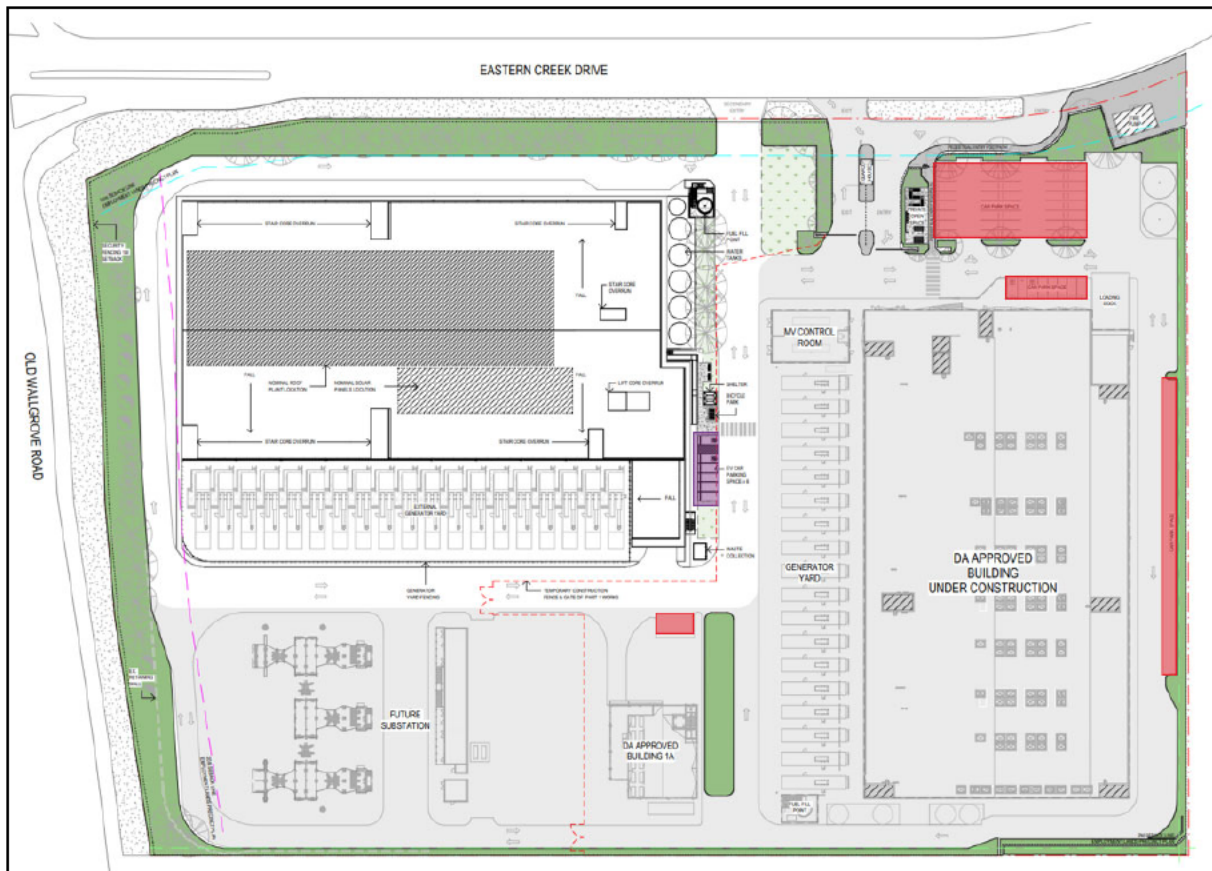


Figure 9: Car parking locations.

5. Operational opportunities to improve transport choices

5.1 Target mode share

Planning for the proposed data centre development is based on the principle of achieving an increased usage of public transport and active transport as methods of travel to and from the site. The Work Place Travel Plan is a constant evolving strategy which seeks to continually improve the way staff travel to work by choosing more sustainable modes.

A mode share target has been developed based on the 2016 ABS Census Journey to Work data and the existing frequency and availability of surrounding public and active transport connections to the site. A slight increase in uptake of public transport, walking and cycling is envisaged.

Table 4: Target mode share for the SYD057 data centre.

Mode of Travel	Existing Mode Share (%)	Target Mode Share (%)	Change (%)
Private Vehicle	97%	92%	-5.0
Public Transport	3%	6%	+3.0
Bicycle	<1%	1%	+1.0
Walk	<1%	1%	+1.0

5.2 Promotion of walking

The WPTP aims to promote walking as a form of sustainable travel from other points of interests such as the bus stops on Old Wallgrove Road.

Staff and visitors should be provided access to the Travel Access Guide (TAG) containing a legible map that details surrounding public transport linkages within a reasonable walking distance. TAGs can be distributed via a range of digital platforms including staff portal/ site's internal database. A TAG has been prepared for Echidna to show the latest public transport services in Appendix A.

5.3 Promotion of cycling

As highlighted in Section 3.2 and Section 4.2, the Echidna data centre has access to the shared cycle paths on Old Wallgrove Road – providing an east-west connection to residential areas like Erskine Park to the west. A maximum of 36 staff expected on-site at any one-time during a typical day are provided the provision of six bicycle parking spaces along with an end of trip facility.

Staff and visitors should be provided with access to cycling maps indicating surrounding bicycle paths and infrastructure. This will allow cyclists to assess route options and plan how they cycle to work. It may also act as a prompting tool to encourage staff and visitors to consider cycling as an option.

5.4 Promotion of public transport

Using public transport as a mode of travel to and from the site can bring cost benefits for individuals along with wider benefits from an environmental, social and economic perspective. Currently there is a very low uptake of public transport usage by workers in the relevant SA2. Although there are no bus services operating on Mondays, Saturdays and Sundays, bus services are provided along Old Wallgrove Road during shift changes (Tuesday – Friday). Although not ideal, this level of service provides a public transport option to staff and visitors.

To boost the use of public transport, staff and visitors should be provided with access to a legible map outlining surrounding public transport linkages. This advertises and promotes public transport and prompts

staff and visitors to consider public transport as their first transport option when travelling to and from the proposed data centre.

As an additional measure, permanent employees in Australia are offered reimbursement of public transport fares up to a monthly limit, through the AUS Commuter Benefit Program. Eligible employees are to be made aware during staff onboarding and annually through internal events to promote sustainable travel.

5.5 EV charging facilities

The transition to electric vehicles and the phasing out of fossil fuel use are key strategies to reduce emissions and move to a low carbon future. Consideration is given to the Future Transport Strategy 2056 which encourages the modal shift to active and public transport and electric vehicle use.

Although the Conditions of Approval for the SSDA do not define the number of EV charging stations required, two EV charging stations have been provided for the combined use of the site (Buildings 1, 1a and 2) to promote the use of low-emission vehicles supporting the total 70 car parking spaces provided.

5.6 Carpooling

Carpooling will be encouraged amongst staff, with parking bays prioritised for those who are carpooling, through stencils marking the specific bays.

5.7 Demand shifting measures

The WPTP aims to redistribute demand accessing the development. Rather than having typical peaks for commercial workers accessing the site (typically between 8:00 – 9:30 AM and 5:00 – 6:30 PM), the following measures aim to make travelling to the data centre more convenient via public transport and reduce private vehicle usage.

During the peak periods (7:00 – 9 AM and 4:00 – 6 PM), public transport usage can be congested which can deter people from using public transport. Public transport services are less congested during the inter-peak and of peak periods and may offer a better experience for commuters. Although shift changes are expected to occur at 6:00 AM and 6:00 PM, staff can be given the option by the employer to work under flexible working hours allowing them to arrive and work and leave work during the shoulders of the peak. Consideration of the limited bus services should be considered. Spreading travel demand may also be limited by the operational constraints of operating a data centre (e.g. certain equipment testing is restricted to specific hours of operation).

5.8 Marketing and Promotion

Marketing and promoting the benefits of sustainable travel alternatives is crucial when encouraging staff to adopt the WPTP objectives. It is essential that staff and visitors are made aware of the WPTP at an early stage to emphasise the need to reduce single occupancy trips through the Travel Access Guide (TAG) which will be available via the internal intranet site.

In addition, green travel promotional events will be promoted internally to encourage sustainable travel. Annual events have been reported to be a success with higher participation rates as opposed to multiple events throughout the year.

6. Administration

A part of an effective WPTP is to nominate personnel to take the administration role, typically undertaken by a designated representative from the building operator to administer and champion the plan. This member of staff can gather feedback from relevant site teams/ personnel as required.

If the tenancy changes the Travel Plan responsibilities specified within this WPTP will be handed over to the new tenant through a briefing session.

6.1 Monitoring and reviewing

The WPTP is a constant evolving strategy, and its success will rely on consistent monitoring and review. The WPTP will be reviewed every year by the Operational Environmental team. Although the overall goal of the WPTP is to educate and encourage site users to adopt sustainable travel modes, the specific targets and initiatives used to achieve this goal may be reviewed and updated over time.

