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Information provided for the purposes of section 60F of the *Land Use Planning and Approvals Act 1993*

Wesley Vale Advanced Computing Infrastructure

Prepared for

Firmus Technologies Pty Ltd

Client representative

Ben Swift

Date

3 November 2026

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Prepared by — Katrina Hill RPIA		**Date — 30 October 2026**
Reviewed by — Colin Davis		**Date — 30 October 2026**
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Executive Summary

pitt&sherry provides the following information on behalf of Firmus Technologies Pty Ltd (the Proponent) for the purposes of section 60F of the *Land Use Planning and Approvals Act 1993* (LUPAA). This Proposal is provided in response to the Minister's notice under section 60E(2) of LUPAA, in accordance with section 60E(3).

The Wesley Vale Advanced Computing Infrastructure Project (the Project) is the subject of a development application currently being assessed by Latrobe Council under LUPAA and the *Tasmanian Planning Scheme – Latrobe*. The application is supported by specialist technical investigations. It has been subject to requests for further information and has proceeded through public exhibition.

The Project is a substantial private industrial development. However, the planning and environmental matters arising from it are identifiable, localised and capable of assessment through established planning, environmental and technical disciplines. These matters include land use, building siting and form, traffic and access, parking and loading, stormwater, operational noise, cooling infrastructure, standby generation, fuel storage, bushfire risk, lighting, servicing and interactions with surrounding land and infrastructure.

For the reasons set out in Section 12, the Proponent does not consider that the Project has any of the attributes in section 60M(1) of LUPAA. Accordingly, the Proponent does not consider the Project eligible to be declared a Major Project.

The information below is provided to address the requirements of section 60F. Its provision should not be read as an acceptance that the Project is eligible for declaration as a Major Project. Nor should it be read as suggesting that the development application cannot be assessed and determined by Latrobe Council under the existing statutory framework.

1. Proponent

Pursuant to section 60F(1)(a) of LUPAA, a Major Project proposal must include the name and contact details of the project proponent. We provide those details below.

The proponent is Firmus Technologies Pty Ltd (Firmus or the Proponent).

Registered Office	FIRMUS TECHNOLOGIES PTY LTD Level 14, 333 George Street Sydney, NSW 2000 Australia
ABN	28 655 498 105
Nominated Contact Person	Ben Swift 23 Killafaddy Rd, St Leonards TAS 7250 ben.swift@firmus.co

2. Proponent experience and financial capacity

Pursuant to section 60F(1)(b) of LUPAA, a Major Project proposal must include details of the proponent's experience and of the proponent's financial capacity to implement the project. Those details are provided below.

Firmus is an Australian technology and infrastructure company established in Launceston. Firmus commenced building and testing advanced computing infrastructure in Launceston in 2020. The company has software, hardware, engineering, construction, operations and research and development capability.

Firmus has experience in the development and operation of advanced computing infrastructure. The company has developed and operated a high-technology test facility in Launceston and has used that work in the development of its AI Factory design.

The Wesley Vale project team includes specialist capability across computing infrastructure, electrical systems, engineering, construction, operations, energy, planning, traffic, acoustics, water, wastewater, bushfire risk and emergency management.

Firmus is currently delivering a comparable advanced computing facility at St Leonards, Launceston. That project is similar to the proposal in project value, construction and operational workforce, utility demand and computing output. It shows that Firmus has recent, direct experience delivering a facility of this type and scale in Tasmania.

The St Leonards project has an estimated construction cost of about $250 million and is forecast to be completed in the second quarter of 2027. Firmus is the developer, owner and operator of the facility. This means it is responsible for the project from planning and construction through to long-term operation.

Firmus is delivering the St Leonards project with experienced construction partners, including Hansen Yuncken and Gradco. The proposal will draw on the same project structure, delivery relationships and local experience, which supports Firmus' capacity to deliver the project as proposed.

Details of Firmus' financial commitment to the Project are provided in Section 16 (Feasibility). The information concerning Firmus' technical and financial capacity should not be conflated. The relevant planning assessment is only concerned with the physical use and development of the land and its external effects rather than the commercial value, technical capability or sophistication of the computing equipment housed within the facility. This distinction is important because the existing planning process does not require the planning authority to assess the design or operation of processors, software or proprietary computing systems.

3. Project name

Pursuant to section 60F(1)(c) of LUPAA, a Major Project proposal must include the name of the project.

The name of the project is the Wesley Vale Advanced Computing Infrastructure Project (the **Project**).

A development application for the Project has been lodged with Latrobe Council and is currently under assessment. The information and supporting material contained in this Proposal is derived from the development application before Council.

4. Project description

Pursuant to section 60F(1)(d) of LUPAA, a Major Project proposal must include a description of the project, including:

(a) the activities that are proposed to be carried out as part of the project after the construction phase of the project is completed; and

(b) the proposed uses or developments that are proposed to occur in relation to the project.

Those details are provided below.

4.1 Use and Development

The Project comprises the construction and operation of utility-scale advanced computing and data-processing infrastructure at 226 Mill Road, Wesley Vale (Certificate of Title 187534/1) (the Site).

A copy of the Title for the Site is annexed as “Annexure A”.

Unlike conventional industrial uses that manufacture or process physical goods, the Project performs large-scale data processing, storage and computational functions, enabling cloud services, high-performance computing, digital platforms and networked systems relied upon by businesses, institutions and the broader community.

The Project is proposed to be located within the established Mill Park industrial precinct and will provide large-scale computing, data processing, storage and transmission capacity. It is intended to operate continuously, with controlled access and supporting electrical, cooling, water, fire-protection and communications infrastructure.

The Project comprises:

- a principal data hall building containing technical and administration areas
- backup power infrastructure, including multiple standby generators and associated battery infrastructure located adjacent to the main building
- cooling infrastructure, including roof-mounted chillers and ground-level adiabatic cooling infrastructure
- water storage and treatment infrastructure, including multiple process water tanks (approximately 1,000 kL of rainwater storage), potable water storage, treatment, pumping and process-water distribution infrastructure
- fire protection infrastructure including a dedicated fire water storage, pumps, hydrants, sprinklers and booster infrastructure
- on-site wastewater management infrastructure, including an aerated wastewater treatment system (AWTS) and associated subsurface irrigation disposal area
- internal access roads, circulation areas, loading and servicing zones, and hardstand areas to support operational access and periodic heavy vehicle movements

- parking areas consisting of 27 car parking spaces (comprising 23 standard spaces, 2 electric vehicle (EV) spaces and 2 accessible spaces) and 16 bicycle spaces
- a guardhouse, and secured entry arrangement, including vehicle traps, gates and perimeter fencing to control and manage site access
- stormwater infrastructure; and
- electrical kiosks, substations and associated electricity connection infrastructure.

Figure 1 below shows the Site Plan for the Project.

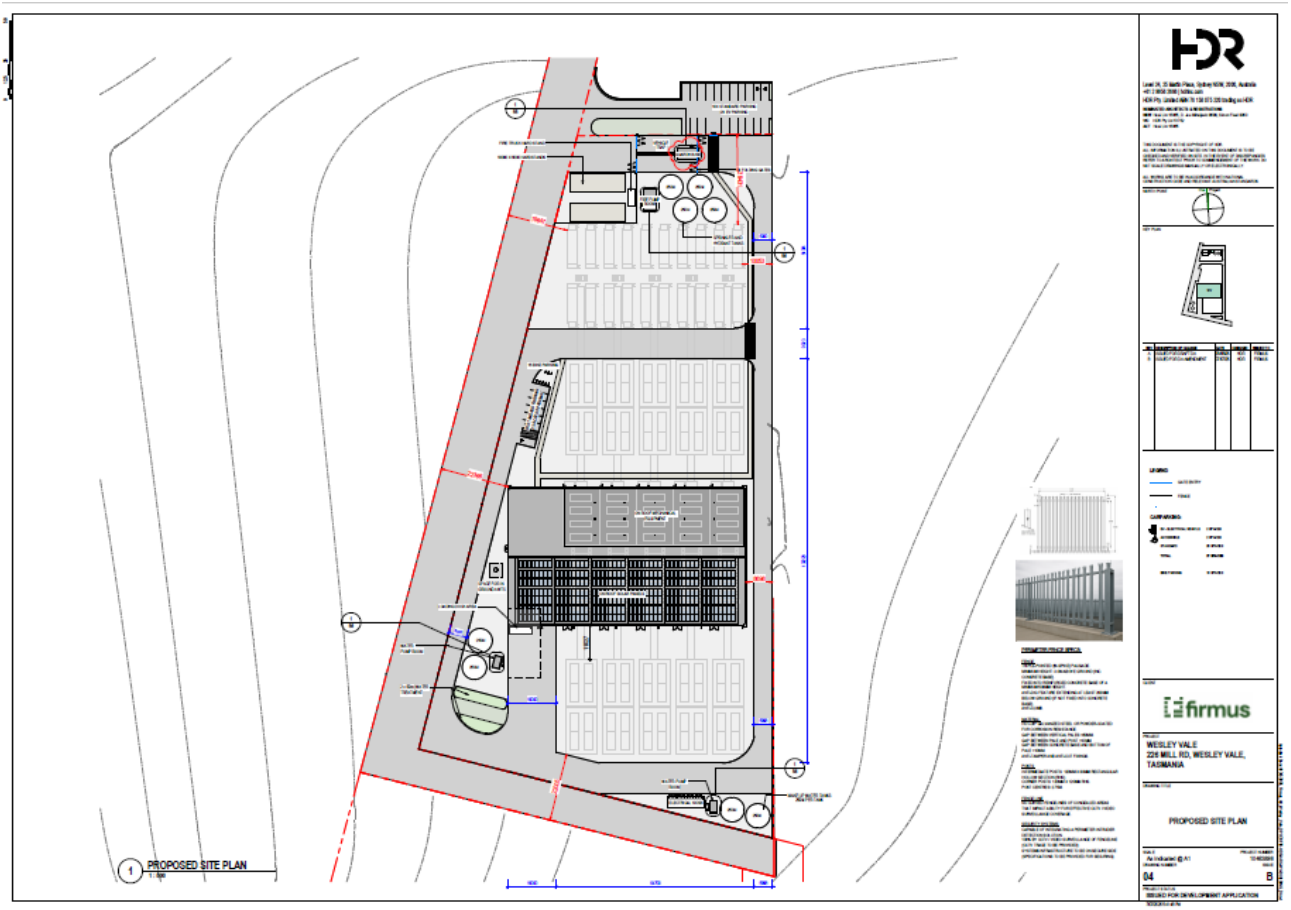


Figure 1: Site Plan of the Project

The Project will occupy a total gross floor area of approximately **3,502 m²**, comprising a 20 m² guardhouse, 793 m² of administrative floor space and 2,689 m² of technical area.

The primary building has a roof height of approximately 8.5 m above ground level. Roof-mounted plant and screening (including the louvred chiller screen) increase the overall maximum height on the Site to approximately 15.1 m.

Other infrastructure elements, including generators, pump rooms, and ancillary structures, are generally located at or below the main building roof height and remain subordinate in scale to the primary building and rooftop plant.

A copy of the drawings forms part of the Planning Application for the Project and is annexed as “Annexure C”.

4.2 Operational activities

The Project is intended to operate on a continuous 24-hour, 7-day basis, consistent with the operational requirements of critical infrastructure.

Operational activities will principally comprise:

- operation and monitoring of computing infrastructure
- operation and maintenance of electrical and cooling systems
- water and fire-protection system operation
- security and access control
- inspection, maintenance and replacement of plant and equipment
- administration and facilities management
- periodic operation and testing of standby power equipment; and
- servicing, deliveries and waste collection.

The Site would employ approximately 25 permanent full-time staff in total. Staffing levels on Site would vary from day to day depending on operational requirements and roster arrangements. A typical weekday may include approximately 10 staff during the day shift (8:00 am–5:00 pm), with approximately four staff rostered across the two evening and night shifts operating between 4:00 pm and 8:00 am. These figures are indicative only, and the number and distribution of staff on Site may vary on particular days. The identified shift-based staffing represents expected persons present at the facility during normal operations and is distinct from the overall number of permanent positions supported by the project.

4.3 Construction

Construction will comprise site preparation and earthworks, building platforms, internal roads and hardstand, building construction, installation of mechanical and electrical plant, water and wastewater infrastructure, firefighting systems, security works, landscaping, commissioning and testing.

5. Location and project land

Pursuant to section 60F(1)(e) of LUPAA, a Major Project proposal must include a map or description of the location of the proposed land on which the project is to be situated. We provide those details below.

The project is located at 226 Mill Road, Wesley Vale (comprised in Certificate of Title 187534/1), within the Mill Park industrial precinct in the Latrobe municipal area. Figure 2 below shows the locality of the Site. The principal development footprint is proposed to be located on the land on certificate of title 187534/1.

The adjoining land at 226 Mill Road, Wesley Vale (certificate of title 187534/3) (the Adjoining Land) is relevant to associated land arrangements, including the bushfire hazard management requirements identified in the supporting bushfire assessment.

The Site is located beside the Wesley Vale electricity substation and existing electricity transmission infrastructure. The Site forms part of an established industrial landholding that has been previously modified to accommodate large-scale industrial and infrastructure-based development. While the broader site historically accommodated industrial warehousing associated with the Wesley Vale Pulp Mill, the particular portion of land the subject of the Project remains undeveloped.

The Site is zoned General Industrial, reflecting its intended role in supporting industrial activity and infrastructure uses that require separation from sensitive land uses. The surrounding area includes General Industrial, Utilities and Agriculture zoned land (see Figure 3 below)



Figure 2: Locality of the Site (subject site outlined in red)

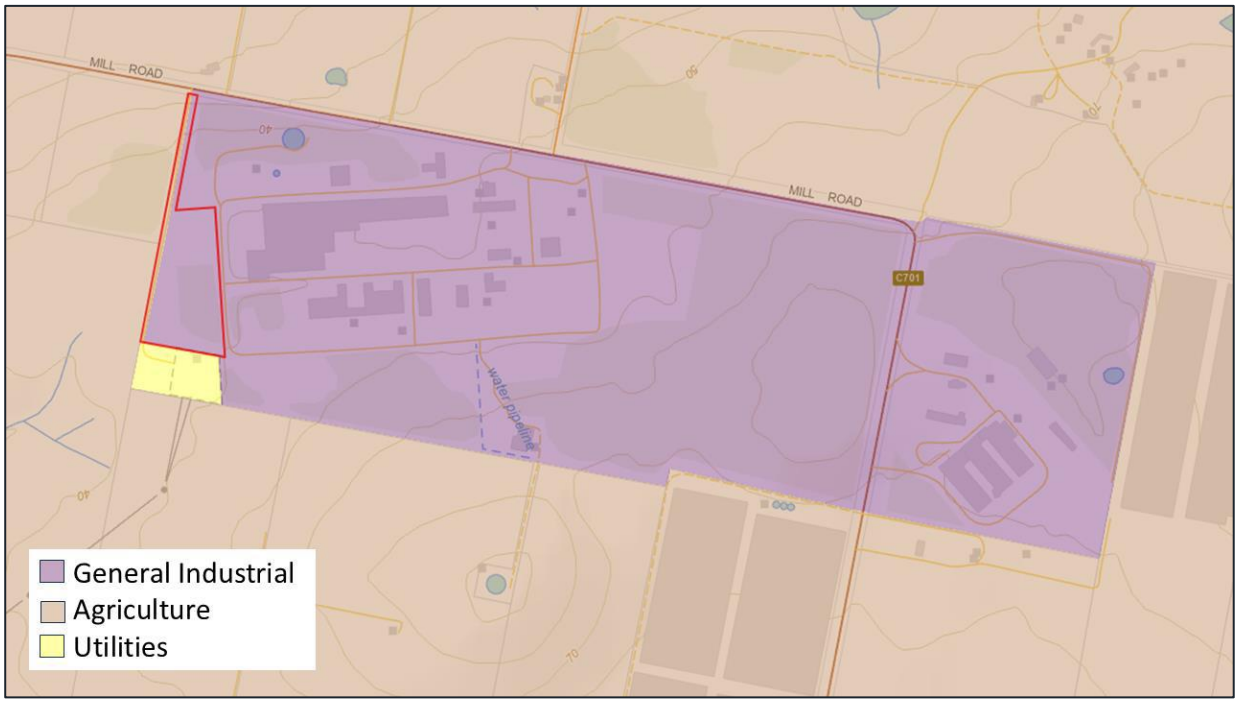


Figure 3: Zoning of Site and surrounding area

The location is significant to the project because it enables the development to utilise an established industrial precinct and existing strategic infrastructure rather than requiring establishment of an entirely new infrastructure corridor or industrial precinct. This distinguishes the Project, as a large industrial customer of existing infrastructure, from a project that requires the State to establish substantial new strategic infrastructure.

6. Physical features of the project land and surrounding area

Pursuant to section 60F(1)(f) of LUPAA, a Major Project proposal must include a general description of the physical features of the land on which the project is to be situated and of land in the vicinity that may be affected by the project. We provide those details below.

The development footprint occupies an undeveloped portion of the former Wesley Vale Pulp Mill landholding, within a rural-industrial landscape that has been substantially modified by past industrial activity.

The development area is gently sloping. The broader landform falls from south to north, with modified and partly levelled industrial land to the east and gently undulating agricultural land surrounding the industrial precinct.

Vegetation within and around the development area comprises modified ground cover, agricultural land, pine plantation, shelterbelts and patches of woody vegetation. For bushfire purposes, the Bushfire Hazard Management Plan classifies the plantation as Forest, the agricultural land as Grassland and developed or hardstand areas as low-threat vegetation.

The land surrounding the Site is predominantly industrial land, electricity infrastructure, including the adjoining Wesley Vale substation, and agricultural land. The nearby land that may be affected by the Project comprises the Adjoining Land, where bushfire hazard management measures apply, and dispersed dwellings outside the industrial precinct, which have been considered in the operational noise assessment.

7. Anticipated effects on surrounding land

Pursuant to section 60F(1)(g) of LUPAA, a Major Project proposal must cover the anticipated effect of the project on the land in the vicinity of the project. We provide those details below.

The potential effects of the Project on surrounding land are well defined and have been specifically considered through the existing development application and supporting technical investigations.

The Project is located within an established industrial precinct that includes industrial, utility and infrastructure uses, including the adjoining Wesley Vale substation, with agricultural land surrounding the broader precinct. The Site benefits from separation from more sensitive land uses and established industrial access and infrastructure. The planning assessment concludes that the Project is compatible with this surrounding land-use context and can be accommodated without unreasonable impacts on surrounding land, infrastructure or environmental values.

The potential off-site effects principally relate to operational noise, traffic and access, lighting, bushfire and hazardous materials, water and wastewater, stormwater, earthworks and vegetation clearance, visual effects, electricity infrastructure interfaces and temporary construction effects. These are established planning and environmental matters capable of assessment under the ordinary development application process. They have already been investigated to a substantial degree through the development application process.

7.1 Noise

Operational noise has been assessed with reference to the principal noise-generating components of the Project, including the roof-mounted cooling equipment, external adiabatic cooling equipment and standby generators. The assessment evaluates noise emissions under both conservative worst-case scenarios and typical operating conditions.

The modelling predicts operational noise below the adopted background plus 5 dB(A) criterion at the assessed sensitive receivers. Accordingly, the Project is not expected to result in unreasonable operational noise effects on surrounding residential or other sensitive land.

The standby generators are not proposed to operate continuously as a normal source of electricity generation. They form part of the facility's backup power infrastructure and are intended to operate during testing or power outage events. Further, verification of operational noise is recommended during detailed design when final equipment selections and manufacturer noise data are available.

7.2 Traffic and access

Traffic and access have been specifically assessed through the Traffic Impact Assessment accompanying the development application for the Project.

The assessment estimates approximately 36 vehicle movements per day associated with the Project and concludes that development-generated traffic is not expected to adversely affect the function or safety of the surrounding road network.

Access is provided from Mill Road through an established industrial access arrangement. The Site access and surrounding road environment are capable of accommodating normal staff, service and delivery vehicles associated with the facility. Routine service vehicles can enter, manoeuvre within and leave the Site in a forward direction. Arrangements are also available for the less frequent larger vehicles required for maintenance activities.

The Project therefore does not require establishment of a fundamentally new transport corridor or substantial modification of the surrounding road network. Its traffic characteristics are consistent with the existing industrial function of the locality.

7.3 Bushfire and hazardous materials

Bushfire and hazardous-material risks have been specifically considered because the Project utilises standby generators, fuel, engine oil and battery infrastructure.

The Project has been assessed as a hazardous use under the Bushfire-Prone Areas Code. A Bushfire Hazard Management Plan and Emergency Management Strategy have been prepared by suitably qualified practitioners. These documents address siting, defendable space, access, firefighting water supply, emergency procedures and the management of hazardous materials associated with operation of the Project.

The assessed bushfire attack level is BAL-12.5, subject to implementation and ongoing maintenance of the identified protection measures.

Importantly, the generator infrastructure is provided for backup power rather than continuous electricity generation. Fuel storage and associated emergency-management requirements are therefore identifiable components of the Project that can be addressed through the established planning, fire-safety, environmental and operational regulatory frameworks.

The Bushfire Hazard Management Plan and Emergency Management Strategy conclude that an appropriate level of protection can be achieved and maintained through the proposed asset-protection, access, firefighting-water and operational measures.

7.4 Water and wastewater

The Project incorporates a largely self-contained water-management system designed around rainwater harvesting, substantial on-site storage, water treatment and process-water distribution.

The water assessment identifies a 700 kL operational cooling reserve, while the current Project design provides for approximately 1,000 kL of rainwater storage capacity. The development plans show the rainwater collection, storage and process-water infrastructure integrated within the Site.

Trucked potable water provides a backup supply when required. The proposed servicing approach therefore reduces reliance on external reticulated water infrastructure while providing sufficient on-site storage for the operational requirements identified in the supporting assessment.

Wastewater associated with staff amenities is relatively limited and does not comprise an industrial process-waste stream. It is proposed to be treated through an on-site Aerated Wastewater Treatment System, with treated wastewater disposed of to a dedicated lined on-site disposal area. The current drawings identify the treatment system and a minimum 60 m² subsurface disposal area.

The supporting investigations therefore demonstrate a defined and technically assessable approach to water supply, cooling water and wastewater management rather than dependence on substantial new regional water or wastewater infrastructure.

7.5 Stormwater

Stormwater management has been integrated into the Project design rather than treated as an unresolved consequence of the development.

The development drawings include dedicated stormwater infrastructure together with a roof rainwater collection system. The roof collection system forms part of the broader project water-management strategy, enabling rainfall from the developed catchment to be captured and directed to on-site storage for subsequent use.

The stormwater effects of the Project are therefore capable of being managed through conventional civil and hydraulic design, with final geometry and specifications able to be resolved through subsequent detailed design.

7.6 Earthworks, vegetation and land disturbance

Earthworks are principally required to establish the building platform, internal roads, circulation areas, hardstand and associated infrastructure. The planning assessment identifies that these works are confined to the defined development footprint on the Site and do not involve broader regrading of surrounding agricultural land. The Project makes use of an existing modified industrial Site, limiting the extent of additional landform disturbance required.

Vegetation clearance is similarly confined to the development footprint. The existing application identifies the affected vegetation predominantly as modified ground cover on previously disturbed land and does not identify remnant native vegetation or vegetation of high ecological value within the development footprint on the information assessed.

Accordingly, the earthworks and vegetation effects are localised to the development area and are typical of the establishment of development of this nature on industrial land.

7.7 Visual effects and lighting

The visual effect of the Project must be considered in its setting. The site forms part of the established Wesley Vale industrial precinct, which contains industrial buildings, electricity transmission infrastructure, the Wesley Vale substation and other infrastructure-based uses. The proposed buildings and associated plant are consolidated within the development footprint and remain within the applicable building height provisions.

The design also incorporates measures to reduce the prominence of the development. The buildings have a predominantly low, horizontal form, with subdued external finishes and darker vertically expressed cladding. Rooftop plant is recessed and screened, reducing the visibility of service infrastructure and the apparent bulk of the buildings when viewed from surrounding land. While the Project will introduce substantial new built form and will be visible from parts of the surrounding area, it will be seen in the context of an established industrial landscape rather than as an isolated development within an undeveloped rural setting. The Project is therefore not expected to result in an unreasonable visual impact on the surrounding area.

External lighting will be required for the safe and secure operation of the site, including at building entrances, accessways, parking and servicing areas. The lighting layout will be finalised through detailed design, with lighting directed to the areas requiring illumination and fittings appropriately located, shielded or baffled to limit unnecessary light spill beyond the site.

The surrounding industrial area already contains lighting associated with industrial and utility infrastructure. Subject to detailed design, the proposed lighting can be appropriately managed to avoid unreasonable effects on surrounding properties. The final installation will be required to comply with applicable permit requirements, the relevant provisions of the Tasmanian Planning Scheme and applicable standards for external lighting and the control of light spill.

7.8 Interface with surrounding agricultural activities

An important characteristic of the Project is that it does not introduce a sensitive land use into the surrounding rural and industrial environment.

The Project does not involve residential occupation. Accordingly, normal agricultural activities on adjoining or nearby rural land are not expected to be constrained by the introduction of a new sensitive use.

The existing planning assessment considers that surrounding farming activities can continue and that the Project is not expected to create unreasonable reverse-sensitivity effects between industrial and agricultural land uses.

This is particularly relevant at Wesley Vale because the broader locality already contains a mix of agricultural, industrial and utility activities. The proposed use is compatible with that established pattern and maintains the separation of sensitive uses from higher-intensity industrial and infrastructure activity.

7.9 Electricity infrastructure

The Project is located directly adjacent to the Wesley Vale substation and existing electricity transmission infrastructure. Its relationship with that infrastructure has been expressly considered in the planning assessment, including assessment under the Electricity Transmission Infrastructure Protection Code.

The Project will be a substantial electricity customer, but that should be distinguished from the Project itself comprising new State-scale electricity infrastructure. The Project principally utilises existing strategic infrastructure at Wesley Vale, with the necessary connection and substation works associated with servicing the Site's demand.

Accordingly, electricity demand is an important servicing and infrastructure matter for the Project, but it does not of itself establish an additional unidentified land-use effect on surrounding properties.

7.10 Construction effects

Construction will necessarily result in temporary activity associated with earthworks, construction vehicles, equipment, dust and noise.

These effects are temporary and are capable of being addressed through conventional construction-management measures. The physical works are predominantly confined to the defined development footprint, with earthworks associated with building platforms, roads, hardstand and infrastructure rather than broader modification of surrounding land.

7.11 Overall effect on surrounding land

Taken together, the supporting material demonstrates that the potential effects of the Project on surrounding land are known, site-specific and capable of assessment and management.

The Project does not present an unknown environmental effect arising merely because the facility contains advanced computing equipment. The relevant external effects arise from the physical use and development of the land, including buildings, cooling plant, traffic, noise, water management, backup generation, fuel storage, bushfire risk, lighting, servicing and infrastructure interfaces. Those matters have been identified and investigated through established planning, engineering and environmental disciplines.

The supporting material, including a substantial body of site-specific technical evidence, demonstrates that the Project can be implemented without unreasonable impacts on surrounding land, infrastructure or environmental values.

8. Environmental, health, economic, social and heritage effects

Section 60F(1)(h) of LUPAA requires that the key environmental, health, economic, social and heritage effects of a project and any mitigating measures be identified in a major project proposal. Those details are provided below.

8.1 Environmental effects

The key environmental effects associated with the Project relate to operational noise, stormwater management, wastewater disposal, water demand, vegetation disturbance, hazardous materials and the temporary effects associated with construction.

These matters have informed both the design of the Project and the supporting technical investigations. Water use is managed through roof rainwater capture and substantial on-site storage, with captured water used for cooling and other

non-potable purposes. Domestic wastewater from staff facilities will be treated through an on-site aerated wastewater treatment system and disposed of to a dedicated lined disposal area. Stormwater is managed separately through the site drainage system, with roof water captured for reuse where practicable.

Other potential effects are managed through specific design and operational controls. Noise mitigation includes low-noise plant, acoustic treatment of generators, speed-controlled cooling equipment and attenuation around rooftop plant. Hazardous materials are subject to containment and separation measures, including double-bunded diesel storage, while bushfire risk is addressed through maintained hazard management areas, firefighting water supply and infrastructure, emergency access and an endorsed Emergency Management Strategy. Construction-related impacts, including dust, sediment and traffic, will be managed through appropriate construction environmental and traffic controls.

The Project is predominantly contained within a defined footprint on previously modified land within an established industrial precinct. Earthworks and vegetation removal are limited to those necessary to establish the buildings, internal access, hardstand and associated infrastructure.

The standby generators are provided for emergency backup and periodic testing rather than continuous electricity generation. Their operation is therefore intermittent and associated primarily with testing requirements and interruptions to the normal electricity supply. Potential noise effects from generator operation have been considered in the acoustic assessment, including the use of acoustic treatment to control noise at surrounding sensitive receivers.

Fuel associated with the generators will be managed as part of the facility's hazardous-material arrangements. Diesel storage is incorporated within double-bunded integral tanks, providing secondary containment in the event of a leak or equipment failure. The management of fuel, engine oil and other hazardous materials is also addressed through spill-response, fire-protection and emergency-management measures. These controls reduce the potential for generator operation and fuel storage to result in off-site environmental effects.

The environmental effects of the proposal are therefore identifiable and capable of being avoided, mitigated or managed through the project design, detailed engineering, operational controls and established regulatory requirements.

8.2 Health and safety

Potential health and safety matters principally relate to the operation and maintenance of industrial electrical and mechanical equipment, standby generators, fuel and battery infrastructure, fire and bushfire risk, cooling-water management, site access and emergency response.

These matters have informed the design of the facility and the preparation of the Bushfire Hazard Management Plan and Emergency Management Strategy. The facility incorporates maintained hazard management areas that provide separation between buildings and surrounding bushfire-prone vegetation and are designed to achieve a BAL-12.5 outcome. Dedicated firefighting infrastructure, including firefighting water storage, pumps, hydrants and booster facilities, is provided to support emergency response, together with vehicle access suitable for emergency services.

The emergency arrangements also address the management of fuel, batteries and other hazardous materials and the actions to be taken in the event of a bushfire or other emergency. Early evacuation is the primary response to a bushfire threat, with shelter within the guardhouse available as a contingency where evacuation is no longer safe. Together, these measures provide for both protection of the facility and a coordinated operational response to emergency events.

The facility does not involve residential occupation or introduce a vulnerable residential population to the Site. Operational health and safety risks are principally associated with the workforce and the operation and maintenance of the facility, including interaction with electrical and mechanical equipment, backup generators, fuel and other hazardous materials.

These risks are addressed through the design and operation of the facility, including separation and containment of hazardous materials, controlled access to operational areas, fire protection and emergency infrastructure, and established procedures for responding to incidents. The Bushfire Hazard Management Plan and Emergency Management Strategy provide additional measures for bushfire and other emergency events, including emergency

access, firefighting infrastructure and evacuation arrangements. These controls operate alongside applicable workplace health and safety, fire-safety and environmental requirements to manage risks to workers and the surrounding area.

8.3 Economic effects

The Project represents substantial private investment in advanced digital infrastructure within the established Wesley Vale industrial precinct.

The Project is expected to generate economic activity during construction through demand for civil, electrical, construction and other specialist trades and services. Information provided by the Proponent indicates that construction is expected to involve more than 70 local civil, electrical and trade contractors. Following commencement of Stage 1 operations, more than 20 permanent full-time positions are expected to be supported by the Project.

The Project will also involve privately funded electricity connection works and associated infrastructure required to service the development. This is significant in the Wesley Vale context because the Project is able to utilise an established industrial precinct and existing strategic electricity infrastructure, avoiding the need for the development of an entirely new industrial or regional infrastructure corridor.

The ongoing economic effects include permanent employment associated with operation and maintenance of the facility, demand for specialist services and contractors, and continued productive use and investment within an established industrial precinct.

The available information therefore indicates that the project will generate both construction-phase and ongoing economic activity.

8.4 Social effects

The principal positive social effects of the Project are associated with employment, investment, skilled workforce opportunities and the establishment of contemporary digital infrastructure within north-west Tasmania.

The Project also has the potential to support workforce development and diversification within an area with a long association with industrial and infrastructure-based activity. Importantly, the development occurs within an established industrial precinct rather than introducing a higher-intensity industrial use into an established residential area.

The Project has generated community interest, including concerns relating to electricity demand, water use, operational noise, standby generators, fire and bushfire risk, traffic and visual effects. These matters are acknowledged and have been addressed, or are capable of being addressed, through the project-specific technical investigations and the ordinary development application assessment.

The Proponent has also undertaken community and stakeholder engagement in addition to the statutory public exhibition process, providing additional opportunities to inform stakeholders about the Proposal and to receive community feedback, questions and input.

In considering potential social effects, it is important that any concerns are assessed against the characteristics and evidence relating specifically to the Wesley Vale Project. Broader concerns associated with data-centre development elsewhere do not necessarily reflect the impacts or outcomes of this particular Project.

The Project does not result in the displacement of residents, nor does it introduce a sensitive residential use into the surrounding agricultural and industrial environment. Existing agricultural and industrial activities in the surrounding area are expected to continue operating without being constrained by the proposed use.

8.5 Heritage

The Site is not listed on the Tasmanian Heritage Register, and the existing planning assessment has not identified any historic cultural heritage effect requiring specific mitigation as part of the proposed development.

The Project is located on land forming part of the former Wesley Vale industrial area, and the development footprint comprises previously modified land. No demolition of an identified heritage place or structure is proposed.

Aboriginal cultural heritage is regulated separately under the *Aboriginal Heritage Act 1975*. Aboriginal heritage obligations apply irrespective of whether a place has previously been recorded, and appropriate due diligence is to be maintained for works involving ground disturbance.

An Aboriginal Heritage Tasmania register search has been undertaken and an Unanticipated Discovery Plan has been prepared and will be implemented during construction so that any Aboriginal heritage encountered during construction can be appropriately managed in accordance with the applicable legislative requirements.

Accordingly, no identified historic or Aboriginal cultural heritage constraints presently prevent the proposed development. The Project will continue to implement the relevant legislative and due-diligence requirements during detailed design and construction.

9. Surveys and studies

Pursuant to section 60F(1)(i) of LUPAA, a Major Project proposal must identify the surveys and studies proposed or being undertaken in respect of the project. We provide those details below.

The project is already supported by a substantial body of specialist assessment undertaken for the development application, including:

- planning assessment
- architectural and site drawings
- Traffic Impact Assessment
- operational Noise Assessment
- water supply and water-balance assessment
- wastewater assessment
- stormwater design
- Bushfire Hazard Management Plan
- Emergency Management Strategy; and
- title and land information.

Copies of the Planning Assessment and signed application form are annexed as “Annexure C”.

A summary of the key findings and conclusions of each assessment is provided below.

Study / assessment	Scope and key findings
Planning Assessment	Assesses the Project against the *Tasmanian Planning Scheme – Latrobe*, including the General Industrial Zone and applicable codes. It identifies the relevant planning requirements and provides the statutory planning assessment for the development.

	The Planning Assessment concludes that the Project is capable of achieving compliance with all applicable provisions of the Scheme
Architectural and site drawings	Define the proposed buildings, plant, access, parking, servicing infrastructure and associated site works and provide the design basis for the supporting technical assessments.
Traffic Impact Assessment	Assesses traffic generation, site access, parking and the capacity and safety of the surrounding road network. The assessment concludes that Project traffic can be accommodated without adversely affecting the function or safety of the surrounding road network.
Operational Noise Assessment	Assesses operational noise from the principal plant and equipment, including cooling plant and standby generators, at identified sensitive receivers. It also identifies acoustic measures and the need to verify final equipment selections during detailed design. The Operational Noise Assessment confirms that the noise emissions from the Project will not exceed the background noise levels by more than 5 decibels at the nearest residences and as such, the Project will not cause a significant loss of amenity or environmental nuisance at any nearby sensitive receivers.
Water Supply and Water-Balance Assessment	Assesses water demand and the proposed supply strategy, including rainwater harvesting, on-site storage and the use of captured water for cooling. The Water Supply and Water-Balance Assessment determined that the proposed water supply, supplemented by harvested rainwater, is adequate to satisfy the Project's water requirements, including during a one-in-ten-year rainfall year.
Wastewater Assessment	Assesses wastewater generated by staff amenities and establishes the proposed on-site treatment and disposal arrangement.
Stormwater design	Establishes the proposed approach to collection and management of stormwater across the developed area, including roof-water capture and its integration with the on-site water-management system.
Bushfire Hazard Management Plan	Assesses bushfire risk and establishes the required hazard management areas, access, firefighting water supply and other bushfire-protection measures for the development.
Emergency Management Strategy	Establishes emergency-management arrangements for the facility, including bushfire response, evacuation, emergency access and the management of hazardous materials and other emergency events.
Title and land information	Identifies the land comprising the Project site and relevant title, ownership and easement information informing the planning assessment.

Since preparation of the development application material, further investigations have been undertaken in relation to the Project's proximity to Devonport Airport. These have included specialist assessment of plume rise associated with the proposed chillers, adiabatic coolers and standby generators and its potential interaction with aircraft operations.

The plume-rise assessment was subsequently provided to the Civil Aviation Safety Authority (CASA) through specialist aviation advice. CASA advised that, on the basis of the information provided, the plume from the development would not represent a hazard to aircraft operations at Devonport Airport, as the plume reduces to an acceptable vertical velocity below the height of existing buildings on the site.

A copy of the plume-rise assessment is annexed as “Annexure D”.

In October 2026, a separate electromagnetic interference assessment was completed to consider the potential interaction between the Project and radio-frequency sensitive systems at Devonport Airport. The assessment concluded that the proposed data centre equipment would not interfere with identified sensitive receivers at the Airport and that the Project would have a negligible electromagnetic interference impact on airport operations and systems, with no at-source mitigation or control measures required. The assessment has been provided to Devonport Airport and its conclusions accepted. It has also been referred to CASA for review, with a response pending at the time of preparation of this report.

A copy of the electromagnetic interference assessment is annexed as “Annexure E”.

Collectively, the development application assessments and subsequent investigations provide a substantial body of site-specific information regarding the physical development, servicing requirements, potential environmental effects and risk-management requirements of the Project.

Further detailed engineering and design work will be undertaken as the Project progresses, irrespective of the statutory assessment pathway. This will include final equipment selection and verification, detailed engineering design, and the preparation of construction-management and commissioning documentation.

10. Construction timetable

Pursuant to section 60F(1)(j) of LUPAA, a Major Project proposal must provide details of the proposed timetable for the completion of the construction phase of the project. We provide those details below.

The construction program for the Project is annexed as "Annexure B". It identifies the anticipated commencement of construction, the principal construction stages, the installation and commissioning of plant and the commencement of Stage 1 operation.

The need for further detailed design and construction programming is not indicative of an inability to assess the land use and development. Detailed engineering and construction documentation ordinarily follow planning assessment and may appropriately be dealt with through subsequent approvals and conditions where relevant.

11. Bilateral agreement project

Pursuant to section 60F(1)(k) of LUPAA, a Major Project proposal must identify whether the project is a bilateral agreement project. We provide those details below.

The Project has not presently been identified as a bilateral agreement project.

The Project has not been identified as requiring assessment under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* through the Tasmanian assessment bilateral agreement. The planning and environmental assessment presently being undertaken relates to the applicable Tasmanian statutory framework.

Accordingly, no bilateral assessment process forms part of the current assessment of the Project.

12. Capacity of the existing statutory framework

Section 60F(1)(l) of LUPAA requires the Proposal to include a statement outlining why the Minister ought to be of the opinion that the Project is eligible under section 60M to be declared a Major Project.

The Proponent does not consider the Project to be eligible for declaration as a Major Project under section 60M and, accordingly, does not contend that the Minister ought to form that opinion**.**

While this Project involves a substantial private industrial development, the scale of the investment, electricity demand

and technical sophistication of the proposed computing equipment should not be conflated with the criteria relevant to determining eligibility for assessment under the Major Project pathway.

In fact, the Project does not meet the criteria to be declared a Major Project as it:

(a) will not have a significant impact on, or make a significant contribution to, a region's economy, environment or social fabric

(b) is not of strategic importance to a region; and

(c) is not of significant scale and complexity (that warrants Major Project assessment).

Rather, the relevant planning and environmental effects associated with the Project are confined, localised and capable of and well suited to assessment through the ordinary development application process. These include building siting and form, traffic and access, parking and loading, operational noise, cooling infrastructure, stormwater, water supply and wastewater, standby generators, fuel storage, bushfire risk, lighting, servicing requirements, impacts on surrounding land and electricity infrastructure.

To date, Latrobe Council has accepted the application, identified the applicable planning provisions, reviewed the supporting technical material, sought further information, considered amended documentation and progressed the application to public exhibition.

12.1 Significant Impact on Region's Economy, Environment or Social Fabric

The Project will not have a significant impact on, or make a significant contribution to, the region's economy, environment or social fabric.

12.1.1 Economy

Although the Project represents a significant private investment in advanced digital infrastructure within the established Wesley Vale industrial precinct, that investment does not alter the fundamentally localised nature of the proposed use and development.

While the Project is expected to generate some economic activity, these benefits are relatively modest and largely confined to employment opportunities, with more than 70 local civil, electrical and trade contractors expected to be engaged during construction and up to 25 permanent full-time positions expected to be supported once the Project becomes operational.

Beyond these direct employment benefits, the Project is not expected to materially alter the economic structure of the region, create a significant new industry cluster, or drive broader regional economic transformation. As such, the economic benefits associated with the Project do not justify its assessment under the Major Project pathway.

12.1.2 Environment

Further, the Project is located within a single municipal area on land forming part of an established industrial precinct. Its relevant external effects are limited to a defined development footprint on the Site, an established industrial access network, adjoining electricity infrastructure and surrounding industrial and agricultural land.

The physical land-use and environmental effects of the Project are predominantly confined to the Site and its immediate surrounds. Relevant environmental considerations relate principally to operational noise, stormwater management, wastewater disposal, water demand, vegetation disturbance, traffic movements, bushfire risk, and the operation of standby generators. These effects are site-specific and capable of being appropriately managed through the ordinary development assessment process. The Project will not result in environmental impacts of a scale, extent or complexity that would affect the broader region or warrant assessment as a Major Project.

12.1.3 Social Fabric

Similarly, the Project will not have a significant effect on the region's social fabric.

The principal positive social effects of the Project are associated with employment, investment, skilled workforce opportunities and the establishment of contemporary digital infrastructure within north-west Tasmania.

The Project does not involve the establishment of significant social infrastructure or changes to community services and facilities. Rather, it comprises a contained industrial development within an established industrial landholding and is not expected to give rise to broader social effects.

12.2 Strategic Importance to the Region

The Project is not of strategic importance to the region.

The Proponent acknowledges that advanced computing and artificial intelligence infrastructure is an emerging sector that attracts significant national and international investment. The Australian Government has recognised data centres as critical infrastructure supporting the modern economy and has identified secure onshore data-centre infrastructure as important to Australia's artificial intelligence capability.

While the Project may sit within an emerging infrastructure sector, this does not make the Project itself strategically significant to the region for the purposes of the major project assessment framework.

The Project represents substantial private investment in advanced computing infrastructure within the established Wesley Vale industrial precinct and may contribute to Tasmania's participation in the growing digital economy. However, any strategic significance associated with the broader data-centre sector should be distinguished from the strategic significance of the Project itself.

The Project's location has specifically been selected to make use of an established industrial precinct and existing infrastructure. The Site adjoins the Wesley Vale substation and existing electricity transmission infrastructure. It is already zoned for industrial development and is capable of accommodating the proposed use. While the Project will be a substantial consumer of electricity, it does not involve the establishment of a new State-scale electricity network, regional transport corridor, bulk-water system or other comparable strategic infrastructure.

The electricity connection and associated substation works required to service the development are to be funded by the Proponent. The need for a substantial electricity connection should therefore be distinguished from a project that itself requires the State to establish new strategic infrastructure.

Accordingly, while the Project operates within a sector of growing economic interest, it does not perform a strategic regional function or create new strategic infrastructure. Consequently, the Project is not of strategic importance to the region.

12.3 Scale and complexity

The Project forms part of an emerging field of advanced computing infrastructure and incorporates technically sophisticated equipment. However, that technological sophistication does not, of itself, render the assessment of the proposed use and development unusually complex from a planning perspective.

The relevant consideration is whether the Project’s use and development, and any consequential planning effects can be appropriately addressed through the ordinary development application process. In this case, those matters are readily capable of assessment within the ordinary development application process.

The Project raises conventional planning considerations that are routinely assessed under the Scheme. These include the siting and design of buildings and infrastructure, access and traffic generation, noise, water and wastewater

management, stormwater, bushfire and hazardous materials, electricity infrastructure interfaces, lighting, servicing and construction-related effects.

While certain aspects of the Project require specialist technical investigation, this does not indicate that the Project is unusually complex or beyond the existing assessment framework under the Scheme. In fact, specialist technical investigations are a common feature of the ordinary development application process. In this instance, substantial investigations have been undertaken to enable the relevant planning considerations to be assessed against the provisions of the Scheme.

No land-use, environmental or other regulatory issue has been identified that cannot be appropriately addressed through the Scheme, together with the environmental and other legislative frameworks that operate alongside it, as part of the ordinary development application process.

The distinguishing feature of the Project is that the Project will house technically sophisticated computing equipment. The operation and performance of that equipment are not matters for planning assessment. Rather, planning assessment is concerned with the external land use and development. The technological sophistication of the equipment does not, of itself, create unusual planning issues or necessitate assessment through the Major Project pathway.

Further, the Project is a Utilities use within the General Industrial Zone. No amendment to the Latrobe Local Provisions Schedule has been identified as necessary to facilitate the proposed use and development. The Project therefore does not require the Major Project process to overcome a planning prohibition, establish an alternative planning framework or enable an amendment to the Scheme.

In determining whether a project is of significant scale and complexity, section 60M(2) of LUPAA requires the Minister to consider the number of municipal areas affected, whether two or more project-related permits are required, the technical requirements of the project and whether the activities to be carried out after construction are of interest to, or for the benefit of, a wider sector of the public than resides in the relevant municipal area. The Project is located wholly within the Latrobe municipal area and its physical effects are confined to the Site and its immediate surrounds. The Project requires a single planning permit from Latrobe Council.

The technical requirements of the Project relate to the specialist equipment housed within the facility rather than to the planning assessment of its use and development. The activities to be carried out after construction comprise the operation of a privately operated computing facility serving commercial customers. Those activities do not provide a public service to the broader region. Community interest in a development proposal is distinct from the post-construction activities being of interest to, or for the benefit of, a wider sector of the public.

The Project therefore does not present an assessment task that is beyond the existing statutory planning process. It is not of a scale or complexity that requires assessment under the Major Project framework.

12.4 Conclusion regarding eligibility

Having regard to the characteristics of the Project, the Proponent does not consider that the Project is eligible under section 60M of LUPAA to be declared a Major Project.

While the Project involves a substantial private industrial development, it:

(a) will not have a significant impact on, or make a significant contribution to, a region's economy, environment or social fabric;

(b) is not of strategic importance to a region; and

(c) is not of significant scale and complexity.

Section 60M(1) of LUPAA requires a project to have two or more of these attributes to be eligible for declaration as a Major Project. The Project has none of them.

The Project is capable of determination by Latrobe Council under the ordinary development application process. Accordingly, the Proponent does not submit that the Minister ought to form the opinion under section 60M(1) of LUPAA that the Project is eligible to be declared a Major Project.

This Proposal is provided in response to the Minister's notice under section 60E(2) of LUPAA, in accordance with section 60E(3) of LUPAA. Its provision should not be interpreted as an assertion or acceptance that the statutory eligibility threshold under section 60M is satisfied.

13. Compliance with the planning scheme

Section 60F(1)(m) of LUPAA requires the Proposal:

(a) to address whether the project complies with the requirements of the relevant planning scheme; and

(b) to identify any amendments to an LPS, if any, that would be required for the project to comply with the relevant planning scheme.

The Project has been assessed under the *Tasmanian Planning Scheme – Latrobe* (the Scheme).

The proposed use has been classified as Utilities, which is a Permitted use within the General Industrial Zone. However, as the proposed development relies on the Performance Criteria for several standards, it is subject to discretionary assessment under the Scheme.

The annexed Planning Assessment addresses the following provisions of the Scheme triggered by the Project:

- the General Industrial Zone
- Parking and Sustainable Transport Code
- Road and Railway Assets Code
- Electricity Transmission Infrastructure Protection Code
- Bushfire-Prone Areas Code
- Landslip Hazard Code; and
- Safeguarding of Airports Code.

The Planning Assessment demonstrates that the Project either complies with the Acceptable Solutions, or does not require assessment against, all applicable standards of the Scheme, with the exception of:

- C2.5.4 P1 – loading arrangements
- C2.6.5 P1 – pedestrian access
- C2.6.6 P1 – loading arrangements
- C3.5.1 P1 – traffic generation
- C4.5.3 P1 – dust or airborne particulates affecting electricity transmission infrastructure
- C4.6.2 P1 – development within the substation facility buffer
- C4.6.3 P1 – development within the communications station buffer; and
- C13.5.2 P1 – hazardous use within a bushfire-prone area.

These standards relate to loading arrangements, pedestrian access, traffic generation, protection of electricity and communications infrastructure, and the assessment of the hazardous use within bushfire-prone area.

While the Project is unable to satisfy the applicable Acceptable Solutions for these standards, the Planning Assessment

demonstrates that the relevant Performance Criteria can be satisfied. Accordingly, the Project remains capable of complying with the requirements of the Scheme without the need for any amendment to the Scheme or the Latrobe Local Provisions Schedule. As such, no amendment to the Latrobe Local Provisions Schedule is necessary to facilitate the Proposal.

This is important. The major-project pathway is not required to overcome a zoning prohibition or to facilitate an amendment to the Local Provisions Schedule. The proposed use is already contemplated within the applicable General Industrial zoning, subject to assessment of the relevant standards and codes.

Importantly, the existing Scheme does not merely provide a pathway for the Project to obtain planning approval. It provides substantive assessment criteria that directly address the matters requiring the exercise of planning discretion. The Project can therefore be tested against existing statutory requirements and determined on its planning merits without the creation of a project-specific planning control or alternative assessment framework.

14. Landowner Consent

Section 60F(1)(n) of LUPAA requires the Proposal to include information as to the consents required by section 60P(2) have been obtained.

The Site of the Project is comprised in Certificate of Title 187534/1. It is owned by the Proponent.

The Adjoining Land, which the Project relies on for bushfire hazard management requirements, is comprised in Certificate of Title 187534/3. It is owned by Tankris Pty Ltd.

A copy of both titles is annexed as “Annexure A”.

As both the Site and the Adjoining Land are privately owned, the consent of the Crown or a council under section 60P(2) of LUPAA is not required.

15. Consultation

Section 60F(1)(o) of LUPAA requires the Proposal to provide details of any consultation, with persons who may have an interest in whether the project is implemented, that has occurred or is proposed to occur. We provide those details below.

Community consultation was not required by the planning authority as a prerequisite to lodgement or assessment of the development application for the Project. Notwithstanding this, the Proponent has undertaken voluntary community and stakeholder engagement on the Project, separate from the statutory public exhibition of the development application.

The engagement activities were promoted through the following communication channels:

- Firmus Tasmanian Community Hub webpage
- social media, including Facebook
- print advertising in *The Advocate*; and
- direct stakeholder engagement and meetings.

Community engagement activities included:

- two community drop-in sessions:
  - Thursday, 30 July 2026 in Latrobe
  - Saturday, 1 August 2026 in Moriarty
- an online community webinar held on Friday, 31 July 2026; and

- an online survey, administered by Firmus, which was open from 9 July to 2 August 2026.

The engagement program was informed by matters that had attracted community and stakeholder interest during previous statutory advertising and public discussion of Firmus data centre proposals in Tasmania. These included electricity demand and network impacts, water use and supply, noise and standby generators, visual and lighting impacts, and the broader environmental and planning implications of large-scale data centre development. The engagement addressed these matters proactively and gave participants the opportunity to ask questions and provide feedback.

Firmus' published Wesley Vale project information explains the staged electricity demand and connection to the adjoining Wesley Vale substation, including network operating arrangements intended to protect existing electricity users, and the use of captured rainwater for cooling. It also covers noise and standby generator operation, external lighting, fire and bushfire safety, employment and local procurement, and the planning and environmental assessment process. Where relevant, these matters have been further considered through the Project design, operational measures and the specialist technical assessments supporting the development application. The Proponent has indicated that engagement will continue as the Project progresses.

In parallel, the development application has progressed through the statutory assessment process administered by Latrobe Council. Council has reviewed the supporting technical material, requested further information, considered amended documentation, confirmed that the outstanding information requirements had been addressed and publicly advertised the application. The statutory exhibition provided the formal opportunity for representations to be made on the application. The Proponent's engagement has supplemented, rather than replaced, that process.

Community interest in the Project, or the making of representations, does not of itself establish a need for a different assessment pathway. Representations should be considered on their planning relevance and evidentiary basis. Their number or intensity does not determine whether the Project is capable of assessment through the ordinary planning process.

16. Feasibility

Section 60F(1)(p) of LUPAA requires the Proposal to provide details of any feasibility assessment that has been undertaken, in relation to the project, by the proponent. We provide those details below.

16.1 Technical and Physical Feasibility

A significant body of technical, planning and project development work has been undertaken to evaluate the feasibility of the Project.

The Project location has been selected within an established industrial precinct at Wesley Vale, having regard to the industrial zoning of the Site, its separation from sensitive uses, established road access and its proximity to existing electricity transmission infrastructure and the Wesley Vale substation.

The Project has progressed beyond an initial site-selection concept. Detailed development drawings have been prepared together with specialist investigations addressing planning, traffic, operational noise, water supply, wastewater, stormwater, bushfire risk, emergency management and other infrastructure requirements. The technical material prepared for the Project concludes that the identified impacts can be appropriately managed through the proposed design and operational measures.

Electricity connection feasibility has also progressed as a defined project workstream. The Site directly adjoins the Wesley Vale substation and existing electricity transmission infrastructure. The Project documentation records that Firmus would purchase electricity from the grid as an industrial customer and fund the connection equipment and relevant substation works required to service the development. The community project material further records that transmission upgrades required to connect the Site, including dedicated transmission and substation equipment, are to be funded by the Proponent under its connection arrangements with TasNetworks.

The connection work has progressed into detailed design and delivery coordination. Correspondence with TasNetworks identifies two new feeder cables between the Wesley Vale substation and the proposed Firmus 22 kV switchrooms and records that TasNetworks was progressing its environmental due diligence to enable finalisation of that design.

The feasibility of the Site has also been investigated through geotechnical and structural design work. Project records show that geotechnical investigations and foundation design have been undertaken, including consideration of bearing pressures, settlement criteria, building foundations and service infrastructure. Project programming has similarly been underway during design development, with successive project schedules prepared during July and August 2026 and structural foundation design being incorporated into that delivery program.

From a transport and site-access perspective, the Project is able to utilise the established industrial access network from Mill Road rather than requiring a new connection to the public road network. The Project documentation identifies the Site as operating within an established industrial transport environment capable of accommodating industrial and service vehicle movements.

The Project has also proceeded through detailed planning assessment. The applicable planning controls and potential environmental and infrastructure effects have been investigated through the development application process. This work has established that the relevant planning issues are identifiable and capable of assessment through the Scheme.

Taken collectively, the work undertaken demonstrates that the Project has been subject to substantive site selection, planning, engineering, infrastructure and delivery investigations. The available project information supports the practical feasibility of developing and servicing the Site and identifies a defined pathway for electricity connection, access, site development and construction.

16.2 Commercial and Financial Feasibility

Firmus has already made a significant financial commitment to the Project. It has purchased the land, ordered long-lead equipment including the backup power system and cooling equipment, and engaged a head contractor. These commitments show that the Project is well advanced and that Firmus is investing in its delivery.

Firmus will also be responsible for running the facility once it is built, and it will employ up to 25 full-time staff working in shifts to provide continuous 24-hour operation. This reflects a long-term commitment to operating the facility in Wesley Vale, beyond the construction phase.

The Project has been designed to remain commercially viable over the long term. Firmus will operate the facility under long-term customer contracts, which provide a stable and predictable source of revenue. The design is future-proofed so it can house next-generation computing equipment, with provision for major equipment upgrades when needed. This means the facility can adapt to changes in technology without major redevelopment.

17. Prescribed information

Section 60F(1)(q) of LUPAA requires the Proposal to include any other information prescribed for the purposes of section 60F. No additional information has been prescribed that is relevant to the Project.

18. Overall Conclusion

The information provided above addresses the matters identified in section 60F of LUPAA to the extent presently supported by the development application for the Project, specialist studies undertaken and information available from the Proponent.

While it is acknowledged that the Project is substantial and involves significant private investment and advanced computing infrastructure, those characteristics should not be taken to mean that its planning and environmental effects are incapable of assessment through the ordinary development application framework.

The Project's relevant external effects are known and identifiable. They concern land use, buildings and works, traffic, noise, water, wastewater, stormwater, bushfire, hazardous materials, lighting, visual effects, servicing and electricity-infrastructure interfaces. Those matters are capable of being assessed and are, in fact, routinely assessed under the Scheme, together with the environmental and other legislative frameworks that operate alongside it, as part of the ordinary development application process.

The existing development application process has already demonstrated that capability. Latrobe Council has assessed the information provided, sought further information where required and progressed the Project through to public exhibition.

Accordingly, the provision of this Proposal should not be interpreted as a concession by the Proponent that the Project should be declared as a Major Project, nor that the ordinary development application pathway is inadequate.

The Proponent's position is that the Project is capable of, and suitable for, assessment and determination under the Scheme through the ordinary development application pathway.

While the Project is a substantial industrial development within an emerging infrastructure sector, its investment value and technological sophistication do not alter the nature of the planning task. The matters relevant to the use and development of the Project have been identified, substantially investigated and are capable of assessment through the ordinary development application pathway.

Important information about your report

In some circumstances the scope of services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints. The Report may only be used and relied on by the Client for the purpose set out in the Report. Any use which a third party makes of this document, or any reliance on or decisions to be made based on it, is the responsibility of the Client or such third parties.

The services undertaken by pitt&sherry in connection with preparing the Report were limited to those specifically detailed in the report and are subject to the restrictions, limitations and exclusions set out in the Report. The Report's accuracy is limited to the time period and circumstances existing at the time the Report was prepared. The opinions, conclusions and any recommendations in the Report are based on conditions encountered and information reviewed at the date of preparation of the Report. pitt&sherry has no responsibility or obligation to update the Report to account for events or changes occurring after the date that the report was prepared. If such events or changes occurred after the date that the report was prepared render the Report inaccurate, in whole or in part, pitt&sherry accepts no responsibility, and disclaims any liability whatsoever for any injury, loss or damage suffered by anyone arising from or in connection with their use of, reliance upon, or decisions or actions based on the Report, in whole or in part, for whatever purpose.

Title Information

Annexure A

pitt&sherry

'Priority final plan'

OWNER: TANKRIS PTY LTD

FOLIO REFERENCE: C.T.182276/1

GRANTEE: PART OF LOT 6230 (320 ACRES) GRANTED TO WILLIAM TAYLOR NOYES AND PART OF LOT 6016 (170 ACRES) GRANTED TO JAMES ALFRED DUNN.

PLAN OF SURVEY

NOVA LAND CONSULTING

BY SURVEYOR: COLIN STERLING SMITH

LOCATION: LAND DISTRICT OF DEVON
PARISH OF TEMPLETON

SCALE 1: 10000 LENGTHS IN METRES

Registered Number

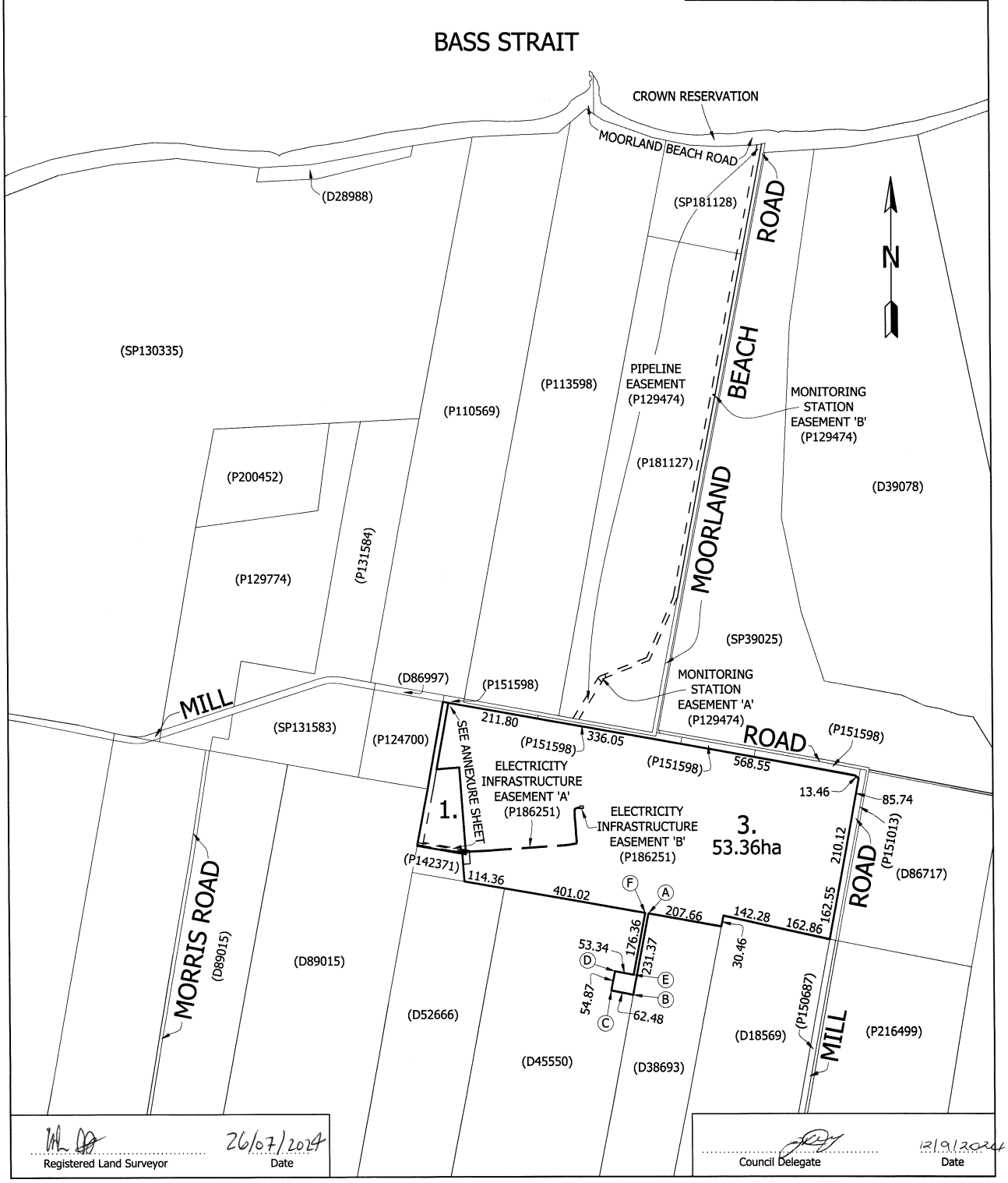
SP187534

APPROVED
EFFECTIVE FROM 28 NOV 2024

Recorder of Titles

LOT 3 IS COMPILED FROM C.T.182276/1 AND THIS SURVEY.

ALL EXISTING SURVEY NUMBERS TO BE CROSS REFERENCED ON THIS PLAN

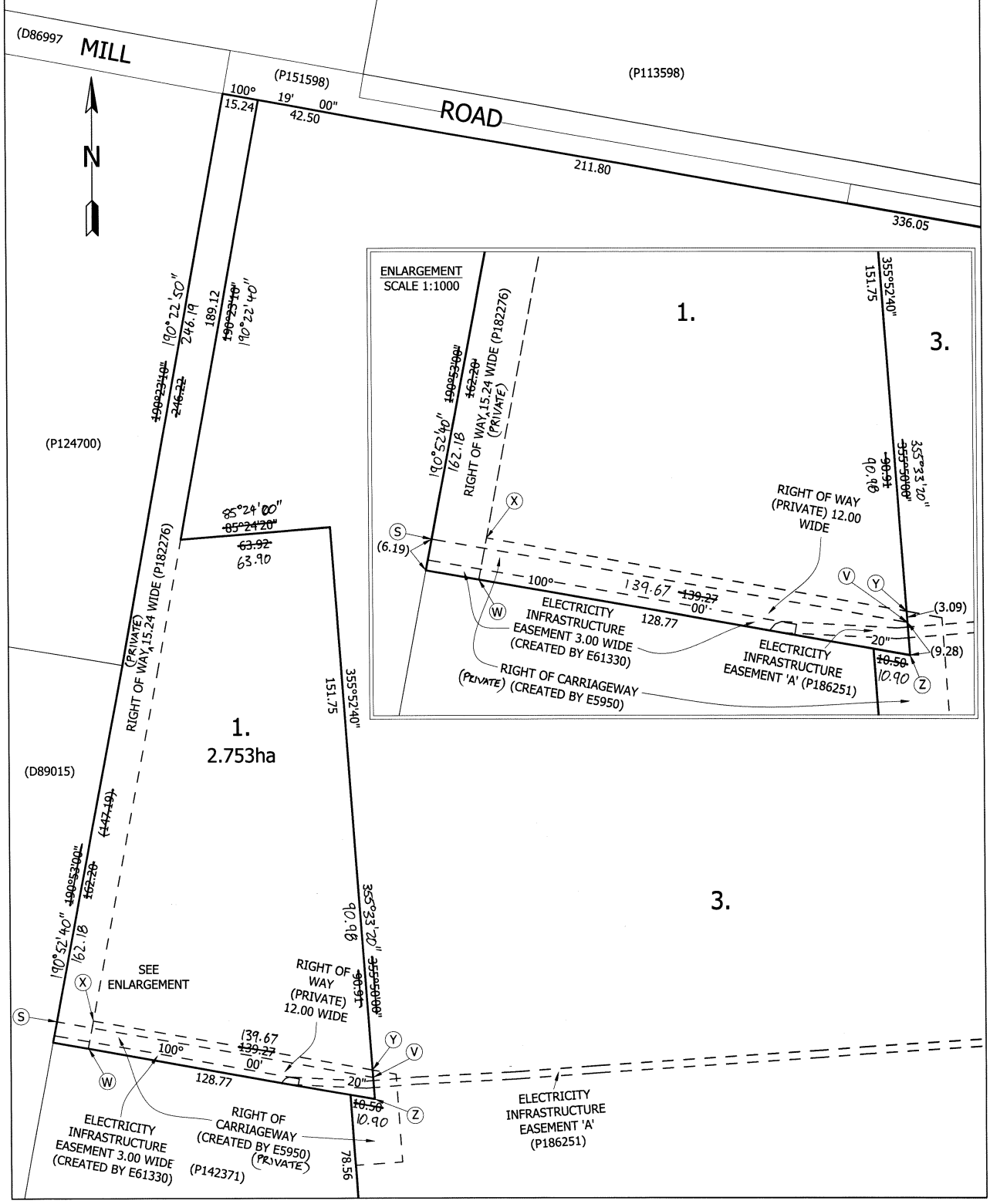


Registered Land Surveyor 26/07/2024 Date

Council Delegate 12/9/2024 Date

'Priority final Plan'

PLAN OF SURVEY ANNEXURE SHEET SHEET 1 OF 1 SHEETS NOVA LAND CONSULTING	OWNER: TANKRIS PTY LTD FOLIO REFERENCE: C.T.182276/1 SCALE 1: 1500 LENGTHS IN METRES	Registered Number SP 187534
SIGNED FOR IDENTIFICATION PURPOSES Council Delegate 26/11/24 Date	THIS ANNEXURE SHEET FORMS PART OF THE ATTACHED INDEX PLAN. Registered Land Surveyor 26/07/2024 Date	APPROVED / EFFECTIVE FROM 28 NOV 2024 Recorder of Titles



RESULT OF SEARCH

RECORDER OF TITLES

Issued Pursuant to the Land Titles Act 1980

Tasmanian Government

SEARCH OF TORRENS TITLE

VOLUME	FOLIO
187534	3
EDITION	DATE OF ISSUE
1	28-Nov-2024

SEARCH DATE : 25-May-2026
SEARCH TIME : 11.26 am

DESCRIPTION OF LAND

Parish of TEMPLETON Land District of DEVON
Lot 3 on Sealed Plan 187534
Derivation : Part of Lot 6230, 320 Acres Gtd. to William Taylor Noyes and Part of Lot 6016, 170 Acres Gtd. to James Alfred Dunn
Prior CT 182276/1

SCHEDULE 1

M751177 TRANSFER to TANKRIS PTY LTD Registered 10-Apr-2019 at noon

SCHEDULE 2

Reservations and conditions in the Crown Grant if any
SP187534 EASEMENTS in Schedule of Easements
SP187534 FENCING PROVISION in Schedule of Easements
39/8806 CONVEYANCE Made subject to fencing provision relating to the land marked A.B.C.D.E.F. on Plan 182276
D123208 LEASE to NBN CO LIMITED of a leasehold estate for the term of 10 years from 30-Apr-2023 (of that part of the said land within described shown as Lot 1 on Annexure Plan B attached to the said Lease) Registered 08-May-2014 at 12.01 pm

UNREGISTERED DEALINGS AND NOTATIONS

No unregistered dealings or other notations

SCHEDULE OF EASEMENTS	Registered Number
NOTE: THE SCHEDULE MUST BE SIGNED BY THE OWNERS & MORTGAGEES OF THE LAND AFFECTED. SIGNATURES MUST BE ATTESTED.	SP 187534

EASEMENTS AND PROFITS

Each lot on the Plan is together with:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as may be necessary to drain the stormwater and other surplus water from such lot; and
(2) any easements or profits a prendre described hereunder.
Each lot on the Plan is subject to:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as passing through such lot as may be necessary to drain the stormwater and other surplus water from any other lot on the Plan; and
(2) any easements or profits a prendre described hereunder.
The direction of the flow of water through the drainage easements shown on the Plan is indicated by arrows.

EASEMENTS

Lot 1 is subject to a Right of Carriageway (appurtenant to the land shown in deeds office diagram 89/75) over the land marked "Right of Way 15.24 Wide (P182276)".
(Private)

Lot 1 is subject to the full and unrestricted right (appurtenant as aforesaid) for The Hydro Electric Commission at all times hereafter across the land marked "Right of Way 15.24 Wide (P182276)" for towers, poles, wires and other necessary apparatus and appliances for the purpose of transmitting and distributing electrical energy.
to construct and maintain in under along and *

Lot 1 is subject to a burdening Electricity Infrastructure Easement with the benefit of a restriction as to user of land in favour Tasmanian Networks Pty Ltd on the terms prescribed in E61330 over the land marked "Electricity Infrastructure Easement 3.00 Wide (created by E61330)".
on the Plan

Each of Lots 1 and 3 are subject to a Right of Carriageway in favour of Lot 1 on plan 142371 over those parts of the "Right of Carriageway (created by E5950)" shown on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way 15.24 Wide (P182276)" shown on the plan.
(Private)

Lot 3 is together with a Right of Carriageway over the "Right of Way 15.24 (P182276)" shown passing through Lot 1 on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way (private) 12.00 Wide" marked "WXYZ"

Lot 3 is together with a Right of Carriageway over the "Right of Way (private) 12.00 Wide" marked "WXYZ" shown passing through Lot 1 on the plan.

~~Lot 1 is subject to a Right of Drainage in favour of Lot 3 over the "Drainage Easement "C" 6.00 Wide" shown on the plan.~~

(USE ANNEXURE PAGES FOR CONTINUATION)

SUBDIVIDER: Tankris Pty Ltd	PLAN SEALED BY: Latrobe Council
FOLIO REF: 182276/1	DATE: 12/9/2024
SOLICITOR & REFERENCE: Will Edwards Rae & Partners Lawyers	L-DA254/2022 REF NO.
	Council Delegate

NOTE: The Council Delegate must sign the Certificate for the purposes of identification.

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* Amelia Kate Goss 11/11/24
as solicitor for Subdivider

ANNEXURE TO SCHEDULE OF EASEMENTS PAGE 2 OF 2 PAGES	Registered Number SP 187534
SUBDIVIDER: Tankris Pty Ltd FOLIO REFERENCE: 182276/1	

Lot 3 is subject to an Electricity Infrastructure Easement in favour of Tasmanian Networks Pty Ltd on the terms specified in N168400 over the "Electricity Infrastructure Easement "B" (P186251)" shown passing through Lot 3 on the plan.

Lots 1 and 3 are each subject to an Electricity Infrastructure Easement in favour of Tasmanian Networks Pty Ltd on the terms specified in N168400 over the "Electricity Infrastructure Easement 'A' (P186215)" shown passing through lots 1 and 3 on the plan.*

FENCING PROVISION

In respect of each Lot on the Plan
The Owners, Tankris Pty Ltd shall not be required to fence.

EXECUTED by **TANKRIS PTY LTD** (ACN 009 573 899) as the registered proprietor of the property comprised in Folio of the Register Volume 182276 Folio 1 in accordance with Section 127 of the Corporations Act 2001:

.....
[Director] Anthony Wayne Seymour

.....
[Director/~~Secretary~~] Nadia Ana Seymour

Lot 3 is together with pipeline rights and other rights (more fully set forth in C81401) over the areas marked "Pipeline Easement (P129424)" and "monitoring station Easement 'A'" (subject to the conditions mentioned therein) on the plan. * & 'B'

* Amelia Kate Cox as solicitor for the Subdivider 11/11/24

NOTE: Every annexed page must be signed by the parties to the dealing or where the party is a corporate body be signed by the persons who have attested the affixing of the seal of that body to the dealing.

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'Priority final plan'

OWNER: TANKRIS PTY LTD

FOLIO REFERENCE: C.T.182276/1

GRANTEE: PART OF LOT 6230 (320 ACRES) GRANTED TO WILLIAM TAYLOR NOYES AND PART OF LOT 6016 (170 ACRES) GRANTED TO JAMES ALFRED DUNN.

PLAN OF SURVEY

NOVA LAND CONSULTING

BY SURVEYOR: COLIN STERLING SMITH

LOCATION: LAND DISTRICT OF DEVON
PARISH OF TEMPLETON

SCALE 1: 10000 LENGTHS IN METRES

Registered Number

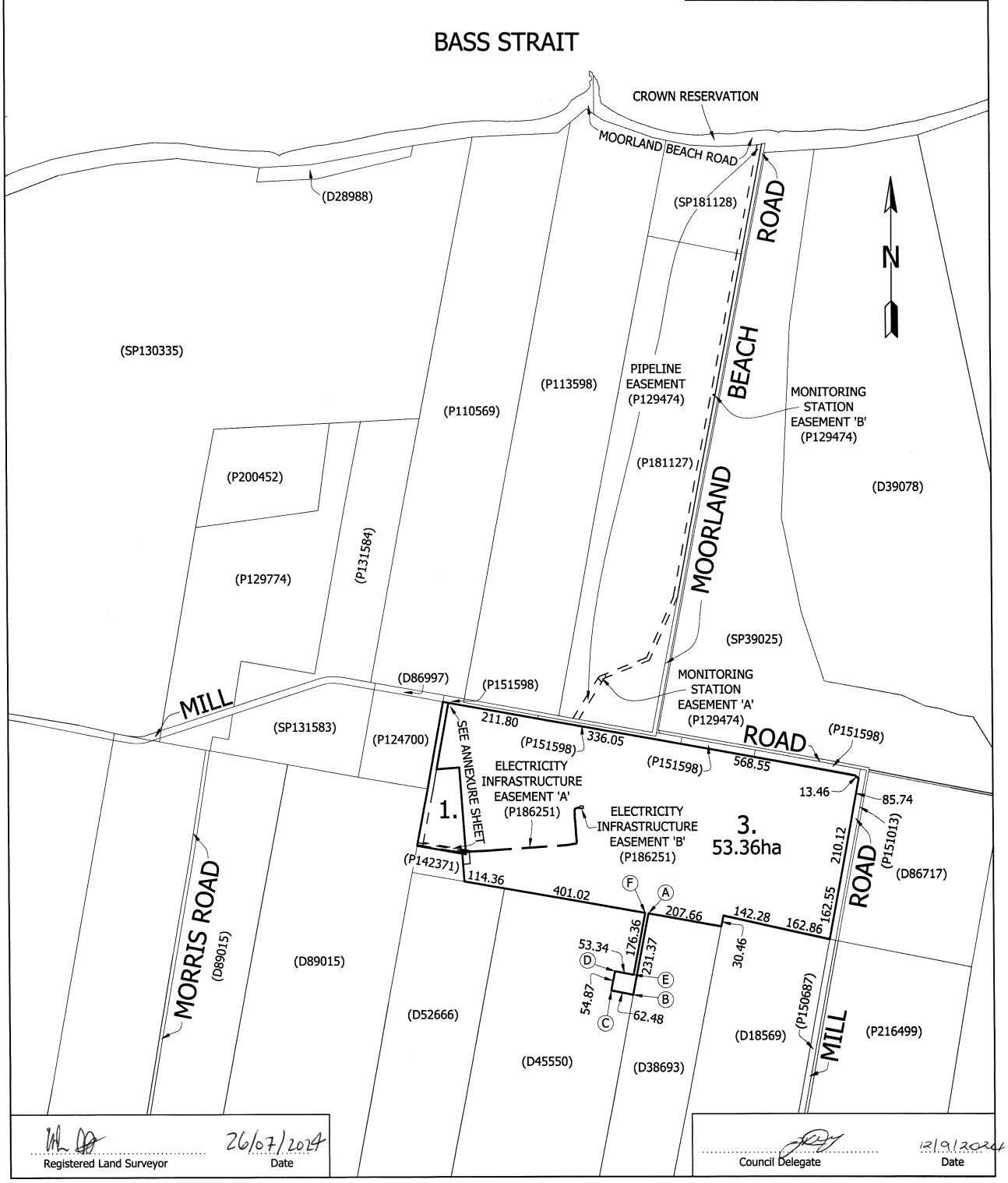
SP187534

APPROVED
EFFECTIVE FROM 28 NOV 2024

Recorder of Titles

LOT 3 IS COMPILED FROM C.T.182276/1 AND THIS SURVEY.

ALL EXISTING SURVEY NUMBERS TO BE CROSS REFERENCED ON THIS PLAN

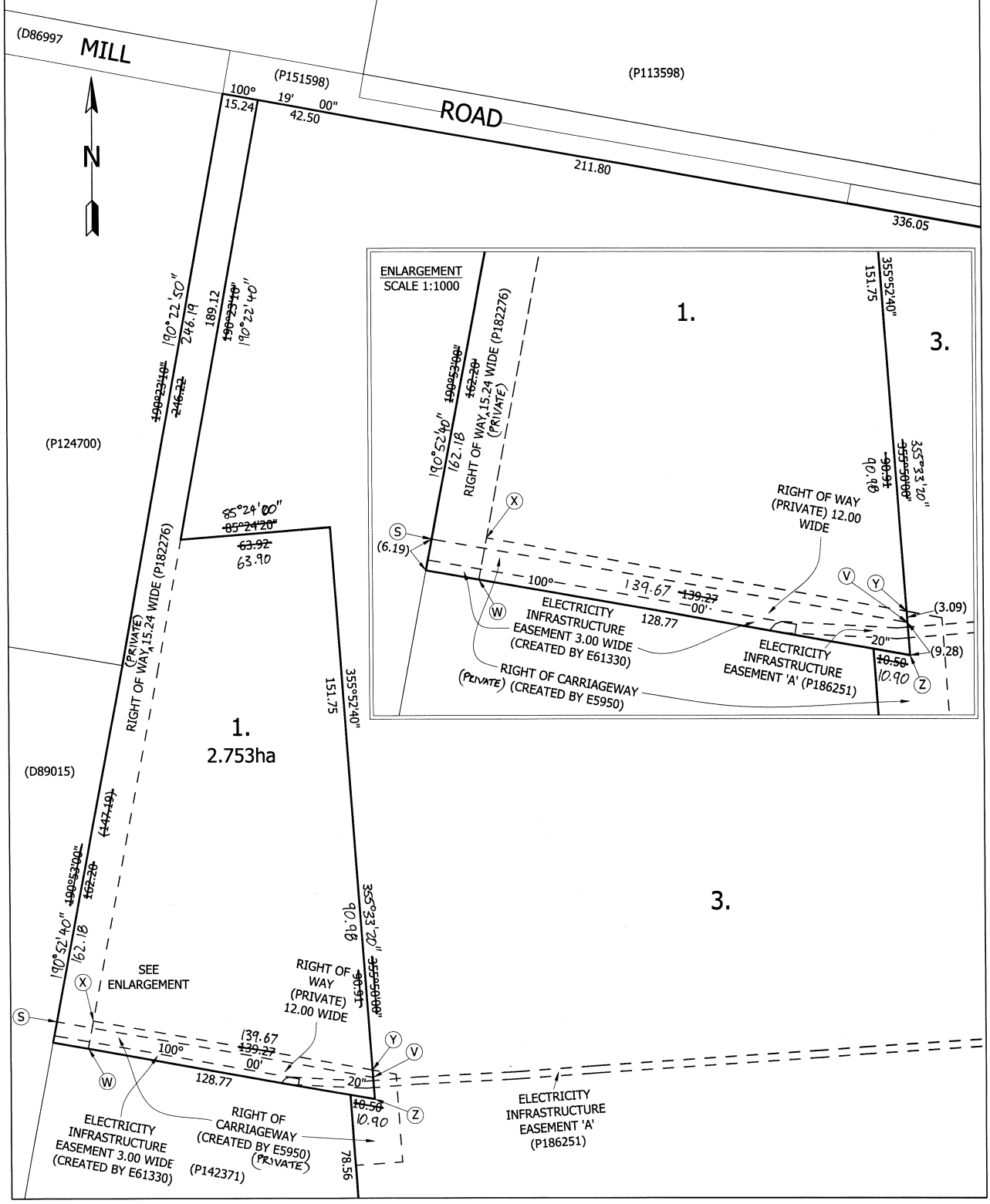


Registered Land Surveyor 26/07/2024 Date

Council Delegate 12/9/2024 Date

'Priority final Plan'

PLAN OF SURVEY ANNEXURE SHEET SHEET 1 OF 1 SHEETS NOVA LAND CONSULTING	OWNER: TANKRIS PTY LTD FOLIO REFERENCE: C.T.182276/1 SCALE 1: 1500 LENGTHS IN METRES	Registered Number SP 187534
SIGNED FOR IDENTIFICATION PURPOSES Council Delegate 26/11/24 Date	THIS ANNEXURE SHEET FORMS PART OF THE ATTACHED INDEX PLAN. Registered Land Surveyor 26/07/2024 Date	APPROVED / EFFECTIVE FROM 28 NOV 2024 Recorder of Titles



RESULT OF SEARCH

RECORDER OF TITLES

Issued Pursuant to the Land Titles Act 1980

Tasmanian Government

SEARCH OF TORRENS TITLE

VOLUME	FOLIO
187534	1
EDITION	DATE OF ISSUE
1	28-Nov-2024

SEARCH DATE : 08-Apr-2026
SEARCH TIME : 10.56 am

DESCRIPTION OF LAND

Parish of TEMPLETON Land District of DEVON
Lot 1 on Sealed Plan 187534
Derivation : Part of Lot 6230, 320 Acres Gtd. to William Taylor Noyes
Prior CT 182276/1

SCHEDULE 1

M751177 TRANSFER to TANKRIS PTY LTD Registered 10-Apr-2019 at noon

SCHEDULE 2

Reservations and conditions in the Crown Grant if any
SP187534 EASEMENTS in Schedule of Easements
SP187534 FENCING PROVISION in Schedule of Easements
E386543 AGREEMENT pursuant to Section 78 of the Land Use Planning and Approvals Act 1993 Registered 28-Nov-2024 at noon

UNREGISTERED DEALINGS AND NOTATIONS

N122862 PRIORITY NOTICE reserving priority for 90 days TRANSFER Tankris Pty Ltd as Trustee for Wesley Vale Unit Trust to Firmus Technologies Pty Ltd Lodged by RAE & PARTNERS(DPO) on 14-Jan-2026 BP: N122862
N289810 TRANSFER to FIRMUS TECHNOLOGIES PTY LTD Lodged by RAE & PARTNERS(DPO) on 04-Mar-2026 BP: N289810

SCHEDULE OF EASEMENTS	Registered Number
NOTE: THE SCHEDULE MUST BE SIGNED BY THE OWNERS & MORTGAGEES OF THE LAND AFFECTED. SIGNATURES MUST BE ATTESTED.	SP187534

EASEMENTS AND PROFITS

Each lot on the Plan is together with:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as may be necessary to drain the stormwater and other surplus water from such lot; and
(2) any easements or profits a prendre described hereunder.
Each lot on the Plan is subject to:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as passing through such lot as may be necessary to drain the stormwater and other surplus water from any other lot on the Plan; and
(2) any easements or profits a prendre described hereunder.
The direction of the flow of water through the drainage easements shown on the Plan is indicated by arrows.

EASEMENTS

Lot 1 is subject to a Right of Carriageway (appurtenant to the land shown in deeds office diagram 89/75) over the land marked "Right of Way 15.24 Wide (P182276)".
(Private)

Lot 1 is subject to the full and unrestricted right (appurtenant as aforesaid) for The Hydro Electric Commission at all times hereafter across the land marked "Right of Way 15.24 Wide (P182276)" for towers, poles, wires and other necessary apparatus and appliances for the purpose of transmitting and distributing electrical energy.
to construct and maintain in under along and *

Lot 1 is subject to a burdening Electricity Infrastructure Easement with the benefit of a restriction as to user of land in favour Tasmanian Networks Pty Ltd on the terms prescribed in E61330 over the land marked "Electricity Infrastructure Easement 3.00 Wide (created by E61330)".
on the Plan

Each of Lots 1 and 3 are subject to a Right of Carriageway in favour of Lot 1 on plan 142371 over those parts of the "Right of Carriageway (created by E5950)" shown on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way 15.24 Wide (P182276)" shown on the plan.
(Private)

Lot 3 is together with a Right of Carriageway over the "Right of Way 15.24 (P182276)" shown passing through Lot 1 on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way (private) 12.00 Wide" marked "WXYZ"

Lot 3 is together with a Right of Carriageway over the "Right of Way (private) 12.00 Wide" marked "WXYZ" shown passing through Lot 1 on the plan.

~~Lot 1 is subject to a Right of Drainage in favour of Lot 3 over the "Drainage Easement "C" 6.00 Wide" shown on the plan.~~

(USE ANNEXURE PAGES FOR CONTINUATION)

SUBDIVIDER: Tankris Pty Ltd	PLAN SEALED BY: Latrobe Council
FOLIO REF: 182276/1	DATE: 12/9/2024
SOLICITOR & REFERENCE: Will Edwards Rae & Partners Lawyers	L-DA254/2022 REF NO.
	Council Delegate

NOTE: The Council Delegate must sign the Certificate for the purposes of identification.

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* Amelia Kate Goss 11/11/24
as solicitor for Subdivider

ANNEXURE TO SCHEDULE OF EASEMENTS PAGE 2 OF 2 PAGES	Registered Number SP 187534
SUBDIVIDER: Tankris Pty Ltd FOLIO REFERENCE: 182276/1	

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FENCING PROVISION

In respect of each Lot on the Plan the Owners, Tankris Pty Ltd shall not be required to fence.

EXECUTED by **TANKRIS PTY LTD** (ACN 009 573 899) as the registered proprietor of the property comprised in Folio of the Register Volume 182276 Folio 1 in accordance with Section 127 of the Corporations Act 2001:

.....
[Director] Anthony Wayne Seymour

.....
[Director/~~Secretary~~] Nadia Ana Seymour

Lot 3 is together with pipeline rights and other rights (more fully set forth in C81401) over the areas marked "Pipeline Easement (P129424)" and "monitoring station Easement 'A'" (subject to the conditions mentioned therein) on the plan. * & 'B'

* Amelia Kate Cox as solicitor for the Subdivider 11/11/24

NOTE: Every annexed page must be signed by the parties to the dealing or where the party is a corporate body be signed by the persons who have attested the affixing of the seal of that body to the dealing.