Target setting should aim to reflect an ambition for continued progress. Assessing the provided targets and identifying if they are being met will provide opportunities to redefine targets. Travel survey questionnaires can be distributed to staff and day visitors to understand travel patterns. Assessment of this data should be undertaken by the designated WPTP representative to understand the changing travel patterns and re-evaluate benchmarking mode share targets.

Additionally, meetings can be held to undertake reviews of measures that are in place for the site. The objectives provided in the WPTP can act as measures of success and may also be used to identify potential refinements.

6.2 Roles and responsibilities

As part of the implementation and administration of the WPTP, roles and responsibilities have been defined for the Operational Environmental team as shown below.

Table 5: WPTP roles and responsibilities.

Operational Environmental Team	Responsibility
Data Centre Engineering Operations (DCEO)	• Maintain end of trip facilities at each site. • Maintain EV charging at each leased / owned data centre. • Maintain walking and cycling maps, and public transport information within public areas of DC (Lunch room, security lobby). • Maintain generally WPTP information on SYD Green Travel Plan Wiki.
Environmental Team	• Monitor compliance of SYD WPTP with planning commitments and consent conditions for each site. • Review SYD WPTP (this document) every year. • Monitor compliance with any additional regulatory requirements.
InCommunities /Global Real Estate and Facilities (GREF)	• Support one annual event in SYD cluster to promote sustainable transport or as required by individual Development Control Consent of Approval.

The WPTP should be appropriately funded and resourced by the Operational Environmental team for a period of 5 years.

An implementation plan has been provided which includes the initiatives and incentives within the WPTP. This will be updated on an annual basis and when future transport services are upgrades and will be managed by the Environmental Team.

Table 6: Implementation Plan

Initiatives	Completion date
Car parking spaces (including EV spaces)	Install prior to occupation
Bicycle parking spaces and end of trip facilities	Install prior to occupation
Promotion of TAG	Issue as part of the onboarding process to all staff
Encourage use of public transport	Offer AUS Commuter Benefit Program to all eligible employees during onboarding and annually through internal events to promote sustainable travel
Encourage the use of carpooling	Provide stencil signage at bays to encourage carpooling prior to occupation
Flexible hours	Shift changes expected to occur at 6am and 6pm, but staff will be given the opportunity to work under flexible working hours allowing them to arrive to work and leave work during the shoulders of the peak
Green travel promotional events	Promoted internally annually to encourage sustainable travel
Travel Survey	The Travel Survey (Appendix B) should be undertaken by the Operational Environmental team 3 months post-occupancy to identify the staff travel origin and destination patterns and to inform strategies that help to encourage more sustainable transport choices to/ from the site.
Annual monitoring	Review the progress of the initiatives annually and update WPTP/ TAG when future transport services are upgraded for a period of 5 years post occupation.

A.1 Appendix A – TAG example

Overview

This guide is designed to promote safe, sustainable, and accessible travel to work. It details how you can walk, cycle, take public transport, and drive, and lists available amenities for use.

Active ways to get to work



Walking

Walking is a sustainable travel option for nearby points of interest. Pedestrian only footpaths run along Old Wallgrove Road, ensuring safe access to bus stops.

The site's internal pedestrian network offers a secure and walkable environment, featuring dedicated pedestrian paths and crossing facilities.



Cycling

Cycling to the data centre is strongly encouraged for local staff and visitors. Shared cycle paths run along Old Wallgrove Road, providing an east-west connection to residential areas like Erskine Park and St Clair to the west.

We also provide end of trip facilities to ensure an easy and comfortable journey. This includes:



6 secure bicycle parking spaces near the site entrance, next to Building 2



2 showers (1 accessible)

Refer to Cycling Facilities Map on following page.

Public transport

Permanent employees in Australia are offered reimbursement for public transport fares through the AUS Commuter Benefit Program.

Staff may be eligible for flexible start and finish times to avoid peak hours. Consideration should be given to limited bus services. Please plan journeys using Trip Planner at transportnsw.info



Bus

There are two bus stops located on Old Wallgrove Road, just 2-minutes walk away. These stops serve routes 738 and 835, offering connections to:

- Mount Druitt Station (~40 minutes away)
- Rooty Hill Station (~50 minutes away)
- Liverpool-Parramatta T-Way (~1.5 hours away)

Bus route	Operating days	Peak hour frequency
738	Monday-Friday	30 minutes
835	Monday-Friday	30 minutes

Service routes and timetables for buses and trains are available on Trip Planner at transportnsw.info

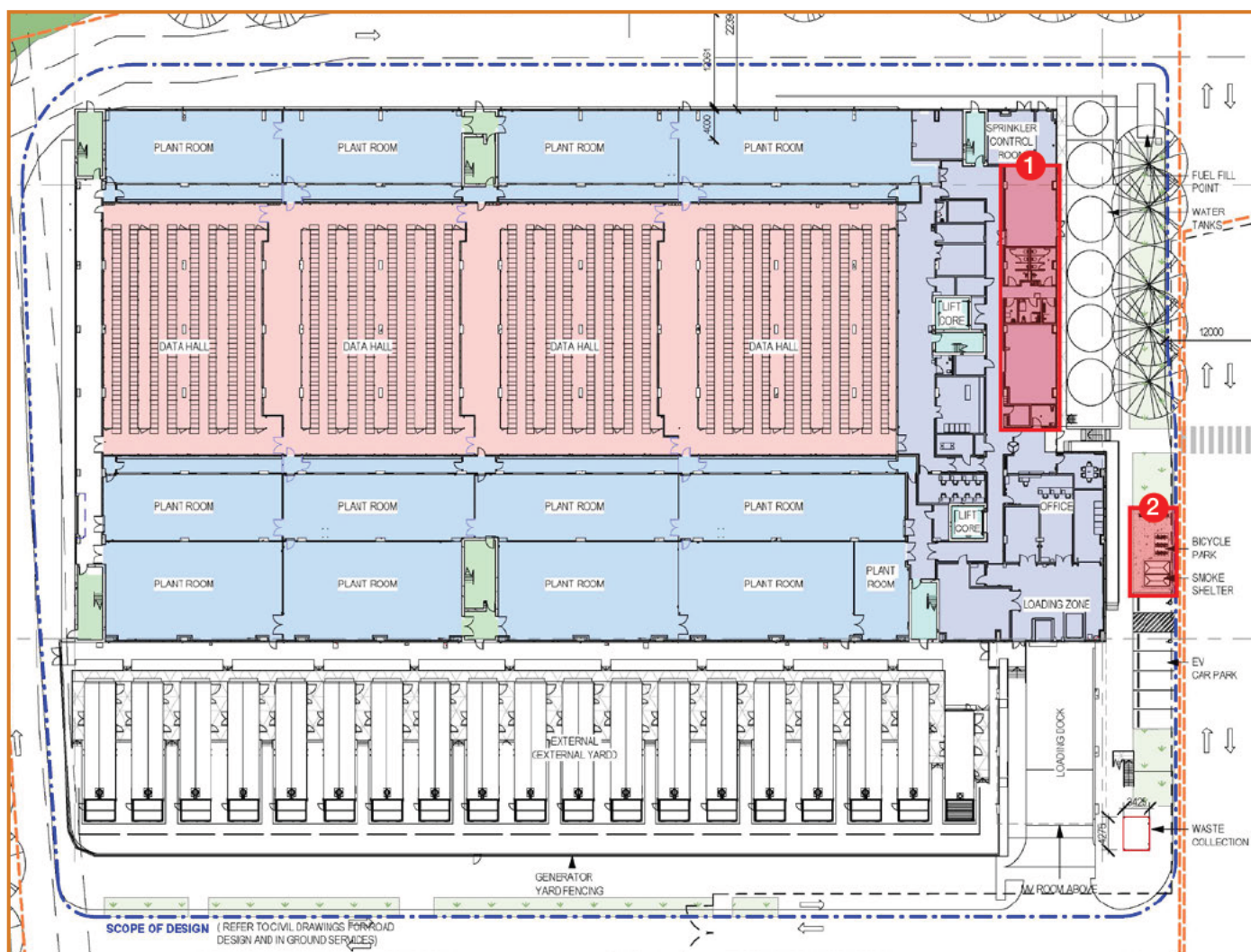


Train and Metro

Mount Druitt Station and Rooty Hill Station are the closest train stations, within a 15-minute commute via bus routes 738 and 835. The T1 North Shore Line provides connections to Parramatta CBD and Sydney CBD, while the T1 Western Line provides connections through to the Blue Mountains.

In 2027, the Western Sydney Airport Metro is expected to open, with metro services from St Marys Station. The metro is accessible from site via the 738 bus to Mount Druitt Station and a train to St Marys. The metro will provide connectivity across Western Sydney, with services every 5-minutes during peak hours.

Cycling Facilities Map



Key

- 1 Change rooms
- 2 Bicycle parking

Driving



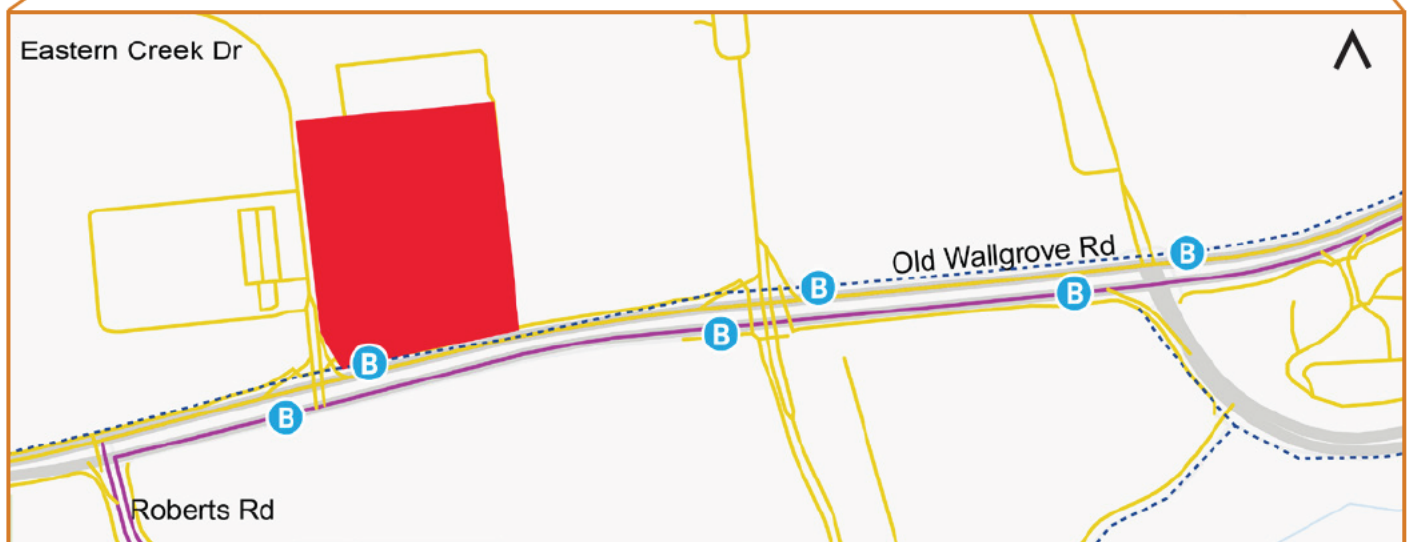
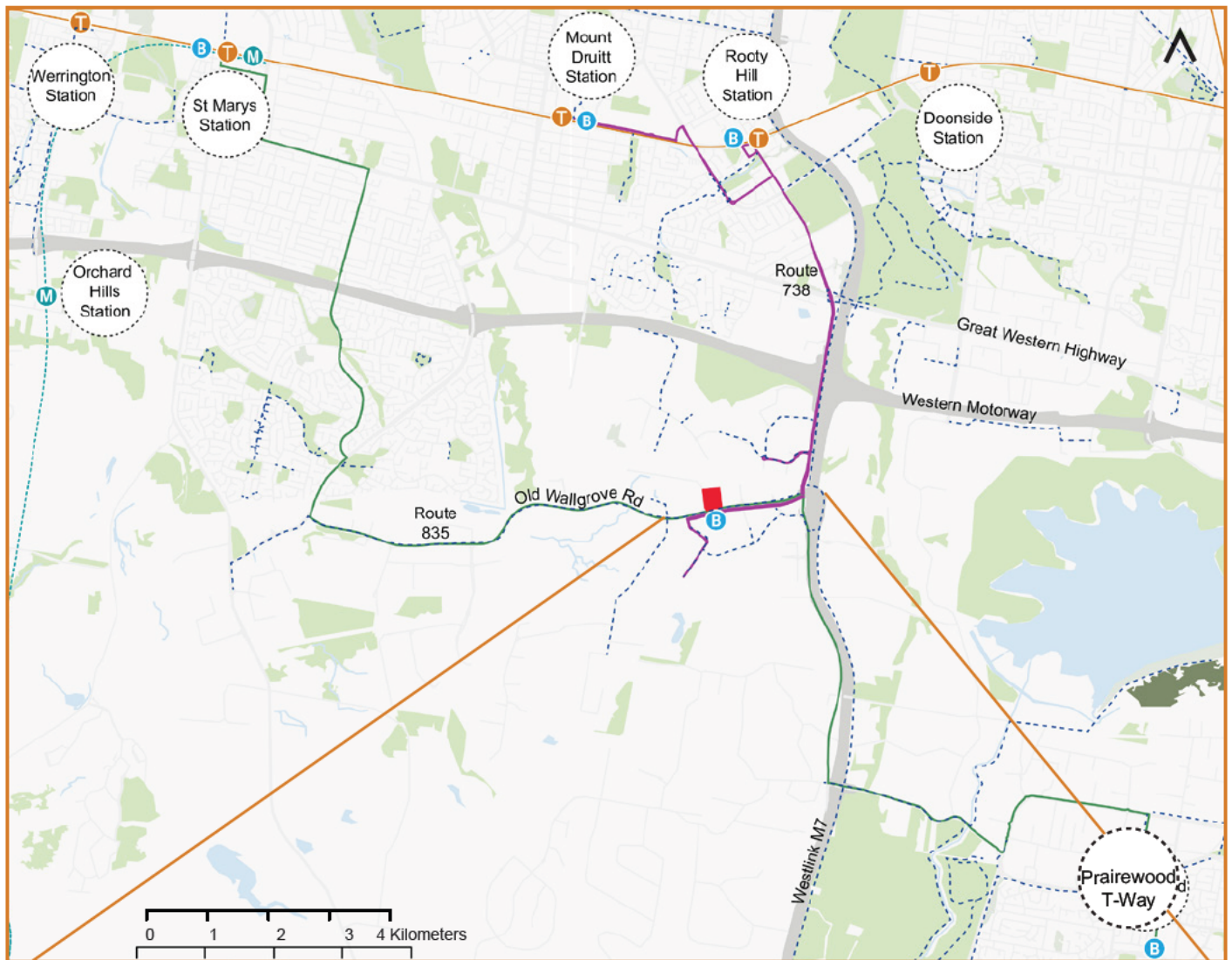
Electric vehicles

Electric vehicle parking is provided, with 6 free electric vehicle charging stations. These are spread across each building. We support the use of low-emission vehicles to support the shift towards a more sustainable future.



Cars

The carpark off Eastern Creek Drive is only for staff and visitors. To reduce private vehicle use, staff are encouraged to carpool. Accessible bays and carpooling bays are prioritised in the carpark and marked for easy identification.



Key		
 site	Bus routes	Trains and metro
Cycleways	 835 WSU Penrith to Prairiewood	M Sydney Metro WSA Station (future)
 Shared paths	 738 Mount Druitt to Eastern Creek	 Sydney Metro WSA (future)
 Footpaths	B Bus stop	T Train Stations
		 Rail line

A.2 Appendix B – Travel Survey Example



Online staff travel survey sample

DESCRIPTION: On-line self-completion travel surveys are a popular method to collect information for a Travel Plan as they get quantifiable and comparable data about how people travel and their barriers to change. They are relatively easy and inexpensive to design, distribute, complete and analyse using online packages such as Survey Monkey and SurveyGizmo.

A sample on-line travel survey is provided below. The text in *<italics>* provides design instructions or navigational guidance and is not part of the final survey.

Note: This survey is primarily applicable for office-based staff. It may need to be modified to suit employees working shifts. Not all questions may be applicable to your organisation or employees.

Introduction:

Hello and welcome to the travel survey!

Complete the survey and you can *<insert incentive eg. go into the prize draw to win a \$100 Opal Card, \$100 store vouchers, etc>*

No matter whether you walk, cycle, drive or catch the bus to work – and even if you didn't come to work today – we need you to complete this!

It won't take more than 5 minutes, promise. You'll find the results on our intranet site soon.

Thanks,

Your Travel Plan team

First a bit about you

1. What is your age in years?

	16 - 17		35 - 44		Over 65
	18 - 24		45 - 54		
	25 - 34		55 - 64		

2. What postcode do you live in?

(Free text)

Your journey to and from work

3. In an average week, on how many days do you commute for work?

	One		Four		I predominantly work from home or remotely
	Two		Five		
	Three		More than five		

<Questions 4 – 5 apply if the survey is going to multiple work places across the precinct. If it is being deployed by one organisation only, these questions are not required.>

4. What is the postcode where you normally work?

(Free text)

5. What department / business unit do you work for?

We ask this to identify travel trends within your organisation. If you do not wish to answer, please type "blank". If you are self-employed, please type "self".