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Construction Program

Annexure B

pitt&sherry

Date : 29/09/26
Planner : DU Checked: CM
Revision : G

WESLEY VALE
226 MILL ROAD, WESLEY VALE, TASMANIA
MASTER PROGRAMME

ID	Task Name	Dur	Start	Finish	Float	Predecessors	Successors
1	**WESLEY VALE - KEY PROJECT MILESTONES**	**392 d**	**Mon 04/05/26**	**Tue 21/09/27**			
2	**BUILDING PERMISSIONS**	**219 d**	**Fri 29/05/26**	**Mon 15/03/27**			
3	*PER.01 DA Lodgement*	*0 d*	*Fri 29/05/26*	*Fri 29/05/26*		*63*	
4	*PER.02 DA Approval*	*0 d*	*Thu 03/12/26*	*Thu 03/12/26*		*64*	
5	*PER.03 Building Permit: Civil & Substructure*	*0 d*	*Thu 07/01/27*	*Thu 07/01/27*		*105,78*	
6	*PER.03 Building Permit: Superstructure & Services*	*0 d*	*Fri 12/02/27*	*Fri 12/02/27*		*86*	
7	*PER.03 Building Permit: Remaining Works*	*0 d*	*Mon 15/03/27*	*Mon 15/03/27*		*93*	
8	**DESIGN**	**241 d**	**Mon 04/05/26**	**Mon 15/03/27**			
9	*DES.01 Basis of Design (BOD) Start*	*0 d*	*Mon 04/05/26*	*Mon 04/05/26*		*62SS*	
10	*DES.02 30% Basis of Design (BOD) Complete*	*0 d*	*Thu 13/08/26*	*Thu 13/08/26*		*89*	
11	*DES.04 Concept Design Start*	*0 d*	*Fri 03/07/26*	*Fri 03/07/26*		*75SS*	
12	*DES.05 60% Concept Design Complete*	*0 d*	*Thu 07/01/27*	*Thu 07/01/27*		*77,105*	
13	*DES.06 90% Detailed Design Start*	*0 d*	*Fri 31/07/26*	*Fri 31/07/26*		*76SS*	
14	*DES.07 90% Detailed Design Complete*	*0 d*	*Thu 19/11/26*	*Thu 19/11/26*		*91*	
15	*DES.08 Masterplan Design Complete*	*0 d*	*Mon 15/03/27*	*Mon 15/03/27*		*93*	
16	**UTILITIES**	**62 d**	**Thu 10/12/26**	**Mon 15/03/27**			
17	*UTL.01 Capacity Confirmation*	*0 d*	*Thu 10/12/26*	*Thu 10/12/26*		*67*	
18	*UTL.02 Preliminary Connection Agreement*	*0 d*	*Thu 21/01/27*	*Thu 21/01/27*		*68*	
19	*UTL.03 Final Connection Contract*	*0 d*	*Mon 15/03/27*	*Mon 15/03/27*		*70*	
20	**COMMERCIAL & PROCUREMENT**	**119 d**	**Tue 10/11/26**	**Wed 28/04/27**			
21	*LLE.01 Raise PO / Contract Execution*	*0 d*	*Wed 11/11/26*	*Wed 11/11/26*		*116*	
22	**ADIABATIC COOLERS**	**118 d**	**Wed 11/11/26**	**Wed 28/04/27**			
23	*LLE.02 FAT / QA Inspection On-site*	*0 d*	*Wed 11/11/26*	*Wed 11/11/26*		*122SS*	
24	*LLE.03 Available for Shipping/Tracking*	*0 d*	*Wed 28/04/27*	*Wed 28/04/27*		*122*	
25	*LLE.04 Delivered to Site (per separable portion)*	*0 d*	*Wed 28/04/27*	*Wed 28/04/27*		*123*	
26	**PTU's**	**89 d**	**Tue 10/11/26**	**Wed 17/03/27**			
27	*LLE.02 FAT / QA Inspection On-site*	*0 d*	*Tue 10/11/26*	*Tue 10/11/26*		*152FS+1 d*	
28	*LLE.03 Available for Shipping/Tracking*	*0 d*	*Fri 05/02/27*	*Fri 05/02/27*		*153FS-31 d*	
29	*LLE.04 Delivered to Site (per separable portion)*	*0 d*	*Wed 17/03/27*	*Wed 17/03/27*		*153*	
30	**CHILLERS**	**118 d**	**Wed 11/11/26**	**Wed 28/04/27**			
31	*LLE.02 FAT / QA Inspection On-site*	*0 d*	*Wed 11/11/26*	*Wed 11/11/26*		*126SS*	
32	*LLE.03 Available for Shipping/Tracking*	*0 d*	*Wed 28/04/27*	*Wed 28/04/27*		*126*	
33	*LLE.04 Delivered to Site (per separable portion)*	*0 d*	*Wed 28/04/27*	*Wed 28/04/27*		*127*	
34	**HEAD CONTRACTOR CONSTRUCTION**	**231 d**	**Wed 18/11/26**	**Tue 21/09/27**			
35	*DEL.00 Site Access*	*0 d*	*Wed 18/11/26*	*Wed 18/11/26*		*156SS*	
36	*DEL.01 Early Works Complete*	*0 d*	*Fri 05/02/27*	*Fri 05/02/27*		*174*	
37	*DEL.02 Temporary Power Available*	*0 d*	*Sat 12/12/26*	*Sat 12/12/26*		*166*	
38	*DEL.03 Substructures*	*0 d*	*Thu 15/04/27*	*Thu 15/04/27*		*479,483*	
39	*DEL.04 Superstructures (Incl. Ground Slabs Data Hall)*	*0 d*	*Wed 26/05/27*	*Wed 26/05/27*		*525,532*	
40	*DEL.06 Roof + Bldg Watertight*	*0 d*	*Wed 12/05/27*	*Wed 12/05/27*		*521,529*	
41	*DEL.07 External Wall Cladding*	*0 d*	*Mon 17/05/27*	*Mon 17/05/27*		*524,531*	
42	*DEL.08 Install Adiabatic, Chillers & Connection*	*0 d*	*Tue 22/06/27*	*Tue 22/06/27*		*298*	
43	*DEL.09 Generator, PTU Install & Connection*	*0 d*	*Fri 09/07/27*	*Fri 09/07/27*		*836*	
44	*DEL.10 Fire Protection System*	*0 d*	*Tue 22/06/27*	*Tue 22/06/27*		*853*	
45	*DEL.11 Other External Plants*	*0 d*	*Tue 22/06/27*	*Tue 22/06/27*		*853*	
46	*DEL.12 Base Build Fitout*	*0 d*	*Fri 28/05/27*	*Fri 28/05/27*		*564*	
47	*DEL.13 DH Fitout*	*0 d*	*Fri 11/06/27*	*Fri 11/06/27*		*568*	
48	*DEL.14 Cable Rack & Network Install*	*0 d*	*Wed 18/08/27*	*Wed 18/08/27*		*657*	*54*
49	*DEL.15 HIRD & HCDU Fitout*	*0 d*	*Sat 11/09/27*	*Sat 11/09/27*		*660*	
50	*DEL.16 Hyper Cube Connections/Config*	*0 d*	*Fri 03/09/27*	*Fri 03/09/27*		*686*	

WESLEY VALE
226 MILL ROAD, WESLEY VALE, TASMANIA
MASTER PROGRAMME

ID	Task Name	Dur	Start	Finish	Float	Predecessors	Successors
51	*DEL.17 Early Access - DH Fitout*	*0 d*	*Tue 10/08/27*	*Tue 10/08/27*		*698SS*	
52	*DH.18 Energization or Permanent Power Available*	*0 d*	*Mon 15/03/27*	*Mon 15/03/27*		*70*	
53	*DEL.18 Whitespace Available*	*0 d*	*Tue 21/09/27*	*Tue 21/09/27*		*944*	
54	*DEL.20 Computer & Network Configure*	*0 d*	*Wed 18/08/27*	*Wed 18/08/27*		*48*	
55	**COMMISSIONING & HANDOVER**	**15 d**	**Fri 03/09/27**	**Tue 21/09/27**			
56	*COM.01 L2 Commissioning*	*0 d*	*Fri 03/09/27*	*Fri 03/09/27*		*940SS*	
57	*COM.02 L3 Commissioning*	*0 d*	*Tue 14/09/27*	*Tue 14/09/27*		*940*	
58	*COM.03 L4 Commissioning*	*0 d*	*Tue 21/09/27*	*Tue 21/09/27*		*943,701*	
59	*COM.06 Project Complete*	*0 d*	*Tue 21/09/27*	*Tue 21/09/27*		*943,701*	
60	**PRINCIPAL RESPONSIBILITIES**	**213 d**	**Mon 04/05/26**	**Mon 15/03/27**	**-14 d**		
61	**DA DOCUMENTS**	**153 d**	**Mon 04/05/26**	**Thu 03/12/26**	**-14 d**		
62	DA Documents - Prepare for Submission	15 d	Mon 04/05/26	Fri 22/05/26	-14 d		63,73SS,81SS,9SS
63	DA Documents - Collate & Submit for Authority Review	5 d	Mon 25/05/26	Fri 29/05/26	-14 d	62	64,95,3
64	DA Documents - Review / Exhibition Period	133 d	Mon 01/06/26	Thu 03/12/26	-14 d	63	65,4
65	*DA Documents - DA Approved / Obtained*	*0 d*	*Thu 03/12/26*	*Thu 03/12/26*	*-14 d*	*64*	*103,77,67*
66	**ELECTRICITY KIOSK**	**60 d**	**Fri 04/12/26**	**Mon 15/03/27**	**140 d**		
67	Capacity Calculation	5 d	Fri 04/12/26	Thu 10/12/26	175 d	65	69,68,17
68	Agreement	20 d	Fri 11/12/26	Thu 21/01/27	175 d	67	69,18
69	*Electricity Substation Plant & Equipment - Order + Lead Time*	*0 d*	*Thu 21/01/27*	*Thu 21/01/27*	*175 d*	*67,68*	
70	*Electricity Substation Complete 'Power On' / Required By*	*0 d*	*Mon 15/03/27*	*Mon 15/03/27*	*91 d*		*52,19,921*
71	**DETAIL DESIGN + STAGED BA's**	**213 d**	**Mon 04/05/26**	**Mon 15/03/27**	**0 d**		
72	**CIVIL & SUBSTRUCTURE**	**169 d**	**Mon 04/05/26**	**Fri 08/01/27**	**-14 d**		
73	Concept Design Development & Sign Off	13 d	Mon 04/05/26	Wed 20/05/26	0 d	62SS	74,81FS-5 d
74	30% Design Development & Sign Off	30 d	Thu 21/05/26	Thu 02/07/26	46 d	73	75
75	60% Design Development & Sign Off	20 d	Fri 03/07/26	Thu 30/07/26	46 d	74	76,11SS
76	90% Design Development & Sign Off	30 d	Fri 31/07/26	Thu 10/09/26	46 d	75	77,13SS
77	BA-01 Building Surveyor Review / Documents Updated & Loaded to Portal	15 d	Fri 04/12/26	Thu 07/01/27	-14 d	76,65	78,12
78	*BA-01 Approved / Obtained (Civil & Substructure)*	*0 d*	*Thu 07/01/27*	*Thu 07/01/27*	*-14 d*	*77,105*	*79,85FS-5 d,5*
79	Building Works Commencement Notification (24 Hours Prior to Commencement Onsite)	1 d	Fri 08/01/27	Fri 08/01/27	-14 d	78	168
80	**SUPERSTRUCTURE & SERVICES**	**185 d**	**Thu 14/05/26**	**Fri 12/02/27**	**0 d**		
81	Concept Design Development & Sign Off	15 d	Thu 14/05/26	Wed 03/06/26	0 d	62SS,73FS-5 d	82,88FS-5 d
82	30% Design Development & Sign Off	40 d	Thu 04/06/26	Thu 30/07/26	30 d	81	83
83	60% Design Development & Sign Off	30 d	Fri 31/07/26	Thu 10/09/26	30 d	82	84
84	90% Design Development & Sign Off	40 d	Fri 11/09/26	Thu 05/11/26	30 d	83	85
85	BA-02 Building Surveyor Review / Documents Updated & Loaded to Portal	30 d	Fri 18/12/26	Fri 12/02/27	0 d	84,78FS-5 d	86,92FS-10 d
86	*BA-02 Approved / Obtained (Superstructure & Services)*	*0 d*	*Fri 12/02/27*	*Fri 12/02/27*	*0 d*	*85*	*6,487*
87	**REMAINING WORKS**	**195 d**	**Thu 28/05/26**	**Mon 15/03/27**	**0 d**		
88	Concept Design Development & Sign Off	15 d	Thu 28/05/26	Thu 18/06/26	0 d	81FS-5 d	89
89	30% Design Development & Sign Off	40 d	Fri 19/06/26	Thu 13/08/26	0 d	88	90,10
90	60% Design Development & Sign Off	30 d	Fri 14/08/26	Thu 24/09/26	0 d	89	91,95
91	90% Design Development & Sign Off	40 d	Fri 25/09/26	Thu 19/11/26	43 d	90	92,149,14
92	BA-02 Building Surveyor Review / Documents Updated & Loaded to Portal	30 d	Mon 01/02/27	Mon 15/03/27	3 d	91,85FS-10 d	93
93	*BA-03 Approved / Obtained (Remaining Works)*	*0 d*	*Mon 15/03/27*	*Mon 15/03/27*	*3 d*	*92*	*15,535,7*
94	**HEAD CONTRACTOR ENGAGEMENT (DESIGN & CONSTRUCT)**	**54 d**	**Fri 21/08/26**	**Wed 04/11/26**	**0 d**		
95	*60% Desin Complete*	*0 d*	*Thu 24/09/26*	*Thu 24/09/26*	*0 d*	*63,90*	*96FS-25 d,152*
96	Finalise & Submit GMP	30 d	Fri 21/08/26	Thu 01/10/26	0 d	95FS-25 d	97
97	Stakeholder Review & Clarifications	10 d	Fri 02/10/26	Thu 15/10/26	0 d	96	98
98	Prepare & Submit Best & Final Offer (BAFO)	5 d	Fri 16/10/26	Thu 22/10/26	0 d	97	99
99	Final Contract Negotiations & Exchange	9 d	Fri 23/10/26	Wed 04/11/26	0 d	98	100

WESLEY VALE
226 MILL ROAD, WESLEY VALE, TASMANIA
MASTER PROGRAMME

ID	Task Name	Dur	Start	Finish	Float	Predecessors	Successors
100	*Contract Award Date*	*0 d*	*Wed 04/11/26*	*Wed 04/11/26*	*0 d*	*99*	*131,134,108,132,136,143*
101	**PRECONSTRUCTION**	**115 d**	**Thu 05/11/26**	**Tue 04/05/27**	**0 d**		
102	**AUTHORITY APPROVALS**	**15 d**	**Fri 04/12/26**	**Thu 07/01/27**	**-14 d**		
103	Local Authority - Satisfy Conditions of Consent & Submit Council (Principal & Builder)	5 d	Fri 04/12/26	Thu 10/12/26	-14 d	65	104
104	Local Authority - Review of Submitted Documentation (Provisional Time Period)	10 d	Fri 11/12/26	Thu 07/01/27	-14 d	103	105
105	*Local Authority - Approval to Commence Onsite*	*0 d*	*Thu 07/01/27*	*Thu 07/01/27*	*-14 d*	*104*	*78,5,12*
106	**SUBCONTRACT LETTING (CRITICAL TRADES)**	**115 d**	**Thu 05/11/26**	**Tue 04/05/27**	**0 d**		
107	**STRUCTURAL STEELWORK**	**61 d**	**Thu 05/11/26**	**Fri 12/02/27**	**0 d**		
108	Structural Steelwork - Final Negotiations Preferred Contract / Award Contract	3 d	Thu 05/11/26	Mon 09/11/26	0 d	100	109
109	Structural Steelwork - Finalise & Submit Shop Drawings	5 d	Tue 10/11/26	Mon 16/11/26	0 d	108	110
110	Structural Steelwork - Client Review & Approval	5 d	Tue 17/11/26	Mon 23/11/26	0 d	109	111
111	Structural Steelwork - Finalise Shop Drawings Prior to Ordering	3 d	Tue 24/11/26	Thu 26/11/26	0 d	110	112
112	*Structural Steelwork - Order Steelwork / Commence Fabrication*	*0 d*	*Thu 26/11/26*	*Thu 26/11/26*	*0 d*	*111*	*113*
113	Structural Steelwork - Lead In Time	45 d	Fri 27/11/26	Fri 12/02/27	0 d	112	114
114	*Structural Steelwork - Initial Site Delivery*	*0 d*	*Fri 12/02/27*	*Fri 12/02/27*	*0 d*	*113*	*487*
115	**BENMAX**	**111 d**	**Thu 05/11/26**	**Wed 28/04/27**	**29 d**		
116	Final Contract Negotiations / Exchange	5 d	Thu 05/11/26	Wed 11/11/26	29 d	100	117,118,21
117	*Mechanical Design Complete & Signed Off By Client*	*0 d*	*Wed 11/11/26*	*Wed 11/11/26*	*29 d*	*116*	*118*
118	*Contract Commencement*	*0 d*	*Wed 11/11/26*	*Wed 11/11/26*	*29 d*	*117,116*	*119,122,126*
119	Finalise Shop Drawings	15 d	Thu 12/11/26	Wed 02/12/26	57 d	118	120,121,129,128,124FS+5
120	Pipework for Culverts - Manufacture & Deliver	40 d	Thu 03/12/26	Thu 11/02/27	92 d	119	410
121	Mech / Elec Switchboards - Manufacture & Deliver	45 d	Thu 03/12/26	Thu 18/02/27	100 d	119	574
122	Adiabatic Cooling System (ADC) - Manufacture	24 ewks	Wed 11/11/26	Wed 28/04/27	7.95 ewks	118	123,23SS,24
123	*Adiabatic Cooling System (ADC) - First Delivery*	*0 d*	*Wed 28/04/27*	*Wed 28/04/27*	*38 d*	*122*	*257,25*
124	Pipe Modules & Pump Skid Systems (ADC) - Manufacture 6 No.	30 d	Thu 10/12/26	Thu 04/02/27	81 d	119FS+5 d	125
125	Pipe Modules & Pump Skid Systems (ADC) - Delivery	10 d	Fri 05/02/27	Thu 18/02/27	81 d	124	255
126	Roof Chillers - Manufacture 16 No.	24 ewks	Wed 11/11/26	Wed 28/04/27	8.09 ewks	118	127,31SS,32
127	*Roof Chillers - First Delivery*	*0 ewks*	*Wed 28/04/27*	*Wed 28/04/27*	*8.09 ewks*	*126*	*571,33*
128	Hypercube System Manifolds 8 No. - Manufacture & Deliver	15 d	Thu 03/12/26	Wed 06/01/27	67 d	119	618
129	HIRD system (HPNU's 32 No. / HACU's 32 No. / HECU 4 No. / HIPEU 4 No.) - Manufacture & Deliver	25 d	Thu 03/12/26	Wed 20/01/27	57 d	119	618
130	**REMAINING TRADES**	**115 d**	**Thu 05/11/26**	**Tue 04/05/27**	**0 d**		
131	Let Site Establishment Subcontracts / Mobilise Onsite Staff	10 d	Thu 05/11/26	Wed 18/11/26	0 d	100	156
132	Bulk Earthworks & Enabling Works - Tender, Evaluate & Award	15 d	Thu 05/11/26	Wed 25/11/26	3 d	100	133
133	Bulk Earthworks & Enabling Works - Procure Plant / Mobilise to Site	5 d	Thu 26/11/26	Wed 02/12/26	3 d	132	169
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135	CMC (Controlled Modulus Column) Piling - Procure Plant / Mobilise to Site	20 d	Thu 26/11/26	Wed 06/01/27	8 d	134	179,438
136	Precast Plinths (Adiabatic Coolers) - Tender, Evaluate & Award	15 d	Thu 05/11/26	Wed 25/11/26	96 d	100	137
137	Precast Plinths (Adiabatic Coolers) - Shop Drwgs & Apprv's / Lead In Time	31 d	Thu 26/11/26	Thu 21/01/27	96 d	136	201
138	Precast Box Culverts - Tender, Evaluate & Award	15 d	Thu 05/11/26	Wed 25/11/26	87 d	100	139
139	Precast Box Culverts - Shop Drwgs & Apprv's / Lead In Time	31 d	Thu 26/11/26	Thu 21/01/27	87 d	138	203
140	Main Services (D&C) - Tender, Evaluate & Award	15 d	Thu 12/11/26	Wed 02/12/26	58 d	100FS+5 d	141
141	Main Services (D&C) - Shop Drwgs & Apprv's / Mobilise to Site	20 d	Thu 03/12/26	Wed 13/01/27	58 d	140	142
142	Main Services (D&C) - Lead In Time Major Plant (Comms / MSB etc)	75 d	Thu 14/01/27	Tue 04/05/27	58 d	141	692
143	Structure (Precast Panels) - Tender, Evaluate & Award	15 d	Thu 12/11/26	Wed 02/12/26	0 d	100FS+5 d	144
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145	Structure (Concrete Trades) - Tender, Evaluate & Award	20 d	Thu 19/11/26	Wed 16/12/26	5 d	100FS+10 d	146
146	Structure (Concrete Trades) - Reo. Schedules / Lead In Time	20 d	Thu 17/12/26	Thu 28/01/27	5 d	145	463
147	Data Hall: Roofing - Tender, Evaluate & Award	20 d	Thu 19/11/26	Wed 16/12/26	7 d	100FS+10 d	148
148	Data Hall: Roofing - Shop Drwgs & Apprv's / Lead In Time	30 d	Thu 17/12/26	Thu 11/02/27	7 d	147	489

Planning Application Report & Application Form

Annexure C

pitt&sherry

Office Use Only	
Application No	PID

LATROBE COUNCIL

DEVELOPMENT APPLICATION

Application for Development Permit under Section 58 or Section 57 of the
Land Use Planning and Approvals Act 1993, and
Request for Development Certification for when No Permit Required.

1 Full Name of Applicant(s): Katrina Hill (pitt&sherry) obo Firmus Technologies

2 Postal Address of Applicant(s) c/- pitt&sherry

Level 2, York Street, Launceston TAS Phone: (03) 6323 1978

Mobile No.: 0409 940 578 Email: khill@pittsh.com.au

3 Full Name of Owner(s): TANKRIS PTY LTD

4 Postal Address of Owner(s): PO BOX 638 LAUNCESTON TAS 7250

Phone:

Mobile No. Email:

5 Present Use of the Land: Vacant (developable area)

6 Proposed Use and/or Development (subject of this application):
Construction and operation of utility-scale advanced computing infrastructure, including data hall buildings, ancillary office and maintenance facilities, substations, cooling systems, and associated infrastructure.

At (Location of property): 174 & 226 MILL RD WESLEY VALE TAS 7307

Certificate/s of Title reference: 187534/1 (& 187534/3)

7 Estimate costs of development: $ 31,250,000.00

8 Supporting Details: **A CHECK LIST IS PROVIDED ON THE NEXT PAGE AND MUST BE ACKNOWLEDGED AND SIGNED BY THE APPLICANT.**

Signed RHill **Dated:** 28.05.2026

CHECKLIST - APPLICATION DOCUMENTATION:-

1. A copy of the Certificate of Title, Folio Text, Folio Plan and any Schedule of Easements (if any) for the subject land
2. A copy of all plans and specifications for the proposed development, including the following where applicable.

(a) A site plan, drawn to scale, showing:

the location of all existing and proposed development on the title;

i. the dimensions and use of all buildings and /or development;
ii. the distances of buildings from each other and the title boundaries;
iii. the location of the on-site waste water management system and drains in relation to the building development and the title boundaries; and
iv. the location of access and car parking arrangements.

(b) Detail in regard to:

i. site preparation, including details of buildings and works to be demolished, areas to be cut and filled and trees to be removed and other land clearing;
ii. advertising signs including dimensions, wording, logos, colours, illumination, supporting structures and positions on land, building and works;
iii. floodlighting and other exterior lighting including the location and direction of light sources and the strength of illumination;
iv. landscaping; including location, dimensions and detail of site enhancement, tree planting and screening;
v. materials proposed for construction purposes and the colour of such materials on all exterior surfaces;

(c) Floor plans and elevations of all proposed buildings, relative site levels, provisions for drainage and the purpose of rooms, other enclosed spaces and structures;

(d) Description of proposed use including:

i. Number of employees;
ii. Number, type and frequency of vehicles servicing the site;
iii. Any hazardous chemicals to be stored on the site; and
iv. Hours and days of operation.

ADDITIONAL INFORMATION MAY BE REQUESTED AT THE DISCRETION OF THE PLANNERS

HERITAGE TASMANIA INFORMATION

(a)	Is the property on the Tasmanian Heritage Register?	Yes /	No
(b)	Have you sought advice from Heritage Tasmania?	Yes /	No
(c)	Has a Certificate of Exemption been sought for these works?	Yes /	No

TO BE COMPLETED BY THE APPLICANT:-

I/We declare that the information given is a true and accurate representation of the proposed development. I/We understand that the information and materials provided with the development application may be made available to the public and that the Council may make such copies of the information and materials as in its opinion are necessary to facilitate a thorough consideration of the Permit Application. I/We have obtained the relevant permission of the copyright owner for the communication and reproduction of the plans accompanying the development application for the purposes of assessment of that application. I/We indemnify the Latrobe Council for any claim or action taken against it in respect of breach of copyright in respect of any of the information or material provided.

I/We also acknowledge that, in the course of inspections and investigations relating to this application, it may be necessary for Council officers to enter upon the land which is the subject of this application. Accordingly, permission is hereby given for that purpose provided reasonable attempts are made on site to inform any resident or occupant at the time.

Print Name Katrina Hill (pitt&sherry) **Date:** 28.05.2026

INSTRUCTION FOR MAKING A PERMIT APPLICATION

(a) Use or development?

The application must provide a full description of the proposed use and/or development and of the manner in which the use and/or development is to operate. (Eg: dwelling and shed or subdivision # lots).

"Use" is the purpose or manner for which land is utilised. "Development" is any site works (including any change in natural condition or topography of land and the clearing or conversion of vegetation), and the construction, alteration, or removal of buildings, structures and signs, required in order to prepare a site for use or to change existing conditions within a site. Subdivision is development.

Clause 6.2 of the Tasmanian Planning Scheme - Latrobe provides the use classes by which all use or development must be described. Development must be categorised by reference to the use class it is to serve.

(b) Required Information

Adequate statements, plans and specifications must be included within the permit application to address and demonstrate compliance with all applicable requirements of the planning scheme, including any site analysis, impact report and recommendation, and advice, consent or determination required from a State agency or utility entity. The application must clearly identify the documents relied upon for determination.

Section 51(1AC) *Land Use Planning and Approvals Act 1993* provides that a permit application is not valid unless it includes all of the information required by a planning scheme. Clause 6.1 of the Tasmanian Planning Scheme - Latrobe prescribes the minimum information that is necessary in order to complete a valid permit application.

S54 *Land Use Planning and Approvals Act 1993* provides that the planning authority may require the applicant to supply further information before it considers a permit application. If the planning authority requires further information to more particularly address one or more of the applicable requirements of Tasmanian Planning Scheme - Latrobe, the statutory period for determination of a permit application does not run until that information is answered to the satisfaction of the planning authority

(c) Applicable Provisions and Standards

The permit application must be assessed against the applicable provisions and standards of the Tasmanian Planning Scheme - Latrobe. The application is to identify by reference the clauses it relies upon to demonstrate compliance. (eg *clause 8.4.3 (A1 – A4, and P5*)

(d) Discretionary Permits

If a permit is discretionary the permit application must be notified for a period of 14 days to allow opportunity for any interested person to consider the proposed use and/or development and to provide comment on the discretionary matter.

If a permit application relies on performance criteria to satisfy an applicable standard or is discretionary under another provision of the Planning Scheme, the permit is discretionary only with respect to that standard.

The Council must have regard to all representations received during the notification period on a discretionary matter when determining whether to grant or refuse a permit.

(e) If the applicant is not the landowner

If the applicant is not the owner of the land in the use or development site, the applicant is required to notify all of the owners either prior to or within 7 days from the date of making the permit application.

The permit application must identify all of the landowners; and the applicant must sign the application form to acknowledge the obligation to advise such landowners that the permit application has been made.

If the site includes land owned or administered by the Latrobe Council or by a State Government agency, the consent in writing from the Council or the Minister responsible for Crown land must be provided at the time of making the application.

(f) Applicant declaration

It is an offence for a person to do any act that is contrary to a compliance requirement created under the section 63 *Land Use Planning and Approvals Act 1993*. The applicant is required to complete a declaration that the information given in the permit application is true and correct.

(g) Payment of Fees

The Council is not required to take any action on the permit application until all the relevant fees have been paid.

If the permit application involves land owned or administered by the LATROBE COUNCIL

Latrobe Council consents to the making of this permit application.

General Manager (Signature) Date

If the permit application involves land owned or administered by the CROWN

I, the Minister responsible for the land, consent to the making of this permit application.

Minister (Signature) Date

Notification of Landowner/s (s.52 Land Use Planning and Approvals Act, 1993)

If land is not in applicant's ownership

I, Katrina Hill (pitt&sherry) declare that the owner /each of the owners of the land has/have been notified of my/our intent to make this permit application.

Applicant's signature:  Date 28.05.2026

ELECTRONIC APPLICATIONS ARE ENCOURAGED,
Email to: Planning@latrobe.tas.gov.au

pitt&sherry



Planning Report

Advanced Computing Infrastructure

Wesley Vale

Prepared for
Firmus Technologies

Client representative
Andrew Buls (Head of Construction & Deployment)

Date
25 August 2026

Rev00

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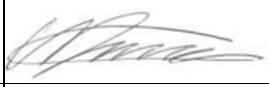
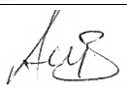
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Appendices

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Appendix B - Development Drawings
Appendix C - Traffic Impact Assessment
Appendix D – Noise Assessment
Appendix E – Wastewater
Appendix F – Water Supply
Appendix G – Bushfire Hazard Management Plan
Appendix H – Emergency Management Strategy

Prepared by - K Hill		Date - 26 May 2026
Reviewed by – C Davis		Date - 27 May 2026
Authorised by - A Buckley		Date – 18 August 2026

Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
Rev A	Client draft	KH	Client & AB	AB	26.5.2026
Rev00	Report issued for release	KH	CD & AB	AB	28.5.2026
Rev00	Report Amened (Bushfire)	KH	-	KH	17.08.2026
Rev00	Report Amened (minor grammar)	KH	-	KH	25.08.2026

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Executive Summary

Client:	Firmus Technologies
Property Owner[s]:	TANKRIS PTY LTD
Report Purpose:	Development Application (Planning Permit)
Planning Authority:	Latrobe Council
Project:	Advanced Computing Infrastructure
Location:	174 & 226 Mill Road, Wesley Vale
Property ID:	6524040
Certificate of Title:	182276/1 (and 187534/3)
Planning Scheme:	Tasmanian Planning Scheme – Latrobe
Zone:	General Industrial
Use Class:	Utilities (Permitted)
Overlay Code(s):	Electricity Transmission Infrastructure Protection Code (C4.0)
	Bushfire-Prone Areas Code (C13.0)
	Landslip Hazard Code (C15.0)
	Safeguarding of airports Code (C16.0)
Development Code(s):	Parking & Sustainability Code 2.0
	Road and Railway Assets 3.0
Proposed Works:	Construction and operation of utility-scale advanced computing infrastructure, comprising data hall buildings, ancillary office and maintenance facilities, electrical and cooling infrastructure, on-site substations, stormwater management and servicing infrastructure, and associated operational works. The development is to be established on a serviced industrial site and integrated with existing and proposed infrastructure networks, in accordance with the approved site layout and project drawings.
Synopsis:	The proposal comprises a Utilities use within the General Industrial Zone, providing critical digital infrastructure supported by associated electrical, cooling, water management and servicing systems. The development is appropriately located within an established industrial precinct, adjacent to major infrastructure assets, and is consistent with the purpose and intent of the zone. Assessment of the applicable planning controls and supporting technical investigations demonstrates that the proposal can be accommodated without unreasonable impacts on surrounding land, infrastructure or environmental values. Subject to the recommended conditions and technical requirements, the proposal is considered capable of complying with the Tasmanian Planning Scheme and suitable for approval.

1. Introduction

This Planning Report has been prepared in support of a Development Application for utility-scale advanced computing infrastructure (the facility) at 174 & 226 Mill Road, Wesley Vale (see Figure 1).

The subject land comprises an established industrial site that has been previously modified and serviced to accommodate large-scale industrial and infrastructure development. The site is located within an industrial setting at Wesley Vale and is assessed under the Tasmanian Planning Scheme – Latrobe. The land is zoned General Industrial, reflecting its intended role in supporting industrial activity and essential infrastructure uses that require separation from sensitive land uses.

The proposed development involves the use of industrial land to establish advanced computing infrastructure, comprising data hall buildings supported by high-capacity electrical, mechanical, cooling and servicing infrastructure. In planning terms, the proposal is appropriately classified as a Utilities use under the Tasmanian Planning Scheme, as its primary function is the provision of digital processing, data transmission and associated enabling infrastructure for external users, rather than research, testing or experimentation activities.

Due to the scale and operational characteristics of the development, the proposed Utilities use exceeds the definition of a minor utility and is therefore listed as a Permitted use within the General Industrial Zone, subject to assessment against applicable development standards and overlay codes. The proposal is accordingly subject to discretionary assessment where required to demonstrate compliance with relevant performance-based planning provisions.

This Planning Report accompanies the Development Application to demonstrate that the proposal is consistent with the purpose of the General Industrial Zone, relevant development standards and applicable overlay codes, and that it represents an appropriate and orderly use of industrial land within the Wesley Vale locality.

1.1 Legislative context

The proposal is assessed under the *Tasmanian Planning Scheme – Latrobe*, which applies to the subject site. The land is zoned General Industrial, and is affected by several overlays and codes, including:

- Overlay Areas: Bushfire-prone Areas, Airport obstacle limitation area, Low landslip hazard and Substation facility buffer area.
- Applicable Codes:
    - C2.0 Parking & Sustainable Transport
    - C3.0 Road and Railway Assets
    - C4.0 Electricity Transmission Infrastructure Protection
    - C13.0 Bushfire-Prone Areas
    - C15.0 Landslip Hazard; and
    - C16.0 Safeguarding of Airports.
- Local Provisions: Latrobe Local Provisions Schedule.
- Specific Area Plan: Not applicable.
- Site-Specific Qualifications: Not applicable.

A planning permit is required due to reliance on performance criteria under applicable codes and standards.



Figure 1: Locality map – 174 & 226 Mill Road, Wesley Vale

2. Site context

The subject site, 174 & 226 Mill Road, Wesley Vale, is an established industrial landholding that has been previously modified to accommodate large-scale industrial and infrastructure-based development (see Figure 2). The site formerly accommodated industrial warehousing associated with the Wesley Vale Pulp Mill. However, the specific site area subject to the current proposal is presently undeveloped. The land is situated within the current industrial context at Wesley Vale and is assessed under the Tasmanian Planning Scheme – Latrobe. The site is zoned General Industrial, reflecting its intended role in supporting industrial activity and infrastructure uses that require separation from sensitive land uses.

The site is generally flat in topography and comprises land that has been subject to prior modification. Earthworks are proposed to facilitate industrial use that is not considered major in nature.

Access to the site is provided via Mill Road, which connects to the surrounding road network and has been assessed as part of the accompanying Traffic Impact Assessment (TIA). This is a Council-owned sub-arterial road within the Latrobe municipality. It forms a key local industrial access route serving the Wesley Vale industrial area and associated utilities infrastructure.

Mill Road initially runs in a north–south direction from its intersection with Port Sorell Road for approximately 1.7 kilometres. It then incorporates a 90-degree left turn and continues in an east–west direction, providing access to industrial land and utilities infrastructure, including the Wesley Vale substation and former pulp mill land. Mill Road connects directly to Port Sorell Road, which is a State-owned arterial road providing an east–west connection between East Devonport and Port Sorell.

The road is subject to the Tasmanian rural default speed limit of 100 km/h, reflecting its function and low residential interface.

The access configuration is capable of supporting service vehicles, staff access and periodic heavy vehicle movements associated with plant maintenance, deliveries and operational requirements. The traffic characteristics of the proposed development are consistent with the industrial function of the locality and align with the design and capacity of the adjoining road infrastructure.



Figure 2: Aerial image showing the subject title (outlined in red) in context 174 & 226 Mill Road

The subject site (174 & 226 Mill Road, Wesley Vale) forms part of the former Wesley Vale Pulp Mill landholding, with surrounding land comprising established industrial and commercial warehousing areas together with utilities infrastructure, while the specific development footprint remains undeveloped. The proposal introduces infrastructure-based development on the site, including advanced computing facilities, water storage and treatment infrastructure, energy and communication interfaces, and supporting access and servicing areas, consistent with the established industrial and utilities context.

The broader Wesley Vale locality accommodates a diverse range of industrial, logistics and infrastructure-based land uses, reflecting its long-standing role as an industrial precinct within a predominantly agricultural setting. A significant adjoining use is the TasNetworks Wesley Vale substation, which provides capacity to support energy-intensive industrial and infrastructure-based development, including advanced computing infrastructure and associated services.

Land in the immediate vicinity is characterised by a combination of industrial and agricultural uses, including active and legacy industrial operations, electricity transmission infrastructure, industrial warehousing and storage, freight and logistics activities, and rural production land. Nearby industrial uses include the BioMar aquafeed manufacturing facility and a range of associated industrial and service-based operations such as timber product manufacturing, fibreglass and corrosion technology fabrication, hydraulic equipment supply, and agricultural servicing businesses. The surrounding rural land supports established primary production activities, including intensive horticulture operations such as the Costa berry farms, as well as broader grazing and cropping activities typical of the Wesley Vale area.

This industrial cluster is supported by proximity to Devonport Airport and established arterial road connections, enabling efficient freight, servicing and workforce access, while the surrounding agricultural land provides separation from more sensitive uses and reinforces the suitability of the locality for higher-intensity industrial and infrastructure development.

In this context, the proposed development is consistent with the established land use pattern and functional role of the area. The introduction of advanced computing infrastructure does not conflict with surrounding industrial, utilities or agricultural uses, and is compatible with the operational characteristics of the locality, including existing infrastructure, buffers and servicing arrangements. The proposal, therefore, represents an appropriate and orderly use of General Industrial land.

3. Proposal Overview

The proposed development represents utility-scale advanced computing infrastructure, forming part of the critical digital systems that support contemporary economic, social and government activity. Unlike conventional industrial uses that manufacture or process physical goods, this infrastructure performs large-scale data processing, storage and computational functions, enabling cloud services, high-performance computing, digital platforms and networked systems relied upon by businesses, institutions and the broader community.

Facilities of this nature underpin a wide range of essential services, including financial systems, communications networks, logistics, health services, research and development, and public administration. Their role is analogous to traditional infrastructure, such as energy generation or water systems, providing foundational capacity that enables other sectors to operate efficiently and reliably.

As digital demand continues to increase, there is a growing need for strategically located, utility-scale computing infrastructure that can leverage secure land, high-capacity power, and separation from sensitive uses. Industrial precincts such as Wesley Vale are well-suited to accommodate this form of development due to their established infrastructure networks, operational buffering, and ability to support large-scale, infrastructure-intensive uses.

In land use planning terms, such facilities represent a contemporary evolution of industrial activity, characterised by high infrastructure inputs, continuous operation and low on-site workforce presence. The proposal, therefore, aligns with the intent of the General Industrial Zone by providing an infrastructure-led use that is functionally comparable to other large-scale industrial and utility developments, while supporting broader regional and economic productivity.

The proposal facility is contained within an undeveloped portion of a broader industrial landholding at Mill Road, Wesley Vale adjacent to existing industrial and utilities development, including electricity infrastructure. The facility is established within a defined development footprint and supported by a secured perimeter, access control and internal circulation consistent with an industrial/infrastructure use.

The proposed facility is intended to operate on a continuous 24-hour, 7-day basis, consistent with the operational requirements of critical infrastructure. The day shift (8:00am–5:00pm) would typically have approximately 10 people on site (staff), with approximately 4 staff across two evening/night shifts (4:00pm–8:00am). Staffing levels reflect operational oversight, security, maintenance and facilities management functions associated with a highly automated facility.

The development comprises (as shown on the architectural and site plans):

- A principal data centre building accommodating the primary data hall and associated technical and administration areas (Building 1)
- Backup power infrastructure, including multiple generators and associated hardstand and servicing areas located adjacent to the main building
- Cooling infrastructure, including chillers and adiabatic cooling systems located at ground level and on the roof, supported by an integrated process water distribution network
- Water storage and treatment infrastructure, including multiple process water tanks (approximately 1,000 kL of rainwater storage), potable water storage, pump rooms and associated distribution systems
- Fire protection infrastructure, including a dedicated fire pump room, hydrant system and fire water storage tanks
- A guardhouse and secured entry arrangement, including vehicle traps, gates and perimeter fencing to control and manage site access
- On-site wastewater management infrastructure, including an aerated wastewater treatment system (AWTS) and associated subsurface irrigation disposal area
- Internal access roads, circulation areas, loading and servicing zones, parking areas and hardstand surfaces to support operational access and periodic heavy vehicle movements

All buildings, infrastructure, access and servicing works are contained within the defined development footprint identified on the plans, with any minor encroachment limited to essential services connections and infrastructure tie-ins. The layout demonstrates a consolidated and functional industrial arrangement, with the built form centrally located and supporting infrastructure distributed around the site in a manner that supports efficient operation while responding to site constraints.

Earthworks are anticipated to be limited to localised works required to establish internal access roads, hardstand areas, building platforms and tie-ins to existing levels, consistent with the proposed site layout. The extent of cut and fill will be confirmed through detailed civil design documentation. The drawings indicate that works are generally confined to the existing engineered platform and do not involve significant regrading of the broader site.

The development is supported by existing high-capacity utility infrastructure, with electrical, cooling, water storage and stormwater systems integrated within a coordinated on-site servicing network. Landscaping is intentionally limited and functional in nature, reflecting the established industrial context and avoiding unnecessary ground disturbance, while maintaining an appropriate level of site presentation and interface with surrounding land.

Overall, the proposal represents a consolidated, infrastructure-led development that utilises an existing engineered industrial platform. The design minimises earthworks and site disturbance, integrates effectively with established servicing infrastructure, and is consistent with the operational characteristics and capacity of the Wesley Vale industrial precinct.

3.1 Understanding Digital Infrastructure

The proposed development comprises utility-scale digital infrastructure within the established Wesley Vale industrial precinct. While data centres are frequently associated with contemporary discussion regarding artificial intelligence (AI), the facility is fundamentally an item of infrastructure that provides computing, storage and processing capacity capable of supporting a wide range of digital, commercial, industrial, research and public-sector applications.

Digital infrastructure increasingly forms part of essential economic and community systems. Similar to electricity, telecommunications and water infrastructure, data centres provide enabling capacity that supports a diverse range of users and activities, many of which are not known at the time infrastructure is established.

Public discussion regarding data centre developments often draws on examples from overseas jurisdictions or large-scale developments operating in substantially different environmental, regulatory and infrastructure contexts. Consequently, concerns raised in relation to data centres may not necessarily reflect the characteristics, operational requirements or environmental performance of an individual proposal.

For this reason, the assessment of the proposed development is based on the physical attributes, operational characteristics and technical investigations prepared specifically for the Wesley Vale site. Matters such as water demand, wastewater management, traffic generation, bushfire risk, noise emissions and environmental performance have been assessed through site-specific investigations accompanying this application.

The proposal incorporates significant supporting infrastructure, including cooling systems, emergency power generation, water storage, wastewater treatment and associated servicing infrastructure. The facility has been designed around a largely self-contained water management system utilising on-site storage, treatment and reuse measures to support cooling operations and staff amenities, reducing reliance on external water and wastewater services.

The planning assessment of the proposal relates to the relevant planning consideration, which is whether the proposed use and development is appropriate for the site having regard to land use compatibility, infrastructure capacity, environmental impacts, traffic and access, servicing requirements and risk management. Having regard to the accompanying technical investigations and the assessment contained within this report, the proposal is considered to represent an appropriate form of infrastructure development within the General Industrial Zone at Wesley Vale.

3.2 Strategic Justification

Wesley Vale has a documented history of heavy industrial use spanning several decades, most notably associated with the former Wesley Vale Pulp Mill, which operated on land in the locality from 1969 until 2010. The cessation of pulp mill operations in 2010 represents a change in industrial activity rather than a change in land use intent, with the area continuing to be planned and zoned for industrial and infrastructure purposes. The locality remains characterised by General Industrial and Utilities zoning, reflecting its ongoing role as an industrial and infrastructure precinct. In this context, the redevelopment of undeveloped portions of former pulp mill land for contemporary infrastructure-based uses is consistent with the established land use pattern and long-term strategic intent for the area.

Firmus and its consultants have assessed a range of sites across Tasmania for their suitability to accommodate the scale and operational requirements of the proposed development. The subject site at Wesley Vale has been identified as the preferred location for the following strategic reasons:

- The site forms part of a long-established industrial area with a history of large-scale industrial use. Portions of the land have been previously modified to support industrial development, and the site is capable of accommodating utility-scale infrastructure consistent with its zoning and physical characteristics.
- TasNetworks own and operate a major electricity transmission corridor in proximity to the site, including high-voltage transmission infrastructure. This provides the opportunity for a high-capacity and reliable power supply suitable for energy-intensive infrastructure, including advanced computing facilities, supported by the establishment of a new substation where required.
- The site is capable of being appropriately serviced and can accommodate the servicing requirements of future industrial and infrastructure-based development.

- The site is accessed from Mill Road via an existing industrial access arrangement suitable for heavy vehicle movements. The access configuration has been assessed as capable of accommodating construction traffic and ongoing operational requirements associated with the proposed development, consistent with the industrial function of the surrounding road network.
- Wesley Vale has a long-standing association with heavy industry, including the former Wesley Vale Pulp Mill, which operated until 2010. While pulp mill operations have ceased, the locality continues to function as an industrial and infrastructure precinct, with General Industrial and Utilities zoning remaining in place. The surrounding land use pattern, infrastructure provision and planning framework support the establishment of contemporary infrastructure-based development that requires separation from sensitive uses.

The site benefits from:

- an established industrial setting with limited interface with sensitive land uses;
- access to strategic infrastructure networks, including electricity and transport;
- appropriately zoned land under the Tasmanian Planning Scheme – Latrobe; and
- a planning framework that supports industrial and utilities development consistent with long-term land use intent.

It is also noted that the site conditions are suitable to support the scale of the proposed development. Pitt & Sherry have undertaken a geotechnical investigation of the site, which identifies a layered subsurface profile comprising fill overlying weathered dolerite, grading to less weathered and comparatively fresh dolerite at depth. This profile is suitable to support the proposed buildings and associated infrastructure, subject to detailed design and construction practices.

4. Development Summary

The proposed development comprises a contained, infrastructure-led facility establishing utility-scale advanced computing infrastructure within an established industrial setting. The design integrates with existing servicing infrastructure, incorporates substantial on-site utility systems, and manages access, servicing and operational movements within a secure, self-contained layout supported by a shift-based staffing model and on-site occupancy. The information below reflects the layout, scale and operational characteristics of the facility as currently documented (refer to Appendix B – Architectural Drawings, and Figure 3 below):

- Gross floor area / internal accommodation (Total: 3,502 m):
  - Guardhouse: 20 m²
  - Administration: 793 m²
  - Technical (data hall and associated infrastructure): 2,689 m²
- The primary building has a roof height of approximately 8.5 m above ground level. Roof-mounted plant and screening (including the louvred chiller screen) increase the overall maximum height on the site to approximately 15.1 m.

  Other infrastructure elements, including generators, pump rooms, and ancillary structures, are generally located at or below the main building roof height and remain subordinate in scale to the primary building and rooftop plant.
- Car parking and access: A total of 27 car parking spaces are provided, comprising 23 standard spaces, 2 electric vehicle (EV) spaces and 2 accessible spaces, together with provision for 16 bicycle spaces. Parking and internal circulation are wholly contained within the site and are designed to accommodate staff, visitors and periodic service vehicle movements.

The parking provision reflects the operational model of the facility, which involves limited staffing and staggered, shift-based access rather than peak demand periods.

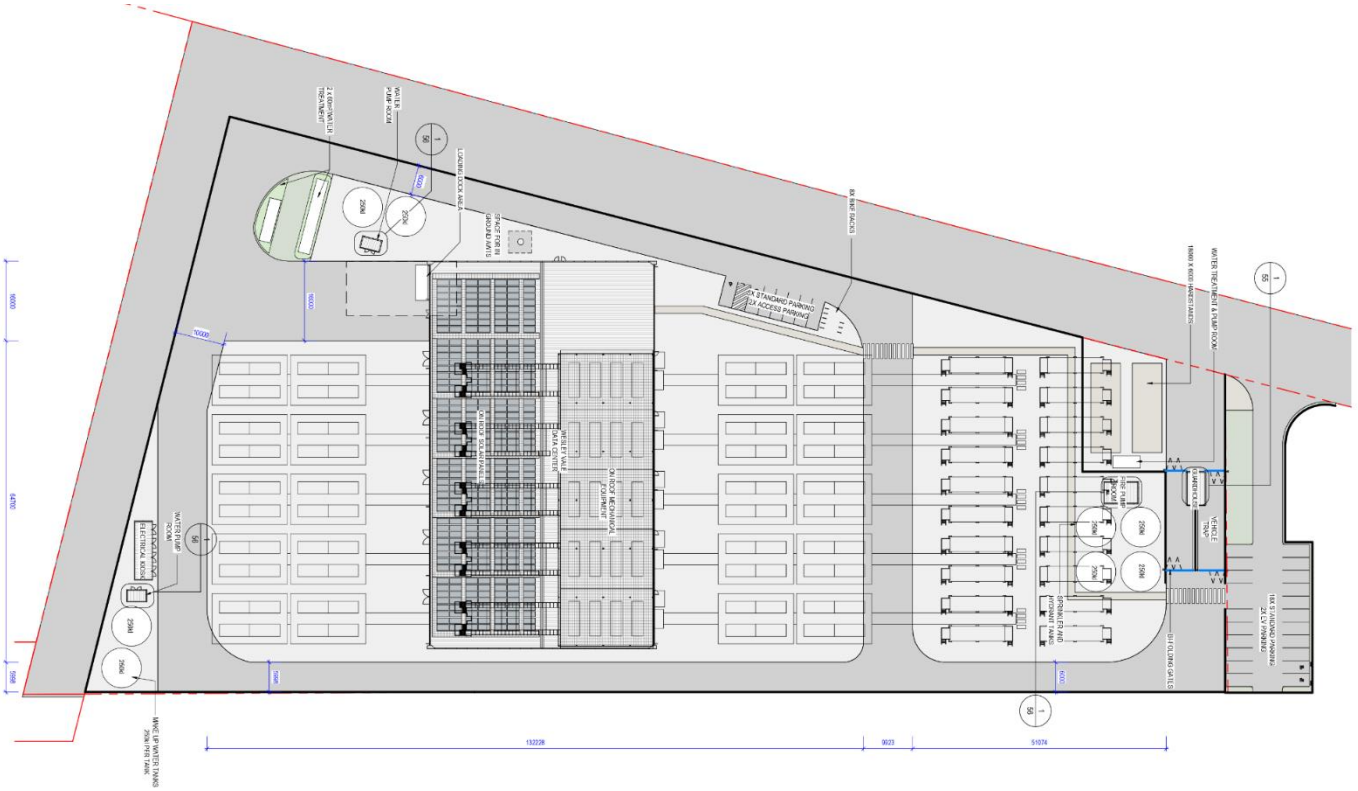


Figure 3: Subject site layout (see Appendix B for details)

Noise Assessment

The noise assessment evaluates the construction and operation of the proposed facility at Wesley Vale, with particular focus on the primary fixed plant and infrastructure components that generate operational noise. The development comprises:

- a principal facility, including a modular data hall building accommodating server and digital processing infrastructure, and a security/guardhouse controlling site access
- cooling infrastructure, including roof-mounted evaporative chillers and external adiabatic air coolers located on adjacent hardstand areas
- standby power infrastructure, including diesel generators and associated battery systems housed within containerised units, which operate only during testing (daytime hours) or infrequent power outage events; and
- associated hardstand areas and plant layouts required to support the operation of cooling and power systems.

These elements represent the primary noise sources assessed in Appendix D, which evaluates both conservative worst-case operating scenarios and typical operating conditions.

Deliveries, servicing and heavy vehicle movements:

Vehicle access is via the existing Access Road extending from Mill Road, which also provides access to the nearby TasNetworks substation. The internal layout includes sealed circulation roads connecting parking areas, the guardhouse, data hall building and servicing areas.

Routine servicing and waste collection vehicles are expected to include an 8.8 m Medium Rigid Vehicle (MRV). A 12.5 m Heavy Rigid Vehicle (HRV) is the largest vehicle expected to access the site through the main entrance. Deliveries and servicing are anticipated to occur during normal business hours and at a relatively low frequency, consistent with the operational characteristics of the facility.

Periodic maintenance activities may require larger vehicles, including an approximately 32 m, 5-axle heavy vehicle and

an approximately 19 m mobile crane. These vehicles will access the site via a temporary access arrangement through the adjoining industrial property and will be subject to temporary traffic management measures as required.

The accompanying Traffic Impact Assessment (Appendix C) confirms that routine service vehicles can safely access, manoeuvre within and exit the site in a forward direction, and that arrangements are available to accommodate larger maintenance vehicles when required.

Utilities and servicing (water supply, wastewater and stormwater)

The servicing strategy includes on-site water storage and treatment systems supporting cooling operations, fire protection infrastructure and staff amenities. The supporting water supply assessment identifies that cooling systems represent the primary water demand for the facility, with substantial on-site storage incorporated to support ongoing operations and manage supply requirements. Current concept infrastructure includes:

- rainwater capture and storage infrastructure, including approximately 1,000 kL of rainwater storage and a small potable water tank (approximately 5 kL), subject to detailed design; and
- dedicated process water storage and distribution infrastructure associated with the cooling system.

Wastewater generated from staff amenities is proposed to be managed through an on-site Aerated Wastewater Treatment System (AWTS), with treated effluent disposed of within a dedicated lined disposal bed or trench system of approximately 60 m². Cooling water pass-through and periodic fire system flushing water are proposed to be directed to the site's stormwater management system due to their limited volume, infrequent occurrence and anticipated water quality. Further detail regarding water demand, cooling water management, wastewater treatment and disposal infrastructure is provided in Appendix E – Wastewater and Appendix F – Water Supply.

Bushfire risk and emergency management

The Bushfire Hazard Management Plan (Appendix G) demonstrates that an appropriate level of protection can be achieved through siting, defendable space, access and asset protection measures. This is supported by the Emergency Management Strategy (Appendix H), which establishes operational procedures and response measures, including the management of hazardous materials, confirming that risk can be maintained within acceptable levels.

Earthworks

Earthworks are required as part of the proposed development to establish building platforms, internal circulation roads, hardstand areas and associated infrastructure, as demonstrated on the proposed site layout (refer Appendix B). The extent of cut and fill is confined to the defined development footprint and is necessary to achieve a functional and level industrial platform capable of accommodating the built form and infrastructure components of the facility. The works are integrated with the overall site design and do not extend into the broader surrounding land, ensuring that landform modification is limited to that required for the efficient operation of the development.

Cut and fill is required to:

- establish building platform
- form internal roads and circulation areas
- construct hardstand areas for plant and servicing infrastructure

Works are:

- contained within the development footprint
- directly associated with built form and infrastructure

No broader regrading of surrounding agricultural land is proposed; earthworks are typical of industrial development of this scale and nature.

Vegetation Clearance

Vegetation clearance will occur within the development footprint to facilitate buildings, infrastructure and internal access. The site is currently characterised by agricultural land use, with vegetation primarily comprising modified ground cover associated with cropping or grazing activities. Based on the available information, the development is not expected to result in the removal of significant native vegetation or vegetation of high ecological value, with clearance largely limited to previously disturbed land. The extent of clearance is therefore consistent with the establishment of an industrial use within an existing agricultural landscape.

Vegetation clearance required within development footprint for:

- building footprint
- infrastructure and plant areas
- internal roads and hardstand

No identified remnant native vegetation or high ecological value vegetation (based on current information) within the development footprint.

5. Tasmanian Planning Scheme - Administration

5.1 Tasmanian Planning Scheme – Latrobe

Unless specifically exempt, all works, development and use on land within Tasmania is subject to the *Land Use Planning and Approvals Act 1993* (the Act). At the time of lodgement of this development application, administration of the Act for this site is the *Tasmanian Planning Scheme – Latrobe* (the Scheme). Pursuant to Part 5 – Operation of the Scheme, provisions within the Scheme set out applicable standards for use and development of a site through the category of use, zoning, codes, and specific area plans with standards that exempt, or set automatic compliance under the acceptable solution, or discretionary compliance subject to being consistent with the relevant performance criteria.

5.1.1 Heritage Listing

The proposed development is not located on a place listed in the Tasmanian Heritage Register as such the *Historic Cultural Heritage Act 1995* does not apply.

5.1.2 Aboriginal Cultural Heritage

Aboriginal cultural heritage is not assessed under the Tasmanian Planning Scheme but remains regulated under the *Aboriginal Heritage Act 1975* (Tas). All Aboriginal heritage is protected under the Act, whether recorded or unrecorded, and due diligence is required for any works involving ground disturbance.

Having regard to this disturbance context and the nature of the proposed works, the overall risk to Aboriginal cultural heritage is considered low. Notwithstanding this, appropriate due diligence will be undertaken, including a search of the Aboriginal Heritage Tasmania register and the implementation of an Unanticipated Discovery Plan to manage any previously unrecorded heritage identified during construction.

On this basis, while Aboriginal cultural heritage is not a matter for assessment under the Planning Scheme, the proposal appropriately recognises and responds to its obligations under the Aboriginal Heritage Act 1975.

5.1.3 Demolition

No demolition is proposed as part of the development. The site does not contain buildings or structures that require removal to facilitate the proposal. The development will involve limited vegetation clearance, generally confined to areas of regrowth that have become established.

While demolition typically relates to the removal of buildings or structures, it is acknowledged that vegetation clearance and minor ground disturbance may still constitute development under the *Land Use Planning and Approvals Act 1993* where relevant planning controls are triggered. In this instance, the extent of vegetation clearance is limited and ancillary to the approved use, and does not, of itself, generate additional assessment requirements beyond those addressed through the applicable overlay codes.

Accordingly, while the proposal constitutes “development” for the purposes of LUPAA, it does not involve demolition and does not introduce any additional planning considerations specific to demolition or vegetation removal.

5.1.4 Exemptions

Part 4 of the Tasmanian Planning Scheme – State Planning Provisions provides for a range of exemptions from the requirement for a planning permit where specified criteria are met. These exemptions typically apply to minor or ancillary works and do not negate the need for a planning permit where other aspects of the development require approval.

The proposed development is the subject of a Development Application; however, certain minor and ancillary components may qualify for exemption where the relevant standards are satisfied. Potentially applicable exemptions include:

- Roof-mounted solar panels, where not affected by heritage controls
- Mechanical plant, including heat pumps and air conditioning units, where located and designed in accordance with the exemption criteria
- Security fencing within the General Industrial Zone, where compliant with the specified height and design standards
- Internal building works
- Temporary buildings and works associated with construction; and
- Minor vegetation management for maintenance and safety purposes.

Where any component of the development does not meet the exemption criteria, it is assessed as part of this application. Accordingly, the exemptions outlined above do not alter the requirement for approval of the development as a whole, but may apply to specific elements where the relevant standards are met.

5.2 Planning Zone(s)

The section of the site subject to this planning application is zoned General Industrial under the *Tasmanian Planning Scheme – Latrobe* (see Figure 4).

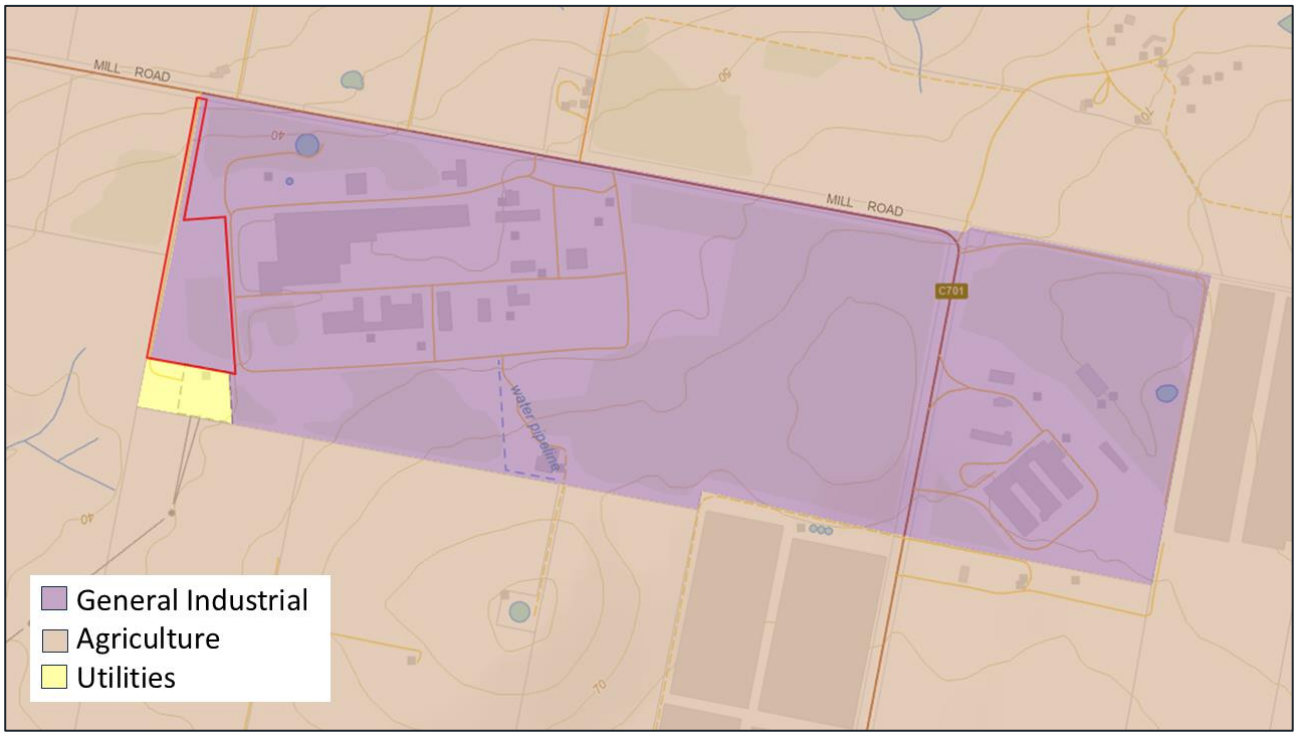


Figure 4: Zoning (General Industrial) – development area outlined in red.

5.3 Land Use Definition

Pursuant to Clause 6.2.1 of the Tasmanian Planning Scheme, each proposed use or development must be categorised into one of the Use Classes listed in Table 6.2. Where a proposed use does not clearly align with a single use class, Clause 6.2.4 requires the use to be categorised into the most similar or best-fit use class. Further, Clause 6.2.3 provides that where a use fits the description of more than one use class, the use class that most specifically describes the use is to apply.

The proposed advanced computing infrastructure (the facility) has been assessed against the Table 6.2 definitions, having regard to its primary purpose, functional operation and dominant characteristics. On that basis, the proposal is properly classified as a *Utilities* use. The development's primary purpose is the provision of digital processing, data storage and data transmission infrastructure for external users, operating as enabling infrastructure within broader digital and communications networks and supported by high-capacity electrical and mechanical systems and continuous computing operations. These characteristics are fundamentally infrastructural in nature and align with the Utilities use class, which encompasses infrastructure of this type.

The proposal does not meet the definition of Research and Development. Research and Development applies where the dominant purpose of the land use is experimentation, testing, innovation or the development of new products or processes. That is not the case here. The proposed facility does not undertake experimental or developmental work as its primary function; rather, it provides production-scale computing capacity and digital services. Any research outcomes enabled by that infrastructure are incidental and do not define the land use.

Nor is the proposal appropriately classified as General Industry. General Industry involves the manufacture, processing or assembly of goods and materials, typically characterised by physical inputs, outputs and production processes. The proposed development involves no material throughput, bulk handling or physical transformation of goods. Its function lies in the provision of infrastructure capacity, rather than industrial production.

Importantly, the Use Table for the General Industrial Zone provides that Utilities is a Permitted use where it is not minor utilities, and that minor utilities are No Permit Required. Accordingly, a Utilities classified facility of this scale is supported in principle within the General Industrial Zone and is appropriately assessed under the Permitted pathway (subject to compliance with all applicable standards and any relevant code triggers).

The Utilities use is consistent with the intent of the General Industrial Zone in a location such as Wesley Vale. The development is located within a long-established industrial precinct, co-located with existing heavy industry, energy infrastructure and utility corridors. It avoids sensitive land uses within the development footprint and makes use of serviced industrial land. In planning terms, the proposal represents a contemporary infrastructure-based industrial activity appropriately located within a zone intended to accommodate uses of this nature.

5.4 Assessment Pathway – Permitted and Discretionary

As set out in Section 5.3, the proposed development is appropriately classified as Utilities under the Tasmanian Planning Scheme. Within the General Industrial Zone, Utilities (other than minor utilities) is identified as a Permitted use (under the zone table). A Permitted use is supported in principle within the zone, subject to compliance with applicable use and development standards. Where a proposal satisfies the relevant Acceptable Solutions, no further discretion is required. However, where reliance is placed on Performance Criteria, or where applicable codes trigger additional assessment matters, the development is subject to discretionary assessment for those elements.

In this instance, while the use is Permitted in the General Industrial Zone, the proposal requires assessment against applicable Codes. Compliance with these provisions involves consideration of performance-based criteria having regard to the site-specific characteristics and technical investigations supporting the application as such the application is discretionary.

While the use is Permitted in the General Industrial Zone, the proposal relies on Performance Criteria under applicable codes. In accordance with Clause 6.8.1(b) of the Tasmanian Planning Scheme, the application is therefore discretionary. The assessment that follows demonstrates that the development can comply with the relevant standards and performance outcomes of the Tasmanian Planning Scheme.

5.5 Applicable Overlays

The site and surrounds are subject to the following Planning Scheme overlays:

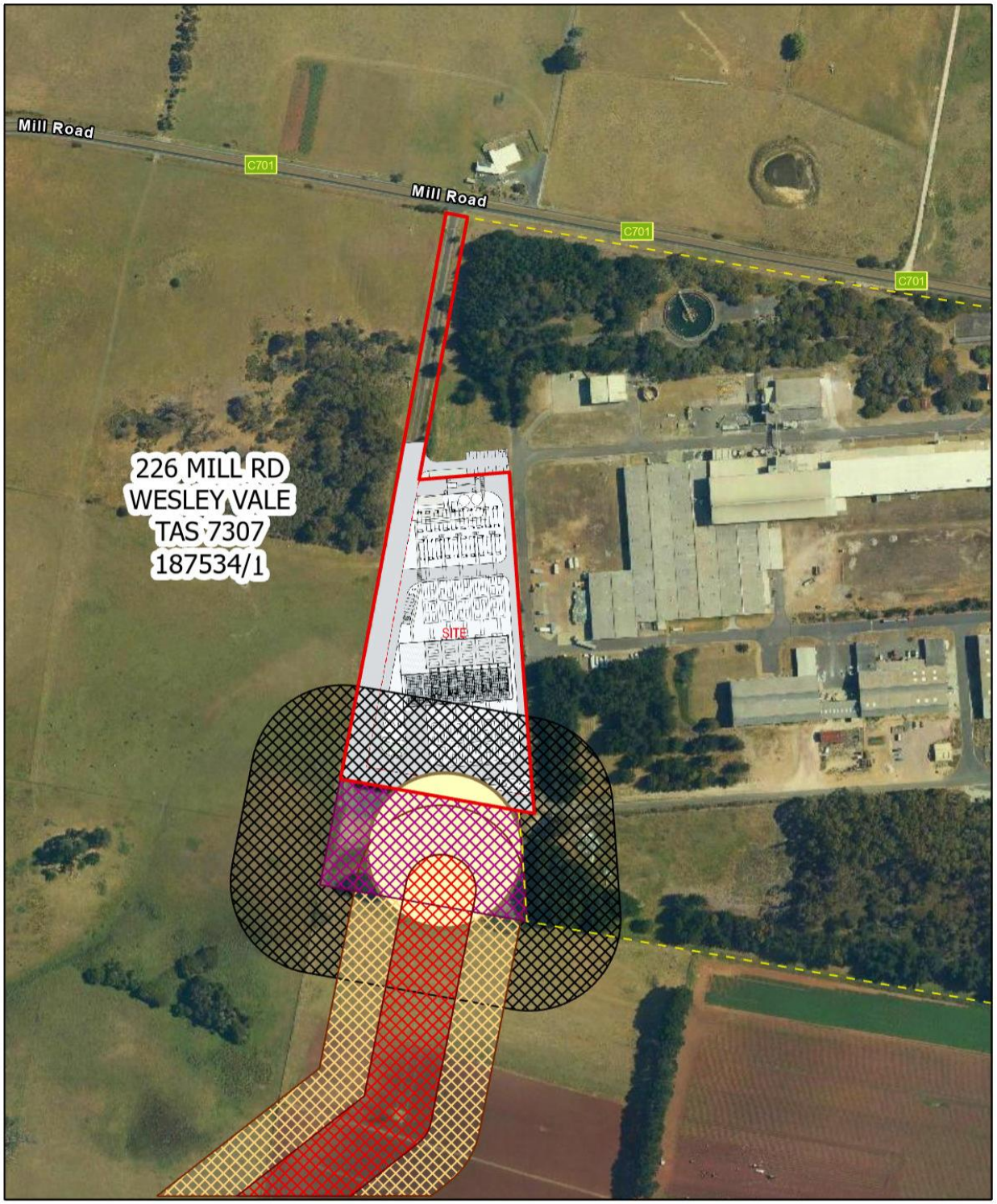
- Low landslip hazard band (see Figure 5)
- Bushfire-prone area – 100% of site
- Airport obstacle limitation area – 100% of site; and
- Communications and substation facility buffer area(s) (see Figure 6).

Note that an overlay may be mapped on the title, but no works may be proposed within the mapped extent.

For the purpose of planning assessment under the LUPAA, overlay codes are only applicable to the extent that use or development is proposed within the mapped overlay area. Notwithstanding this, a broader assessment has been undertaken to inform detailed design and demonstrate that potential indirect impacts are appropriately avoided or managed.



Figure 5: Overlay – Landslip hazard bands (subject site outlined in red)



Firmus - Wesley Vale

Tasmanian Planning Scheme Zone Overlays - Electricity Infrastructure

pitt&sherry

N

0 50 100
Metres

Scale: 1:3,500 @A4

Coordinate System: GDA2020 MGA Zone 55

MAP REF: P.25.1474
AUTHOR: HF
REV: A
DATE: 25/05/2026
DATA SOURCES: Aerial imagery from ESRI, Data from LISTmap, Department of Natural Resources and Environment, Tas Gov Project Specific Data

LEGEND

- Cadastral Parcels
- Property Boundary
- Substation facility buffer area
- Communications station buffer area
- Electricity transmission corridor
- Substation facility
- Inner protection area

Figure 6: Overlay – Electricity Transmission Infrastructure Protection (subject site outlined in red)

5.6 Local Provisions Schedule – Latrobe (LAT)

5.6.1 LAT – Local Area Objectives

The Latrobe Local Provisions Schedule does not include Local Area Objectives. Accordingly, there are no Local Area Objectives applicable to the site.

5.6.2 LAT – Particular Purpose Zones

There are no Particular Purpose Zones applying to the subject land.

5.6.3 LAT – Specific Area Plans

There are no Specific Area Plans applying to the subject land.

5.6.4 LAT – Site Specific Qualifications

There are no Site-specific Qualifications applying to the subject land.

5.6.5 LAT – Code List

The Latrobe Local Provisions Schedule includes the following codes:

- LAT-C3.0 Road and Railway Assets Code – N/A
- LAT-C6.0 Local Historic Heritage Code- N/A
- LAT-C8.0 Scenic Protection Code – N/A; and
- LAT-C11.0 Coastal Inundation Hazard Code – N/A.

5.7 Applicable Codes

Within the Planning Scheme, there are a number of codes which relate to the proposed use and development or are called up by the applicable overlays. Only those that may have some application to the proposal are considered. These are addressed in this section, and comments are provided where applicable:

Code	Status	Comment
C8.0 Signs Code	Not Applicable	No signage is proposed as part of the current application. As there is no use or development involving signs, the provisions of the Code are not triggered. Any future signage would be subject to separate assessment and, where required, a standalone application.
C2.0 Parking and Sustainable Transport Code	Applicable	The Code applies to the proposed development. Parking supply, access and operational demand have been assessed having regard to the characteristics of the Utilities use and the industrial context. Compliance is addressed in Section 7.1 and supported by the Traffic Impact Assessment (Appendix C).
C3.0 Road and Railway Assets Code	Applicable	The Code applies to the proposed development. Access is via existing road infrastructure within an established industrial precinct, and the

Code	Status	Comment
		proposal has been assessed to ensure it will not adversely affect the safety, function or operation of the road network. Compliance is addressed in Section 7.2 and supported by the Traffic Impact Assessment (Appendix C).
C4.0 Electricity Transmission Infrastructure Protection Code	Applicable	The Code applies to land containing or adjoining electricity transmission infrastructure. Compliance is addressed in Section 7.3.
C24.0 Telecommunications Code	Not Applicable	The proposed development does not constitute telecommunications infrastructure as defined by the Code. While classified as Utilities, the facility does not involve telecommunications infrastructure regulated under this Code.
C9.0 Local Historic Heritage Code	Not Applicable	The site is not listed as a Local Heritage Place, is not within a Heritage Precinct, and is not identified as an area of archaeological potential. The proposal does not affect heritage values.
C7.0 Natural Assets Code	Not applicable	The Natural Assets Code (C7.0) is not applicable to the proposal as the land is not mapped within a Priority Vegetation Area overlay or a Waterway and Coastal Protection Area overlay, nor is it affected by any other overlay administered under the Natural Assets Code. As a result, the triggers for assessment under C7.0 are not present.
C6.0 Scenic Protection Code	Not Applicable	The site is not located within a Scenic Protection Area or Scenic Road Corridor. Accordingly, the Code does not apply.
C14.0 Attenuation Code	Not Applicable	The Code applies to prescribed noise-generating uses requiring attenuation distances. The Noise Assessment (Appendix D) demonstrates that the proposal does not trigger attenuation distance requirements.
C10.0 Coastal Erosion Hazard Code	Not Applicable	The site is not mapped within a coastal erosion hazard area. Accordingly, the Code does not apply.
C11.0 Coastal Inundation Hazard Code	Not Applicable	The site is not mapped within a coastal inundation hazard area. Accordingly, the Code does not apply.
C12.0 Flood-Prone Areas Hazard Code	Not Applicable	The site is not mapped as flood-prone. Accordingly, the Code does not apply.
C13.0 Bushfire-Prone Areas Code	Applicable	The Code applies to the proposed development. The Bushfire Hazard Management Plan (Appendix G) and Emergency Management Strategy (Appendix H) demonstrate that bushfire risk can be managed to an acceptable level through siting, asset protection, access and operational controls. Compliance is addressed in Section 7.4.

Code	Status	Comment
C17.0 Potentially Contaminated Land Code	Not Applicable	The Code applies where land is identified as contaminated or where a sensitive use is proposed. The proposed Utilities use is not sensitive, and no contamination requiring assessment has been identified.
C15.0 Landslip Hazard Code	Applicable	The Code applies as portions of the title are mapped as Low Landslip Hazard. However, no works are proposed within the mapped hazard area, with all development contained on the existing engineered platform outside the hazard extent. Accordingly, no assessment is required.
C16.0 Safeguarding of Airports Code	Applicable – Exempt	Clause C16.4.1 provides an exemption where development does not penetrate the applicable Obstacle Limitation Surface (55.5m). The proposed buildings are well below the relevant height threshold and do not penetrate the surface. The development is therefore exempt from further assessment under this Code.

6. Tasmanian Planning Scheme – Zone Standards

The proposed works located within the General Industrial Zone are shown in the proposed plans at Appendix B. A planning assessment is provided below to demonstrate compliance with the zone's purpose and applicable standards.

6.1 Zone Purpose

The assessment below demonstrates that the proposal is consistent with the purpose of the zone.

Purpose Statement	Assessment
19.1.1 To provide for manufacturing, processing, repair, storage and distribution of goods and materials where there may be impacts on adjacent uses.	The proposed facility is consistent with the intent of Clause 19.1.1 as it represents a utility-scale industrial use appropriately located within the established Wesley Vale industrial precinct, where infrastructure-based activities and associated operational impacts are anticipated and managed. While the proposal does not involve traditional manufacturing or material processing, it performs an equivalent industrial function through large-scale digital processing and data handling, supported by substantial electrical, mechanical and cooling infrastructure. The development comprises industrial-scale buildings, plant and services, and operates continuously in a manner comparable to other infrastructure-intensive uses typically located within the General Industrial Zone. The site forms part of the Wesley Vale industrial node, characterised by energy infrastructure, utility corridors and established industrial uses, set within a broader agricultural landscape. The zone purpose anticipates uses that may generate off-site impacts that would be inappropriate in more sensitive environments. In this context, the proposed development is appropriately located, inwardly focused and does not introduce sensitive uses or land use conflict. Accordingly, the proposal is consistent with Clause 19.1.1.
19.1.2 To provide for use or development that supports and does not adversely impact on industrial activity.	The proposed development supports the ongoing function and evolution of industrial activity within the Wesley Vale precinct by introducing contemporary infrastructure-based industry that is reliant on, and makes efficient use of, existing high-capacity utilities, including electricity supply, transport access and servicing infrastructure. The proposal is operationally self-contained and will not displace, constrain or undermine existing or future industrial uses. It does not introduce sensitive uses, generates limited on-

	site workforce activity, and is designed to avoid adverse impacts on surrounding industrial operations. The scale, form and servicing requirements are consistent with the expectations of development within the General Industrial Zone. In addition, the surrounding agricultural land provides separation to more sensitive receivers, and the nature of the use (being predominantly plant and infrastructure-based rather than people-intensive (further reduces the potential for reverse sensitivity or land use conflict. Accordingly, the proposal supports and is compatible with the established and planned industrial function of the locality and is consistent with Clause 19.1.2.

6.2 Zone Use Standards

The following standards are not applicable:

- 19.3.1 Discretionary uses

The following standards apply:

- There are no other standards.

6.3 Development Standards for Buildings & Works

The following standards are not applicable:

- Clause 19.4.3 Landscaping is not considered to generate substantive assessment requirements in this instance. The development does not present to a primary public frontage and is located within an established industrial area with existing frontage landscaping for visual amenity (mature) which us not being removed).

- The following standards apply:

19.4.1 Building height	
Objective: To provide for a building height that: (a) is necessary for the operation of the use; and (b) minimises adverse impacts on adjoining properties.	
Acceptable Solution	**Performance Criteria**
A1 Building height must not be more than 20m.	P1 Building height must be necessary for the operation of the use and not cause an unreasonable impact on adjoining properties, having regard to: (a) the bulk and form of the building; (b) separation from existing use on adjoining properties; and (c) any buffers created by natural or other features.
Assessment The development presents as a low-profile industrial building with a primary roof height of approximately 8.5 metres, with rooftop plant increasing the maximum height to approximately 15.075 metres, as detailed in Appendix B.	

Roof-based mechanical plant, including evaporative chillers and associated infrastructure, is located above the data hall buildings and forms an integral component of the facility. While this plant extends above the roof level, the combined height of buildings and associated servicing infrastructure remains well below the 20-metre height limit applicable within the General Industrial Zone.

Visual impact sheets and elevations provided (see Appendix B).

Accordingly, the development satisfies Clause 19.4.1 A1.

19.4.2 Setbacks	
Objective: That the building setback is appropriate for the site.	
Acceptable Solution	**Performance Criteria**
A1 Buildings must have setback from a frontage of: (a) not less than 10m; (b) not less than existing buildings on the site; or (c) not more or less than the maximum and minimum setbacks of the buildings on adjoining properties.	P1 Buildings must have a setback from a frontage that provides adequate space for vehicle access, parking and landscaping, having regard to: (a) the topography of the site; (b) the setback of buildings on adjacent properties; and (c) the safety of road users.

Assessment

The development is located within a larger industrial landholding accommodating multiple established operations and does not function as a conventional standalone frontage development. The relevant frontage is limited to the interface with the portion of the parent title connecting to the external road network. In respect of Acceptable Solution A1:

(a) A setback of not less than 10 metres is provided to the road frontage, as demonstrated on the development drawings (Appendix B). This satisfies the minimum setback requirement.

(b) The setback is consistent with the siting of existing buildings and infrastructure across the parent site and does not reduce the setback relative to established development. Accordingly, the proposal satisfies this limb.

(c) The setback is consistent with the prevailing pattern of development within the Wesley Vale industrial area, where setbacks respond to site topography, infrastructure layout and operational requirements. The proposed setback does not result in a built form that is materially closer to, or further from, the frontage than the range evident in the surrounding industrial context. This satisfies this limb.

The remaining site boundaries are internal to the broader industrial landholding and adjoin existing industrial development and infrastructure. These do not represent frontage conditions contemplated by Clause 19.4.2, and the frontage setback provisions are not directly applicable to these interfaces.

Given the established industrial context, the internalised layout of the proposal, and the absence of sensitive adjoining uses, the setback provides appropriate separation, supports safe vehicle access and circulation, and will not result in unreasonable visual or amenity impacts. Accordingly, the development complies with Acceptable Solution A1, and it is not necessary to rely on Performance Criterion P1.

6.4 Development Standards for Subdivision

No subdivision proposed as such; there are no assessable provisions.

7. Tasmanian Planning Scheme – Code Requirements

For matters that transcend specific zones the Planning Scheme addresses these via a Code, either in the form of a development code such as car parking or a mapped overlay for significant native vegetation, flooding or similar environmental value. Whilst there are several codes that apply to the property, the extent to which they apply to a specific development application will vary according to the final design and the intensity or type of use.

7.1 Parking & Sustainable Transport Code – C2.0

7.1.1 Development Exempt from this Code

No Development is exempt from this code.

7.1.2 Development Standards for Buildings and Works

The following standards do not apply:

- C2.5.5 Number of car parking spaces within the General Residential Zone and Inner Residential Zone, as the site is not located within either zone;
- C2.6.3 Number of accesses for vehicles (A2/P2) does not apply, as the site is not located on a pedestrian priority street or in a context where these provisions are triggered. Assessment is therefore undertaken against Acceptable Solution A1 only.
- C2.6.4 Lighting of parking areas within the General Business Zone and Central Business Zone, as the site is not located within either zone;
- C2.6.7 Bicycle parking and storage facilities within the General Business Zone and Central Business Zone, as the site is not located within either zone;
- C2.6.8 Siting of parking and turning areas, as the site is not located within the Inner Residential Zone, Village Zone, Urban Mixed Use Zone, Local Business Zone, General Business Zone or Central Business Zone;
- C2.7.1 Parking precinct plan, as no parking precinct plan applies to the site.

The following standards apply:

C2.5.1 Car Parking Numbers	
Objective: That an appropriate level of car parking spaces are provided to meet the needs of the use.	
Acceptable Solutions	**Performance Criteria**
A1 The number of on-site car parking spaces must be no less than the number specified in Table C2.1, excluding if: (a) the site is subject to a parking plan for the area adopted by council, in which case parking provision (spaces or cash-in-lieu) must be in accordance with that plan;	P1.1 The number of on-site car parking spaces for uses, excluding dwellings, must meet the reasonable needs of the use, having regard to: (a) the availability of off-street public car parking spaces within reasonable walking distance of the site; (b) the ability of multiple users to share spaces because of: (i) variations in car parking demand over time; or

(b) the site is contained within a parking precinct plan and subject to Clause C2.7; (c) the site is subject to Clause C2.5.5; or (d) it relates to an intensification of an existing use or development or a change of use where: (i) the number of on-site car parking spaces for the existing use or development specified in Table C2.1 is greater than the number of car parking spaces specified in Table C2.1 for the proposed use or development, in which case no additional on-site car parking is required; or (ii) the number of on-site car parking spaces for the existing use or development specified in Table C2.1 is less than the number of car parking spaces specified in Table C2.1 for the proposed use or development, in which case on-site car parking must be calculated as follows: N = A + (C- B) N = Number of on-site car parking spaces required A = Number of existing on site car parking spaces B = Number of on-site car parking spaces required for the existing use or development specified in Table C2.1 C= Number of on-site car parking spaces required for the proposed use or development specified in Table C2.1.	(ii) efficiencies gained by consolidation of car parking spaces; (c) the availability and frequency of public transport within reasonable walking distance of the site; (d) the availability and frequency of other transport alternatives; (e) any site constraints such as existing buildings, slope, drainage, vegetation and landscaping; (f) the availability, accessibility and safety of on street parking, having regard to the nature of the roads, traffic management and other uses in the vicinity; (g) the effect on streetscape; and (h) any assessment by a suitably qualified person of the actual car parking demand determined having regard to the scale and nature of the use and development. P1.2 The number of car parking spaces for dwellings must meet the reasonable needs of the use, having regard to: (a) the nature and intensity of the use and car parking required; (b) the size of the dwelling and the number of bedrooms; and (c) the pattern of parking in the surrounding area.

Assessment

Acceptable Solution A1 requires that the number of on-site car parking spaces must be no less than the number specified in Table C2.1.

The proposed development is classified as a Utilities use, for which no specific car parking rate is prescribed within Table C2.1 of the Planning Scheme. Accordingly, Acceptable Solution A1 does not establish a minimum numerical parking requirement for this use.

Clauses (a)–(d) do not apply as:

- the site is not subject to a parking plan adopted by Council
- the site is not within a parking precinct plan
- the site is not subject to Clause C2.5.5; and
- the proposal does not involve intensification of an existing use.

In the absence of a specified rate under Table C2.1, the proposal is not required to demonstrate compliance with a minimum parking provision under A1.

Notwithstanding this, the development provides a total of 27 on-site car parking spaces, distributed across the office, workshop and site parking areas, which is sufficient to accommodate the operational demand of the facility.

As no minimum parking requirement is specified for the Utilities use under Table C2.1, the proposal does not conflict with Acceptable Solution A1.

Accordingly, the proposal is considered to comply with Acceptable Solution A1.

C2.5.2 Bicycle parking numbers	
Objective: That an appropriate level of bicycle parking spaces are provided to meet the needs of the use.	
Acceptable Solutions	**Performance Criteria**
A1 Bicycle parking spaces must: (a) be provided on the site or within 50m of the site; and (b) be no less than the number specified in Table C2.1.	P1 Bicycle parking spaces must be provided to meet the reasonable needs of the use, having regard to: (a) the likely number of users of the site and their opportunities and likely need to travel by bicycle; and (b) the availability and accessibility of existing and any planned parking facilities for bicycles in the surrounding area.
Assessment Table C2.1 does not specify bicycle parking requirements for the Utilities use class. Bicycle parking is not required under the Acceptable Solution. Notwithstanding this, provision is made within the development for bicycle parking facilities. Accordingly, the proposal complies with Acceptable Solution A1.	

C2.5.3 Motorcycle parking numbers	
Objective: That the appropriate level of motorcycle parking is provided to meet the needs of the use.	
Acceptable Solutions	**Performance Criteria**
A1 The number of on-site motorcycle parking spaces for all uses must: (a) be no less than the number specified in Table C2.4; and (b) if an existing use or development is extended or intensified, the number of on-site motorcycle parking spaces must be based on the proposed extension or intensification, provided the existing number of motorcycle parking spaces is maintained.	P1 Motorcycle parking spaces for all uses must be provided to meet the reasonable needs of the use, having regard to: (a) the nature of the proposed use and development; (b) the topography of the site; (c) the location of existing buildings on the site; (d) any constraints imposed by existing development; and (e) the availability and accessibility of motorcycle parking spaces on the street or in the surrounding area.
Assessment Motorcycle parking is only required where specified in Table C2.4. No specific requirement is triggered for the Utilities use. The proposal satisfies Acceptable Solution A1.	

C2.5.4 Loading bays
Objective: That adequate access for goods delivery and collection is provided, and to avoid unreasonable loss of amenity and adverse impacts on traffic flows.

Acceptable Solutions	Performance Criteria
A1 A loading bay must be provided for uses with a floor area of more than 1000m² in a single occupancy.	P1 Adequate space for loading and unloading of vehicles must be provided, having regard to: (a) the type of vehicles associated with the use; (b) the nature of the use; (c) the frequency of loading and unloading; (d) the location of the site; (e) the nature of traffic in the surrounding area; (f) the area and dimensions of the site; and (g) the topography of the site; (h) the location of existing buildings on the site; and (i) any constraints imposed by existing development.

Assessment

Applicable where floor area exceeds 1000m². A formal loading bay is not specifically provided; however, adequate space for loading and unloading is incorporated within the internal road and hardstand network.

Adequate space for loading and unloading of vehicles must be provided, having regard to:

(a) The development will be serviced by Medium Rigid Vehicles (MRVs) (approximately 8.8m in length) for routine servicing and waste collection. Larger vehicles, including articulated heavy vehicles and mobile cranes, may access the site on an infrequent basis for construction, maintenance and equipment replacement, as identified in the Traffic Impact Assessment (TIA).

(b) The use comprises utility-scale advanced computing infrastructure, which is not reliant on regular freight movement. Operational activities are characterised by low-frequency servicing requirements relative to typical industrial or warehousing uses.

(c) As confirmed in the TIA, vehicle movements associated with servicing, deliveries and waste collection are low in frequency and do not generate sustained loading demand requiring dedicated dock facilities.

(d) The site is located within an established industrial precinct at Wesley Vale. Access is provided via the existing Access Road connecting to Mill Road, which in turn connects to Pardoe Road and Port Sorell Road. Port Sorell Road provides access to the Bass Highway and broader regional transport network.

(e) The surrounding road network is routinely used by heavy vehicles servicing existing industrial land uses, and the nature and scale of vehicle movements generated by the proposal are consistent with this established traffic environment.

(f) The site is of substantial size and has been designed with wide internal access roads and extensive hardstand areas, enabling all relevant design vehicles to access loading areas and manoeuvre safely within the site.

(g) The site is generally flat and unconstrained, supporting efficient vehicle access, circulation and loading/unloading activities.

(h) The development layout allows vehicles to circulate in a forward direction and access areas adjacent to buildings for servicing, without reliance on constrained or designated loading docks.

(i) Swept path analysis provided within the TIA confirms that all relevant vehicles, including articulated vehicles and mobile cranes, can safely enter, manoeuvre within, and exit the site in a forward direction.

While formalised loading bays are not proposed, the scale, layout and design of the site provide sufficient, safe and

functional space for all anticipated loading and unloading activities associated with the development.

The proposal satisfies Performance Criteria P1, as adequate space is provided on-site for the safe and efficient loading and unloading of vehicles, having regard to the nature, scale and frequency of servicing activity, and consistent with the findings of the Traffic Impact Assessment.

C2.6.1 Construction of parking areas	
Objective: That parking areas are constructed to an appropriate standard.	
Acceptable Solutions	**Performance Criteria**
A1 All parking, access ways, manoeuvring and circulation spaces must: (a) be constructed with a durable all weather pavement; (b) be drained to the public stormwater system, or contain stormwater on the site; and (c) excluding all uses in the Rural Zone, Agriculture Zone, Landscape Conservation Zone, Environmental Management Zone, Recreation Zone and Open Space Zone, be surfaced by a spray seal, asphalt, concrete, pavers or equivalent material to restrict abrasion from traffic and minimise entry of water to the pavement.	P1 All parking, access ways, manoeuvring and circulation spaces must be readily identifiable and constructed so that they are useable in all weather conditions, having regard to: (a) the nature of the use; (b) the topography of the land; (c) the drainage system available; (d) the likelihood of transporting sediment or debris from the site onto a road or public place; (e) the likelihood of generating dust; and (f) the nature of the proposed surfacing.

Assessment

The proposal satisfies the Acceptable Solution A1, as follows:

(a) All parking areas, access ways, manoeuvring and circulation spaces will be constructed with a durable all-weather pavement. This includes sealed surfaces suitable for industrial use, ensuring year-round functionality and minimising maintenance requirements.

(b) Stormwater from all hardstand areas will be managed on-site through a combination of sealed surfaces, vegetated swales, and detention systems. The drainage design ensures that stormwater is either contained on-site or directed to appropriate discharge points, consistent with the stormwater management strategy outlined in Appendix E (and Appendix E) of the planning report.

(c) The site is not located within the Rural Zone, Agriculture Zone, Landscape Conservation Zone, Environmental Management Zone, Recreation Zone or Open Space Zone. As such, all relevant surfaces will be finished with asphalt, concrete, or equivalent materials to restrict abrasion from traffic and minimise water ingress into the pavement structure.

Accordingly, the proposal complies with Clause C2.6.1 A1.

C2.6.2 Design and layout of parking areas	
Objective: That parking areas are designed and laid out to provide convenient, safe and efficient parking.	
Acceptable Solutions	**Performance Criteria**
A1.1 Parking, access ways, manoeuvring and circulation spaces must either: (a) comply with the following: (i) have a gradient in accordance with Australian Standard AS 2890 - Parking facilities, Parts 1-6; (ii) provide for vehicles to enter and exit the site in a forward direction where providing for more than 4 parking spaces; (iii) have an access width not less than the requirements in Table C2.2; (iv) have car parking space dimensions which satisfy the requirements in Table C2.3; (v) have a combined access and manoeuvring width adjacent to parking spaces not less than the requirements in Table C2.3 where there are 3 or more car parking spaces; (vi) have a vertical clearance of not less than 2.1m above the parking surface level; and (vii) excluding a single dwelling, be delineated by line marking or other clear physical means; or (b) comply with Australian Standard AS 2890- Parking facilities, Parts 1-6. A1.2 Parking spaces provided for use by persons with a disability must satisfy the following: (a) be located as close as practicable to the main entry point to the building; (b) be incorporated into the overall car park design; and (c) be designed and constructed in accordance with Australian/New Zealand Standard AS/NZS 2890.6:2009 Parking facilities, Off-street parking for people with disabilities.[1]	P1 All parking, access ways, manoeuvring and circulation spaces must be designed and readily identifiable to provide convenient, safe and efficient parking, having regard to: (a) the characteristics of the site; (b) the proposed slope, dimensions and layout; (c) useability in all weather conditions; (d) vehicle and pedestrian traffic safety; (e) the nature and use of the development; (f) the expected number and type of vehicles; (g) the likely use of the parking areas by persons with a disability; (h) the nature of traffic in the surrounding area; (i) the proposed means of parking delineation; and (j) the provisions of Australian Standard AS 2890.1:2004 Parking facilities, Part 1: Off-street car parking and AS 2890.2 -2002 Parking facilities, Part 2: Offstreet commercial vehicle facilities.
Assessment The proposal satisfies Acceptable Solution A1.1 by meeting both (a) and (b), as follows: The design complies with all of the following: (a)(i) The gradient of all parking areas, access ways and circulation spaces complies *with Australian Standard AS 2890 – Parking Facilities, Parts 1–6.* The site is relatively flat, and no excessive gradients are proposed. (a)(ii) The layout provides for all vehicles to enter and exit the site in a forward direction, as more than four parking spaces are proposed. (a)(iii) The access width meets or exceeds the minimum requirements specified in Table C2.2, ensuring safe and	

efficient entry and exit.

(a)(iv) All car parking spaces comply with the dimensional requirements of Table C2.3, including bay size and aisle width.

(a)(v) The combined access and manoeuvring widths adjacent to parking spaces meet the minimums required under Table C2.3, supporting safe vehicle movement.

(a)(vi) A vertical clearance of not less than 2.1 metres is provided above all parking surfaces.

(a)(vii) All parking spaces will be clearly delineated by line marking or other physical means, ensuring visibility and ease of use.

(b) The design also complies with the relevant provisions *of Australian Standard AS 2890 – Parking Facilities, Parts 1–6*, as confirmed in the Traffic Impact Assessment (Appendix C).

The proposal satisfies Acceptable Solution A1.2.

Although there is no prescribed requirement for accessible parking spaces under the Parking and Sustainable Transport Code for the Utilities use class, the development provides two (2) accessible parking spaces. These spaces are located in proximity to the main building entrance, are integrated within the overall car park design, and will be designed and constructed in accordance with AS/NZS 2890.6:2009. Provision is also made for electric vehicle charging infrastructure and bicycle parking facilities.

Please note that several spaces will be provide for EV charging (although this is not a current planning requirement).

C2.6.3 Number of accesses for vehicles

Objective:

That:

(a) access to land is provided which is safe and efficient for users of the land and all road network users, including but not limited to drivers, passengers, pedestrians and cyclists by minimising the number of vehicle accesses;

(b) accesses do not cause an unreasonable loss of amenity of adjoining uses; and

(c) the number of accesses minimise impacts on the streetscape.

Acceptable Solutions	**Performance Criteria**
A1 The number of accesses provided for each frontage must: (a) be no more than 1; or (b) no more than the existing number of accesses, whichever is the greater.	P1 The number of accesses for each frontage must be minimised, having regard to: (a) any loss of on-street parking; and (b) pedestrian safety and amenity; (c) traffic safety; (d) residential amenity on adjoining land; and (e) the impact on the streetscape.

Assessment

The proposal satisfies the Acceptable Solution A1, as follows: No additional access points are proposed, with the site to continue operating via the single existing access.

Accordingly, the proposal complies with Clause C2.6.3 A1.

C2.6.5 Pedestrian access	
Objective: That pedestrian access within parking areas is provided in a safe and convenient manner.	
Acceptable Solutions	**Performance Criteria**
A1.1 Uses that require 10 or more car parking spaces must: (a) have a 1m wide footpath that is separated from the access ways or parking aisles, excluding where crossing access ways or parking aisles, by: (i) a horizontal distance of 2.5m between the edge of the footpath and the access way or parking aisle; or (ii) protective devices such as bollards, guard rails or planters between the footpath and the access way or parking aisle; and (b) be signed and line marked at points where pedestrians cross access ways or parking aisles. A1.2 In parking areas containing accessible car parking spaces for use by persons with a disability, a footpath having a width not less than 1.5m and a gradient not steeper than 1 in 14 is required from those spaces to the main entry point to the building.	P1 Safe and convenient pedestrian access must be provided within parking areas, having regard to: (a) the characteristics of the site; (b) the nature of the use; (c) the number of parking spaces; (d) the frequency of vehicle movements; (e) the needs of persons with a disability; (f) the location and number of footpath crossings; (g) vehicle and pedestrian traffic safety; (h) the location of any access ways or parking aisles; and (i) any protective devices proposed for pedestrian safety.

Assessment

The proposal is unable to comply with A1.1 as such a performance-based solution is required.

Safe and convenient pedestrian access is provided within the site, having regard to the following:

(a) The development incorporates multiple parking areas, including the office, workshop and site parking areas (east and west). Pedestrian access is integrated within the overall layout, enabling safe movement between parking areas and buildings.

(b) Access to the site is controlled via a guardhouse, with visitor access limited to the office car park. This arrangement ensures predictable vehicle movements and reduces the potential for conflict between pedestrians and vehicles.

(c) Parking is distributed across the site, reducing the concentration of vehicle movements in any single location and supporting safer pedestrian conditions.

(d) As identified in the Traffic Impact Assessment, peak vehicle movements occur during shift changes and are accommodated within the internal road and circulation network without creating conflicts with pedestrian movement.

(e) Accessible parking is provided within the office car park, including DDA-compliant spaces located in proximity to the main office building, with appropriate pedestrian connections.

(f) The office car park incorporates dedicated pedestrian footpaths and defined crossing points connecting to the main building and surrounding facilities. Pedestrian connectivity is reinforced by footpaths around the building perimeter.

(g) Pedestrian pathways and crossing points are clearly delineated and separated from vehicle circulation areas in key

locations, providing a legible and safe internal pedestrian network.

(h) Internal roads and parking aisles are designed with appropriate dimensions for two-way vehicle movement, reducing the likelihood of conflict with pedestrians.

(i) Overall, pedestrian safety is achieved through the combination of defined pathways, controlled access arrangements, and the separation of pedestrian and vehicle movements within critical areas of the site.

The design and layout of the site provide safe and convenient pedestrian access in accordance with the operational characteristics of the use.

Accordingly, the proposal satisfies Performance Criteria P1.

C2.6.6 Loading Bays

Objective: That the area and dimensions of loading bays are adequate to provide safe and efficient delivery and collection of goods.

Acceptable Solutions	**Performance Criteria**
A1 The area and dimensions of loading bays and access way areas must be designed in accordance with *Australian Standard AS 2890.2–2002, Parking facilities, Part 2: Off-street commercial vehicle facilities*, for the type of vehicles likely to use the site.	P1 Loading bays must have an area and dimensions suitable for the use, having regard to: (a) the types of vehicles likely to use the site; (b) the nature of the use; (c) the frequency of loading and unloading; (d) the area and dimensions of the site; (e) the topography of the site; (f) the location of existing buildings on the site; and (g) any constraints imposed by existing development.

Assessment

The proposal satisfies Acceptable Solution A2.

The Traffic Impact Assessment includes swept-path analysis demonstrating that the commercial vehicles likely to use the development, including the 8.8 m Medium Rigid Vehicle (MRV) and 12.5 m Heavy Rigid Vehicle (HRV), can safely enter, manoeuvre within and exit the site in a forward direction.

The analysis also demonstrates that larger infrequent maintenance vehicles can be accommodated using the temporary access arrangement through adjoining industrial land, subject to temporary traffic management measures where required.

A2 The type of commercial vehicles likely to use the site must be able to enter, park and exit the site in a forward direction in accordance with *Australian Standard AS 2890.2 – 2002, Parking Facilities, Part 2: Parking facilities - Off-street commercial vehicle facilities*.	P2 Access for commercial vehicles to and from the site must be safe, having regard to: (a) the types of vehicles associated with the use; (b) the nature of the use; (c) the frequency of loading and unloading; (d) the area and dimensions of the site; (e) the location of the site and nature of traffic in the area of the site; (f) the effectiveness or efficiency of the surrounding road

	network; and (g) site constraints such as existing buildings, slope, drainage, vegetation, parking and landscaping.
Assessment The proposal satisfies Acceptable Solution A2, as follows: The loading bay and access areas have been designed in accordance with *Australian Standard AS 2890.2–2002: Parking Facilities, Part 2 – Off-street Commercial Vehicle Facilities*, ensuring compliance with Clause C2.6.6 A2 of the Planning Scheme. On this basis, the proposal satisfies the requirements of Clause C2.6.6 A2.	

7.2 Road & Railway Assets Code – C3.0

7.2.1 Development Exempt from this Code

The Development is not exempt from this Code.

7.2.2 Use Standards

The following use standard(s) apply:

C3.5.1 Traffic generation at a vehicle crossing, level crossing or new junction	
Objective: To minimise any adverse effects on the safety and efficiency of the road or rail network from vehicular traffic generated from the site at an existing or new vehicle crossing or level crossing or new junction.	
Acceptable Solutions	**Performance Criteria**
A1.1 For a category 1 road or a limited access road, vehicular traffic to and from the site will not require: (a) a new junction; (b) a new vehicle crossing; or (c) a new level crossing. A1.2 For a road, excluding a category 1 road or a limited access road, written consent for a new junction, vehicle crossing, or level crossing to serve the use and development has been issued by the road authority. A1.3 For the rail network, written consent for a new private level crossing to serve the use and development has been issued by the rail authority. A1.4 Vehicular traffic to and from the site, using an existing vehicle crossing or private level crossing, will not increase by more than: (a) the amounts in Table C3.1; or	P1 Vehicular traffic to and from the site must minimise any adverse effects on the safety of a junction, vehicle crossing or level crossing or safety or efficiency of the road or rail network, having regard to: (a) any increase in traffic caused by the use; (b) the nature of the traffic generated by the use; (c) the nature of the road; (d) the speed limit and traffic flow of the road; (e) any alternative access to a road; (f) the need for the use; (g) any traffic impact assessment; and (h) any advice received from the rail or road authority.

(b) allowed by a licence issued under Part IVA of the Roads and Jetties Act 1935 in respect to a limited access road. A1.5 Vehicular traffic must be able to enter and leave a major road in a forward direction.	

Assessment

Acceptable Solution A1:

- **A1.2** – No new junction is proposed. Any required works within the road reserve will be subject to the approval of the relevant road authority.
- **A1.4** – Not complied with, as traffic generated by the development exceeds the thresholds specified in Table C3.1.
- **A1.5** – Complies, as vehicles can enter and exit the road network in a forward direction, as demonstrated by swept path analysis.

As Acceptable Solution A1.4 is not satisfied, the proposal is assessed against Performance Criteria P1.

Vehicular traffic must minimise any adverse effects on the safety and efficiency of the road network, having regard to:

(a) The Traffic Impact Assessment estimates that the development will generate approximately 16 vehicle movements during the morning peak hour and 16 vehicle movements during the afternoon peak hour. Daily traffic generation is estimated at approximately 36 vehicle movements, including servicing and delivery traffic. Traffic generation is primarily associated with staff shift changes and routine servicing activities.

(b) Traffic is predominantly light vehicles associated with employee access, supplemented by a limited number of service and delivery vehicles, including MRVs and infrequent larger vehicles.

(c) The site is accessed via an existing sealed industrial access road (Access Road 1), configured as a two-way carriageway and designed to accommodate industrial traffic movements.

(d) Mill Road is subject to the Tasmanian rural default speed limit of 100 km/h and provides access to the existing industrial access road serving the site. The surrounding network already accommodates industrial and heavy vehicle traffic associated with existing industrial operations within the Wesley Vale industrial area.

(e) The proposal utilises the existing Access Road connecting to Mill Road. Traffic can access the wider regional road network via Mill Road, Pardoe Road and Port Sorell Road. No new vehicle crossing or new road junction is required.

(f) The proposal represents utility-scale infrastructure within an established industrial precinct, where access via the existing road network is appropriate and expected.

(g) The Traffic Impact Assessment concludes that the traffic generated by the proposal is not expected to adversely affect the safety or function of the surrounding road network. Daily traffic volumes are expected to increase by approximately 2.2% on Pardoe Road and less than 1% on Port Sorell Road. The assessment further concludes that projected 2036 traffic volumes are not expected to significantly affect network performance.

(h) At the time of preparing this report, no specific road authority requirements have been identified. Any works within the road reserve, including any intersection treatment requirements, will be undertaken in consultation with the relevant road authority.

Although the proposal exceeds the threshold specified in Acceptable Solution A1.4, the TIA demonstrates that the additional traffic will not adversely affect the safety or efficiency of the road network.

Although the proposal exceeds the threshold specified in Acceptable Solution A1.4, the Traffic Impact Assessment demonstrates that the additional traffic will not adversely affect the safety or efficiency of the surrounding road

network. The development relies on existing access infrastructure, does not require a new junction or vehicle crossing, and is not expected to result in unreasonable impacts on the operation of Mill Road, Pardoe Road or Port Sorell Road. Accordingly, the proposal satisfies Performance Criteria P1.

7.2.3 Development Standards for Buildings and Works

The following standards do not apply:

- C3.6.1 Habitable buildings for sensitive uses within a road or railway attenuation area (not a habitable building for a sensitive use)

The following standards apply:

- There are no more provisions.

7.2.4 Development Standards for Subdivision

No subdivision proposed as such there are no assessable provisions.

7.3 Electricity Transmission Infrastructure Protection Code – C4.0

7.3.1 Development Exempt from this Code

The Development is not exempt from this Code.

7.3.2 Use Standards

The following use standard(s) do not apply:

- C4.5.1 Sensitive use within a substation facility buffer area (no sensitive use within a substation facility buffer area)
- C4.5.2 Dust or other airborne particulates within an electricity transmission corridor (not within the corridor)

The following use standard(s) apply:

C4.5.3 Dust or other airborne particulates within a substation facility buffer area	
Objective: That dust or other airborne particulates do not cause an unreasonable impact on the safe and reliable operation of electricity transmission infrastructure within a substation facility buffer area.	
Acceptable Solutions	**Performance Criteria**
A1 No Acceptable Solution.	P1 A use listed in Table C4.1 and located within a substation facility buffer area must not generate dust or other airborne particulates that will cause an unreasonable impact on the operation of a substation facility, having regard to: (a) the nature of the proposed use and the materials that will be stored and handled on the site; (b) the conductivity or corrosiveness of any dust or other airborne particulates and its potential to affect the operation

	of the substation facility; (c) proximity to the substation facility; (d) any mitigation measures proposed; and (e) any advice from the electricity entity.

Assessment

There is no Acceptable Solution as such a performance-based assessment is required.

A use listed in Table C4.1 and located within a substation facility buffer area must not generate dust or other airborne particulates that will cause an unreasonable impact on the operation of a substation facility, having regard to the following:

(a) The proposed development comprises advanced computing infrastructure (Utilities) and does not involve bulk material handling, stockpiling, extraction, crushing, processing or transfer of particulate materials. Materials stored on site are limited to finished construction materials, enclosed equipment and consumables associated with data centre operations, none of which are inherently dust-generating during normal operation.

(b) The operation of the facility does not generate conductive or corrosive dust. No materials with known conductive, corrosive or hygroscopic properties are stored, processed or handled in a manner that could generate airborne particulates capable of affecting substation equipment.

(c) While portions of the site, including the access route, are located within the substation facility buffer area, the operational characteristics of the use are such that ongoing dust generation is negligible. The proximity to the substation has informed both site layout and access design to ensure that any potential sources of dust are minimised.

(d) Mitigation measures to prevent dust generation include:

- sealing and stabilisation of access roads and trafficked areas
- implementation of standard construction dust suppression measures (including water suppression and vehicle controls) through a Construction Environmental Management Plan
- maintenance of sealed surfaces and hardstand areas during operation; and
- avoidance of activities that could generate airborne particulates during operation.

These measures ensure that dust generation is effectively controlled during both construction and operation.

(e) Where required, consultation with the relevant electricity entity (e.g. TasNetworks) can be undertaken to confirm that the proposal does not pose a risk to the safe or reliable operation of the substation. No characteristics of the proposed use indicate a need for ongoing operational restrictions beyond standard good-practice controls.

Having regard to the nature of the use, the absence of dust-generating activities, the non-conductive nature of materials associated with the development, the separation and layout of the site, and the proposed mitigation measures, the development will not generate dust or other airborne particulates that cause an unreasonable impact on the operation of the substation facility.

Accordingly, the proposal is considered to satisfy Performance Criteria P1 of Clause C4.5.3 and to be consistent with the Objective of the Electricity Transmission Infrastructure Protection Code.

7.3.3 Development Standards for Buildings and Works

The following standards do not apply:

- C3.6.1 C4.6.1 Buildings or works within an electricity transmission corridor (no building or works within the corridor)

The following standards apply:

C4.6.2 Buildings or works within a substation facility buffer area	
Objective: That buildings or works within a substation facility buffer area are appropriately located to minimise risk to the security, operation, safety and access to existing and future electricity transmission infrastructure.	
Acceptable Solutions	**Performance Criteria**
A1 Buildings or works within a substation facility buffer area must be located not less than 5m from a substation facility.	P1 Buildings or works within a substation facility buffer area and located less than 5m from a substation facility, must minimise any impact on the safety, security, operation or access to the substation facility, having regard to: (a) the nature, height, and materials of the buildings and works; (b) the location of the buildings and works; (c) any proposed mitigation measures; and (d) any advice from the electricity entity.

Assessment

While no buildings are located within close proximity to the substation facility, limited works associated with site servicing and infrastructure may occur within the buffer area and therefore have been assessed against Performance Criteria P1.

Having regard to the matters under P1:

(a) The works within the buffer area are limited to low-scale, non-habitable infrastructure and associated servicing, including underground services and minor ancillary works. These do not involve sensitive uses, tall structures, or materials that would pose a risk to the operation or safety of the substation facility.

(b) The development layout has been designed to maintain separation between the substation facility and all primary buildings, with only incidental and low-intensity works occurring within proximity. The siting ensures that access to the substation and its operational area is not impeded.

(c) The nature of the proposed works inherently minimises risk, with infrastructure limited to essential services and designed to avoid interference with the substation. Any works within the buffer area can be managed through detailed design and construction practices to maintain safe clearances and access.

(d) The proposed development is capable of being undertaken in accordance with any requirements or conditions imposed by the relevant electricity authority, ensuring that operational and safety requirements are maintained.

Overall, the limited and low-intensity nature of the works within the buffer area ensures that the safety, security, operation and access to the substation facility are not adversely affected. Accordingly, the requirements of Performance Criteria P1 are satisfied.

C4.6.3 Buildings or works within a communications station buffer area	
Objective: That buildings or works do not adversely impact upon the safety, security, operation of, and access to, a communications station.	
Acceptable Solutions	**Performance Criteria**
A1	P1

Buildings or works within a communications station buffer area must: (a) be located: (i) not less than 5m from any security fence associated with a communications station; or (ii) not less than 5m from a lot boundary of a lot containing a communications station; and (b) building height must be not more than the height of the communications station's antennae.	Buildings or works within a communications station buffer area must not cause an unreasonable impact on the safety, security, operation of, or access to, the communication station, having regard to: (a) the nature, height and materials of the buildings and works; (b) the location of the buildings and works; and (c) any advice from the electricity entity.
Assessment The proposed buildings and works within the communications station buffer area will not cause an unreasonable impact on the safety, security, operation, or access to the communications station. Having regard to the matters under P1: (a) The works within the buffer area are limited to low-intensity infrastructure and associated servicing, including underground services and potential minor upgrades to the access road. The development does not introduce tall structures, habitable buildings, or materials that would interfere with communications infrastructure. (b) The development maintains appropriate separation from the communications station, with an existing access easement providing a functional buffer and ensuring that access requirements are retained. Any works within this area are limited in extent and consistent with the ongoing use of the land for access and servicing. (c) The proposed works are capable of being undertaken in accordance with any requirements of the relevant infrastructure authority, including the protection of access and operational needs during construction and operation. Overall, the proposal maintains the safe operation and accessibility of the communications infrastructure, and any works within the buffer area are minor, compatible, and do not result in an unreasonable impact. Accordingly, the requirements of Performance Criteria P1 are satisfied.	

7.3.4 Development Standards for Subdivision

No subdivision proposed as such there are no assessable provisions.

7.4 Bushfire-Prone Areas Code – C13.0

The subject land is located within a mapped bushfire-prone area, and the Bushfire-Prone Areas Code is therefore triggered. Notwithstanding this, pursuant to Clause C13.4.1(a), use or development may be exempt from the Code where the Tasmania Fire Service or an accredited person certifies that there is an insufficient increase in bushfire risk to warrant specific bushfire protection measures. While Clause C13.4.1 provides a potential exemption pathway, the proposal has been fully assessed against the requirements of the Code to demonstrate that a tolerable level of bushfire risk can be achieved and maintained.

A bushfire assessment has been undertaken by an accredited practitioner, having regard to the objectives of the Code, the site's extensive prior disturbance, minimal vegetation fuel, industrial context, absence of vulnerable uses and proposed management measures. The assessment concludes that the proposal does not result in a material increase in bushfire risk. An Emergency Management Strategy (Appendix H) and Bushfire Hazard Management Plan (Appendix G) have been prepared by a suitably qualified bushfire practitioner and provided to the Tasmania Fire Service for review and endorsement. These documents demonstrate that a tolerable risk from bushfire can be achieved and maintained for the life of the hazardous use, consistent with the requirements of the Bushfire-Prone Areas Code.

7.4.1 Use Standards

The following standards do not apply:

- C13.5.1 Vulnerable uses.

The following standards apply:

C13.5.2 Hazardous uses	
Objective: That hazardous uses can only be located on land within a bushfire-prone area where tolerable risks are achieved through mitigation measures that take into account the specific characteristics of both the hazardous use and the bushfire hazard.	
Acceptable Solutions	**Performance Criteria**
A1 No Acceptable Solution.	P1 A hazardous use must only be located in a bushfire-prone area if a tolerable risk from bushfire can be achieved and maintained, having regard to: (a) the location, characteristics, nature and scale of the use; (b) whether there is an overriding benefit to the community; (c) whether there is no suitable alternative lower-risk site; (d) the emergency management strategy (hazardous use) and bushfire management plan; and (e) other advice, if any, from the TFS.

Assessment

There is no Acceptable Solution. Accordingly, the proposal is assessed against **Performance Criteria P1**.

The proposed development falls within the Utilities use class and is not inherently hazardous in nature. However, the development includes the storage and handling of limited quantities of hazardous materials associated with backup power generation and operational infrastructure.

Accordingly, the hazardous uses provisions of the Bushfire-Prone Areas Code are applicable, and the proposal must demonstrate that a tolerable level of bushfire risk can be achieved and maintained.

Performance Criterion P1 requires that a hazardous use must only be located in a bushfire-prone area where tolerable bushfire risk can be achieved.

A tolerable level of risk can be achieved and maintained for the following reasons:

(a) The proposal is located within the Wesley Vale industrial precinct on a highly modified and previously cleared platform. The development footprint comprises an engineered hardstand with minimal available fuel load. The use does not involve occupation by vulnerable or residential populations. Hazardous materials are ancillary to the Utilities function and are limited in scale and extent. These materials are managed through standard industrial design measures, including containment, separation distances, and operational controls supported by the Bushfire Hazard Management Plan (Appendix G) and Emergency Management Strategy (Appendix H).

(b) The proposal provides utility-scale advanced computing infrastructure supporting industrial capability, data resilience and broader economic activity. The development represents a strategically significant infrastructure investment within a designated industrial precinct and provides a clear and demonstrable community and economic benefit.

(c) There is no practical alternative site that would materially reduce bushfire risk while maintaining the operational, servicing and strategic siting requirements of the development. The proposal relies on proximity to existing power, telecommunications and transport infrastructure that is specific to this location.

(d) A site-specific Bushfire Hazard Management Plan (Appendix G) and Emergency Management Strategy (Appendix H) have been prepared to address both the bushfire hazard and the hazardous materials profile of the development.

The Bushfire Hazard Management Plan confirms:

- a Bushfire Attack Level of BAL 12.5;
- provision of hazard management areas and reduced fuel zones;
- building construction in accordance with AS3959:2018; and
- dedicated firefighting access and water supply infrastructure.

The Emergency Management Strategy establishes operational procedures for prevention, containment, shutdown and evacuation measures in response to a bushfire event.

(e) The Bushfire Hazard Management Plan has been prepared by a suitably qualified practitioner and submitted to the Tasmania Fire Service for review. Any advice or requirements issued by the Tasmania Fire Service has been incorporated into the final design, certification and operational procedures of the development.

Having regard to the highly modified site conditions, the limited on-site fuel load, the ancillary and controlled nature of hazardous materials, and the implementation of a site-specific Bushfire Hazard Management Plan and Emergency Management Strategy, the proposal is capable of achieving and maintaining a tolerable level of bushfire risk over the life of the development.

Accordingly, the proposal satisfies Performance Criteria P1.

A2	P2
An emergency management strategy (hazardous use) endorsed by the TFS or accredited person.	No Performance Criterion.

Assessment

Acceptable Solution A2 requires an Emergency Management Strategy (hazardous use) endorsed by the Tasmania Fire Service or an accredited person.

An Emergency Management Strategy (Appendix H) has been prepared for the proposal addressing:

- hazardous materials inventory and storage
- ignition prevention and operational controls
- shutdown and isolation procedures
- fire detection and suppression systems
- containment measures
- emergency response and evacuation procedures

The EMS has been endorsement by the Tasmania Fire Service. Accordingly, the proposal is capable of complying with Acceptable Solution A2.

A3	P3
A bushfire hazard management plan that contains appropriate bushfire protection measures that is certified by the TFS or an accredited person.	No Performance Criterion.

Assessment

Acceptable Solution A3 requires a Bushfire Hazard Management Plan certified by the Tasmania Fire Service or an accredited person.

A Bushfire Hazard Management Plan (Appendix G) has been prepared and demonstrates appropriate bushfire protection measures, including:

- hazard management areas and fuel reduction
- defendable space
- firefighting access and circulation
- site-based firefighting water supply
- measures to manage hazardous materials exposure during bushfire events

Subject to certification and implementation, the proposal complies with Acceptable Solution A3.

7.4.2 Development Standards for Subdivision

No subdivision is proposed as such there are no assessable provisions.

8. Impact Assessment

The Planning Scheme requires consideration of the potential effects of a development on surrounding land, infrastructure, environmental values and public safety. To inform this assessment, the proposal has been supported by specialist investigations addressing traffic, noise, water servicing, wastewater management, bushfire risk and emergency management. Those investigations are contained in the accompanying appendices and provide the technical basis for the assessment below. This section considers whether the proposal is capable of operating within the Wesley Vale industrial precinct without resulting in unreasonable impacts, having regard to the nature of the use, the characteristics of the site and the findings of the supporting technical reports.

8.1 Traffic and Access

A Traffic Impact Assessment has been prepared for the proposed development and is included as Appendix C. The assessment considers access arrangements, traffic generation, parking provision, servicing requirements and operational impacts on the surrounding road network.

The site is accessed via an existing industrial access road extending from Mill Road, which also provides access to adjacent utility infrastructure. Mill Road connects to Pardoe Road and Port Sorell Road, providing access to the wider regional road network, including the Bass Highway. The development will generate traffic associated with:

- staff shift changes associated with 24-hour operation
- routine servicing and maintenance activities
- delivery vehicles; and
- occasional heavy vehicle movements associated with equipment replacement and maintenance.

The Traffic Impact Assessment estimates approximately 16 vehicle movements during both the AM and PM peak periods and approximately 36 vehicle movements per day overall. These traffic volumes are considered low in the context of the surrounding road network and industrial setting. The assessment concludes that the additional traffic generated by the development will not adversely affect the safety or operational performance of Mill Road, Pardoe Road or Port Sorell Road.

Parking is provided entirely on-site, with 27 car parking spaces, including accessible parking spaces, together with bicycle parking facilities. The parking provision exceeds anticipated operational demand and is sufficient to accommodate staff, visitors and maintenance personnel

Internal circulation areas have been designed to accommodate the vehicles expected to regularly service the site, including Medium Rigid Vehicles and Heavy Rigid Vehicles. Swept-path analysis confirms that these vehicles can safely enter, manoeuvre within and exit the site in a forward direction. Provision is also made for the temporary management of larger maintenance vehicles when required.

The Traffic Impact Assessment also recommends basic left-turn and right-turn treatments at the Mill Road / Access Road intersection. These treatments are incorporated within the proposed design and will be subject to the requirements of the relevant road authority.

Overall, the proposed access, parking, circulation and servicing arrangements are appropriate for the development and are capable of operating safely and efficiently without resulting in unreasonable impacts on the surrounding transport network.

8.2 Environment

The proposed facility has been designed to minimise environmental impacts during both construction and operation. Key considerations include noise emissions, air quality, and lighting impacts.

8.2.1 Noise

A detailed noise assessment has been prepared to evaluate potential operational noise emissions from the proposed utility-scale advanced computing infrastructure at Wesley Vale (Appendix D). The assessment considers nearby sensitive receivers, including rural dwellings within approximately 1 km of the site.

The primary noise sources associated with the development comprise cooling infrastructure (adiabatic coolers and evaporative chillers) and standby power generation equipment. These elements are characteristic of infrastructure of this scale and have been assessed using recognised industry-standard modelling tools and conservative input assumptions.

Noise assessment criteria have been derived with reference to the *Environmental Protection Policy (Noise) 2009* and the principle of avoiding unreasonable loss of amenity. In the absence of specific planning scheme standards for this use, an intrusiveness criterion of background noise level +5 dB(A) has been adopted, which represents established good practice for industrial noise assessment.

Noise modelling has been undertaken using SoundPLAN software, based on predicted sound power levels of plant operating at full capacity. This represents a worst-case scenario, as full output conditions occur only infrequently, typically during short periods of elevated ambient temperature.

The modelling demonstrates that predicted operational noise levels at all sensitive receivers remain below the adopted background +5 dB(A) criterion.

Importantly, the modelled scenario is conservative and does not reflect typical operating conditions. In practice:

- cooling systems operate predominantly at part-load, with reduced fan speeds for the majority of the time, particularly during overnight periods
- ambient temperatures at Wesley Vale result in lower cooling demand and correspondingly reduced noise emissions for most operating hours; and
- standby generators are not a routine noise source and will operate only during testing (daytime hours) or infrequent power outage events.

The noise assessment also incorporates recommended mitigation and design measures to provide an appropriate margin of compliance, including:

- selection of low-noise plant and equipment and provision of manufacturer-certified acoustic data
- acoustic attenuation of generators, including silencers and enclosure treatments
- use of speed-controlled fans on cooling equipment to minimise noise emissions under typical operating conditions; and
- provision of a perimeter acoustic barrier to rooftop plant to limit sound propagation.

Construction noise will be temporary and limited to standard daytime construction hours. Based on the nature of the works, construction noise is not expected to result in unreasonable impacts at nearby sensitive receivers.

Overall, the assessment demonstrates that the proposed development:

- will not result in a significant increase in background noise levels
- will not cause an unreasonable loss of amenity at nearby sensitive receivers; and
- is capable of achieving compliance with applicable noise management expectations under the Tasmanian environmental framework.

On this basis, the proposal is considered acceptable in terms of noise impact.

8.2.2 Air Quality and Dust Emissions

During construction, there is potential for dust generation associated with earthworks, vehicle movements and material handling. These impacts will be managed through the implementation of a Construction Environmental Management Plan (CEMP), which will include:

- dust suppression measures such as water spraying and stabilisation of exposed surfaces
- vehicle wash-down protocols to prevent dust and sediment tracking
- management of construction activities during adverse weather conditions, including high winds

Once operational, the facility is not expected to generate significant airborne emissions. The development does not involve industrial processing, material handling or combustion-based activities (other than infrequent backup generator testing), and therefore does not represent a material air quality risk.

8.2.3 Lighting

External lighting is provided to support safe operation of the facility, including illumination of access roads, parking areas and building interfaces. Lighting design has been developed to achieve appropriate operational visibility while minimising off-site impacts. The system comprises low-intensity, energy-efficient LED luminaires mounted on poles and building structures, designed to provide consistent coverage across operational areas.

Lighting has been designed to:

- direct illumination toward required areas only
- minimise light spill beyond the site boundary
- reduce glare through appropriate luminaire design and shielding
- avoid unnecessary upward light distribution

Given the industrial location and absence of sensitive receptors in close proximity, lighting impacts are expected to be minimal. The lighting design ensures safe site operation without resulting in unreasonable impacts on surrounding land or the wider environment.

8.3 Water Supply, Wastewater and Stormwater Management

The proposed development incorporates an integrated on-site water supply, storage, treatment and wastewater management system designed to support cooling operations, fire protection infrastructure and staff amenities. Detailed engineering investigations have been prepared and are included as Appendix E – Wastewater and Appendix F – Water Supply. These investigations confirm that the proposed servicing strategy can be accommodated within the site and appropriately managed through dedicated water storage, treatment and disposal infrastructure.

The primary water demand associated with the facility relates to cooling infrastructure. The supporting water assessment identifies that cooling activities account for the majority of operational water use, with approximately 90% of cooling water evaporated as part of the cooling process and only a small residual volume requiring subsequent management. Water supply is proposed to be provided through a combination of harvested roof rainwater and trucked potable water, supported by dedicated on-site storage infrastructure. A cooling water storage capacity of approximately 700 kL is proposed to provide operational resilience and reduce reliance on external supply networks.

Personnel water demand is comparatively minor and relates primarily to staff amenities including toilets, showers and kitchen facilities. Wastewater generated from these activities is estimated at approximately 0.9 kL per day and will be treated on-site through an Aerated Wastewater Treatment System (AWTS). Treated effluent will be disposed of within a dedicated lined disposal trench or bed system located within the site. The wastewater assessment concludes that the proposed disposal area can be accommodated clear of waterways and other sensitive receiving environments.

The wastewater assessment also identifies that cooling water passthrough volumes and periodic fire system flushing water are expected to remain of relatively high quality and occur infrequently. These flows are proposed to be directed to the site's stormwater management system rather than the wastewater treatment system, reflecting both their limited volume and water quality characteristics.

Having regard to the findings and recommendations contained within Appendix E – Wastewater and Appendix F – Water Supply, the proposal incorporates an appropriate and self-contained servicing solution that avoids unreasonable impacts on water quality, surrounding land, receiving environments and external infrastructure networks. The proposed water management framework is therefore considered suitable for the scale and operational requirements of the development.

8.4 Natural Values

The development does not introduce new features that would attract fauna into the operational area or increase the risk of collision or disturbance. Landscaping and site treatments are consistent with the industrial character of the site and surrounds and do not create habitat attractants within the development footprint.

Overall, the proposal avoids direct impacts on natural values and presents a low risk of indirect impact. This outcome is achieved through the use of previously disturbed land, appropriate siting of development, and the implementation of standard construction and operational mitigation measures. The development represents an appropriate reuse of industrial land that maintains the integrity of surrounding natural values while supporting the ongoing function of the industrial area at Wesley Vale.

8.5 Visual

The building’s form, materials and finish have been selected to minimise visual prominence within both the surrounding landscape and the established industrial context. The use of precast concrete at lower levels, combined with dark, vertically textured cladding and screened plant above, reduces reflectivity and limits visual contrast when viewed from surrounding land and longer-range vantage points, including from the surrounding farm land.

Architectural visualisations, including perspective renderings and aerial views provided in Appendix B, demonstrate how the development will be perceived within its setting. These visualisations confirm that the building presents as a low, horizontally expressed form, with the primary roof height maintained at approximately 8.5 m and rooftop plant contained within a recessed and screened enclosure. This approach reduces the perceived bulk of the development and avoids the visual prominence of exposed plant infrastructure.

The elevations maintain a consistent and understated architectural expression, with articulation achieved through material texture rather than pronounced changes in massing. This avoids unnecessary visual complexity and ensures the development reads as a cohesive, infrastructure-based facility rather than a visually dominant structure.

Overall, the design responds to the industrial character of the Wesley Vale precinct while acknowledging the broader agricultural landscape in which it is situated. The scale, siting and materiality of the buildings ensure integration with the surrounding context, such that the development will not result in an unreasonable visual impact.

Materials Selection:



PRECAST CONCRETE - SMOOTH

SURFACE TO BE UNIFORM IN TEXTURE & FREE FROM SURFACE IMPERFECTIONS. CONCRETE SEALANT ADDED TO CONCRETE MIX. ADDITIONAL SURFACE FINISH: AF-01



METAL DOWNPIPE

COLORBOND DOWNPIPE, MONUMENT COLOUR (GUTTER AND DOWNPIPE)



DOUBLE GLAZED WINDOW TBC. TO MEET SECTION J REQUIREMENTS



RECKLI 2/48 RUHR TEXTURED FORMLINER

FINISH APPLIED ON EWD-01. PATTERN TO BE CONSISTENT ACROSS PANELS WITH ALIGNED JOINTS AS REQUIRED. ENSURE MOULDS ARE CLEAN & FREE OF DEFECTS TO ACHIEVE A UNIFORM ARCHITECTURAL SURFACE. COORDINATE WITH STRUCTURAL & PRECAST MFR FOR PANEL SIZE, JOINT LAYOUT, & MOULD HANDLING.

8.6 Safety, Security and Crime Prevention

The proposed facility has been designed with a strong emphasis on safety, security, and crime prevention, consistent with best practice principles and the Safe Design Guidelines. Given the nature of the facility, housing critical digital infrastructure and operating 24/7, security is a fundamental design consideration.

The layout of the site and building orientation has been designed to maximise passive surveillance. Key features include:

- Glazed entry points and office areas that overlook internal access roads and parking areas, allowing staff to observe activity around the site.
- Strategic placement of lighting and CCTV to ensure visibility across all access points and external areas, deterring unauthorised access and enhancing after-hours safety.

The site layout avoids the creation of concealed or isolated areas by:

- Ensuring clear sightlines along pedestrian paths and between buildings
- Avoiding recessed doorways or alcoves that could create hiding places; and
- Incorporating open fencing and landscaping that maintains visibility while securing the perimeter.

The building design includes windows and transparent doors facing shared accessways and parking areas, enabling natural surveillance and reinforcing a sense of safety for staff and visitors.

The development has been guided by the following principles:

- Controlled access points with secure entry systems
- Perimeter fencing that is both secure and visually permeable
- Emergency egress routes that are well-lit, signposted, and unobstructed; and
- Designated pedestrian pathways separated from vehicle movements to reduce conflict and improve safety.

These measures collectively ensure that the facility will operate as a secure, resilient, and safe facility for staff, contractors, and the broader community.

9. Conclusion

This Planning Report has assessed the proposed development of advanced computing infrastructure (the facility) at Mill Road, Wesley Vale against the provisions of the Tasmanian Planning Scheme – Latrobe, including the applicable zone standards, overlay controls and development codes.

The proposed use is appropriately classified as Utilities and is a Permitted use within the General Industrial Zone. The proposal is therefore supported in principle by the Planning Scheme, subject to compliance with the relevant development standards and applicable codes. The assessment demonstrates that the proposal is consistent with the purpose of the General Industrial Zone and supports the ongoing use of the Wesley Vale locality for infrastructure-based and utility-scale development that requires separation from sensitive uses and access to strategic servicing and transport networks.

The proposal has been assessed against the relevant standards of the Planning Scheme and is capable of achieving compliance with all applicable provisions. Where reliance on Performance Criteria is required, this is supported by detailed technical assessment demonstrating that the intent of the applicable standards is met.

The following discretion has been identified and addressed within this report:

- Clause 2.5.4 (P1) Loading Bays
- Clause 2.6.5 (P1) Pedestrian Access
- Clause 3.5.1 (P1) Traffic generation at a vehicle crossing, level crossing or new junction
- Clause 4.5.3 (P1) Dust or other airborne particulates within a substation facility buffer area
- Clause 4.6.2 (P1) Buildings or works within a substation facility buffer area
- Clause 4.6.3 (P1) Buildings or works within a communications station buffer area
- Clause 13.5.2 (P1) Hazardous use

In each case, the assessment confirms that:

- The development is appropriate within its industrial context
- Impacts on infrastructure, amenity and environmental values are acceptable; and
- The intent of the relevant Performance Criteria is satisfied.

The proposal is supported by a suite of targeted technical documentation, including assessments addressing traffic and access, noise emissions, water management and wastewater disposal. These investigations confirm that the development can operate within acceptable environmental and infrastructure constraints and will not result in unreasonable impacts on surrounding land or the broader locality.

Overall, the proposal represents an appropriate, orderly and sustainable use and development of land within the General Industrial Zone, consistent with the planning framework and the established role of the Wesley Vale area. The development is therefore considered suitable for approval.

Important Information About Your Report

In some circumstances the scope of services may have been limited by a range of factors such as time, budget, access and/or site disturbance constraints. The Report may only be used and relied on by the Client for the purpose set out in the Report. Any use which a third party makes of this document, or any reliance on or decisions to be made based on it, is the responsibility of the Client or such third parties.

The services undertaken by pitt&sherry in connection with preparing the Report were limited to those specifically detailed in the report and are subject to the restrictions, limitations and exclusions set out in the Report. The Report's accuracy is limited to the time period and circumstances existing at the time the Report was prepared. The opinions, conclusions and any recommendations in the Report are based on conditions encountered and information reviewed at the date of preparation of the Report. pitt&sherry has no responsibility or obligation to update the Report to account for events or changes occurring after the date that the report was prepared. If such events or changes occurred after the date that the report was prepared render the Report inaccurate, in whole or in part, pitt&sherry accepts no responsibility, and disclaims any liability whatsoever for any injury, loss or damage suffered by anyone arising from or in connection with their use of, reliance upon, or decisions or actions based on the Report, in whole or in part, for whatever purpose.

Title Information

Annexure A

pitt&sherry

'Priority final plan'

OWNER: TANKRIS PTY LTD

FOLIO REFERENCE: C.T.182276/1

GRANTEE: PART OF LOT 6230 (320 ACRES) GRANTED TO WILLIAM TAYLOR NOYES AND PART OF LOT 6016 (170 ACRES) GRANTED TO JAMES ALFRED DUNN.

PLAN OF SURVEY

NOVA LAND CONSULTING

BY SURVEYOR: COLIN STERLING SMITH

LOCATION: LAND DISTRICT OF DEVON
PARISH OF TEMPLETON

SCALE 1: 10000 LENGTHS IN METRES

Registered Number

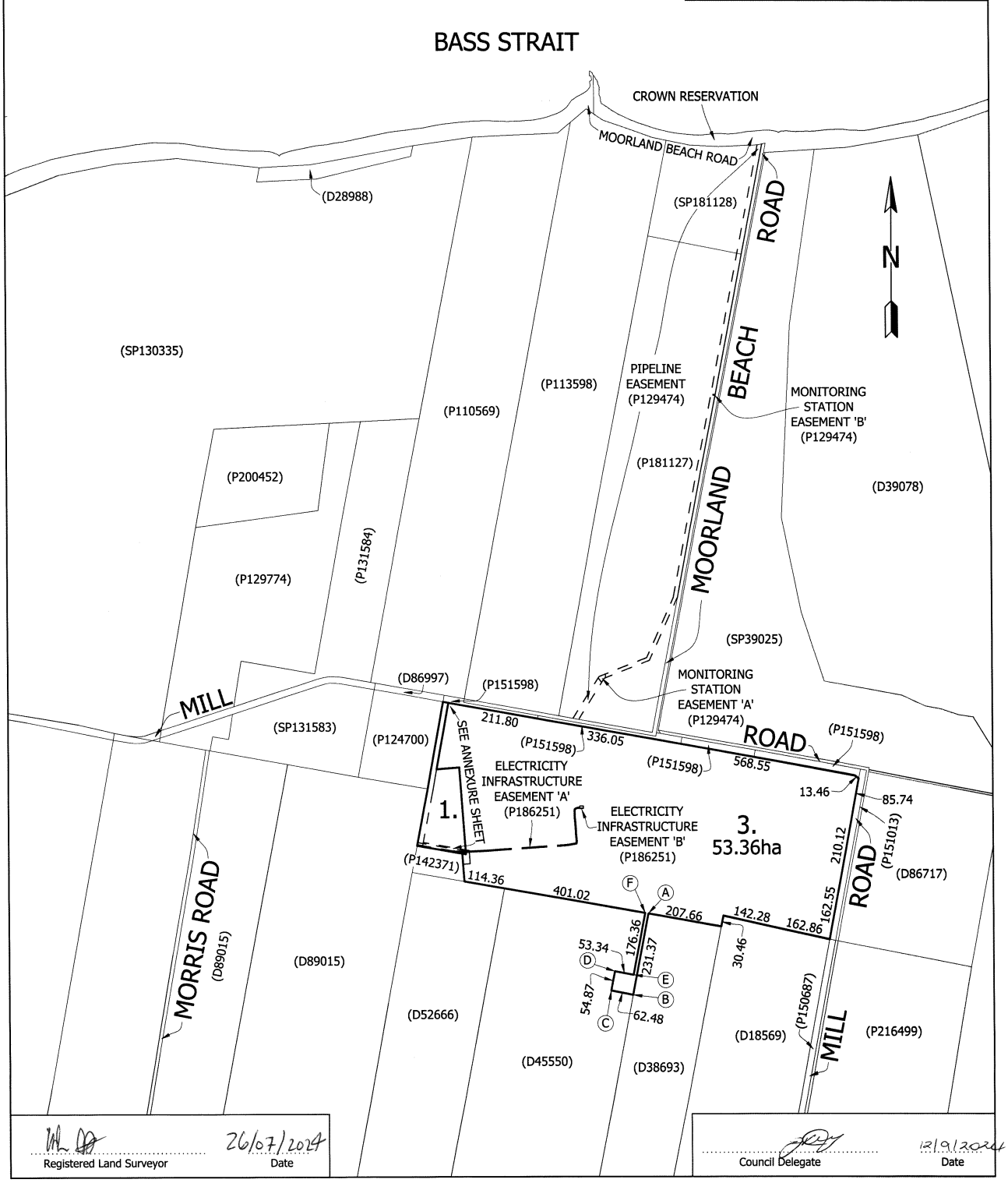
SP187534

APPROVED
EFFECTIVE FROM 28 NOV 2024

Recorder of Titles

LOT 3 IS COMPILED FROM C.T.182276/1 AND THIS SURVEY.

ALL EXISTING SURVEY NUMBERS TO BE CROSS REFERENCED ON THIS PLAN

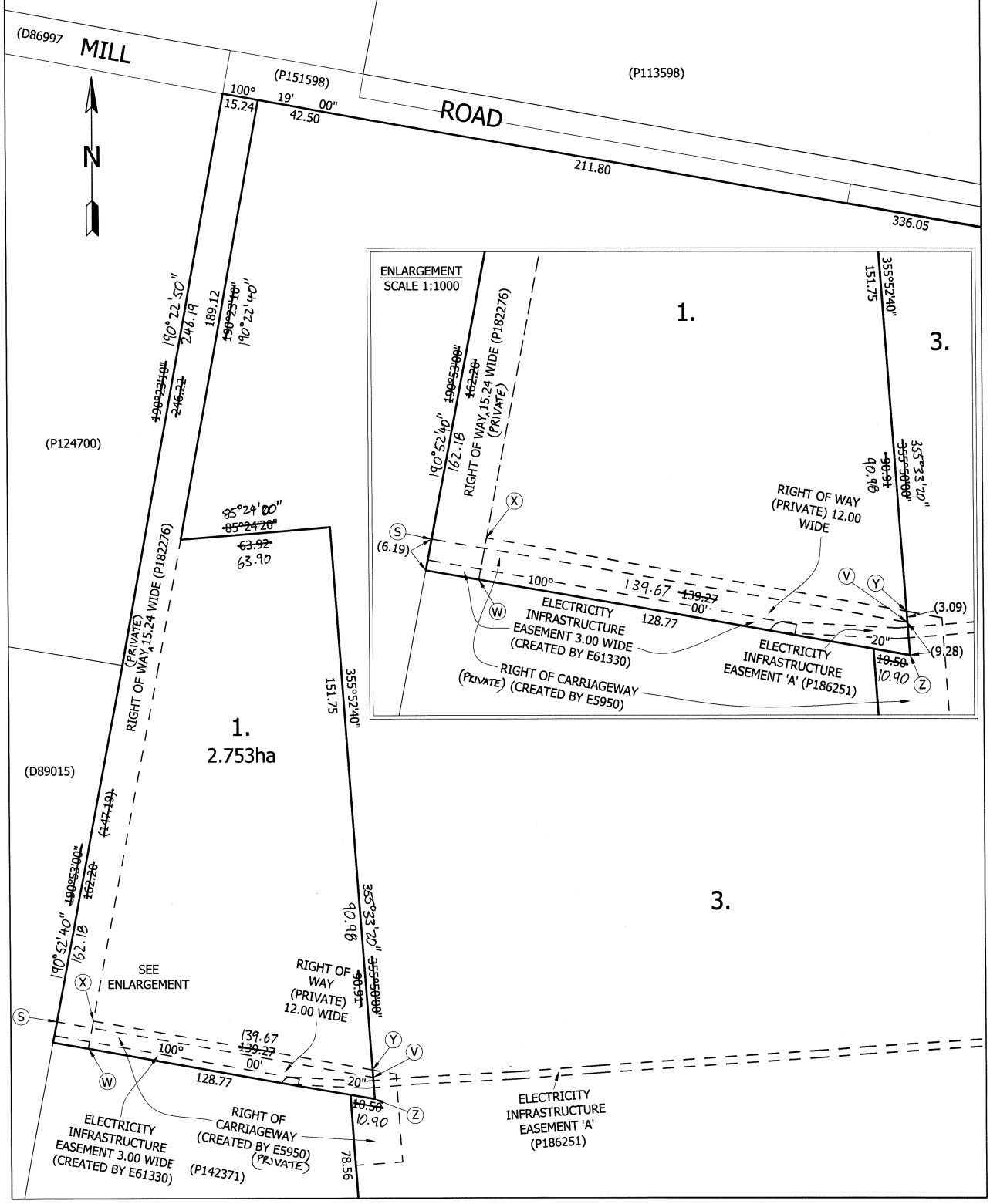


Registered Land Surveyor 26/07/2024 Date

Council Delegate 12/9/2024 Date

'Priority final Plan'

PLAN OF SURVEY ANNEXURE SHEET SHEET 1 OF 1 SHEETS NOVA LAND CONSULTING	OWNER: TANKRIS PTY LTD FOLIO REFERENCE: C.T.182276/1 SCALE 1: 1500 LENGTHS IN METRES	Registered Number SP 187534
SIGNED FOR IDENTIFICATION PURPOSES Council Delegate 26/11/24 Date	THIS ANNEXURE SHEET FORMS PART OF THE ATTACHED INDEX PLAN. Registered Land Surveyor 26/07/2024 Date	APPROVED / EFFECTIVE FROM 28 NOV 2024 Recorder of Titles



RESULT OF SEARCH

RECORDER OF TITLES

Issued Pursuant to the Land Titles Act 1980

Tasmanian Government

SEARCH OF TORRENS TITLE

VOLUME	FOLIO
187534	3
EDITION	DATE OF ISSUE
1	28-Nov-2024

SEARCH DATE : 25-May-2026
SEARCH TIME : 11.26 am

DESCRIPTION OF LAND

Parish of TEMPLETON Land District of DEVON
Lot 3 on Sealed Plan 187534
Derivation : Part of Lot 6230, 320 Acres Gtd. to William Taylor Noyes and Part of Lot 6016, 170 Acres Gtd. to James Alfred Dunn
Prior CT 182276/1

SCHEDULE 1

M751177 TRANSFER to TANKRIS PTY LTD Registered 10-Apr-2019 at noon

SCHEDULE 2

Reservations and conditions in the Crown Grant if any
SP187534 EASEMENTS in Schedule of Easements
SP187534 FENCING PROVISION in Schedule of Easements
39/8806 CONVEYANCE Made subject to fencing provision relating to the land marked A.B.C.D.E.F. on Plan 182276
D123208 LEASE to NBN CO LIMITED of a leasehold estate for the term of 10 years from 30-Apr-2023 (of that part of the said land within described shown as Lot 1 on Annexure Plan B attached to the said Lease) Registered 08-May-2014 at 12.01 pm

UNREGISTERED DEALINGS AND NOTATIONS

No unregistered dealings or other notations

SCHEDULE OF EASEMENTS	Registered Number
NOTE: THE SCHEDULE MUST BE SIGNED BY THE OWNERS & MORTGAGEES OF THE LAND AFFECTED. SIGNATURES MUST BE ATTESTED.	SP 187534

EASEMENTS AND PROFITS

Each lot on the Plan is together with:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as may be necessary to drain the stormwater and other surplus water from such lot; and
(2) any easements or profits a prendre described hereunder.
Each lot on the Plan is subject to:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as passing through such lot as may be necessary to drain the stormwater and other surplus water from any other lot on the Plan; and
(2) any easements or profits a prendre described hereunder.
The direction of the flow of water through the drainage easements shown on the Plan is indicated by arrows.

EASEMENTS

Lot 1 is subject to a Right of Carriageway (appurtenant to the land shown in deeds office diagram 89/75) over the land marked "Right of Way 15.24 Wide (P182276)".
(Private)

Lot 1 is subject to the full and unrestricted right (appurtenant as aforesaid) for The Hydro Electric Commission at all times hereafter across the land marked "Right of Way 15.24 Wide (P182276)" for towers, poles, wires and other necessary apparatus and appliances for the purpose of transmitting and distributing electrical energy.
to construct and maintain in under along and *

Lot 1 is subject to a burdening Electricity Infrastructure Easement with the benefit of a restriction as to user of land in favour Tasmanian Networks Pty Ltd on the terms prescribed in E61330 over the land marked "Electricity Infrastructure Easement 3.00 Wide (created by E61330)".
on the Plan

Each of Lots 1 and 3 are subject to a Right of Carriageway in favour of Lot 1 on plan 142371 over those parts of the "Right of Carriageway (created by E5950)" shown on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way 15.24 Wide (P182276)" shown on the plan.
(Private)

Lot 3 is together with a Right of Carriageway over the "Right of Way 15.24 (P182276)" shown passing through Lot 1 on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way (private) 12.00 Wide" marked "WXYZ"

Lot 3 is together with a Right of Carriageway over the "Right of Way (private) 12.00 Wide" marked "WXYZ" shown passing through Lot 1 on the plan.

~~Lot 1 is subject to a Right of Drainage in favour of Lot 3 over the "Drainage Easement "C" 6.00 Wide" shown on the plan.~~

(USE ANNEXURE PAGES FOR CONTINUATION)

SUBDIVIDER: Tankris Pty Ltd	PLAN SEALED BY: Latrobe Council
FOLIO REF: 182276/1	DATE: 12/9/2024
SOLICITOR & REFERENCE: Will Edwards Rae & Partners Lawyers	L-DA254/2022 REF NO.
	Council Delegate

NOTE: The Council Delegate must sign the Certificate for the purposes of identification.

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* Amelia Kate Goss 11/11/24
as solicitor for Subdivider

ANNEXURE TO SCHEDULE OF EASEMENTS PAGE 2 OF 2 PAGES	Registered Number SP 187534
SUBDIVIDER: Tankris Pty Ltd FOLIO REFERENCE: 182276/1	

Lot 3 is subject to an Electricity Infrastructure Easement in favour of Tasmanian Networks Pty Ltd on the terms specified in N168400 over the "Electricity Infrastructure Easement "B" (P186251)" shown passing through Lot 3 on the plan.

Lots 1 and 3 are each subject to an Electricity Infrastructure Easement in favour of Tasmanian Networks Pty Ltd on the terms specified in N168400 over the "Electricity Infrastructure Easement 'A' (P186215)" shown passing through lots 1 and 3 on the plan.*

FENCING PROVISION

In respect of each Lot on the Plan
The Owners, Tankris Pty Ltd shall not be required to fence.

EXECUTED by **TANKRIS PTY LTD** (ACN 009 573 899) as the registered proprietor of the property comprised in Folio of the Register Volume 182276 Folio 1 in accordance with Section 127 of the Corporations Act 2001:

.....
[Director] Anthony Wayne Seymour

.....
[Director/~~Secretary~~] Nadia Ana Seymour

Lot 3 is together with pipeline rights and other rights (more fully set forth in C81401) over the areas marked "Pipeline Easement (P129424)" and "monitoring station Easement 'A'" (subject to the conditions mentioned therein) on the plan. * & 'B'

* Amelia Kate Cox as solicitor for the Subdivider 11/11/24

NOTE: Every annexed page must be signed by the parties to the dealing or where the party is a corporate body be signed by the persons who have attested the affixing of the seal of that body to the dealing.

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'Priority final plan'

OWNER: TANKRIS PTY LTD

FOLIO REFERENCE: C.T.182276/1

GRANTEE: PART OF LOT 6230 (320 ACRES) GRANTED TO WILLIAM TAYLOR NOYES AND PART OF LOT 6016 (170 ACRES) GRANTED TO JAMES ALFRED DUNN.

PLAN OF SURVEY

NOVA LAND CONSULTING

BY SURVEYOR: COLIN STERLING SMITH

LOCATION: LAND DISTRICT OF DEVON
PARISH OF TEMPLETON

SCALE 1: 10000 LENGTHS IN METRES

Registered Number

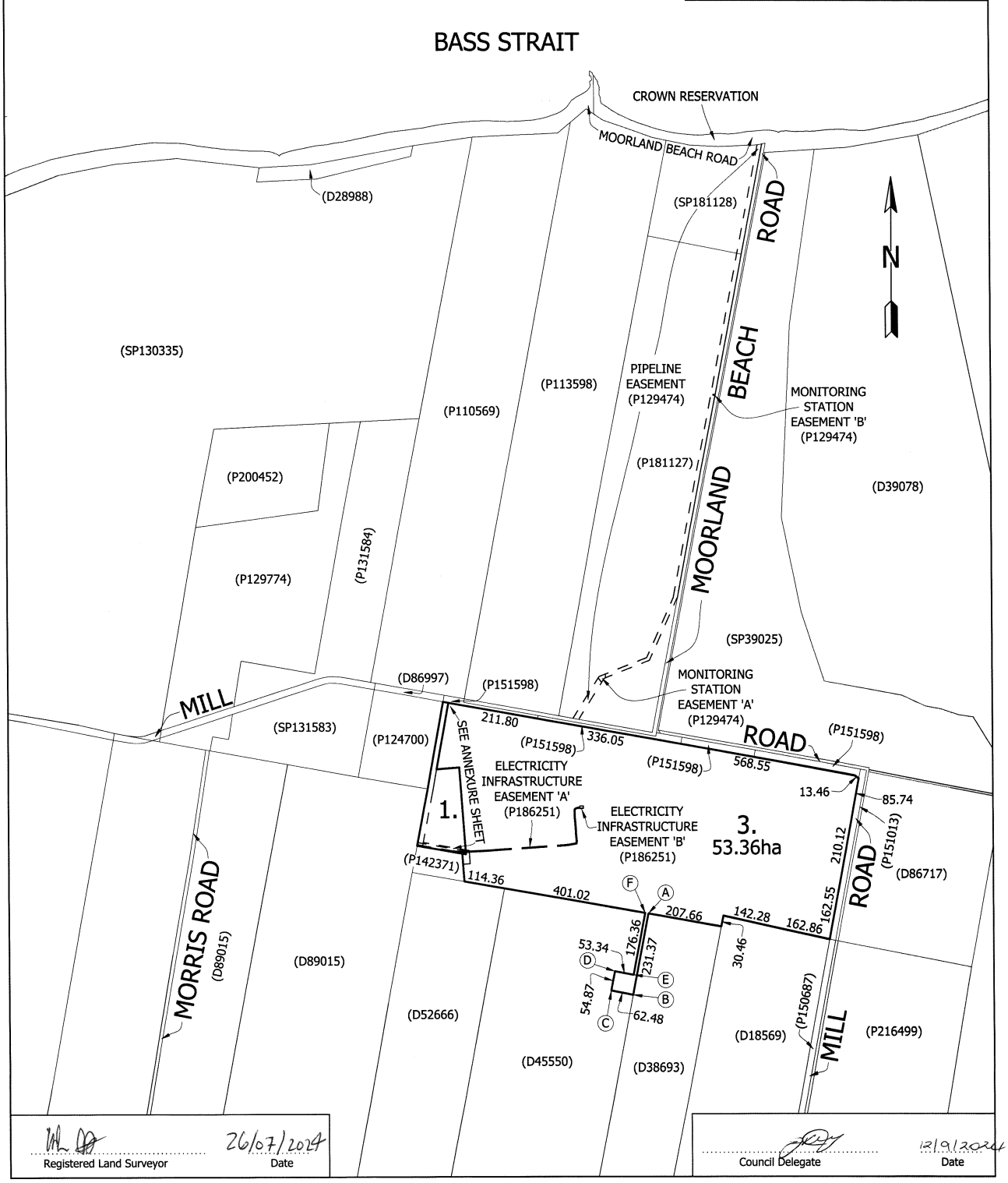
SP187534

APPROVED
EFFECTIVE FROM 28 NOV 2024

Recorder of Titles

LOT 3 IS COMPILED FROM C.T.182276/1 AND THIS SURVEY.

ALL EXISTING SURVEY NUMBERS TO BE CROSS REFERENCED ON THIS PLAN

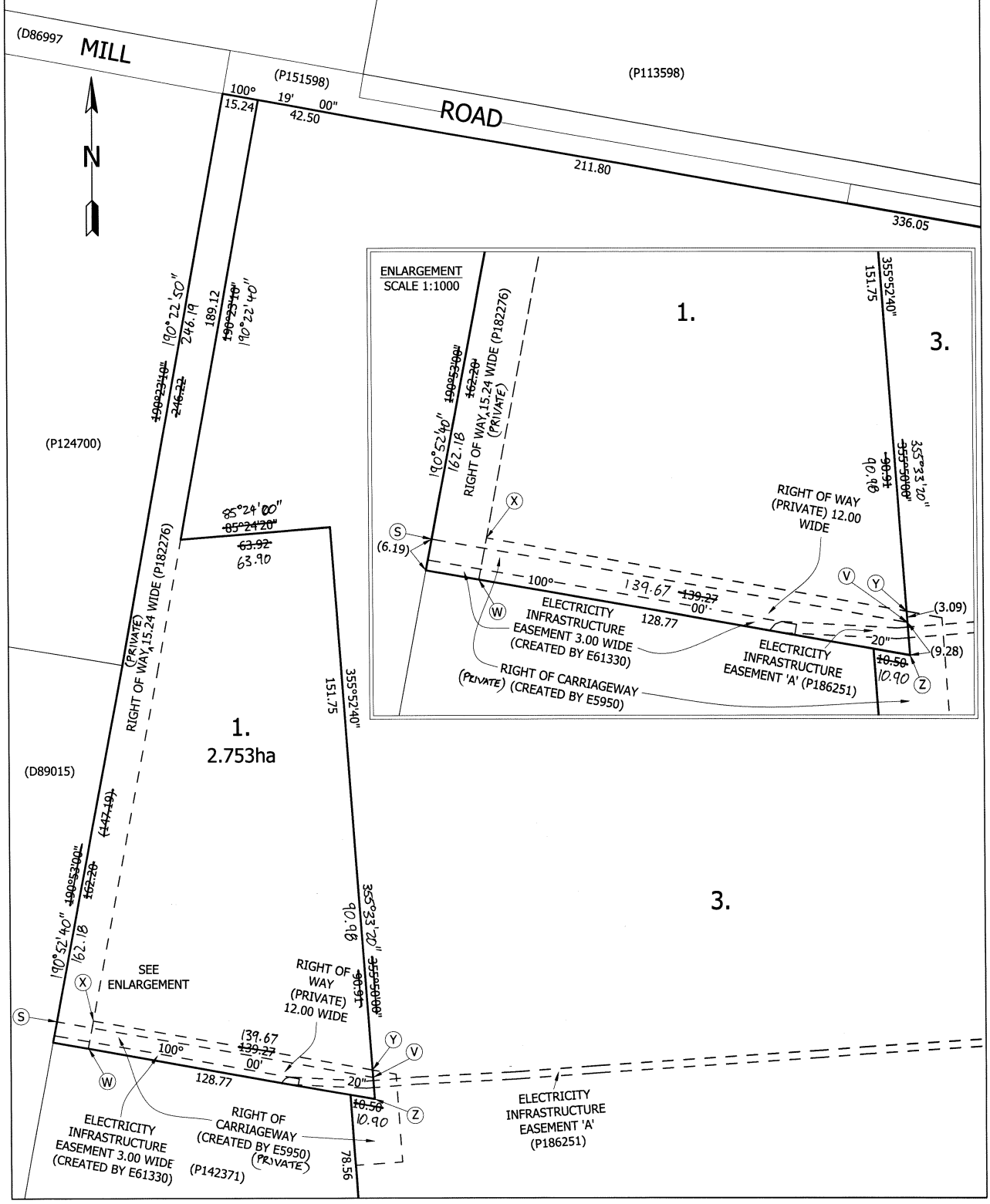


Registered Land Surveyor 26/07/2024 Date

Council Delegate 12/9/2024 Date

'Priority final Plan'

PLAN OF SURVEY ANNEXURE SHEET SHEET 1 OF 1 SHEETS NOVA LAND CONSULTING	OWNER: TANKRIS PTY LTD FOLIO REFERENCE: C.T.182276/1 SCALE 1: 1500 LENGTHS IN METRES	Registered Number SP 187534
SIGNED FOR IDENTIFICATION PURPOSES Council Delegate 26/11/24 Date	THIS ANNEXURE SHEET FORMS PART OF THE ATTACHED INDEX PLAN. Registered Land Surveyor 26/07/2024 Date	APPROVED / EFFECTIVE FROM 28 NOV 2024 Recorder of Titles



RESULT OF SEARCH

RECORDER OF TITLES

Issued Pursuant to the Land Titles Act 1980

Tasmanian Government

SEARCH OF TORRENS TITLE

VOLUME	FOLIO
187534	1
EDITION	DATE OF ISSUE
1	28-Nov-2024

SEARCH DATE : 08-Apr-2026
SEARCH TIME : 10.56 am

DESCRIPTION OF LAND

Parish of TEMPLETON Land District of DEVON
Lot 1 on Sealed Plan 187534
Derivation : Part of Lot 6230, 320 Acres Gtd. to William Taylor Noyes
Prior CT 182276/1

SCHEDULE 1

M751177 TRANSFER to TANKRIS PTY LTD Registered 10-Apr-2019 at noon

SCHEDULE 2

Reservations and conditions in the Crown Grant if any
SP187534 EASEMENTS in Schedule of Easements
SP187534 FENCING PROVISION in Schedule of Easements
E386543 AGREEMENT pursuant to Section 78 of the Land Use Planning and Approvals Act 1993 Registered 28-Nov-2024 at noon

UNREGISTERED DEALINGS AND NOTATIONS

N122862 PRIORITY NOTICE reserving priority for 90 days TRANSFER Tankris Pty Ltd as Trustee for Wesley Vale Unit Trust to Firmus Technologies Pty Ltd Lodged by RAE & PARTNERS(DPO) on 14-Jan-2026 BP: N122862
N289810 TRANSFER to FIRMUS TECHNOLOGIES PTY LTD Lodged by RAE & PARTNERS(DPO) on 04-Mar-2026 BP: N289810

SCHEDULE OF EASEMENTS	Registered Number
NOTE: THE SCHEDULE MUST BE SIGNED BY THE OWNERS & MORTGAGEES OF THE LAND AFFECTED. SIGNATURES MUST BE ATTESTED.	SP187534

EASEMENTS AND PROFITS

Each lot on the Plan is together with:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as may be necessary to drain the stormwater and other surplus water from such lot; and
(2) any easements or profits a prendre described hereunder.
Each lot on the Plan is subject to:-
(1) such rights of drainage over the drainage easements shown on the Plan (if any) as passing through such lot as may be necessary to drain the stormwater and other surplus water from any other lot on the Plan; and
(2) any easements or profits a prendre described hereunder.
The direction of the flow of water through the drainage easements shown on the Plan is indicated by arrows.

EASEMENTS

Lot 1 is subject to a Right of Carriageway (appurtenant to the land shown in deeds office diagram 89/75) over the land marked "Right of Way 15.24 Wide (P182276)".
(Private)

Lot 1 is subject to the full and unrestricted right (appurtenant as aforesaid) for The Hydro Electric Commission at all times hereafter across the land marked "Right of Way 15.24 Wide (P182276)" for towers, poles, wires and other necessary apparatus and appliances for the purpose of transmitting and distributing electrical energy.
to construct and maintain in under along and *

Lot 1 is subject to a burdening Electricity Infrastructure Easement with the benefit of a restriction as to user of land in favour Tasmanian Networks Pty Ltd on the terms prescribed in E61330 over the land marked "Electricity Infrastructure Easement 3.00 Wide (created by E61330)".
on the Plan

Each of Lots 1 and 3 are subject to a Right of Carriageway in favour of Lot 1 on plan 142371 over those parts of the "Right of Carriageway (created by E5950)" shown on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way 15.24 Wide (P182276)" shown on the plan.
(Private)

Lot 3 is together with a Right of Carriageway over the "Right of Way 15.24 (P182276)" shown passing through Lot 1 on the plan.
(Private)

Lot 1 is subject to a Right of Carriageway in favour of Lot 3 over the "Right of Way (private) 12.00 Wide" marked "WXYZ"

Lot 3 is together with a Right of Carriageway over the "Right of Way (private) 12.00 Wide" marked "WXYZ" shown passing through Lot 1 on the plan.

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(USE ANNEXURE PAGES FOR CONTINUATION)

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* Amelia Kate Goss 11/11/24
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ANNEXURE TO SCHEDULE OF EASEMENTS PAGE 2 OF 2 PAGES	Registered Number SP 187534
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EXECUTED by **TANKRIS PTY LTD** (ACN 009 573 899) as the registered proprietor of the property comprised in Folio of the Register Volume 182276 Folio 1 in accordance with Section 127 of the Corporations Act 2001:

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Development Drawings

Appendix B

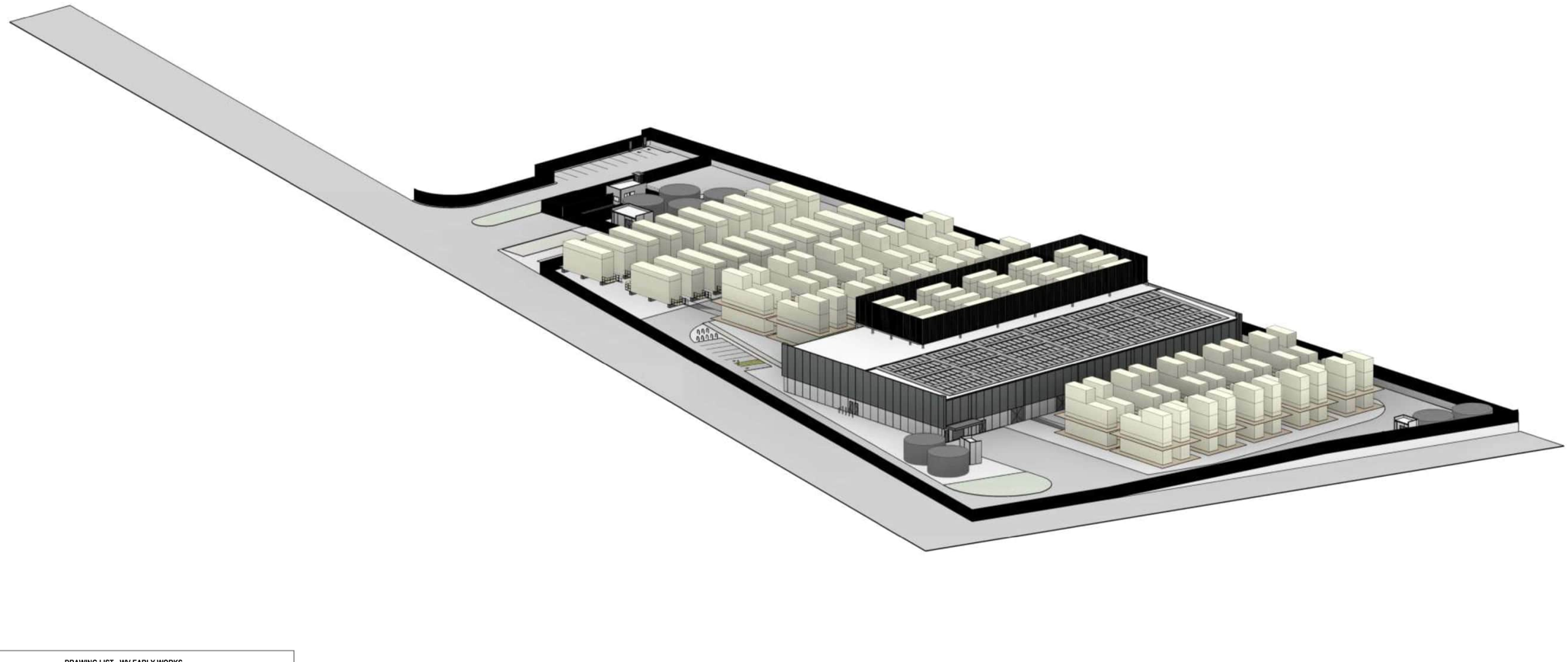
pitt&sherry

WESLEY VALE

226 MILL RD, WESLEY VALE, TASMANIA

ISSUED FOR DEVELOPMENT APPLICATION

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Planning Administration
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DRAWING LIST - WV EARLY WORKS			
DRAWING NUMBER	DRAWING NAME	CURRENT REVISION	Current Revision Date
00	COVER SHEET	B	07/07/26
01	LOCATION PLAN	B	07/07/26
02	SITE CONTEXT PLAN	B	07/07/26
03	LAND ADJACENCIES CONTEXT & CONSTRAINTS	B	07/07/26
04	PROPOSED SITE PLAN	B	07/07/26
05	GFA PLANS & CALCULATIONS	B	07/07/26
06	SCHEMATIC WATER SUPPLY PLAN	B	07/07/26
07	SCHEMATIC SEWER PLAN	B	07/07/26
08	SCHEMATIC PROCESS & DISTRIBUTION PLAN	B	07/07/26
09	SCHEMATIC ROOF RAINWATER COLLECTION PLAN	B	07/07/26
10	SITE LIGHTNG PLAN	B	07/07/26
11	FIRE & HYDRANT PLAN	B	07/07/26
12	SCHEMATIC STORMWATER LAYOUT	B	07/07/26
20	BUILDING FLOOR PLAN - GROUND LEVEL	B	07/07/26
21	BUILDING FLOOR PLAN - ROOF LEVEL	B	07/07/26
30	BUILDING ELEVATIONS	B	07/07/26
40	BUILDING SECTIONS	B	07/07/26
41	SITE SECTIONS	B	07/07/26
55	GUARD HOUSE PLANS & ELEVATIONS	B	07/07/26
56	FIRE PUMP HOUSE PLANS & ELEVATIONS	B	07/07/26
62	VISUALISATIONS - SHEET 2	B	07/07/26
71	SHADOW STUDIES	B	07/07/26
72	SHADOW STUDIES	B	07/07/26

Total: 23

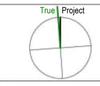
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+61 2 9956 2666 | hdrinc.com
HDR Pty. Limited ABN 76 158 075 220 trading as HDR

NOMINATED ARCHITECTS & REGISTRATIONS
NSW Huai Lim 16065, D. Joe Mihaljevic 8699, Simon Fleet 8363
VIC HDR Pty Ltd 51752
ACT Huai Lim 16065

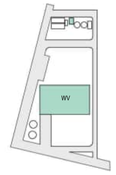
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A	ISSUED FOR DRAFT DA	29/05/26	HDR	FIRMUS
B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS

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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
COVER SHEET

SCALE @ A1
PROJECT NUMBER 10463896
DRAWING NUMBER **00**
ISSUE **B**

PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 **LOCATION PLAN**
1 : 3500

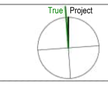
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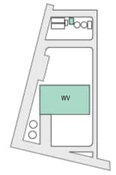
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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
LOCATION PLAN

SCALE
PROJECT NUMBER
10463896
DRAWING NUMBER
01
ISSUE
B

PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION
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1 **SITE CONTEXT PLAN**
1 : 1000

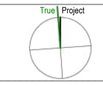
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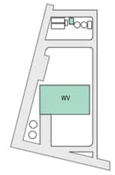
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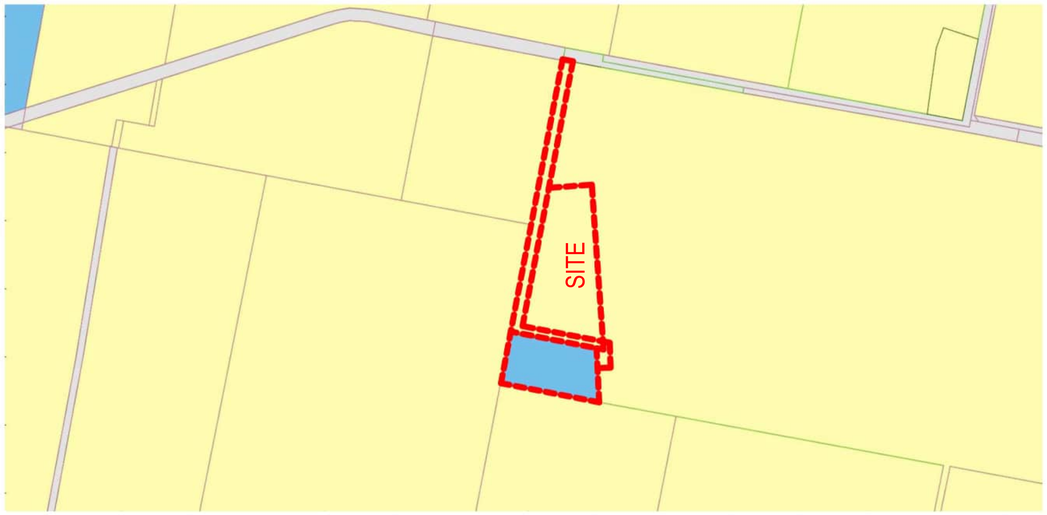
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SITE CONTEXT PLAN

SCALE
1 : 1000 @ A1
PROJECT NUMBER
10463896
DRAWING NUMBER
02
ISSUE
B
PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 LAND TENURE
1 : 2

LEGEND

Boundary Lines	*Land Tenure*
Coordinated Survey Data	Private Freehold
Accurate Replot Data	Authority Crown / Freehold
Original Map Data	



2 WATERWAY AND COASTAL PROTECTION AREAS
1 : 2

LEGEND

Boundary Lines	*Waterway & Coastal Protection Area*
Coordinated Survey Data	Wetland Area
Accurate Replot Data	
Original Map Data	



3 LANDSLIDE DAMAGE
1 : 2

LEGEND

Boundary Lines	*Landslide Planning Map*
Coordinated Survey Data	Low
Accurate Replot Data	Medium
Original Map Data	High



4 ELEC TRAMISSION PROTECTIONS OVERLAY
1 : 2

LEGEND

Boundary Lines	*Electricity Infrastructure Protection Overlay*
Coordinated Survey Data	Communications Station Buffer Area
Accurate Replot Data	Substation Facility Buffer Area
Original Map Data	Substation Facility
	Electricity Transmission Corridor

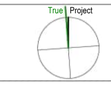
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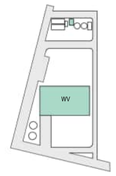
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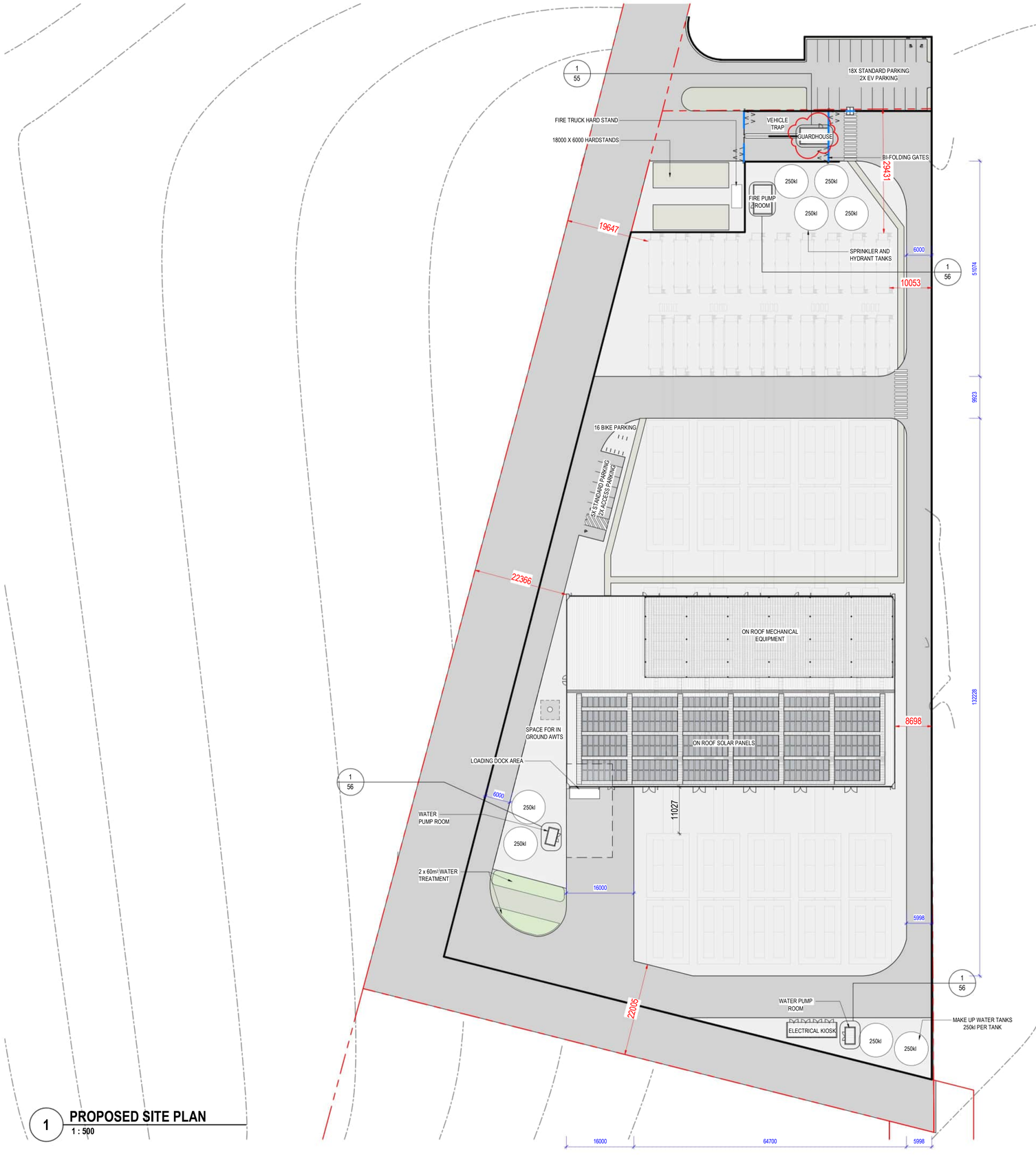
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WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
LAND ADJACENCIES CONTEXT & CONSTRAINTS

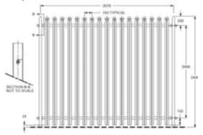
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10463896
DRAWING NUMBER
03
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PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 **PROPOSED SITE PLAN**
1 : 500





PERIMETER FENCE SPECS:

FENCE
TRIPLE-POINTED (W-SPIKE) PALISADE.
MINIMUM HEIGHT: 3.0M ABOVE GROUND (INC. CONCRETE BASE).
FIXED INTO REINFORCED CONCRETE BASE OF A MINIMUM 500MM HEIGHT.
ANTI-DIG FEATURE EXTENDING AT LEAST 200MM BELOW GROUND (IF NOT FIXED INTO CONCRETE BASE).
ANTI-CLIMB.

MATERIAL
HOT-DIP GALVANIZED STEEL OR POWDER-COATED FOR CORROSION RESISTANCE.
GAP BETWEEN VERTICAL PALES <60MM.
GAP BETWEEN PALE AND POST <10MM.
GAP BETWEEN CONCRETE BASE AND BOTTOM OF PALE <10MM.
ANTI-TAMPER AND ANTI-CUT FIXINGS.

POSTS
INTERMEDIATE POSTS: 120MM X 80MM RECTANGULAR HOLLOW SECTION (RHS).
CORNER POSTS: 120MM X 120MM RHS.
POST CENTRES: 2.75M.

FENCE LINE
NO CURVED FENCELINES OF CONCEALED AREAS THAT IMPACT ABILITY FOR EFFECTIVE CCTV / VIDEO SURVEILLANCE COVERAGE.

SECURITY SYSTEMS
CAPABLE OF INTEGRATING A PERIMETER INTRUDER DETECTION SOLUTION.
100% BY CCTV / VIDEO SURVEILLANCE OF FENCELINE (CCTV TRACE TO BE PROVIDED).
SYSTEMS INFRASTRUCTURE TO BE ON SECURE SIDE (SPECIFICATIONS TO BE PROVIDED FOR SECURING).