(Drop down list)

Your journey to and from work

6. What time do you typically arrive at work? <adjust as needed to include relevant shifts>

	Before 06:00		07:30 – 07:59		09:30 – 09:59
	06:00 – 06:29		08:00 – 08:29		10:00 or later
	06:30 – 06:59		08:30 – 08:59		
	07:00 – 07:29		09:00 – 09:29		

7. What time do you usually travel home? <adjust as needed to include relevant shifts>

	Before 15:00		16:30 – 16:59		18:30 – 18:59
	15:00 – 15:29		17:00 – 17:29		19:00 or later
	15:30 – 15:59		17:30 – 17:59		
	16:00 – 16:29		18:00 – 18:29		

8. What is your main mode of transport when travelling to and from work? Please choose the mode that you use for the greatest distance.

	Walk or run		Light rail		Car (as passenger)
	Bicycle		Ferry		Car pool
	Bus		Car (as driver/sole occupancy)		Motorbike or Moped
	Train		Car (as driver with passengers)		Taxi or Rideshare (e.g. Uber)

Your journey to and from work

9. Do you ever work from home?

☐	Yes	☐	No
--------------------------	-----	--------------------------	----

10. On average, how many times do you work from home in one month?

(Free Text)

11. Do you have a disability or impairment that has an impact on how you travel?

☐	Yes	☐	No
--------------------------	-----	--------------------------	----

12. Do you have childcare commitments that have an impact on how you travel?

☐	Yes	☐	No
--------------------------	-----	--------------------------	----

13. Are you entitled to a free parking space at your place of work?

☐	Yes	☐	No
--------------------------	-----	--------------------------	----

Your potential for behaviour change

Significant improvements are being made across the transport network in Sydney. These changes may have an impact on your journey to work. To improve your journey, how likely is it that you will do the following to make your journey more comfortable and reliable?

14. Choose another mode to travel to work, e.g. switching from driving to public transport or from public transport to walking or cycling.

☐	Very likely	☐	Neutral	☐	Very unlikely
☐	Likely	☐	Unlikely	☐	Not possible

15. Change the timing of the journeys you make to avoid the busiest periods if possible given your work conditions.

☐	Very likely	☐	Neutral	☐	Very unlikely
☐	Likely	☐	Unlikely	☐	Not possible

Your potential for behaviour change

16. Reduce the number of times you travel to the office, e.g. by working from home if possible given your work conditions.

☐	Very likely	☐	Neutral	☐	Very unlikely
☐	Likely	☐	Unlikely	☐	Not possible

17. Reroute the way you take to and from work to avoid the busiest areas.

☐	Very likely	☐	Neutral	☐	Very unlikely
☐	Likely	☐	Unlikely	☐	Not possible

Your comments and interest in updates

18. Do you have any general comments on how you currently travel or how you would like to travel?

(Free text)

19. Would you like to ... <refer to incentive, for example: be entered into the draw for the chance to win a \$100 Opal Card? To view the terms and conditions for the prize draw, please [click here](#) >.

(Tick box)

20. If yes, please enter your email address.

(Free text)

Would you like to receive updates from the Travel Plan team bringing you relevant travel advice (e.g. information on new services)?

☐	Yes	☐	No
--------------------------	-----	--------------------------	----

21. If yes, please enter your email address to receive the updates you requested.

(Free text)

Closing

Thank you! To send your response, please click the 'Done' button below. Your responses will be collected and analysed by <insert> to help us create our Travel Plan. They will not be passed on to any third party. If you have any additional feedback on travel or transport to our workplace, please email us on <insert>, give us a call on <insert> or pop in and see us at <insert>.

DONE

From: [Chris Slenders](#)
To: [Bryony Dalton](#)
Cc: [Sophia Grieve](#)
Subject: Project Echidna WPTP
Date: Friday, 26 September 2025 10:40:08 AM
Attachments: [Outlook-bvgwxgu4.png](#)
[SYD057-RP-Y-7009-XX-XX-XXXX-ARP Green Travel Plan - Final 250916.pdf](#)

You don't often get email from chris.slenders@transport.nsw.gov.au. [Learn why this is important](#)

Good morning Bryony,

Transport is satisfied with the updated WPTP attached and has no further comments.

Regards,

Chris Slenders

Principal Transport Planner, Precinct Operations
Operations Planning
Coordinator-General Division

Transport for NSW



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Appendix B. Landscape Management Plan

Eastern Creek DC – Echidna

Landscape Management Plan

Issue 01

Arcadia Project Number: 22-869 Eastern Creek DC

Revision	Date	Approved by
Issue 01 – CC	10.10.2025	Chris Tidswell

ARCADIA

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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

The Landscape Management Plan (LMP) has been developed to guide the ongoing care, functionality, and sustainability of the site's landscape elements and environment. It aims to ensure the long-term health and resilience of both the landscape features and the experience of its users. This plan sets out a holistic framework for maintaining hardscape and softscape elements, inclusive of built infrastructure, furniture, irrigation systems, planting, and on-site waste practices.

By outlining clear strategies for maintenance, monitoring, and management responsibilities, the LMP supports ecological integrity, visual amenity, and safety across the site. It serves as a reference document for all stakeholders involved in the management of the landscape, contributing to its continued usability and preservation.

1.0 INTRODUCTION & GENERAL REQUIREMENTS

1 GENERAL

1.1 SCOPE OF DOCUMENT

This document sets out the minimum requirements for the ongoing operational landscape management of the overall site and to address the requirements under **SSDA Condition B44 and B45**.

The Landscape management plan complies to the following:

- (a) is prepared in consultation with Council;
- (b) details the species to be planted;
- (c) describes the monitoring and maintenance measures to manage revegetation and landscaping works;
- (d) is generally consistent with:
 - (i) the Landscape Plans and Landscape Screening provided in the additional response to submissions
 - (ii) the applicant's management and mitigation measures at Appendix 2.

The landscape management plan describes the ongoing monitoring and maintenance measures to manage the landscape across the site. This plan **builds on and aligns with the SSDA deliverables (Landscape Report and Drawings)**, which included a Landscape Maintenance/Management section responding to the EIS/SSDA requirements.

Contractual relationships: Responsibilities and duties of the principal, contractor and contract administrator are not altered by requirements in the documents referenced in this plan of management.

1.2 CROSS REFERENCES

General

This Landscape Management Plan shall be read in conjunction with the landscape architectural plans, specification, scope of works and relevant documentation. Including but not limited to the following:

- Operational Environmental Management Plan, Project Echidna – SSD47320208, Reference: 288255-24(2025)

Layouts of service lines, plant and equipment shown on the drawings are diagrammatic only, except where figured dimensions are provided or calculable.

Before commencing work:

- Obtain all necessary information and approvals
- Coordinate in conjunction with all relevant stakeholders.
- Locate all services by via services search and or physical pot holing

1.3 AIMS

Responsibilities

To maintain all designated areas within the contract boundary for the full duration of the landscape maintenance agreement, in accordance with the approved scope of works across the site.

Scope of responsibilities

- Maintenance of all landscape areas as per specification
- Supply and spreading of fertiliser to all planting areas as per specification
- Pruning, trimming and tree surgery as required or by approved arborist.
- Pest and disease control for planting areas as required. Treat all infestation as soon as practical after identification
- Replacement of dead or failed plants
- Maintenance of irrigation systems as per manufacturer instructions
- Removal of rubbish and debris in garden areas
- Keeping of a log book or equivalent. Ensure updates provided to Project Manager after each visit
- Scheduled maintenance reports to be provided monthly during the initial six-month period, transitioning to quarterly reports thereafter.

Maintenance procedures

All maintenance activities are to be carried out in accordance with approved horticulture and arborist best practices, as detailed in this document.

1.4 TESTING AND REPORTING REQUIREMENTS

- Weed, pest, disease and fungi management (*see Section 2.1 for testing and reporting requirements*)
- Plant health monitoring and reporting (*see Section 4 for testing and reporting requirements*)
- Soil testing and amendment (*see Section 3 for testing and reporting requirements*)
- Irrigation testing (*see Section 6 for testing and reporting requirements*)
- Furniture and fixtures (*see Section 8 for testing and reporting requirements*)
- Drainage monitoring (*see Section 2.3.3 for testing and reporting requirements*)

1.5 NOTICE

The service provider must notify the Superintendent and/or Building manager, as applicable, to arrange inspection of works. A minimum of 48 hours' notice is required.

Public amenity: Where works may affect public access or amenity, notice must be given by the Thursday prior to the week in which the work is scheduled to occur.

Inspection activities are to be programmed accordingly to ensure required approvals do not delay the project or affect other stakeholders.

Inspection schedule

Inspection point / hold point	Approved Release Authority
Any materials to be used in landscape areas must be approved prior to implementation.	Building manager
Addition of fertilizer to garden areas	Building manager/Soil test results (Refer to Section 2.2.2)
Replacement mulch	Building manager
Replacement soil	Building manager/Soil tests to Soil scientist/Engineer
Replacement of Plants	Building manager/Planting schedule
Additional or updating furniture	Building manager
Inspection of the Completion of all fixture and furniture installation	Building manager
Inspection of all lighting fixtures	Building manager

1.6 LOG BOOK

Landscape contractor to complete logbook entry on **each day of site attendance for landscaping works**, and provide a minimum **fortnightly summary of logged entries** of landscaping works. All actions listed below require a logbook entry. Upon request, make the logbook available for inspection. Please note that more frequent, short, occasional inspection should result in less maintenance work when problems are observed earlier than they might otherwise have been seen.