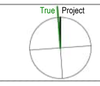
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+61 2 9956 2666 | hdrinc.com
HDR Pty. Limited ABN 76 158 075 220 trading as HDR

NOMINATED ARCHITECTS & REGISTRATIONS
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VIC HDR Pty Ltd 51752
ACT Huai Lim 16065

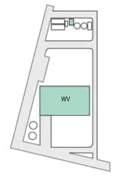
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NORTH POINT



KEY PLAN



REV	DESCRIPTION OF CHANGE	DATE	CHECKED	ISSUED TO
A	ISSUED FOR DRAFT DA	29/05/26	HDR	FIRMUS
B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS

LEGEND

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EV	EV - ELECTRICAL VEHICLE	2 SPACES
ACCESSIBLE	ACCESSIBLE	2 SPACES
	STANDARD	23 SPACES
	TOTAL	**27 SPACES**
	BIKE PARKING	16 SPACES

CLIENT

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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
PROPOSED SITE PLAN

SCALE
As indicated @ A1

PROJECT NUMBER
10463896

DRAWING NUMBER
04

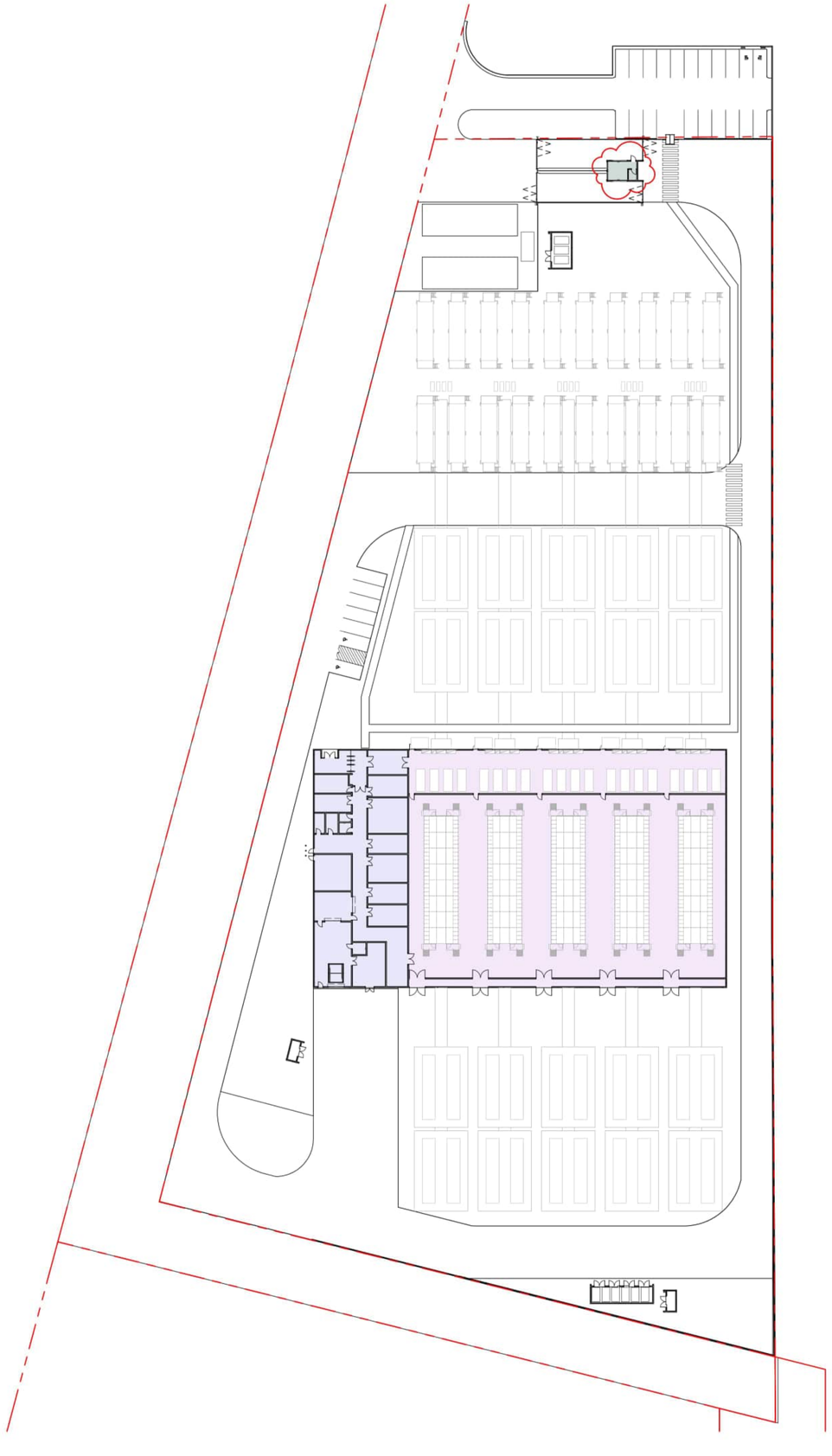
ISSUE
B

PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

7/07/2026 5:41:48 PM

Autodesk Docs://10463896 Firmus_AU Wesley Vale_DP2019/FIR-HDR-A4DCWV-BUILDING DA.rvt

0 12.5 25 50



1 GFA PLAN - BUILDING
1 : 500

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Date Advertised: 26-08-2026 **Ref. Number:** L-DA066/2026

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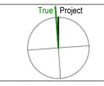
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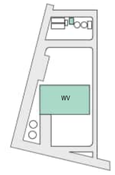
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KEY PLAN



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A	ISSUED FOR DRAFT DA	29/05/26	HDR	FIRMUS
B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS

AREA SCHEDULE

ADMINISTRATION

OCCUPANCY	*ROOMS*	*AREA*
BUILDING 1	21	793m²
GUARDHOUSE	2	20m²
TOTAL	23	813m²

TECHNICAL

OCCUPANCY	*ROOMS*	*AREA*
BUILDING 1	3	2,689m²
TOTAL	3	2,689m²
GRAND TOTAL	**26**	**3,502m²**

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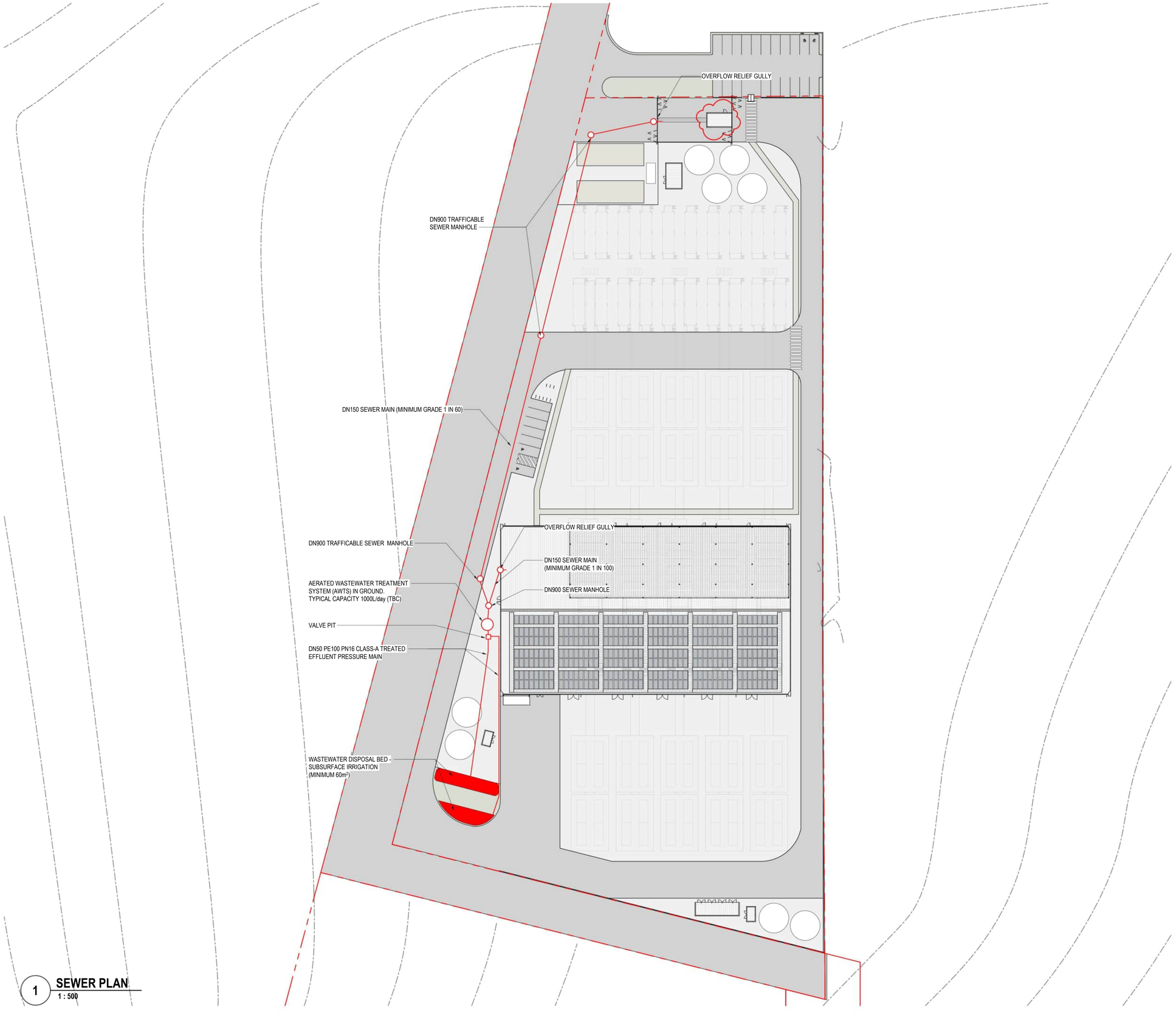
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
GFA PLANS & CALCULATIONS

SCALE: As indicated @ A1
PROJECT NUMBER: 10463896
DRAWING NUMBER: **05**
ISSUE: **B**
PROJECT STATUS: **ISSUED FOR DEVELOPMENT APPLICATION**

7/07/2026 5:41:50 PM

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1 **SEWER PLAN**
1 : 500

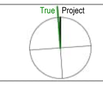
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VIC HDR Pty Ltd 51752
ACT Huai Lim 16065

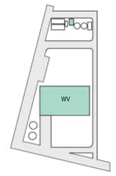
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AWTS AND DISPOSAL BED SHOULD BE MINIMUM 1.5M AWAY FROM BUILDINGS AND OTHER IN-GROUND SERVICES

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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

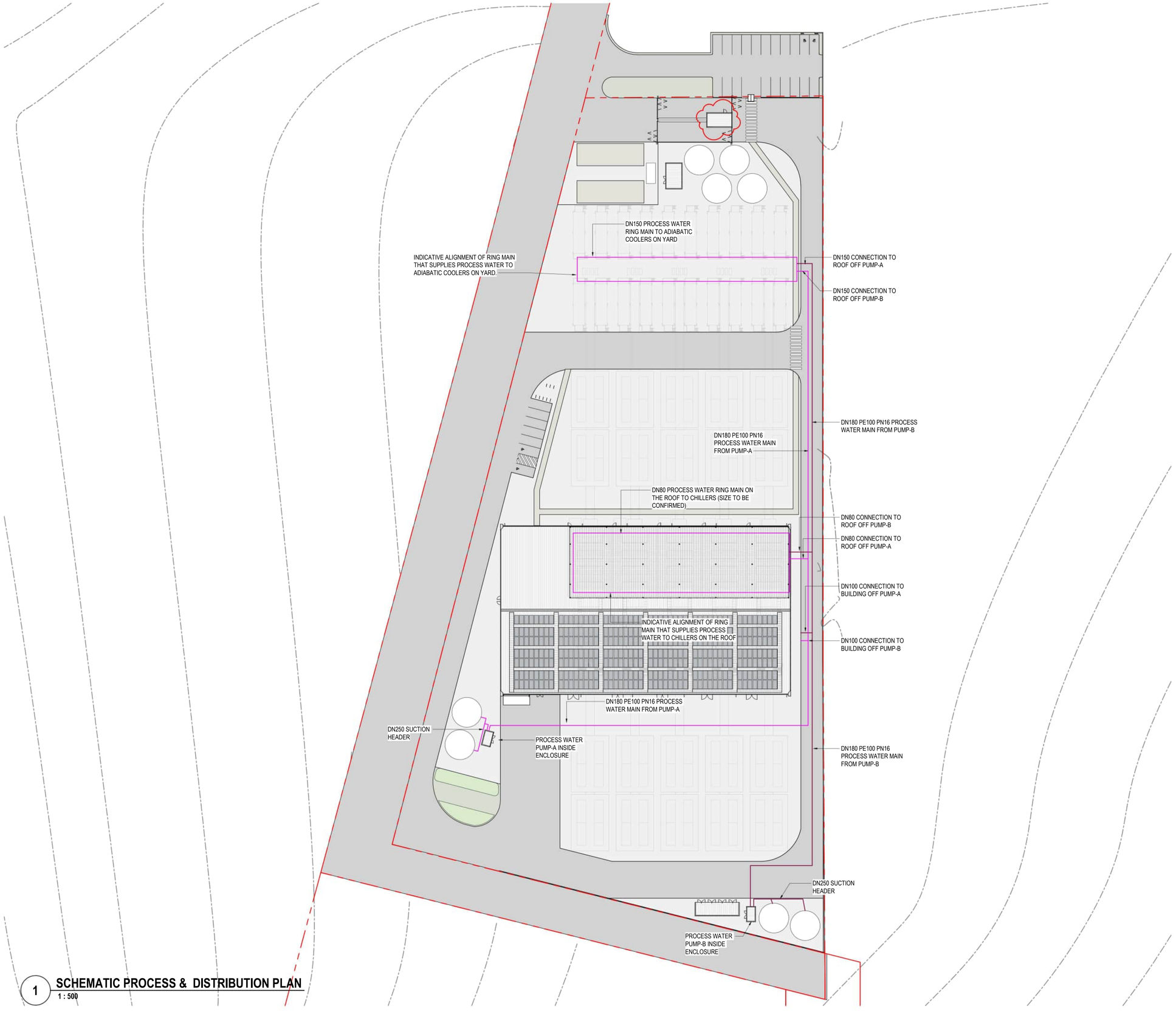
DRAWING TITLE
SCHEMATIC SEWER PLAN

SCALE
1 : 500 @ A1
PROJECT NUMBER
10463896
DRAWING NUMBER
07
ISSUE
B

PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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Autodesk Docs://10463896 Firmus_AU Wesley Vale_DP001/FR-HDRARC-W-BUILDING DA.rvt



0 12.5 25 50

1 SCHEMATIC PROCESS & DISTRIBUTION PLAN
1 : 500

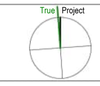
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ACT Huai Lim 16065

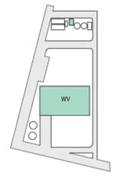
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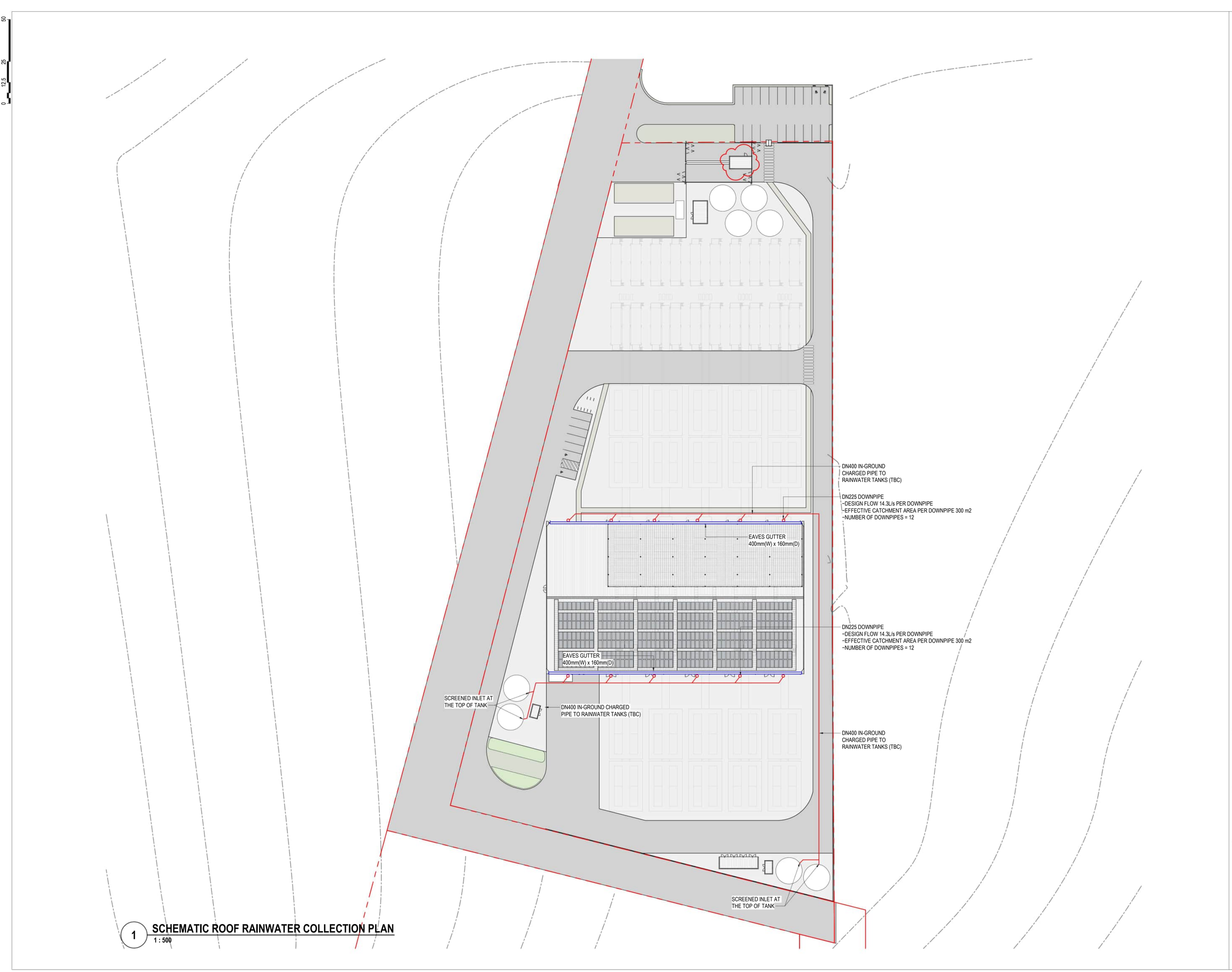
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SCHEMATIC PROCESS & DISTRIBUTION PLAN

SCALE
1 : 500 @ A1
PROJECT NUMBER
10463896
DRAWING NUMBER
08
ISSUE
B
PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 **SCHEMATIC ROOF RAINWATER COLLECTION PLAN**
1 : 500

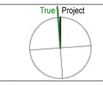
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ACT Huai Lim 16065

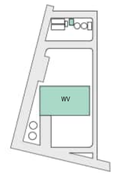
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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SCHEMATIC ROOF RAINWATER COLLECTION PLAN

SCALE
1 : 500 @ A1

PROJECT NUMBER
10463896

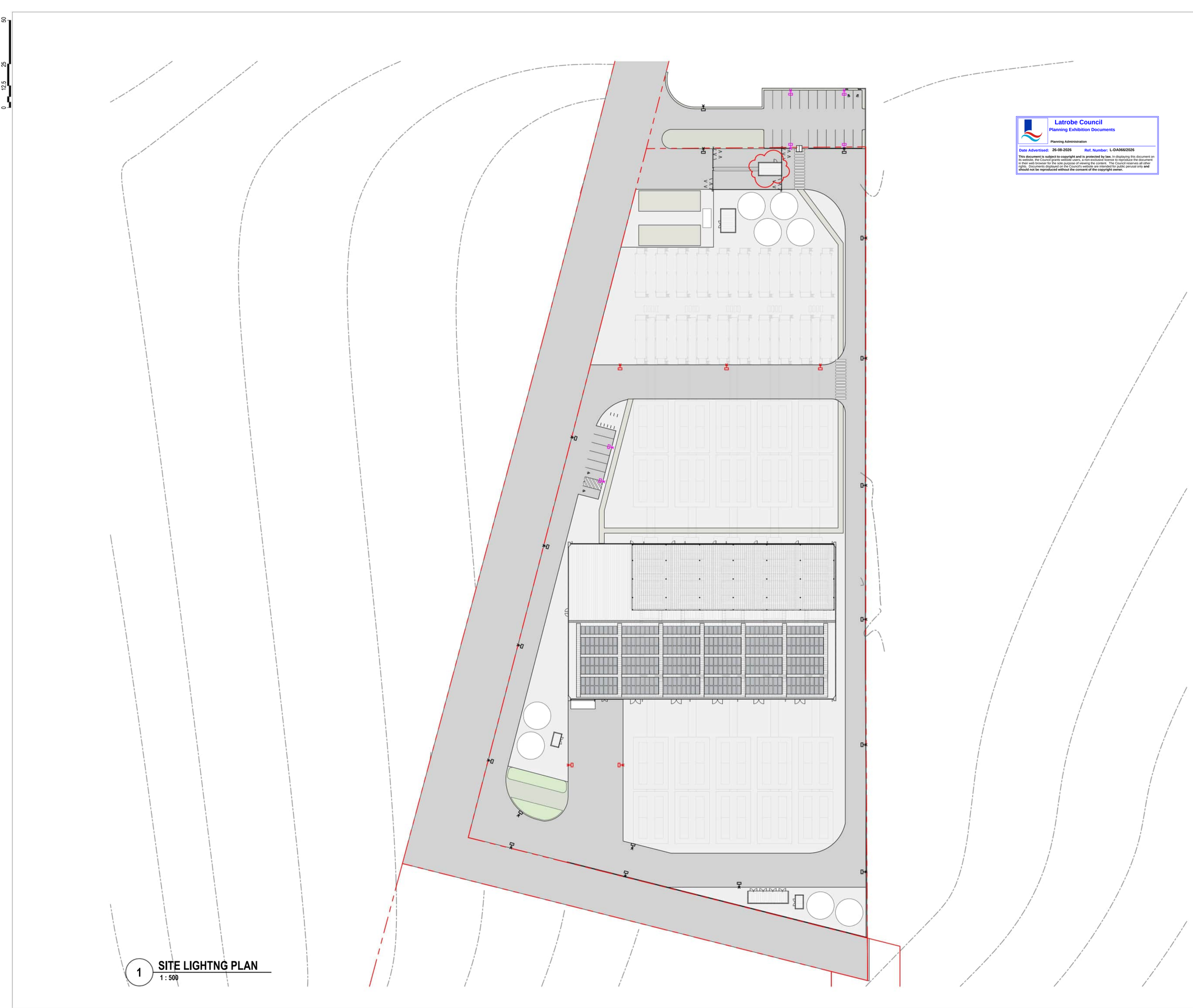
DRAWING NUMBER
09

ISSUE
B

PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 SITE LIGHTNG PLAN
1 : 500

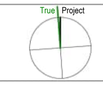
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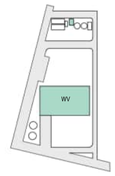
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DESIGN NOTES

1. EXTERNAL LIGHT FITTING LOCATIONS ARE INDICATIVE ONLY. TO BE FINALISED IN DETAILED DESIGN STAGE.

LEGEND

PL1 6m POLE MOUNTED LUMINAIRE 3000K 30W 4450lm. I-TRON ZERO 5PS S05 7030_040-4M
PL2 6m POLE MOUNTED LUMINAIRE 3000K 72W 10860lm. I-TRON ZERO 5PS STU-M 7030_100-4M
PL3 6m POLE MOUNTED LUMINAIRE 3000K 72W 10610lm. I-TRON ZERO 5PS S05 7030_100-4M

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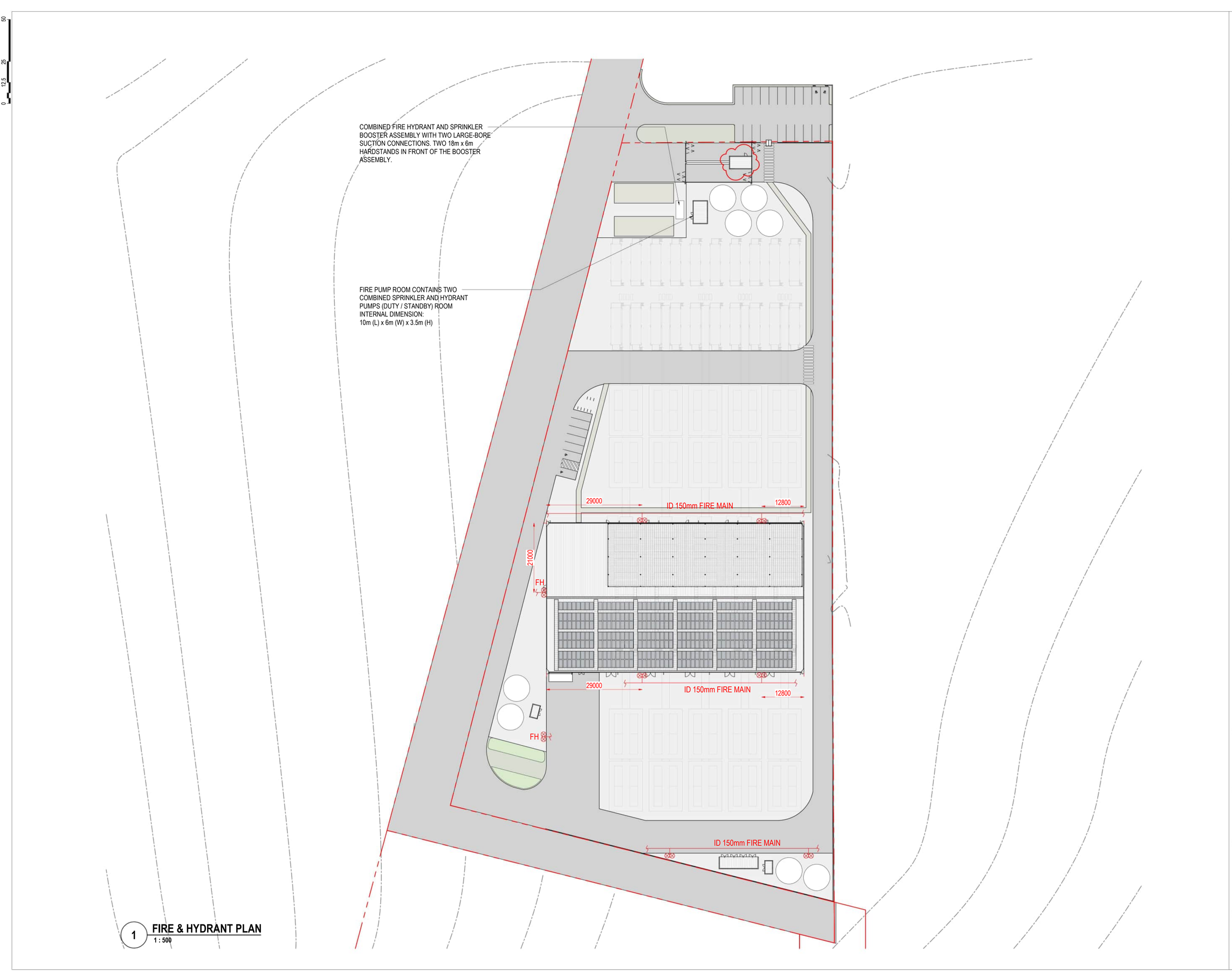
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SITE LIGHTNG PLAN

SCALE: As indicated @ A1
PROJECT NUMBER: 10463896
DRAWING NUMBER: **10**
ISSUE: **B**
PROJECT STATUS: **ISSUED FOR DEVELOPMENT APPLICATION**

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1 **FIRE & HYDRANT PLAN**
1 : 500

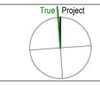
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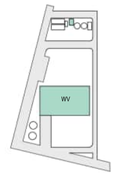
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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
FIRE & HYDRANT PLAN

SCALE 1 : 500 @ A1
PROJECT NUMBER 10463896
DRAWING NUMBER **11**
ISSUE **B**

PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 **SCHEMATIC STORMWATER LAYOUT**
1 : 500

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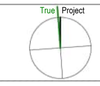
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VIC HDR Pty Ltd 51752
ACT Huai Lim 16065

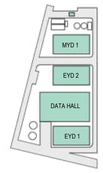
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A	ISSUED FOR DRAFT DA	29/05/26	HDR	FIRMUS
B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS
C	ISSUED FOR DA AMENDMENT	20/08/26	HDR	FIRMUS

LEGEND
- SURFACE DRAIN (SD)
- STORMWATER PIPING (SW)
- GRATED DRAIN

NOTE:
HYDRAULIC LINE WORK AND INFORMATION SHOWN IS INDICATIVE AND HAS BEEN PROVIDED FOR DESIGN COORDINATION ONLY. FINAL GEOMETRY, DETAILS, AND SPECIFICATIONS WILL BE CONFIRMED DURING SUBSEQUENT DESIGN STAGES

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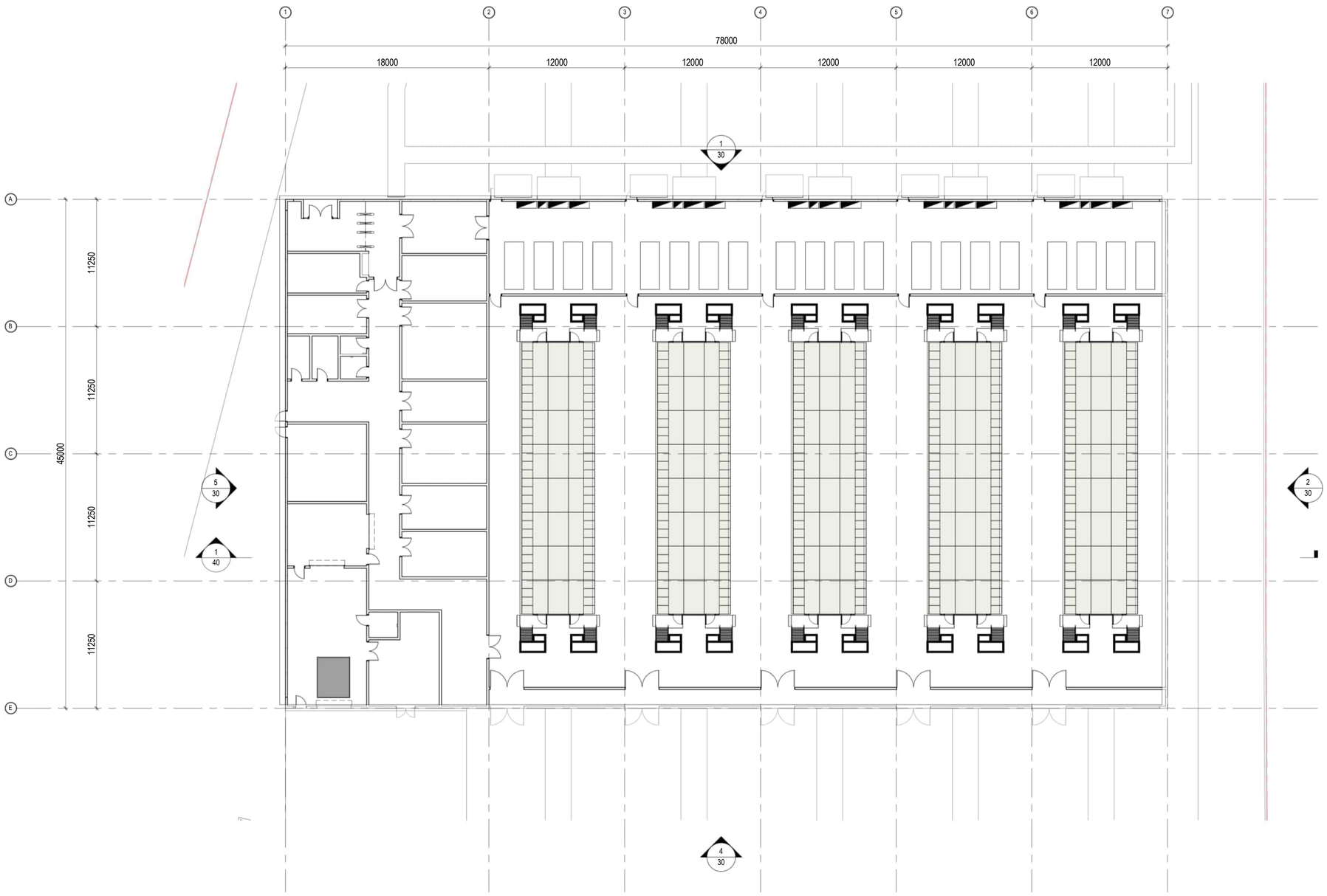
firmus

PROJECT
FIRMUS WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SCHEMATIC STORMWATER LAYOUT

SCALE 1 : 500 @ A1
PROJECT NUMBER 10463896
DRAWING NUMBER **12**
ISSUE **C**
PROJECT STATUS **ISSUED FOR INFORMATION**
20/08/2026 11:38:24 AM

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1 BUILDING GROUND LEVEL PLAN

1 : 200

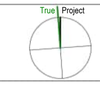
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VIC HDR Pty Ltd 51752
ACT Huai Lim 16065

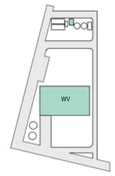
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B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS

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PROJECT

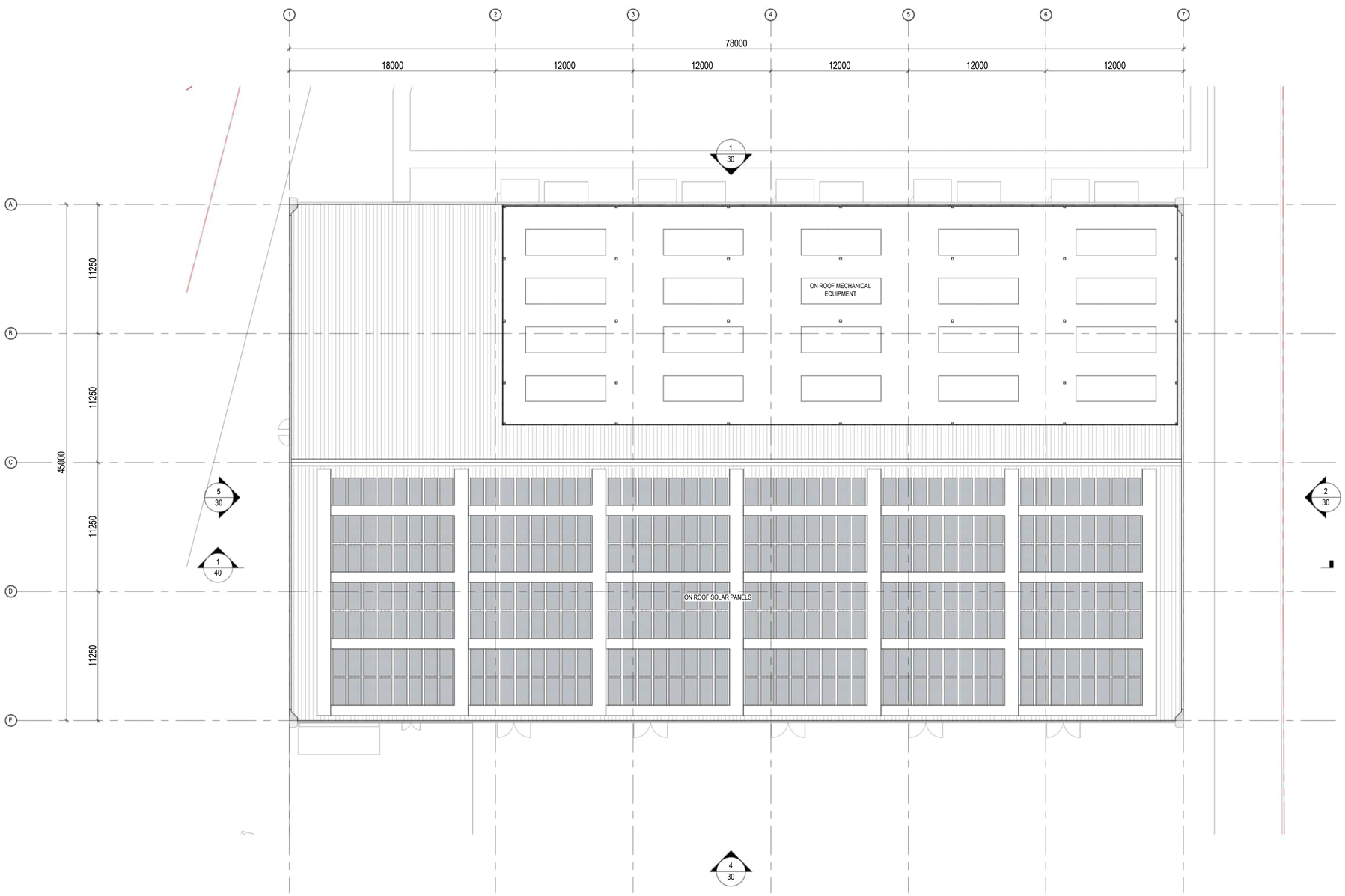
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE

BUILDING FLOOR PLAN - GROUND LEVEL

SCALE: 1 : 200 @ A1
PROJECT NUMBER: 10463896
DRAWING NUMBER: **20**
ISSUE: **B**
PROJECT STATUS: **ISSUED FOR DEVELOPMENT APPLICATION**
7/07/2026 5:42:16 PM

Autodesk Docs://10463896_Firmus_AU_Wesley_Vale_DP001/FIR-HDR-ARC-WV-BUILDING_DA.rvt



1 **BUILDING ROOF LEVEL**
1 : 200

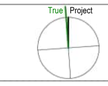
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VIC HDR Pty Ltd 51752
ACT Huai Lim 16065

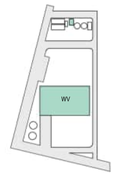
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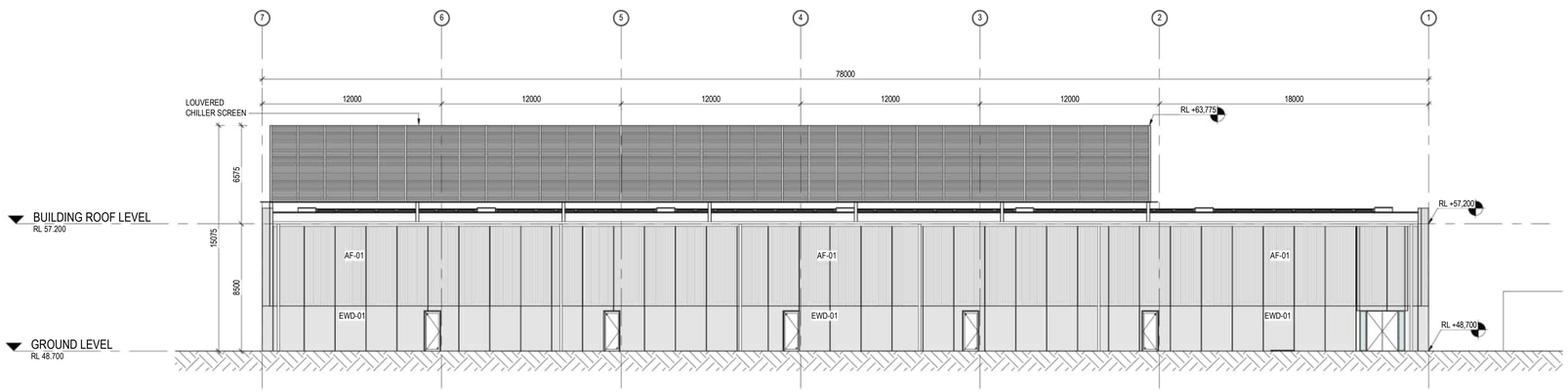
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
BUILDING FLOOR PLAN - ROOF LEVEL

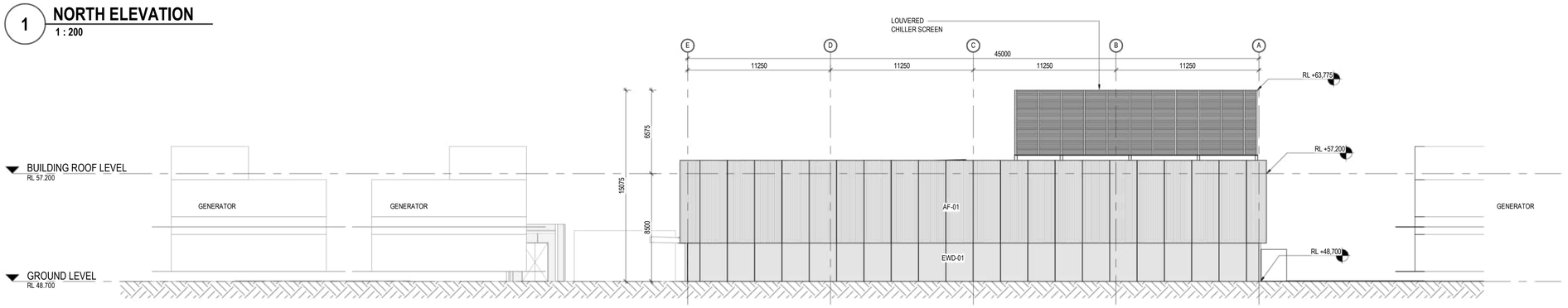
SCALE
1 : 200 @ A1
PROJECT NUMBER
10463896
DRAWING NUMBER
21
ISSUE
B
PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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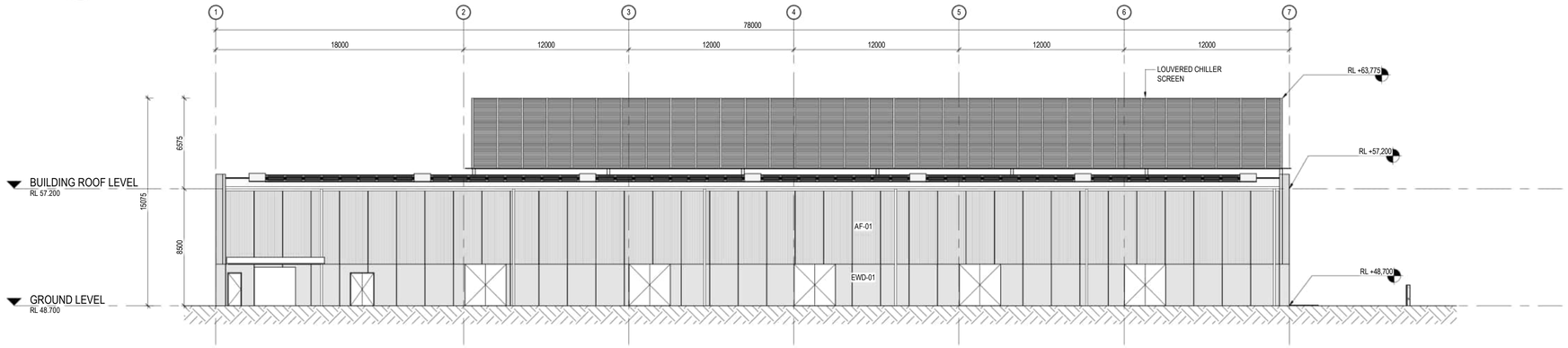
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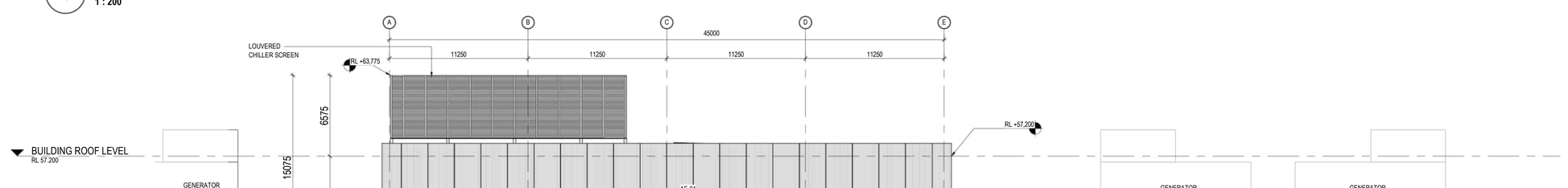
1 NORTH ELEVATION
1 : 200



2 EAST ELEVATION 01
1 : 200



4 SOUTH ELEVATION
1 : 200



5 WEST ELEVATION 02
1 : 200

MATERIAL LEGEND:

EWD-01
PRECAST CONCRETE - SMOOTH
SURFACE TO BE UNIFORM IN TEXTURE & FREE FROM SURFACE IMPERFECTIONS. CONCRETE SEALANT ADDED TO CONCRETE MIX. ADDITIONAL SURFACE FINISH: AF-01

AF-01
RECKLI 2/48 RUHR TEXTURED FORMLINER
FINISH APPLIED ON EWD-01. PATTERN TO BE CONSISTENT ACROSS PANELS WITH ALIGNED JOINTS AS REQUIRED. ENSURE MOULDS ARE CLEAN & FREE OF DEFECTS TO ACHIEVE A UNIFORM ARCHITECTURAL SURFACE. COORDINATE WITH STRUCTURAL & PRECAST MFR FOR PANEL SIZE, JOINT LAYOUT, & MOULD HANDLING.

ERD-01
METAL DOWNPIPE
COLORBOND DOWNPIPE, MONUMENT COLOUR (GUTTER AND DOWNPIPE)

EWG-01
GLAZING
DOUBLE GLAZED WINDOW **TBC.** TO MEET SECTION J REQUIREMENTS

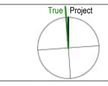
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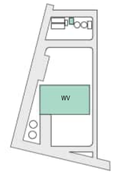
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B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS

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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
BUILDING ELEVATIONS

SCALE
As indicated @ A1

PROJECT NUMBER
10463896

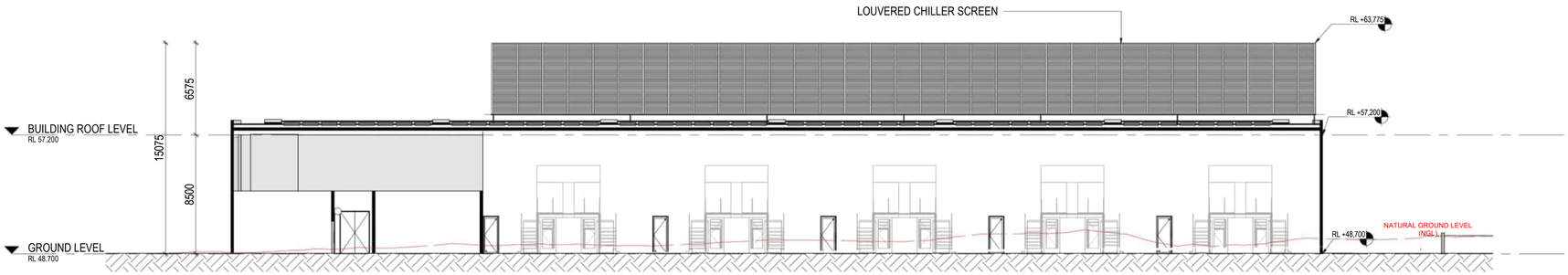
DRAWING NUMBER
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ISSUE
B

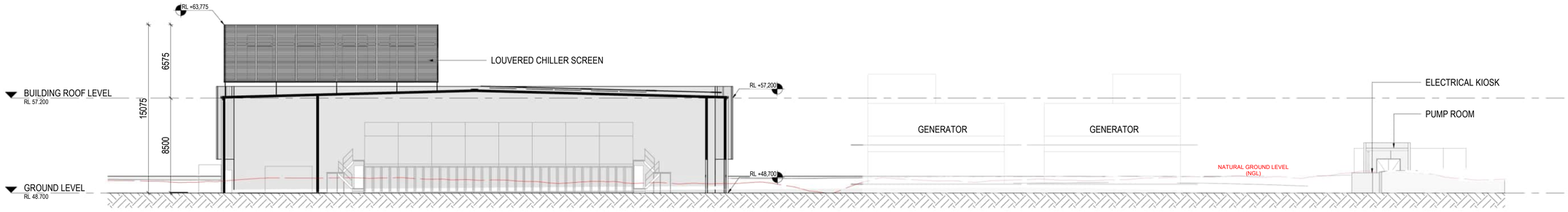
PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

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1 **BUILDING 1 NORTH - SECTION 1**
1 : 200



2 **BUILDING 1 EAST - SECTION 2**
1 : 200

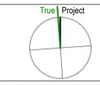
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ACT Huai Lim 16065

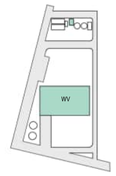
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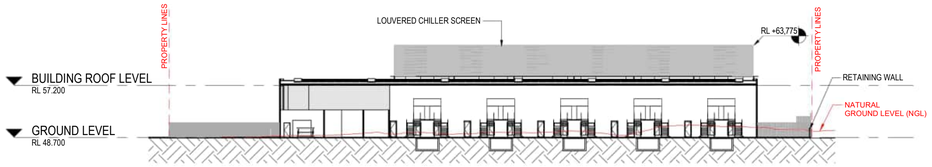
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
BUILDING SECTIONS

SCALE 1 : 200 @ A1
PROJECT NUMBER 10463896
DRAWING NUMBER **40**
ISSUE **B**
PROJECT STATUS **ISSUED FOR DEVELOPMENT APPLICATION**

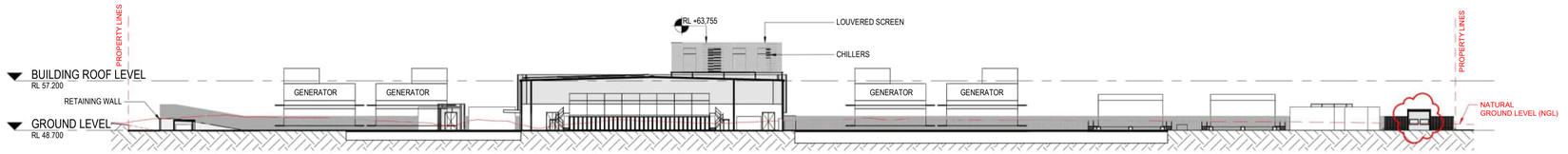
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5 SITE SECTION NORTH 1/500

1 : 500



6 SITE SECTION WEST 1/500

1 : 500

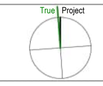
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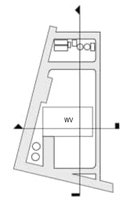
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PROJECT

WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE

SITE SECTIONS

SCALE
1 : 500 @ A1

PROJECT NUMBER
10463896

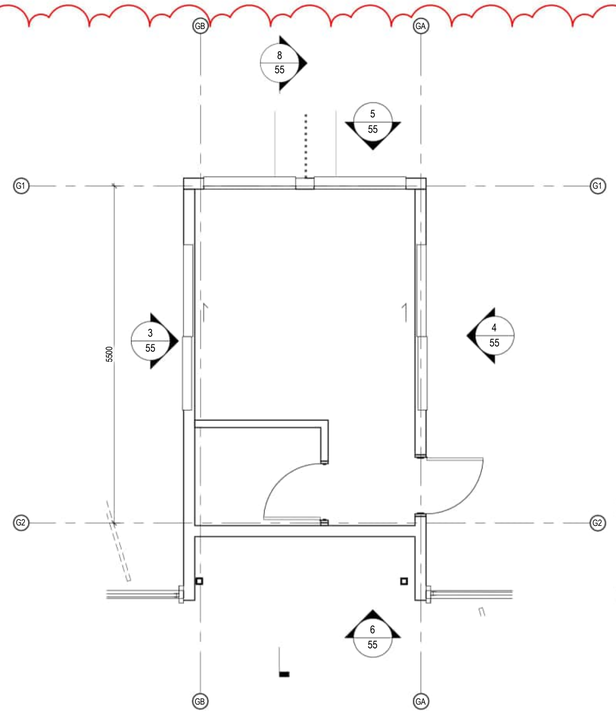
DRAWING NUMBER
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ISSUE
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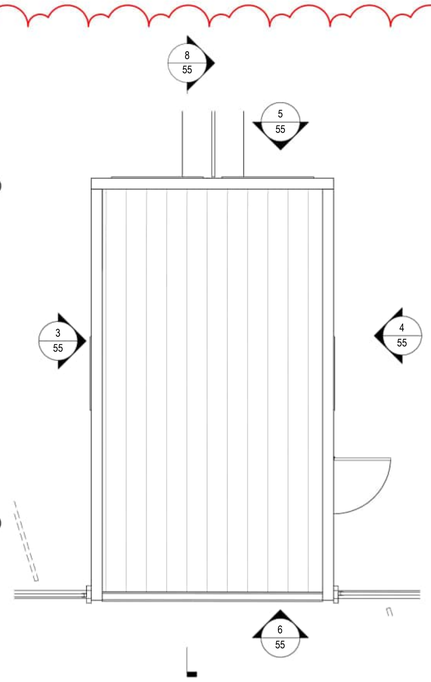
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ISSUED FOR DEVELOPMENT APPLICATION

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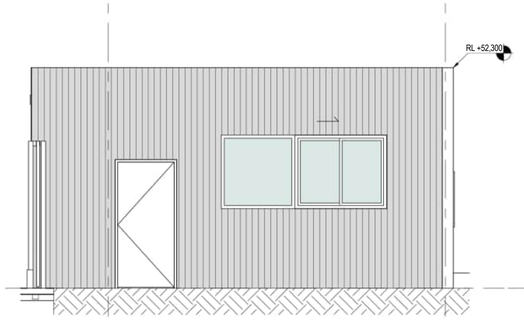
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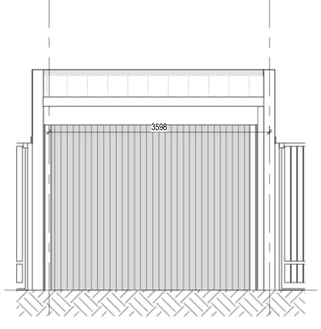
1 PLAN - GUARD HOUSE
1 : 50



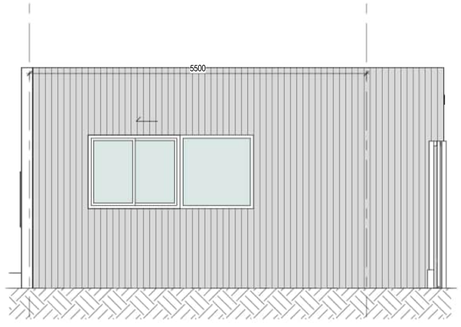
2 ROOF LEVEL - GUARDHOUSE
1 : 50



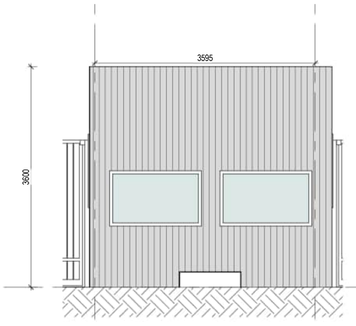
4 GUARD HOUSE - NORTH ELEVATION
1 : 50



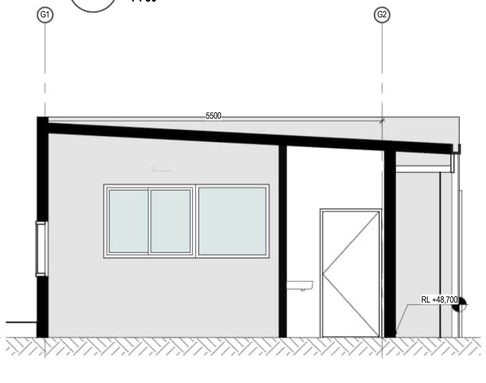
6 GUARD HOUSE - EAST ELEVATION
1 : 50



3 GUARD HOUSE - SOUTH ELEVATION
1 : 50



5 GUARD HOUSE - WEST ELEVATION
1 : 50



8 GUARDHOUSE - Section 2
1 : 50

MATERIAL LEGEND:

EWD-01
PRECAST CONCRETE - SMOOTH
SURFACE TO BE UNIFORM IN TEXTURE & FREE FROM SURFACE IMPERFECTIONS. CONCRETE SEALANT ADDED TO CONCRETE MIX.
ADDITIONAL SURFACE FINISH: AF-01

AF-01
RECKLI 2/48 RUHR TEXTURED FORMLINER
FINISH APPLIED ON EWD-01. PATTERN TO BE CONSISTENT ACROSS PANELS WITH ALIGNED JOINTS AS REQUIRED. ENSURE MOULDS ARE CLEAN & FREE OF DEFECTS TO ACHIEVE A UNIFORM ARCHITECTURAL SURFACE. COORDINATE WITH STRUCTURAL & PRECAST MFR FOR PANEL SIZE, JOINT LAYOUT, & MOULD HANDLING.

ERD-01
METAL DOWNPIPE
COLORBOND DOWNPIPE, MONUMENT COLOUR (GUTTER AND DOWNPIPE)

EWG-01
GLAZING
DOUBLE GLAZED WINDOW **TBC.** TO MEET SECTION J REQUIREMENTS

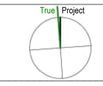
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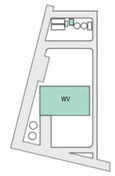
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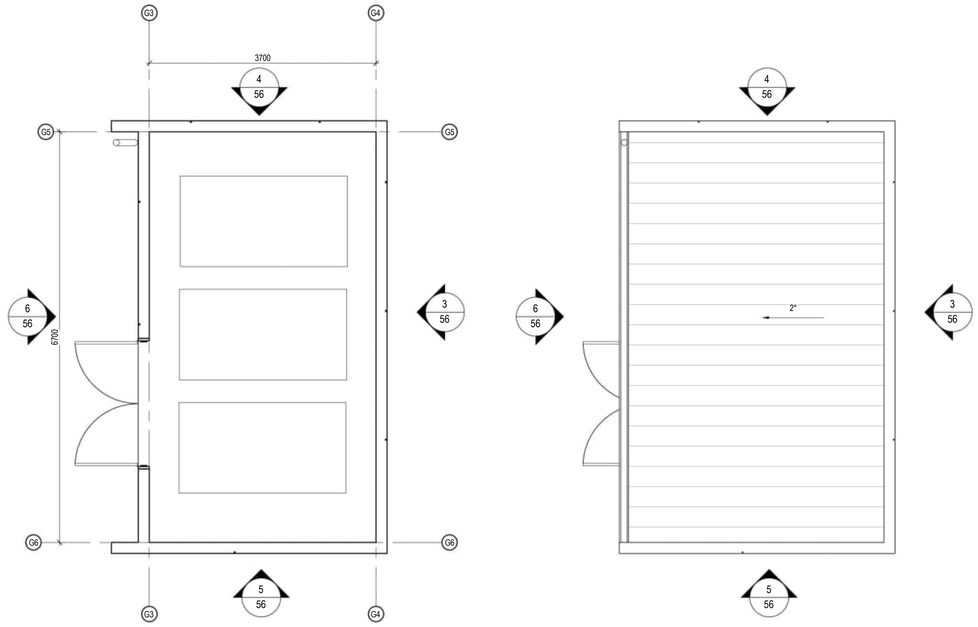
PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
GUARD HOUSE PLANS & ELEVATIONS

SCALE
As indicated @ A1
PROJECT NUMBER
10463896
DRAWING NUMBER
55
ISSUE
B
PROJECT STATUS
ISSUED FOR DEVELOPMENT APPLICATION

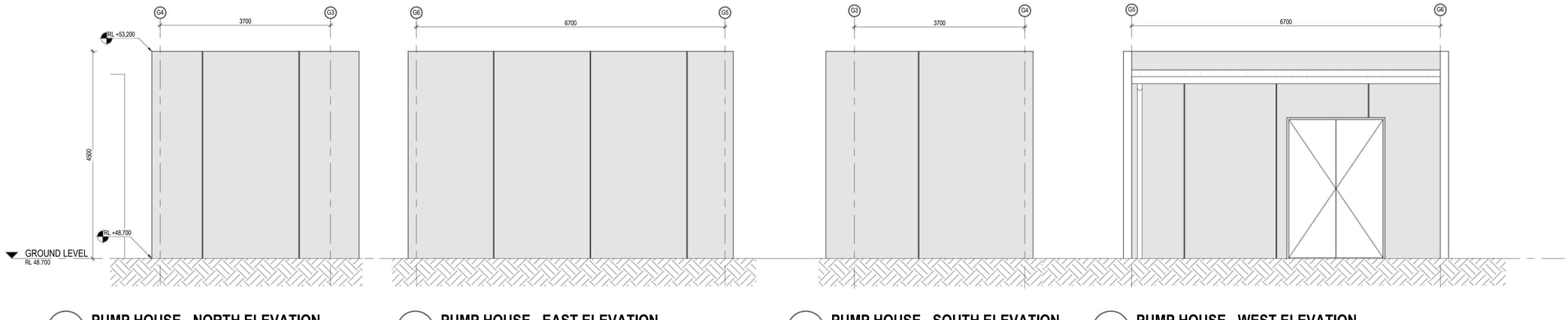
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1 GROUND PLAN - PUMP HOUSE
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2 ROOF LEVEL - PUMP HOUSE
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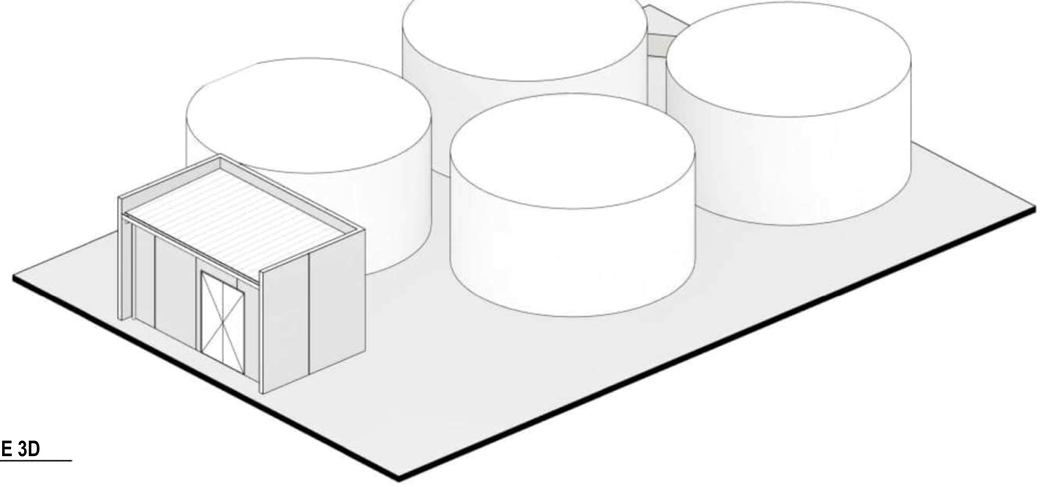


4 PUMP HOUSE - NORTH ELEVATION
1 : 50

3 PUMP HOUSE - EAST ELEVATION
1 : 50

5 PUMP HOUSE - SOUTH ELEVATION
1 : 50

6 PUMP HOUSE - WEST ELEVATION
1 : 50



9 PUMP HOUSE 3D

MATERIAL LEGEND:

EWD-01
PRECAST CONCRETE - SMOOTH
SURFACE TO BE UNIFORM IN TEXTURE & FREE FROM SURFACE IMPERFECTIONS. CONCRETE SEALANT ADDED TO CONCRETE MIX.
ADDITIONAL SURFACE FINISH: AF-01

AF-01
RECKLI 2/48 RUHR TEXTURED FORMLINER
FINISH APPLIED ON EWD-01. PATTERN TO BE CONSISTENT ACROSS PANELS WITH ALIGNED JOINTS AS REQUIRED. ENSURE MOULDS ARE CLEAN & FREE OF DEFECTS TO ACHIEVE A UNIFORM ARCHITECTURAL SURFACE. COORDINATE WITH STRUCTURAL & PRECAST MFR FOR PANEL SIZE, JOINT LAYOUT, & MOULD HANDLING.

ERD-01
METAL DOWNPIPE
COLORBOND DOWNPIPE, MONUMENT COLOUR (GUTTER AND DOWNPIPE)

EWG-01
GLAZING
DOUBLE GLAZED WINDOW **TBC.** TO MEET SECTION J REQUIREMENTS

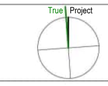
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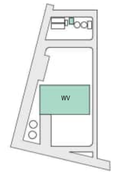
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WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
FIRE PUMP HOUSE PLANS & ELEVATIONS

SCALE: As indicated @ A1
PROJECT NUMBER: 10463896
DRAWING NUMBER: **56**
ISSUE: **B**
PROJECT STATUS: **ISSUED FOR DEVELOPMENT APPLICATION**

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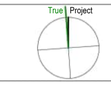
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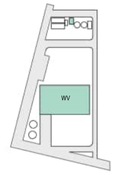
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PROJECT

WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE

VISUALISATIONS - SHEET 2

SCALE
@ A1

PROJECT NUMBER
10463896

DRAWING NUMBER
62

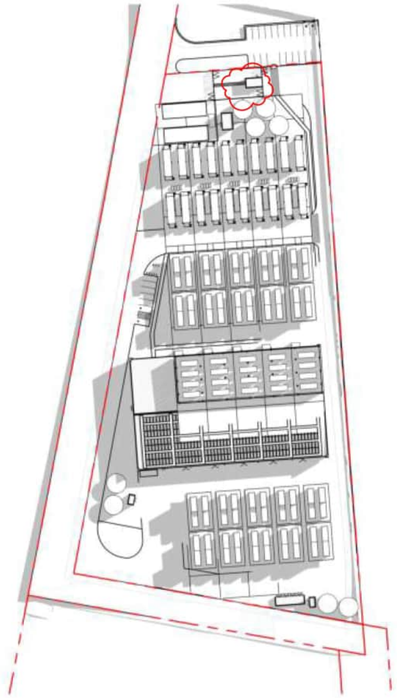
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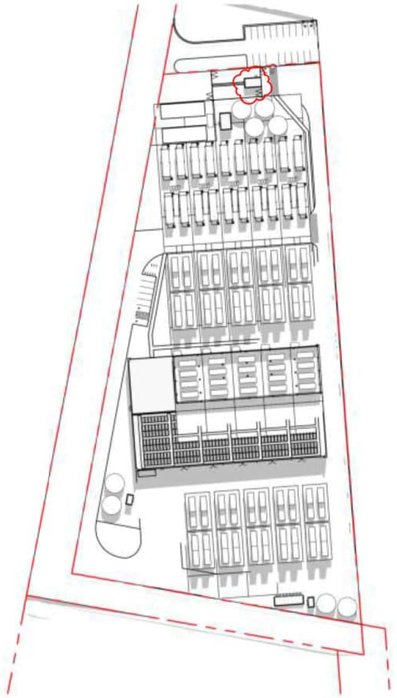
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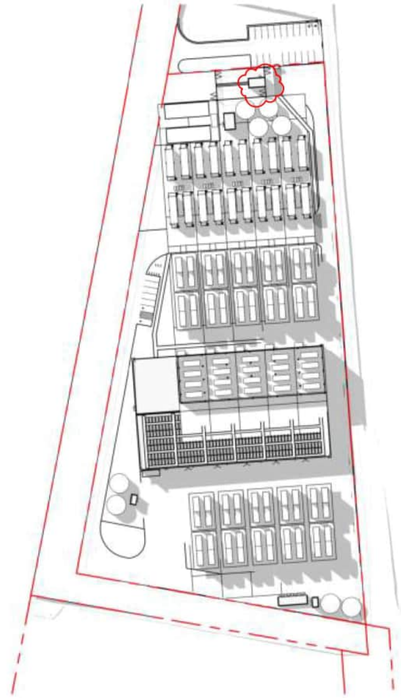
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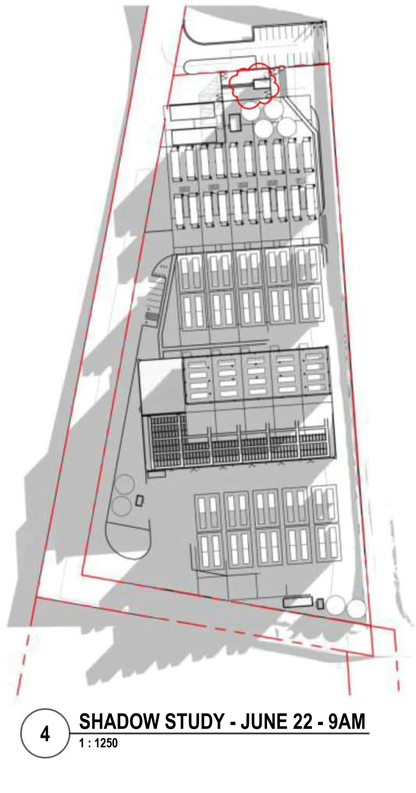
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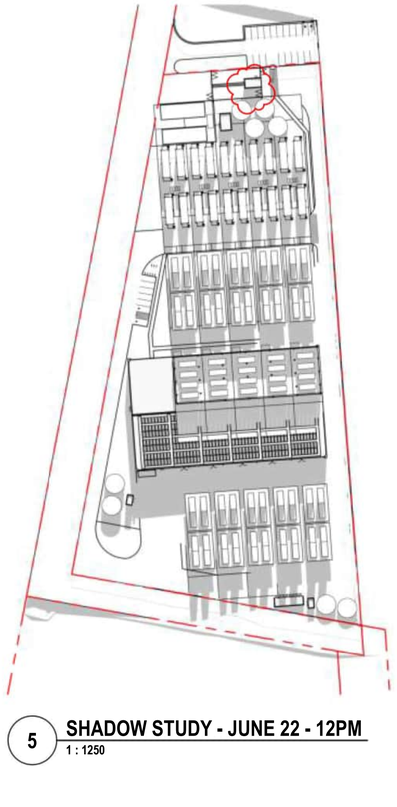
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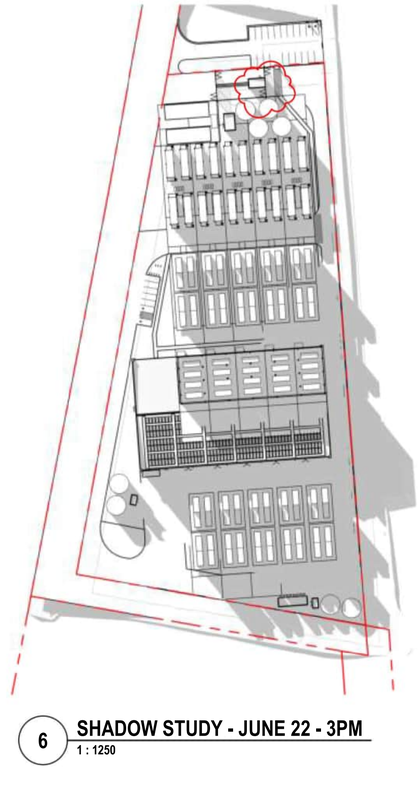
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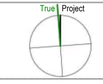
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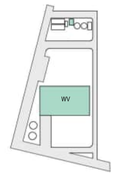
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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SHADOW STUDIES

SCALE
1 : 1250 @ A1

PROJECT NUMBER
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DRAWING NUMBER
71

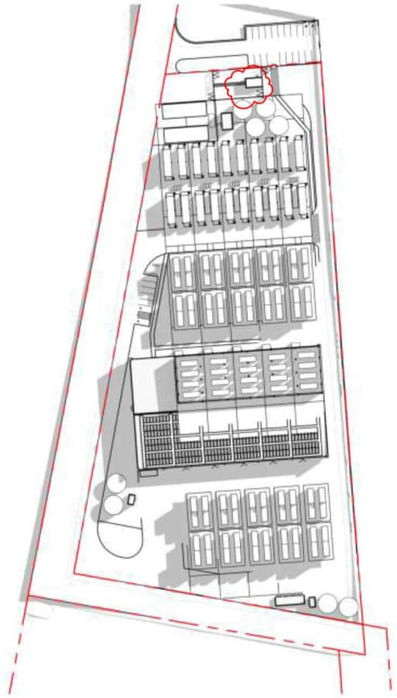
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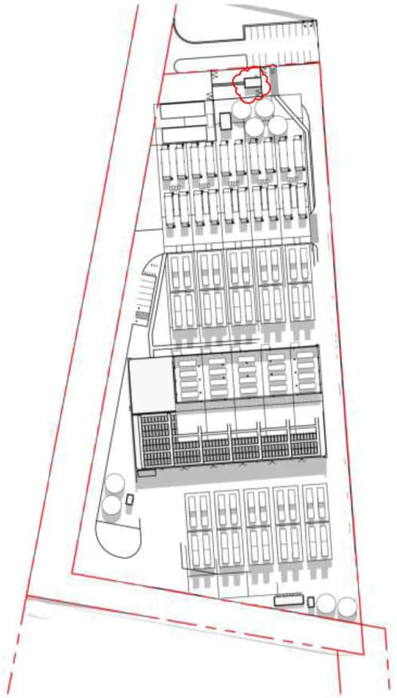
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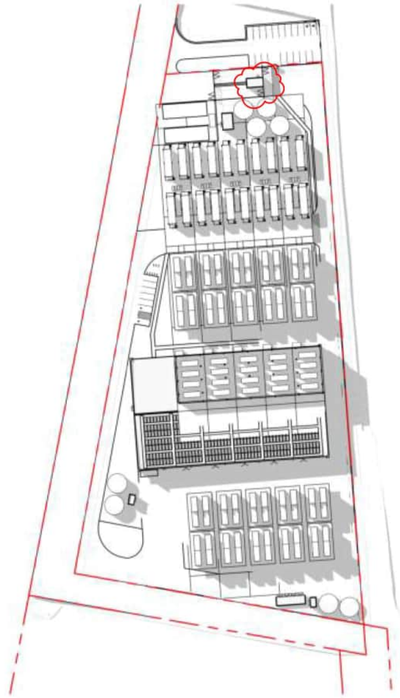
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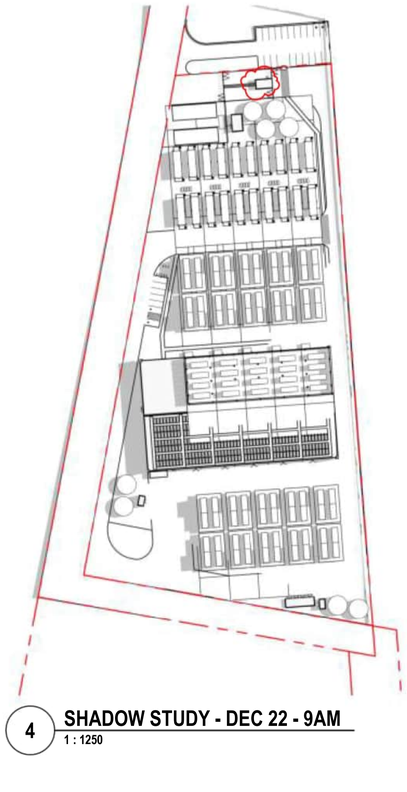
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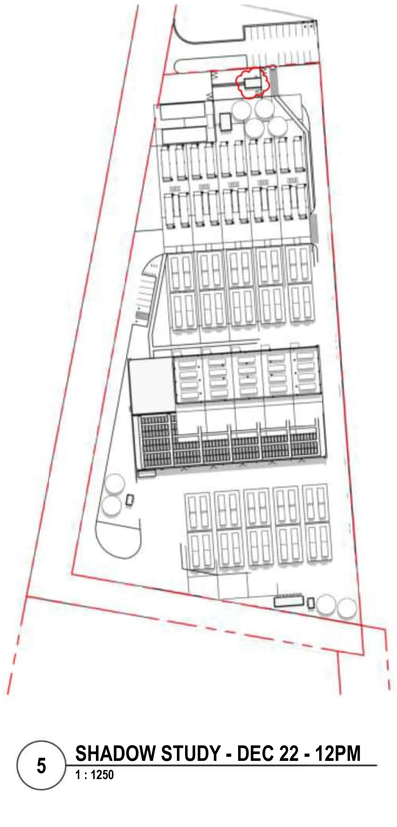
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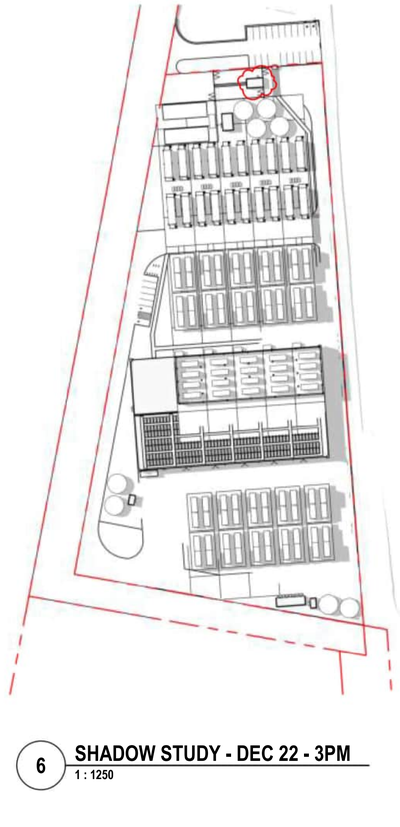
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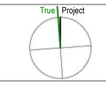
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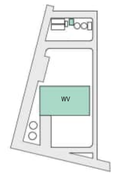
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PROJECT
WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SHADOW STUDIES

SCALE
1 : 1250 @ A1

PROJECT NUMBER
10463896

DRAWING NUMBER
72

ISSUE
B

PROJECT STATUS
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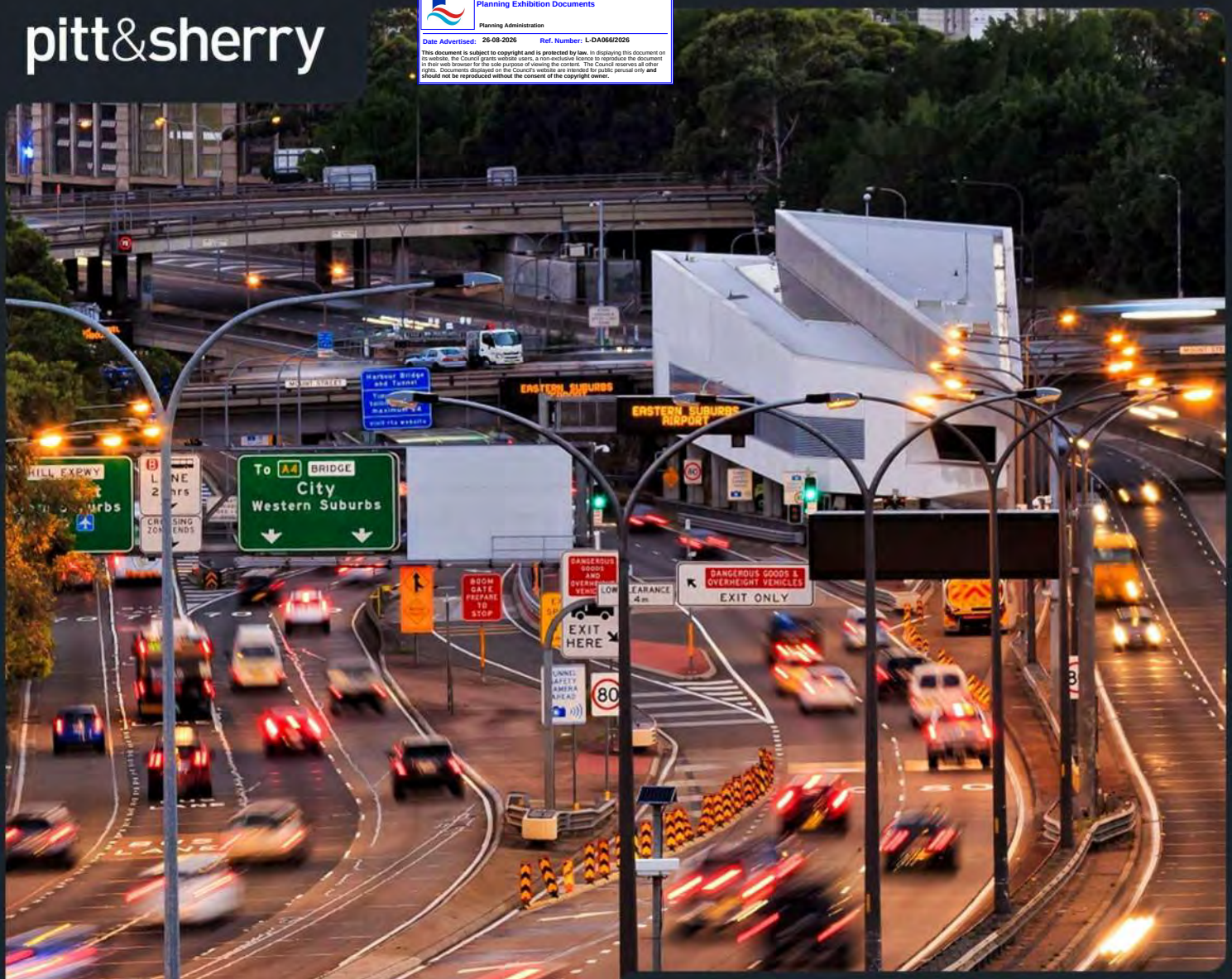
Traffic Impact Assessment

Appendix C

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pitt&sherry



Firmus – Wesley Vale

Traffic Impact Assessment

Prepared for
Firmus

Client representative
Andrew Bulls

Date
28 May 2026

Rev00

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Planning Administration
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Prepared by — Hannah Tindale-Carter		**Date —** 26 May 2026
Reviewed by — Rebekah Ramm		**Date —** 26 May 2026
Authorised by — Rebekah Ramm		**Date —** 26 May 2026

Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
00	Traffic Impact Assessment	HTC	RR	RR	26/05/26

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1. Introduction

1.1 Background and Scope

It is proposed to develop an AI factory at Wesley Vale, Tasmania.

Firmus Technologies (Firmus, the client) has engaged pitt&sherry to prepare a Traffic Impact Assessment (TIA) to address the impacts of the proposed development.

This report has been prepared with reference to the *Department of State Growth (State Growth) 's publication Traffic Impact Assessment (TIA) Guidelines and the Tasmanian Planning Scheme (Planning Scheme)*.

2. Existing Conditions

2.1 Site Location

The proposed site encompasses a portion of the land parcel at 226 Mill Road, Wesley Vale (title reference: 187534/1).

The site is located approximately 6km east of Devenport and 9km west of Port Sorell. The development site has frontages to an access road extending from Mill Road. This access road is currently owned by TasNetworks providing access to the Wesley Vale Transend Sub Station

The site has a land use classification of 19.0 General Industrial under the Planning Scheme. Surrounding land uses are predominantly classified as 19.0 General Industrial, 26.0 Utilities or 21.0 Agricultural.

Figure 1 shows the site location in the local context and the land use classification zoning in the vicinity of the site.

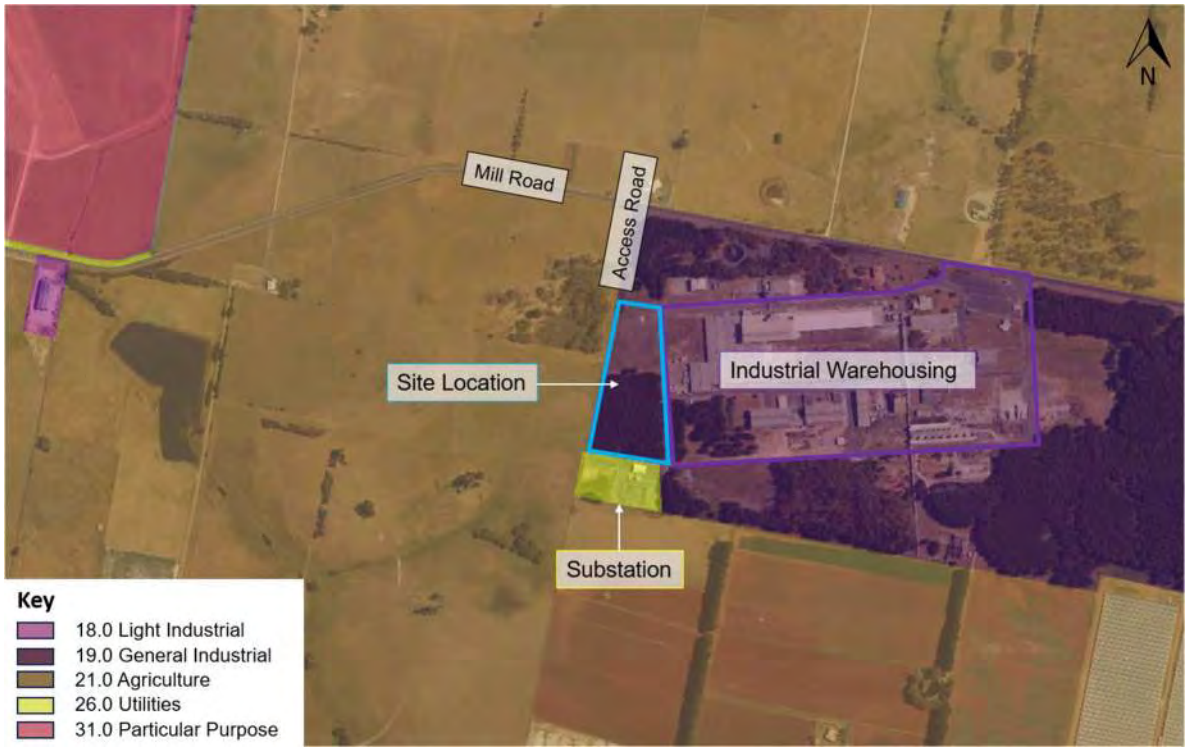


Figure 1. Site Location

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2.2 Existing Operation

The 226 Mill Road land parcel includes the industrial warehousing area that was formerly the Wesley Vale Pulp Mill that operated from 1969 to 2010. However, the specific site location is currently undeveloped.

2.3 Surrounding Road Network

2.3.1 Mill Road

Mill Road (shown in Figure 2 and Figure 3) is owned by Latrobe Council (Council) and is classified as a Sub Arterial Road[1]. The road travels in a north-south direction from Port Sorell Road for 1.7km then has a 90-degree left turn and continues in an east-west direction. Mill Road is subject to the Tasmanian rural road default speed limit of 100km/h.



Figure 2. Mill Road – facing east (Google Maps, 2025)



Figure 3. Mill Road – facing west

2.3.2 Pardoe Road

Pardoe Road (shown in Figure 4 and Figure 5) is owned by State Growth and is classified as an Arterial Road[1]. Pardoe Road runs north to south and is configured with one lane in each direction. Pardoe Road is subject to a speed limit of 100 km/h and carries approximately 1433[3] vehicles per day.



Figure 4. Pardoe Road – facing north (Google Maps, 2025)



Figure 5. Pardoe Road – facing south (Google Maps, 2025)

[1] Road hierarchy sourced from theLIST map "Road Centreline" layer.

[3] Daily vehicle volume calculated using traffic data collected in October 2024 and assuming a peak to daily ratio of 10%. Data sourced from State Growth's traffic data website at counter station A2849100.

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2.3.3 Port Sorell Road

Port Sorell Road (shown in Figure 6 and Figure 7) is owned by State Growth and is classified as an Arterial Road[5]. It operates in an east-west direction and acts as a connection between East Devonport and Port Sorell. Port Sorell Road also connects onto the Bass Highway allowing it to connect with Launceston, Devonport, Burnie and their respective marine ports. Port Sorell Road is subject to a speed limit of 100 km/h and carries approximately 5219[6] vehicles per day.



Figure 6. Port Sorell Road – facing east (Google Maps, 2025)



Figure 7. Port Sorell Road – facing west

2.4 Surrounding Intersections

Intersections surrounding the site are listed below and shown in Figure 8.

- Mill Road/ Access Road (unsignalised T-intersection)
- Port Sorell Road / Mill Road (unsignalised T-intersection)
- Pardoe Road/ Mill Road/ Airport Road (unsignalised T-intersection); and,
- Pardoe Road/ Port Sorell Road/ Brooke Street (roundabout).

[5] Road hierarchy sourced from theLIST map "Road Centreline" layer.

[6] Daily vehicle volume calculated using traffic data collected in October 2024 and assuming a peak to daily ratio of 10%. Data sourced from State Growth's traffic data website at counter station A1329120.

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Figure 8. Surrounding intersections

2.5 Public and Active Transport

No public transport is accessible via Mill Road nor Pardoe Road. The closest bus station is located on Port Sorell Road, 150m east of the Mill Road/ Port Sorell Road intersection. The 183 Port Sorell to Devonport bus travels along Port Sorell Road and services the Wesley Vale Shop 4 times per day in each direction on weekdays from 7:30 to 17:00.

It is relevant that some privately owned shuttle buses service the Devonport Airport, utilising Pardoe Road and the Pardoe Road/ Port Sorell Road/ Brooke Street roundabout to access the airport.

Mill Road, Pardoe Road and Port Sorell Road are not configured with pedestrian footpaths. No on-road cycling facilities are available within the road network in the vicinity of the site.

2.6 Parking

Existing parking in the vicinity of the site is limited to private property only. Such as the ample parking for commercial and light vehicles associated with the industrial warehousing area east of the site. The Wesley Vale Transend Substation, south of the site, also contains a TasNetworks owned parking area within its footprint.

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2.7 Road Safety

State Growth have provided crash data for the most recent 5-year period (2021-2026) in the vicinity of the site. Table 1 and below shows the crash location, type, severity and numbers.

Table 1: Crash history

Location	Crash Severity	Count	Prominent Crash Type
Mill Road/ Pardoe Road – Port Sorell Road (east) to Port Sorell Road (west)	Fatal – 1 Serious – 1 First Aid – 1 Minor – 2 Property Damage only – 2	7	174 &184 - Out of Control on Carriageway (2) 189 – Other Curve (2)
Port Sorell Road – Pardoe Road to Mill Road	First Aid – 2 Minor – 2 Property Damage only – 6	10	132 – Vehicles in same lane/ right rear (2) 130 - Vehicles in same lane/ rear end (2)
Pardoe Road/ Port Sorell Road/ Brooke Street roundabout	Property Damage Only – 2	2	
Total		**19**	

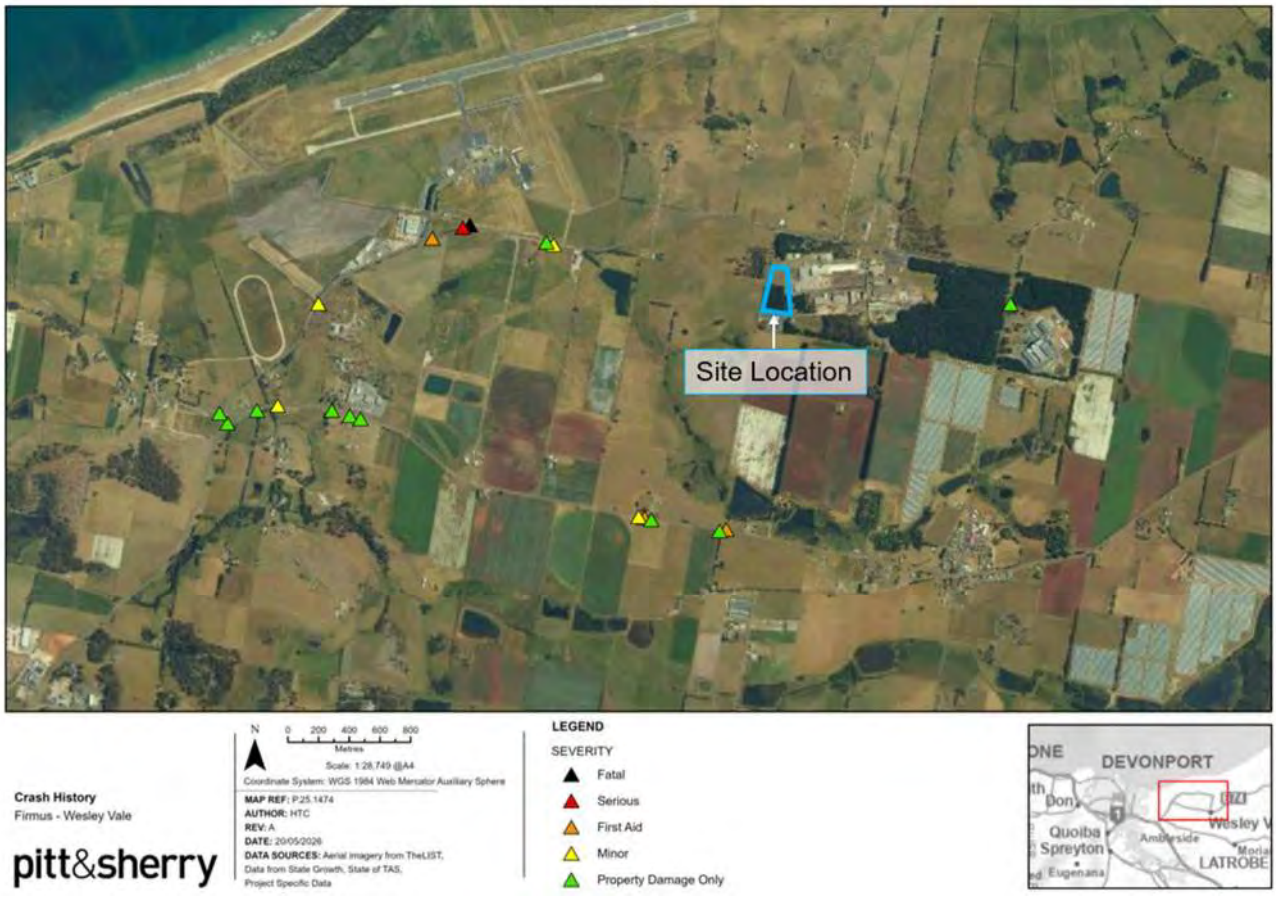


Figure 9. Crash Locations

The crash data above indicates that the majority of crash types recorded in the most recent five year period have occurred once.

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Four rear end crashes have been recorded on Port Sorell Road, often at T-intersections with minor roads.

One fatal crash and one serious crash occurred on Mill Road at the curve located 150m north-east of the Pardoe Road/ Mill Road/ Airport Road intersection. It is not expected that the Firmus development will increase the crash risks associated with this location. However, it is recommended that the Latrobe Council investigate further protections such as reduced speeds, increased advanced warning signage and curve alignment markers to improve vehicle safety at this location.

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3. Proposed Development

3.1 Overview

As shown in Figure 10, the pro**posed development, a data centre, comprises the following key components:**

- Data hall storage building
- Two car parks
- Electricity generators
- Cooling facilities
- Hardstand laydown area
- Water storage; and
- Circulation roads with gates and a guardhouse.

Detailed plans are included in Appendix A.



Figure 10. Overview of the proposed development

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3.2 Proposed Operation

The proposed development will operate on a 24/7 basis with three shifts rotating through the day. The day shift (8:00am – 5:00pm) is proposed to have 10 people on site, including staff and visitors. While the night shift will require 4 staff over 2 shifts.

Security gates and a guardhouse will be installed at the main entrance to prevent public access (for both vehicles and pedestrians) to the site and all personnel entering the site will be inducted and authorised or escorted by a suitably authorised person.

3.3 Vehicular Access

Vehicles will access the site via the Access Road extending from Mill Road to the TasNetworks substation

3.4 Circulation Roads

As shown in Figure 10 and the swept paths in Appendix B, several circulation roads of varying widths are proposed to connect the internal circulation roads and the site access. The main site access road is 12 m wide. Vehicles 8.8 m in length and larger are expected to circulate internally via a one-way arrangement along the 6 m - 10 m wide internal roads, enabling forward entry and exit movements. Light vehicles, including those accessing the seven-space internal car park, will be able to circulate through the site in both directions.

3.5 Parking

A total of 27 car parking spaces are proposed on site for staff and visitors, including one DDA space. Of these, 20 spaces are located within the northern car park, with the remaining seven within the main site, east of the data hall.

Eight dedicated bicycle spaces are reserved in the on-site carpark. No motorcycle parking has been proposed on site.

3.6 Deliveries and Rubbish Collection

Delivery vehicles will access the site via main access only during general business hours. It is understood that a 12.5 m truck would be the largest vehicle accessing the main entrance on site.

During construction and at an anticipated frequency of a twice a year for maintenance purposes, associated vehicles (the largest being a 32m, 5-axle Lowboy and a 19m crane) will be required to access the site. These vehicles will access the site via the neighbouring industrial warehousing zone as shown in Figure 11 and will require temporary traffic management.

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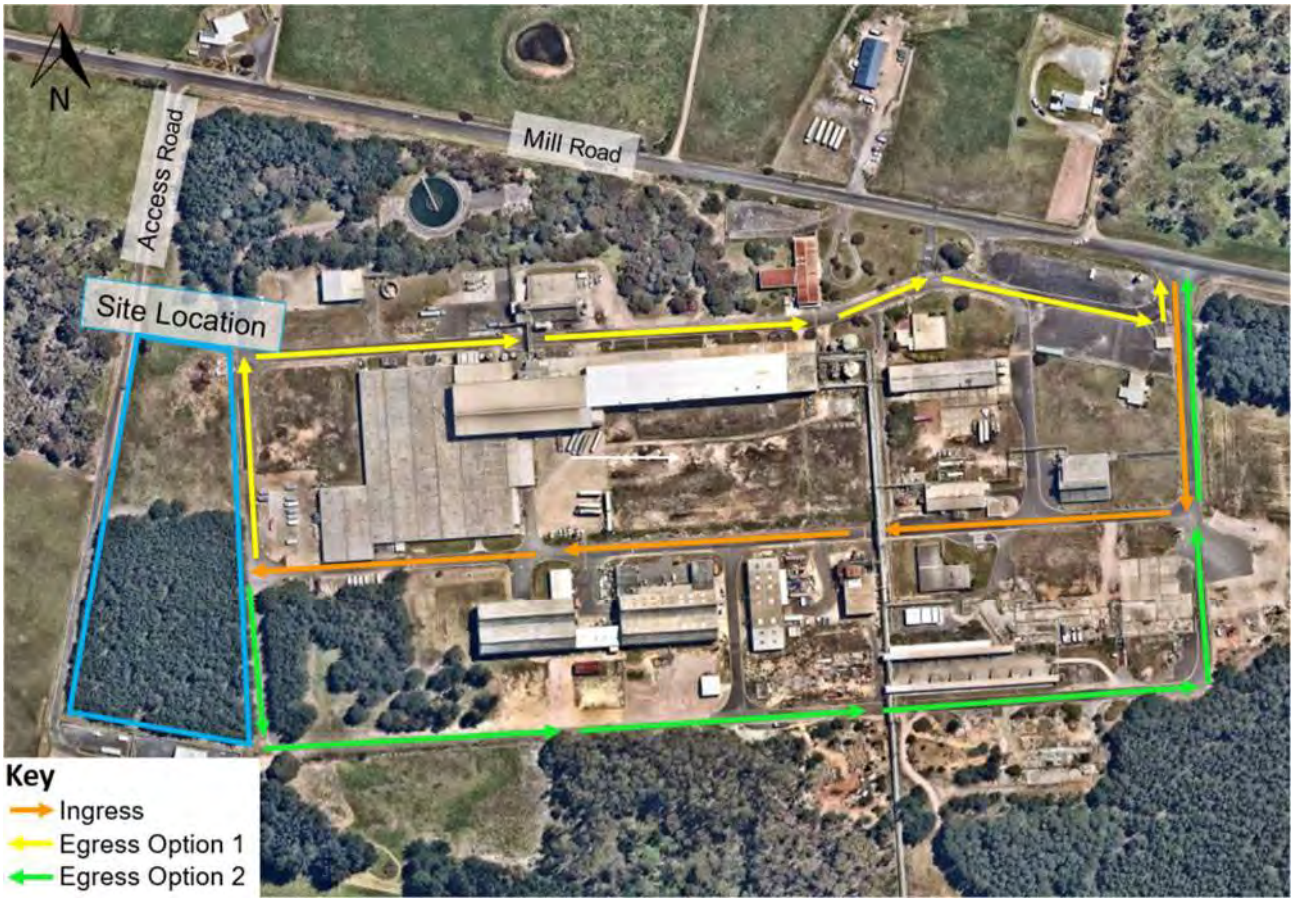


Figure 11. Temporary heavy vehicle access

For the purpose of this assessment, a 12.5m Heavy Rigid Vehicle (HRV), 32m HRV and a 19m crane have been selected to represent the largest vehicle types expected on site.

3.7 Pedestrian Paths

As shown by the blue dashed lines on the site plans (Figure 10), it is understood that pedestrian paths are proposed on site, connecting the car parks, guardhouses and data hall.

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4. Transport Assessment

4.1 Existing Traffic Volumes

Traffic data for Port Sorell Road and Pardoe Road is available from the State Growth Drakewell website. Data was available for counts taken in October 2024. The counts on Port Sorell Road were taken approximately 200m east of Pardoe Road and the counts on Pardoe Road were taken approximately 150m north of Port Sorell Road.

The development will have the highest number of traffic movements around 8:00am and 4:00pm to align with the shift changeover (day shit and night shift). The highest traffic volumes on Port Sorell Road and Pardoe Road will occur very close to the development peak hours at 8:00am and 3:00pm. As a conservate estimate, it has been assessed that the peak hours for the network and the development occur over the same peak periods; 7:00am-8:00am and 2:00pm-3:00pm on weekdays.

The existing traffic volumes during the periods indicated above are summarised in Table 2.

Table 2. Existing Traffic Volumes

Time Period	Traffic Volumes (Average Weekday)			
	Port Sorell Road		Pardoe Road	
	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles
7:00 – 8:00am	582	90 (15%)	133	41 (30%)
3:00pm – 4:00pm	547	75 (14%)	122	30 (25%)
AADT	5655	827 (15%)	1615	425 (26%)

Based on site observations the roads and intersections surrounding the site operate with minimal queues and delays.