2.0 LANDSCAPE MANAGEMENT SCOPE

2.1 GENERAL

2.1.1 WEED CONTROL

Prior to installation, soil should be as weed-free as practicable to reduce ongoing weed management requirements.

The service provider shall perform all aspects of weed management in the planting beds necessary to support healthy plant growth and to optimise the appearance of the gardens. In this context, a weed is a plant that has not been specified in the design. The garden beds must therefore be maintained free of non-specified plants. The method of weed control is at the discretion of the contractor but non-chemical methods are preferred. Given that mulch will be maintained at between 30-75 mm, weed proliferation is not expected to be problematic. Any weeds that do emerge from the mulch should be easily removed by hand. Where possible, selective herbicides should be applied where required with care. **Waste** associated to be collected and discarded in accordance with the Building's Waste Management Plan.

Where selective herbicides are deemed necessary, approval must first be obtained from the Superintendent and/or Building manager. Care must be taken to prevent spray drift from affecting non-target plantings. Treatments are to be carried out with appropriate Personal Protective Equipment (PPE), *and where feasible, scheduled outside of business hours* to minimise exposure to staff and site users. Only products formally approved for use on site may be used.

Program

- **Operational timing:** Landscaping contractor to ensure all planting beds and containers are to be maintained in a weed-free condition, as verified during fortnightly inspections. All weeding works are to be scheduled in consultation with the Superintendent and/or Building manager, ensuring minimal disruption to site use and access.
- **Control methods:** Weeds are to be removed from all designated planting areas via hand removal or application of an approved herbicide. The contractor is to provide a list of suitable products and management strategies for control of weeds in an environment occupied by sensitive receptors.
- **Chemical control:** The use of herbicides (e.g. glyphosate-based products such as Roundup) should be minimized. Any herbicide application must be approved in advance by the Superintendent or Building manager, with careful consideration of safety and environmental impact.

2.1.2 PEST, DISEASE AND FUNGI CONTROL

The service provider is responsible for the control of any pest or disease which may affect the planting areas. Soil health is a key factor in the prevalence of plant diseases. When soil conditions are conducive - for instance, with optimal moisture and temperature - pathogens may become active and widespread. However, imbalances such as excessive fertilisation, nutrient deficiencies, and variations in organic matter levels can also contribute to disease occurrence. **Suboptimal soil conditions** (caused by compaction, waterlogging, over-fertilisation, or installation of unsuitable soil types) may exacerbate the potential for disease and fungal activity. **Waste** associated to be collected and discarded in accordance with the Building's Waste Management Plan.

Chemical Controls

The application of pesticides or fungicides must be approved by the Superintendent or Building manager prior to use. Treatments are to be carried out with appropriate Personal Protective Equipment (PPE), *and where feasible, scheduled outside of business hours* to minimise exposure to staff and site users. Only products formally approved for use on site may be used.

Contractor Responsibilities

The appointed contractor is responsible for identifying and managing any pest or disease affecting vegetation within the internal landscaped areas.

Treatment Protocol

- Diagnose the issue promptly and accurately.
- Determine the appropriate treatment method and seek formal approval from the Superintendent.
- Apply the treatment consistently until the issue is resolved.
- Where hazardous products are required, treatments should occur outside of standard operational hours.
- Ensure public and staff safety: all chemical residues are to be safely cleaned or removed, and any waste (e.g., containers) must be responsibly disposed of to avoid environmental or safety risks.

Program

- **Reporting:** Upon identification of pest or disease affecting plant material, the contractor must immediately notify the Superintendent and/or Building manager.
- **Control methods:** Pests, fungi, disease are to be removed from all designated planting areas via hand removal or application of an approved insecticide/fungicide/and or pathogen control as required. The contractor is to provide a list of suitable products and management strategies for management of pests, fungi and disease.
- **Chemical Control:** Targeted application of insecticides, fungicides, or appropriate combinations may be undertaken based on the nature of the issue.
- **Operational Timing:** All pesticide and fungicide applications are to be scheduled in consultation with the Superintendent or Building manager, ensuring minimal disruption to site use and access.

2.2 TREES AND SHRUBS

2.2.1 PRUNING AND TRIMMING

To preserve both the visual coherence and functional integrity of the planted areas, routine management, pruning and shaping of plant material is required. The prune/shape requirements are to reflect the natural growth flowering and regrowth habit of the individual species. **Waste** associated to be collected and discarded in accordance with the Building's Waste Management Plan. This management includes the following:

Deadwood and foliage management

Removal of deadwood and spent foliage to support plant health and minimise visual clutter. Selected organic matter may be retained on the soil surface to mimic natural habitat conditions and contribute to soil organic content and microbiological activity.

Spatial clearance

Vegetation must be maintained to avoid encroachment into defined useable areas—particularly seating zones—to ensure accessibility and comfort for site users.

Functional and aesthetic pruning

Trimming may also be necessary to Improve light penetration within planting areas, enhance air circulation across densely planted zones, elevate tree canopies to allow for healthy understory development, refine plant form for aesthetic and ecological outcomes.

Seasonal and targeted interventions

Specific plant parts should be removed at appropriate times of year to limit ecological risk and enhance site management(i.e. tree fern fronds may require pruning prior to spore release, fallen fruits should be removed to mitigate fruit fly infestation risk).

Community engagement opportunities

The collection of berries or seeds—particularly from rare or endemic species—may be coordinated as an engagement initiative, allowing staff and occupants to cultivate specimens off-site, fostering connection with the habitats.

Program

Primary pruning/trimming operations are to be undertaken during Autumn and Winter, with spot treatments conducted on an as-needed basis throughout the year

- **Shrubs:** Prune following flowering periods as per species
- **Trees:**
 - o Prune to maintain the tree's natural form and character, under the supervision and/or guidance of an authorised representative of Superintendent/Building manager
 - o Remove diseased, damaged, or structurally compromised growth
 - o Prevent inter-branch contact and thin crowns where appropriate, maintaining a balanced canopy
 - o Ensure clear sightlines for user safety and optimal light conditions for plant health
- **Tree branch removal:**
 - o A qualified arborist is to be engaged and provide approval of works undertaken
 - o Remove only in accordance with AS 4373—2007 (R2020), *Pruning of amenity trees*
 - o Provide a minimum of 48h notice to building management prior to any tree branch removal works.
- **Operational timing:** All pruning/trimming works are to be scheduled in consultation with the Superintendent or Building manager, ensuring minimal disruption to site use and access.

2.2.2 FERTILISING

Fertilising program to be based on soil testing results.

Soil testing

Refer to Section 3.3 for soil testing frequency. Undertake soil tests as follows:

- At the commencement of the contract.
- Annual testing is suggested subject to the advice of the landscaping contractor and based on site inspection findings.

Soil pH adjustment

Apply additional fertilisers and soil conditioners as indicated from soil testing. Maintain a pH range of 5.5 – 6.5.

Shrubs:

- N:P:K ratio: Balanced 15:4.4:10.
- Apply 3- or 6-month slow release fertilisers (such as Nutricote/Osmocote ensure fertilisers are odourless) or liquid fertilisers (such as Thrive).
- Plant hormone adjustment may be required and should be done in accordance with good horticultural practices.
- Contractor may suggest alternatives; approval from superintendent / Building Manager is required to proceed.
- Rates: To the manufacturer's recommendation and cultivate into the soil 10-20 mm deep.
- Regular application: Each September and February.
- Ensure the appropriate dosage for sensitive native species.

Trees:

- Fertiliser type: Slow release or Liquid fertilisers for trees
- Type: Agriform 10 gram N:P:K 20:4.3:4.1.
 - o 3 tablets/plant over 500 mm in height, or
- Application: Apply pill to the root zone at a distance from the trunk equal to the spread of the foliage.
- Make holes 400 mm deep to take the pill. Backfill with sand, equally spaced around the plant.
- **Operational timing:** All fertilising work to be scheduled in consultation with the Superintendent or Building manager, ensuring minimal disruption to site use and access.

2.2.3 PLANT REPLACEMENTS AND REPLENISHMENT

Plant replacement to be required when plant death occurs or are showing signs of decline. Provide replacement and replenishment plants, as documented in accordance with the Landscape Management Plan. **Waste** associated to be collected and discarded in accordance with the Building's Waste Management Plan. This management includes the following:

Performance Criteria

Replacement is required for evergreen plants exhibiting one or more of the following conditions:

- o Complete death or irreversible decline
- o Loss of 50% or more of normal foliage density
- o Etiolated growth (e.g. excessive elongation, discoloration, bleaching)
- o Marked phototropism indicating poor placement or growing conditions (growth towards light)

Root zone and aeration

Aeration within planting areas is critical for overall plant vitality. Air movement during active growth phases enhances root development, as evidenced by comparative horticultural studies. Soil compaction or poor airflow must be corrected to improve uptake and resilience.

Replacement plant standards

All replacement specimens are to comply with the following minimum standards:

- **Species consistency:** Match to planting schedule by species/variety (*Refer to A-8111 - Materials and plant schedule*)
- **Quality:** Uniformly high-grade stock equal to the best commercially available
- **Form:** Representative of optimal growth for the species relative to pot/container constraints
- **Root system:** Balanced and vigorous root development supporting successful transpiration
- **Condition:** Free from stress indicators such as wilting, sun/shade damage, or deformation from nursery conditions
- **Health status:** Well-established, hardened-off plants with sound structure, pest-free, and disease-free
- **Pot bound checks:** Specimens must be inspected for root binding; pruning or replacement may be required to ensure viability

Plant Performance

- **Plants:** Grown to a standard that allows rapid establishment and growth to maturity.
- **Trees:** If a tree dies due to lack of or incorrect maintenance or for other reasons, this tree is to be replaced with one of similar size and shape. In the case an equivalent scale tree is unavailable; a smaller tree may be installed but only with the superintendent's/Building managers approval.
- **Maintenance:** Encourage and maintain healthy growth in accordance with this Operation Landscape Management Plan.

Program

Provide a suitable irrigation, pruning, fertiliser and monitoring program for all plant materials held by the supplier. Take precautions to safeguard the health and well-being of all plant materials before and including their delivery to the project site.

- **Placing/locating:**
 - o Remove the plant from the container with minimum disturbance to the rootball. Make sure that the rootball is moist.
 - o If required, root prune to make sure all circling roots have been either severed or aligned radially into the surrounding soil.
 - o Place the plant in its final position, in the centre of the hole and plumb, and with the topsoil level of the plant rootball level with the finished surface of the surrounding soil.
- **Fertilising:** Distribute pellets in planting beds and individual plantings, place fertiliser pellets around the plants at the time of planting.
- **Backfilling:** Backfill with topsoil mixture. Lightly tamp and water to eliminate air pockets. Make sure that topsoil is not placed over the top of the rootball, so the plant stem remains the same height above ground as it was in the container. Avoid mixing mulch with topsoil.
- **Operational Timing:** To be scheduled in consultation with the Superintendent or Building manager, ensuring minimal disruption to site use and access.

2.3 WATERING

2.3.1 NEW / REPLACED PLANTINGS

To ensure healthy establishment and longevity of newly placed plant stock, see following watering requirements:

Timing of Watering

Avoid irrigation during peak heat periods - particularly the hottest hours of the day during summer. Early morning watering is strongly recommended to reduce evaporation.

Initial Establishment

All replacement plants must be thoroughly watered prior to planting, immediately following installation, and subsequently as required to support sustained, stress-free growth during the establishment phase.

Regulatory Compliance

The watering regime must comply with current Federal and State Government water restrictions and environmental guidelines. Coordination with local water authorities, ensuring adherence to site-specific allowances and limitations.

Supplementary Misting

Misting should accompany routine watering or be alternated every second watering cycle to aid in maintaining plant health and longevity.

2.3.2 PROGRAMMING

Automated systems

- Automated systems programmed to align with periods of optimal water pressure and absorption—typically during early mornings or cooler parts of the day. Programming should aim to minimise water usage while ensuring effective coverage
- Watering cycles to consider/avoid interference with site access and functionality, including pedestrian pathways, seating zones, and vehicular traffic flows

2.3.3 DRAINS

All drainage structures, including pits and covers, are to be inspected and cleaned regularly to ensure functionality and prevent water accumulation or overflow.

Inspection Frequency

As required to ensure that all overflow points remain unobstructed; inspections to occur at minimum fortnightly intervals.

2.3.4 IRRIGATION

Refer Section 6 Irrigation

2.4 MULCHING

2.4.1 GENERAL

General management

- Mulch materials must be removed from all pedestrian zones to prevent tripping hazards and maintain a consistently tidy appearance.
- Visual inspections to be conducted weekly to ensure mulch is contained within planting beds and does not encroach on surrounding hardscape surfaces.

Mulch depth and coverage

- Maintain a consistent mulch depth between 30-75mm across all designated planting areas.
- Mulch is to provide full coverage of all planting beds to suppress weed growth, regulate soil temperature, and retain moisture.

Placing mulch

Place mulch to the required depth and clear of plant stems. After settling, mulch to meet the following criteria:

- **Even grading:** Smooth and evenly graded between design surface levels.
- **Level transitions:** Flush with adjacent finished surfaces
- **Slope:** Slope mulch towards the base of plant stems in plantation bed.

2.5 INCIDENTAL WORKS

2.5.1 UNDOCUMENTED WORK

All plant beds are to be checked and cleaned out on a regular basis for rubbish left in planting beds.

2.5.2 SUPPLEMENTARY WORKS

Supplementary maintenance tasks are to be undertaken in conjunction, are as follows:

Waste/Rubbish management

Remove/disposal of all waste materials generated through routine landscape maintenance works.

Leaf litter control

Clear accumulated leaf litter from trees, climbers, and surrounding surfaces as required.

Surface cleaning post-herbicide application

Following the use of herbicides, all adjoining paving and hardscape areas are to be thoroughly cleaned to remove residue and prevent staining, overspray accumulation, or runoff contamination.

3.0 SOIL MANAGEMENT SCOPE

3.1 MONITORING PROGRAMME OVERVIEW

Long-term success and resilience of the planting depends on active monitoring of soil conditions, nutrient dynamics, and plant health. While site-specific soil formulation, planting strategies, and maintenance regimes have been carefully designed, data collection during the first 10 years of landscape development will be essential for guiding proactive management decisions.

The monitoring programme is to provide insight into the following:

- Soil quality and structure
- Nutrient availability and uptake
- Landscape performance and development

The monitoring programme is intended to capture periodic insights into soil quality, landscape progression, and nutrient availability and uptake. Achieving this requires a comprehensive approach involving on-site inspection by suitably qualified professionals, systematic sample collection, laboratory testing, and expert recommendations for soil improvement and remediation as needed.

3.1.1 SOIL HEALTH

In contained or isolated planting environments, inorganic material inputs will be limited. As plants absorb nutrients over time, supplementary soil additions will be required (i.e. estimated at 1-2kg of material per 100kg of existing substrate) depending on nutrient uptake and depletion rates.

Soil connectivity

Interconnected soil zones promote healthier biological activity, enhancing microbial exchange and mineral flow. Design modifications should preserve or enhance connectivity across beds, avoiding fragmentation into isolated pots or sections wherever possible.

Soil as a Living System

Soil must be treated as a living medium, akin to healthy water—requiring free movement and exchange to remain biologically active and supportive of plant development.

3.2 MULCH COVER

The service provider is responsible for all tasks necessary to support soil health through appropriate mulching practices. The service provider will be responsible for the following:

Initial Installation

A minimum mulch depth of **75mm** must be applied at planting across all garden beds.

Breakdown and Replenishment

Organic mulch will degrade over time. If mulch depth is reduced to 30mm, a top-up is required to 75mm.

- Replacement mulch must not exceed original installed levels.
- Mulch must be kept clear of plant stems/trunks to reduce the risk of disease
- Where feasible, apply fertilisers before mulching to support nutrient retention and uptake

3.3 SOIL INSPECTION AND TESTING

Landscape contractor to monitor ongoing soil performance:

- Inspections must be conducted at a minimum annually for 2 years, with one soil test scheduled for mid-spring to align with peak seasonal activity. Following the 2 years, frequency of inspection as required thereafter.
- Soil testing should be coordinated by the service provider
- **It is recommended that a qualified and accredited soil scientist** perform analytical testing, ensuring scientific accuracy and informed remediation if required

3.4 INSPECTION REQUIREMENTS

Routine inspection of soil conditions is essential to identify potential issues such as waterlogging, subsidence, as well as chemical imbalances requiring fertiliser adjustment. Soil evaluation should incorporate both physical and chemical sampling processes. Inspections to include the following:

- **Vegetation health assessment:** Conduct assessments in collaboration with service provider and record observations on:
 - o General health/structure/appearance
 - o Signs of nutrient toxicity or deficiency
 - o Evidence of pest or disease activity
 - o Plant mortality or unusual growth patterns
 - o Photographic documentation of notable plant issues and general site condition
- **Plant tissue sampling:** Collect a minimum of two (2) plant tissue samples from species showing signs of poor health, toxicity, or deficiency. If no symptoms are evident, select representative specimens at the inspector's discretion for benchmarking purposes
- **Topsoil depth survey:** Measure topsoil depth from finished garden edge levels to monitor any subsidence or erosion across the site
- **Soil Profile analysis:** Excavate soil profiles to full drainage depth at a minimum of four(4) sample points. For each location document mulch depth and determine if topping up is necessary

3.5 MEASUREMENT OF TOPSOIL DEPTH SOIL FERTILITY MANAGEMENT

The service provider must manage all aspects of soil fertility to support healthy plant growth and long-term performance of the landscape. Over time, changes in soil chemistry are expected due to nutrient uptake by vegetation, organic matter decomposition, and the activation of slow-release fertilisers.