4.2 Traffic Impact Assessment

4.2.1 Traffic generation

The Transport for NSW (TfNSW) publication *Guide to Transport Impact Assessment* (NSW Guide) provides surveyed land use trip generation rates for a wide range of developments. However, a specific use for the proposed development, a data centre, does not fit in the provided categories. Therefore, the traffic generation of the site has been reasonably estimated based on first principles (i.e. based on the proposed operation of the site).

The following information related to traffic generation has been provided by the client:

- 10 office staff (day shift) – say 8:00am to 5:00pm
- 4 evening/night shift staff (2x shifts) – 4:00pm to 8:00am
- 1 to 2 delivery vans per day
- 1 to 2 trucks per day (12m Heavy Rigid vehicle)
- Minimal movement of larger vehicles as needed

The first principles traffic generation has been calculated and is shown in

Table 3.

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Table 3. Expected traffic generation

Scenario	Vehicle Type	Traffic Generation	Directional Split
AM Peak	All vehicles	16	75% in/ 25% out
	Heavy vehicles	2	100% in/ 0% out
PM Peak	All vehicle	16	30% in/ 70% out
	Heavy vehicles	2	50% in/ 50% out
Daily	All vehicles	36	50% in/ 50%out
	Heavy vehicles	8	50% in/ 50%out

Due to the low turning movements at the site access, traffic modelling has not been performed.

4.2.2 Traffic Impact – Post Development

Based on the above, the existing traffic volumes and expected traffic generation to each road in the vicinity of the site during the peak periods and full day is shown in Table 4 and Table 5.

Table 4. Pardoe Road Traffic Volumes

Time Period	Post Development Traffic Volumes		% Increase from Existing Traffic volumes	
	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles
7:00 – 8:00am	149	43	12.0%	4.9%
3:00pm – 4:00pm	138	32	13.1%	6.7%
AADT	1651	433	2.2%	1.9%

Based on the data above, the daily traffic volumes on Pardoe Road are expected to increase by 2.2% as a result of the development. The increase in hourly traffic during shift changeover times is around an additional 12.5% of existing traffic volumes. Considering the low traffic volumes currently on Pardoe Road, the traffic generated by the development may be noticeable during shift changeovers but would not be expected to compromise the function or safety of Pardoe Road.

Table 5. Port Sorell Road Traffic Volumes

Time Period	Post Development Traffic Volumes		% Increase from Existing Traffic volumes	
	All Vehicles	Heavy Vehicles	All Vehicles	Heavy Vehicles
7:00 – 8:00am	598	92	2.7%	2.2%
3:00pm – 4:00pm	563	77	2.9%	2.7%
AADT	5691	835	0.6%	1.0%

Based on the data above, the daily traffic volumes on Port Sorell Road are expected to increase by less than 1% as a result of the development. The increase in hourly traffic during the shift changeovers is about 2.6%. As discussed, the existing road network, including Port Sorell Road, has minimal queuing and delays at intersections. Based on this, the development would not be expected to compromise the function or safety of Port Sorell Road.

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4.2.3 Traffic Impact – 10-year post development (2036)

Traffic volume impacts on Pardoe Road and Port Sorell Road have been estimated for the 10-year post development scenario. To estimate, the following assumptions have been made:

- A linear annual growth rate of 2% of the network traffic volumes has been conservatively adopted based on the historical traffic data on Pardoe and Port Sorell Road; and
- The proposed Firmus AI factory will continue to operate as is and will not increase its traffic generation.

If further construction works, expansion or development is proposed that will result in additional traffic being generated at the development, a TIA should be prepared for relevant authority's consideration. Based on Table 6, the expected 10-year post-development traffic volumes are not expected to disrupt the existing road network or significantly impact level of service, particularly not due to the Firmus AI factory.

Table 6. 10-year post-development traffic volumes.

Time Period	Pardoe Road		Port Sorell Road	
	All vehicles	Heavy vehicles	All vehicles	Heavy vehicles
7:00 – 8:00am	176	51	714	110
3:00pm – 4:00pm	162	38	672	92
AADT	1974	518	6822	1000

4.2.4 Construction Traffic

Traffic impacts for the construction phase of the project have not been discussed in detail in this TIA as construction traffic alone usually does not trigger the Traffic Code (e.g. Clause C2.6.2), with the following considerations:

- Construction traffic will be temporary
- They do not form part of the ultimate use of the site; and
- It is interpreted that the Traffic Code is designed to assess long-term use impacts rather than short-term works.

Nerveless, construction vehicle impacts such as access, dust, and traffic management are typically dealt with through:

- Construction Environmental Management Plans (CEMPs)
- Traffic Management Plans, or
- Permit conditions (not the Code itself).

4.2.5 Road Safety Impacts

The two high severity crashes on the bend at Mill Road highlight an area where signage improvements could be installed to improve existing traffic outcomes. However, the expected traffic generation of the proposed development both immediately post development and 10-years post development is not expected to increase the risk or severity of crashes in the vicinity of the site.

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4.3 Parking Layout Assessment

The car parking layout has been reviewed against the Planning Scheme, the *Australian Standard AS/NZS2890.1:2004 Parking facilities: Off-Street car parking* (AS 2890.1) and the *Australian Standard AS/NZS2890.6:2009 Parking facilities: Off-street parking for people with disabilities* (AS 2890.6).

Excerpts of Table 1.1, Table 3.1 and Table 3.2 from AS 2890.1 are shown below in Figure 12, Figure 13 and Figure 14.

TABLE 1.1

CLASSIFICATION OF OFF-STREET CAR PARKING FACILITIES

User class	Required door opening	Required aisle width	Examples of uses (Note 1)
1	Front door, first stop	Minimum for single manoeuvre entry and exit	Employee and commuter parking (generally, all-day parking)
1A	Front door, first stop	Three-point turn entry and exit into 90° parking spaces only, otherwise as for User Class 1	Residential, domestic and employee parking
2	Full opening, all doors	Minimum for single manoeuvre entry and exit	Long-term city and town centre parking, sports facilities, entertainment centres, hotels, motels, airport visitors (generally medium-term parking)
3	Full opening, all doors	Minimum for single manoeuvre entry and exit	Short-term city and town centre parking, parking stations, hospital and medical centres
3A	Full opening, all doors	Additional allowance above minimum single manoeuvre width to facilitate entry and exit	Short term, high turnover parking at shopping centres
4	Size requirements are specified in AS/NZS 2890.6 (Note 2)		Parking for people with disabilities

Figure 12: Excerpt of Table 1.1 from Australian Standard AS 2890.1

TABLE 3.1

SELECTION OF ACCESS FACILITY CATEGORY

Class of parking facility (see Table 1.1)	Frontage road type	Access facility category				
		Number of parking spaces (Note 1)				
		<25	25 to 100	101 to 300	301 to 600	>600
1,1A	Arterial	1	2	3	4	5
	Local	1	1	2	3	4
2	Arterial	2	2	3	4	5
	Local	1	2	3	4	4
3,3A	Arterial	2	3	4	4	5
	Local	1	2	3	4	4

Figure 13. Excerpt of Table 3.1 from Australian Standard AS 2890.1

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TABLE 3.2

ACCESS DRIVEWAY WIDTHS

metres

Category	Entry width	Exit width	Separation of driveways
1	3.0 to 5.5	(Combined) (see Note)	N/A
2	6.0 to 9.0	(Combined) (see Note)	N/A
3	6.0	4.0 to 6.0	1 to 3
4	6.0 to 8.0	6.0 to 8.0	1 to 3
5	To be provided as an intersection, not an access driveway, see Clause 3.1.1.		

NOTE: Driveways are normally combined, but if separate, both entry and exit widths should be 3.0 m min.

Figure 14. Excerpt of Table 3.2 from Australian Standard AS 2890.1

As the development requires employee parking, the car park was assessed against the User Class 1 requirements of AS 2890.1. Based on the location of the vehicle entry and the number of car parking spaces, the northern car park access must comply with Category 1 access driveway width requirements. The northern car park access is 6m wide, which exceeds the 3.0m – 5.5m access width requirements and is considered suitable in this context. The access requirements will still be met if visitor access (User Class 2) to the site is required due to the 6.0m wide access.

The main site access is expected to provide site access to Heavy Rigid Vehicles (HRV) and is subject to *Australian Standard Part 2: Off-street commercial (AS2890.2)*. AS 2890.2 requires a minimum width of 12.5 m for HRVs. The proposed two-way site access also has a width of 12.5 m and is therefore compliant.

The parking dimension assessment is shown below in Table 7, noting that an example of 90-degree parking spaces layouts from AS2890.1 is shown below in Figure 15.

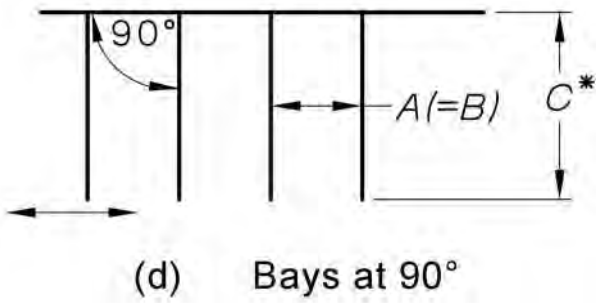


Figure 15: Excerpt of 90-degree parking spaces layout from AS2890.1 Figure 2.2

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Table 7: Car parking dimensions

Car Park	Feature	Proposed	Minimum Requirement (AS 2890.1 and AS 2890.6)
User Class 1 - 90-degree parking	Parking Space Width	2.6m	2.4m
	Parking Space Length	5.4m	5.4m
	Parking Aisle Width	6.0m	5.8m
DDA Accessible Parking – 90-degree parking	Parking Space Width	2.6m	2.4m
	Parking Space Length	5.4m	5.4m
	Shared Area (side)	2.5m wide, 5.4m long	2.4m wide, 5.4m long
	Parking Aisle Width	8.9m	5.8m

Based on the above, the proposed car parking dimensions meets the requirements of AS 2890.1 and AS 2890.6.

As shown in Figure 16 from AS 2890.1, a 1.0m blind aisle extension is required for the car park. This requirement has been incorporated into the design, as shown on the plans.

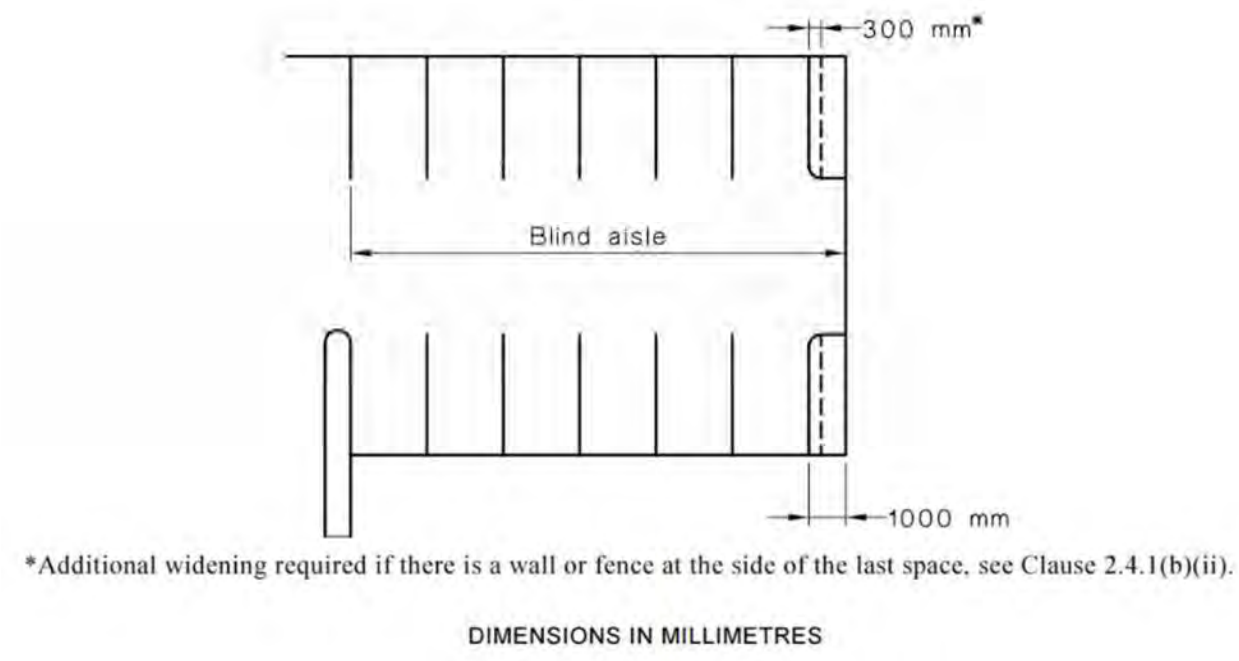


Figure 16. Figure 2.3 of Australian Standard AS 2890.1

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4.4 Site Layout Assessment

4.4.1 Pedestrian Access

As shown on the plans, it is understood that pedestrian paths are proposed on site, connecting the car parks with the guardhouse and data hall. The pedestrian paths will be nominally 1.2 m wide.

4.4.2 Gradient

It is understood that the site is relatively flat. The Access Road grade is currently at a 22% upwards slope from Mill Road. This Access Road will be regarded to a maximum gradient of 12.5%, to allow for heavy vehicle access, in line with Australian Standards.

4.5 Parking Provision Assessment

It is understood that the development is classified as a “Utilities” land use under the Planning Scheme, for which there is no parking provision requirements. As such, the proposed parking provision has been assessed based on first principles (i.e. the operational demand on site*).*

With 10-day shift employees and 4 evening/ night shift employees, the worst-case scenario at shift change would require 14 car parking spaces (10 for departing & 4 for arriving). The proposed provision of 27 parking spaces, including 2 DDA-accessible spaces, exceeds the recommended minimum parking requirements.

No bicycle parking is required under the utilities land use classification. Nonetheless, bicycle parking has been provisioned for in the site carpark, to ensure employees have access to secure bicycle facilities.

4.6 Deliveries and Rubbish Collection

Turning paths have been undertaken using the largest design vehicle, with relevant manoeuvring clearances to ensure sufficient space for heavy vehicle manoeuvring.

The swept path analysis in Appendix B demonstrates that sufficient space is available for the 18m crane, 12.5m HRV and 8.8m typical rubbish collection Medium Rigid Vehicle (MRV) to safely load and unload along the internal circulation roadways and across the trafficable slabs.

The swept paths in Figure 17 demonstrate that a 32m 5-axle heavy vehicle, the largest vehicles expected to access the site via the neighbouring property, can enter and exit the industrial leasing zone in a forward direction. Minor private road widening and temporary traffic management on public and private roads will be required when the 32m 5-axle heavy vehicle accesses the site.

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Figure 17. 32m 5-axle heavy vehicle swept path

4.7 Turn Lane Assessment

Section 3.3.5 of the *Austroads Guide to Traffic Management Part 6: Intersections, interchanges and Crossing Management* (AGTM Part 6) specifies warrants for providing left and right turn treatments at unsignalised intersections. Figure 18 below is an excerpt of Figure 3.25 of AGTM Part 6 and presents warrants for turn treatments on major roads at unsignalised intersections for urban roads that have a speed limit of 100km/h or more.

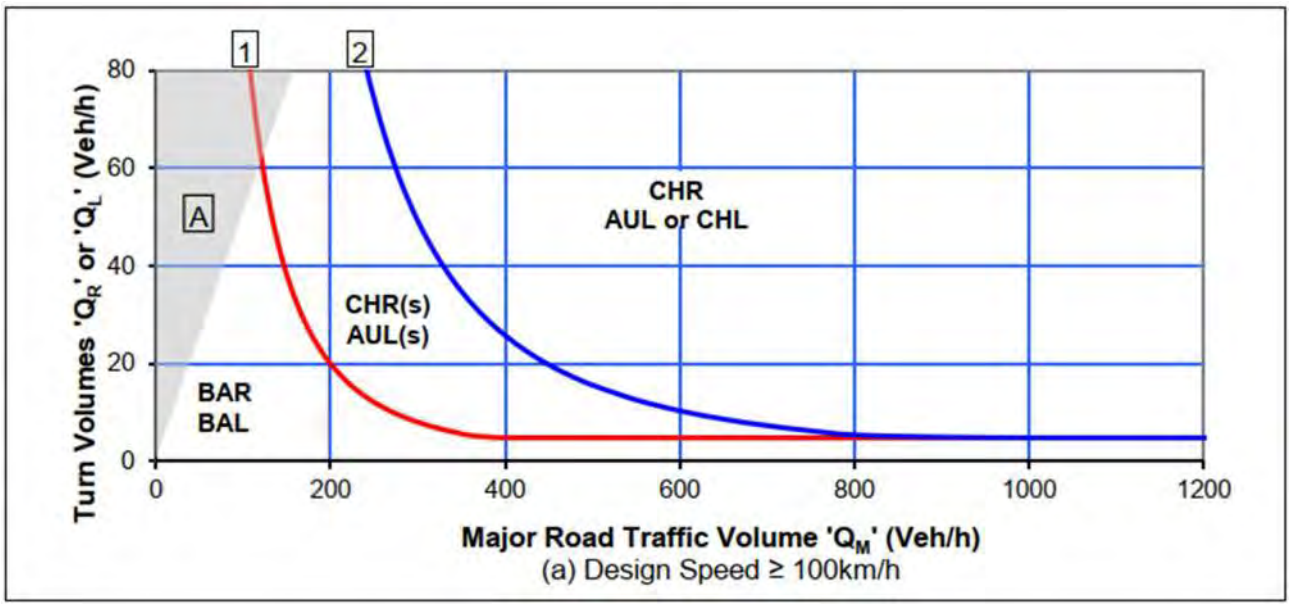


Figure 18: Warrants for turn treatments on major roads at unsignalised intersections

Table 8 shows the expected turning and opposing traffic volumes at the access point at Mill Road during peak hours.

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It is noted that Q_M is the major road traffic parameter and indicates the opposing vehicles that a right or left turning vehicle would encounter. For a highly conservative analysis, it has been assumed that 100% of the vehicles travelling along Pardoe Road continue onto Mill Road. It is very likely that the actual volumes on Mill Road will be lower as vehicles access the airport and turn off Mill Road.

Table 8: Opposing movements to turning vehicles

Peak Hour	Q_M (veh/ hr)		Q_R (veh/ hr)	Q_L (veh/ hr)
	Q_M Right	Q_M Left		
AM	112	49	12	0
PM	106	58	5	0

Based on the assessment of the opposing movements in Table 8, the warrants in AGTM Part 6 suggest that a basic right-turn treatment (BAR) and a basic left-turn treatments (BAL) be provided along Mill Road at the Access Road. This treatment is incorporated within the design plans and is considered appropriate for the expected traffic conditions at the Access Road.

It is noted that if traffic volumes along the road network and/ or turning movements at the site access were to increase significantly with future development, channelised turn treatments (Type CH) may be more suitable.

4.8 Queueing Assessment

To ensure that there is sufficient queueing area available between the guardhouse and the Access Road, the queuing area has been reviewed against the Australian Standard requirements.

In order to determine the queuing area requirements, the storage queue length that will not be exceeded 95% of the time has been calculated using queuing theory which states:

$$N = \frac{\log(0.05)}{\log(\rho) - 1}$$

Where

$N = Storage\ queue\ length\ required\ (NO.of\ vehicle)$

$\rho = utilization\ factor = \frac{r}{s}$

$r =\ average\ arrival\ rate\ (vehicles\ per\ hour, vph)$

$s = service\ rate\ (vehicles\ per\ hour)$

The following assumptions are made to calculate the required storage length:

- Conservatively it is estimated that it takes 1 minute to serve each vehicle arriving at the gates, the service rate is calculated to be 60 vehicles per hour; and,
- Based on traffic generation as discussed in Section 4.2 of this report, it is assumed that up to 12 vehicles will arrive at the main security gate during peak hour.

Based on the above, it is calculated that the storage queue length required is 1 vehicle. The storage queue length is approximately 25m outside the guardhouse, which exceeds the required queue length.

It is noted that the available storage queue length is also considered sufficient to accommodate trucks queuing at the gate.

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5. Planning Scheme Assessment

5.1 Summary

The proposed development has been assessed against the relevant Planning Scheme requirements. A summary of the relevant Planning Scheme clauses is shown in Table 9.

Table 9: Planning Scheme Clauses Summary

Clause	Description	Compliance	Comment Location Reference
C2.5 Parking and Sustainable Transport Code – Use Standards			
C2.5.1	Car parking numbers	Complies with Acceptable Solution A1	Section 4.5
C2.5.2	Bicycle parking numbers	Complies with Acceptable Solution A1	Section 4.5
C2.5.3	Motorcycle parking numbers	Complies with Acceptable Solution A1	Section 4.5
C2.5.4	Loading bays	Satisfies Performance Criteria P1	Section 4.6
C2.6 Parking and Sustainable Transport Code – Development Standards			
C2.6.1	Construction of parking areas	Complies with Acceptable Solution A1	Section 4.3
C2.6.2	Design and layout of parking areas	Complies with Acceptable Solution A1.1 & A1.2	Section 4.3
C2.6.3	Number of accesses for vehicles	Complies with Acceptable Solution A1	Section 4.3
C2.6.5	Pedestrian access	Complies with Acceptable Solution A1.1 Will comply with Acceptable Solution A1.2	Section 4.4
C2.6.6	Loading bays	Satisfies performance Criteria P1 Complies with Acceptable Solution A1	Section 4.6
C3.5 Road and Railway Assets Code – Use Standards			
C3.5.1	Traffic generation at a vehicle crossing, level crossing or new junction	Satisfies Performance Criteria P1	Section 4.2

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5.2 C2.5 Parking and Sustainable Transport Code – Use Standards

C2.5.1 Car parking numbers

Objective:

That an appropriate level of car parking spaces are provided to meet the needs of the use.

Acceptable Solution/ Performance Criteria	Comment
Acceptable Solution A1 The number of on-site car parking spaces must be no less than the number specified in Table C2.1, excluding if: a) the site is subject to a parking plan for the area adopted by council, in which case parking provision (spaces or cash-in-lieu) must be in accordance with that plan; b) the site is contained within a parking precinct plan and subject to Clause C2.7; c) the site is subject to Clause C2.5.5; or d) it relates to an intensification of an existing use or development or a change of use where: i. the number of on-site car parking spaces for the existing use or development specified in Table C2.1 is greater than the number of car parking spaces specified in Table C2.1 for the proposed use or development, in which case no additional on-site car parking is required; or ii. the number of on-site car parking spaces for the existing use or development specified in Table C2.1 is less than the number of car parking spaces specified in Table C2.1 for the proposed use or development, in which case on-site car parking must be calculated as follows: N = A + (C- B) N = Number of on-site car parking spaces required A = Number of existing on site car parking spaces B = Number of on-site car parking spaces required for the existing use or development specified in Table C2.1 C = Number of on-site car parking spaces required for the proposed use or development specified in Table C2.1.	**Complies with Acceptable Solution A1** There is no requirement for car parking under the Planning Scheme, the site has been assessed to provide sufficient parking for the development needs.

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C2.5.2 Bicycle parking numbers	
Objective: That an appropriate level of bicycle parking spaces are provided to meet the needs of the use.	
Acceptable Solution/ Performance Criteria	**Comment**
Acceptable Solution A1 Bicycle parking spaces must: a) be provided on the site or within 50m of the site; and b) be no less than the number specified in Table C2.1.	**Complies with Acceptable Solution A1** There is no requirement for bicycle parking under the Planning Scheme, some bicycle parking has been provided should employees choose to ride to work.

C2.5.3 Motorcycle parking numbers	
Objective: That the appropriate level of motorcycle parking is provided to meet the needs of the use.	
Acceptable Solution/ Performance Criteria	**Comment**
Acceptable Solution A1 The number of on-site motorcycle parking spaces for all uses must: a) be no less than the number specified in Table C2.4; and b) if an existing use or development is extended or intensified, the number of on-site motorcycle parking spaces must be based on the proposed extension or intensification, provided the existing number of motorcycle parking spaces is maintained.	**Complies with Acceptable Solution A1** There is no requirement for motorcycle parking under the Planning Scheme. If an employee were to ride a motorcycle they could use the sufficient available car parking.

C2.5.4 Loading bays	
Objective: That adequate access for goods delivery and collection is provided, and to avoid unreasonable loss of amenity and adverse impacts on traffic flows.	
Acceptable Solution/ Performance Criteria	**Comment**
Acceptable Solution A1 A loading bay must be provided for uses with a floor area of more than 1000m² in a single occupancy. **Performance Criteria P1** Adequate space for loading and unloading of vehicles must be provided, having regard to: a) the type of vehicles associated with the use; b) the nature of the use; c) the frequency of loading and unloading; d) the location of the site; e) the nature of traffic in the surrounding area; f) the area and dimensions of the site; and g) the topography of the site; h) the location of existing buildings on the site; and	**Satisfies Performance Criteria P1** a) The site will be served by typical 8.8m MRV delivery trucks and 12.5m HRVs. The largest vehicles expected to access the site are 32m 5-axle heavy vehicles and mobile cranes b) Mobile cranes and 5-axle heavy vehicles will be used for the movement of data centre infrastructure. c) It is expected that, following construction, the largest vehicles will not regularly service the site. A 12.5m HRV will continue to undertake routine deliveries and waste collection. d) The site is located in a light industrial zone off Mill Road in Wesley Vale, 2km east of the Devonport airport.

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i) any constraints imposed by existing development.	e) Mill Road provides all vehicle access to and from the site. It is expected that most of the traffic on Mill Road also travels along Pardoe Road – which carries 1433 vehicles per day, with heavy vehicles accounting for 25% of traffic. f) The site is approximately 20,000m^2 g) The site is relatively flat, the Access Road from Mill Road to the main development will be regraded to a maximum 12.5% gradient. h) There are no existing buildings on the site i) Not applicable.

5.3 C2.6 Parking and Sustainable Transport Code – Development Standards

C2.6.1 Construction of parking areas

Objective:

That parking areas are constructed to an appropriate standard.

Acceptable Solution/ Performance Criteria	Comment
Acceptable Solution A1 All parking, access ways, manoeuvring and circulation spaces must: a) be constructed with a durable all weather pavement; b) be drained to the public stormwater system, or contain stormwater on the site; and c) excluding all uses in the Rural Zone, Agriculture Zone, Landscape Conservation Zone, Environmental Management Zone, Recreation Zone and Open Space Zone, be surfaced by a spray seal, asphalt, concrete, pavers or equivalent material to restrict abrasion from traffic and minimise entry of water to the pavement.	**Complies with Acceptable Solution A1** As shown on the plans in Appendix A, the parking, access ways, manoeuvring and circulation spaces will all be constructed with a durable all weather pavement and are drained to the onsite stormwater system, thus, the proposed development will comply with Acceptable Solution A1.

C2.6.2 Design and layout of parking areas

Objective:

That parking areas are designed and laid out to provide convenient, safe and efficient parking.

Acceptable Solution/ Performance Criteria	Comment
Acceptable Solution A1.1 Parking, access ways, manoeuvring and circulation spaces must either: a) comply with the following: i. have a gradient in accordance with *Australian Standard AS 2890 - Parking facilities, Parts 1-6;* ii. provide for vehicles to enter and exit the site in a forward direction where providing for more than 4 parking spaces; iii. have an access width not less than the requirements in Table C2.2;	**Complies with Acceptable Solution A1.1 and A1.2** The car parking is designed in accordance with the relevant Australian Standards.

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iv. have car parking space dimensions which satisfy the requirements in Table C2.3; v. have a combined access and manoeuvring width adjacent to parking spaces not less than the requirements in Table C2.3 where there are 3 or more car parking spaces; vi. have a vertical clearance of not less than 2.1m above the parking surface level; and vii. excluding a single dwelling, be delineated by line marking or other clear physical means; or *b)* comply with *Australian Standard AS 2890- Parking facilities, Parts 1-6.* **Acceptable Solution A1.2** Parking spaces provided for use by persons with a disability must satisfy the following: a) be located as close as practicable to the main entry point to the building; b) be incorporated into the overall car park design; and c) be designed and constructed in accordance with *Australian/ New Zealand Standard AS/NZS 2890.6:2009 Parking facilities, Off-street parking for people with disabilities.*	

C2.6.3 Number of accesses for vehicles

Objective:

That:

a) access to land is provided which is safe and efficient for users of the land and all road network users, including but not limited to drivers, passengers, pedestrians and cyclists by minimising the number of vehicle accesses;

b) accesses do not cause an unreasonable loss of amenity of adjoining uses; and

c) the number of accesses minimise impacts on the streetscape.

Acceptable Solution/ Performance Criteria	Comment
Acceptable Solution A1 The number of accesses provided for each frontage must: a) be no more than 1; or b) no more than the existing number of accesses, whichever is the greater. **Performance Criteria P1** The number of accesses for each frontage must be minimised, having regard to: a) any loss of on-street parking; and b) pedestrian safety and amenity; c) traffic safety; d) residential amenity on adjoining land; and e) the impact on the streetscape.	**Complies with Acceptable Solution A1** The number of site accesses will remain unchanged, with the existing privately owned access road continuing to provide sole access.

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C2.6.5 Pedestrian access	
Objective: That pedestrian access within parking areas is provided in a safe and convenient manner.	
Acceptable Solution/ Performance Criteria	**Comment**
Acceptable Solution A1.1 Uses that require 10 or more car parking spaces must: a) have a 1m wide footpath that is separated from the access ways or parking aisles, excluding where crossing access ways or parking aisles, by: i. a horizontal distance of 2.5m between the edge of the footpath and the access way or parking aisle; or ii. protective devices such as bollards, guard rails or planters between the footpath and the access way or parking aisle; and b) be signed and line marked at points where pedestrians cross access ways or parking aisles. **Acceptable Solution A1.2** In parking areas containing accessible car parking spaces for use by persons with a disability, a footpath having a width not less than 1.5m and a gradient not steeper than 1 in 14 is required from those spaces to the main entry point to the building.	**Complies with Acceptable Solution A1.1** As discussed in section 4.2 of this report, as a pedestrian path is proposed on site along the proposed pedestrian activity routes, Acceptable Solution A1.1 is complied with. It is recommend that the path is clearly delineated and crossing facilities be provided in future design stages. **Can comply with Acceptable Solution A1.2** As the pedestrian path has not been detailed in the preliminary design, this TIA has recommended the pedestrian path connecting the DDA accessible spaces with the Data Hall to have a width not less than 1.5m and a gradient not steeper than 1 in 14.

C2.6.6 Loading bays	
Objective: That the area and dimensions of loading bays are adequate to provide safe and efficient delivery and collection of goods.	
Acceptable Solution/ Performance Criteria	**Comment**
Acceptable Solution A1 The area and dimensions of loading bays and access way areas must be designed in accordance with *Australian Standard AS 2890.2–2002, Parking facilities, Part 2: Off-street commercial vehicle facilities*, for the type of vehicles likely to use the site. **Performance Criteria P1** Loading bays must have an area and dimensions suitable for the use, having regard to: a) the types of vehicles likely to use the site; b) the nature of the use; c) the frequency of loading and unloading; d) the area and dimensions of the site; e) the topography of the site; f) the location of existing buildings on the site; and g) any constraints imposed by existing development.	**Satisfies Performance Criteria P1** a) Employee light vehicles will make up the majority of vehicles accessing the site. The site will also be served by typical 8.8m MRV delivery trucks. The largest vehicles expected to access the site are 32m 5-axle heavy vehicles and mobile cranes b) The loading areas are appropriately designed for the site's use. Delivery vehicles can access the trafficable slabs for routine operations, with larger vehicles (32 m heavy vehicles) accommodated via the circulating roadways with traffic safety controls implemented. c) It is expected that, following construction, the largest vehicles will not regularly service the site. An 8.8 m MRV will continue to undertake routine deliveries and waste collection. d) The site is approximately 20,000m^2 e) The site is relatively flat, the Access Road from Mill Road to the main development will be regraded to a maximum 12.5% gradient. f) There are no existing buildings on the site g) Not applicable.

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Acceptable Solution A2 The type of commercial vehicles likely to use the site must be able to enter, park and exit the site in a forward direction in accordance with *Australian Standard AS 2890.2 – 2002, Parking Facilities, Part 2: Parking facilities - Off-street commercial vehicle facilities.*	**Complies with Acceptable Solution A2**

5.4 C3.5 Road and Railway Assets Code – Use Standards

C3.5.1 Traffic generation at a vehicle crossing, level crossing or new junction

Objective:

To minimise any adverse effects on the safety and efficiency of the road or rail network from vehicular traffic generated from the site at an existing or new vehicle crossing or level crossing or new junction.

Acceptable Solution/ Performance Criteria	Comment
Acceptable Solution A1.1 For a category 1 road or a limited access road, vehicular traffic to and from the site will not require: a) a new junction; b) a new vehicle crossing; or c) a new level crossing. **Acceptable Solution A1.2** For a road, excluding a category 1 road or a limited access road, written consent for a new junction, vehicle crossing, or level crossing to serve the use and development has been issued by the road authority. **Acceptable Solution A1.3** For the rail network, written consent for a new private level crossing to serve the use and development has been issued by the rail authority. **Acceptable Solution A1.4** Vehicular traffic to and from the site, using an existing vehicle crossing or private level crossing, will not increase by more than: a) the amounts in Table C3.1; or b) allowed by a licence issued under Part IVA of the *Roads and Jetties Act 1935* in respect to a limited access road. **Acceptable Solution A1.5** Vehicular traffic must be able to enter and leave a major road in a forward direction. **Performance Criteria P1** Vehicular traffic to and from the site must minimise any adverse effects on the safety of a junction, vehicle crossing or level crossing or safety or efficiency of the road or rail network, having regard to: a) any increase in traffic caused by the use; b) the nature of the traffic generated by the use;	**Complies with Acceptable Solution A1.1** **Acceptable Solution A1.2 Not applicable** **Acceptable Solution A1.3 Not applicable** **Does Not Comply with Acceptable Solution A1.4** **Complies with Acceptable Solution A1.5** **Satisfies Performance Criteria P1** a) Traffic accessing site will increase by 36 vehicle movements per day (8 of which will be heavy vehicle movements) b) The traffic will be generated by datacentre employees and delivery vehicles c) Mill Road is a sealed council owned road that configured with 1 lane in each direction. d) Mill Road is subject to a speed limit of 100 km/h and currently experiences traffic conservatively estimated as the same as Port Sorell Road, approximately 1433 vehicles/day. e) Mill Road is the only access to this road f) Mill Road is the closest road and provides access to the proposed site and all neighbouring properties. g) Section 4 of this report outlines the effects of this increase in traffic on the network h) No advice has been received from the road or rail authority.

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c) the nature of the road; d) the speed limit and traffic flow of the road; e) any alternative access to a road; f) the need for the use; g) any traffic impact assessment; and h) any advice received from the rail or road authority.	

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6. Conclusion

Firmus Technologies have engaged pitt&sherry to undertake a Traffic Impact Assessment (TIA) for the proposed datacentre in Wesley Vale. The analysis and discussion presented in this report can be summarised as follows:

- The crash history shows that the new development will not increase the severity or frequency of crashes in the vicinity of the site. However, it is recommended that the Latrobe Council investigate further protections for vehicles at the horizontal curve on Mill Road near Airport Road.
- The traffic generated by the development is not expected to adversely affect the function or safety of the surrounding road network, given the relatively low vehicle volumes anticipated at the site.
- There is no parking provision requirement however, a provision of 27 parking spaces (including 2 DDA spaces), is considered appropriate for the proposed development based on first principles assessment
- The car parking circulation and layout complies with relevant Australian standards. The swept path assessment demonstrates that the design vehicles can suitably access the site.

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Site Plans

Appendix A

pitt&sherry

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0 12.5 25 50

1 / 55

18X STANDARD PARKING
2X EV PARKING

FIRE TRUCK HARD STAND

18000 X 6000 HARDSTANDS

VEHICLE TRAP

GUARDHOUSE

BI-FOLDING GATES

250kl 250kl 250kl 250kl

FIRE PUMP ROOM

SPRINKLER AND HYDRANT TANKS

6000

1 / 56

51074

9923

16 BIKE PARKING

2 X STANDARD PARKING
2X ACCESS PARKING

ON ROOF MECHANICAL EQUIPMENT

ON ROOF SOLAR PANELS

13228

SPACE FOR IN GROUND AWTS

LOADING DOCK AREA

1 / 56

6000

250kl 250kl

WATER PUMP ROOM

2 x 60m³ WATER TREATMENT

16000

11027

5998

10000

WATER PUMP ROOM

ELECTRICAL KIOSK

250kl 250kl

MAKE UP WATER TANKS
250kl PER TANK

1 / 56

16000 64700 5998

1 PROPOSED SITE PLAN
1 : 500

PERIMETER FENCE SPECS:

FENCE
TRIPLE-POINTED (W-SPIKE) PALISADE.
MINIMUM HEIGHT: 3.0M ABOVE GROUND (INC. CONCRETE BASE).
FIXED INTO REINFORCED CONCRETE BASE OF A MINIMUM 500MM HEIGHT.
ANTI-DIG FEATURE EXTENDING AT LEAST 200MM BELOW GROUND (IF NOT FIXED INTO CONCRETE BASE).
ANTI-CLIMB.

MATERIAL
HOT-DIP GALVANIZED STEEL OR POWDER-COATED FOR CORROSION RESISTANCE.
GAP BETWEEN VERTICAL PALES <60MM.
GAP BETWEEN PALE AND POST <10MM.
GAP BETWEEN CONCRETE BASE AND BOTTOM OF PALE <10MM.
ANTI-TAMPER AND ANTI-CUT FIXINGS.

POSTS
INTERMEDIATE POSTS: 120MM X 80MM RECTANGULAR HOLLOW SECTION (RHS).
CORNER POSTS: 120MM X 120MM RHS.
POST CENTRES: 2.75M.

FENCE LINE
NO CURVED FENCELINES OF CONCEALED AREAS THAT IMPACT ABILITY FOR EFFECTIVE CCTV / VIDEO SURVEILLANCE COVERAGE.

SECURITY SYSTEMS
CAPABLE OF INTEGRATING A PERIMETER INTRUDER DETECTION SOLUTION.
100% BY CCTV / VIDEO SURVEILLANCE OF FENCELINE (CCTV TRACE TO BE PROVIDED).
SYSTEMS INFRASTRUCTURE TO BE ON SECURE SIDE (SPECIFICATIONS TO BE PROVIDED FOR SECURING).

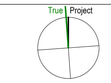
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+61 2 9956 2666 | hdrinc.com
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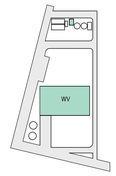
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NORTH POINT





REV	DESCRIPTION OF CHANGE	DATE	CHECKED	ISSUED TO
A	ISSUED FOR DRAFT DA	29/05/26	HDR	FIRMUS

LEGEND

GATE ENTRY

FENCE

CARPARKING:

EV - ELECTRICAL VEHICLE	2 SPACES
ACCESSIBLE	2 SPACES
STANDARD	23 SPACES
TOTAL	**27 SPACES**
BIKE PARKING	16 SPACES

CLIENT

firmus

PROJECT
WESLEY VALE
118 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
PROPOSED SITE PLAN

SCALE: As indicated @ A1
PROJECT NUMBER: 10463896
DRAWING NUMBER: **04**
ISSUE: **A**

PROJECT STATUS
PRELIMINARY

27/05/2026 1:48:59 PM

Autodesk Docs://10463896 Firmus AU Wesley Vale/04-PRELIM-ARC-WV-BUILDING-04

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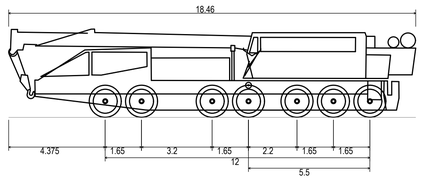
Swept Path Analysis

Appendix B

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DESIGN VEHICLE



Liebherr LTM 1400-7.1 Mobile Crane	
Overall Length	18.460m
Overall Width	3.230m
Overall Body Height	4.000m
Min Body Ground Clearance	0.330m
Track Width	3.230m
Lock-to-lock time	4.00s
Curb to Curb Turning Radius	11.664m



SWEPT PATH ASSESSMENT

SCALE 1:500 (m)

REFERENCE FILES ATTACHED: S-P.25.1474-00-CIV-XRF-1950; S.P.25.1474.01-CIV-XRF-1110; S-P.25.1474-00-CIV-XRF-1500; S.P.25.1474.01-CIV-XRF-1125; S.P.25.1474.01-CIV-XRF-1110-CAD; SK-006b-PROPOSED SITE PLAN

P&S FORM DRG-A1 REV 29

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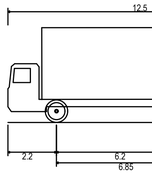
10 0 10 20 30 40
SCALE IN METRES - 1:500

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CLIENT: FIRMUS INFRASTRUCTURE PTY LTD
CONTRACT TITLE: WESLEY VALE DEVELOPMENT
STATUS: INFORMATION ONLY

DRAWING TITLE: SWEPT PATH ASSESSMENT
MOBILE CRANE SWEPTH PATHS
DATUMS: AHD/GDA20-MGA55
CLIENT No.
DRAWING No. S-P.25.1474-00-CIV-DRG-1901
REVISION UR
PRINT IN COLOUR
May. 21, 26 - 14:46:57 Name: S-P.25.1474-00-CIV-DRG-1901-1905.dwg Updated By: Gerry Moore



Single Unit Truck/Bus (12.5 m)	
Overall Length	12.500m
Overall Width	2.500m
Overall Body Height	4.300m
Min Body Ground Clearance	0.490m
Track Width	2.500m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12.500m

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SCALE 1:500 (m)

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SCALE IN METRES - 1:500

SHEET SIZE A1

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CONTRACT TITLE: WESLEY VALE DEVELOPMENT

STATUS: INFORMATION ONLY

DRAWING TITLE: SWEPT PATH ASSESSMENT
12.5m SEMI TRAILER SWEPTH PATHS

DATUMS: AHD/GDA20-MGA55

CLIENT No.

DRAWING No. S-P.25.1474-00-CIV-DRG-1902

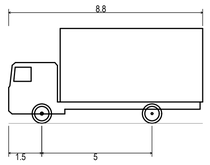
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DESIGN VEHICLE



Service Vehicle (8.8 m)	
Overall Length	8.800m
Overall Width	2.500m
Overall Body Height	4.300m
Min Body Ground Clearance	0.427m
Track Width	2.500m
Lock-to-lock time	4.00s
Curb to Curb Turning Radius	12.500m



SWEPT PATH ASSESSMENT

SCALE 1:500 (m)

REFERENCE FILES ATTACHED: S-P.25.1474-00-CIV-XRF-1950; S.P.25.1474.01-CIV-XRF-1110; S-P.25.1474-00-CIV-XRF-1500; S.P.25.1474.01-CIV-XRF-1125; S.P.25.1474.01-CIV-XRF-1110-CAD; SK-006b-PROPOSED SITE PLAN

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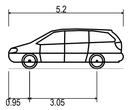
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8.8m SERVICE VEHICLE SWEPT PATHS

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DESIGN VEHICLE



Passenger vehicle (5.2 m)	
Overall Length	5.200m
Overall Width	1.940m
Overall Body Height	1.804m
Min Body Ground Clearance	0.295m
Track Width	1.840m
Lock-to-lock time	4.00s
Curb to Curb Turning Radius	6.300m



SWEPT PATH ASSESSMENT

SCALE 1:500 (m)

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DRAWING TITLE: SWEPT PATH ASSESSMENT
5.2m PASSENGER VEHICLE SWEPT PATHS

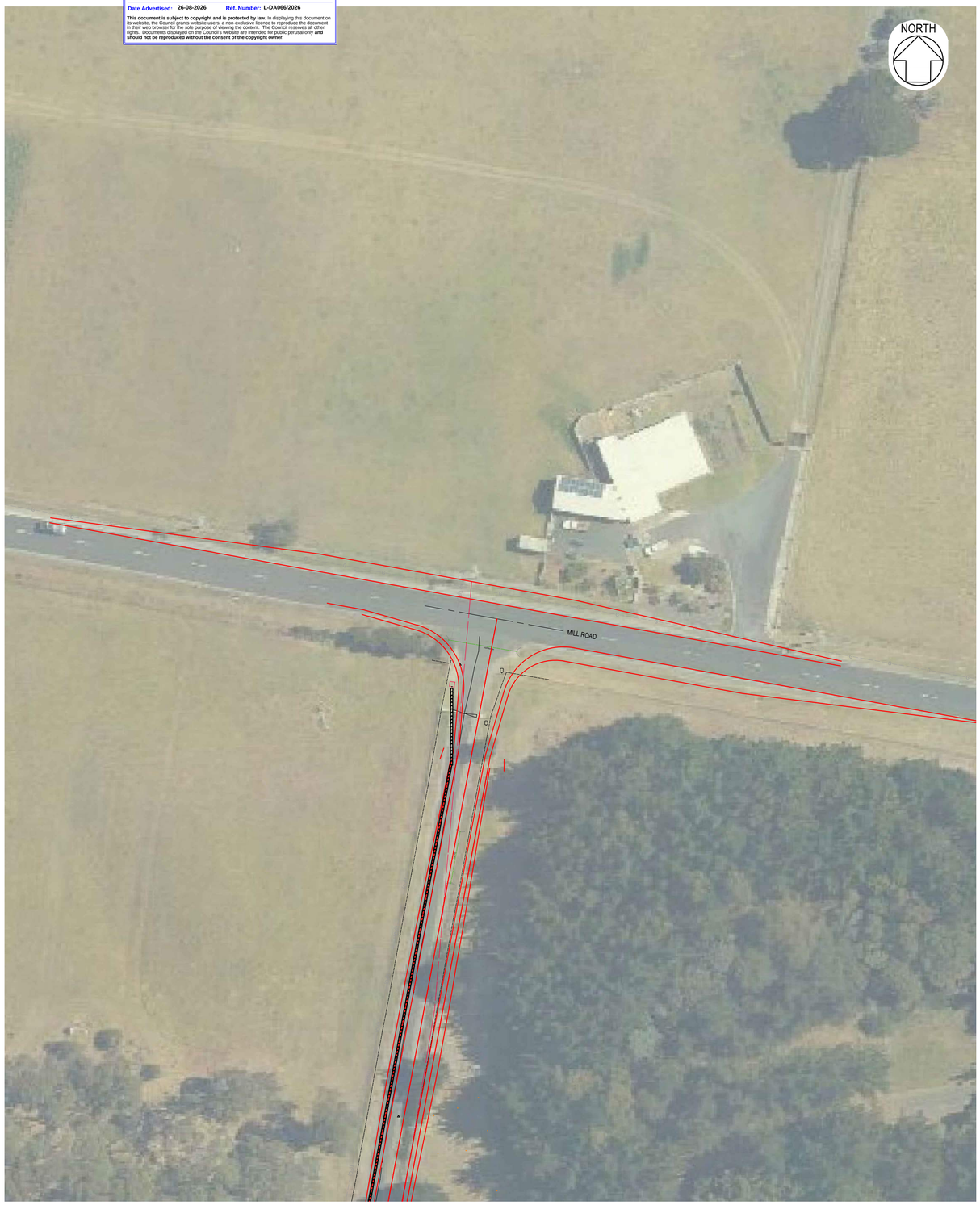
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STORMWATER LAYOUT

SCALE 1:500 (m)

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CONTRACT TITLE: WESLEY VALE DEVELOPMENT
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Firmus - Wesley Vale Development

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ABN 67 140 184 309

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info@pittsh.com.au
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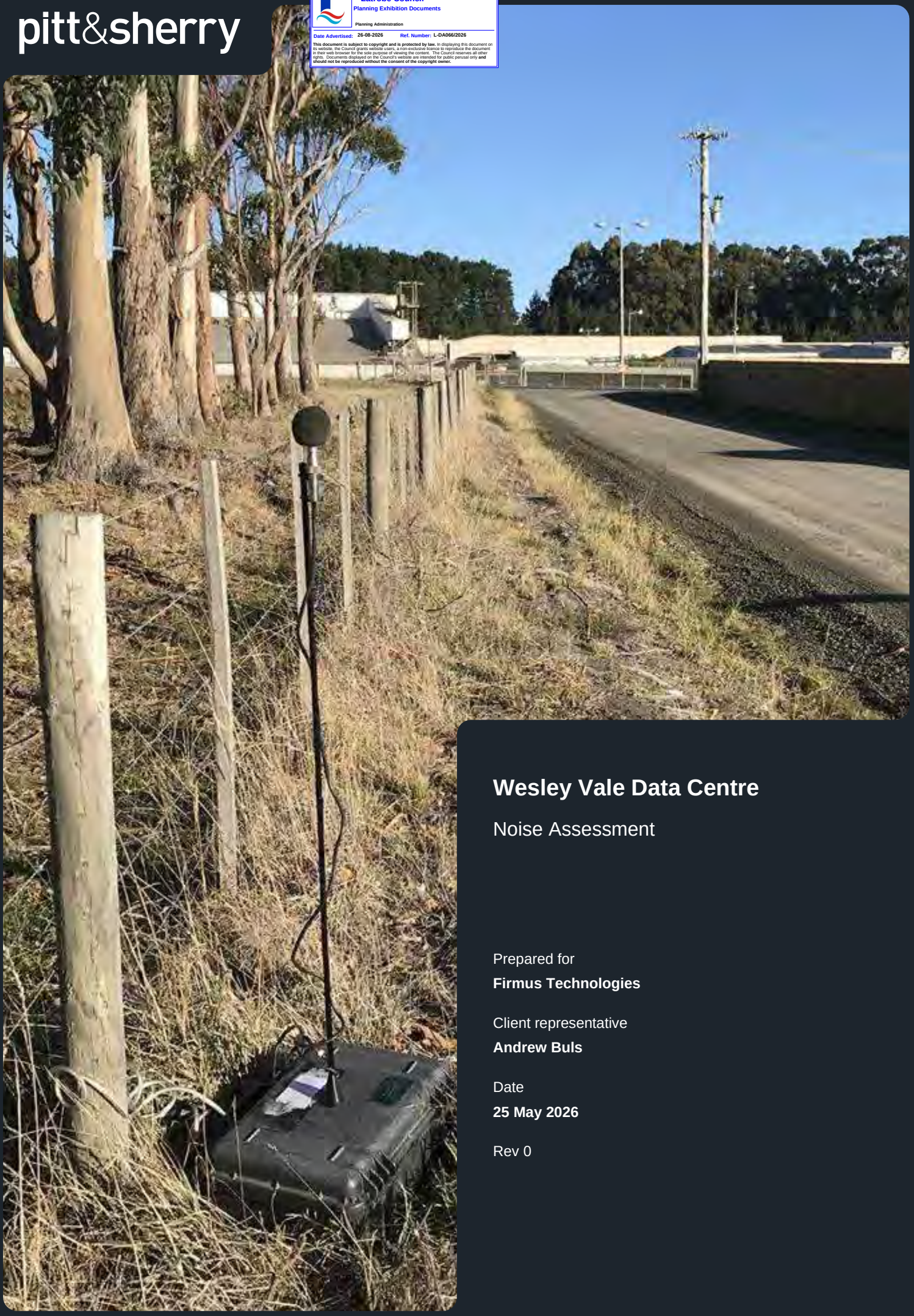
Noise Assessment

Appendix D

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Wesley Vale Data Centre

Noise Assessment

Prepared for
Firmus Technologies

Client representative
Andrew Buls

Date
25 May 2026

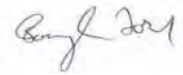
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   5.3 Methodology and assumptions 6
   5.4 Predicted noise levels 7
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Appendix A - Firmus Technologies, Project DPO01 – Wesley Vale Data Centre: Operational Noise Report V1

Prepared by — Alexander Seen		**Date** — 25 May 2026
Reviewed by — Douglas Ford		**Date** — 25 May 2026
Authorised by — Andrew Buckley		**Date** — 25 May 2026

Revision History

Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
0	Issued	A. Seen	D. Ford	A. Buckley	25/05/2026

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Executive Summary

This noise assessment has been prepared to support a development application for a data centre at Mill Park, 226 Mill Road, Wesley Vale. Data centres incorporate large-scale cooling systems and backup generators, both of which have significant, industrial-scale, noise emissions that must be appropriately managed.

The proposed site is located in the southeastern corner of the Mill Park industrial precinct, in an undeveloped area adjacent to the TasNetwork's substation. The industrial precinct is primarily used as a transport and logistics hub for a range of businesses. The BioMar fish feed manufacturing facility is located within the same *General Industrial* zone, 650 metres East of the site and the Devonport Airport is located approximately 1.6km to the Northwest.

The area surrounding the site is predominantly zoned *Agriculture* under the *Tasmanian Planning Scheme – Latrobe*. A small number of sensitive receivers, all residences, are located within 1km of the proposed site. Additional sensitive receivers within *Rural* and *Village* zones, include residences within the main area of Wesley Vale and the Andrews Creek Primary School. These are located approximately 1.5km southeast of the site.

Modelling of potential noise emissions from the proposed development was undertaken in the SoundPLAN environmental noise modelling software package, using preliminary noise data provided by the cooling equipment suppliers. Predicted noise levels at nearby sensitive receivers do not exceed the background noise levels by more than 5 dB(A), although inclusion of some additional noise attenuation, in order to increase the "safety margin" of the level of noise emissions, compared with the background plus 5 dB(A) criteria, is recommended.

It is concluded that noise emissions, at this level, from the proposed facility will not cause a significant loss of amenity or environmental nuisance at any nearby sensitive receivers, due to noise.

Revision of the modelling is strongly recommended prior to completion of the detailed design stage, to ensure that the predicted noise levels are achieved by the completed installation.

Authors' Qualifications and experience

Douglas Ford

(Bachelor of Engineering (Mechanical), University of Queensland, MIEAust, CPEng, RPEQ)

Doug has over 30 years' mechanical engineering experience working in design, technical support, research, maintenance and project management roles. He has 13 years' experience in the area of writing noise assessments in support of planning permit applications in Tasmania, industrial and traffic noise modelling and the design of noise attenuation measures for industrial and commercial building applications. He has appeared as an expert witness before the Tasmanian Civil and Administrative Tribunal on a number of occasions and submitted numerous assessment reports to the Tasmanian EPA. He also has significant experience modelling and assessing other emissions including dust, odour, airborne chemical pollutants, and nuisance lighting.

Alexander Seen

(Bachelor of Engineering (Marine and Offshore Engineering), Australian Maritime College)

Alex has 4 years' experience undertaking noise measurements, noise modelling and writing noise assessments. Under the supervision of Douglas Ford, he has completed a wide range of projects including assessments of industrial and commercial developments, residential subdivisions and road upgrades.

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1. Introduction

This noise assessment has been prepared to support a development application for a data centre at Mill Park, 226 Mill Road, Wesley Vale. Data centres incorporate large-scale cooling systems and backup generators, both of which have significant, industrial-scale, noise emissions that must be appropriately managed.

The proposed site is located in the southeastern corner of the Mill Park industrial precinct, in an undeveloped area adjacent to the TasNetwork's substation. The industrial precinct is primarily used as a transport and logistics hub for a range of businesses. The BioMar fish feed manufacturing facility is located within the same *General Industrial* zone, 650 metres East of the site and the Devonport Airport is located approximately 1.6km to the Northwest.

The area surrounding the site is predominantly zoned *Agriculture* under the *Tasmanian Planning Scheme – Latrobe*. A small number of sensitive receivers, all residences, are located within 1km of the proposed site. Additional sensitive receivers within *Rural* and *Village* zones, include residences within the main area of Wesley Vale and the Andrews Creek Primary School. These are located approximately 1.5km southeast of the site. The location of the site and surrounding area are shown in Figure 1.

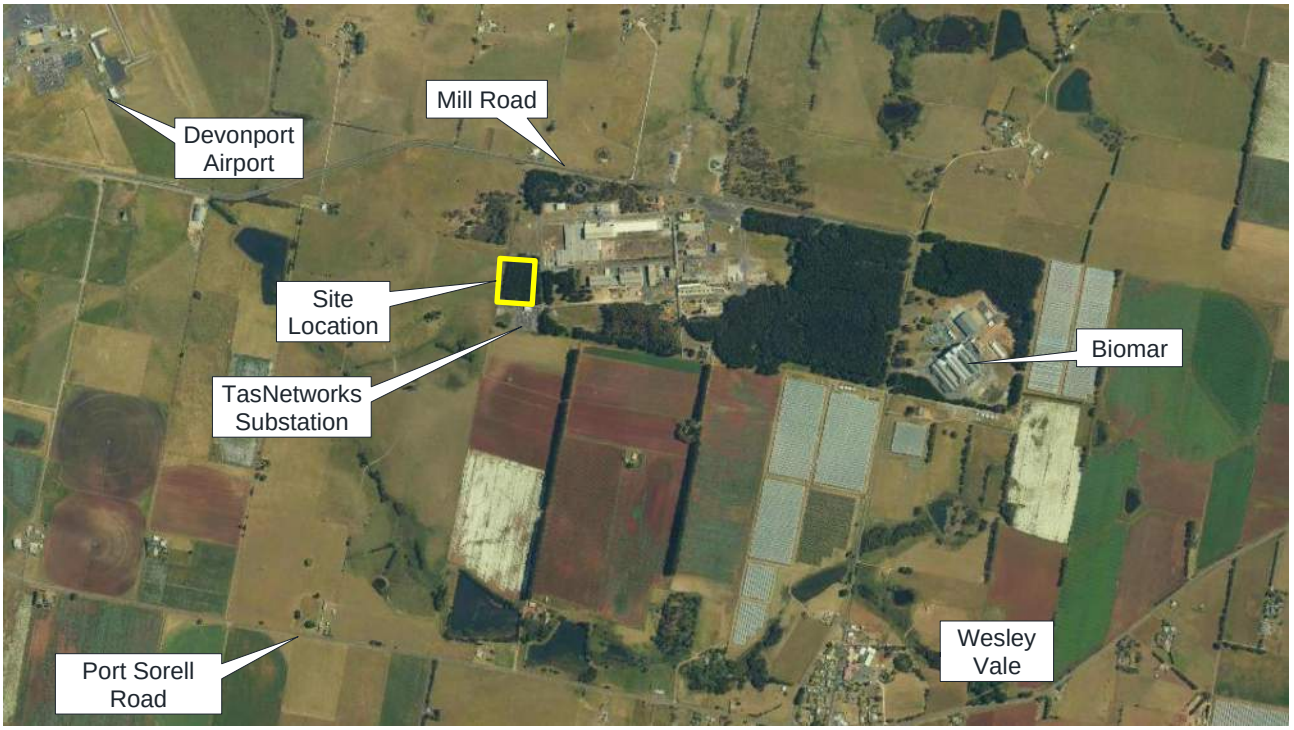


Figure 1: Aerial view of proposed site location and surrounding area (base image from theList).

2. Site description

The proposed development consists of a data centre incorporating a new security building, one modular "data hall" building housing the server infrastructure and a large hardstand area accommodating outdoor cooling units and emergency backup power generators. The data centre design utilises water cooling for cooling chip boards. Chillers mounted on the roof of the modular data halls will be used for maintaining air temperature within the data halls, with fan forced adiabatic air coolers used to cool the water cooling circuit used for cooling the computing chips.

The data centre and its cooling system operates 24 hours per day, however the cooling system will generally not run at full power, unless the ambient air temperature is above 27ºC, which means this only occurs over the warmer months of the year and rarely at night. Details on the expected equipment operating levels and likely occurrences of worst case scenarios are outlined in *Firmus Technologies, Project DPO01 – Wesley Vale Data Centre: Operational Noise Report V1,* included in Appendix A.

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The cooling and power backup infrastructure supporting this system consists of the following major plant components:

JAEGGI Adiabatic Coolers: 20 units are positioned externally to the northeast of the main buildings. Each unit has four large (diameter 2.15m) fans, that draw air in through the sides of the units and discharge it vertically through the top.

Smardt Evaporative Chillers: 20 units are positioned on the roof of the modular data hall buildings. Each unit has six, 960mm diameter fans, which draw air in through the sides of the unit and discharge it vertically through the top.

ElectropaK Generators: 40 units, are located externally to the southwest and northeast of the main buildings. The components that make up each unit are housed in shipping containers (mounted on top of each other). Each unit includes a diesel generator, a fuel tank and a battery system, with the exhaust discharged through a silencer mounted on top of the upper shipping container. Generators will only be operational during power outages. The total includes several stand-by units, so only 30 units will operate simultaneously.

Figure 2, below, shows the installation locations of the major items of equipment. Examples of the cooling units are also shown in Figure 3.

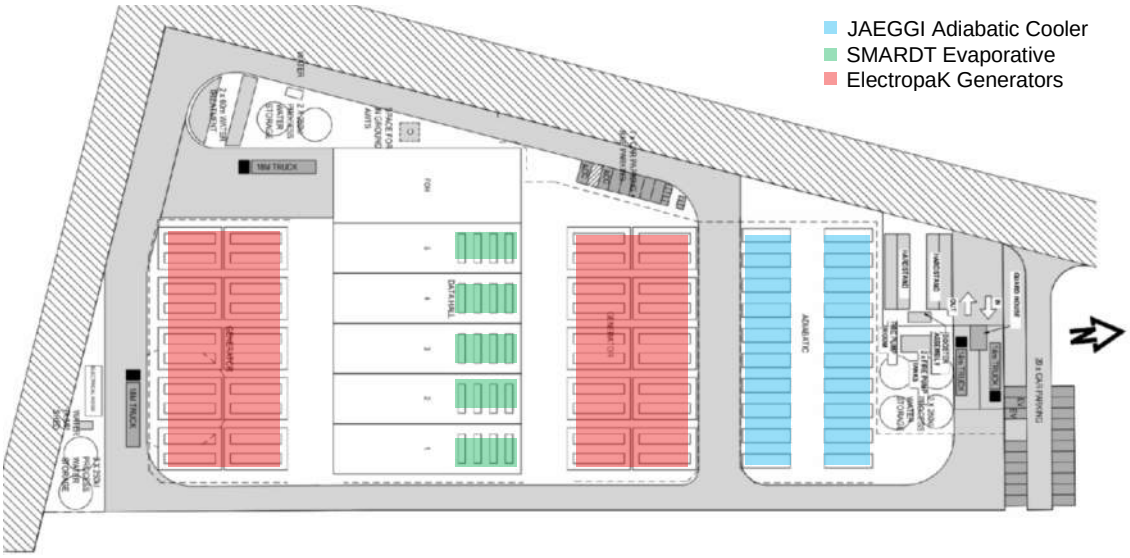


Figure 2: Cooling and power backup plant installation locations



Figure 3: Photos of cooling equipment. Left: JAEGGI Adiabatic Cooler, Middle: SMARDT evaporative chiller, Right: ElectropaK Generator and Battery System, fitted with noise attenuator.

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3. Tasmanian Planning Scheme

Data centres do not fit neatly into the use definitions within the *Tasmanian Planning Scheme*. For the purpose of this assessment, the use has been classed as “Utilities”.

Within the *General Industrial* Zone the proposed activity is classed as permitted and as such no requirements are given with regards to noise emissions form the site. Similarly, there is no activity listed in *Table C9.1* of the *Attenuation Code,* that corresponds to a data centre, despite the significant noise emissions, typically generated by data centre cooling systems.

In lieu of specific requirements under the planning scheme, a noise assessment has been undertaken to predict the level of noise emissions from the site and ensure that operation of the data centre does not cause an unreasonable loss of amenity to nearby residences. Criteria for the assessment are discussed, below.

4. Existing noise environment

The existing noise environment at the nearest receivers is predominantly comprised of noise from traffic along Mill Road (approximately 1,350 vehicles per day and 100 km/h speed limit) and Port Sorell Road (approximately 5,100 vehicles per day and 80km/h), particularly heavy vehicles travelling along Mill Road. Other noise sources include activities occurring at the industrial precinct, Devonport Airport and surrounding farms, along with general residential and environmental noise (i.e., wind blowing through trees, birds and insects etc).

Noise logging has previously been conducted at the nearest residence on Moorland Road and on the Southern boundary of the industrial park for previous projects in the area and results are given in Table 1, below. Noise levels at Moorland Road are considered representative of properties along Port Sorell Road, south of the site and noise levels obtained at the southern boundary representative of receivers some distance from roadways and other activities.

Table 1: Previous measured noise levels.

Time Period	Ambient $L_{eq,\ 10min}$	Background $L_{90,\ 10min}$	Maximum $L_{max,\ fast}$
7 Moorland Road (17/6 – 24/6 2024)			
Day (7am – 6pm)	53.0	30.8	94.1
Evening (6pm – 10pm)	47.0	30.1	88.2
Night (10pm – 7am)	40.7	32.5	77.7
Southern Boundary (17/6 – 24/6 2024)			
Day (7am – 6pm)	46.8	37.4	83.4
Evening (6pm – 10pm)	39.3	31.5	63.9
Night (10pm – 7am)	37.5	27.4	79.5

L_{eq} is the “equivalent continuous noise level” which can be thought of as the average noise level over a specific period of time[1]. L_{max} is the maximum noise level recorded in a specific period of time. The background noise level, also known as the “L_{90}”, is defined as the noise level in a specific period of time, that is exceeded by 90% of the noise levels measured in that time.

[1] Noise levels measured in decibels are averaged logarithmically.

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5. Noise assessment

5.1 Noise assessment criteria

Environmental protection policy (Noise)

The Tasmanian Environmental Protection Policy (Noise) 2009 (the EPP) has general provisions for the regulation of proposed commercial / industrial noise sources with the objective of protecting environmental values. In summary, it requires:

- Best practice environmental management to be employed to reduce noise emissions, to the greatest extent that is reasonably practical
- Dominant or intrusive noise characteristics of noise emissions to be reduced to the greatest extent that is reasonably practical; and
- That a "reserve capacity" in the acoustic environment is retained at any location, such that the combined noise from a number of activities does not prejudice the protection of environmental values at that location.

The EPP also provides acoustic indicator levels for various noise sensitive activities, based on World Health Organisation research. These indicators relate to the total ambient noise levels at a sensitive receiver, not just the noise from the industrial source being assessed. Indicators relevant to this noise assessment include:

- Outdoor Living Areas (Serious annoyance, daytime and evening) — 55 dB(A) $L_{eq,16hours}$
- Outdoor Living Areas (Moderate annoyance, daytime and evening) — 50 dB(A) $L_{eq,16hours}$
- Outside Bedrooms (Sleep disturbance, windows open, night-time) — 45 dB(A) $L_{eq,8hours}$, 60 dB(A) L_{max}
- Inside Bedrooms (Sleep disturbance, night-time) — 30 dB(A) $L_{eq,8hours}$, 45 dB(A) L_{max}

Intrusiveness Criteria

In addition to the EPP guideline levels, an activity may be considered intrusive, or liable to cause annoyance or loss of amenity, if the noise level from the activity exceeds the background noise level (without the activity) by 5dB(A) or more.

This measure has been adopted in the NSW noise policy for industry and in various planning schemes, although it has not been specifically incorporated in Tasmanian state noise policy.

EMPCA Noise Regulations for Fixed Plant

Unless a permit is issued which includes noise control measures, the requirements of Regulation 7 of the Environmental Management and Pollution Control (Noise) Regulations 2016 (EMPCA) Part 2, apply to any noise emissions from fixed equipment. This regulation limits noise emissions from fixed equipment to no greater than:

- 45 dB(A) from 7am to 10pm, and
- 40 dB(A) from 10pm until 7am, as measured at any nearby residence.

Limits adopted for this assessment

As the EMPCA limit of 40 dB(A) is significantly greater than the background noise level and could potentially result in on-site plant being significantly audible at nearby residences, the background + 5 dB(A) "intrusiveness criteria" has been adopted for this assessment. This criteria has previously been adopted for assessment of similar sites. Based on night-time noise levels this provides a noise limit of:

- 35.1 dB(A) for houses along Mill Road, north of the site, and Port Sorell Road to the south, and
- 32.4 dB(A) at houses south of the site, away from roadways and other activities.

Adoption of these limits would ensure that the site complies with the EMPCA regulations and would ensure that noise from the site would not cause a noticeable increase to ambient noise levels, noting that these levels already exceed relevant EPP indicator levels in some locations by a small margin.

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5.2 Noise sources

At the time of writing this report, the design of the proposed data centre has been completed to a concept design level. This includes preliminary selection of major cooling system plant components and generators. However, detailed design, including final specification of the cooling plant, and availability of certified equipment noise data, has not yet been completed and as such noise characteristics of the final selected equipment may vary.

All noise sources have been characterised with sound power levels from catalogue noise data provided by the manufacturers of the proposed equipment, operating at full power (100% capacity). Details of the equipment suppliers' noise source data is included in this assessment are listed in Table 2 below.

Previous, similar, assessments undertaken for proposed FIRMUS developments at St Leonards, Launceston, identified requirements for noise mitigation measurements on the adiabatic coolers and diesel generators, including selection of quieter fans and fitting of attenuators. Data has been provided by equipment suppliers of reduced sound power levels with these measures in place. These levels have been used for this assessment.

Table 2: Equipment noise source details

Source	Qty.	Sound Power Level – dB(A)	Height above ground – m
JAEGGI Adiabatic Coolers[2]	20	80.0	3.8
Smardt Evaporative Chillers[3]	20	85.8	12.7
ElectropaK Diesel Generator[4]	40 Total (30 Operational)	89.2	6.2

All noise sources have been represented in the model using single octave band spectral data. The noise sources have been assumed to be generally broad band in nature, without any significant tonality, impulsiveness or modulation. Corrections have been applied where required for low frequency noise as per the Tasmanian DEPHA *Noise Measurements Procedure Manual, 2008*. Once construction is complete, there will be no significant mobile plant usage on site, with the only regular traffic movements limited to light vehicles used by operations and maintenance staff.

Based on analysis of the typical weather conditions and occurrence of power outages in *Firmus Technologies, Project DPO01 – Wesley Vale Data Centre: Operational Noise Report V1*, operation of the equipment at rated capacities will occur less than 1% of the time. Typically, adiabatic coolers and evaporative chillers will operate between 30% - 70% of rated capacity during the day and 20% to 50% overnight, providing a significant reduction in noise emissions. Generators will only be operated for testing purposes or during an electricity supply outage.

5.3 Methodology and assumptions

Noise modelling was carried out in accordance with the *Noise Measurement Procedures Manual*. Noise level calculations were implemented using SoundPLAN 9.1 environmental noise modelling software. Modelling assumptions and settings include:

- The ISO 9613-2 noise calculation standard was used within SoundPLAN
- Existing buildings, roads and other permanent structures and features were included within the model. All building footprints were sourced from *theList*.
- Existing terrain topography was obtained from 2 metre LIDAR data sourced from the ELVIS online elevation database.
- A ground absorption factor of G=0 (i.e.100% hard) was used for the sealed areas of the industrial park, with a factor of G=0.8 (80% soft / 20% hard) used throughout the remainder of the model.

[2] JAEGGI Quotation No. 9049 V5.1 Page 5. Dated: 17 November 2025
[3] SMARDT 500kW EB060.2A.F4AEHA.ES06DE.E10 Evaporative Chiller Specification Dated: 1 May 2026
[4] JLE 1000037479 WPS2500S-AU Noise Test Report. Dated: 6 May 2026

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Three scenarios were modelled;

- Scenario 1: With all of the adiabatic and air cooled chillers operating, but without the generators operating.
- Scenario 2: With all adiabatic and air cooled chillers operating and with all the generators operating.
- Scenario 3: With all adiabatic and air cooled chillers operating and with only three out of every four generators operating. (representative of site operations during a power outage.)

The layout of the SoundPLAN noise model is shown in Figure 4, below.

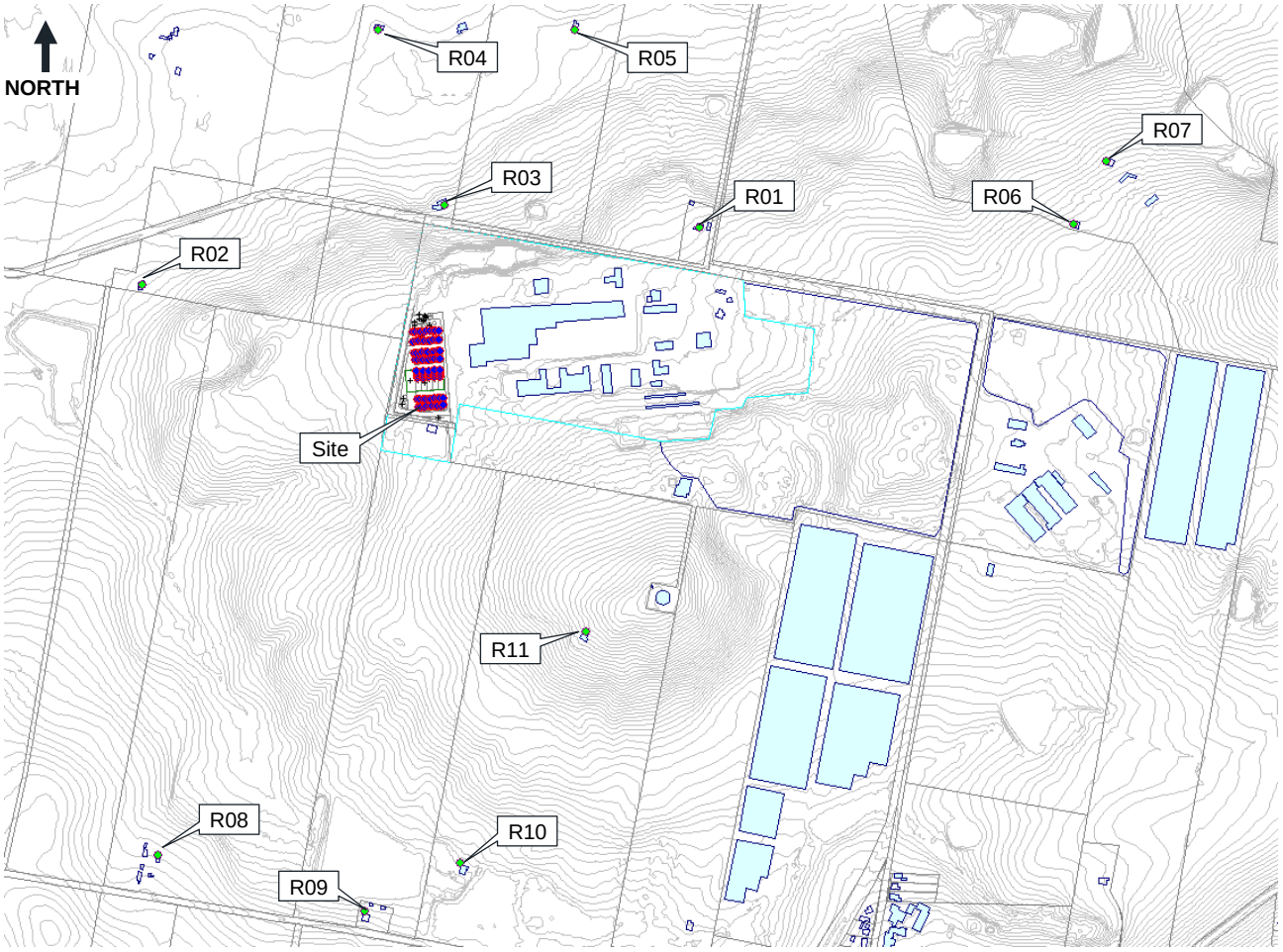


Figure 4: SoundPLAN noise model layout.

5.4 Predicted noise levels

The predicted noise levels for the modelled scenarios are given in Table 3, below. Noise contour maps, showing the predicted distribution of noise levels from the site are given in Figures 5, 6 and 7. Receivers reported in Table 3 are key receivers, typically the closest to the site in each direction and representative of the noise levels in the surrounding areas. Noise levels at other locations may be interpreted from the noise contour maps. Note that due to limitations of the contour plotting process used, slight discrepancies may occur between the levels given in Table 3 and those predicted by the noise gird map. In these cases, noise levels from Table 3 take precedence.

As identified previously, noise levels used are based on equipment operating at 100% capacity / the rated output. This only occurs when the temperature exceeds 27 degrees Celsius. This will typically only occur a limited number of times throughout the year, primarily during the daytime. As such the predicted noise levels have a degree of conservativeness incorporated.

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Noise levels for all scenarios are less than the night-time background + 5 dB(A) criteria at all locations by a small to moderate margin. This relies heavily on the accuracy of the noise equipment data provided, including of the octave band spectrum data provided. If actual equipment sound characteristics were to vary from the details used, there would be potential for the site noise levels to exceed the background + 5 dB(A) noise limit.

Table 3: Predicted noise levels

Receiver		Noise Criteria (L_{90} + 5) dB(A)	Without Generators dB(A)	With All Generators dB(A)	With 1 in 4 Generators in Standby dB(A)
R01	7 Moorland Rd	35.1	25.8	30.4	29.7
R02	118 Mill Rd		25.3	29.6	28.9
R03	187A Mill Rd		28.2	31.0	30.4
R04	187B Mill Rd		27.2	30.5	29.8
R05	213 Mill Rd		23.6	28.2	27.5
R06	303A Mill Rd		17.2	21.6	20.8
R07	303B Mill Rd		16.5	20.7	20.0
R08	455 Port Sorell Rd		21.6	26.4	25.4
R09	479 Port Sorell Rd		18.1	23.6	22.7
R10	503 Port Sorell Rd		18.8	24.4	23.5
R11	503A Port Sorell Rd	32.4	24.9	30.5	29.5

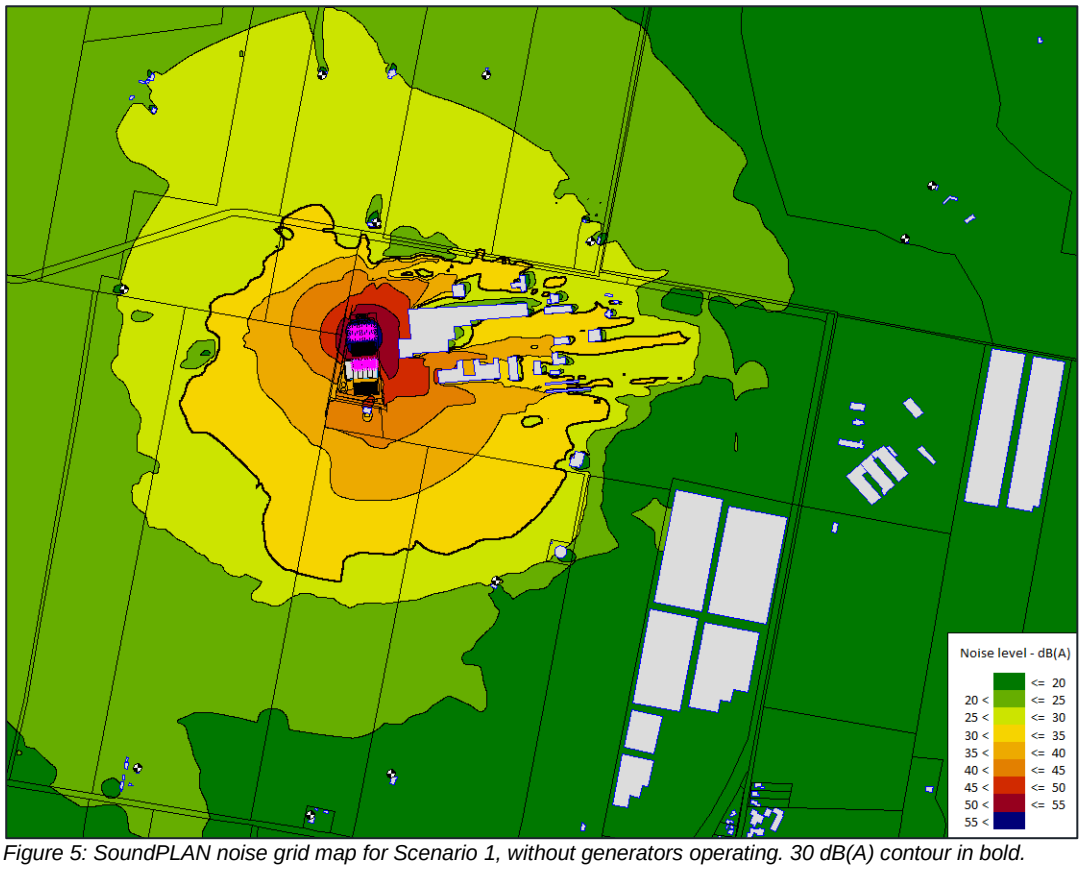


Figure 5: SoundPLAN noise grid map for Scenario 1, without generators operating. 30 dB(A) contour in bold.

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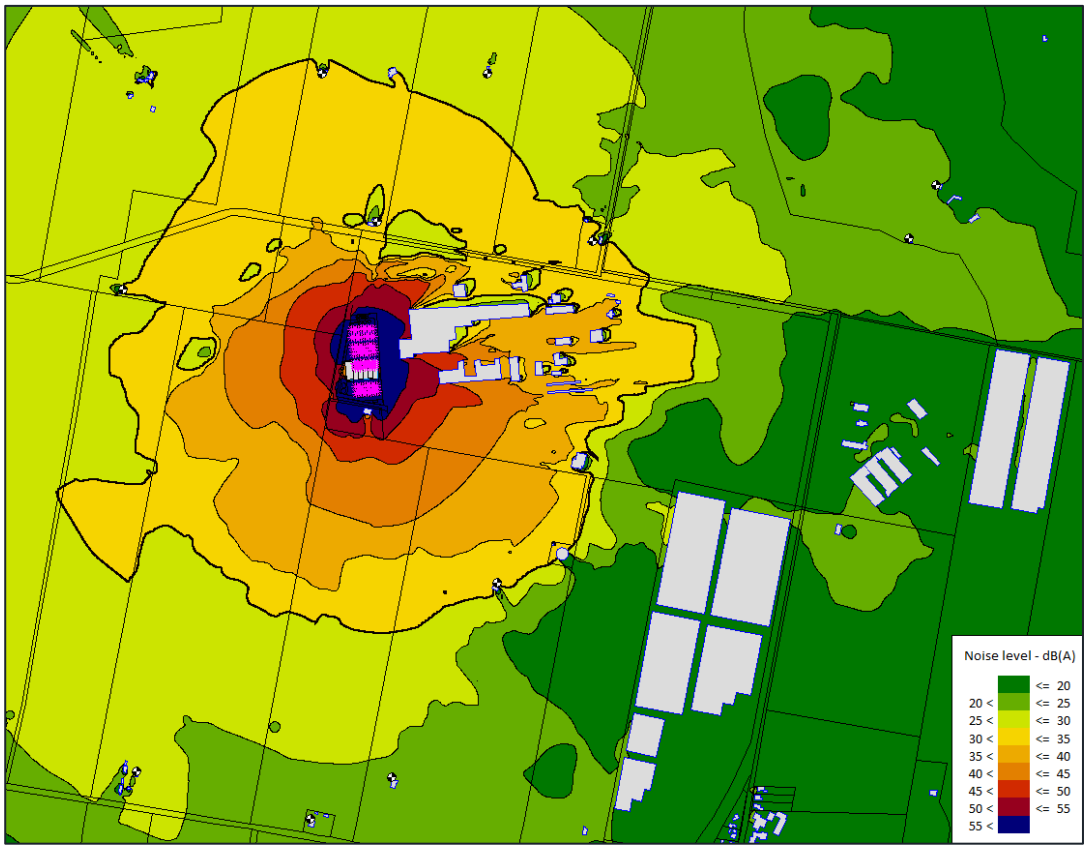


Figure 6: SoundPLAN noise grid map for Scenario 2, with all generators operating. 30 dB(A) contour in bold.

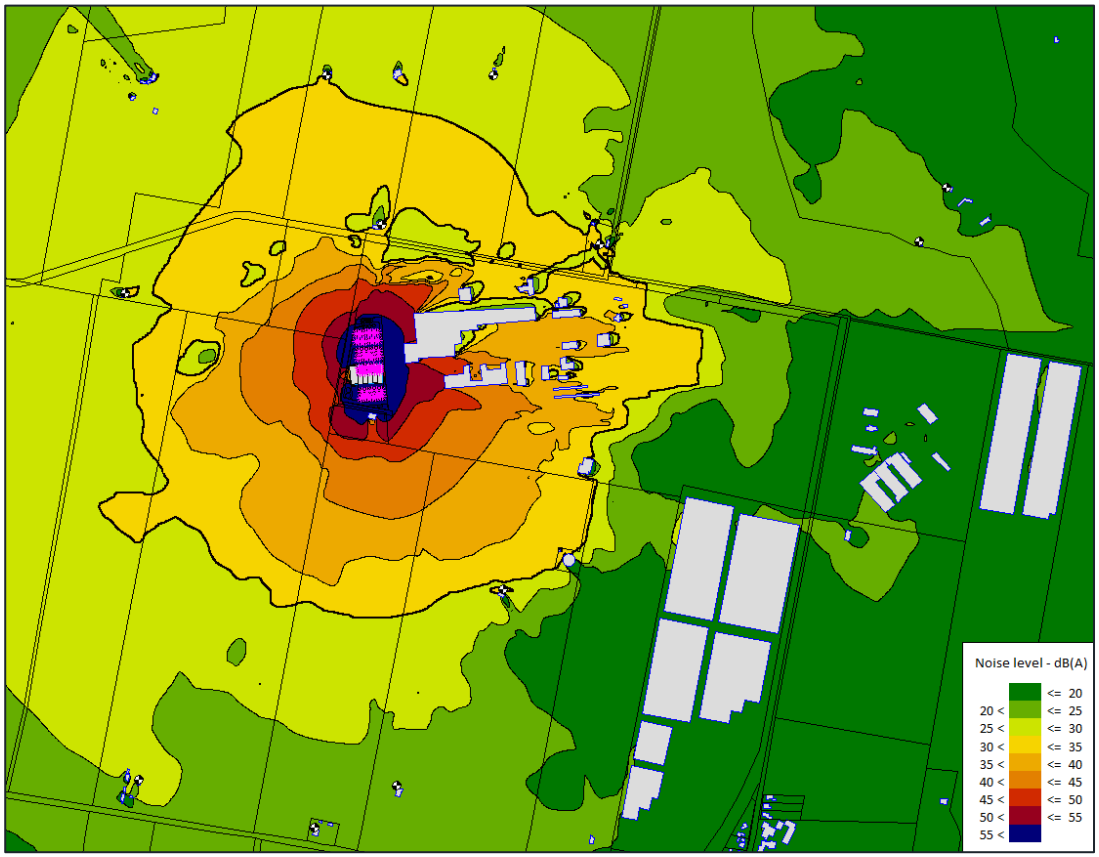


Figure 7: SoundPLAN noise grid map for Scenario 3, with 1 in 4 generators in standby. 30 dB(A) contour in bold.

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5.5 Recommendations

It is recommended that this noise assessment is updated before the detailed design and confirmation of equipment supply is finalised, to ensure that the predicted noise levels are achieved. Elements of the noise data provided by suppliers are noted to be estimated. It is recommended that procurement arrangements for the equipment include provision of certified noise data and / or noise performance guarantees. Noise data should include one third octave band sound power level data, measured at well-defined locations, suitable for modelling far field noise levels (i.e., 10 to 20 metres) and include equipment operating at full rated capacity and at partial loads (i.e., 50 and 75%). One third octave band data is necessary, in order to determine if penalties for tonality are required, in accordance with the *Noise Measurement Procedures Manual*.

As the predicted combined noise level of the data centre is very close to the background + 5 dB(A) target level, it is recommended that additional noise mitigation measures are applied to the emergency generators to achieve a sound power level of 85 dB(A). This would allow for issues such as periods of unusually high noise propagation or equipment noise emissions that are higher than predicted by the manufacturer's catalogue data or that change over time.

The following "good practice" noise mitigation measures should be adopted to ensure that noise emissions from the site meet the calculated levels.

- All plant and equipment should be maintained in good order at all times, especially noise control devices such as exhaust mufflers, silencers and acoustic louvres; and
- If plant layout is altered or any new external equipment is to be added to the facility or replaced with different types, in the future, the noise impact of this equipment should be carefully considered.

5.6 Construction noise

Construction will be undertaken using standard commercial building techniques. No excessively noisy techniques are anticipated. All building work will be carried out between the hours of 7am and 6pm, Monday to Saturday. As such noise and vibration from construction work are not expected to be noticeable at any nearby residences, above the normal daytime ambient noise.

6. Conclusion

Based on the noise modelling undertaken, it is concluded that noise emissions from the proposed facility will not exceed the background noise levels by more than 5 decibels at the nearest residences. As such the site will not cause a significant loss of amenity or environmental nuisance due to noise, at any nearby sensitive receivers.

As this noise assessment is based on preliminary noise data and a preliminary layout, it should be revised and updated as the design progresses.

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Appendix A

Firmus Technologies, Project DPO01 – Wesley Vale Data Centre: Operational Noise Report V1

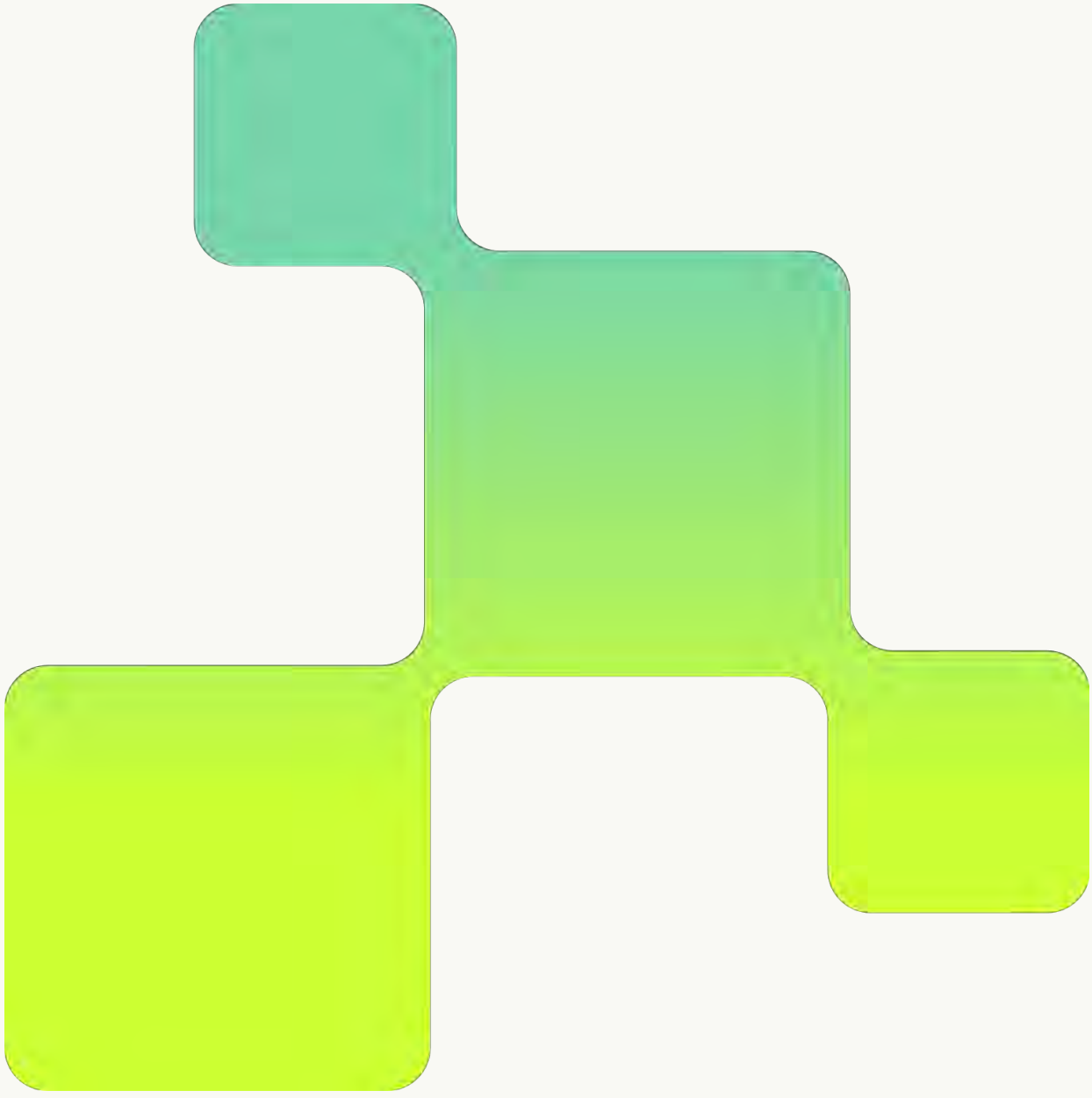
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firmus

Operational Noise Report

Project DPO01 - Wesley Vale Data Centre, Tasmania



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Firmus
#13-01 UIC Building, 5 Shenton Way
Singapore, 068808

Author: Hamish Kerr (Firmus Mechanical)

Revision Control

Version	Change	Date	Author	Reviewed By
0.1	Initial draft - operational noise narrative	19 May 2026	Hamish K	HK
1	Published	22 May 2026	Hamish K	HK
2	Updated generators numbers	25 May 2026	Hamish K	HK

1. Purpose

The purpose of this report is to outline the operational nature of Project DPO01 - the Wesley Vale Data Centre in northern Tasmania - and to provide the acoustic consultant engaged for the site with a defensible, source-by-source picture of how the principal noise-emitting plant items are intended to operate. It walks through each plant item in turn (generators, adiabatic coolers [ADC], roof-mounted chillers) and describes how the site actually runs over a typical 24-hour cycle and on the design (worst) day, with explicit attention to overnight operation and to how the plant responds to ambient conditions, IT load and operator set-points.

DPO01 is a staged development. The Day 1 deployment caters for an approximate site IT load of 25 MW. The Day 2 deployment augments the approximate site IT load to 50 MW. Both phases are addressed in this report, with the Day 2 case being the controlling noise scenario.

Two operational cases are framed within each phase: a Worst Case (the short-duration, design-day combination of plant outputs at all units simultaneously) and a General Operational Case (representative of nearly all hours of the year, including every overnight period). The intent is to give the acoustic assessor a reasonable operating envelope to model against, rather than a blanket "all plant at full output, all of the time" assumption.

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Firmus
#13-01 UIC Building, 5 Shenton Way
Singapore, 068808

2. Basis of Assessment

2.1 Reference climate - Wesley Vale (Devonport, WMO 959600)

The Wesley Vale site is located in northern Tasmania at approximately 7 km east of Devonport Airport and ~3 km south of Bass Strait. Operating duties for DPO01 have been derived from the 2025 ASHRAE Handbook climatic design conditions sheet for Devonport (WMO 959600), the nearest long-record reference station to the site. The reference period for the ASHRAE design conditions is 1999-2023 (Grade A). All values in the table below have been cross-checked against weather records for Devonport across five rolling 15-year vintages (2004-2018, 2007-2021, 2009-2023, 2011-2025, all of which support ASHRAE design conditions.

Key climate values used in this report are summarised below.

Parameter	**Value (Devonport WMO 959600, 2025 ASHRAE Handbook & TMYx)**
Cooling design dry-bulb (0.4% / 1% / 2%)	23.4 / 22.4 / 21.4 deg C
Cooling design coincident wet-bulb (0.4% / 1% / 2% DB)	17.9 / 17.5 / 17.0 deg C
Evaporation design wet-bulb (0.4% / 1% / 2%)	19.6 / 18.9 / 18.2 deg C
Annual extreme dry-bulb (mean of annual extremes)	-0.3 deg C min / 26.8 deg C max
ASHRAE N=20 (DB/WB)	30.4 / 25.4 deg C
Annual mean dry-bulb	12.6 deg C
Hottest month (Jan) mean dry-bulb	16.8 deg C
Typical overnight (21:00-06:00) mean dry-bulb	Summer ~14-17 deg C; Autumn / Spring ~9-13 deg C; Winter ~8-9 deg C

The defining feature for noise is that Wesley Vale overnight conditions are mild and stable for the great majority of the year. Per the hourly statistics, summer overnight dry-bulb averages ~14-17 deg C, autumn / spring ~9-13 deg C, and winter ~8-9 deg C, with corresponding wet-bulb in the 7-13 deg C range. Both observations have direct consequences for fan-speed control (and therefore noise) on every cooling unit at the site.

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2.2 Equipment selection vs noise-assessment design point

The mechanical equipment for DPO01 has been selected against the ASHRAE n=20 design condition i.e. the one in twenty year extreme cooling condition - to ensure the plant has adequate capacity for the most severe weather events the site is expected to experience. This is the appropriate basis for sizing and capacity selection.

For the purposes of an operational noise compliance assessment, however, the n=20 condition is not a representative operating point. It corresponds to a handful of hours that may not occur in any given year. The recommended basis for practical noise limits is the less critical ASHRAE 0.4% annual cooling design condition (statistically the hottest ~35 hours of the year - at Wesley Vale: 23.4 deg C dry-bulb, 17.9 deg C wet-bulb), which is the worst case the plant is expected to experience routinely. All numerical day-time noise scenarios in this report are framed against the 0.4 % condition; the Worst Case used for the compliance model is itself based on the 0.4 % condition combined with all cooling units operating.

Adopting the 0.4 % rather than the n=20 condition for noise assessment is consistent with normal industry practice and reflects the fact that capacity (sized at n=20) and operating point (assessed at 0.4 %) are distinct engineering questions.

2.3 Server / IT operating profile

The IT load profile assumed in this report is based on the operation of existing clusters operational across the Firmus portfolio:

- Typical IT load: 75 % of nameplate.
- Diversity factor across all major cooling equipment: 0.75.

Applied to DPO01 the result is that, with very rare exception, the cooling plant is operating well below nameplate and at part fan speed. During every overnight period of the year, ambient is low and cooling plant is firmly in low-fan-speed dry-mode operation.

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2.4 Typical day vs night design points

The day/night design ambient conditions used to acoustically characterise the plant are derived from the Devonport ASHRAE monthly climatic design conditions cross-checked against hourly statistics for the same WMO station. The four seasonal day points are taken at the monthly 0.4 % cooling DB peak (with the matched mean coincident wet-bulb); the matched overnight points are the typical mean year mean dry-bulb at 03:00 for the same month.

Scenario	Hour	Dry-bulb deg C	Wet-bulb deg C
Summer Day (Jan)	15:00	25.8	17.8
Summer Night (Jan)	03:00	14.4	~12
Autumn Day (Apr)	15:00	20.7	16.2
Autumn Night (Apr)	03:00	11.3	~10
Winter Day (Jul)	15:00	14.7	11.3
Winter Night (Jul)	03:00	7.9	~7
Spring Day (Oct)	15:00	19.3	14.0
Spring Night (Oct)	03:00	8.3	~7

Across all four seasons the night-time dry-bulb at Wesley Vale is approximately 7-11 deg C cooler than the corresponding day-time peak (summer night ~11 deg C cooler than the day peak; winter night ~7 deg C cooler). Cooling plant is sized for the summer day point; at every other point it is operating with significant headroom and at correspondingly reduced fan speeds. The summer night dry-bulb of ~14.4 deg C is well below the 25.8 deg C adiabatic-cooler changeover. This indicates unit has sufficient head room for reduced fan speed operation.

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3. Noise-Emitting Plant Summary

The cooling and standby-power plant for DPO01 comprises of three principal noise-emitting source groups. Equipment models, treated per-unit sound power levels and the underlying acoustic-treatment package are the same across both stages.

3.1 Day 1 plant (5 x 5 MW low-capacity Hypercubes, ~25 MW IT)

Plant	Day 1 Qty	Per-unit duty	Lw per unit	Notes
Diesel generators	20	~2,500 kVA prime per unit	89.2 dBA Lw per unit	Sound Power Level targeting 85 dBA.
Adiabatic dry coolers	15	2,500 kW heat rejection per unit at 36.2 / 25.39 deg C ambient; adiabatic changeover 25.8 deg C	80 dBA Lw per unit	
Roof-mounted chillers	10	500 kWr per unit; chillers mounted on data-hall roof	85.8 dBA Lw per unit (with low-noise fan)	

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3.2 Day 2 plant (5 x 10 MW high-capacity Hypercubes, ~50 MW IT)

Day 2 is delivered by augmenting power from 25MW to 50MW. The augmentation adds 4 generators, 1 adiabatic coolers and 2 chillers per Hypercube.

Plant	Day 2 Qty	Lw per unit (unchanged)	Notes
Diesel generators	40	89.2 dBA Lw per unit	Sound Power Level targeting 85 dBA.
Adiabatic dry coolers	20	80 dBA Lw per unit	
Roof-mounted chillers	20	85.8 dBA Lw per unit (with low-noise fan)	

The Day 2 plant inventory is the controlling case for noise compliance at DPO01. The Day 1 inventory remains a relevant interim case for the period between initial commissioning and the second-phase augmentation.

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4. Operational Scenarios

4.1 General Operational Case

This case represents cooling plant operating at part-load and part-fan-speed rather than the rated full output, with no generators running. It is representative of >99 % of hours, including all overnight periods, and applies equally to the Day 1 and Day 2 inventory.

- IT load at typical 75 % of nameplate, with diversity 0.75 across cooling equipment.
- Ambient within the typical day or night design points in Section 2.4 - overnight always sub-15 deg C, often sub-10 deg C.
- Adiabatic coolers: 4 axial fans per unit modulated by VFD to part-speed (typically 30-60 % of full speed).
- Chillers: operating; evaporative pre-cool pads; 6 EC fans per unit on speed control following condensing pressure.
- Generators: off (utility supply only); off-load weekly exercise tests conducted during daytime hours.

4.2 Worst Case

The compliance worst case combines all cooling plant on full output with all generators on load. Both Day 1 and Day 2 inventories are addressed; Day 2 is the controlling compliance case.

Day 2 Worst Case (50 MW IT):

- IT load at design maximum.
- Ambient at the Wesley Vale 0.4 % cooling design
- All 20 adiabatic coolers operating with all 4 fans per unit at 100 % VFD speed
- All 20 chillers operating with all 6 EC condenser fans per unit at high speed
- Generators: 40 of 40 units on load.

Day 1 Worst Case (25 MW IT):

- IT load at design max
- Ambient at Wesley Vale 0.4 % cooling design.
- Failure mode: 10 adiabatic coolers at 100 % fan speed, dry mode.
- Failure mode: 10 chillers at high condenser-fan speed.
- Generators: 22 of 22 units on load.

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5. Standby Diesel Generators

5.1 Configuration and redundancy

The standby power system at DPO01 uses the same prime-rated diesel generato. Each generator is housed in its own stacked container package containing the engine and alternator, day fuel tank and a residential-grade exhaust silencer mounted on the upper container.

The Day 1 fleet is built up as follows:

- 5 x MW IT being served by a dedicated group of 4 generators arranged N+1 with N=3. Subtotal: 20 generators.

The Day 2 fleet is delivered by augmenting each IT group from N+1 with N=3 (4 generators) to N+2 with N=6 (8 generators) - i.e. adding 4 generators to each IT group:

- 5 x 10 MW IT each - each served by a dedicated group of 8 generators arranged N+2 with N=6. Subtotal: 40 generators.

The redundancy strategy is as follows: each generator group runs all units simultaneously to carry its load – hot standby. In the event we experience a failure of one supply, N units will run.

5.2 Adopted sound power level and 85 dBA package target

Firmus is actively engaged with the generator package supplier (JLE) to achieve a packaged sound power level of 85 dBA per unit - a further ~4.2 dBA reduction below the current 89.2 dBA Lw figure. This is targeted through enhanced enclosure, intake/discharge attenuator-bank refinement and additional acoustic treatment of the radiator path.

5.3 Real-world operating expectation

In normal operation generators are off. Audible generator noise is limited to:

- Scheduled, off-load weekly exercise runs of approximately two hours, conducted during business hours (08:00-17:00).
- Periodic on-load building load test (typically annually), again conducted during daytime hours.
- Genuine utility outage events. These are infrequent and not predictable; for noise compliance the worst-case scenario above is assessed continuously.

A site-specific assessment of incoming-supply reliability will be prepared for DPO01 by the network service provider. Pending that assessment, the design intent is that overnight residents and other sensitive receivers will not experience generator noise from the site under normal operating conditions.

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6. Adiabatic Coolers

6.1 How the coolers respond to ambient temperature

The adiabatic coolers are 15 of ADC closed-circuit coolers in Day 1, augmented to 20 off in Day 2. Each unit carries a duty of 2,500 kW heat rejection at the Firmus equipment-selection design point (36.2 / 25.39 deg C wet-bulb ambient) - materially more onerous than the actual Wesley Vale 0.4 % cooling design at 23.4 / 17.9 deg C. Each unit has 4 x axial fans driven by 7.5 kW motors at 358 rpm full-speed, VFD-controlled against the cooling-loop return temperature. With dry ambient and a fixed loop set-point:

- At low ambient (overnight, winter - which is the controlling condition for almost every hour of the Wesley Vale year) the available approach is very large; the required heat rejection can be met at very low fan speeds, often 20-40 % of full speed.
- At intermediate ambient (most of the year) fans run at part-speed, ramping smoothly with load and ambient.
- At high ambient (>25.8 deg C, i.e. above the Wesley Vale 0.4 % condition and only at the rare n=20-class events) fans run at or near full speed and the adiabatic spray is enabled.

Crucially, the night-time ambient at Wesley Vale is well below the 25.8 deg C in every season - typical summer overnight is 14-16 deg C, autumn / spring 8-12 deg C, winter 8-9 deg C. The units will therefore operate at significantly reduced fan speed for every overnight hour of the year. For the General Operational Case described in Section 4.1, fan-speed-derived noise at receivers is expected to be of order 10-20 dBA below the modelled (full-speed) envelope.

6.2 Silencing and conservatism

Per the latest ADC data sheet, the A-weighted sound power level of a single unit at full fan speed is 80 dBA.

The acoustic treatment philosophy adopted for DPO01 - quiet-fan selection combined with VFD part-speed operation as the primary in-service acoustic control - underpins this sound power level. Even with the 80 dBA figure applied to all 20 units simultaneously at full fan speed and on the design summer day, the modelled scenario is materially worse than anything the plant will experience in service - and by definition cannot occur overnight, when low Wesley Vale ambient drives the VFDs to part-speed and reduces real-world Lw further.

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7. Roof-Mounted Chillers

7.1 How the chillers respond to ambient temperature

The chillers are 10 off augmented to 20 off in Day 2. Each unit is mounted on the roof of the corresponding data-hall and is rated 500 kWr at the design ambient. Heat rejection is delivered through 6 high-static EC condenser fans per unit, with capacity controlled by compressor unloading and EC fan-speed modulation against condensing pressure. The behaviour over the Wesley Vale ambient envelope is:

- Low ambient (which dominates overnight) means low compressor power, and very low condenser-fan speed - the loudest fan source is therefore at part-speed when it does operate.
- High condenser-fan speed and full-load compressor noise occur only at the design summer day point and when the compute is operating at full load.

The unit A-weighted sound power level is 85.8 dBA per machine.

7.2 Silencing and perimeter noise wall

In addition to the package-level acoustic treatment, Firmus is proposing a perimeter sound-attenuation wall around the rooftop chiller plant area. The reference wall is 5,500 mm tall measured from the roof slab; with the chillers mounted on a 1,000 mm plinth, the wall extends a minimum of 1,000 mm above the condenser-fan discharge plane on every unit, such that the wall continues past the upper extent of every direct-radiating surface on the chiller package. The wall is designed primarily to:

- Block direct line-of-sight from the chiller casing to the nearest sensitive receivers, providing meaningful attenuation of casing break-out noise.
- Provide additional attenuation of the side-radiating component of the condenser fan discharge.
- Provide a controlled acoustic boundary against which the chiller package noise can be measured and verified during commissioning.

The wall provides margin on the casing-break-out, pipework and side-radiating components, and is proposed as an additional measure to mitigate sound propagation.

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8. Overnight Operation

The overnight period (22:00 - 07:00) is the most acoustically sensitive part of the day and has been examined explicitly. The four key observations are:

- Ambient: Overnight dry-bulb averages 14-17 deg C in summer and 8-9 deg C in winter. Wet-bulb is correspondingly low.
- IT load: typical operational IT loading at night is comparable to daytime but cooling demand for the same IT load drops significantly because the available approach to ambient is much larger.
- Cooling plant duty: adiabatic coolers always in running low fans at part-speed; chillers running at part-load with low condenser-fan speed.
- Generators: not in operation. Routine off-load test runs are scheduled within daytime business hours and are explicitly prohibited by procedure between 22:00 and 07:00 except in a genuine emergency.

In aggregate, the night-time noise contribution from DPO01 is expected to be dominated by part-speed adiabatic-cooler fans, with chiller and generator contributions absent or negligible. This contrasts directly with the modelled worst case, in which all cooling plant is at full output and all generator engines are running on load.

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9. Conclusion

This report has described the operational character of DPO01 - Wesley Vale Data Centre, Tasmania - across its three principal noise-emitting plant groups: standby diesel generators, adiabatic dry coolers, and roof-mounted chillers. A staged Day 1 / Day 2 deployment has been addressed, with Day 1 comprising approximately 25 MW IT capacity and Day 2 augmenting this to approximately 50 MW IT capacity.

Two operational cases have been defined: a Worst Case corresponding to the ASHRAE 0.4% summer design day with all cooling plant at full fan speed and all installed generators on load, and a General Operational Case representative of the overwhelming majority of operating hours, including every overnight period.

The climate basis for DPO01 is the Devonport reference station (ASHRAE WMO 959600). The Devonport 0.4% cooling design dry-bulb of 23.4°C is materially mild, and the adiabatic changeover temperature is not reached under design conditions. Wet-mode operation of both the adiabatic coolers and chiller evaporative pre-cool pads will therefore be rare.

The standby generators are not a routine noise source. Under normal utility supply, generator noise is limited to scheduled off-load exercise tests conducted within daytime business hours (08:00–17:00). Genuine outage events are infrequent and unscheduled. Overnight residents and sensitive receivers are not expected to experience generator noise under normal operating conditions.

The adiabatic dry coolers operate continuously. Their VFD-modulated fan speed tracks ambient closely: overnight at Wesley Vale, with mean dry-bulb of approximately 14–16°C in summer and 8–12°C through the remainder of the year, fan speed falls to the 20–50% range, reducing unit sound power by approximately 10–20 dBA relative to the full-speed figure used in the compliance model.

The roof-mounted chillers operate continuously. Their condenser fans are speed-controlled against compressor demand, and low Wesley Vale temperatures reduce compressor load and fan speed significantly, such that in-service sound power during overnight hours is materially below the full-load figure used in the compliance model. The 5,500 mm perimeter noise wall planned around the rooftop chiller plant — extending a minimum of 1,000 mm above the condenser-fan discharge plane of every unit — will provide attenuation of both direct casing break-out and side-radiating fan noise that the acoustic compliance model does not formally credit.

Taken together, the acoustic worst-case model is significantly more onerous than the conditions that will prevail in practice. The model applies full-load sound power to all plant simultaneously and continuously — a combination that cannot occur during the acoustically critical overnight period, when ambient conditions drive both cooling plant groups to significantly reduced output and the generators are not running. The operational context in this report, in particular the day/night operating map in Appendix A and the Day 1/Day 2 inventory in Appendix B, should be the basis for demonstrating that DPO01 will achieve compliance with the applicable noise criteria at all sensitive receivers across all hours of the day.

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Appendix A - Day vs Night Operating Map (Day 2 inventory)

Plant	Worst-case day (compliance scenario)	General-case day	General-case night (22:00-07:00)
Generators	40 of 40 on load, full output (utility-loss; hot standby)	Off (utility supply); off-load test in daytime	Off
Adiabatic coolers	All 20 units on, 4 fans/unit at 100 % VFD	All on, fans at 30-70 %	All on, fans at 20-50 %
Roof chillers	All 20 units on, 6 EC condenser fans/unit at high speed	All on, fans at 30-70 %	All on, fans at 20-50 %

Appendix B - Day 1 vs Day 2 Plant Inventory Summary

Plant	Day 1 (IT 25 MW)	Day 2 (IT 50 MW)
Generators	20 installed	40 installed
Adiabatic coolers	15 installed	20 installed
Roof chillers	10 installed	20 installed

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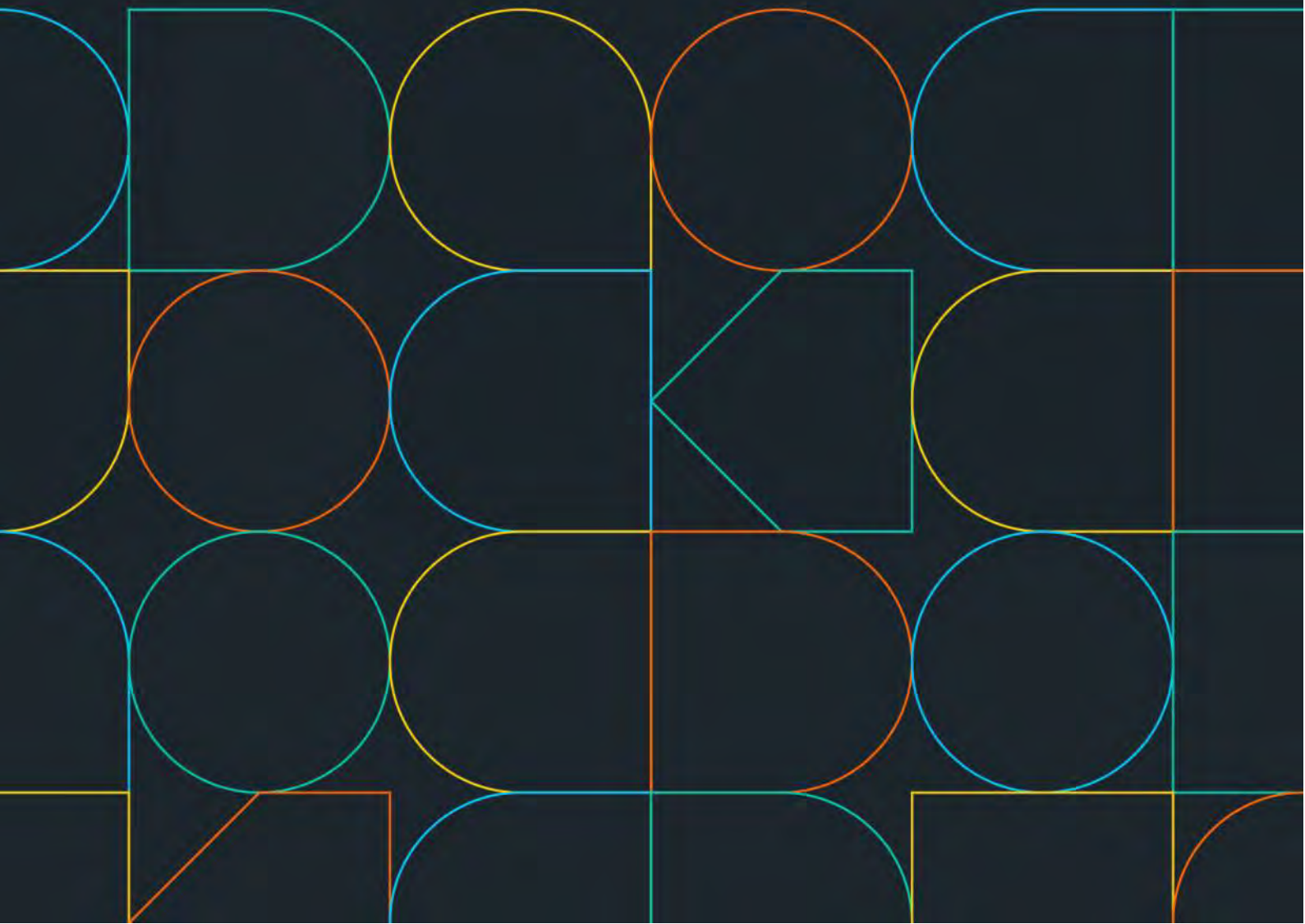
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Wesley Vale Data Centre
Noise Assessment

Pitt & Sherry (Operations) Pty Ltd
ABN 67 140 184 309

Phone 1300 748 874
info@pittsh.com.au
pittsh.com.au

Located nationally —
Melbourne
Sydney
Brisbane
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Launceston
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Appendix E

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ABN 67 140 184 309

Phone 1300 748 874
info@pittsh.com.au
pittsh.com.au

Located nationally —
Melbourne
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Memo

To Andrew Buckley

From Steve Edwards

Date 18 August 2026

RE **P.25.1474 Firmus Wesley Vale Wastewater Concepts**

1. Background

The Firmus development at Wesley Vale occupies a currently undeveloped lot adjacent to other industrial developments (Figure 1).



Figure 1: Site location overlain on geology map showing cadastral extents of ownership.

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The main part of the site has a gentle slope towards the north east varying from 1 in 20 to 1 in 40.

Water requirements to site have been described in the May 2026 memo “Firmus Wesley Vale Water Supply – Initial concepts / preliminary considerations.”

That memo discusses the outcomes of water modelling for cooling. Cooling is by far the largest usage on site and results in approximately 90% of the cooling flow evaporating leaving 10% of the flow to be handled by the wastewater system. Dependent on the assumptions used the current anticipated cooling use would be between 0 and 700kL per year. This would result in between 0 and 70kL of passthrough water flow from cooling activities.

Other assumed uses include a calculation for personnel of 50L/person/day consistent with AS1547 which equates to 0.9kL per day along with a standing allowance for fire of ~0.5ML in storage.

All water entering the site is (under the current concept) roof rainwater or trucked in potable water from a local supplier. There will be a storage of approximately 700kL for cooling purposes only. Filtration of the stored water will be required prior to use. There may be sterilisation of the cooling water which is likely to create some form of chlorine residual (to be decided at detailed design).

2. Wastewater Allowances

0.9kL/day (330kL per year) - The usage by personnel is for office related activities and relates ultimately to showers, toilets and kitchen usage. Thus planning for treatment and disposal is as for blackwater usage according to AS1547 criteria for remote sites. There is no allowance for food waste disposal (sink macerators) or full time residential occupancy on the site.

10kL/ year (est.) - Water for fire protection requires occasional cleaning / flushing of the fire systems. This will be potable quality water and flush volumes are assumed to be 10 kL per year based on an assumed 30kL/ha/year norm and the building area only. This assumption is made on a site area basis and will be informed later by the designers of the fire system (t.b.a. not p&s).

70kL/ year – passthrough water from cooling activities is also assumed to be potable quality, or near to that, with the variance being the concentration of salts normally present in the provided water.

3. Wastewater Treatment

3.1 Personnel

We propose a standard small facility treatment from a proprietary manufacturer of systems. This involves a multistage Aerated wastewater treatment system (AWTS) treatment device with typically the following phases - anaerobic (septic), facultative aerobic, aerobic, solids settling and separation / recycle, disinfection (sterilisation), filtration and surge storage. The treated water is then disposed of as below. Example is shown in Figure 2. Optionally a septic tank may still comply and could be used depending on client preferences. Both treatment types occupy around the same footprint and require similar depths of excavation.

For the AWTS option aeration is provided by blowers and therefore requires electrical connections. Controls systems and monitoring are typically on board the provided system. The effluent from an AWTS will typically use sterilisation, though it is not essential for trench disposal as will be used here. If provided it is likely to be through automated chlorine addition prior to disposal.

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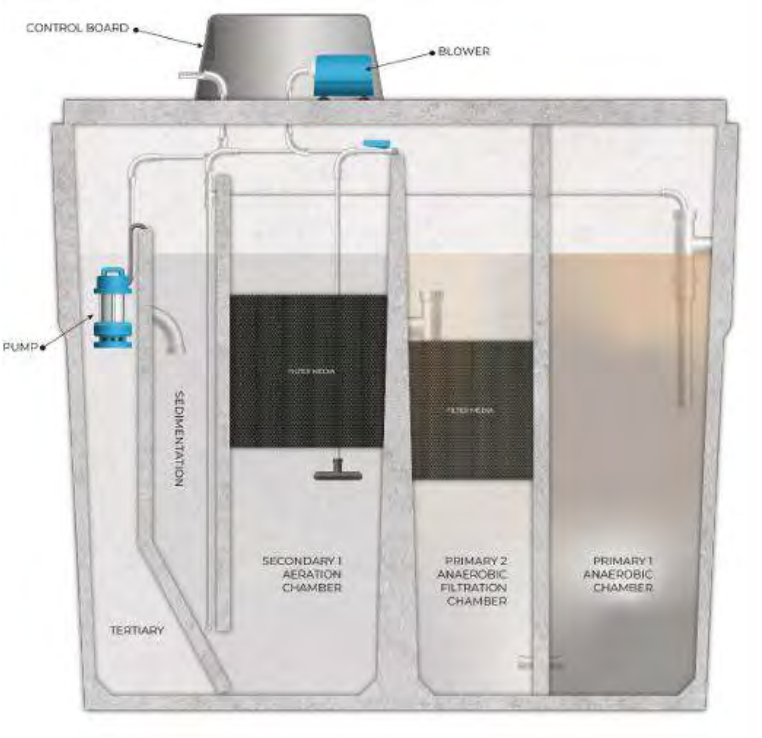


Figure 2: Treatment example AWTS. (typical but in this case from Envirotas)

3.2 Fire Protection and Cooling Passthrough

These are disposed of without treatment or surge storage. Both of these uses are extremely infrequent and still result in water of high quality. Yearly cooling use is anticipated to average 120kL (12kL of passthrough) and the maximum of 608kL (60kL of passthrough) occurred once over 26 years of temperature data.

Due to their high purity the volumes will be sent directly to the site stormwater system.

4. Treated Wastewater Disposal / Reuse

Treated wastewater disposal to a trench or bed system is a typical default and can avoid a need to sterilise the output water, as well as avoid a need for storage in winter months.

The soil is likely to be unsuitable for default trench disposal design, but is suited to a lined discharge control trench (or lined bed) design. Soil in the region of interest (BH05 or TP06 of the Geotech report) is at least 0-1m of highly pervious sandy soils above a slightly reduced permeability layer at 1.5m (BH05), while in TP06 the permeable soils continue for a much greater depth.

Use of a lined discharge area avoids horizontal migration and will guide the wastewater to the lower layers - providing sufficient soil exposure and an acceptable means of disposal.

Bed / trench disposal has been chosen for disposal and a loading calculation used to calculate needs. Using a conservative estimate of 15mm/day loading rate the requirements are a 60m2 trench or bed area supplied by low pressure effluent distribution lines. A site(s) has been selected in the grassed areas adjacent to the main development.

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The sites are well clear of the waterways. Under AS1547 any site must remain 100m away from any waterway, and while there is a local swale in the regions chosen this is not a registered waterway or even an ephemeral creek. The depression represented will be levelled in construction.

The footprint of the treatment plant would be adequately encompassed by the concepts in Figure 2. There are no existing shrubs or trees (the commercial forest area in Figure 1 has / will be harvested.

5. Summary Requirements

At this stage assumed requirements are for 0.9kL per day of office / personnel wastewater treated to full tertiary standard and disposal to a lined bed.

The position of the lined beds is suggested to be as in Figure 3. The figure provides for a reserve area in case of distribution bed failure (typically required under AS1547). Both beds are located sufficient far away from buildings and pavement.

Remnant cooling water and water from flushing and testing of fire systems will be sent directly to the on site stormwater system.

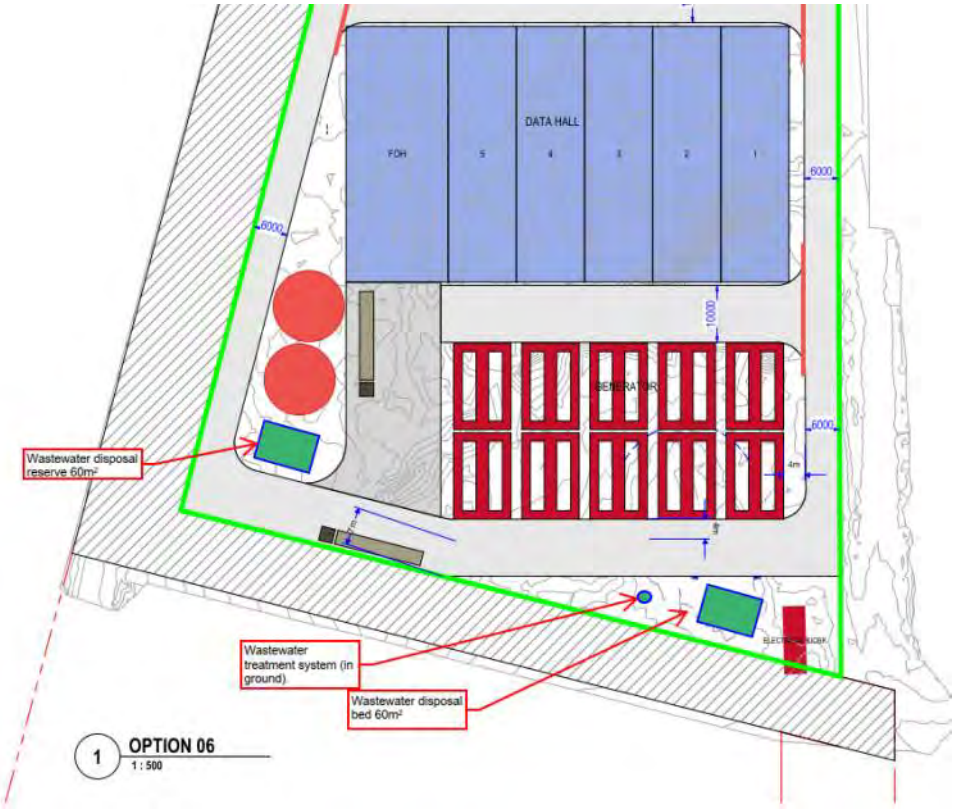


Figure 3: Main components and suggested locations.

Yours sincerely

Steve Edwards

Steve Edwards
Technical Director

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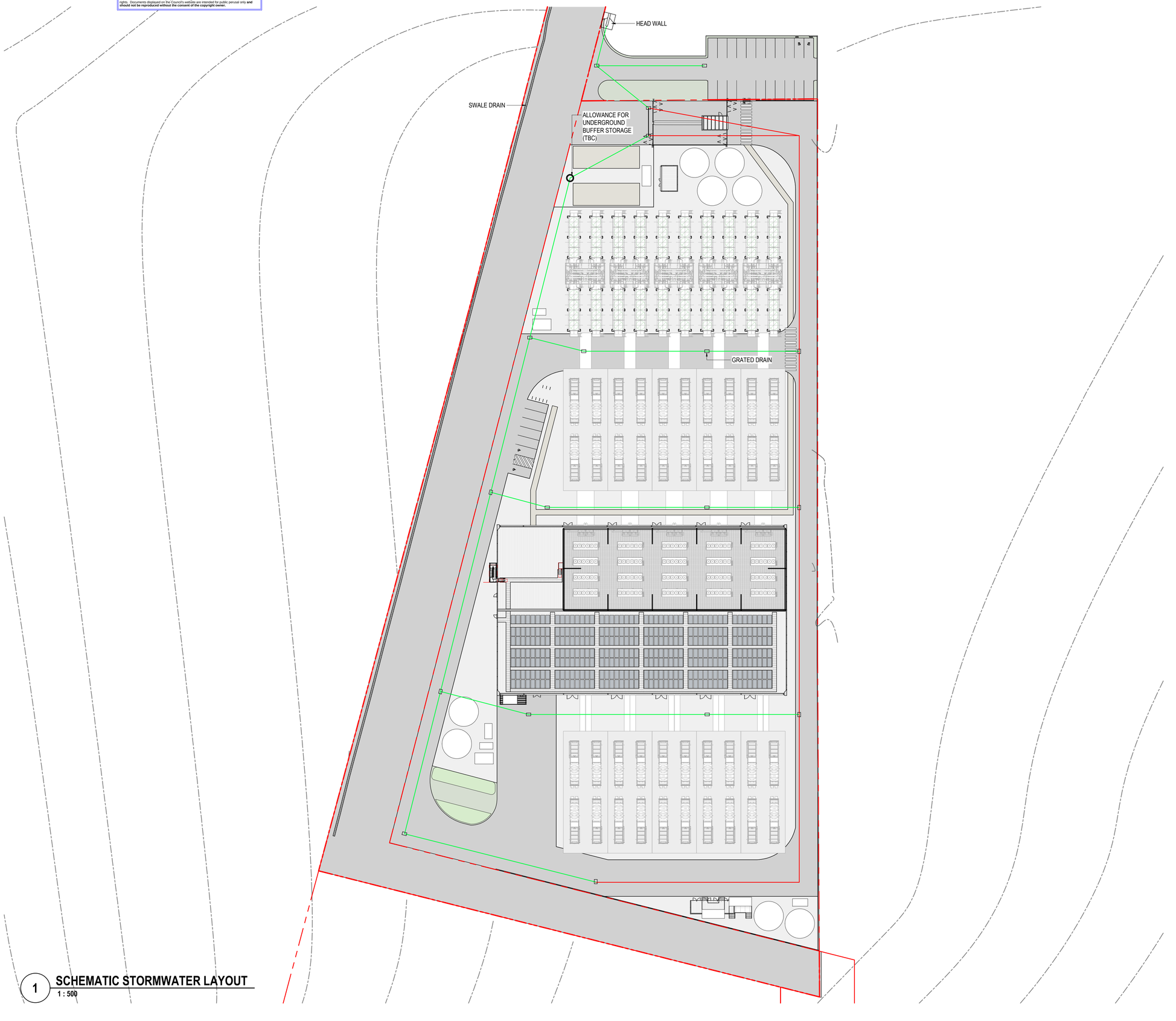
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1 : 500

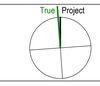
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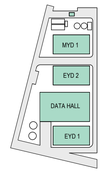
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KEY PLAN



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B	ISSUED FOR DA AMENDMENT	07/07/26	HDR	FIRMUS
C	ISSUED FOR DA AMENDMENT	20/08/26	HDR	FIRMUS

LEGEND
- SURFACE DRAIN (SD)
- STORMWATER PIPING (SW)
- GRATED DRAIN

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CLIENT

firmus

PROJECT
FIRMUS WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE
SCHEMATIC STORMWATER LAYOUT

SCALE 1 : 500 @ A1
PROJECT NUMBER 10463896
DRAWING NUMBER **12**
ISSUE **C**
PROJECT STATUS **ISSUED FOR INFORMATION**

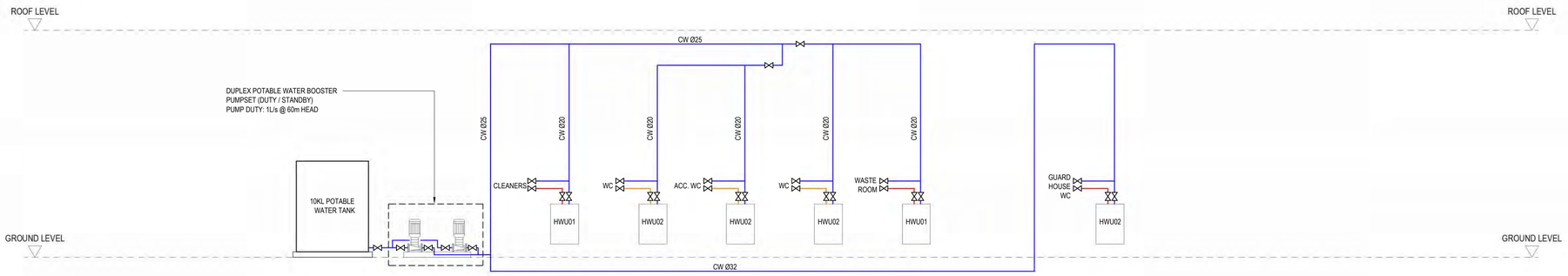
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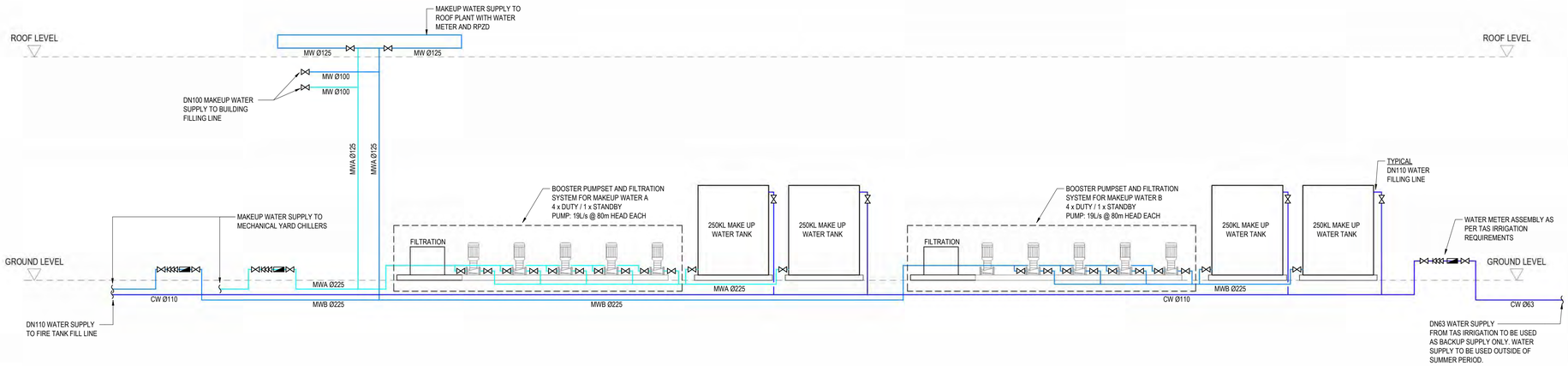
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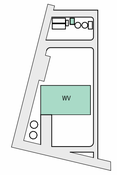
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PROJECT

FIRMUS WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE

HYDRAULIC SERVICES
WATER SERVICES SCHEMATIC

STATUS

PRELIMINARY

SCALE	DATE
N.T.S @ A1	17.07.2026

PROJECT NUMBER	DRAWING NUMBER	ISSUE
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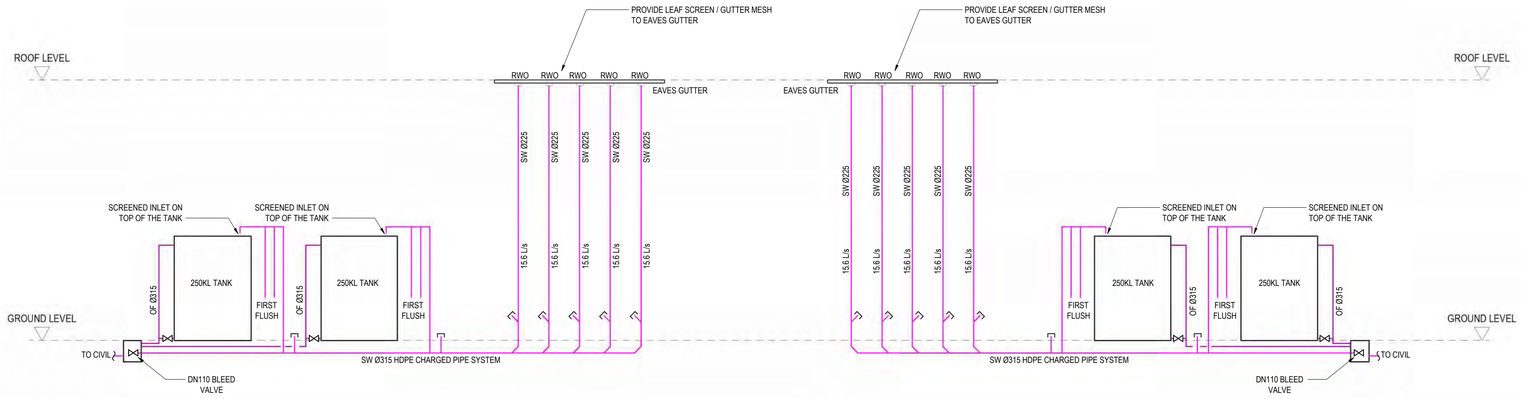
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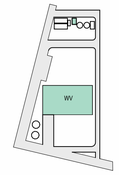
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PROJECT

FIRMUS WESLEY VALE
226 MILL RD, WESLEY VALE, TASMANIA

DRAWING TITLE

HYDRAULIC SERVICES
STORMWATER SCHEMATIC

STATUS

PRELIMINARY

SCALE	DATE
N.T.S @ A1	17.07.2026

PROJECT NUMBER	DRAWING NUMBER	ISSUE
10463896	DPO01-HDR-P6002-01	2

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Water Supply

Appendix F

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Memo

To Andy Courbould

From Steve Edwards

Date 18 August 2026

RE **Firmus Wesley Vale Water Supply**

---

1. Background

The Firmus development at Wesley Vale occupies a currently undeveloped lot adjacent to other industrial developments (Figure 1).

Figure 1 also shows the nearest water supply point which is situated outside the boundary of land ownership. Connection to this point is possible as are other connections (discussed below) however these will not be required.

pitt&sherry were asked to formulate initial plans for water supply and waste water disposal.

Site water usage is based on;

- Standard allowances for staff on site (50L/p/day) typical for AS1547
- Assumed relatively static volume for fire fighting water.
- The majority usage is for cooling obtained via a detailed model of water usage for cooling assuming provision of 20 Adiabatic units and 20 chillers with no indirect evaporative air coolers on the site.
    - The adiabatic units provide simple direct cooling for the banks of computers by taking the warm circulating coolant and passing it through finned heat exchangers outside the building. The heat exchangers use fans to push air ambient air across the exchangers. When the ambient temperatures are very high the cooling becomes ineffective and is then supplemented using water chilling – through evaporation of the water. These events occur infrequently but the provision of water for evaporation at those times is essential.
    - The air within the buildings is maintained using conventional air conditioning heat pumps (chillers) that operate over a broad range, but are still occasionally supplemented with evaporation of water.
    - In both cases the water is applied to evaporative pads across which the air flows. Approximately 90% of the water is evaporated. Second style of dot points are white dots with 6 points before and named Bullet Point Level 2. Capital letters at the start of each bullet and no full stops, commas or semi-colons are to be used at the end of dot points

Nominal allowances have been made for landscaping and fire protection. Fire protection usage can be high but is a single use plan, is not expected to require constant replenishment, and is being designed by others. Our assumption at this point is that the storage requirements for fire are 1000kL or less.

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The detailed cooling water usage model was developed for the initial concept development phase for Bell Bay and the underlying assumptions are detailed in T-P.25.1220-UTL-MEM-001-Rev00 and not repeated here. The model is based on hourly temperature records for 26 years from 2000-2026 from the Devonport Airport BOM station. In this case the actual BOM station is very close meaning no corrections are required for effects of topography.

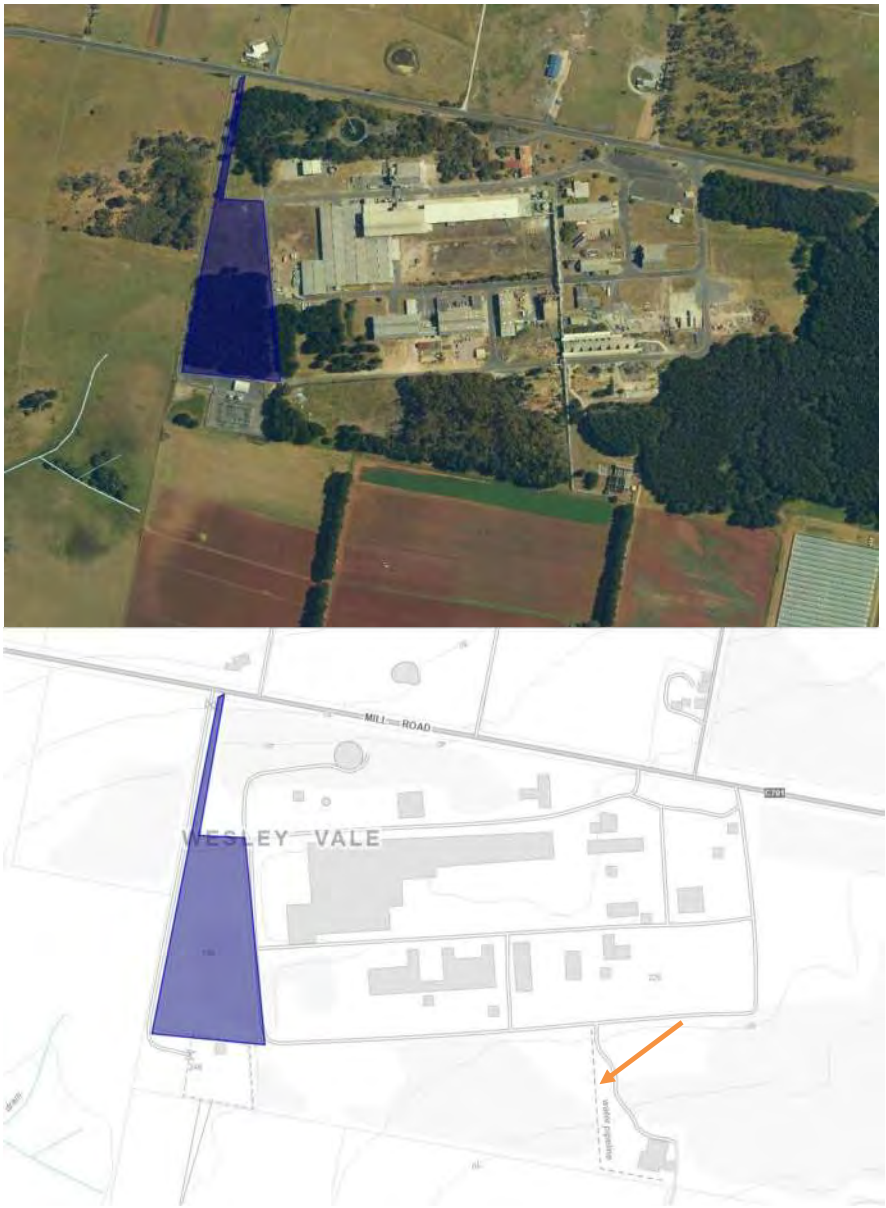


Figure 1: Site location (shaded area). One local connection point (not used) to water is shown arrowed.

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2. General description

Cooling: The highest water usage on site is for cooling water. Cooling water is used in adiabatic coolers and chillers at this site. Southgate design statements indicated the adiabatic coolers require water assistance when ambient air temperatures are above 27C, the chillers above 26C. Both forms of usage equate to an evaporative pad at the condensing side of the finned heat exchanger. Water is dripped through the pad and allowed to evaporate. This cools the air prior to the electrically driven chiller component increasing the system efficiency.

Not all of the water dripped onto the condenser pad evaporates. The limited information we have indicates the chiller systems use a non-recirculating application, but can modulate the flow. The adiabatic coolers use an on/off water application but recirculate the residual for a limited time. For both this means that water does not require the chemical treatment that would be required in a recirculating system (like older style cooling towers). The waste water from this form of assistance – that which drips through – is disposed of on site. The volume has been approximated for Southgate as 10% of the full volume usage (usage at maximal load) calculated over the designed / anticipated operating hours.

Data for the chillers allows a more finessed calculation of water use at varying ambient air temperatures using the table below and based on the dry bulb air temperatures only.

Table 1: Chiller water usage – extract from 500kWr model specification provided

Amb DB (°C)	Amb WB (°C)	Air Volume (m3/hr)	Water Consumption (l/min)
36.5	25.4	150257	11.24
33.6	23.5	148511	10.14
30.6	21.6	147622	9.01
27.7	19.6	141278	7.78
24.7	17.7	141912	6.78
21.8	15.8	150127	6.19
18.8	13.9	147157	4.97
15.9	11.9	148637	0
12.9	10	143881	0
10	8.1	139108	0

A similar output for the adiabatic chillers was provided in the Southgate data (the same model is being used) and shown in Table 2. As the water consumption figures are very similar across the temperature range a single figure of 1.8m3/hr (0.5L/s) has been applied at or above the trigger temperature.

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Table 2: Adiabatic water usage. Model ADCHD 2.275MW Sound reduced – blue highlighted cells indicate operation in recirculating mode. Table sections omitted for clarity

Ambient Air Conditions dry bulb [°C]	RH %	operating hours h	make-up water consumption [m³]	waste water quantity [m³]	Evaporation quantity [m³]	make-up water consumption per hour [m³
29.0	41	1.0	1.6	0.1	1.5	1.6
30.0	40	1.0	1.7	0.1	1.6	1.7
31.0	41	1.0	1.8	0.1	1.7	1.8
32.0	43	1.0	1.7	0.1	1.6	1.7

2.1 Cooling events

Modelling of temperature events was conducted against three trigger temperatures – 24C is relevant only to other sites. 26 and 27 degrees are the trigger temperatures for the two forms of mechanical cooling on site.

The number of hours in a window and the number of sequential hours above the trigger temperatures are shown in Table 3 along with exceedances for two higher temperatures (to confirm patterns of behaviour but otherwise of no particular relevance to the outcome.

Table 3: Hourly temperature exceedances calculated for Firmus Wesley Vale site using hourly temperature records.

Tt -0.85 (Firmus)					
Hourly Temp Above	24	26	27	30	33
Hours in a Row	Incidents in 25.8 Years				
1	259	56	31	2	1
2	138	29	16	2	0
4	54	12	6	0	0
8	9	2	0	0	0
12	1	0	0	0	0
18	0	0	0	0	0

Max Temp Above	24	26	27	30	33
Window (Days)	Max Hours in Window > Temp (Not Consecutive)				
2	20	12	6	3	0
4	24	14	6	3	0
6	24	14	6	3	0
8	25	14	6	3	0
10	29	15	7	3	0
12	29	15	7	3	0

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3. Volumes and flows

3.1 Personnel and fire

Assumed uses include a calculation for personnel of 50L/p/day consistent with AS1547 which equates to 0.9kL per day along with a standing allowance for fire of 1ML in storage.

3.2 Cooling

A detailed model of cooling water usage was created based on the number of units of each chiller type, the stated water usage and the trigger temperatures. The relevant chiller types were adiabatic (20 JAEGGI units) and chillers (20 Smardt units).

The trigger temperature of 26C originally specified for the larger Southgate units was used for the Smardt 500kWr EB060 units in the following outcomes. Trigger temperature for the JAEGGI ADC-HD-E-4-2-2P 2300kWr adiabatic units was 27C, we have applied a start at 27C with full usage of 0.5L/s for all temperatures above 27.5C for the following calculations (except where varied in the sensitivity analysis).

The model computes usage every hour for the duration of the temperature records (2000 to 2026) using Devonport Airport hourly temperatures.

3.3 Cooling model results

Cooling needs across the full data period are shown in Figure 2. The cooling water usage is dominated by the adiabatic units.

Maximum (calendar) monthly cooling water usage in this time period is modelled to be ~ 340kL with next worst usages at around 280kL. Given there are constraints on supply (next section) then usages over long time periods are relevant to our calculations.

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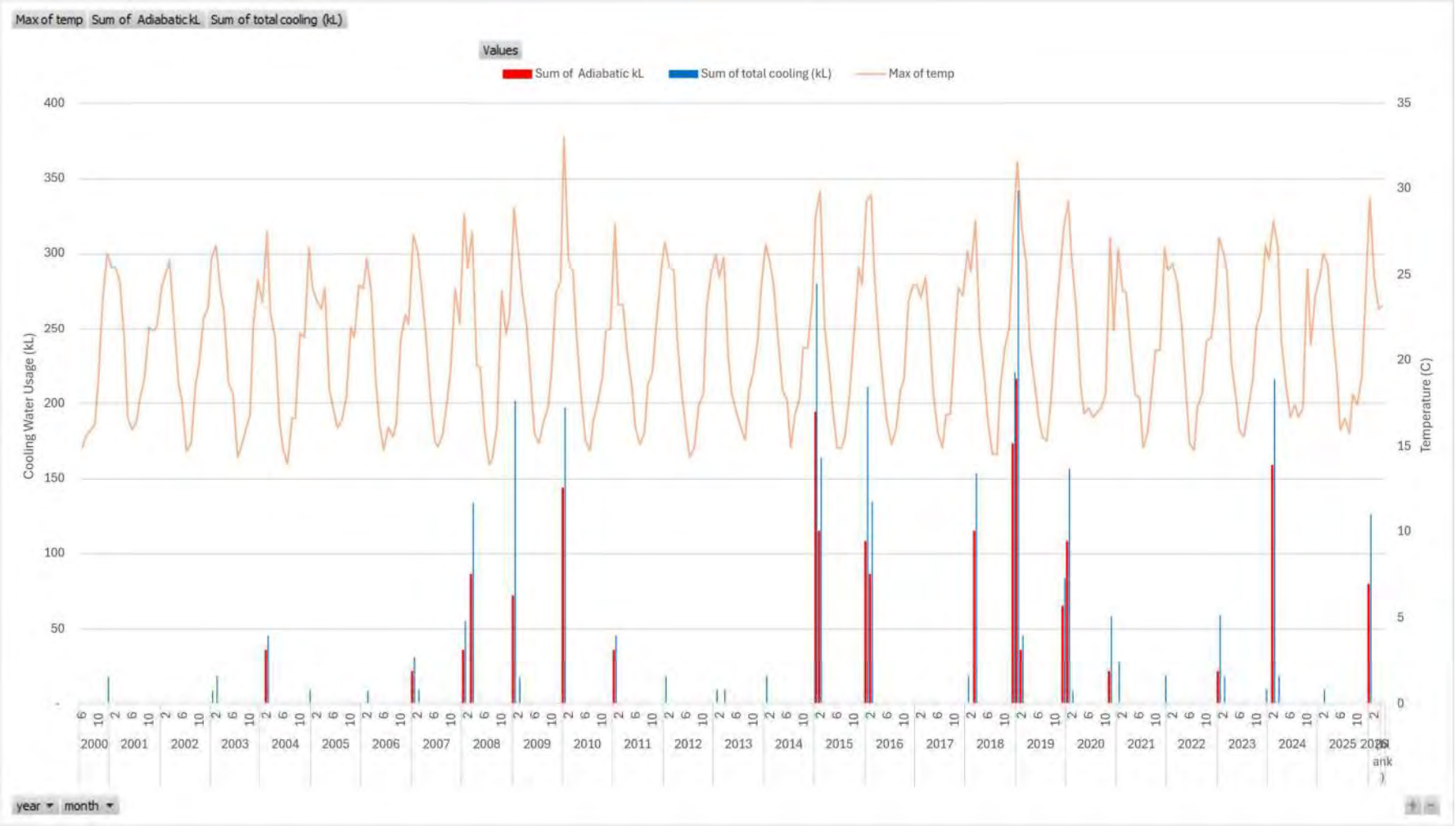


Figure 2: Monthly cooling water usage modelled for Firmus Wesley Vale and maximum monthly (modelled) temperatures from 2000 to 2026

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The dominant events - for number of days in a row – are modelled for peak days. In 2019 this occurs over 8 days and represents a daily usage peak of 230kL. The hourly usage pattern is shown in Figure 3.

The usage across these four days totals ~ 340kL.

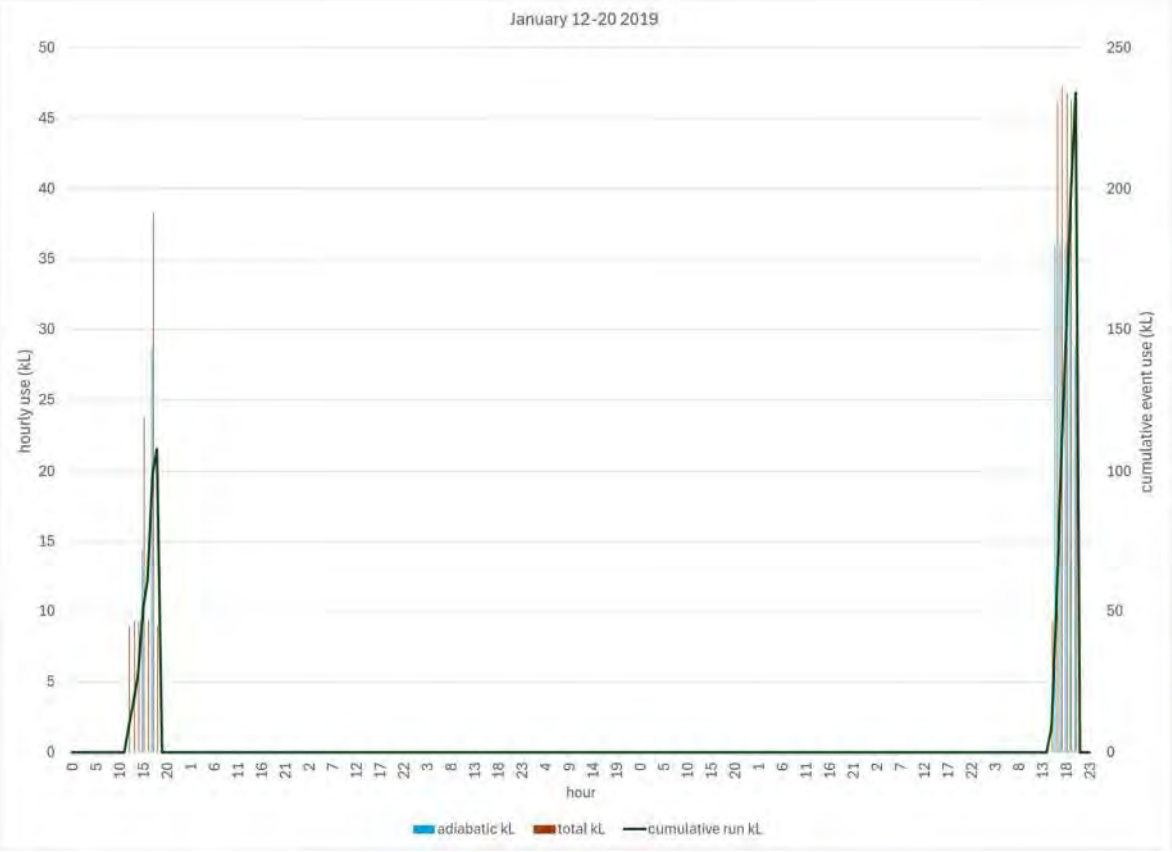


Figure 3: Modelled usage event in 2019. Usage across 8 days

Due to the restrictions on supply at the site we have determined that a monthly or quarterly rolling supply analysis might provide the best visualisation of the coverage of risk.

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Figure 4 shows the frequency on any day of the needs for the next month. At 0.1% of the sample period (26 yrs) this basically says there were 10 days when you woke in the morning that you needed to have that volume in the tank to get you through the next month. The event in this figure at around 450kL was in January 2019 as per Figure 3.

The total summer usage for each year is shown in Table 4.

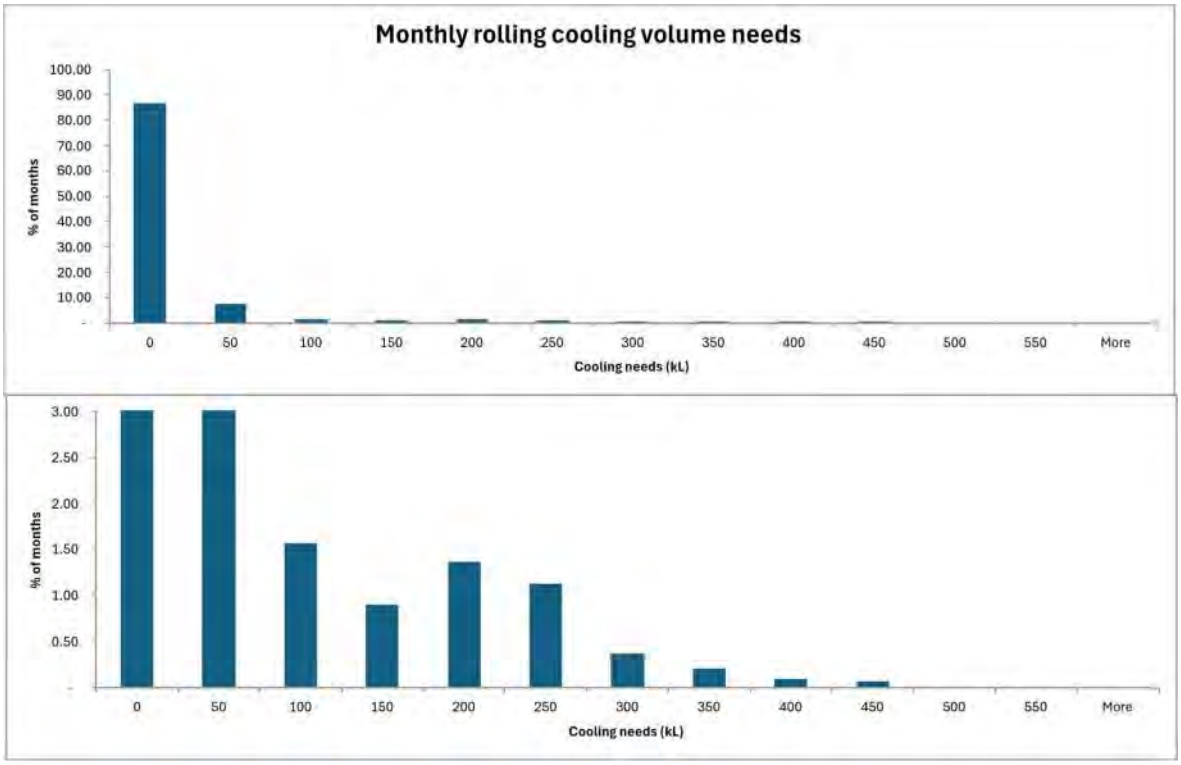


Figure 4: Monthly rolling cooling needs analysis. Lower panel is a truncated version of the upper panel. X-axis values describe the top of each bar range

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3.4 Conclusion on volume requirements

Noting the risk profile given (that the cost of extra infrastructure to supply the cooling volume is far exceeded by the cost of a day's contract outage) the cooling volume requirement is taken to be 700kL available over a short period (days).

Table 4: Summer usage quantities for cooling water modelled over the hourly time data available. Each year refers to Nov/Dec of the noted year plus Jan/Feb/Mar/April of the next year

Year	Summer Total (kL)
2000	0
2001	18
2002	0
2003	27
2004	46
2005	9
2006	9
2007	40
2008	189
2009	220
2010	198
2011	46
2012	18
2013	18
2014	18
2015	444
2016	345
2017	0
2018	172
2019	608
2020	249
2021	86
2022	18
2023	77
2024	243
2025	9
2026	126

Average usage is 120kL per summer period.

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4. Supply

The rapid, short term intermittent high level supply need seen above means that a significant storage is needed on site.

Hence water will be provided from rainwater and topped up if needed by a trucked in supply of local potable water. We expect the trucking option to be needed only in extreme dry periods.

4.1 Rainwater management and use for cooling

There is a sustainable supply of rainwater on site if storage is provided and managed.

Site rainfall is expected to be 760mm/year with effective rainfall (that excluding short or light showers) at 535mm/year.

The system requires an “at ready” storage of 700kl of sterilized water. Water must be sterilized for health reasons as the water is sprayed onto the inlets of the various cooling devices creating potentials for aerosol borne infections. The two roof collection tanks would be kept at full levels.

When drawdown occurs the 700kl is shown by the modelling to be sufficient for 8 days demand in the highest historical year. We propose that the system is set up with backup so that it can alternatively use trucked in water supply deliveries as the alternative source.

4.2 Staff

Potable water pipelines on site will be differentiated and outlets marked as per Australian standards. This water will be for potable uses only.

Rainwater / trucked supply water tanks will supply the non-potable component of staff use. The water will be filtered and used for non-potable staff needs for sinks, washing and toilets (without sterilisation).

Potable water for staff water will be delivered in 5kL IBCs and / or via a local potable (tank) water supplier to an on-site 5kL tank.

The small volume of 5kL has been chosen to ensure residual disinfection for the duration of use and this volume may be altered at detailed design. Detailed designers may prefer to manage a larger volume and sterilise the supply.

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4.3 Total rainwater storage volume.

The total rainwater collection tanks will be 1000kL comprising 700 kL for cooling reserve and 300kL for non-potable staff usage.

Table 5: Rainfall collection. Effective rainfall is used only for pervious surfaces and ponds. Runoff coefficient is used for hardstand and buildings

Rainfall on site				
rainfall average	763	mm/year	94	max mm/month
effective rainfall average	534	mm/year	45	av mm/month
evaporation average	2.90	mm/day		
evaporation average	1,044	mm/year		
rainfall - 10%ile	563	mm/year	22	av mm/month
rainfall - 90%ile	975	mm/year	111	av mm/month
effective rainfall - 10%ile	177	mm/year	15	av mm/month
effective rainfall - 90%ile	932	mm/year	78	av mm/month
Areas				
site prep area	2.00		Ha	
developed hardstand & roads	0.25			
developed hardstand & roads	0.50		Ha	
building number		1	piece	
width		46	m	
length		78	m	
buildings collection area	0.36		Ha	remainder assumed pervious
pond 1 area	0.00		Ha	
pond 2 area	0.00		Ha	
runoff coeff for impervious surfaces	0.95			
total rainwater collection area	0.86		Ha	
volume collected in kL/year	**average year**	**10%ile rainfall**	**90%ile rainfall**	
total incl ponds	6,362	4,594	7,953	
developed hardstand	3,624	2,675	4,630	use runoff coeff
ponds	0	0	0	ponds use effective rainfall calc
roof only (kL/yr)	2,738	1,919	3,323	use runoff coeff, not effective rainfall, as short fall impervious surface
monthly roof collection (kL)	152	50	265	

Early collections would be encouraged - the water tanks could be used for collections during construction as soon as the roof of the building is installed.

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As can be seen from the above table the average monthly collection in an average year is around 150kL. This would not be sufficient to quickly refill the storage tanks in the event of, say, the modelled 2019 usage of ~600kL. However this 600kL usage is modelled for the whole of the cooling event season – the 5 months from June are expected to be fill months only. Nonetheless in case of an event that causes concern site operators could choose either to wait (based on weather forecasting for instance) or to top up the tanks using trucked water.

As an example of a year in which trucked water might definitely be used - average monthly collections for 10%ile rainfall months may be as little as 50kL which is unlikely to be rapid enough to satisfy risk appetite if the tanks have already been emptied and the warm season is not yet over.

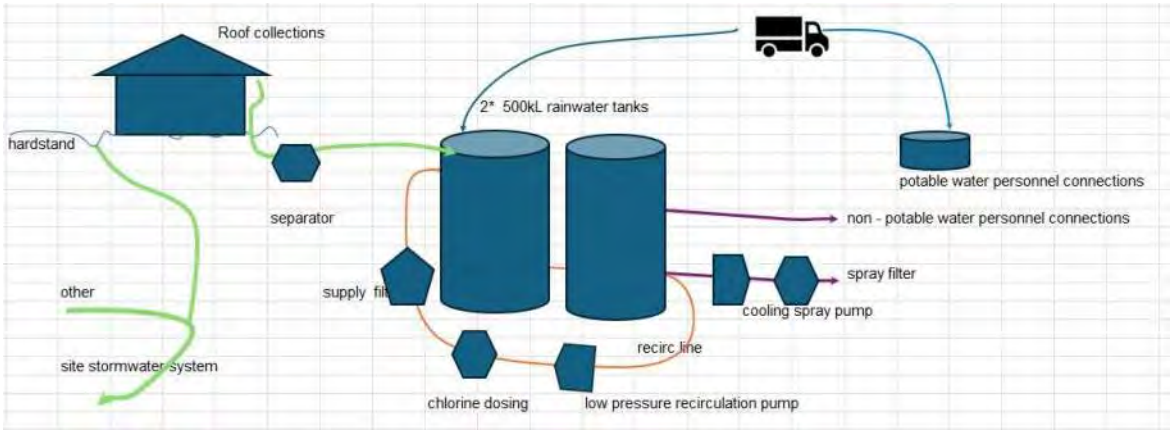


Figure 5: Separate cooling and potable water connection with on site storage

5. Summary

The outcome is for:

- 2 x 500kL rainwater tanks supplied from rooves (minimum – see below)
- 1 x 5kL (minimum) potable water tank (drinking only)
- Appropriate piping, pumping and sterilisation infrastructure is provided to match the needs.

The use of on site rainwater matches well as a significant part of anticipated usage. It is expected that supply will be adequate even in 10%ile rainfall year.

- This is not a set and forget solution. Monitoring and active management of storage volume will need to be a part of weekly if not daily management actions. The client may choose a greater storage volume to reduce this need.
- Non-potable personnel connection must be physically set at a height or in a manner that it cannot reduce the cooling storage volume below 700kL
- Trucked supply infrastructure (access, parking space, connection points) will be incorporated in the design to ensure supply is available to cooling water tanks if required in unusually hot and dry years.
- Proactive filling of the storage may be required depending on weather forecasting.
- Detailed design will need to consider and provide any mandated requirements for sterilisation.

Bushfire Hazard Management Plan

Appendix G

pitt&sherry

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northbarker
ECOSYSTEM SERVICES

Proposed AI Data Centre

226 Mill Road Wesley Vale

Bushfire Report and Hazard Management Plan

18/08/2026

For Pitt and Sherry (obo Firmus Technologies Pty Ltd)

PAS172



313 Macquarie Street, Hobart Tasmania, 7000
03 62319788
admin@northbarker.com.au www.northbarker.com.au

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SUMMARY

Survey and report details	
Surveyed by	Cameron Geeves
Survey date	27th May 2026
Photos	Cameron Geeves
Report prepared by	Cameron Geeves (BSc Hons) (BFP – 178 scope of accreditation 1, 2, 3A, 3B and 3C)
Hazard management plan and emergency management strategy prepared by	Cameron Geeves
Design	Concept design received from Pitt and Sherry – 26/05/2026
NBES project manager	Cameron Geeves
Mapping	Rabin Kahtri (BSc, MEnvGeospatial)
File control	v0.1 draft to Pitt and Sherry 11/06/2026
	V0.2 draft to Tasmania Fire Service 09/07/2026
	V1.0 delivered to Pitt and Sherry 14/07/2026
	V1.1 minor updates from Pitt and Sherry comments 18/08/2026

Site details	
Address and PID	226 MILL RD WESLEY VALE TAS 7307, PID 6524040
Planning scheme	Tasmanian Planning Scheme – Latrobe
Planning scheme – zoning	General Industrial (Zone 19)
Planning scheme – code overlays	Bushfire Prone Areas (entire site)
BCA class of building	Data centre buildings – Class 7B Guardhouse – Class 5 UPS generators – Class 8
Determined Bushfire Attack Level for the site	BAL 12.5



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1 INTRODUCTION

The following proposal is for the development of an AI data centre at 226 Mill Road, Wesley Vale (Figure 1).

The proposed site is situated on land within the municipality of Latrobe. The *Tasmanian Planning Scheme – Latrobe* (2020)[1] identifies the land as being within the Bushfire Prone Areas overlay. The proponent, Pitt and Sherry (obo Firmus Technologies Pty. Ltd. [herein Firmus]) have engaged North Barker Ecosystem Services to complete a Bush Fire Hazard Management Plan (BHMP) as required by Latrobe Council.

This report has been prepared by Cameron Geeves BFP – 178, Scope of accreditation – 1, 2, 3A, 3B and 3C and demonstrates compliance with the Tasmanian Planning Scheme – Bushfire-Prone Areas Code (the Code) and *Directors Determination – Bushfire Hazard Areas* v1.2 (the Determination) under the *Building Act 2016*.

It must comply with the required setbacks for the Bushfire Attack Level (BAL) for the proposal and other mitigation in compliance with the AS3959:2018 Construction of Buildings in Bushfire Prone Areas[2]. Given the proposed design includes the storage of a manifest quantity of fuel for backup power generation – it must meet the requirements of P1, A2 and A3 of C13.5.2 Hazardous uses under the Code[3].

2 SITE DESCRIPTION

The proposed development footprint is located within a privately owned freehold title (PID: 6524040) with a total area of approximately 2.8 hectares. The property is situated on the western side of 'Mill Park' industrial estate, approximately 12.5 km east of Devonport.

The site is located on the western edge of the Mill Park precinct within a gently undulating rural-industrial landscape. The development footprint sits at approximately 40–50 m above sea level and is predominantly gently sloping. The broader landform generally falls from south to north, with a more defined break in slope immediately beyond the northern part of the site where land descends toward Mill Road. To the east, the adjoining industrial estate occupies a modified and mostly levelled landform, while the agricultural land surrounding the precinct is gently undulating.

Under the Tasmanian Planning Scheme, the site is zoned General Industrial, consistent with the surrounding land in Mill Park. Beyond the industrial precinct, surrounding land is predominantly zoned Agriculture and is largely used for grazing and cropping. The site backs onto the Wesley Vale Transend substation, which is zoned Utilities.

Vegetation across a significant portion of the site has previously been cleared and replaced with pine plantation, which also extends more broadly through the southern part of Mill Park and into a larger plantation area to the east of the site (Figure 2). The surrounding agricultural land is largely cleared pasture or cropping land, with scattered shelterbelts and patches of planted or retained woody vegetation.

[1] Tasmanian State Government (2025)

[2] Australian Standard (2018)

[3] Tasmanian State Government (2025)

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Based on 3 pm summer observations from the nearest weather station at Devonport Airport[4], the predominant wind directions during summer fire weather are generally from the north, north-east and north-west, with the strongest and most relevant fire-weather winds generally associated with the northern and north-western aspects.

The site and surrounds were inspected on the 27th of May 2026.

2.1 LIMITATIONS

This report is based on site measurements recorded at the time of inspection and information provided by the proponent. The report is limited in scope to bushfire hazard assessment only. The assessment is specific to the current development proposal, and the findings apply to this site only. Future changes to the development proposal, or changes in vegetation condition or extent that may affect bushfire hazard, have not been considered.

The bushfire protection measures outlined in the BHMP in Appendix 1 have been assessed using a Fire Danger Index of 80 (FDI 80). This exceeds the minimum compliance requirements of AS 3959:2018 and has been adopted following advice from the Tasmania Fire Service for a similar development and has been adopted for this proposal to provide the same additional level of redundancy for the development.

While the minimum design scenario typically applied under AS 3959:2018 in Tasmania is FDI 50, this assessment adopts FDI 80 as a more conservative basis for assessing bushfire exposure and required protection measures. This approach is considered appropriate given the scale of the project, the level of investment, the presence of a 24/7 workforce, and the proposed storage of hazardous goods.

Under the Australian Fire Danger Rating System, Fire Danger Ratings are now derived using the Fire Behaviour Index, which does not directly align with FDI values and incorporates a broader range of fire behaviour models and fuel types. As a general guide, conditions equivalent to or exceeding FDI 50 are likely to occur somewhere within the Extreme Fire Danger Rating range.

Due to the unpredictable nature of bushfire behaviour and the potential impacts of extreme weather, no structure built in a bushfire-prone area can be guaranteed to survive a bushfire. Defending the property or sheltering within a structure constructed to AS 3959:2018 is not recommended under conditions that exceed the design assumptions of the BHMP. The safest option in the event of a bushfire is to leave the area early and seek shelter in a safe location.

[4] Bureau of Meteorology (2026) – NB wind rose data represents one point in time only and is not directly linked to FFDI.

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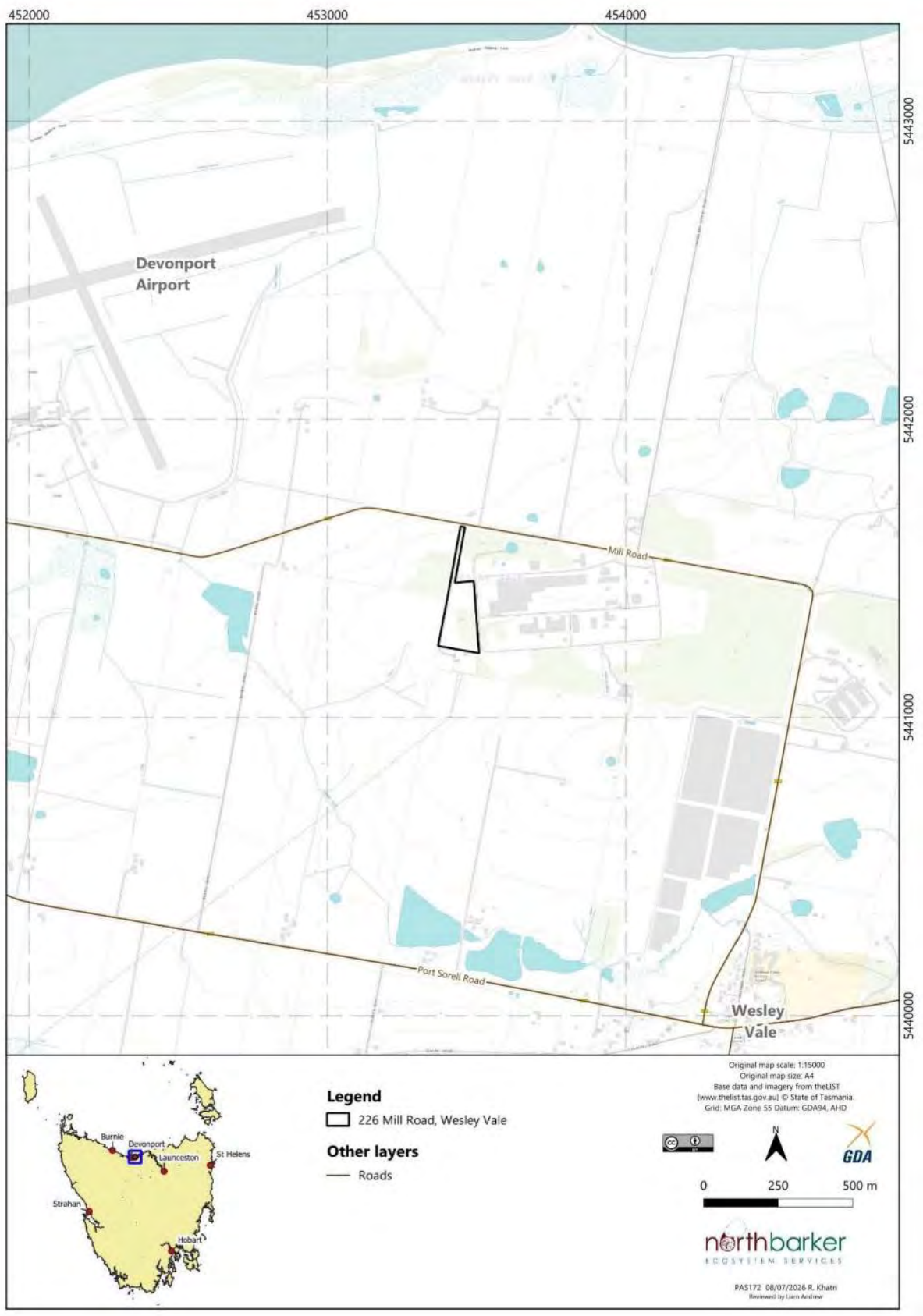


Figure 1. The location and context of the site.

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3 PROPOSED DEVELOPMENT

3.1 PROPOSED USE

The proposed development is a utility-scale AI and data processing facility that will operate as critical digital infrastructure within the established Mill Park industrial precinct. The use provides large-scale data processing, storage and transmission services and is characterised by continuous operation, secure access and high operational reliability.

The proposed use is consistent with the established industrial character of Mill Park, which accommodates large-format industrial, utility and infrastructure uses within a broader rural/agricultural setting. The use aligns with the intent of the General Industrial Zone by locating infrastructure-based development within an existing industrial precinct that is separated from sensitive land uses and serviced by existing road and utility infrastructure.

3.2 OPERATIONS

The facility will operate on a continuous 24-hour, 7-day basis. Operational activities will be largely internalised and will include the monitoring and management of data processing operations, routine inspection and maintenance of plant and infrastructure, security and access control, and associated administrative and operational support functions.

Staffing will be distributed across multiple shifts. During normal operations, approximately 10 staff are expected onsite during the daytime shift (8 am to 5 pm), with around 4 staff present during each of the two evening and night shifts (4 pm to 8 am).

The proposed operational profile is low-impact in terms of off-site amenity, with activities occurring within buildings and within an industrial environment characterised by existing utilities. No retail, visitor-oriented or community-facing activities are proposed.

3.3 BUILT FORM & SITE LAYOUT

The proposed development comprises one purpose-built data hall building, a guard house, maintenance facilities, internal access roads, parking areas and associated hardstand areas (Figures 3 and 4). With the exception of an area directly north of the lot that is subject to a lease agreement for parking, all built form and operational infrastructure is located wholly within the privately owned title.

Internal access, which encircles the data hall and generator buildings has been designed to accommodate operational, maintenance, service and emergency vehicles. The layout also incorporates perimeter security fencing around the facility. Table 1 below illustrates the NCC building classification[5] for each building within the facility:

Table 1. NCC building classification for each building within the facility.

Buildings within the facility	National Construction Code (NCC) building classification
Guardhouse	Class 5
UPS diesel generators	Class 8
Data centre building	Class 7b

[5] Australian Building Codes Board (2025)

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3.4 DANGEROUS GOODS ASSOCIATED WITH THE PROPOSAL

The following dangerous goods will be associated with each of the 40 backup UPS diesel generators:

- Diesel – 10,000 L per generator.
- Engine Oil – 400 L per generator
- LiFePO4 batteries – 90 per generator stack, approx. 6,345kg per generator stack. TBC

The location of the UPS diesel generators is illustrated in the BHMP that can be found in Appendix 1.

3.5 FIREFIGHTING ACCESS AND WATER SUPPLY

Access to the site is via Mill Road and then a sealed, 3.5 m wide private access road. The facility will be designed with integrated fire protection measures, including hydrant and sprinkler systems, dedicated firefighting water supplies, booster assemblies and emergency access provisions (minimum 6 m wide internal access) suitable for industrial-scale infrastructure.

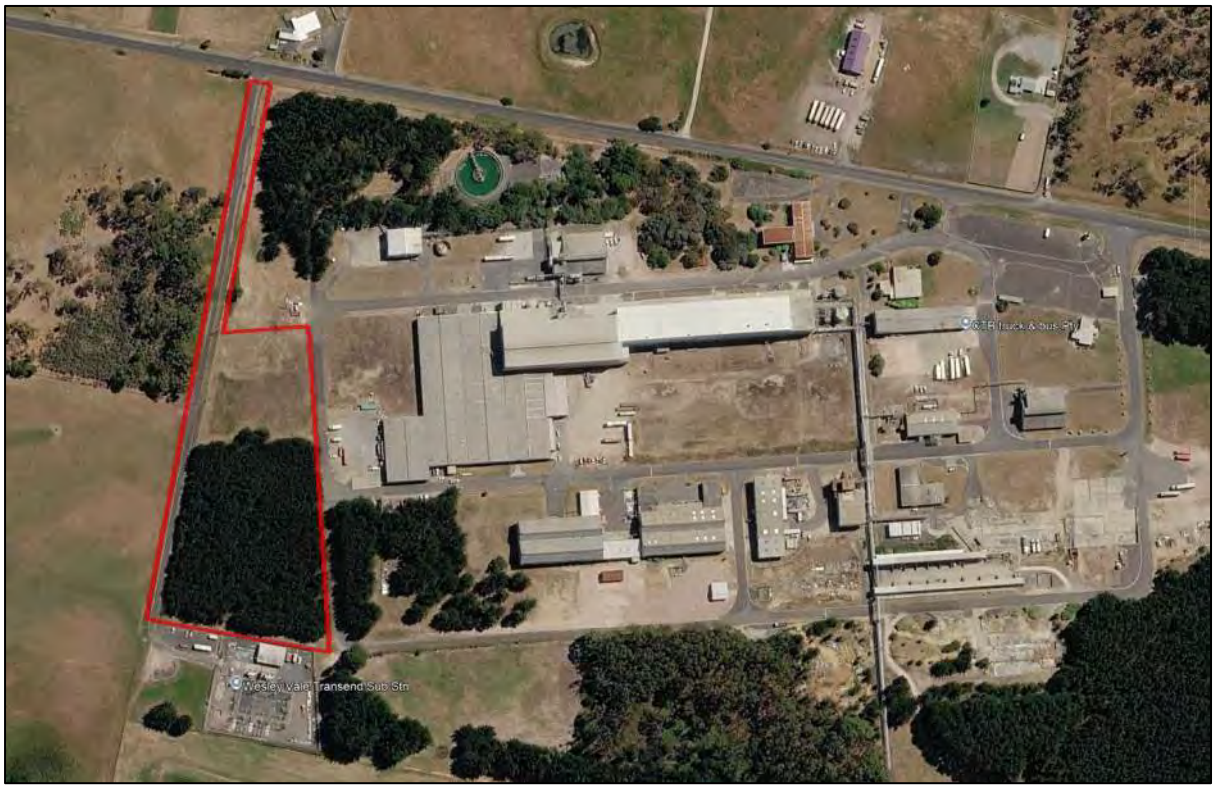


Figure 2. Google Earth image of the site (cadastre in red) (image date 01/06/2026).

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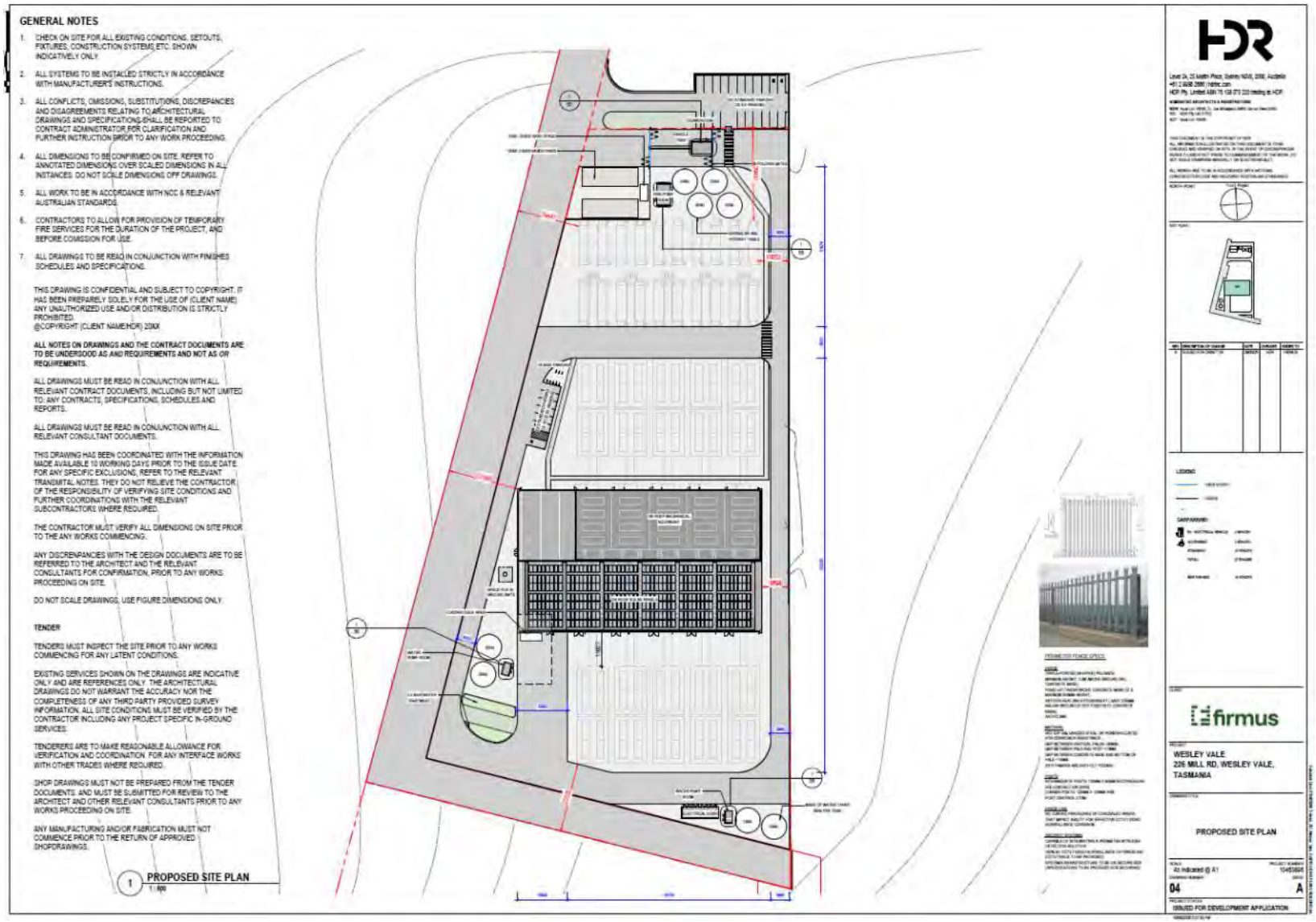


Figure 3. Proposed AI data factory site plan.

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4 BUSHFIRE HAZARD ASSESSMENT

4.1 VEGETATION AND EFFECTIVE SLOPE

4.1.1 Bushfire-prone vegetation

Vegetation within 140 m of the development footprint has been classified in accordance with Table 2.3 of AS 3959: 2018 in the site analysis plan (Figure 5).