Monitoring & assessment of soil fertility is to be evaluated through regular soil and plant nutrient testing, conducted under the guidance of a qualified horticulturist and accredited soil scientist. Testing and observations to include:

- Fertiliser specifications tailored to soil type and seasonal needs (e.g. controlled-release, fast-acting formulations)
- Recommended application rates and methods (e.g. remove mulch prior to application, incorporate correctly)
- Measurement of subsoil depth (if applicable)
- Identification of waterlogging or poor drainage
- Photographic documentation of each extracted soil profile
- Bore log recording soil structure, condition, and pedology
- From the 4 boreholes, a minimum of 1 composite sample combining topsoil and subsoil must be collected and submitted for laboratory testing to assess chemical composition and guide fertiliser strategy
- Any moisture or irrigation measurements made by maintenance teams must be made available and included within the inspection.

3.6 LABORATORY ANALYSIS

The following laboratory analysis must be conducted on the samples collected during the inspections. These sets of analysis serve as a minimum requirement. Additional testing may be required at the discretion of the inspecting consultant.

The plant tissue samples are to be analysed for total nitrogen, phosphorus, potassium, sulfur, calcium, magnesium, iron, copper, manganese, zinc, boron, sodium, chloride and nitrate.

Topsoil and subsoil samples are to be analysed for the relevant specification requirements as per *AS 4419:2018 Soils for landscaping and garden use*.

3.7 REPORTING AND DOCUMENTATION REQUIREMENTS

The inspecting consultant is required to produce a report outlining the findings of the inspections, along with the presentation of field notes, laboratory data and photographs. This Soil management report is to align with the project-wide framework in **Section 4 Reporting schedule**.

The consultant must assess the overall landscape and soil chemical/physical condition and determine if any additional actions are required to improve the quality and longevity of the landscape and planting items.

Amelioration advice is to be provided independent of any company owned products and must explain the purpose and objective of soil amendment.

Plant replacement and monitoring reports

Contractors undertaking site maintenance must report on plant health as part of routine reporting. At a minimum, the report is to note, by zone where relevant: observed pest activity, disease symptoms, weed proliferation, structural damage, plant mortality/replacements, and soil-moisture observations.

Review of monitoring reports

Completed recording sheets must be submitted to the Maintenance Coordinator and soil scientist for review and archiving. These records support the development of a landscape database and help identify recurring issues. Plants marked for replacement require photographic evidence and a brief review of site conditions to determine cause of decline. Not all losses warrant replacement, as gardens mature and natural variation occurs.

3.8 REQUIRED QUALIFICATIONS / CERTIFICATIONS

Personnel requirements

The service providers/consultant nominated to conduct soil inspections must have relevant industry experience, qualifications and be recognised as a Soil scientist and/or Horticulturalist, with demonstrated expertise in: soil profiling, sampling procedures.

Laboratory requirements

All soil and tissue samples must be analysed by a laboratory that is:

- Accredited by **NATA** (National Association of Testing Authorities)
- Recognised by **ASPAC** (Australasian Soil and Plant Analysis Council)

Report sign-off

Final soil reports, including any soil amelioration recommendations must be reviewed and formally endorsed by a qualified Soil scientist/Horticulturalist. Soil scientist/Horticulturalist to conduct soil tests annually for a minimum of 2 years, then as required thereafter.

4.0 REPORTING SCHEDULE

4.1 MAINTENANCE REPORT SCHEDULE

4.1.1 MONTHLY / QUARTERLY REPORTS

Timing of reporting

Reports to be submitted by the last Friday of each month for the first 6 months following commencement of maintenance activities. Thereafter, reporting frequency will shift to a quarterly basis.

Each report to include the following:

- A summary of the general status of works undertaken during the reporting period
- Soil test results relevant to the fertiliser programme and overall soil condition
- Details of plant replacements, including identification, location, and reasons for replacement
- An overview of maintenance activities, highlighting key operational tasks carried out in the period

Incident reports

Any disturbance or incident that impacts the daily scheduling or delivery of landscape maintenance works must be reported. Notification to be made verbally to the service provider or relevant site authority, and to be confirmed in recorded writing/correspondence.

Minimum report content requirements: Check list as listed below.

Item	Action
Plant material	Replace failed plants
	Additional planting
	Treat for disease or insect attack
	Tree surgery
	Fertilising generally
	Fertilising for specific nutrient deficiencies
	Thin out planting
Soil	Pruning/trimming
	Additional soil
	Soil conditioner
Mulch	Weeding
	Top up mulch
Rubbish removal	Generally remove bottles, paper, cigarette butts etc.
	Remove leaf, litter from pots and other permanent planting areas
Irrigation	Replace parts
	Repair
	Clean out
	Adjust
	Clean out subsurface drains

5.0 MAINTENANCE PROCEDURE SCHEDULE

5.1 MAINTENANCE SCOPE OF WORKS AND SCHEDULE

Minimum attendance checklist

Initial 6 months require monthly reporting, there after quarterly reports are required only.

Table	ACTIVITY	FREQUENCY						ACTION
		D	W	2W	3W	M	3/6/12 M	
1	Logbook	+		+		+		Complete a logbook entry every day at site and at least every two weeks. All actions listed below require a logbook entry. Upon request, make the logbook available for inspection. Submit copies of new entries in the logbook to the Contract Administrator on a monthly basis. Please note that more frequent, short, occasional inspection should result in less maintenance work when problems are observed earlier than they might otherwise have been seen.
2	Plant replacement			+		+		Inspect and replace failed plants within 2 weeks of observation of failure. Match species, size (original) and location of new with old. If a replaced plant persists to fail due to environmental conditions replace with a more suitable species within the selected planting palette provided by the landscape architect.
3	Mulch			+		+		Inspect and replace mulch deficiencies within 2 weeks of observation. Ensure gardens beds have evenly dispersed mulch as high winds may have impact. Prior to placing new mulch aerate the soil by fork turning to a depth of at least 100mm, roughly level the soil and then place mulch. Do not disturb major plant roots while aerating soil.

4	Soil control					+	12	Check moisture levels of soil monthly in all planter beds to ensure water dispersal is in accordance with the irrigation system. Furthermore, sample and test soil annually checking to ensure there isn't any persisting contaminants and/or toxicities and adjust accordingly.
5	Stakes and ties			+				Inspect every two weeks, adjust and/or replace as necessary but remove as plants mature and are able to support themselves usually within 3 months.
6	Weed and rubbish removal	+		+				Rubbish Removal to as required, weed removal every 2 weeks. Inspect and remove immediately upon observation. Leave no waste on site. Dispose of waste material at a designated waste disposal site.
7	Pruning			+				Inspect every 2 weeks and prune as necessary to remove dead wood, improve plant shape and promote healthy vigorous new growth. Specifically Monitor Level 03 rooftop trees and their canopies not to exceed parapet.
8	Spraying			+				Inspect every 2 weeks and action as necessary. Do not spray if other non-chemical methods will satisfy the need to remove insects. Spray for disease control only when necessary.
9	Drainage		+					Inspect strip drains and pits along with planter drainage to ensure there are no blockages; clear immediately if any loose rubbish or fill is blocking drains.
10	Planting and fertilising			+			3m+	Inspect every 2 weeks and remove spent flowers and dead stalks as they become apparent. Fertilise gardens every 3 months or other frequency in accordance with fertiliser manufacturer's directions.

11	Irrigation			+				Ensure the irrigation system is working as intended and as per manufacture specification for all planters. Ensure that Tree Ferns canopy dripper is adjusted to match the length of growth. General measures for watering include but are not limited to; do not allow soil and plants to dehydrate. Allow for prolonged rain, windy and dry periods. Water in the early morning or late afternoon to avoid excessive evaporation during the heat of the day.
12	Fixed Furniture						6-12m+	Inspect surface of all fixed furniture ensuring all fixings and surfaces are to standard as per manufactures specification. Clean surfaces every 12months or as needed.

6.0 IRRIGATION MAINTENANCE SCOPE

6.1 IRRIGATION MAINTENANCE SCOPE OF WORKS

The service provider must perform all aspects of irrigation monitoring and performance checks. Only staff trained in effective irrigation shall undertake the irrigation assessment. Water shall be applied at a rate that allows even infiltration into the soil without disturbing mulch or mixing soil with mulch. Overly high-water pressures or too high flow rates can disturb mulch and create a soil / mulch blend at the surface. If soil is blended with mulch, it will detract from the specified mulch depth requiring additional mulch to be added. This may have implications for weed control and / or nitrogen drawdown and maintenance of adequate fertility. Do not over irrigate/water as reduced oxygen levels will lead to an anaerobic environment and the death and decline of plants. Water must be applied at a rate that does not exceed the infiltration rate of the soil.