Areas of pine plantation within the site and adjoining parts of the Mill Park precinct have been classified as Forest. This includes pine plantation within the proposed development site and more extensive plantation areas to the north, south and east of the development footprint.

Agricultural land to the south and east of the development footprint has been classified as Grassland, as have smaller grassy areas within the Mill Park precinct. These areas include cleared paddocks, pasture, cropping land and other grass-dominated areas.

A small remnant patch of *Eucalyptus viminalis* woodland occurs directly north-west of the lot, on adjacent agricultural land (PID: 9334869). This patch is not mapped on LISTmap as a distinct TASVEG 5.0 community and has not been formally surveyed for natural values as part of this assessment. However, based on its canopy composition and structure, it may meet the description of the Tasmanian threatened native vegetation community *Eucalyptus viminalis* coastal forest and woodland (TASVEG 5.0 DVC). For the purposes of this assessment this vegetation has been classified as Forest.

All surrounding built areas, roads, hardstand and utility infrastructure have been classified as low threat vegetation as per Table 2.2.3.2 (e) of AS 3959: 2018.

4.1.2 Topography and slope

Land within 140 m of the development footprint is generally low-relief and gently undulating. The development footprint is situated at approximately 40–50 m above sea level and is predominantly mapped within the 0–5° slope class, sloping from south to north.

More broadly, within 140 m of the development footprint the land generally falls from south to north, with a more defined break in slope beyond the northern part of the footprint where land slopes at 5-10° down toward Mill Road. To the east, land within the Mill Park precinct has been modified and partly levelled for industrial use and is effectively flat. To the south and west, land within 140 m comprises undulating agricultural land and plantation areas that are upslope or very gently (0-5°) sloping respectively. The effective slope under classified vegetation within 140 m of the development footprint is illustrated on the site analysis plan (Figure 5).

4.2 HAZARDOUS GOODS

The following hazardous goods will be associated with the backup UPS diesel generators and associated infrastructure:

- Diesel – up to 10,000 L per generator.
- Engine oil – approximately 400 L per generator.
- LiFePO4 batteries – approximately 90 batteries per generator stack, approximately 6,345 kg per generator stack. TBC.

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The backup UPS generators provide an alternative source of power if grid power is unavailable. The location of the UPS diesel generators is illustrated in the BHMP at Appendix 1. Each UPS generator will be containerised. Figure 5 provides an example schematic of the UPS generator design.

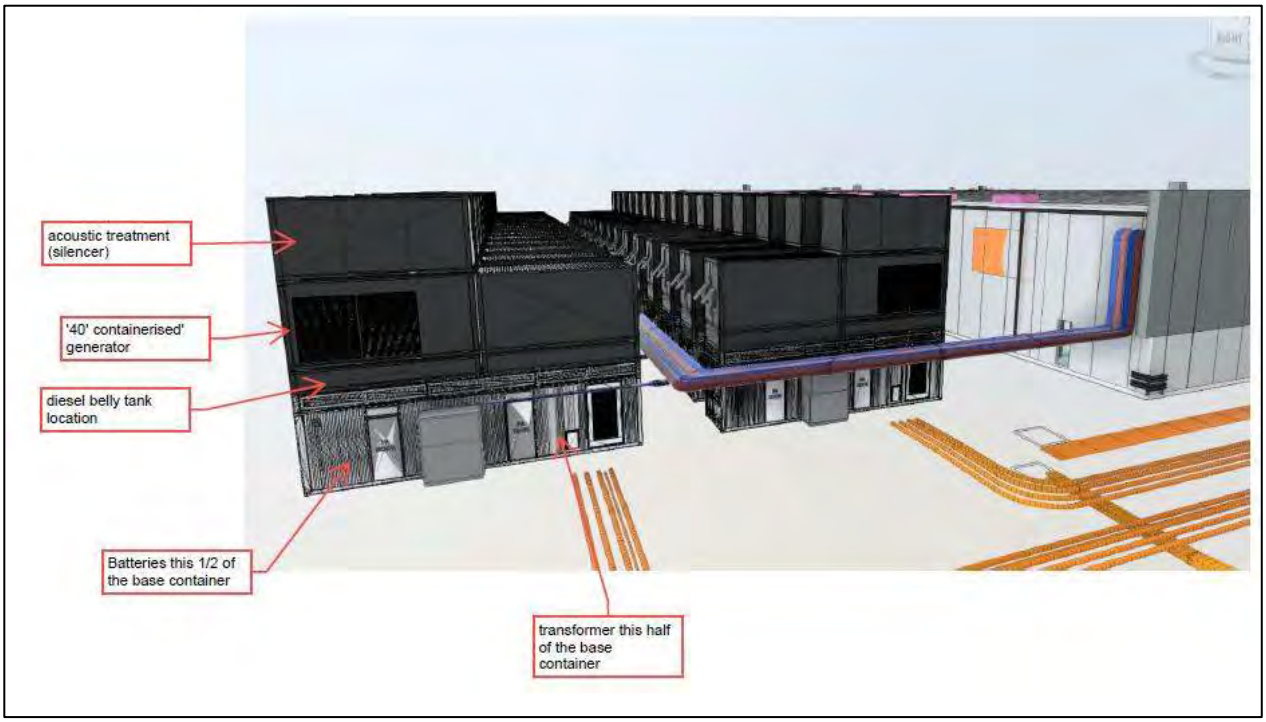


Figure 4. Example schematic of UPS diesel generators.

The principal bushfire-related risk is that hazardous goods may be exposed to bushfire attack, including radiant heat, flame contact from unmanaged vegetation, ember attack, smoke, elevated ambient temperatures, and potential fire spread from adjacent infrastructure.

The BHMP has been prepared to reduce the exposure of the UPS generators and associated hazardous goods to bushfire attack by establishing and maintaining a hazard management area around the entire facility. The hazard management area is intended to reduce the likelihood of direct flame contact and reduce radiant heat exposure to the generator units and associated hazardous goods. The generator units are also containerised, which provides an additional level of separation from external bushfire exposure, subject to detailed design, ventilation, access, and emergency response requirements.

A Dangerous Goods Assessment for a similar type of development has been prepared by Pitt & Sherry and is included at Appendix 3. This assessment is based on a similar UPS generator design. That assessment identifies dangerous goods expected to be stored and used at the site and considers relevant storage and handling requirements, including AS/NZS 1940, AS/NZS 4681, AS/NZS 5139, the *Work Health and Safety Act 2012*, and the *Work Health and Safety Regulations 2022*.

A project-specific dangerous goods assessment has not been undertaken for this proposal to date and should be undertaken prior to the detailed design phase of the project.

4.2.1 Diesel storage

Each generator will store up to 10,000 L of diesel. Diesel will be stored in a double-bunded tank incorporated into the generator stack. The diesel storage must meet the requirements of AS/NZS 1940, including

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requirements for tank design, separation distances, placarding, manifest requirements, fire protection and spill containment.

From a bushfire perspective, diesel storage is most vulnerable where elevated radiant heat, direct flame contact, or fire spread from adjacent combustible materials could affect tanks, pipework, vents or fill points. The hazard management area specified in the BHMP are intended to reduce this exposure. Detailed design must also ensure that diesel tanks, pipework and associated infrastructure are protected from physical damage, located with suitable separation from ignition sources, and provided with access for emergency response.

4.2.2 Engine oil storage

Each generator will contain approximately 400 L of engine oil, stored within the generator engine. Engine oil is classified as a C2 combustible liquid. The storage of engine oil must comply with AS/NZS 1940.

From a bushfire perspective, engine oil is primarily vulnerable to heating or fire spread within each generator, and potential involvement in a fire if containment is compromised. The containerised generator arrangement and BHMP hazard management area will reduce exposure to direct bushfire attack. Fire protection and emergency response provisions must be consistent with the Pitt & Sherry recommendations, including suitable extinguishing media and avoiding water jet use where this may spread burning liquid.

4.2.3 LiFePO4 battery storage

LiFePO4 batteries will be associated with the generator stacks and associated electrical infrastructure. LiFePO4 batteries are classified as Class 9 dangerous goods. Pitt & Sherry note that although LiFePO4 batteries do not trigger placarding or manifest requirements under Schedule 11 of the WHS Regulations, they present specific hazards that must be managed through risk assessment and controls under the WHS Act.

Relevant hazards include fire, explosive gas release, chemical leakage and toxic fumes during a battery fire. From a bushfire perspective, the key vulnerability is exposure to heat, flame contact, ember attack, mechanical damage, or fire spread from adjacent combustible materials, including diesel or generator infrastructure.

Battery systems must be installed in accordance with AS/NZS 5139 and the manufacturer's requirements. Pitt & Sherry identify that battery systems should be protected from mechanical and environmental damage, have clear access for maintenance and emergency response, and be protected from heat sources, water, humidity, dust, vermin and direct sunlight. Pitt & Sherry also recommend that a risk assessment be undertaken by a suitably qualified fire engineer to confirm that the location of battery systems relative to diesel tanks and generators does not increase the risk of fire propagation.

This fire engineering risk assessment, together with the storage, separation, access, placarding, manifest, SDS and fire protection measures identified by Pitt & Sherry, must be incorporated into the detailed design, operational procedures and emergency management arrangements for the facility.

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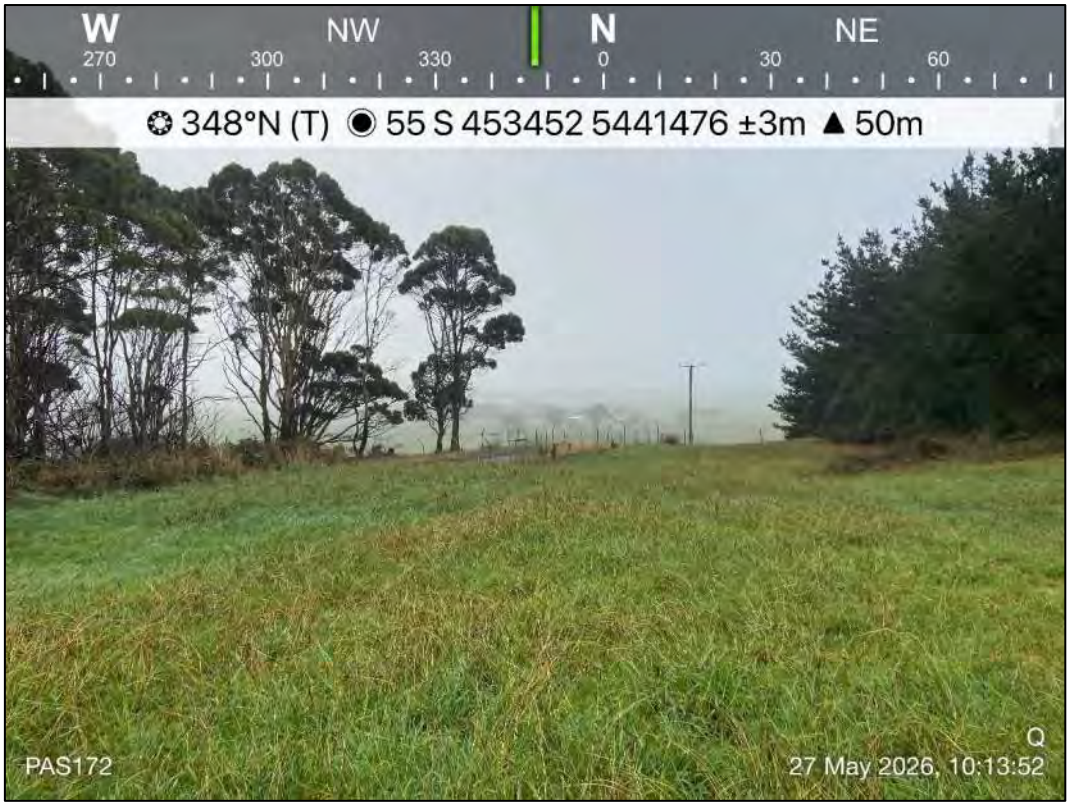


Plate 1. Looking to the north nearby the northern boundary of the lot – Grassland in foreground, pine plantation to the NE and remnant Eucalypt woodland to the NW classified as Forest.



Plate 2. Agricultural land to the south of the Transend switch yard - Grassland.

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Plate 3. Transend switch yard directly south of the lot - LTV.



Plate 4. Agricultural land to the west of the lot - Grassland.

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Plate 5. Looking east into Mill Park precinct – built infrastructure classified as Low threat vegetation, adjoining pine plantation classified as Forest.

5 BUSHFIRE ATTACK LEVEL ASSESSMENT

This Bushfire Attack Level (BAL) assessment has been conducted in accordance with Clause 2.2 Simplified Procedure – Method 1 of AS3959:2018.

Table 1 and Figure 5 identify the site characteristics within a 140 m assessment area and provide the dimensions for the hazard management area required to achieve a BAL 12.5 solution, based on Table 2.5 of AS 3959:2018. All aspects have been resolved to BAL 12.5 through the bushfire protection measures specified in the BHMP.

The BAL assessment and associated BHMP have been prepared to support compliance with the *Tasmanian Planning Scheme C13.0 Bushfire-Prone Areas Code*[6] and *Directors Determination – Bushfire Hazard Areas v1.2*[7]. Requirements for hazard management areas, water supply for firefighting, and vehicle access and egress for firefighting are included in the BHMP and must form part of the Building Surveyor's Certificate of Likely Compliance assessment.

The bushfire protection measures have been assessed using a Fire Danger Index of 80 (FDI 80). This is beyond the minimum FDI 50 benchmark historically applied in this area and has been adopted to provide additional redundancy in the assessment, consistent with recent advice from the Tasmania Fire Service for a similar scoped development. Future changes to the development layout, hazardous goods storage arrangements, vegetation condition, or vegetation extent may alter the bushfire risk and would require further assessment.

[6] Tasmanian State Government (2025)

[7] Director of Building Control (2024)

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Note: All distances are based on information provided by the client.

Limitations: All measurements have been made using standard practices and may contain small errors of precision. Compliance with AS 3959:2018 construction standards and implementation of the BHMP does not remove all risk to life or property from bushfire. Bushfire behaviour is inherently variable and may exceed the conditions modelled under AS 3959:2018, including under weather or fuel conditions more severe than those represented by FDI 80. The safest option during a bushfire event is to leave early, where safe to do so, in accordance with emergency warnings and advice from the relevant authorities.

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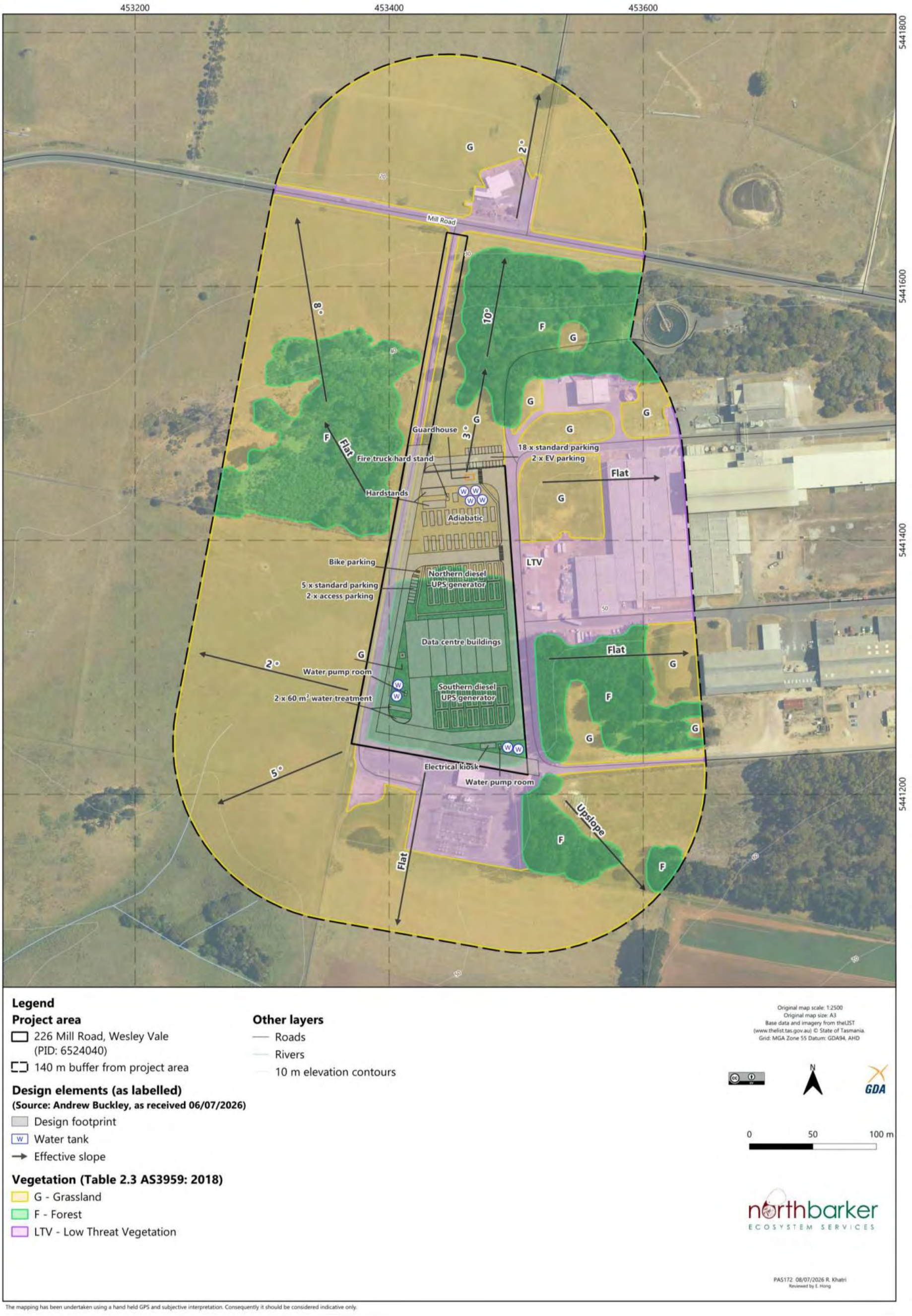


Figure 5. Site analysis plan. The red polygon surrounding the site delineates a 140 m buffer of all proposed AI data centre design elements (excluding non-habitable structure) at 226 Mill Road, Wesly Vale. All vegetation has been assessed as per Table 2.3 of AS3959: 2018.

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Table 2. BAL assessment. Vegetation has been classified as per Table 2.5 of AS3959: 2018[8].

Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
Guardhouse – Class 5							
North	Low threat vegetation	0 - 5°	0 – 21 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	21 – 53 m		20 m	50 m	N/A
	Forest	0 - 5°	53 – 85 m		50 m	100 m	N/A
		5 - 10°	85 - 140		61 m	100 m	N/A
Northeast	Low threat vegetation	0 - 5°	0 – 32 m	BAL 12.5	0 m* HMA to carpark boundary for continuity 37 m	0 m	Low threat vegetation
	Grassland	0 - 5°	32 – 55 m		20 m	50 m	N/A
	Forest	0 - 5°	55 – 100 m		50 m	100 m	N/A
		5 - 10°	100 – 140 m		61 m	100 m	N/A
East	Low threat vegetation	Flat	0 – 43 m	BAL 12.5	0 m* HMA to lot boundary for continuity 31 m	0 m	Low threat vegetation
	Grassland	Flat	43 – 103 m		17 m	50 m	N/A

[8] AS3959: 2018

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Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
	Low threat vegetation	Flat	103- 140 m		0 m	0 m	Low threat vegetation
Southeast	Low threat vegetation	Flat	0 – 49 m	BAL 12.5	0 m* HMA to Lot boundary for continuity 40 m	0 m	Low threat vegetation
	Grassland	Flat	49 – 87 m		17 m	50 m	N/A
	Low threat vegetation	Flat	87 – 140 m		0 m	0 m	Low threat vegetation
South	Low threat vegetation	Upslope	0 – 140 m	BAL LOW	0 m	0 m	Low threat vegetation
Southwest	Low threat vegetation	Upslope	0 – 75 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	75 – 140 m		20 m	50 m	N/A
West	Low threat vegetation	Flat/upslope	0 – 49 m	BAL 12.5	0 m* HMA to Lot boundary for continuity 43 m	0 m	Low threat vegetation
	Grassland	Flat	49 – 61 m		17 m	50 m	N/A
	Forest	Flat / upslope	61 – 140 m		42 m	100 m	N/A
Northwest	Low threat vegetation	0 - 5°	0 – 57 m	BAL 12.5	0 m* HMA to Lot boundary for continuity	0 m	Low threat vegetation

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Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
					46 m		
	Grassland	0 - 5°	57 – 70 m		20 m	50 m	N/A
	Forest	5 - 10°	70 – 140 m		61 m	100 m	N/A
Data Centre Building – Class 7b							
North	Low threat vegetation	0 - 5°	0 – 133 m	BAL LOW	0 m*	0 m	Low threat vegetation
	Grassland	0 - 5°	133 – 140 m		20 m	50 m	N/A
Northeast	Low threat vegetation	Flat	0 – 75 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	Flat	75 – 130 m		50 m	100 m	N/A
	Low threat vegetation	Flat	130 – 140 m		0 m	0 m	Low threat vegetation
East*	Low threat vegetation* NB: based on the proposed minimum clearance of 20 m of pine plantation on title ref 187534/3. **Subject to part v agreement.**	Flat	0 – 42 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Forest	Flat	42 – 112 m		42 m	100 m	N/A
	Grassland	Flat	112 – 140 m		17 m	50 m	N/A
Southeast*	Low threat vegetation* NB: based on the proposed minimum	Flat	0 – 55 m	BAL 12.5	42 m	100 m	N/A

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Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
	clearance of 20 m of pine plantation on title ref 187534/3. **Subject to part v agreement**.						
	Grassland	Flat	55 – 90 m		17 m	50 m	N/A
	Forest	Flat	90 – 140 m		42 m	100 m	N/A
South	Low threat vegetation	Flat	0 – 87 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	Flat	87 – 140 m		17 m	50 m	N/A
Southwest	Low threat vegetation	0 - 5°	0 – 50 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	50 – 140 m		20 m	50 m	N/A
West	Low threat vegetation	0 - 5°	0 – 22 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	22 – 140 m		20 m	50 m	N/A
Northwest	Low threat vegetation	Flat	0 – 26 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	Flat	26 – 109 m		17 m	50 m	N/A
	Forest	Flat	109 – 140 m		42 m	100 m	N/A
Northern Diesel UPS generator bank - Class 8							
North	Low threat vegetation	0 - 5°	0 – 92 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	92 – 109 m		20 m	50 m	N/A
	Forest	0 - 5°	109 – 140 m		50 m	100 m	

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Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
Northeast	Low threat vegetation	Flat	0 – 25 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	Flat	25 – 110 m		17 m	50 m	N/A
	Low threat vegetation	Flat	110 – 140 m		0 m	0 m	Low threat vegetation
East	Low threat vegetation	Flat	0 – 140 m	BAL LOW	0 m	0 m	Low threat vegetation
Southeast*	Low threat vegetation* NB: based on the proposed minimum clearance of 20 m of pine plantation on title ref 187534/3. **Subject to part v agreement.**	Flat	0 – 65 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Forest	Flat	65 – 140 m		42 m	100 m	N/A
South	Low threat vegetation	Flat	0 – 140 m	BAL LOW	0 m	0 m	Low threat vegetation
Southwest	Low threat vegetation	0 - 5°	0 – 70 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	70 – 140 m		20 m	50 m	N/A
West	Low threat vegetation	0 - 5°	0 – 32 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	32 – 140 m		20 m	50 m	N/A
Northwest	Low threat vegetation	Flat	0 – 36 m	BAL 12.5	0 m	0 m	Low threat vegetation

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Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
	Grassland	Flat	36 – 43 m		17 m	50 m	N/A
	Forest	Flat	43 – 140 m		42 m	100 m	N/A
Southern Diesel UPS generator bank - Class 8							
North	Low threat vegetation	0 - 5°	0 – 140 m	BAL LOW	0 m	0 m	Low threat vegetation
Northeast*	Low threat vegetation* NB: based on the proposed minimum clearance of 20 m of pine plantation on title ref 187534/3. **Subject to part v agreement.**	Flat	0 – 55 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Forest	Flat	55 – 85 m		42 m	100 m	N/A
	Low threat vegetation	Flat	85 – 140 m		0 m	0 m	Low threat vegetation
East*	Low threat vegetation* NB: based on the proposed minimum clearance of 20 m of pine plantation on title ref 187534/3. **Subject to part v agreement.**	Flat	0 – 42 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Forest	Flat	42 – 115 m		42 m	100 m	N/A
	Low threat vegetation	Flat	115 – 140 m		0 m	0 m	Low threat vegetation

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Quadrant	Effective vegetation class under Table 2.3 AS3959: 2018	Effective slope (degrees)	Distance under effective slope (m)	BAL value for each quadrant	Compliant defendable space required for BAL-12.5 (m)	Compliant defendable space required for BAL-LOW (m)	Exclusions of low threat vegetation under Table 2.2.3.2 (e) AS3959: 2018
Southeast*	Low threat vegetation* NB: based on the proposed minimum clearance of 20 m of pine plantation on title ref 187534/3. **Subject to part v agreement.**	Flat	0 – 53 m	BAL 12.5	0 m	0 m	Low threat vegetation
	Forest	Flat	53 – 66 m		42 m	100 m	N/A
	Low threat vegetation	Flat	66 – 78 m		0 m	0 m	Low threat vegetation
	Grassland	Flat	78 – 140 m		17 m	50 m	N/A
South	Low threat vegetation	Flat	0 – 53 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	Flat	53 – 140 m		17 m	50 m	N/A
Southwest	Low threat vegetation	Flat	0 – 80 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	80 – 140 m		20 m	50 m	N/A
West	Low threat vegetation	0 - 5°	0 – 58 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	58 – 140 m		20 m	50 m	N/A
Northwest	Low threat vegetation	0 - 5°	0 – 64 m	BAL LOW	0 m	0 m	Low threat vegetation
	Grassland	0 - 5°	64 – 140 m		20 m	50 m	N/A

The applicable bushfire attack level is BAL-12.5

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6 REQUIRED BUSHFIRE PROTECTION MEASURES

The proposal must meet the requirements of the Tasmanian Planning Scheme Bushfire-Prone Areas Code C13.5[9]. All future planned building work related to the proposal is required to comply with the Directors Determination – Bushfire Hazard Areas v.1.2[10]. These documents have been developed to ensure that use and development is designed, located, serviced and constructed to reduce the risk to human life and property, and the cost to the community, caused by bushfires.

Each required element of protection is discussed in the following sections 7 and 8 of the report. The required protective features have been consolidated in the bushfire hazard management plan enclosed as Appendix 1. Specifications for each required element can be found in Appendix 2.

7 PLANNING COMPLIANCE

7.1 TASMANIAN PLANNING SCHEME – BUSHFIRE-PRONE AREAS CODE (C13.0)

The proposal must meet requirements of the Under the Tasmanian Planning Scheme – C13.0 Bushfire-Prone Areas Code.

Under C13.3.1 a hazardous use means a use where:

(a) hazardous chemicals of a manifest quantity are stored on a site; or

(b) explosives are stored on a site and where classified as an explosives location or large explosives location as specified in the *Explosives Act 2012*.

Given the proposal includes the storage and use of diesel, engine oil and lithium-iron batteries of a manifest quantity[11] it meets the definition as a hazardous use and therefore must meet the use standards set out in clause C13.5.2 Use Standards for Hazardous Use (Table 3). A dangerous goods assessment for a similar type of development is enclosed as Appendix 3.

Table 3. Use standards C13.5.2 Hazardous Use.

C13.5.2 Objective		
Hazardous uses can only be located on land within a bushfire-prone area where tolerable risks are achieved through mitigation measures that take into account the specific characteristics of both the hazardous use and the bushfire hazard.		
A1	No Acceptable Solution	Performance Criteria **P1** must be met (see below)

[9] Tasmanian State Government (2025)

[10] Director of Building Control (2024)

[11] See Appendix 3 – Dangerous Goods Assessment for similar type of development

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C13.5.2 Performance Criteria		
P1 A hazardous use must only be located in a bushfire-prone area if a tolerable risk from bushfire can be achieved and maintained, having regard to:		
(a)	The location, characteristics, nature and scale of the use;	The proposed development is a utility-scale AI and data processing facility located within the established Mill Park industrial precinct. The site is positioned within a General Industrial zoned estate that already supports industrial, utility and infrastructure-based land uses, including the adjoining Wesley Vale Transend substation. The broader setting is a modified rural-industrial landscape, with remnant pine plantation, agricultural land and existing industrial infrastructure surrounding the development footprint. The use is infrastructure-based rather than manufacturing or public-facing, with operations largely internalised within purpose-built buildings and managed as a secure, controlled facility. While the facility includes electrical infrastructure and standby diesel power generation, these elements are integral to the operation of critical digital infrastructure and will be designed and managed in accordance with relevant safety, environmental and fire protection requirements. The scale and nature of the development are consistent with the industrial zoning and the established character of Mill Park as a location for large-format industrial and infrastructure uses. The proposed bushfire protection measures include a BAL 12.5 hazard management area, calculated using a conservative FDI 80 design scenario, rather than the minimum FDI 50 typically applied in Tasmania. This provides a higher level of redundancy in the BHMP assessment and supports the conclusion that a tolerable level of bushfire risk can be achieved and maintained for the proposed use, having regard to its location, characteristics, nature and scale.
(b)	Whether there is an overriding benefit to the community;	The facility provides critical digital infrastructure that supports economic development, digital capability and infrastructure resilience at regional, state and national levels. Its location within the established Mill Park industrial precinct is appropriate given the availability of industrial-zoned land, proximity to existing utility infrastructure, and separation from sensitive uses. The proposal delivers community benefit through investment, employment and increased infrastructure capacity. The location within an existing industrial estate also avoids the need to establish this type of use on land with greater sensitivity, such as residential areas, land containing native vegetation of conservation significance, or productive agricultural land.
(c)	Whether there is no suitable alternative lower-risk site;	The Mill Park industrial precinct is zoned and established for industrial, utility and infrastructure-based uses. The site provides access to existing infrastructure and separation from sensitive land uses such as residential zoned land, schools and other vulnerable use. While bushfire-prone vegetation occurs in proximity of the site, risk can be managed through appropriate bushfire hazard management, compliant access, firefighting water supply and appropriate building design.
(d)	The emergency management strategy (hazardous use) and bushfire management plan; and	A TFS endorsed Emergency Management Strategy (Hazardous Use) for the proposal has been prepared and is enclosed as Attachment A.

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(e)	Other advice, if any, from the TFS.	Consultation with the Tasmania Fire Service has been undertaken as part of the development assessment process. Detailed design documentation, including hazardous materials inventories, fire protection systems and emergency response procedures, will be provided to support TFS review. All recommendations or requirements of the TFS will be incorporated into the final design and extra redundancy has been incorporated into the BHMP by adopting a more conservative approach to the BAL assessment.

C13.5.2 Acceptable Solution		
A2	An emergency management strategy (hazardous use) endorsed by the TFS or accredited person.	The proposed development is a hazardous use and requires the adoption of a site-specific emergency management strategy. An emergency management strategy that provides relevant details of the site, risk analysis to occupants of the site and demonstrates how risk to occupants will be managed is attached as Attachment A. Subject to adoption of the bushfire emergency management strategy, the project will comply with the requirements for emergency planning[12].
A3	A bushfire hazard management plan that contains appropriate bushfire protection measures that is certified by the TFS or an accredited person.	A certified Bushfire Hazard Management Plan containing the required bushfire protection measures is enclosed as Appendix 1. Appropriate protection measures are detailed in Sections 8.1 – 8.5 of this report and include establishment and ongoing maintenance of the hazard management area, BAL 12.5 separation distances, firefighting water supply, vehicle access and ongoing maintenance of the HMA. The BAL 12.5 separation distances have been calculated using a conservative FDI 80 design scenario, rather than the minimum FDI 50 design basis that is required in Tasmania. This provides an additional level of redundancy in the BAL assessment and ensures that the required BAL 12.5 outcome is maintained under a more severe design fire weather scenario.

8 BUILDING COMPLIANCE

8.1 DIRECTORS DETERMINATION – BUSHFIRE HAZARD AREAS V1.2 (2024)

The *Director's Determination – Bushfire Hazard Areas* (Director's Determination) applies to building work in bushfire-prone areas for Class 1, 2, 3, 8, 9, and 10a buildings[13].

The deemed-to-satisfy solutions (DtS) relevant to the proposed development are addressed below.

8.2 REQUIREMENTS FOR HAZARD MANAGEMENT AREA

A hazard management area (HMA) is a fuel-reduced area surrounding a building that provides separation from bushfire-prone vegetation. This area functions as a defendable space, enabling safer access for

[12] Tasmania Fire Service (2017)

[13] Director of Building Control (2024)

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emergency services and improving the ability for occupants and firefighters to protect the building during a bushfire event.

Vegetation and other fuels within the HMA must be managed to minimise the potential for fire spread, both at ground level and through the canopy. When appropriately established and maintained, the HMA reduces the risk of:

- Direct flame contact with the building;
- Exposure to elevated levels of radiant heat; and
- Ember attack.

In accordance with Clause 2.3.4 of the Director's Determination – Bushfire Hazard Areas v1.2, development associated with the use, handling, generation or storage of hazardous materials must be provided with a hazard management area no smaller than the separation distances required for the Bushfire Attack Level (BAL) determined within a certified Bushfire Hazard Management Plan (BHMP).

The bushfire hazard assessment and consequent BHMP (Appendix 1) has undertaken a site-specific assessment of bushfire risk, including consideration of:

- The type, scale and storage characteristics of hazardous materials proposed on site
- The surrounding vegetation classification and fuel characteristics
- Topography, effective slope and separation distances; and
- The defendability of the building and surrounding area

Based on this assessment, a BAL 12.5 outcome has been derived for the proposed development, subject to the establishment and ongoing maintenance of the hazard management areas shown on the BHMP. The assessment has been undertaken using a Fire Danger Index of 80, which is more conservative than the minimum FDI 50 design scenario typically applied under AS 3959: 2018 in Tasmania. This provides additional redundancy in the bushfire assessment and supports the conclusion that a tolerable level of bushfire risk can be achieved and maintained for the proposed use.

To achieve the required BAL 12.5 hazard management area, removal of approximately 0.2 ha of Forest vegetation associated with pine plantation directly east/southeast of the development footprint is required on the adjoining Mill Park lot. As this land is outside the development title, an agreement must be established between Firmus and the owner of 226 Mill Road, Wesley Vale (PID: 6524040, Title Ref: 187534/3) prior to occupation/use of the facility. This agreement should be secured through a Part V agreement, or an equivalent legally enforceable mechanism, to allow Firmus to establish and maintain that land as part of the hazard management area in a low-fuel condition for the life of the development.

The BAL 12.5 outcome is therefore contingent on implementation of the off-title hazard management area arrangement, in addition to the bushfire protection measures specified in the BHMP.

The Pitt & Sherry Dangerous Goods Assessment identifies requirements for storage, placarding, manifest procedures, fire protection, separation, SDS review, and further risk assessment for LiFePO4 batteries relative to diesel tanks and generators. In particular, Pitt & Sherry recommend that a risk assessment be undertaken by a suitably qualified fire engineer to confirm that the location of battery systems relative to diesel tanks and generators does not increase the risk of fire propagation. These measures are to be incorporated into detailed design, operational procedures and emergency management arrangements for the facility.

The following recommendations are made:

- *Prior to occupation/use of the development, Firmus must secure an agreement with the owner of the adjoining Mill Park lot to allow removal of 20 m of pine plantation directly east/southeast of the development footprint – as illustrated in the BHMP (Appendix 1). The agreement must allow this*

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land to be incorporated into the hazard management area and maintained in a low-fuel condition. The agreement should be secured through a Part V agreement, or an equivalent legally enforceable mechanism, and must remain in place for the life of the development.

- *The HMA is to be established prior to commencement of operation and verified by a licensed building surveyor;*
- *The HMA is to be managed in accordance with the prescriptions outlined in Table 4 to maintain a low fuel condition;*
- *Any dangerous goods mitigation measures identified in a project-specific dangerous goods assessment are to be implemented as part of detailed design and operation of the facility; and*
- *The HMA is to be maintained for the life of the operation of the facility to ensure that the assessed bushfire risk, including the adopted BAL-12.5, remains valid over time.*
- *Subject to implementation of the BHMP, the proposed development is considered capable of achieving Deemed-to-Satisfy compliance with the hazard management area requirements under Clause 2.3.4 of the Director's Determination – Bushfire Hazard Areas v1.2.*

Responsibility for implementation and ongoing maintenance of the HMA rests with Firmus.

Table 4. Hazard management area establishment and maintenance schedule.

Bushfire hazard management area establishment and maintenance schedule		**Timing**
Trees within the HMA	Remove all native and exotic trees within the extent of the HMA	As a part of establishment of the HMA, and then as necessary.
Understory vegetation within HMA	Maintain ground cover vegetation (mow, slash, rake) including grasses to within 100 mm.	As a part of establishment of the HMA, and then as often as necessary.
	Provide heat shields and ember traps on the bushfire prone side of buildings such as non-flammable fencing or low flammability shrubs and small trees.	As a part of establishment of the HMA.
	Maintain vegetation clearances around access and water supply points.	As a part of establishment of the HMA, and then as necessary.
Within 10 m of building	Clear out any accumulated leaf and other debris from roof gutters and other debris accumulation points.	Annually in spring
	Non-flammable features such as driveways, paths and paving are encouraged as part of design and landscaping.	As a part of establishment of the HMA

8.3 CONSTRUCTION STANDARD

All habitable buildings as well as all buildings associated with the storage of manifest quantities of hazardous goods (UPS diesel generators) are to be designed and constructed in accordance with the requirements of

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AS 3959: 2018 Section 5 for a Bushfire Attack Level of BAL-12.5, as determined by the Bushfire Hazard Management Plan (Appendix 1).

Construction to BAL-12.5 will provide protection against ember attack and low levels of radiant heat, consistent with the assessed bushfire hazard at the site.

- *Subject to implementation of the BHMP the proposal will comply with the requirements for building under Clause 2.3.1 of the Directors Determination – Bushfire Hazard Areas v1.2.*

8.4 PROPERTY ACCESS

Access to the site is Mill Road. The existing private access to the site is via a bitumen sealed road which is 3.5 m in wide and greater than 200 m in length.

The proposed access within the facility includes a sealed road 6 m in width that encircles the data centre and UPS generator buildings.

To meet the Deemed-to-Satisfy provisions, the proposal must comply with Table 2, Element (d) of the Director's Determination – Bushfire Hazard Areas v1.2. The existing access from Mill Road does not currently meet these provisions, as it is less than the required minimum carriageway width. The access road from Mill Road must therefore be upgraded/widened to provide a minimum 4 m carriageway width for the full length of the access.

- *The existing private access road from Mill Road crossover must be upgraded to provide a minimum 4 m carriageway width for its full length and one passing bay of an additional 2 m width and 20 m length must be installed in accordance with Table 2, Element (B and C) of the Director's Determination – Bushfire Hazard Areas v1.2.*
- *Subject to the widening/upgrade of the access from Mill Road crossover and implementation of the BHMP, the proposed development is considered capable of achieving Deemed-to-Satisfy compliance with the requirements for property access under Clause 2.3.2 of the Director's Determination – Bushfire Hazard Areas v1.2.*
- *Access should be verified as compliant by a licensed building surveyor prior to operation.*

8.5 WATER SUPPLY FOR FIRE FIGHTING

The site is not connected to a reticulated water supply. Accordingly, water for firefighting purposes will be provided via a dedicated on-site system comprising static water storage, pumps, and hydrant/booster infrastructure, designed to function as a reticulated firefighting water supply.

The proposed design includes two large static water tanks, a fire water pump system, hydrant/booster connections, and an appropriately designed hardstand area to facilitate access and operation by firefighting appliances.

While the system is not connected to the reticulated water network, the inclusion of pumps, boosters and hydrant infrastructure means it will function as a reticulated firefighting water system across the site and is therefore treated as such for the purposes of compliance.

The firefighting water supply system is to be designed and constructed to achieve the performance intent of Table 3A of the Director's Determination – Bushfire Hazard Areas v1.2, including:

- Provision of firefighting water points accessible to fire appliances;

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- Location of all parts of the building within 120 m of a firefighting water point, as measured by hose lay;
- Provision of compliant hardstand areas adjacent to firefighting water points; and
- System design consistent with relevant standards for hydrant and pump installations.

Notional locations for compliant firefighting hydrants are provided in the Bushfire Hazard Management Plan (Appendix 1).

It is acknowledged that the proposed system is not connected to reticulated water supply. Accordingly, further detail of the system, including pump capacity, flow rates, and hydrant performance, will be required at the detailed design phase of the project to demonstrate that the system is equivalent to a reticulated firefighting water supply.

The following recommendations are made:

- *The firefighting water supply system is to be installed and commissioned prior to commencement of operation and verified by a licensed building surveyor;*
- *Hydraulic design and certification is to be provided by a suitably qualified professional to demonstrate system performance;*
- *All parts of each building are to be located within 120 m of a compliant firefighting water point, as measured by hose lay; and*
- *The system is to be maintained for the life of the development to ensure ongoing availability and reliability for firefighting purposes.*
- *Subject to detailed design and implementation of the BHMP, the proposed system is considered capable of achieving Deemed-to-Satisfy compliance with the requirements for water supply for firefighting under Clause 2.3.3 of the Director's Determination – Bushfire Hazard Areas v1.2.*

8.6 REQUIREMENTS FOR EMERGENCY PLANNING

Building application stage

Under clause 2.3.5 of the Directors Determination – Bushfire Hazard Areas v1.2 (1) and (2) a bushfire emergency plan that is consistent with the TFS Bushfire Emergency Planning Guideline[14] and approved by the TFS must be prepared for the facility. The bushfire emergency plan will be informed by the bushfire emergency management strategy which is included as Attachment A.

The bushfire emergency plan must be reviewed annually for currency and updated as required.

The bushfire emergency plan is a stand-alone document that details what occupants and visitors to a site should do in preparation, response, and following a bushfire emergency.

- *Subject to the development and implementation of the bushfire emergency plan which must be reviewed and endorsed by the TFS, the proposal is considered capable of achieving Deemed-to-Satisfy compliance with the requirements for bushfire emergency planning under Clause 2.3.5 of the Director's Determination – Bushfire Hazard Areas v1.2.*

[14] Bushfire Risk Unit (2025)

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8.7 SUMMARY OF COMPLIANCE REQUIREMENTS

Table 5. Compliance with Directors Determination – Bushfire Hazard Areas v1.2.

Direction	Deemed to satisfy requirements (Elements)	Requirement	Compliance
2.3.1	Construction requirements	AS 3959 – 2018 – BAL 12.5 or *NASH Standard – Steel Framed Construction in Bushfire Areas*	TBD by building surveyor. The BAL for each proposed building within the Facility has been determined using the minimum separation distances detailed in Table 2.5 of AS3959: 2018. All habitable building proposed within the Facility must be designed and constructed to meet a minimum BAL 12.5 standard. Higher levels of construction are acceptable.
2.3.2	Property access	Table 2 (B and C)	Access to the site is from Mill Road via an existing private access road that is greater than 200 m in length, bitumen sealed and approximately 3 m wide. To meet the Deemed-to-Satisfy requirements of Table 2, Element (B and C) the existing access must be upgraded / widened to provide a minimum 4 m carriageway width for its full length, and one passing bay of an additional 2 m width and 20 m length must be installed. The proposed internal access road is approximately 6 m wide and can meet the relevant access requirements. Civil design will be prepared by a civil designer and verified by a licensed building surveyor.
2.3.3	Water supply for fire fighting	Table 3A (A-D)	The proposal is not within serviced land for water and sewerage. So, the water supply for firefighting purposes will be provided from a static water supply. The design includes two, large static water tanks, a fire water pump room and boosters and appropriate hardstand area. While the system is not connected to a reticulated water network, the inclusion of pumps, boosters and hydrant infrastructure means it will function as a reticulated firefighting water system across the site and is therefore treated as such for the purposes of compliance. To meet the Deemed-to-Satisfy requirements of Table 3A (Elements A-D) firefighting water supplies must be designed and constructed to comply with the Table 3A which includes that all buildings to be protected must be within 120 m of hydrant. Consultation with a suitably qualified hydraulic engineer is required to confirm the design of the water reticulation and fire

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Direction	Deemed to satisfy requirements (Elements)	Requirement	Compliance
			hydrant system. The fire hydrant system must be designed and installed in accordance with AS 2419.1: 2021. Notional locations for compliant hydrants have been included in the BHMP in Appendix 1. Civil design will be prepared by a civil designer and verified by a licensed building surveyor.
2.3.4	Hazard management areas	Table 4 (E)	Compliance is subject to the hazard management area being established and maintained in accordance with the certified bushfire hazard management plan attached as Appendix 1. To achieve the required HMA, removal of 0.2 ha of pine plantation classified as Forest is required on the adjoining Mill Park lot. As this land is outside the development title, Firmus must secure a Part V agreement, or equivalent legally enforceable arrangement, with the owner of 226 Mill Road, Wesley Vale (PID: 6524040, Title Ref: 187534/3) to allow for the establishment and ongoing maintenance of that land as part of the hazard management area in a low-fuel condition for the life of the development. The HMA must be established prior to operation and verified as compliant by a licensed building surveyor or bushfire practitioner.
2.3.5	Bushfire emergency plan	Table 5 (A)	Compliance is subject to the adoption of a site-specific bushfire emergency plan (including a bushfire action plan and evacuation plan) that have been endorsed by the TFS. The bushfire emergency plan will be informed by the emergency management strategy which is enclosed as Attachment A. The bushfire emergency plan must be in place prior to operation of the facility and must be reviewed annually for currency and updated as required.

9 CONCLUSION

A site for a proposed AI Data Factory has been selected at 226 Mill Road, Wesley Vale (PID: 6524040, Title Ref: 187534/1) within the Mill Park industrial precinct. The factory is proposed to be run 24/7 and will employ approximately 10 staff during the daytime shift and around 4 staff during each evening/night shift.

A Bushfire Attack Level (BAL) assessment determined the facility to be BAL 12.5, requiring all buildings to be designed and constructed to a minimum BAL 12.5 standard. The assessment has been undertaken using a Fire Danger Index of 80, which is beyond the minimum compliance benchmark in Tasmania and provides additional redundancy in the bushfire assessment.

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This report demonstrates that the Facility can meet the requirements for planning under the *Tasmanian Planning Scheme – Latrobe, Bushfire-Prone Areas Code C13.5.2 (hazardous uses)*.

The detailed design of the factory will incorporate advice from the bushfire hazard report and enclosed bushfire hazard management plan and attached bushfire emergency management strategy to ensure staff safety and operational control during an emergency.

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APPENDIX 1. BAL 12.5 BUSHFIRE HAZARD MANAGEMENT PLAN

Bushfire Hazard Management Plan - BAL 12.5

SCHEDULE OF REQUIREMENTS

1. BUILDING DESIGN AND CONSTRUCTION

- SPECIFIED SEPARATION DISTANCES FOR THE GUARDHOUSE, NORTHERN AND SOUTHERN DIESEL UPS GENERATORS AND DATA CENTRE BUILDINGS PROVIDE FOR A BAL-12.5 SOLUTION. THESE BUILDINGS MUST BE DESIGNED AND CONSTRUCTED TO COMPLY WITH AS3959: 2018 – SECTION 3 FOR GENERAL REQUIREMENTS AND SECTION 5 FOR BAL 12.5 REQUIREMENTS.
- HIGHER LEVEL OF CONSTRUCTION ARE ACCEPTABLE.
- ALL DESIGN PLANS TO BE VERIFIED BY A LICENSED BUILDING SURVEYOR PRIOR TO THE ISSUE OF A CERTIFICATE OF LIKELY COMPLIANCE.

2. PROPERTY ACCESS

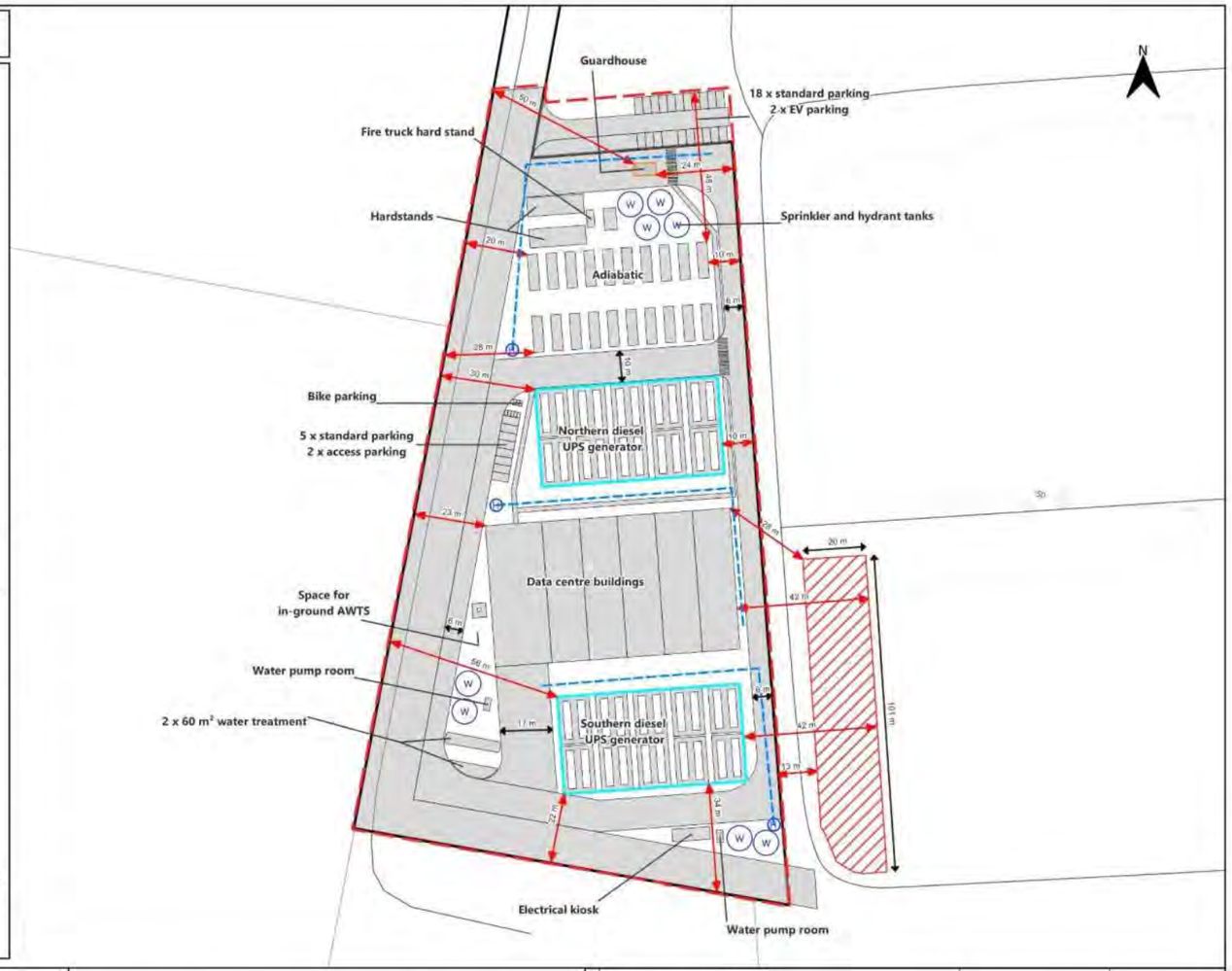
- EXTERNAL ACCESS TO THE FACILITY FROM MILL ROAD IS VIA A SEALED TWO-WAY ROAD AND IS A MINIMUM 7 M IN WIDTH.
- PRIVATE ACCESS TO THE FACILITY FROM MILL ROAD IS VIA AN EXISTING SEALED ROAD WHICH IS CURRENTLY 3 M WIDTH AND GREATER THAN 200 M IN LENGTH. THE WIDTH OF THIS ACCESS MUST BE UPGRADED TO A MINIMUM 4 M WIDTH AND ONE PASSING BAY OF AN ADDITIONAL 2 M WIDTH AND 20 M LENGTH MUST BE INSTALLED.
- INTERNAL ACCESS TO THE FACILITY IS PROVIDED WITH A MINIMUM 6 M WIDE ROAD THAT ENCIRCLES THE UPS GENERATORS AND DATA CENTRE BUILDINGS.
- CIVIL DESIGN WILL BE PREPARED BY A CIVIL DESIGNER AND VERIFIED BY A LICENSED BUILDING SURVEYOR.

3. RETICULATED WATER SUPPLY FOR FIREFIGHTING

- CONSULTATION WITH HYDRAULIC ENGINEER IS REQUIRED FOR THE RETICULATION AND FIRE HYDRANT SYSTEM. THE FIRE HYDRANT SYSTEM MUST BE DESIGNED AND INSTALLED IN ACCORDANCE WITH AS2419.1: 2021.
- A FIREFIGHTING WATER SUPPLY MUST BE LOCATED WITHIN 120 M (MEASURED AS HOSELAY) OF ALL HABITABLE BUILDINGS AND HAZARDOUS USES WITHIN THE FACILITY.
- CIVIL DESIGN WILL BE PREPARED BY A CIVIL DESIGNER AND VERIFIED BY A LICENSED BUILDING SURVEYOR.

4. HAZARD MANAGEMENT AREA

- ESTABLISH HAZARD MANAGEMENT AREA AS DIMENSIONED ON THIS PLAN
- THE BUSHFIRE PROTECTION MEASURES (INCLUDING THE BUSHFIRE HAZARD MANAGEMENT AREA) HAVE BEEN ASSESSED USING A FIRE DANGER INDEX OF 80 (FDI 80). THIS IS BEYOND THE MINIMUM FDI 50 BENCHMARK HISTORICALLY APPLIED IN THIS AREA AND HAS BEEN ADOPTED TO PROVIDE ADDITIONAL REDUNDANCY IN THE ASSESSMENT, CONSISTENT WITH ADVICE FROM THE TASMANIA FIRE SERVICE.
- THE HMA MUST BE MAINTAINED IN A LOW FUEL CONDITION IN PERPETUITY, ENSURING FUELS ARE REDUCED SUFFICIENTLY AND OTHER HAZARDS ARE REMOVED SUCH THAT THE FUELS AND OTHER HAZARDS DO NOT SIGNIFICANTLY CONTRIBUTE TO THE BUSHFIRE ATTACK.
- LIMITED AMOUNTS OF LOW FLAMMABILITY PLANTS FOR LANDSCAPING ARE ACCEPTABLE WITHIN THE HMA INCLUDING MAINTAINED LAWNS (KEPT TO A NOMINAL HEIGHT OF 100 MM), PATHS, PAVING, AND LOW FLAMMABILITY ORNAMENTAL PLANTINGS.
- HAZARD MANAGEMENT AREA SHOULD BE IMPLEMENTED PRIOR TO OCCUPANCY AND VERIFIED BY A LICENSED BUILDING SURVEYOR.
- A PART 5 AGREEMENT BETWEEN THE OWNER OF 226 MILL ROAD, WESLEY VALE (TITLE REF: 187534/1) AND 226 MILL ROAD, WESLEY VALE (TITLE REF: 187534/3) MUST BE IN PLACE TO MANAGE A MINIMUM OF 20 m OF FOREST VEGETATION BEYOND THE EASTERN BOUNDARY OF THE LOT AS DIMENSIONED IN THIS PLAN. THIS AGREEMENT MUST BE IN PLACE AND THE HAZARD MANAGEMENT AREA ESTABLISHED PRIOR TO OCCUPANCY.



Legend

Project area
- 226 Mill Road, Wesley Vale

Design elements (as labelled)
(Source: Andrew Buckley, as received 06/07/2026)
- Design footprint
- Guardhouse: On-site bushfire refuge
- Water tank

Hazard Management Area (HMA)
- HMA
- HMA subject to Part 5 agreement
- Distance to HMA (m)
- Dimension lines (m)
- 120 m hose lay

Other layers
- Water hydrant
- Cadastral parcels
- Roads
- 10m elevation contours
- Dangerous goods associated with each of the backup UPS diesel generators include:
  - Diesel – 10,000 L per generator
  - Engine oil – 400 L per generator
  - LiFePO4 batteries – 90 per generator stack, approx. 6,345 kg per generator stack (TBC).

Building name	NCC Building Classification
Guardhouse	Class 5
Diesel UPS generators	Class 8
Data centre buildings	Class 7b

PROPERTY DETAILS

Applicants name: Pitt and Sherry (obo Firmus Pty Ltd)
Municipality: Latrobe
Address: 226 Mill Road, Wesley Vale
PID: 6524040
Title Ref: 187534/1
Proposal: AI Data Centre

To be read in conjunction with Proposed AI Data Centre. 226 Mill Road, Wesley Vale, Bushfire Report and Hazard Management Plan. North Barker Ecosystem Services, July 2026
Assessor: Cameron Geeves BFP-178
Scope of accreditation 1, 2, 3A, 3B and 3C
Assessment date: 07/07/2026

Original map scale: 1:1500
Original map size: A3
Base data and imagery from: theLIST (www.thelist.tas.gov.au) © State of Tasmania
Grid: MGA Zone 55 Datum: GDA94, AHD

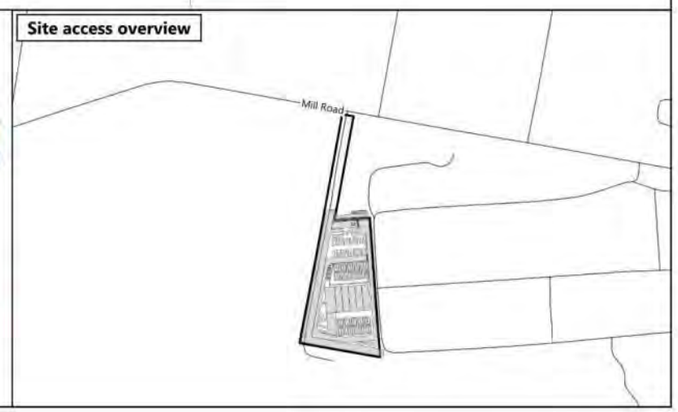
GDA

0 25 50 m

northbarker ECOSYSTEM SERVICES

PAS172: 09/07/2026 R. Khatri
Reviewed by E. Hoag

Site access overview



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APPENDIX 2. SPECIFICATIONS FOR ACCESS, WATER SUPPLY AND HAZARD MANAGEMENT AREAS.

Table 2: Requirements for Property Access

Element		Requirement
A	Property access length is less than 30 m; or access is not required for a fire appliance to access a fire fighting water point.	There are no specified design and construction requirements.
B	Property access length is 30m or greater; or access is required for a fire appliance to a fire fighting water point.	The following design and construction requirements apply to property access: (a) all-weather construction; (b) load capacity of at least 20t, including for bridges and culverts; (c) minimum carriageway width of 4m; (d) minimum vertical clearance of 4m; (e) minimum horizontal clearance of 0.5m from the edge of the carriageway; (f) cross falls of less than 3 degrees (1:20 or 5%); (g) dips less than 7 degrees (1:8 or 12.5%) entry and exit angle; (h) curves with a minimum inner radius of 10m; (i) maximum gradient of 15 degrees (1:3.5 or 28%) for sealed roads, and 10 degrees (1:5.5 or 18%) for unsealed roads; and (j) terminate with a turning area for fire appliances provided by one of the following: (i) a turning circle with a minimum outer radius of 10m; or (ii) a property access encircling the building; or (iii) a hammerhead "T" or "Y" turning head 4m wide and 8m long.
C	Property access length is 200 m or greater.	The following design and construction requirements apply to property access: (a) the requirements for B above; and (b) passing bays of 2m additional carriageway width and 20m length provided every 200m.
D	Property access length is greater than 30 m, and access is provided to 3 or more properties.	The following design and construction requirements apply to property access: (a) complies with requirements for B above; and (b) passing bays of 2m additional carriageway width and 20m length must be provided every 100m.

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Table 3A: Requirements for Reticulated Water Supply for Firefighting

Element		Requirement
A.	Distance between building to be protected and water supply	The following requirements apply: (a) the building to be protected must be located within 120 metres of a fire hydrant; and (b) the distance must be measured as a hose lay between the firefighting water point and the furthest part of the building.
B.	Design criteria for proposed fire hydrants	The following requirements apply: (a) fire hydrant system must be designed and constructed in accordance with TasWater Supplement to Water Supply Code of Australia WSA 03 – 2011-3.1 MRWA Edition V2.0 as amended from time to time; and (b) fire hydrants are not installed in parking areas.
C.	Hardstand associated with proposed fire hydrants	A hardstand area for fire appliances must be provided: (a) no more than thirty metres from the hydrant measured as a hose lay; (b) no closer than six metres from the building to be protected; (c) with a minimum width of three metres and a minimum length of six metres constructed to the same standard as the carriageway; and (d) connected to the property access by a carriageway equivalent to the standard of the property access.
D.	Additional requirements for Certain Class 9 Buildings	Refer to NCC Vol. 1 – Part G5 (incorporating TAS G5P1 and TAS G5P2) and Specification 43.

Table 4: Requirements for Hazard Management Area

Element		Requirement
A.	New buildings on lots provided with a BAL at the time of subdivision.	A new building must: (a) be provided with a HMA no smaller than the required separation distances required for BAL-19, except where a higher BAL was approved as part of the subdivision bushfire hazard management plan; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
B.	New buildings on lots not provided with a BAL at the time of subdivision.	A new building must: (a) be located on the lot so as to be provided with a HMA no smaller than the separation distances required for BAL 29; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
C.	Alterations or additions to buildings.	An alteration or addition to a building must: (a) be located on the lot so as to be provided with a HMA which:

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		(i) has the separation distances required for the BAL assessed for the construction of the existing building; or (ii) in the case of a building without an existing BAL assessment, is no smaller than the separation distances required for BAL-29; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
D.	Hazard management areas for new buildings and additions and alterations to buildings classified as an accommodation building Class 1b, Class 2, or Class 3, other than communal residence for persons with a disability, a respite centre or a residential aged care facility of similar	A new building or an alteration or addition must: (a) be located on the lot so as to be provided with HMAs no smaller than the separation distances required for BAL 12.5; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
E.	Hazard management areas for new buildings and additions and alterations to existing buildings classified as vulnerable use as defined in the relevant planning scheme.	A new building or an addition or alteration including change of use must: (a) be located on the lot so as to be provided with HMAs no smaller than the separation distances required for BAL 12.5; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
F.	Hazard management areas for new buildings or additions and alterations to buildings associated with the use, handling, generation or storage of a hazardous chemical or explosive.	A new building or an alteration or addition, including change of use, for a building associated with the use, handling, generation or storage of a hazardous chemical must: (a) be located on the lot so as to be provided with a HMA no smaller than the required separation distances for the BAL determined in the certified bushfire hazard management plan; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
G.	Additional requirements for Certain Class 9 Buildings and associated Class 10a Buildings and decks.	Refer to NCC Vol. 1 – Part G5 (incorporating TAS G5P1 and TAS G5P2) and Specification 43.

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APPENDIX 3. DANGEROUS GOODS ASSESSMENT

pitt&sherry

Pitt & Sherry
(Operations) Pty Ltd
ABN 67 140 184 309

Phone 1300 748 874
info@pittsh.com.au
pittsh.com.au

Located nationally —
Melbourne
Sydney
Brisbane
Hobart
Launceston
Newcastle
Devonport

Memo

To Andrew Buls

From Sarah Brown

Date 22 June 2026

RE **Dangerous Goods Assessment – Firmus Southgate**

An assessment of the dangerous goods expected to be stored and used at Firmus Southgate site has been conducted to determine the following:

- Comparison of the expected quantities compared to the Placard and Manifest quantities prescribed in Schedule 11 of the WHS Regulations (2022)
- Storage and handling requirements of dangerous goods with reference to safety data sheets and the following Australian Standards and legislation:
  - AS/NZS: 1940 The storage and handling of flammable and combustible liquids
  - AS/NZS 4681: The storage and handling of Class 9 (Miscellaneous) dangerous goods
  - Work Health and Safety Act 2012
  - Works Health and Safety Regulations 2022; and
  - WorkSafe Tasmania Storage of Hazardous Chemicals requirements.

1. Dangerous goods quantities

Table 1 shows the type and expected storage quantity of dangerous goods in comparison to the Placard and Manifest quantities of Schedule 11 of the WHS Regulations.

Table 1: Dangerous goods quantities compared to placarding and manifest quantities

Dangerous Good/GHS Hazard	Expected storage quantity	Placarding Quantity	Manifest quantity
Diesel • Flammable liquids - Category 4 • Aspiration Hazard - Category 1 • Carcinogenity - Category 2 • Skin Irritation - Category 2 • Acute Toxicity (Inhalation) - Category 4 • Specific Target Organ Toxicity - Repeated Exposure - Category 2 • Hazardous to the Aquatic Environment - Chronic - Category 2	921.6 kL	10 kL	100 kL

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Dangerous Good/GHS Hazard	Expected storage quantity	Placarding Quantity	Manifest quantity
Engine Oil • C2 – Combustible liquid	15.3 kL	Not included in Schedule 11 of the Work Health and Safety Regulations for chemicals requiring placards or manifests.	
Lithium Iron Phosphate ($LiFePO_4$) Batteries • Class 9 – Miscellaneous dangerous substances and articles	504,000 kg	Not included in Schedule 11 of the Work Health and Safety Regulations for chemicals requiring placards or manifests.	

2. Placarding requirements

The quantity of diesel expected to be stored on site is above the placarding quantity for Category 4 Flammable Liquids prescribed in schedule 11 of the WHS regulations. Therefore, placards must be used to provide warning of the stored diesel and to meet the placarding requirements of Schedule 13 of the WHS regulations. The following placarding requirements are in accordance with *Placarding for Storage of Hazardous Chemicals* (WorkSafeTasmania, March 2014)

2.1 Placard location

Outer warning placards must be located at each entrance where an emergency service organisation may enter the workplace.

For hazardous chemicals stored in an indoor area, placards must be as close to the main entrance of the building and at the entrance to each room or walled section of the building where the hazardous chemicals are stored.

For hazardous chemicals in an outdoor area, placards must be on or adjacent to each container or storage area for bulk hazardous chemicals. Placards must also be at each entrance to a storage area in which packaged hazardous chemicals are stored.

Placards must be made of durable and weather-resistant material and be clearly legible by anyone approaching the placard. They must also be separated from any other sign or writing that contradicts, qualifies or distracts attention from the placard.

2.2 Placard format

2.1.1 Outer warning placard

An outer warning placard must be located at a workplace when the quantity of hazardous chemicals present exceeds Schedule 11 of the Regulations. Outer warning placards must:

- display the word 'HAZCHEM' in red letters on a white or silver background; and
- conform to the format and dimensions in Figure 1.



Figure 1: Form and minimum dimensions of an outer warning placard.

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2.1.2 Bulk container placards

Providing diesel tanks don't share a spill compound with other categories of flammable liquids, the placard of the tanks must be as shown in Figure 2



Figure 2: Template for a placard for a hazardous chemical stored in bulk

3. Manifest requirements

The quantity of diesel expected to be stored on site is above the manifest quantity for Category 4 Flammable Liquids prescribed in schedule 11 of the WHS regulations. Therefore, notification must be made to WorkSafe Tasmania that Firmus – Southgate will be a manifest quantity workplace (MQW). The notification must include a site layout plan detailing location of dangerous goods and essential services, including fire hose reels, extinguishers, isolation points for fuel and power and all drains on site.

Firmus must also:

- manage risks to health and safety associated with the hazardous chemicals
- keep an up-to-date register of hazardous chemicals
- provide correct labelling, safe handling and access to safety data sheets for hazardous chemicals
- ensure there is appropriate placarding in place
- maintain an up-to-date manifest of the hazardous chemicals on-site, for use by emergency services; and
- submit a notification of a manifest quantity workplace application to a service centre, by post or email, along with a copy of your manifest.

They must also notify WorkSafe if:

- there is a change of person running the MQW
- the quantity of Schedule 11 hazardous chemicals no longer exceeds MQW quantities; and
- there is a significant change to the risk of using, handling or storing of hazardous chemicals.

4. Storage requirements

The storage requirements for each dangerous substance are based on Australian Standards and safety data sheets for each substance available in the public domain. Once suppliers of these products are confirmed, the safety data sheets provided from the chemical supplier should be checked to ensure compliance with specific storage requirements for each substance.

4.1 Diesel

Diesel fuel is classified as a C1 combustible liquid under the Australian Dangerous Goods Code (ADG Code) and a Category 4 Flammable liquid under the Globalised Harmonised System of Classification and Labelling of Chemicals (GHS).

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The firmus site is expected to have 72 generators which each have a bunded 10,400 L belly tank and a 2,400 L day tank, which is filled from the primary generator tank. Both the belly tank and day tank are integrally bunded with the bund having the required containment capacity (RiskCon, 2025). The overall general arrangement of the Power Train Unit (PTU) and generator is provided in Appendix A.

The expected quantities of diesel are provided in Table 2

Table 2: Expected quantities of diesel

Type of storage	Storage configuration	Storage quantity
Belly tanks	10,400 L belly tank beneath each generator.	748.8 kL
Day tanks	2,400 L day tank for each generator	172.8 kL
Total		921.6 kL

The diesel storage must meet the requirements for above-ground storage tanks defined in Section 5.9 of *AS 1940: The storage and handling of flammable and combustible liquids*. An assessment of the diesel tank storage against AS 1940:2017 was prepared by Riskcon Engineering Pty Ltd (Riskcon) and is attached in Appendix B.

4.1.1 Separation distances

Section 5.7 of *AS 1940: The storage and handling of flammable and combustible liquids* provide tank spacing requirements. The separation distance required from the tanks to on-site protected places including workshops, office buildings, warehouses, or buildings where amenities blocks is dependent on the maximum capacity of each tank according to Table 3, and determined by Table 5.4 of AS1940. Since the belly tanks have a capacity of 10.4kL, the minimum distance to a protected place is 4m.

Table 3:Separation distances to on-site protected places

Maximum capacity of each tank (kL)	Minimum Distance (m)
10	3
20	4

Appendix C and shows the plant layout with distances between the diesel tanks and protected places and these are summarised in Table 4. The distances between the diesel tanks and in-site protected places are greater than the minimum required distance of 4m.

Table 4: Distance between diesel tanks and on-site protected places

Protected Place	Distance from diesel tanks (m)
Offices (LST02)	10
Offices (LST03(	11
Workshop (LST02)	17
Workshop (LST03)	14

Section 5.7.6 of AS 1940 states that the distance between horizontal tanks shall be at least 600 mm. Figure 3 shows that the distance between these tanks is a minimum of 2.1 m which is greater than 600 mm. According to the Dangerous Goods assessment conducted by Riskcon, the manufacturer has noted that the tank has been designed according to the requirements in AS 1692 and AS 1940. Riskcon's assessment states that the day tank does not count as a separate tank requiring separation as it is integral to the generator.

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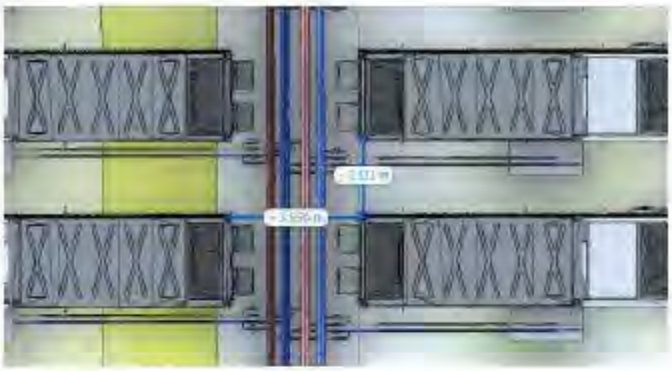


Figure 3: Distance between diesel tanks

4.1.2 Fire Protection requirements

Section 11.12 of *AS 1940: The storage and handling of flammable and combustible liquids* provide requirements for fire protection for above ground tanks containing Class 1 combustible liquids of aggregate capacity of 60 m^3 to 2000 m^3. The installation shall be provided with:

- A hose reel and foam-making equipment complying with Clause 11.5.3 of AS1940, for use when the water supply is adequate; or
- Two powder-type extinguishers plus additional sets of fire extinguishers shall be provided for multiple tank installations, as required.

The maximum travel distance to access a fire extinguisher shall not exceed 15 m.

Section 11.5.3 of *AS1940* requires that fire hose reels shall be fitted with suitable foam making equipment capable of producing at least 27 L/min of foam solution at a minimum of 220 kPa for 30 minutes and should comply with AS/NZS 1221 and AS 2441.

4.2 Engine Oil

Engine oil has an ADG classification of a C2 Combustible liquid. The expected location and quantities are provided in Table 5.

Table 5: Expected quantities of Engine Oil

Type of storage	Storage location	Storage configuration (Gen = generator)	Storage quantity
Engine oil within Generator Engine	LST02	213 L/Gen x 32 Gen = 6.816 kL	6.816 kL
Engine oil within Generator Engine	LST02 - Mechanical Services Backup	213 L/Gen x 8 Gen = 1.704 kL	1.704 kL
Engine oil within Generator Engine	LST03	213 L/Gen x 32 Gen = 6.816 kL	6.816 kL
		Total	15.336 kL

According to a generic SDS for engine oil in the public domain, it should be stored in a well-ventilated place away from ignition sources, oxidising agents, foodstuffs and clothing. Containers should be kept closed when not in use. The storage will need to comply with AS1940 according to the methods in which it is supplied and stored on site.

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4.2.1 Fire fighting requirements

The fire-fighting measures for Engine Oil as provided in the generic SDS are as follows:

Fire-fighting recommendations:

If safe to do so, remove containers from path of fire. Keep storage tanks, pipelines, containers, fire exposed surfaces cool with water spray. Avoid spreading liquid and fire by water flooding.

Suitable Extinguishing media:

Use foam, sand, carbon dioxide or dry chemical.

Unsuitable Extinguishing media:

Do not use water jet. Water may cause splattering.

4.3 Lithium Iron Phosphate ($LiFePO_4$) Batteries

$LiFePO_4$ batteries have an ADG classification of a Class 9 dangerous good which covers miscellaneous dangerous substances and articles. The expected location and quantities are provided in Table 6

Table 6: Expected quantities of Lithium Iron Phosphate batteries

Type of storage	Storage location	Number of batteries	Storage quantity
Mechanical Equipment	LST02	280	280,000 kg
Mechanical Equipment	LST03	224	224,000 kg
		Total	504,000 kg

Although $LiFePO_4$ are not listed in the manifest quantities in Schedule 11 of the Work Health and Safety (WHS) regulations, they still present specific hazards that must be managed appropriately. Firmus will have obligations as a Person Conducting a Business or Undertaking (PCBU) under Sections 19 of the WHS Act 2012 to ensure, so far as is reasonably practicable, that the site is without risk to health and safety. This requires a risk assessment and implementation of controls to eliminate or minimise risks as far as reasonably practicable.

In correspondence from T.Moore (Firmus) received by Y.Edward (pitt&sherry) on 26/11/2025 it was confirmed that the battery system does not include integrated power conversion equipment. As such, the installation does not meet the definition of a Battery Energy Storage Systems (BESS) which comprises power conversion equipment, a battery system and isolation and protection devices.

Accordingly, *AS5139: Safety installations – Safety of battery systems for use with power conversion equipment* is not directly applicable. However, the standard as been adopted as guidance for risk control measures, as the hazards associated with $LiFePO_4$ batteries are comparable to those addressed AS/NZS 5139.

4.3.1 Hazards associated with $LiFePO_4$ Batteries

The following hazards are applicable to $LiFePO_4$ batteries.

- Electrical hazard: Risk of electric shock and arc flash
- Energy hazard: High stored energy can cause dangerous discharges
- Mechanical hazard: Physical damage can lead to failure
- Fire hazard: Thermal runaway, internal faults or external fire exposure may result in fire.
- Explosive gas hazard: Overcharging or thermal events may vent gases

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- Chemical hazard: Electrolyte leakage can cause burns and environmental harm; and
- Toxic Fume hazard: Burning batteries may release toxic gases (e.g., HCl, HCN, HF, CO).

4.3.2 Location and layout considerations

Section 3.2.2.1 of *AS 4681: Storage and Handling of Class 9 (miscellaneous) dangerous goods and articles* specifies that there are no specific separation distances (other than those required by the Building Code of Australia for normal fire protection) for the storages for lithium batteries.

In the absence of prescriptive location requirements, battery placement should consider surrounding equipment, access requirements and potential exposure hazards,

It is recommended that the following be considered:

- Batteries should be installed in locations that minimise the risk of damage from operational activities, maintenance, or external impacts
- Adequate access should be provided for installation, inspection, maintenance, and emergency response
- The battery installation should be arranged to avoid exposure to potential ignition sources or high heat environments
- Openings, penetrations and interfaces with adjacent spaces should be designed to prevent the migration of liquids, gases or fire into or out of the battery enclosure

Consideration should be given to the location of the batteries beneath the diesel fuel storage and generators and the design should demonstrate that any fuel leak, spill, or fire event from above will not result in exposure of the battery system below.

4.3.3 Environmental requirements

The battery system should be installed and operated with environmental conditions specified by the manufacturer with consideration of the following recommended controls.

- Install within the recommended temperature range for the battery'
- Protect against ingress of water, dust and contaminants
- Prevent exposure to direct sunlight or localised heat sources
- Limit exposure to vermin
- Adequate ventilation to prevent accumulation of heat or gases

Heat sources of particular relevance to this installation include generators located above the battery system. The design should demonstrate that heat transfer from the generator will not adversely impact battery performance or increase the likelihood of failure.

4.3.4 Fire Protection

The battery system should be designed so that it does not contribute to, or propagate a fire, this means using suitable barriers and materials to prevent the fire from spreading from the battery to other parts of the building.

It is recommended that the following controls be considered:

- Provision of physical barriers between the battery system and the diesel tanks to reduce the potential for fire propagation
- Selection of non-combustible or fire-resistant materials in construction of battery enclosures and surrounding structures.

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5. Chemical Handling

Chemical handling should be compliant with the specific requirements detailed in the chemical Safety Data Sheets (SDS) provided by the chemical suppliers. The SDS will provide details on the chemical hazards, safe handling procedures and emergency measures applicable to the chemical being supplied. Once suppliers of these products are confirmed, the safety data sheets provided from the chemical supplier should be reviewed to develop appropriate handling procedures for each substance.

6. Conclusion

The assessment confirms that the Firmus - Southgate site will store and handle a range of dangerous goods, including diesel, engine oil and Lithium Iron Phosphate (LiFePO4) batteries. Diesel quantities exceed regulatory placarding and manifest thresholds, requiring compliance with Work Health and Safety (WHS) Regulations and Australian Standards for placarding, notification, and risk management.

Although $LiFePO_4$ batteries and other substances do not trigger placarding or manifest requirements under Schedule 11 of the WHS regulations, they present specific hazards that must be managed through robust risk assessment and controls, as required under Section 19 of the WHS Act 2012. The report outlines storage requirements for each substance, referencing relevant Australian Standards (AS/NZS 1940, AS/NZS 4681) and safety data sheets.

Firmus must ensure ongoing compliance by:

- Implementing appropriate placarding and manifest procedures for diesel.
- Maintaining up-to-date registers and manifests of hazardous chemicals.
- Conducting risk assessments and applying controls for all dangerous goods, especially LiFePO4 batteries. Specifically, it is recommended that a risk assessment be carried out by a suitably qualified fire engineer to ensure that the location of batteries relative to diesel tanks and generators does not increase the risk of fire propagation.
- Reviewing supplier safety data sheets to confirm and update handling procedures.
- Notifying WorkSafe Tasmania of manifest quantity status once the layout has been finalised and notify WST of any significant changes in the future.

These recommendations are provided to assist Firmus- Southgate in managing is WHS obligations and supporting the health and safety of workers and community, with reference to applicable legislation and best practice.

Yours sincerely

Sarah Brown

Sarah Brown
Process Safety Engineer

Enc: General Arrangement of the PTU and generator
Dangerous Goods Report, RiskCon Engineering Pty Ltd
Plant Layout with separation distances between diesel tanks and on-site protected places

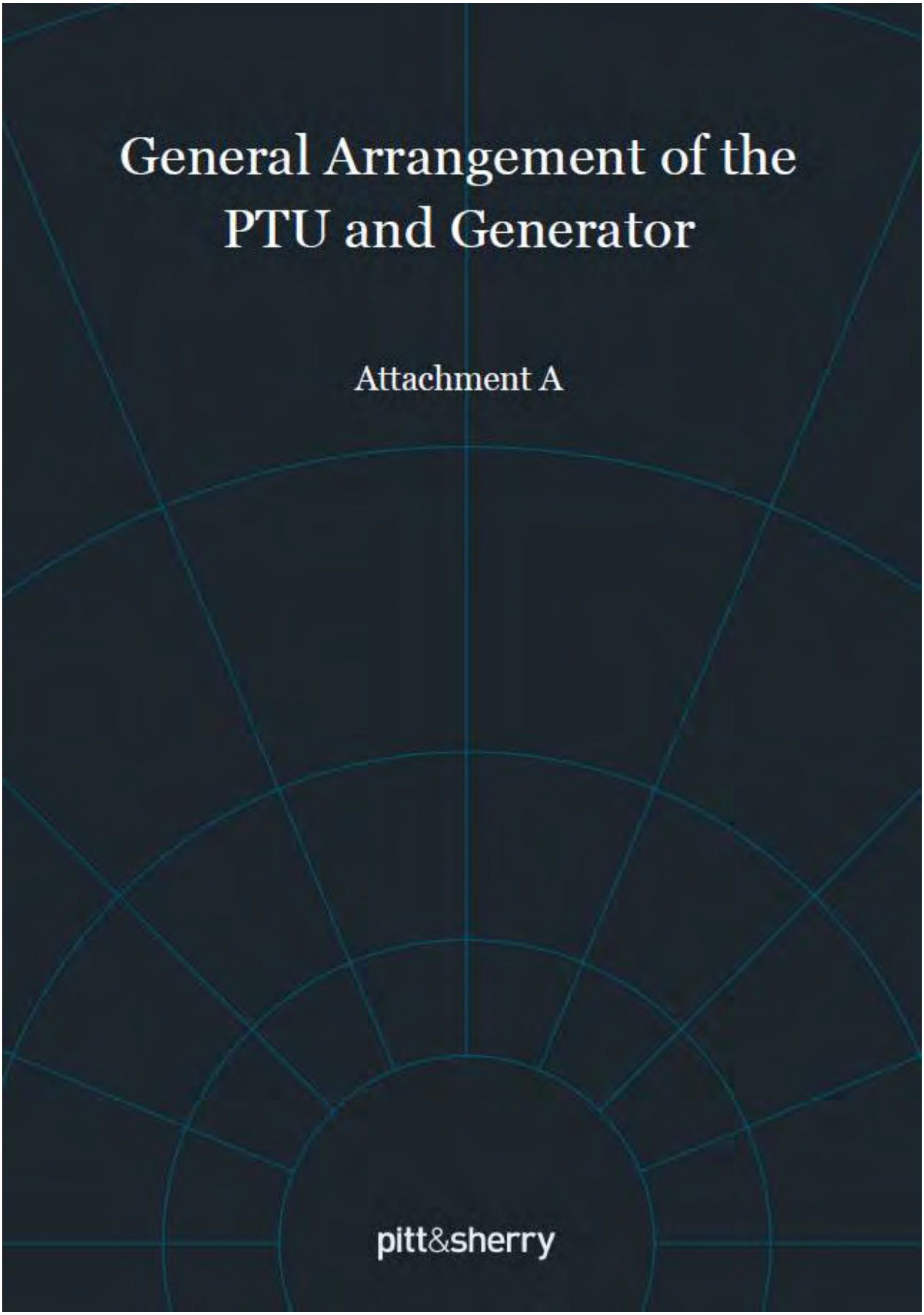
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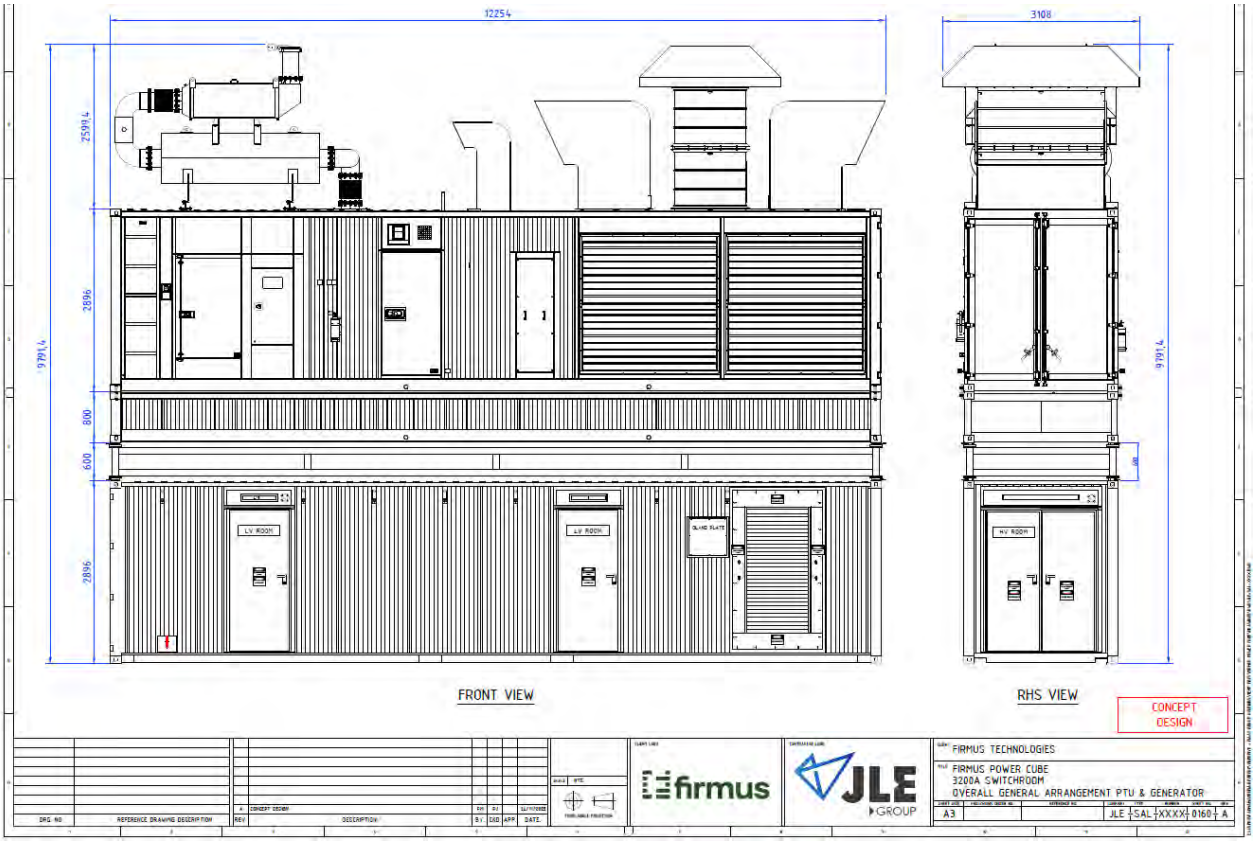
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Dangerous Goods Report, RiskCon Engineering Pty Ltd

Attachment B

pitt&sherry

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Riskcon engineering

Riskcon Engineering Pty Ltd
37 Pogson Drive
Cherrybrook NSW 2126
ABN 74 626 753 820
www.Riskcon-eng.com

Dangerous Goods Report

Project:	Fuel Tank Assessment	**Ref No.:**	RCE-25605
From:	Renton Parker	**Date:**	3rd December 2025
		Revision:	0

	Attention	Company	Email
To:	Peter Johnson	JLE Manufacture & Hire	peter.johnson@jlegroup.net.au

Re: Fuel Tank Compliance Assessment

1.0 Introduction

1.1 Background

JLE Manufacture & Hire Pty Ltd (JLE) is installing a 2,500 KVA generator stacked on a containerised switch room. The generator has a bunded 7,000 L tank and a 2,400 L day tank which is filled from the primary generator tank.

The storage of the diesel fuel in the tank is subject to the TAS Work Health and Safety Regulation 2022 (Ref. [1]) which requires the risks associated to be assessed and minimised So Far As Is Reasonably Practicable (SFAIRP) which may be demonstrated by complying with an applicable design standard. Combustible liquids are subject to AS 1940:2017 (Ref. [1]) which provides the design requirements for location, separation, ventilation and fire protection. It is also necessary to confirm whether the location of the diesel generator above the switch room container is acceptable.

To assist with compliance, JLE has engaged Riskcon Engineering Pty Ltd (Riskcon) to prepare a DG assessment for the diesel tank storage against AS 1940:2017. This document represents the findings of the assessment.

1.2 Scope of Services

The scope of work is to prepare an assessment of the new 7,000 L storage tank and the 2,400 L day tank against AS 1940:2017.

2.0 Methodology

The following methodology has been proposed:

- Review the storage capacities for each storage area and prepare a review of the fuel storage tanks against AS 1940:2017 (Ref. [1]).
- Where non-compliance is identified, make recommendations to rectify the non-compliance.
- Prepare a rereport outlining the assessment and findings.

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3.0 Assessment

3.1 Introduction

The day tank has a volume of 2,400 L and is integrally bunded in nature. Similarly, the proposed 7,000 L storage tank is integrally bunded. A summary of the fuel storage is provided in **Table 3-1**. The layout of the site and the location of the tank can be seen in **Appendix A**.

Table 3-1: Dangerous Goods Stored On-site

Location	Class	Description	PG	Quantity (L)
Day tank	C1	Diesel	n/a	2,400
Fuel tank				7,000

3.2 Day Tank Review Against AS 1940 Review

A review of the WHS Regulation 2022 indicates that Clause 328(4b) applies which states:

"fuel, oils or coolants in a container fitted to a vehicle, vessel, aircraft, mobile plant, appliance or other device, if the fuel, oil or coolant is intended for use in the operation of the device."

Therefore, the fuel in the day tank would not strictly speaking be subject to the Regulation. Notwithstanding this, for conservatism, a clause-by-clause assessment of the day tank against AS 1940:2017 is provided in **Table 3-2**. A summary of the recommendations made from the assessment are provided below.

- The day tank shall be appropriately marked with the tank specific details.
- Any pipework intended to be connected to the tank shall be labelled to identify the contents as a combustible liquid.
- One (1) powder type-extinguishers shall be provided at the generator.

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Table 3-2: Day Tank AS 1940:2017 Compliance Assessment

Clause	Requirement	Assessment	Recommendations
5.2.1	A static storage tank shall be designed and constructed to comply with AS 1692 or an equivalent Standard for the category of tank appropriate to the application. A Category 1 tank shall not be used for flammable liquid.	The tank used for the storage of diesel has been designed in accordance with the appropriate standard (AS 1692 and AS1940) as detailed in the manufacturer's specification sheet. No flammable liquid is stored on-site.	No action required.
5.2.2	For above-ground tanks: i. Markings shall be displayed on the outside walls of the tanks and shall not be less than 500 mm in height for tanks having a diameter of 6 m or greater. For tanks of less than 6 m diameter the markings shall be not less than 150 mm in height. ii. The bottom of markings shall be above the crest of the main bund and any plant, equipment and piping on or above the bund. iii. Where possible, the markings shall be clearly visible from main alternative access points likely to be used by the fire authority. iv. Where there is a foam pumphouse or manifold for the control of firefighting foam, one such marking shall be clearly visible from that point or its close proximity. v. Where there is a cluster of vertical tanks of 6 m diameter or greater or tanks are not separated as given in Table 5.3, the tanks shall have similar markings affixed to the roof with the numerals of 6 and 9 underbarred. vi. All markings shall be of a colour contrasting with that of the tank.	The tank is designed and constructed by a PowerBink Power Systems which provide compliant diesel tanks.	• The day tank shall be appropriately marked with the tank specific details.
5.2.3	Where there is a change of contents of a tank, the requirements of this Standard applicable to the new contents shall apply.	It is not expected that the type of fuel in the tank is changed.	No action required

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Clause	Requirement	Assessment	Recommendations
5.2.4	The following requirements apply to pipes and flexible hoses: a) Pipes and joints shall be constructed from a material that is resistant to attack by, and is compatible with, the liquid under all service conditions. Where pressure piping is used, it shall comply with AS 4041. b) All pipes shall be adequately protected from physical damage. Where plastic piping is used, it may also require electrostatic protection (refer to AS/NZS 1020 and IEC 60079-32-2). c) All above-ground pipes shall be colour-coded or labelled. d) Pipework shall be well-supported and protected from potential traffic damage. e) Flexible hoses shall not be used, except at transfer points. Where such hose is used, it shall be constructed of material that is resistant to attack by, and is compatible with, the liquid being transferred (diesel or petrol). The length of the hose shall be kept to a minimum.	a) Standard pipework is compatible with diesel. b) No plastic piping to be used. c) Recommendation made to label the pipework. d) Pipework is supported within the generator. e) n/a – piped directly from the storage tank.	• Any pipework intended to be connected to the tank shall be labelled to identify the contents as a combustible liquid.
5.3.1	The fill connection to a storage tank that is filled from a tank vehicle shall incorporate a liquid-tight connection unless the filling method employs a hand-held trigger nozzle with a non-latching feature. A cap or cover shall be provided for the fill point.	n/a - The tank is not filled from a tanker.	No action required.
5.3.2	The fill point for any tank intended to be filled from a tank vehicle shall comply with the following requirements: a) The fill point shall be readily accessible. b) The fill point shall be protected from accidental damage.	n/a – The tank is directly filled from the storage tank.	No action required.