Equipment maintenance:

- Check all components for proper operation.
- Repair or replace damaged component with equivalent parts.
- Flush any dirt or foreign matter from the system and clear all blockages.
- Operation: Ensure by adjustment or replacement of components, that the overall operation of the system is efficient and operational.

Supervision: Prevent excessive use of water.

6.2 PROGRAMMING

- Automated systems programmed to align with periods of optimal water pressure and absorption—typically during early mornings or cooler parts of the day. Programming should aim to minimise water usage while ensuring effective coverage
- Watering cycles to consider/avoid interference with site access and functionality, including pedestrian pathways, seating zones, and vehicular traffic flows

Minimum attendance checklist

General	
Filters – mainline	Monthly
Electrical source output (auto system)	Monthly
Controller (automatic systems)	Monthly
Operation – progression - Sta to Sta.	Fortnightly
Proper activation of valves	Monthly
Proper timing of stations	Every 2 years
Proper time and day readings	Fortnightly
Valve operation	Every 2 years
Open, close completely (weeping)	Fortnightly
Riser seal leaks	Every 2 months
Set to grade	Every 2 months
Coverage pressure	Every 2 months
Clogged screens	Every 2 months
Piping	Every 2 months
Leaks – broken or cracked pipe	As Needed
Bad solvent welds, bad threaded	As Needed
Connection	As Needed
Clogged pipe	As Needed

7.0 WASTE MANAGEMENT

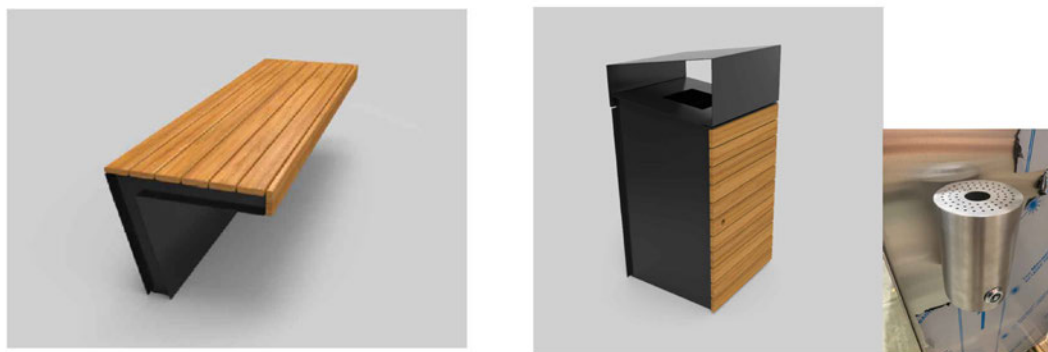
A Waste Management Plan (WMP) has been prepared, in accordance with the NSW Waste Classification Guidelines (2014) and the Blacktown Development Control Plan (2015). Wastes generated from the site will be managed in accordance with the WMP.

8.0 FIXED FURNITURE

Inspect surface of all fixed furniture ensuring all fixings and surfaces are to standard as per manufactures specification. Clean surfaces every 6-12 months or as needed.

Timber Maintenance

Inspect surface of all timber to ensure there is no splintering or damages, replace as per manufactures specification. Re-apply specified timber finishes to manufacturers specification.



F1-Bench Seat, F2-Rubbish bin. Refer to Landscape Material and Plant Schedule (A-8111 - Materials and Plant Schedule)

APPENDIX 01 – LANDSCAPE MATERIALS SCHEDULE

22-869 - MATERIALS SCHEDULE					
CODE	TYPE	LOCATION	PRODUCT INFORMATION	MATERIAL	CONSTRUCTION NOTES
PAVING & SURFACES					
P1	In situ concrete with exposed aggregate	Communal area	Grey concrete to Engineers Detail. Aggregate: TBC	Grey Concrete	Refer Landscape Detail and Specification
LANDSCAPE FENCES					
FE1	Palisade Fence	To boundary edge	Pre-fab Palisade Fence Fence material: Powdercoated Steel Colour: Charcoal Height: 1800mm TBC	Powdercoated Steel	Refer Architectural Drawingd
FURNITURE + ELEMENTS					
F1	Seating Bench	Communal area	Product: Ocley Bench Size: 1800mm length Beams: Timber Supports: Powdercoated charcoal	Hardwood Timber + Steel Supports	Refer Landscape Specification
F2	Rubbish Bin	Communal area	Product: Ocley Bench Size: 1240mm x 600mm x 605mm Beams: Timber Supports: Powdercoated charcoal	Hardwood Timber + Steel Supports	Refer Landscape Specification
F3	Planter Box	Communal area	Product: Lander Metals Planter Box Size: 1200mm x 1200mm x 560mm Material: Galvanised Steel Supports: As per Lander Steel Specification	Galvanised Steel	Refer Lander Metals Specification 02 4209 3039

APPENDIX 02 – LANDSCAPE PLANTING SCHEDULE

22-869 - PLANT SCHEDULE					
CODE	BOTANIC NAME	COMMON NAME	MATURE SIZE (h x w) (m)	PROPOSED POT SIZE	QUANTITY
TREES & PALMS					TOTAL: 75
Ba	<i>Brachychiton acerifolius</i>	Flame Tree	3 x 2	200L	9
Qm	<i>Corymbia maculata</i>	Spotted Gum	20 x 10	400L	24
Lc	<i>Lophostemon confertus</i>	Brush Box	15 x 10	200L	23
Ti	<i>Tristania lusciosa</i>	Luscious Water Gum	10 x 5	200L	19
SHRUBS & ACCENTS					TOTAL: 413
Be	<i>Banksia ericifolia</i>	Heath Banksia	4 x 3	300mm	106
As	<i>Acacia stricta</i>	Hop Wattle	3 x 2	300mm	56
Apa	<i>Acacia parramattensis</i>	Parramatta Green Wattle	6 x 3	300mm	22
Grg	<i>Grevillea 'Robyn Gordon'</i>	Robyn Gordon Grevillea	3 x 2	300mm	97
Gr	<i>Grevillea rosmarinifolia</i>	Rosemary Grevillea	2 x 2	300mm	132
GRASS + SHRUB MATRIX 1				TOTAL AREA: 3542 m2	
Bi	<i>Banksia spinulosa 'Birthday Candles'</i>	Banksia Birthday Candles	0.4 x 1	150mm	1288
Gm	<i>Grevillea 'Poorinda Royal Mantle'</i>	Royal Mantle	0.3 x 4	150mm	1717
Lt	<i>Lomandra 'Tanika'</i>	Mat Rush	1 x 1	150mm	2862
Mp	<i>Myoporum parvifolium</i>	Creeping Boobialla	0.15 x spreading	150mm	2290
Pl	<i>Poa labillardieri 'Eskdale'</i>	Tussock Grass	0.5 x 0.5	150mm	4293
Wm	<i>Westringia fruticosa 'Mundi'</i>	Native Rosemary	0.4 x 1.5	150mm	1717
GRASS + SHRUB MATRIX 2				TOTAL AREA: 281 m2	
Gbr	<i>Grevillea 'Bronze Rambler'</i>	Grevillea	0.25 x 1	150mm	262
Wm	<i>Westringia fruticosa 'Mundi'</i>	Native Rosemary	0.4 x 1.5	150mm	262
Mp	<i>Myoporum parvifolium</i>	Creeping Boobialla	0.15 x spreading	150mm	262
PLANTER BOX MATRIX				TOTAL AREA: 92 m2	
Be	<i>Banksia ericifolia</i>	Heath Banksia	4 x 3	300mm	92
As	<i>Acacia stricta</i>	Hop Wattle	3 x 2	300mm	92
Wm	<i>Westringia fruticosa 'Mundi'</i>	Native Rosemary	0.4 x 1.5	150mm	92
Gm	<i>Grevillea 'Poorinda Royal Mantle'</i>	Royal Mantle	0.3 x 4	150mm	92
Bi	<i>Banksia spinulosa 'Birthday Candles'</i>	Banksia Birthday Candles	0.4 x 1	150mm	92

Note: Final species selection may differ from the indicative plant schedule, pending incorporation of planting species suggestions by Traditional Custodians and Aboriginal stakeholders

1. *Mulch specification:

Supplier: ANL

Product: Forest blend/or equivalent

From: [Simon Humphreys](#)
To: mail@camden.nsw.gov.au
Cc: [Jacob Morris](#)
Subject: Project Echidna Data Centre Eastern Creek - Landscape Management Plan
Date: Monday, 13 October 2025 7:10:00 PM
Attachments: [22-869 Eastern Creek DC Landscape Management Plan.pdf](#)

Dear Camden Council,

Please find attached Landscape Management Plan for Project Echidna Data Centre Eastern Creek.

The landscape management plan describes the ongoing monitoring and maintenance measures to manage the landscape across the site. This plan builds on and aligns with the SSDA deliverables (Landscape Report and Drawings), which included a Landscape Maintenance/Management section responding to the EIS/SSDA requirements.

The Landscape management plan requires consultation with Council so please let us know any comments.

Kind regards

Simon Humphreys

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