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Clause	Requirement	Assessment	Recommendations
	c) The fill point for any tank containing a flammable liquid shall be in open air and no ignition sources shall be located within the hazardous area defined in accordance with AS/NZS 60079.10.1. d) Where practicable, the fill point for any tank containing a combustible liquid shall be outside. If it is inside, it shall be not more than 2 m from a building entrance useable by a tank vehicle, and shall not be in a boiler room, furnace room, or an elevated temperature area. e) The fill point for a tank shall be located so that a tank vehicle is not required to enter the tank compound to make a delivery. f) For any tank containing a flammable liquid, the location shall be such that the tanker can stand wholly off any public road, except where allowed under the ADG code. g) Each fill point shall be clearly identified. For petroleum products, fill points shall comply with AS 4977. h) The areas around the tank fill point and the vehicle hose connection point shall be impervious to the product. NOTE: Where a service station is located near sensitive facilities (including where vulnerable people are concentrated such as schools, hospitals, aged care accommodations, childcare and large entertainment venues), consideration should be given to preventing any potential large spill of fuel during a road tanker unloading operation impacting on these nearby sensitive facilities.		
5.3.3	It shall be possible to monitor or gauge the amount of liquid in any tank intended to receive a delivery. This gauge or monitor shall also show the normal fill level of the tank. The following shall apply:	The day tank is not filled like a typical tank; hence, this clause would not be appropriate.	No action required.

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Clause	Requirement	Assessment	Recommendations
	a) The normal fill level shall not exceed 95% of tank capacity (overfill level). b) The provision of only a dipstick without an alarm is acceptable for liquid level monitoring of tanks – (i) up to 25,000 L tank capacity for combustible liquids; (ii) up to 5,000 L tank capacity for flammable liquids; or (ii) underground tanks filled by gravity. c) All other tanks shall have a suitable high level alarm (LAH) set at a maximum of 97% of tank capacity. This alarm is the first stage overfilling protection, and shall be set to warn when the normal fill level has been exceeded. It shall not be used to control filling. d) Any tank filled by gravity shall be fitted with an automatic flow limiting device which reduces the flow rate into the tank by 98% when the normal fill level of the tank has been attained. e) A contents gauge or monitoring device together with a LAH, remote from the tank, shall be provided at the fill point, or where the tank filling operation is monitored and controlled (e.g. a control room), in the following circumstances: (i) where the tank is located within a building or under a building and the dip point is more than 8 m from the entrance to the building or otherwise inaccessible; (ii) where the tank is in a tank chamber and access to the dip point is prevented; (iii) where the tank is out of direct sight of the attendant monitoring filling flow controls; or (iv) where category 6 tanks are filled from ship to shore, form a refinery, or similar high volume transfers (100 m³/h). f) In addition to the LAH, they shall incorporate a physically and electrically independent high-high level alarm (LAHH). It will warn of a failure of some	a) n/a - Tanks is filled based on level requirements and fed from the storage tank. b) n/a – tank is filled from storage tank. c) n/a – tank is <25,000 L d) n/a – tank is not gravity fed. e) n/a – tank is not filled by an operator. f) n/a - tank is <25,000 L and thus this clause does not apply.	

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Clause	Requirement	Assessment	Recommendations
	element of a primary (process) control system. It shall be set at or below the tank rated capacity to allow adequate response time to terminate the transfer before loss of containment/damage occurs. NOTES: Response times should be based on maximum flow rates and generally should not be more than 10 minutes and be determined by a risk assessment. Any alarm system should be appropriately maintained with a safety testing regime.		
5.4.1	Each tank shall be fitted with a vent or vents in accordance with the following provisions: a) A free vent or a pressure-vacuum (PV) vent designed for the type of liquid being stored. b) An emergency vent when the conditions of Clause 5.5 apply. c) Vapours shall be safely discharged outdoors unless their recovery and treatment is otherwise required. d) The vents shall be separate from the filling pipe except for a Category 1 tank. e) API Std 2000 is the basis for the requirements of this Clause (5.4.1). Appendix H provides a metric version of parts of API Std 2000, but in cases of dispute the original Standard in imperial units will be the basis for decision.	a) Free vents are installed on the tank. b) An emergency vent has been installed in the tank. c) Vapours are discharged outdoors. d) The vents are separate from the filling pipe. e) This clause has been noted in this assessment.	No action required.
5.4.2	The size of any free vent or pressure-vacuum vent shall be such that pressure or vacuum resulting from filling, emptying, or atmospheric temperature change will not cause the maximum allowable stress for the tank to be exceeded, nor the tank to collapse. These requirements shall be met by one of the following: a) For a Category 1 or Category 2 tank, the vent provided with the tank in accordance with AS 1692	Vents provided on tank.	No action required.

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Clause	Requirement	Assessment	Recommendations
	shall be deemed to be suitable for the types of installations for which the tanks are intended (see Note 1 to Clause 5.4.1). b) The vent size for a Category 3, 4, 5, or 6 tank installed above-ground shall comply with the relevant requirements of API Std 2000. Note: The vent size of a Category 4 above-ground tank may be in accordance with Table 5.1. c) The vent size of a Category 4 tank installed underground shall be at least that specified in Table 5.2.		
5.4.4	The discharge point of a vent shall comply with the following requirements: a) The vent discharge point shall be located laterally at least 4 m for flammable liquids and 2 m for combustible liquids from any opening into a building, e.g., window, door, ventilator, air conditioner, or a mechanical vent intake to reduce the possibility of the entry of nuisance vapour. The vent shall be located such that the opening into a building shall be outside the hazardous area to AS/NZS 60079.10.1. b) The vent discharge point shall be located at least 4 m above ground level except for direct-vented tanks of Categories 1 or 2. NOTE: The vent for any above-ground tank may discharge at a point at least 150 mm above the top of the tank, provided that other requirements for tank and vent locations are met. c) Where the tank is to be filled by gravity flow from a tank vehicle, the vent discharge point for the tank shall be at least 4 m above ground level at the fill point and in all circumstances shall be higher than the tank vehicle.	a) The discharge points of the fuel tank are located by more than 2 m from the nearest opening into a building. b) The tank is vented >4 m above ground. c) As above. d) Tank is filled from storage tank.	No action required.

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Clause	Requirement	Assessment	Recommendations
	d) Where a Category 1 to 5 tank is to be filled by pumping from a tank vehicle – (i) the vent pipe or overfill point shall terminate in view of the filling operator; or (ii) the tank shall be fitted with a high level alarm audible to the filling operator.		
5.4.5	The discharge end of a vent shall be protected from the ingress of foreign material by means of a protective cage or fitting. Where a tank contains flammable liquid and the vapour within the ullage space of the tank is within explosive limits, a flame arrester of similar device shall be fitted. Any such protective cage, flame arrester or other means shall not reduce the required effective vent area or create undue back-pressure within the tank. NOTE: A flame arrester incorporating a bronze or stainless steel wire mesh having openings not greater than 600 µm is acceptable.	• Protection for the ingress of foreign materials has been installed in the discharge end of the vents. • No flammable liquid tank is present on-site.	No action required.
5.5.1	Emergency venting shall be provided for any Category 3 (above 2,500 L), 4, 5 or 6 above-ground tank having a fixed roof and containing a flammable liquid or which, though it contains a combustible liquid, is in the same compound as a tank containing a flammable liquid.	No flammable liquid tank is present on-site.	No action required.
5.5.2	The capacity of any emergency vent shall be in accordance with API Std 2000 (see Appendix H)	• The tank is fitted with vents.	No action required.
5.5.3	The pressure setting of any emergency vent shall be such that under maximum emergency venting conditions the pressure in the tank shall not exceed the limits given in the Standard to which the tank has been designed.	• Emergency vents are assumed to have been installed on the tank and have been designed in accordance with AS 1940:2017 based on the sale of a compliant tank from supplier.	No action required.
5.7 Table 5.3 Table 5.4	A tank or tanks shall be located so that the following minimum separation distances are maintained: a) To security fences and on-site protected places, Table 5.3.	• The minimum separation distance for the security fences and on-site protected places, is as follows: Requirement | Distance (m) Diesel (2.4 kL)	No action required.

Clause	Requirement	Assessment	Recommendations
	b) To a protected place beyond the site boundary, Table 5.4. c) Except where provided with cooling water in accordance with Appendix I, the layout of tanks storing flammable liquids (or combustible liquids within the same compound as flammable liquids) shall be such that any tank is accessible on at least two sides from an access road outside the bund. The vent discharge point shall be located at least 4 m above ground level except for direct-vented tanks of Categories 1 or 2. NOTE: The vent for any above-ground tank may discharge at a point at least 150 mm above the top of the tank, provided that other requirements for tank and vent locations are met.	Other fill points, platforms or package storage: 3 Office buildings, warehouses, amenities blocks, etc: 0 Security fences: 3 Offsite protected place: 0 • There are no other fill points in proximity to the tank. • There is no separation requirement from the tank to a building. • The tanks are located >3 m from security fences. • There is no separation requirement. • The tank compound only stores combustible liquids. • The switch room container is not considered a protected place; hence, it is not necessary to provide separation between the generator and the switch room from the perspective of AS 1940:2017.	
5.7.6	The following requirements apply to the storage of liquids in horizontal tanks: a) Horizontal tanks shall comply with AS 1692 and the requirements of this standard. b) The distance between horizontal tanks shall be at least 600 mm. c) Tanks shall not be arranged end-to-end unless the potential for end failure and the resulting exposure hazard has been taken into account when	a) The manufacturer has noted that the tank has been designed per AS 1692 and AS 1940 as well. b) n/a – day tank would be considered exempt from this requirement. c) Day tank is not stored end to end with storage tank.	No action required.

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Clause	Requirement	Assessment	Recommendations
	determining the tank's location. NOTE: Tanks may be arranged in parallel (side-by-side) in a row.		
5.8.1	Provision shall be made to contain any leakage or spillage from the tank storage facility and to prevent it from contaminating the surrounding soil or from entering any watercourse or water drainage system. Any above-ground tank shall be installed within a compound, except where the quantity of liquid stored is within that allowable as minor storage in Table 2.1, or where the tank has integral secondary containment complying with Clause 5.9.	• The tank is integrally bunded.	No action required.
5.8.2	The net capacity of a compound shall be at least 110% of the capacity of the largest tank or 25% of the total capacity of all tanks within the bund whichever is the greater. If two or more tanks are operated as a single unit, then the capacity of all such tanks shall be used when calculated the capacity of the compound.	• The tank is an integrally bunded tank which has the required containment.	No action required.
5.9.1	A tank complying with this Clause (5.9) shall be one of the following: a) A double-walled tank. b) A tank having secondary containment and an external, fire-rated covering. c) A tank with an attached or integrated spillage compound.	• The tank is double-walled.	No action required.
5.9.2	The following requirements apply to tanks with integral secondary containment: a) The tank shall not be used for the storage of PG I flammable liquids. b) The capacity of the tank shall not exceed – (i) 55,000 L for PG II liquids; (ii) 110,000 for PG III liquids; or (iii) 110,000 for combustible liquids. c) The primary (inner) tank shall be constructed to AS 1692 or equivalent Standard.	a) The tanks do not store PG I flammable liquids. b) The capacity of the tank does not exceed the threshold for combustible liquid 2.4 kL, diesel). c) The primary tank has been constructed to the relevant standard. d) The secondary tank has been designed and constructed to contain the entire capacity of	No action required.

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Clause	Requirement	Assessment	Recommendations
	d) The secondary containment shall be adequately designed and constructed, to contain the entire contents of the primary tank. e) Means shall be provided to establish and monitor the integrity of the primary tank. f) The tank shall be installed in accordance with Clause 5.11 or 5.12.6 as appropriate. g) Where flammable liquid or vapour could escape from the interstitial space of a tank, the tank shall be separated by at least 3 m from any ignition source, including vehicles being refuelled. h) Spacing between adjacent tanks shall be at least 600 mm. i) The tank shall be protected from damage caused by an impact. j) Means shall be provided to prevent release of liquid by siphon flow from the tank. k) The tank shall be fitted with a means of determining the level of its contents. Such means shall be available to the delivery operator. l) All piping connections to the tank shall be above the normal maximum fill level. m) Tanks shall not be manifolded unless provisions are made to prevent their being overfilled. n) Overfill protection shall be provided by a suitable alarm with the flow of liquid being stopped before the tank overflows. o) Each fill point shall be provided with spill containment having a minimum capacity of 15 L per fill point. Such a device shall be fitted to a tank in order to catch and contain any minor spill during product delivery to the tank.	the primary tank should in the event that failure occurs. e) Recommendation made to address this requirement. f) The tanks are installed in accordance with Clause 5.11. Clause 5.12.6 does not apply as the tanks are not located in near proximity to buildings. g) No flammable liquid tank is present on-site. h) n/a – day tank would be exempt from this. i) The tank is composed of steel which is a material that is resilient against impact damage. Furthermore, no vehicles will enter the tank compound. j) Processes has been provided to prevent the release of liquid by siphon flow. k) The tank has been designed and constructed in accordance with AS 1940:2017. l) Piping connections are installed above the normal fill level. m) Tanks are not a part of a manifold. n) n/a – tank volume does not require this. o) n/a - tank does not a fill point (i.e. connected to tanker). p) The tanks do not have multiple compartments. q) As assessed in Clause 5.4. r) Assumed the tank supplier has incorporated this to comply with AS 1940:2017. s) Assumed the tank supplier has incorporated this to comply with AS 1940:2017.	

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Clause	Requirement	Assessment	Recommendations
	p) Where a tank having multiple compartments is installed, the separation distance to protected places shall be based on the aggregate volume of the compartments and the lowest flash point of the liquid in any tank compartment. q) Venting shall comply with Clause 5.4. Venting of compartments of a multiple-compartment tank shall be based on the lowest flash point product in any of the compartments. r) Where the interstitial space is enclosed, it shall be provided with venting in accordance with this Standard or with a UL approved method. s) Means shall be provided to physically test the correct functioning of any internal valve without the need to remove the valve.		
5.9.3	The following requirements apply in addition to those in Clause 5.9.2 above: a) Primary and secondary containment shall be wholly constructed of steel and shall be designed in accordance with AS 1692 or equivalent Standard. b) Separation distances as given in Clause 5.7 shall apply.	a) Primary and secondary containment are constructed of steel and have been designed with the relevant standard. b) This has been noted in Clause 5.7 and 5.9.4(d).	No action required.
5.11.1	An above-ground storage tank shall rest on a foundation which is adequate to support, without unacceptable or uneven settling, the following loads and forces: a) The direct load imposed by the tank when full of either water or product, whichever is the more dense. b) Any possible overturning forces, and in particular those due to wind when the tank is empty.	Tank is located as part of a containerised generator which is considered to provide the necessary protection.	No action required.

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Clause	Requirement	Assessment	Recommendations
	c) Any uplift or other distorting forces such as may occur in a tank under pressure.		
11.12.4	Where Class C1 liquid is stored without flammable liquid but with or without Class C2 liquid, the installation shall be provided with: a) A single powder-type extinguishers. b) 10 L/s of hydrant flow.	The site has a hydrant system installed that provides >10 L/s of hydrant flow. It is unclear whether extinguishers have been allocated to the tank storage area.	Notwithstanding this, a recommendation has been put forward: • One (1) powder type-extinguishers shall be provided at the generator.

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3.3 Storage Tank AS 1940 Review

A clause-by-clause assessment of the storage tank against AS 1940:2017 is provided in **Table 3-3**. A summary of the recommendations made from the assessment are provided below.

- The storage tank shall be appropriately marked with the tank specific details.
- Any pipework intended to be connected to the tank shall be labelled to identify the contents as a combustible liquid.
- Flexible pipework shall not be used except for as a transfer hose between refuelling vehicle and the tank.
- A contents gauge or monitoring device along with a high level alarm shall be installed on the diesel tank.
- The diesel tank shall have a vent pipe that discharges at 4 m above ground.
- The vent pipe shall discharge in view of the fill point.
- A spill kit shall be provided in the vicinity of the storage tank.
- One (1) powder type-extinguishers shall be provided at the storage tank.

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Table 3-3: Diesel Tank AS 1940:2017 Compliance Assessment

Clause	Requirement	Assessment	Recommendations
5.2.1	A static storage tank shall be designed and constructed to comply with AS 1692 or an equivalent Standard for the category of tank appropriate to the application. A Category 1 tank shall not be used for flammable liquid.	The tank used for the storage of diesel has been designed in accordance with the appropriate standard (AS 1692 and AS1940) as detailed in the manufacturer's specification sheet. No flammable liquid is stored on-site.	No action required.
5.2.2	For above-ground tanks: i. Markings shall be displayed on the outside walls of the tanks and shall not be less than 500 mm in height for tanks having a diameter of 6 m or greater. For tanks of less than 6 m diameter the markings shall be not less than 150 mm in height. ii. The bottom of markings shall be above the crest of the main bund and any plant, equipment and piping on or above the bund. iii. Where possible, the markings shall be clearly visible from main alternative access points likely to be used by the fire authority. iv. Where there is a foam pumphouse or manifold for the control of firefighting foam, one such marking shall be clearly visible from that point or its close proximity. v. Where there is a cluster of vertical tanks of 6 m diameter or greater or tanks are not separated as given in Table 5.3, the tanks shall have similar markings affixed to the roof with the numerals of 6 and 9 underbarred. vi. All markings shall be of a colour contrasting with that of the tank.	The tank is designed and constructed by a PowerBink Power Systems which provide compliant diesel tanks.	• The storage tank shall be appropriately marked with the tank specific details.

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Clause	Requirement	Assessment	Recommendations
5.2.3	Where there is a change of contents of a tank, the requirements of this Standard applicable to the new contents shall apply.	It is not expected that the type of fuel in the tank is changed.	No action required
5.2.4	The following requirements apply to pipes and flexible hoses: a) Pipes and joints shall be constructed from a material that is resistant to attack by, and is compatible with, the liquid under all service conditions. Where pressure piping is used, it shall comply with AS 4041. b) All pipes shall be adequately protected from physical damage. Where plastic piping is used, it may also require electrostatic protection (refer to AS/NZS 1020 and IEC 60079-32-2). c) All above-ground pipes shall be colour-coded or labelled. d) Pipework shall be well-supported and protected from potential traffic damage. e) Flexible hoses shall not be used, except at transfer points. Where such hose is used, it shall be constructed of material that is resistant to attack by, and is compatible with, the liquid being transferred (diesel or petrol). The length of the hose shall be kept to a minimum.	a) Standard pipework is compatible with diesel. b) All pipework is protected in confines of the system. c) Recommendation made to label the pipework. d) Pipework is supported inside of the unit. e) Recommendation made to avoid flexible hoses.	• Any pipework intended to be connected to the tank shall be labelled to identify the contents as a combustible liquid. • Flexible pipework shall not be used except for as a transfer hose between refuelling vehicle and the tank.
5.3.1	The fill connection to a storage tank that is filled from a tank vehicle shall incorporate a liquid-tight connection unless the filling method employs a hand-held trigger nozzle with a non-latching feature. A cap or cover shall be provided for the fill point.	Liquid tight connection included as part of tank design.	No action is required.
5.3.2	The fill point for any tank intended to be filled from a tank vehicle shall comply with the following requirements:	Tank directly filled.	No action required.

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Clause	Requirement	Assessment	Recommendations
	a) The fill point shall be readily accessible. b) The fill point shall be protected from accidental damage. c) The fill point for any tank containing a flammable liquid shall be in open air and no ignition sources shall be located within the hazardous area defined in accordance with AS/NZS 60079.10.1. d) Where practicable, the fill point for any tank containing a combustible liquid shall be outside. If it is inside, it shall be not more than 2 m from a building entrance useable by a tank vehicle, and shall not be in a boiler room, furnace room, or an elevated temperature area. e) The fill point for a tank shall be located so that a tank vehicle is not required to enter the tank compound to make a delivery. f) For any tank containing a flammable liquid, the location shall be such that the tanker can stand wholly off any public road, except where allowed under the ADG code. g) Each fill point shall be clearly identified. For petroleum products, fill points shall comply with AS 4977. h) The areas around the tank fill point and the vehicle hose connection point shall be impervious to the product. NOTE: Where a service station is located near sensitive facilities (including where vulnerable people are concentrated such as schools, hospitals, aged care accommodations, childcare and large entertainment venues), consideration should be given to preventing any potential large spill of fuel during a		

Clause	Requirement	Assessment	Recommendations
	road tanker unloading operation impacting on these nearby sensitive facilities.		
5.3.3	It shall be possible to monitor or gauge the amount of liquid in any tank intended to receive a delivery. This gauge or monitor shall also show the normal fill level of the tank. The following shall apply: a) The normal fill level shall not exceed 95% of tank capacity (overfill level). b) The provision of only a dipstick without an alarm is acceptable for liquid level monitoring of tanks – (i) up to 25,000 L tank capacity for combustible liquids; (ii) up to 5,000 L tank capacity for flammable liquids; or (ii) underground tanks filled by gravity. c) All other tanks shall have a suitable high level alarm (LAH) set at a maximum of 97% of tank capacity. This alarm is the first stage overfilling protection, and shall be set to warn when the normal fill level has been exceeded. It shall not be used to control filling. d) Any tank filled by gravity shall be fitted with an automatic flow limiting device which reduces the flow rate into the tank by 98% when the normal fill level of the tank has been attained. e) A contents gauge or monitoring device together with a LAH, remote from the tank, shall be provided at the fill point, or where the tank filling operation is monitored and controlled (e.g. a control room), in the following circumstances: (i) where the tank is located within a building or under a building and the dip point is more than 8 m from the entrance to the building or otherwise inaccessible; (ii) where the tank is in a tank chamber and access to the dip point is prevented;	a) Tanks are only filled to, or below 95% of capacity at all times. b) Dipsticks level detection is appropriate for this tank size. c) n/a – tank is <25,000 L d) n/a – tank is not gravity fed. e) Recommendation made to ensure the requirement is captured. f) n/a - tank is <25,000 L and thus this clause does not apply.	• A contents gauge or monitoring device along with a high level alarm shall be installed on the diesel tank.

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Clause	Requirement	Assessment	Recommendations
	(iii) where the tank is out of direct sight of the attendant monitoring filling flow controls; or (iv) where category 6 tanks are filled from ship to shore, form a refinery, or similar high volume transfers (100 m³/h). f) In addition to the LAH, they shall incorporate a physically and electrically independent high-high level alarm (LAHH). It will warn of a failure of some element of a primary (process) control system. It shall be set at or below the tank rated capacity to allow adequate response time to terminate the transfer before loss of containment/damage occurs. NOTES: Response times should be based on maximum flow rates and generally should not be more than 10 minutes and be determined by a risk assessment. Any alarm system should be appropriately maintained with a safety testing regime.		
5.4.1	Each tank shall be fitted with a vent or vents in accordance with the following provisions: a) A free vent or a pressure-vacuum (PV) vent designed for the type of liquid being stored. b) An emergency vent when the conditions of Clause 5.5 apply. c) Vapours shall be safely discharged outdoors unless their recovery and treatment is otherwise required. d) The vents shall be separate from the filling pipe except for a Category 1 tank. e) API Std 2000 is the basis for the requirements of this Clause (5.4.1). Appendix H provides a metric version of parts of API Std 2000, but in cases of	a) Free vents are installed on the tank. b) An emergency vent has been installed in the tank. c) Vapours are discharged outdoors. d) The vents are separate from the filling pipe. e) This clause has been noted in this assessment.	No action required.

Clause	Requirement	Assessment	Recommendations
	dispute the original Standard in imperial units will be the basis for decision.		
5.4.2	The size of any free vent or pressure-vacuum vent shall be such that pressure or vacuum resulting from filling, emptying, or atmospheric temperature change will not cause the maximum allowable stress for the tank to be exceeded, nor the tank to collapse. These requirements shall be met by one of the following: a) For a Category 1 or Category 2 tank, the vent provided with the tank in accordance with AS 1692 shall be deemed to be suitable for the types of installations for which the tanks are intended (see Note 1 to Clause 5.4.1). b) The vent size for a Category 3, 4, 5, or 6 tank installed above-ground shall comply with the relevant requirements of API Std 2000. Note: The vent size of a Category 4 above-ground tank may be in accordance with Table 5.1. c) The vent size of a Category 4 tank installed underground shall be at least that specified in Table 5.2.	Vents provided on tank.	No action required.
5.4.4	The discharge point of a vent shall comply with the following requirements: a) The vent discharge point shall be located laterally at least 4 m for flammable liquids and 2 m for combustible liquids from any opening into a building, e.g., window, door, ventilator, air conditioner, or a mechanical vent intake to reduce the possibility of the entry of nuisance vapour. The vent shall be located such that the opening into a building shall be outside the hazardous area to AS/NZS 60079.10.1.	a) The discharge points of the fuel tank are located by more than 2 m from the nearest opening into a building. b) Recommendation made to ensure venting is >4 m above ground. c) As above. d) Recommendation made to ensure the requirement is captured.	• The diesel tank shall have a vent pipe that discharges at 4 m above ground. • The vent pipe shall discharge in view of the fill point.

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Clause	Requirement	Assessment	Recommendations
	b) The vent discharge point shall be located at least 4 m above ground level except for direct-vented tanks of Categories 1 or 2. NOTE: The vent for any above-ground tank may discharge at a point at least 150 mm above the top of the tank, provided that other requirements for tank and vent locations are met. c) Where the tank is to be filled by gravity flow from a tank vehicle, the vent discharge point for the tank shall be at least 4 m above ground level at the fill point and in all circumstances shall be higher than the tank vehicle. d) Where a Category 1 to 5 tank is to be filled by pumping from a tank vehicle – (i) the vent pipe or overfill point shall terminate in view of the filling operator; or (ii) the tank shall be fitted with a high level alarm audible to the filling operator.		
5.4.5	The discharge end of a vent shall be protected from the ingress of foreign material by means of a protective cage or fitting. Where a tank contains flammable liquid and the vapour within the ullage space of the tank is within explosive limits, a flame arrester of similar device shall be fitted. Any such protective cage, flame arrester or other means shall not reduce the required effective vent area or create undue back-pressure within the tank. NOTE: A flame arrester incorporating a bronze or stainless steel wire mesh having openings not greater than 600 µm is acceptable.	• Protection for the ingress of foreign materials has been installed in the discharge end of the vents. • No flammable liquid tank is present on-site.	No action required.
5.5.1	Emergency venting shall be provided for any Category 3 (above 2,500 L), 4, 5 or 6 above-ground tank having a fixed roof and containing a flammable liquid or which, though it contains a combustible liquid, is in the same compound as a tank containing a flammable liquid.	• No flammable liquid tank is present on-site.	No action required.

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Clause	Requirement	Assessment	Recommendations
5.5.2	The capacity of any emergency vent shall be in accordance with API Std 2000 (see Appendix H)	• The tank is fitted with vents.	No action required.
5.5.3	The pressure setting of any emergency vent shall be such that under maximum emergency venting conditions the pressure in the tank shall not exceed the limits given in the Standard to which the tank has been designed.	• Emergency vents are assumed to have been installed on the tank and have been designed in accordance with AS 1940:2017 based on the sale of a compliant tank from supplier.	No action required.
5.7 Table 5.3 Table 5.4	A tank or tanks shall be located so that the following minimum separation distances are maintained: a) To security fences and on-site protected places, Table 5.3. b) To a protected place beyond the site boundary, Table 5.4. c) Except where provided with cooling water in accordance with Appendix I, the layout of tanks storing flammable liquids (or combustible liquids within the same compound as flammable liquids) shall be such that any tank is accessible on at least two sides from an access road outside the bund. The vent discharge point shall be located at at least 4 m above ground level except for direct-vented tanks of Categories 1 or 2. NOTE: The vent for any above-ground tank may discharge at a point at least 150 mm above the top of the tank, provided that other requirements for tank and vent locations are met.	• The minimum separation distance for the security fences and on-site protected places, is as follows: Diesel (7 kL) Other fill points, platforms or package storage: 3 Office buildings, warehouses, amenities blocks, etc: 1.6 Security fences: 3 Offsite protected place: 1.6 • There are no other fill points in proximity to the tank. • There is no separation requirement from the tank to a building. • The tanks are located >3 m from security fences. • No protected places within 1.6 m of the tank.	No action required.

Clause	Requirement	Assessment	Recommendations
		• The tank compound only stores combustible liquids. • The switch room container is not considered a protected place; hence, it is not necessary to provide separation between the generator and the switch room from the perspective of AS 1940:2017.	
5.7.6	The following requirements apply to the storage of liquids in horizontal tanks: a) Horizontal tanks shall comply with AS 1692 and the requirements of this standard. b) The distance between horizontal tanks shall be at least 600 mm. c) Tanks shall not be arranged end-to-end unless the potential for end failure and the resulting exposure hazard has been taken into account when determining the tank's location. NOTE: Tanks may be arranged in parallel (side-by-side) in a row.	a) The tank will comply with the requirements of this Standard once the recommendations has been followed. The manufacturer has noted that the tank has been designed per AS 1692 and AS 1940 as well. b) Day tank does not count as a separate tank requiring separation as it is integral to the generator. c) Day tank does not count as a separate tank requiring separation as it is integral to the generator.	No action required.
5.8.1	Provision shall be made to contain any leakage or spillage from the tank storage facility and to prevent it from contaminating the surrounding soil or from entering any watercourse or water drainage system. Any above-ground tank shall be installed within a compound, except where the quantity of liquid stored is within that allowable as minor storage in Table 2.1, or where the tank has integral secondary containment complying with Clause 5.9.	• The tank is integrally bunded.	No action required.
5.8.2	The net capacity of a compound shall be at least 110% of the capacity of the largest tank or 25% of the total capacity of all tanks within the bund whichever is the greater. If two or more tanks are operated as a single	• The tank is an integrally bunded tank which has the required containment.	No action required.

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Clause	Requirement	Assessment	Recommendations
	unit, then the capacity of all such tanks shall be used when calculated the capacity of the compound.		
5.9.1	A tank complying with this Clause (5.9) shall be one of the following: a) A double-walled tank. b) A tank having secondary containment and an external, fire-rated covering. c) A tank with an attached or integrated spillage compound.	• The tank is double-walled.	No action required.
5.9.2	The following requirements apply to tanks with integral secondary containment: a) The tank shall not be used for the storage of PG I flammable liquids. b) The capacity of the tank shall not exceed – (i) 55,000 L for PG II liquids; (ii) 110,000 for PG III liquids; or (iii) 110,000 for combustible liquids. c) The primary (inner) tank shall be constructed to AS 1692 or equivalent Standard. d) The secondary containment shall be adequately designed and constructed, to contain the entire contents of the primary tank. e) Means shall be provided to establish and monitor the integrity of the primary tank. f) The tank shall be installed in accordance with Clause 5.11 or 5.12.6 as appropriate. g) Where flammable liquid or vapour could escape from the interstitial space of a tank, the tank shall be separated by at least 3 m from any ignition source, including vehicles being refuelled. h) Spacing between adjacent tanks shall be at least 600 mm.	a) The tanks do not store PG I flammable liquids. b) The capacity of the tank does not exceed the threshold for combustible liquid 7 kL, diesel). c) The primary tank has been constructed to the relevant standard. d) The secondary tank has been designed and constructed to contain the entire capacity of the primary tank should in the event that failure occurs. e) Recommendation made to address this requirement. f) The tanks are installed in accordance with Clause 5.11. Clause 5.12.6 does not apply as the tanks are not located in near proximity to buildings. g) No flammable liquid tank is present on-site. h) Day tank does not count as a separate tank requiring separation as it is integral to the generator.	Notwithstanding this, a recommendation has been put forward: • A spill kit shall be provided in the vicinity of the storage tank.

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Clause	Requirement	Assessment	Recommendations
	i) The tank shall be protected from damage caused by an impact. j) Means shall be provided to prevent release of liquid by siphon flow from the tank. k) The tank shall be fitted with a means of determining the level of its contents. Such means shall be available to the delivery operator. l) All piping connections to the tank shall be above the normal maximum fill level. m) Tanks shall not be manifolded unless provisions are made to prevent their being overfilled. n) Overfill protection shall be provided by a suitable alarm with the flow of liquid being stopped before the tank overflows. o) Each fill point shall be provided with spill containment having a minimum capacity of 15 L per fill point. Such a device shall be fitted to a tank in order to catch and contain any minor spill during product delivery to the tank. p) Where a tank having multiple compartments is installed, the separation distance to protected places shall be based on the aggregate volume of the compartments and the lowest flash point of the liquid in any tank compartment. q) Venting shall comply with Clause 5.4. Venting of compartments of a multiple-compartment tank shall be based on the lowest flash point product in any of the compartments. r) Where the interstitial space is enclosed, it shall be provided with venting in accordance with this Standard or with a UL approved method.	i) The tank is composed of steel which is a material that is resilient against impact damage. Furthermore, no vehicles will enter the tank compound. j) Processes have been provided to prevent the release of liquid by siphon flow. k) The tank has been designed and constructed in accordance with AS 1940:2017. l) Piping connections are installed above the normal fill level. m) Tanks are not a part of a manifold. n) n/a – tank volume does not require this. o) Fill points are not fitted with a device capable of holding more than 15 L of spill although filling is not expected to be required. Although this can be addressed by recommended spill kits. p) The tanks do not have multiple compartments. q) As assessed in Clause 5.4. r) Assumed the tank supplier has incorporated this to comply with AS 1940:2017. s) Assumed the tank supplier has incorporated this to comply with AS 1940:2017.	

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Clause	Requirement	Assessment	Recommendations
	s) Means shall be provided to physically test the correct functioning of any internal valve without the need to remove the valve.		
5.9.3	The following requirements apply in addition to those in Clause 5.9.2 above: a) Primary and secondary containment shall be wholly constructed of steel and shall be designed in accordance with AS 1692 or equivalent Standard. b) Separation distances as given in Clause 5.7 shall apply.	a) Primary and secondary containment are constructed of steel and have been designed with the relevant standard. b) This has been noted in Clause 5.7 and 5.9.4(d).	No action required.
5.11.1	An above-ground storage tank shall rest on a foundation which is adequate to support, without unacceptable or uneven settling, the following loads and forces: a) The direct load imposed by the tank when full of either water or product, whichever is the more dense. b) Any possible overturning forces, and in particular those due to wind when the tank is empty. c) Any uplift or other distorting forces such as may occur in a tank under pressure.	Tank located on hardstand which is adequate.	No action required.
11.12.4	Where Class C1 liquid is stored without flammable liquid but with or without Class C2 liquid, the installation shall be provided with: a) A single powder-type extinguishers. b) 10 L/s of hydrant flow.	The site has a hydrant system installed that provides >10 L/s of hydrant flow. It is unclear whether extinguishers have been allocated to the tank storage area.	Notwithstanding this, a recommendation has been put forward: • One (1) powder type-extinguishers shall be provided at the storage tank.

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4.0 Conclusion and Recommendations

4.1 Conclusion

An assessment of the diesel tanks provided as part of the generator fuel supply (storage tank and day tank) was conducted to determine whether the storage would comply with AS 1940:2017. The report was developed to assist the project team in designing the DG storage with the aim of minimising the risk as required by the WHS. It is concluded that if the advice documented in this report is followed, the area will comply with the standard and thus the WHS regulation.

In addition, the switch room container is not considered a protected place (i.e. a place where people may congregate) under AS 1940:2017; hence, there are no specific separation requirements for the generator to the switch room. Therefore, it is considered acceptable to locate the generate containerised unit above the switch room unit.

4.2 Recommendations

The following recommendations have been made for the facility:

Day Tank

- The day tank shall be appropriately marked with the tank specific details.
- Any pipework intended to be connected to the tank shall be labelled to identify the contents as a combustible liquid.
- One (1) powder type-extinguishers shall be provided at the generator.

Storage Tank

- The storage tank shall be appropriately marked with the tank specific details.
- Any pipework intended to be connected to the tank shall be labelled to identify the contents as a combustible liquid.
- Flexible pipework shall not be used except for as a transfer hose between refuelling vehicle and the tank.
- A contents gauge or monitoring device along with a high level alarm shall be installed on the diesel tank.
- The diesel tank shall have a vent pipe that discharges at 4 m above ground.
- The vent pipe shall discharge in view of the fill point.
- A spill kit shall be provided in the vicinity of the storage tank.
- One (1) powder type-extinguishers shall be provided at the storage tank.

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Riskcon Engineering Pty Ltd
ABN 74 626 753 820

Renton Parker
Managing Director – Risk Engineering
Riskcon Engineering Pty Ltd
+61 438 749 181
www.Riskcon-eng.com

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5.0 References

[1] WorkSafe Tasmania, "Work Health and Safety Regulation 2022," WorkSafe Tasmania, 2022.

[2] Standards Australia, AS 1940:2017 - Storage and Handling of Flammable and Combustible Liquids, Sydney: Standards Australia, 2017.

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Appendix A
Site Layout

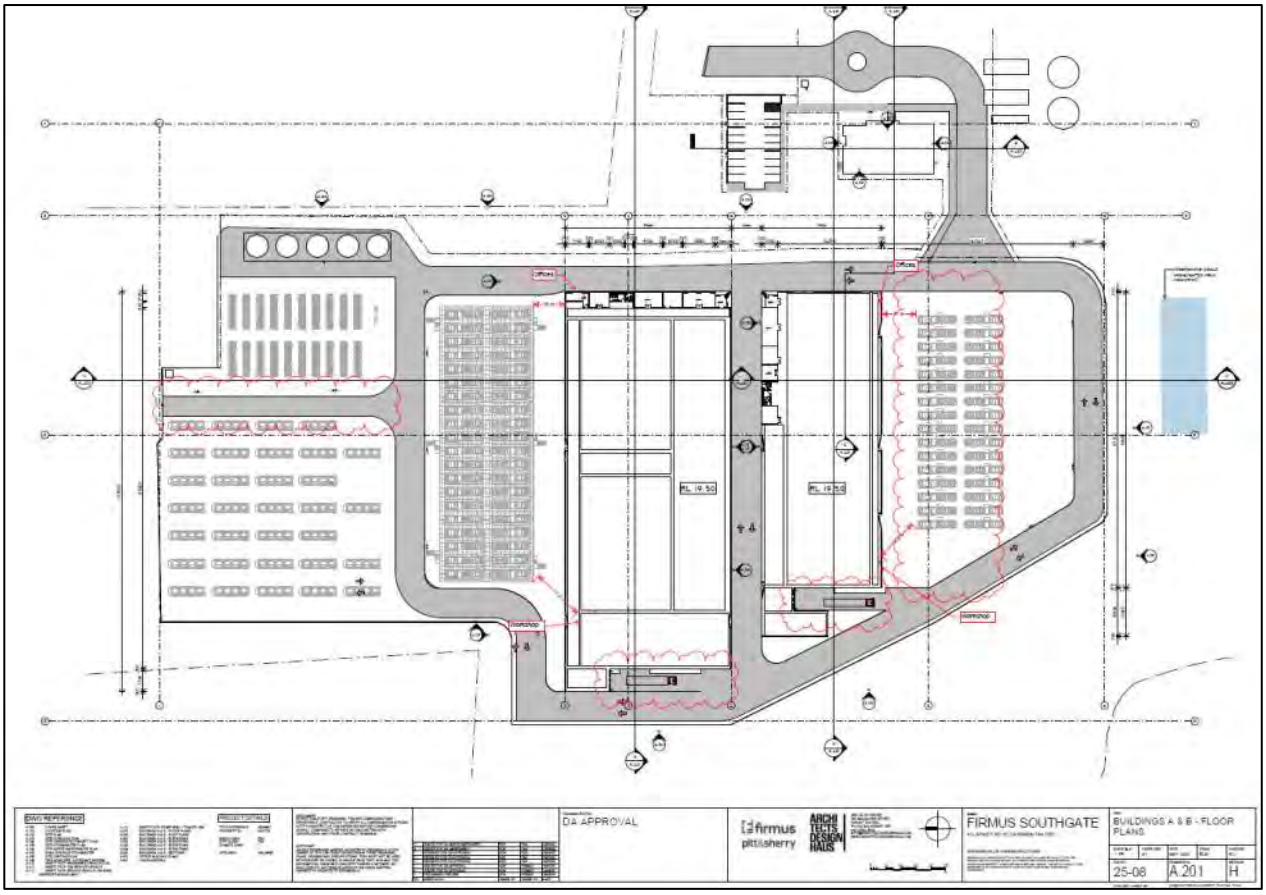
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Plant Layout with separation distances between diesel tanks and on-site protected places

Attachment C

pitt&sherry

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APPENDIX 4. PLANNING CERTIFICATE

BUSHFIRE-PRONE AREAS CODE

CERTIFICATE[15] UNDER S51(2)(d) *LAND USE PLANNING AND APPROVALS ACT 1993*

1. Land to which certificate applies

The subject site includes property that is proposed for use and development and includes all properties upon which works are proposed for bushfire protection purposes.

Street address:	226 MILL RD WESLEY VALE TAS 7307
Certificate of Title / PID:	187534/1, 6524040 and 187534/3

2. Proposed Use or Development

Description of proposed Use and Development:	Proposed AI Data Centre
Applicable Planning Scheme:	Tasmanian Planning Scheme

3. Documents relied upon

This certificate relates to the following documents:

Title	Author	Date	Version
Proposed site plan – drawing number 04	HDR Pty Limited	10/06/2026	Issue A
Dangerous goods assessment	Pitt and Sherry	22/07/2026	ref: T-P.24.1314-00-IND-MEM-002-Rev01.docx/SB/ac

[15] This document is the approved form of certification for this purpose and must not be altered from its original form.

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4. Nature of Certificate

The following requirements are applicable to the proposed use and development:

☐	**E1.4 / C13.4 – Use or development exempt from this Code**	
	Compliance test	**Compliance Requirement**
☐	E1.4(a) / C13.4.1(a)	Insufficient increase in risk

☐	**E1.5.1 / C13.5.1 – Vulnerable Uses**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.5.1 P1 / C13.5.1 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.5.1 A2 / C13.5.1 A2	Emergency management strategy
☐	E1.5.1 A3 / C13.5.1 A2	Bushfire hazard management plan

☒	**E1.5.2 / C13.5.2 – Hazardous Uses**	
	Acceptable Solution	**Compliance Requirement**
☒	E1.5.2 P1 / C13.5.2 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☒	E1.5.2 A2 / C13.5.2 A2	Emergency management strategy
☒	E1.5.2 A3 / C13.5.2 A3	Bushfire hazard management plan

☐	**E1.6.1 / C13.6.1 Subdivision: Provision of hazard management areas**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.1 P1 / C13.6.1 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.6.1 A1 (a) / C13.6.1 A1(a)	Insufficient increase in risk

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☐	E1.6.1 A1 (b) / C13.6.1 A1(b)	Provides BAL-19 for all lots (including any lot designated as 'balance')
☐	E1.6.1 A1(c) / C13.6.1 A1(c)	Consent for Part 5 Agreement

☐	**E1.6.2 / C13.6.2 Subdivision: Public and fire fighting access**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.2 P1 / C13.6.2 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.6.2 A1 (a) / C13.6.2 A1 (a)	Insufficient increase in risk
☐	E1.6.2 A1 (b) / C13.6.2 A1 (b)	Access complies with relevant Tables

☐	**E1.6.3 / C13.1.6.3 Subdivision: Provision of water supply for fire fighting purposes**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.3 A1 (a) / C13.6.3 A1 (a)	Insufficient increase in risk
☐	E1.6.3 A1 (b) / C13.6.3 A1 (b)	Reticulated water supply complies with relevant Table
☐	E1.6.3 A1 (c) / C13.6.3 A1 (c)	Water supply consistent with the objective
☐	E1.6.3 A2 (a) / C13.6.3 A2 (a)	Insufficient increase in risk
☐	E1.6.3 A2 (b) / C13.6.3 A2 (b)	Static water supply complies with relevant Table
☐	E1.6.3 A2 (c) / C13.6.3 A2 (c)	Static water supply consistent with the objective

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5. Bushfire Hazard Practitioner

Name:	Cameron Geeves	**Phone No:**	6231 9788
Postal Address:	313 Macquarie Street, South Hobart	**Email Address:**	cgeeves@northbarker.com.au
Accreditation No:	BFP – 178	**Scope:**	1, 2, 3A, 3B, 3C

6. Certification

I certify that in accordance with the authority given under Part 4A of the *Fire Service Act 1979* that the proposed use and development:

☐ Is exempt from the requirement Bushfire-Prone Areas Code because, having regard to the objective of all applicable standards in the Code, there is considered to be an insufficient increase in risk to the use or development from bushfire to warrant any specific bushfire protection measures, or

☒ The Bushfire Hazard Management Plan/s identified in Section 3 of this certificate is/are in accordance with the Chief Officer's requirements and compliant with the relevant **Acceptable Solutions** identified in Section 4 of this Certificate.

Signed:

certifier

Cameron Geeves

Name: Cameron Geeves **Date:** 18/08/2026

Certificate Number: PAS172

(for Practitioner Use only)

Emergency Management Strategy

Appendix H

pitt&sherry

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Tasmania Fire Service
Endorsed
19 / 08 / 2026

northbarker
ECOSYSTEM SERVICES

Proposed AI Data Centre

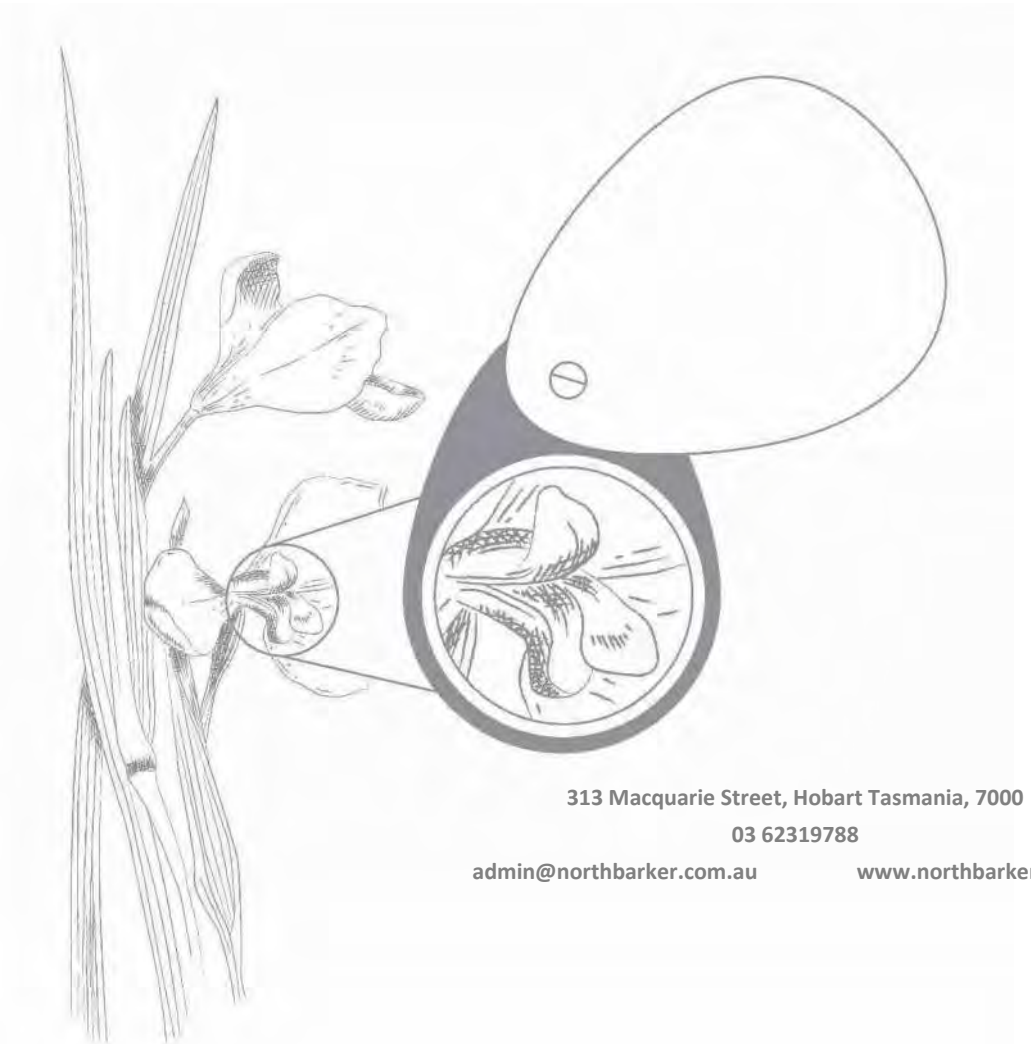
226 Mill Road, Wesley vale

Emergency Management Strategy

August 2026

For Pitt and Sherry (obo Firmus Technologies Pty Ltd)

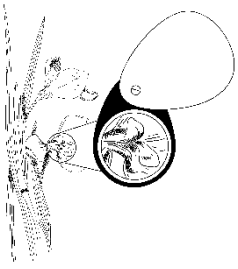
PAS172



313 Macquarie Street, Hobart Tasmania, 7000
03 62319788
admin@northbarker.com.au www.northbarker.com.au

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File Control			
Version	**Date**	**Author & Position**	**Comment**
v0.1	11/06/2026	Cameron Geeves – Lead Ecologist and Bushfire Practitioner (BSc Hons, BFP-178)	draft to Pitt and Sherry and Tasmania Fire Service
v0.2	09/07/2026	Cameron Geeves – Lead Ecologist and Bushfire Practitioner (BSc Hons, BFP-178)	Delivered to Pitt and Sherry and Tasmania Fire Service for endorsement
v1.0	18/08/2026	Cameron Geeves – Lead Ecologist and Bushfire Practitioner (BSc Hons, BFP-178)	Minor referencing update



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1 PURPOSE, SCOPE AND APPLICATION

This Emergency Management Strategy (EMS) relates to the proposed development of a utility-scale AI and data processing facility by Firmus Technologies Pty. Ltd. (herein Firmus) at 226 Mill Road, Wesley Vale, within the established Mill Park industrial precinct.

An endorsed EMS is required for compliance with Bushfire-prone Areas Code clause *C13.5.2 A2* of the Tasmanian Planning Scheme.

Emergency planning is a key risk mitigation for Hazardous Uses. Early consideration of emergency planning is required to ensure that a workable outcome is likely to be achievable.

This EMS has been prepared to demonstrate how risk to occupants will be managed to a tolerable level through site-specific emergency planning responses. It has been prepared in accordance with the TFS Bushfire Emergency Planning Guideline[1] and should be used to inform the development of a bushfire emergency plan.

2 OVERVIEW OF PROPOSAL

The proposed development is a utility-scale AI and data processing facility within the established Mill Park industrial precinct. It will provide large-scale data processing, storage and transmission, operating continuously with secure access and high reliability.

Operations will run 24/7, with activities largely contained indoors, including monitoring systems, maintenance and security. Around 10 staff are expected onsite during the day, with approximately 4 staff during evening and night shifts.

The development comprises a purpose-built data hall building and associated security facilities, together with UPS diesel generators, cooling and other supporting infrastructure, internal access roads, parking and hardstand areas. The facility will be serviced by dedicated firefighting infrastructure and will incorporate the bushfire protection measures prescribed by the associated Bushfire Hazard Management Plan.

The development is located within the established Mill Park industrial area, with the site layout making use of previously modified land while providing the separation from surrounding bushfire-prone vegetation required by the Bushfire Hazard Management Plan.

[1] Bushfire Risk Unit (2025)

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3 RELEVANT DETAILS

Section 4.2.2 (2) of the Tasmania Fire Service (TFS) Bushfire Emergency Planning Guideline[2] lists relevant details to be considered. Each item is addressed sequentially in Table 1 below.

Table 1. Relevant details of the proposal for consideration

Element	Consideration	Detail
A	Occupancy characteristics (e.g., number of occupants, age profile, disability, mobility and health considerations, communication constraints).	The facility will operate continuously – 24 hrs / 7 days a week. Up to 10 staff will be employed during a day shift and 4 staff during the two evening / night shifts. The staff may include a range of age profiles, disabilities, mobility and health considerations. The role of staff on site will be to support operational monitoring maintenance, security and emergency response readiness. Core onsite activities will include the continuous operation of data halls containing high-density computing equipment, real-time monitoring of electrical and mechanical systems, and management of cooling infrastructure designed to dissipate significant heat loads generated by computing operations.
B	Emergency management structure and capability (e.g., characteristics and capacity of the Emergency Control Organisation (ECO), response and intervention teams).	An Emergency Control Organisation (ECO) will be established in accordance with relevant Australian Standards, comprising designated Chief Wardens, Area Wardens and trained personnel across all shifts. Staff will receive site-specific emergency response training, including evacuation procedures, fire response and coordination with emergency services.
C	The building(s) and/or site vulnerability (e.g. construction, design, access, firefighting water supply, proximity to hazard, landscaping).	The development will comprise purpose-built industrial structures designed to contemporary construction standards, incorporating non-combustible materials where practicable. The site will be subject to a BAL 12.5 Bushfire Hazard Management Plan, including defendable space, managed landscaping and separation from surrounding vegetation. Firefighting water supply will be provided via dedicated static water tanks, pumps and booster systems forming a reticulated firefighting system. The site layout will incorporate all-weather access suitable for emergency vehicles, including full perimeter access and turning areas. External plant (e.g. generators, chillers) will be considered in terms of radiant heat exposure, ignition risk and defendability. Building construction will be determined by the applicable BAL rating for each specific building but must meet the minimum of BAL 12.5. The BAL 12.5 separation distances have been calculated using a conservative FDI 80 design scenario.

[2] Bushfire Risk Unit (2025)

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Element	Consideration	Detail
		The Bushfire Hazard Management Plan[3] demonstrates that this can reduce exposure of the proposed buildings to an acceptable level – being BAL 12.5.
D	Complementary bushfire protection strategies proposed or existing (e.g. alert systems, suppression systems, training, hazard management).	Training on site-specific emergency procedures must be provided on an annual basis to all staff. This training must also apply to all new staff members as a part of their site induction. Training must be in accordance with AS 3745: 2010 *Planning for emergencies in facilities.*
E	Possible bushfire scenarios.	**Potential bushfire scenarios** Possible bushfire scenarios include the approach of a bushfire from surrounding classified vegetation under a range of weather conditions and Fire Danger Ratings, including extreme or catastrophic fire weather conditions. Under these conditions, the site could be exposed to ember attack, radiant heat and potential direct flame contact at the site perimeter. **1. Landscape bushfire scenario** A large landscape fire could approach the facility from classified vegetation under elevated, extreme or catastrophic fire weather conditions. The most significant potential fire runs are associated with grassland from the west, southwest or south. Shorter fire runs (c. 100 m) from a grassland fire into relatively small patches of forest vegetation (pine plantation within the Mill Park precinct) mapped to the north, east and southeast could also possibly occur. **2. Local ignition scenario** Bushfire could also occur under lower Fire Danger Ratings where there is a local ignition source within or near the Mill Park precinct. Potential ignition sources include vehicle movements, machinery or maintenance activities, electrical or utility infrastructure, roadside ignition from Mill Road, slashing, hot works, or accidental ignition within nearby industrial or agricultural land. In these conditions, fire behaviour may be more localised and less severe than a landscape-scale event, but could still result in smoke impacts, ember attack, radiant heat, reduced visibility, and constraints to site access or evacuation.
F	Primary and contingency bushfire safety measures.	The primary safety measures in the event of a bushfire will be early evacuation. Evacuation should be implemented where safe to do so, based on advice from emergency services and site-specific trigger points.

[3] North Barker Ecosystem Services (2026)

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Element	Consideration	Detail
		The evacuation procedures will be documented within the Emergency Management Plan and supported by staff training. Where evacuation is no longer safe, or where remaining onsite is assessed as the safer option having regard to fire location, access conditions and advice from emergency services, shelter-in-place will provide the contingency safety measure. In this situation, occupants will move to the designated refuge area within the guardhouse building and remain there until conditions have passed or emergency services advise that it is safe to leave. The guardhouse building has been identified as the designated shelter-in-place location for the facility. It is appropriately separated from higher-risk operational areas, provides sufficient available floor area, and has capacity to accommodate all staff expected to be onsite during any shift.
G	Firefighter access, firefighting services, and firefighter protection.	The site will be designed to provide compliant access for firefighting appliances, including an appropriately constructed internal road that encircles the hazardous use, and hardstand areas. Firefighting infrastructure will include hydrant systems, booster assemblies and clearly identified connection points. Water supply will be reliable and accessible under emergency conditions. Site layout and emergency procedures will support safe access and operational efficiency for responding emergency personnel.
H	Likelihood and consequence if hazardous materials or explosives are impacted by fire.	Hazardous materials associated with the proposed development will primarily comprise diesel fuel, engine oil and lithium iron phosphate ($LiFePO_4$) batteries associated with standby uninterruptible power supply (UPS) diesel generators. Each of the 40 backup UPS diesel generators will contain: • Diesel fuel – up to 10,000 L per generator (stored within double bunded integral belly tanks); • Engine oil – approximately 400 L per generator; and • $LiFePO_4$ batteries – approximately 90 units per generator stack, with a total mass of c. 6,345 kg per generator stack. Diesel fuel will be stored within double bunded integral belly tanks incorporated into the generator units, minimising spill risk and providing secondary containment. No explosives are proposed as part of the development. The potential for significant off-site consequences associated with hazardous materials is considered low, due to appropriate separation distances, compliance with relevant Australian Standards, and the implementation of design controls. Fire and spill risks will be mitigated through engineered controls, appropriate storage and handling procedures, fire protection systems, and site-specific emergency response measures. **Bushfire Risk** • **Likelihood:** In the event of a bushfire impacting the facility the likelihood of hazardous materials being directly impacted by fire is considered low, due to the BAL 12.5 separation distances between the hazardous use on the site, and the use of

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Element	Consideration	Detail
		non-combustible construction materials and compliant fuel storage systems bushfire impacting the site, hazardous materials may be exposed to elevated temperatures or direct flame contact. • **Consequence:** The consequence of fire impacting hazardous materials is considered moderate to high. Potential impacts include: o ignition of diesel fuel from a generator that spreads to surrounding generators, o release of burning liquids, and o catastrophic failure of $LiFePO_4$ batteries. ▪ *It should be noted that batteries in thermal runaway cannot be readily extinguished using conventional firefighting methods and may continue to burn, release heat, or re-ignite until the reaction has fully subsided. Toxic smoke emissions from a battery fire would present a potential hazard to occupants, first responders and people downwind of the facility. In addition, significant volumes of contaminated firefighting water runoff may be generated and would require appropriate containment and management.* These impacts are likely to result in localised fire intensification, smoke generation, and potential release of flammable gases. • **Risk Rating:** While the likelihood of direct bushfire impact is reduced by the proposed bushfire protection and engineering controls, the potential consequences warrant specific consideration as part of the detailed design and emergency planning for the facility. The final arrangement of generators, fuel storage and battery systems, together with fire separation, suppression and containment measures, is to be confirmed through the relevant dangerous goods and fire engineering assessments. The hazardous materials information presented in this EMS is based on the current concept design and available engineering information. Where the final generator, fuel or battery quantities, configuration or location materially differ from those assessed, the bushfire and emergency management implications are to be reviewed. The bushfire emergency plan is to incorporate the outcomes of the relevant dangerous goods and fire engineering assessments prior to operation of the facility. No risk associated with explosives is present, as no explosives are proposed as part of the development.

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4 RISK ANALYSIS

Section 4.2.2 (3) of the TFS Bushfire Emergency Planning Guideline[4] requires a risk analysis in accordance with Section 5 of the Guideline. Some elements listed in Section 5.3 of the Guideline are described previously in this document. Table 2 below provides a qualitative risk analysis that considers the risk characteristics in order to inform an appropriate response.

Table 2. Qualitative risk analysis

Element	Consideration	Detail
A	Potential bushfire scenarios.	Potential bushfire scenarios Possible bushfire scenarios include the approach of a bushfire from surrounding vegetated areas under a range of weather conditions and Fire Danger Ratings, including extreme or catastrophic fire weather conditions. Under these conditions, the site could be exposed to ember attack, radiant heat and potential direct flame contact at the site perimeter. **1. Landscape bushfire scenario** A large landscape fire could approach the facility from classified vegetation under elevated, extreme or catastrophic fire weather conditions. The most significant potential fire runs are associated with grassland from the west, southwest or south. Shorter fire runs (c. 100 m) from a grassland fire into relatively small patches of forest vegetation mapped to the north, east and southeast could also possibly occur. **2. Local ignition scenario** Bushfire could also occur under lower Fire Danger Ratings where there is a local ignition source within or near the Mill Park precinct. Potential ignition sources include vehicle movements, machinery or maintenance activities, electrical or utility infrastructure, roadside ignition from Mill Road, slashing, hot works, or accidental ignition within nearby industrial or agricultural land. In these conditions, fire behaviour may be more localised and less severe than a landscape-scale event, but could still result in smoke impacts, ember attack, radiant heat, reduced visibility, and constraints to site access or evacuation.
B	The likelihood of the identified bushfire scenarios.	Bushfire is a realistic risk over the life of the development, particularly during the fire season (generally September to April), although it can occur at other times. Based on prevailing wind conditions during summer fire weather[5], a large fire is most likely to approach from the northeast, north or northwest.

[4] Bushfire Risk Unit (2025)
5 Bureau of Meteorology (2026)

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Element	Consideration	Detail
		Wind from the southwest is likely to be associated with higher Fire Danger Ratings at the location of the Facility[6]. If a bushfire occurs, the facility may be exposed to ember attack and radiant heat, and in more severe cases, flame contact at the edge of the hazard management area. Taking into account the surrounding vegetation and regional context, the likelihood of bushfire affecting the site is considered low to moderate, depending on seasonal conditions and fuel loads.
C	The possible consequences for occupants and assets	Bushfire will foreseeably pose risks to human life safety and built assets. Emergency planning for the facility will be primarily focused on life safety over all other objectives. Occupants could be exposed to life-threatening conditions in the event that: • They are present onsite and are unprepared or unable to take appropriate action to protect themselves • The designated shelter areas within the building are inaccessible or compromised by fire or system failure • They attempt to evacuate the site when conditions have deteriorated to the point that safe egress is no longer possible Additional consequences may include: • Damage to external plant and infrastructure (e.g. generators, cooling systems), potentially affecting fire protection and building services • Disruption to power supply and operational systems, including reliance on backup generation • Smoke ingress affecting internal air quality and visibility The potential consequences for life safety are unacceptable and warrant emergency planning procedures to mitigate the above risks.
D	Any existing controls that modify the risk	A range of measures are in place or proposed to reduce both the likelihood of impact and the consequences if a bushfire occurs. These include: • A Bushfire Hazard Management Plan, including a BAL 12.5 bushfire hazard management area around all buildings (calculated using a conservative FDI 80 design scenario). • Construction of all habitable buildings (most notably the onsite fire refuge) as well as all building associated with the storage of hazardous materials (UPS backup generators) designed and constructed to BAL 12.5 under AS3959: 2018 • Diesel fuel associated with backup power generation stored in double-bunded belly tanks, reducing the likelihood of fuel release and providing containment in the event of damage or failure.

[6] Pers comm Tom O'Connor, Tasmania Fire Service (May 2026)

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Element	Consideration	Detail
		• $LiFePO_4$ batteries housed within the generator units, reducing their exposure to radiant heat and ember attack in the event of a bushfire. • A dedicated firefighting water supply via tanks, pumps and boosters (effectively operating as a reticulated system) • Fire detection, alarm, hydrant and sprinkler systems integrated with building management systems • An on-site Emergency Control Organisation (ECO) with trained staff across all shifts • Backup power to maintain critical systems during outages • Site access and layout designed to support emergency response and firefighting Together, these measures significantly reduce the overall level of risk.
E	Scenario testing for both shelter and evacuation options across a range of bushfire scenarios.	Evacuation is expected to be achievable within a relatively short timeframe, given the limited number of people onsite (around 10 at peak), the controlled nature of the facility, and the presence of trained staff. A full evacuation could likely be completed within 30 – 55 minutes, provided there is sufficient warning and safe access. **Evacuation** Evacuation is the preferred response and will be initiated early wherever possible, using a trigger-based approach aligned with Tasmania Fire Service (TFS) warnings, fire location, predicted fire behaviour, weather conditions, road/access conditions and advice from emergency services. The response to TFS warnings will be scalable and may include increased monitoring, reduction of non-essential staff onsite, preparation for evacuation, staged evacuation, full evacuation, or sheltering onsite if evacuation is no longer safe. A possible response framework is outlined below: • Advice / elevated fire danger (e.g. Total Fire Ban): increased monitoring by the Emergency Control Organisation (ECO), review of fire location and forecast conditions, confirmation of communication systems, readiness of evacuation routes, and preparation for possible staff reduction or evacuation if conditions escalate. • Watch and Act: active assessment of the potential fire threat to the site, including fire location, rate and direction of spread, forecast wind changes, access route safety and advice from emergency services. Depending on the assessed risk and/or advice from emergency services, the facility may reduce staff numbers onsite, relocate or release non-essential personnel, prepare for staged evacuation, or continue operating with heightened readiness where the fire is not expected to impact the site.

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Element	Consideration	Detail
		A Watch and Act warning would not automatically require full evacuation or facility shutdown, particularly where there is sufficient separation from the fire front (such as a fire occurring east of Port Sorell, west of Devonport, or south of Latrobe) and suitable onsite refuge options remain available. • Emergency Warning: evacuation should only proceed if it can be completed safely and preferably should already have occurred where there is a credible threat to the site. If evacuation routes are compromised, conditions have deteriorated, or emergency services advise against evacuation, occupants should shelter onsite in the designated refuge area until it is safe to leave. The aim is to make decisions early enough to avoid exposing occupants to smoke, embers, radiant heat or unsafe road conditions. Where there is uncertainty, the response should err toward reducing staff numbers onsite and preparing for evacuation before conditions deteriorate. Sheltering onsite is a contingency response only, to be used where evacuation is no longer safe, or where remaining onsite is assessed as the safer option given the fire location, available refuge, access conditions and advice from emergency services. This may occur if a fire is too close, access routes are compromised, conditions deteriorate rapidly, or a warning remains in place for an extended period without a direct threat to the site, but where onsite readiness is still required. The guardhouse is considered the most suitable shelter-in-place option, as it is positioned away from the hazardous goods/use in the facility (UPS diesel generators) and is close to site access/egress. **Sheltering onsite – guardhouse building** Sheltering onsite is a contingency only, to be used if evacuation is no longer safe. This may occur if a fire is too close, access routes are compromised, or conditions deteriorate rapidly. In these cases, occupants would move to a designated refuge area within the facility and remain there until it is safe to leave. The guardhouse building will be the best option for shelter in place as the building is positioned away from the higher-risk areas of the facility, has a floor area large enough to accommodate all staff members and is close to the site access/egress. Guardhouse The guardhouse building provides approximately 23 m^2 of floor area. Subject to the implementation and ongoing maintenance of the proposed bushfire hazard management area the expected exposure to the guardhouse in the event of a fire impacting the site is a maximum of 12.5 kW/m^2. The BAL assessment has

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Element	Consideration	Detail
		been conservatively based on FDI 80, rather than FDI 50, which is the minimum design basis required for bushfire protection in Tasmania. The guardhouse building will be constructed to a BAL 12.5 standard. For short-term bushfire sheltering, an occupancy allowance of 1 m^2 per person has been adopted to allow for people, limited personal items, movement within the shelter space on this basis the guardhouse building could reasonably accommodate all staff during any shift at any point in the day for sheltering onsite, subject to adequate access/egress.

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5 PROPOSED EMERGENCY MANAGEMENT RESPONSES

Section 4.2.2 (4) of the TFS Bushfire Emergency Planning Guideline[7] requires that the proposed emergency management responses be determined.

In response to the risk analysis, the bushfire emergency plan will include actions relevant to all stages of future bushfire emergencies.

5.1 PREVENTION

A range of pre-emptive measures must be put in place to reduce both the risk of ignition onsite and the likelihood of people being present during periods of elevated bushfire danger. Given the facility is continuously operated and staffed 24/7, the focus is on early action, clear triggers and avoiding exposure wherever possible.

Key measures will include:

Fire weather monitoring and trigger-based response

- *Ongoing monitoring of fire weather forecasts, Fire Danger Ratings (FDR) and Tasmania Fire Service (TFS) warnings through reliable communication systems.*
- *A trigger-based response framework to guide operational decisions as conditions change.*

Reducing onsite personnel during high-risk periods

- *During Extreme or Catastrophic Fire Danger Ratings, non-essential personnel will not attend the site.*
- *Staffing will be limited to essential operational and safety roles only.*

Pre-emptive shutdown and evacuation

- *Depending on the assessed risk and/or advice from emergency services, the facility may reduce staff numbers onsite, relocate or release non-essential personnel, prepare for staged evacuation, or continue operating with heightened readiness where the fire is not expected to impact the site.*
- *A pre-emptive shutdown and full site evacuation will be undertaken where directed by emergency services.*

Proximity-based triggers

- *Bushfire reported within approximately 20 km of the facility will trigger increased monitoring and assessment by the ECO. This distance is intended as an early-awareness trigger and does not, by itself, indicate that the facility is threatened.*
- *Bushfire within approximately 10 km will trigger active consideration of pre-emptive evacuation. A decision to evacuate will consider the location of the fire relative to the facility, fuel continuity, rate and direction of spread, forecast weather and wind changes, condition of the evacuation route, TFS warnings and advice from emergency services.*

[7] Bushfire Risk Unit (2025)

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- *Evacuation may be initiated at distances greater than 10 km where fire behaviour or forecast conditions indicate a credible threat to the facility or evacuation route.*

Ignition source control

- *Strict controls on potential ignition sources, including hot works, electrical equipment and maintenance activities.*
- *Hot works will be restricted or avoided on Total Fire Ban days or during elevated fire weather unless appropriate permits and controls are in place.*
- *Plant and equipment will be regularly maintained to minimise ignition risk.*

Bushfire hazard management and maintenance

- *Ongoing maintenance of the hazard management area (HMA) in line with the Bushfire Hazard Management Plan (BHMP).*

Staff training and awareness

- *Training on site-specific emergency procedures must be provided on an annual basis to all staff. This training must also apply to all new staff members as a part of their site induction.*
- *Training must be in accordance with AS 3745: 2010 Planning for emergencies in facilities.*
- *Clear communication processes must be in place to ensure personnel are kept up to date on conditions and required actions.*

Coordination with emergency services

- *Close monitoring of TFS warnings and advice.*
- *Emergency response, such as evacuation will align with emergency service guidance during bushfire events.*

5.2 PREPAREDNESS

Site preparations and maintenance will be prescribed as part of the bushfire emergency plan, to be implemented prior to the bushfire season.

This will include:

- *Staff training.*
- *Maintenance of hazard management areas.*
- *Maintenance of firefighting water supply.*
- *Maintenance of firefighting access/egress.*
- *Maintenance and preparation of buildings within the facility.*

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Pre-emptive procedures will be developed to support Emergency Control Organisation (ECO) and occupant preparedness.

This will include:

- *Daily monitoring of fire weather conditions and warnings.*
- *Staff briefings when bushfires are active in the local area or when Fire Danger Ratings are High or above.*
- *Ensuring all personnel are aware of current conditions, risks and any required actions.*

5.3 RESPONSE

Emergency response procedures will prioritise early evacuation, with shelter-in-place providing a contingency option.

It is estimated that approximately 44 - 54 minutes will be required to initiate and complete full site evacuation to the designated offsite refuge*. This is based on the analysis of the required steps in Table 3 below.

Table 3. Key steps and duration estimated for early evacuation

Step	Justification	Estimated required time
Detection	Instant based on ECO preparedness	0 m
Raising the alarm	Notification to all personnel via established communication protocols	2 m
ECO briefing / coordination	ECO staff coordinate pre-determined roles, responsibilities, and review situational information before initiating evacuation	5 m
Occupant instruction and coordination	Staff briefed on fire conditions, evacuation routes, and assembly at TFS nearby safer place	5 - 10 m
Movement to offsite refuge* (occupants and non-ECO staff)	Occupants follow designated routes to offsite refuge; timing reflects facility layout, distances, and number of personnel (up to 10 dependant on time of day)	13 - 15 m
Facility check and closure	ECO staff secure the site, shut down critical systems, and ensure building and equipment are safe prior to leaving	10 m
Movement to offsite refuge* (ECO staff)	ECO staff evacuate after completing site checks and shutdown tasks; timing accounts for distances and load of responsibilities	9 - 12 m
Total estimated time required	Based on cumulative times for all steps, including coordination, movement, and site closure	44 - 54 minutes

***'TFS nearby Safer Places' - Port Sorell Cricket Oval, Port Sorell, 28-42 Rice Street, Port Sorell TAS 7307.[8]**

[8] Land Information System Tasmania (2026)

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Consistent with the proximity-based response framework outlined in Section 5.1, factors triggering consideration of evacuation include:

- *Fire activity is reported within the broader area (approximately 20 km) and conditions indicate a potential threat.*
- *Fire activity is identified within closer proximity (approximately 10 km), taking into account fire behaviour, direction of spread and advice from Tasmania Fire Service (TFS).*
- *Fire Danger Ratings reach Extreme or Catastrophic levels and there is known fire activity in the broader area (20 km).*
- *Any TFS warning or directive indicating that evacuation is recommended or required.*

In some situations, it will be unsafe to evacuate the site, either because of the time required to complete evacuation or due to the egress route becoming compromised.

Shelter-in-place procedures will accordingly be triggered in situations when:

- *A bushfire is in very close proximity and there is insufficient time to evacuate safely.*
- *Egress routes are compromised by fire, smoke, traffic, or emergency service restrictions.*
- *An Emergency Warning is issued, and conditions have deteriorated such that evacuation would expose occupants to greater risk than remaining onsite.*

5.4 RECOVERY

The bushfire emergency plan will specify what needs to occur prior to reopening the facility. This will include verification of damage to buildings and identification of any hazards that require mitigation for safety purposes.

The bushfire emergency plan will specify actions to be taken after an emergency to support facility staff. This will include provision of support for facility staff who have been injured or traumatised by the incident.

6 IMPLEMENTATION

The strategies outlined in this document will inform the preparation of a bushfire emergency plan – which is required at the building permit stage. The bushfire emergency plan will be prepared in accordance with the TFS Bushfire Emergency Planning Guideline[9].

The bushfire emergency plan will be prepared in consultation with the Emergency Planning Committee, Pitt and Sherry, Firmus Technologies Pty. Ltd. and the Tasmania Fire Service.

[9] Bushfire Risk Unit (2025)

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pitt&sherry

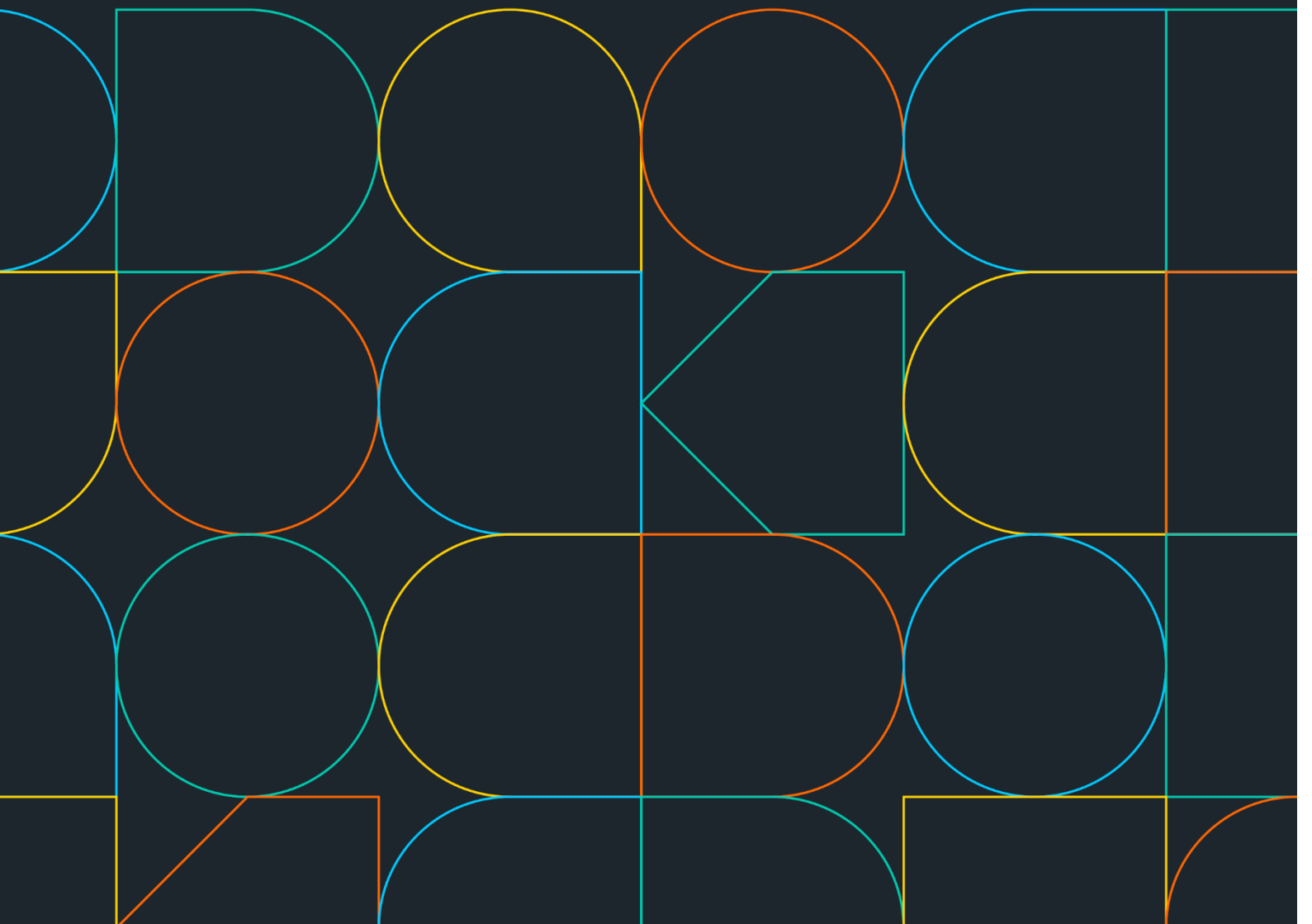
Planning Report

Firmus – Wesley Vale

Pitt & Sherry (Operations) Pty Ltd
ABN 67 140 184 309

Phone 1300 748 874
info@pittsh.com.au
pittsh.com.au

Located nationally -
Melbourne
Sydney
Brisbane
Hobart
Launceston
Newcastle
Devonport



Plume-rise Assessment

Annexure D

pitt&sherry

Wesley Vale AI Factory: Plume Rise Assessment

Prepared for:

Verto

September 2026

Final

Prepared by:

Katestone Environmental Australia Pty Ltd
ABN 21 680 559 095
Level 4, 154 Melbourne Street, South Brisbane
Queensland, 4101, Australia

www.katestone.global
admin@katestone.com.au
Ph +61 7 3369 3699

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Glossary

Term	Definition
°	degrees
°C	degrees Celsius
km	kilometres
m	metres
m/s	metres per second
Abbreviation	**Definition**
AC	Advisory Circular
AHD	Australian Height Datum
BoM	Bureau of Meteorology
CASA	Civil Aviation Safety Authority
CPH	Critical Plume Height
EPA	MITRE Exhaust Plume Analyzer
NEPC	National Environment Protection Council
NGER	National Greenhouse and Energy Reporting
OLS	Obstacle Limitation Surface
TAPM	The Air Pollution Model
TAS	Tasmania
UTM	Universal Transverse Mercator

EXECUTIVE SUMMARY

Katestone Environmental Australia Pty Ltd (Katestone) has been commissioned by Verto, on behalf of Firmus Technologies, to conduct a plume rise assessment to determine the risk to aviation safety due to vertical plumes emitted from a proposed data centre located in Wesley Vale, Tasmania (the Project).

The Project is a data centre incorporating outdoor cooling units and emergency backup power generators. The Project is proposed to be located in the southeastern corner of the Mill Park industrial precinct, approximately 1.6 km southeast of Devonport Airport. The cooling units and backup generators will produce vertical plumes that require assessment to determine the risk to aircraft using the nearby airport.

The assessment has been carried out in accordance with the Australian Civil Aviation Safety Authority (CASA) document, Advisory Circular AC 139.E-02v1.1, which outlines the procedure for assessing the risk to aviation safety due to plume rise.

The following components have been completed in accordance with the AC:

- Generation of a suitable site representative meteorological file using TAPM (The Air Pollution Model) for input into the MITRE Exhaust Plume Analyzer (EPA) model
- Modelling the risk to aviation safety using the EPA
- Assessing the risks against the AC requirements.

The Obstacle Limitation Surface (OLS) for the Devonport Airport is 51.5 m AHD at the Project site. However, as the Project site is located on elevated terrain with a ground level of approximately 50 m, existing buildings and trees in the close vicinity already protrude above the OLS. Existing buildings in Mill Park include the Main Pulp Mill building at 72.5 m AHD (21 m AGL) while the hill itself reaches a height of approximately 90 m AHD within 500 m of the project site. The Project buildings and vertical plumes will also penetrate the OLS; however, due to the height of the surrounding terrain and infrastructure, the plume assessment has not been made at the OLS, rather, it has been made at the height of the Main Pulp Mill building on the basis that the minimum height of aircraft will be well above this building.

The EPA has been used to predict the probability of moderate turbulence occurring as a result of the Project. The results indicate that the probability of aircraft being affected by moderate turbulence from the proposed chillers, coolers and emergency generators falls below the $1x10^{-5}$ threshold within 6 m of the plume release point and, therefore, is below the height of the existing buildings.

1. INTRODUCTION

Katestone Environmental Australia Pty Ltd (Katestone) has been commissioned by Verto, on behalf of Firmus Technologies, to conduct a plume rise assessment to determine the risk to aviation safety due to vertical plumes emitted from a proposed data centre located in Wesley Vale, Tasmania (the Project).

The Project is a data centre incorporating outdoor cooling units and emergency backup power generators. The Project is proposed to be located in the southeastern corner of the Mill Park industrial precinct, approximately 1.6 km southeast of Devonport Airport. The cooling units and backup generators will produce vertical plumes that require assessment to determine the risk that they could interfere with aircraft using the nearby airport.

In Australia, the government body that regulates aviation safety is the Australian Civil Aviation Safety Authority (CASA). CASA has produced an advisory circular (AC) Plume Rise Assessments (AC 139.E-02v1.1) (April 2026) that specifies the procedure for assessing the risk to aviation safety due to exhaust plumes from industrial processes. Katestone's assessment of the Project has been conducted in accordance with the AC.

This report presents the methodologies and outcomes of the plume rise assessment. The report has been divided into the following sections:

- Details of the proposed development are provided in Section 2
- Details of the regulatory framework for plume rise assessments are provided in Section 3
- The aviation protection surfaces of interest are described in Section 4
- The assessment methodology including the approach used to generate suitable meteorological data using TAPM (The Air Pollution Model) for input into the MITRE Exhaust Plume Analyser (EPA) is described in Section 5
- The results of the modelling of risk to aviation safety using the EPA and assessment of the risks against the AC requirements are provided in Section 6
- Conclusions are provided in Section 7.

2. PROPOSED DEVELOPMENT

The Project is proposed to be located in the southeastern corner of the Mill Park industrial precinct, at 226 Mill Road, Wesley Vale. The site is adjacent to a TasNetworks substation. The area surrounding the industrial estate is primarily agricultural land.

The Project site is on a small hill. It is located approximately 2 km from the coast, 1.6 km southeast of Devonport Airport.



Figure 1 Location of Project

The Project will include the following elements that will have a vertical discharge of air:

- 20 JAEGGI adiabatic coolers, with four 2.13 m fans on each
- 20 Smardt evaporative chillers, with six 0.94 m fans on each
- 40 ElectropaK emergency backup generators, with two exhaust stacks on each.

The discharge characteristics for each of the sources are presented in Table 1. These discharge characteristics have been used in the EPA model.

Plumes emitted in close proximity to each other have the potential to merge, which can lead to enhanced plume rise. The EPA model accounts for merging plumes from sources arranged in a straight line. This assessment has considered the enhancement from interactions between plumes from a single unit. The spacing between separate units is anticipated to be sufficient to ensure minimal interactions.

The assessment is considered to be conservative because plume rise is highest under cool, still conditions. The chillers and coolers will be required to operate at higher loads when ambient temperatures are higher and plume

rise is reduced. The emergency generators have been assessed as operating continuously; however, in practice they will operate infrequently.

Table 1 Stack parameters used for MITRE EPA plume rise modelling

Parameter	Units	Coolers	Chillers	Generators
Stack height	m AGL	10	10	10
Stack diameter	m	2.13	0.941	0.254
Exhaust velocity	m/s	8.47	6.89	86.3
Exhaust temperature	°C	42.6	40.5	500
Sources in a line		4	6	2
Source separation	m	2.2	0.96	1.8

3. REGULATORY FRAMEWORK FOR PLUME RISE ASSESSMENTS

Exhaust plumes from chimneys, stacks, vents or other industrial process have the potential to affect aircraft safety if they are sufficiently hot or large to rise quickly due to their buoyancy and/or initial vertical momentum and induce a significant updraft. CASA has identified the need to assess the potential hazard to aviation associated with exhaust plumes.

Exhaust plumes can originate from the following:

- Industrial facilities that release process emissions through stacks or vents
- Industrial flares that create an instantaneous release of hot gases during the depressurisation of gas systems
- Cooling towers that produce large volumes of buoyant gases that can rise a significant distance into the atmosphere
- Exhaust gases from power generation facilities that can produce plumes of varying velocities during different operating scenarios.

To assess the potential hazard to aviation safety from industrial exhaust plumes, CASA developed AC 139.E-02v1.1, for plume rise assessments. Australian regulations provide that CASA may determine that a gaseous efflux having a velocity in excess of 6.1 metres per second (m/s) at the point of emission may be a hazard to aircraft operations because of the velocity or location of the efflux and define 6.1 m/s as the level that may be capable of affecting normal flight by inducing turbulence. While 6.1 m/s is the defined threshold, an exhaust plume with an efflux velocity above 4.3 m/s triggers the need for a report to be issued to CASA. Note that the AC states that

> *Upon receiving these notifications, in line with the amended APAR, CASA will note the report but will NOT issue a determination that emissions sources generating gaseous efflux with velocities of 6.1 m/s or lower are hazards to aircraft operations.*

A velocity above 6.1 m/s will require CASA to complete a more detailed plume rise assessment and risk to aviation safety. If the efflux velocity is less than 4.3 m/s, no further action is required.

The AC defines three methods for determining the appropriateness of an exhaust plume:

- Screening tool
- MITRE EPA and turbulence intensity threshold
- CFD modelling with a vertical velocity of 6.1 m/s for stacks with engineering modifications.

The following extracts from the AC outline the procedure that is followed:

> *2.2.2 The proponent should make an initial assessment of the plume exit velocity. If the exit vertical velocity is less than 6.1 m/s but more than 4.3m/s, a Form 1247 must be submitted to CASA: (anaa.corro@casa.gov.au), however proponents should note the guidance provided by CASA in paragraphs 2.1.4, 2.1.5 and 2.1.6 above.*
>
> *2.2.3 If the exit vertical velocity exceeds 6.1 m/s, a Form 1247 must be submitted to CASA: (anaa.corro@casa.gov.au).*
>
> *2.2.5 CASA will use the information provided in Form 1247 to conduct a preliminary assessment. This will be conducted using the CASA screening tool.*
>
> *2.2.6 If the outputs of the screening tool indicate that the plume velocity will not infringe a flight protection surface at a velocity exceeding 6.1 m/s, no further assessment is required. Flight protection*

surfaces include Obstacle Limitation Surface (OLS)/Procedures for Air Navigation Services - Aircraft Operations (PANS-OPS) surfaces, restricted/danger areas and established flight paths.

2.2.7 If the outputs of the screening tool indicate that the plume velocity will infringe a flight protection surface at a vertical velocity exceeding 6.1 m/s, CASA will use the information provided to conduct a detailed assessment of the impact of the plume rise proposal using the EPA.

2.2.8 If the proposal is located outside the OLS of the nearest certified aerodrome, CASA will conduct a detailed assessment using the EPA only if the plume velocity exceeds 6.1 m/s at 150 m above ground level (AGL).

The crucial parameter calculated by the EPA is the Critical Plume Height (CPH). The CPH is defined in AC 139.E-02v1.1 as follows:

The height up to which there is an unacceptable probability of the plume affecting the handling characteristics of an aircraft in flight such that there is an undesirable risk to aircraft safety

The turbulence intensity thresholds that are relevant to the assessment of plumes are reproduced in Table 2.

Table 2 Turbulence intensity specifications

Intensity	G load	Aircraft reaction	Reaction inside aircraft
Light	0.15-0.49	Momentary slight and erratic changes in attitude and/or altitude. Rhythmic bumpiness.	Little effect on loose objects.
Moderate	0.50-0.99	Appreciable changes in attitude and/or altitude. Pilot remains in control at all times. Rapid bumps or jolts.	Unsecured objects move. Appreciable strain on seatbelts.
Severe	1.00-1.99	Large abrupt changes in attitude and/or altitude. Momentary loss of control	Unsecured objects are tossed about. Occupants violently forced against seatbelts.

The AC provides threshold levels for assessment of risk at various locations in the vicinity of airports. These are reproduced in Table 3. The shaded section highlights the criteria the Project has been assessed against. Based on the location of the Project, this is a conservative assessment approach.

Table 3 Probability and turbulence threshold levels for assessment of risk (AC139.E-02v1.1)

Flight protection surface	Probability threshold values	Turbulence threshold levels
PANS-OPS/Doc 9905/9613 surface	1×10^{-5} per operation	Moderate
Approach surface/take off climb surface/inner horizontal, conical and outer horizontal surfaces (below established flight paths)	1×10^{-5} per operation	Moderate

Flight protection surface	Probability threshold values	Turbulence threshold levels
Inner horizontal, conical and outer horizontal surfaces (not below established flight paths)	1×10^{-5} per operation	Severe
Outside the OLS (flight protection surface set at 1000 m /3050 ft AGL)	1×10^{-4} per operation	Severe

Versions of the advisory circular prior to AC 139.E-02v1.0 required plume modelling to be conducted using the TAPM model. TAPM was developed in Australia by the Commonwealth Scientific and Industrial Research Organisation (CSIRO). TAPM has been used in the assessment of the Project to generate the meteorological data for use in MITRE EPA. TAPM includes a prognostic meteorological model that is recognised under the AC 139.E-02v1.1 for generating the wind and potential temperature profile inputs for the MITRE EPA.

4. AVIATION PROTECTION SURFACE OF INTEREST

The Project site is located 1.6 km southeast of Devonport Airport, and within the inner horizontal surface boundary of the OLS, which is 51.5 m AHD, as shown in Figure 2.

The Project site is located on elevated terrain with a ground level of approximately 50 m. There are a number of existing buildings and trees that are close to the Project site that exceed the OLS height. The hill reaches a height of approximately 90 m within 500 m of the project site. Existing buildings and vegetation protrude above the OLS inner horizonal surface within the industrial area, including the main Pulp Mill building at 72.5 m AHD.

Due to the existing structures on the Project site and surroundings, it can be expected that plumes will not present a risk to aircraft if the critical height is below 72.5 m AHD, or 21 m above ground level (AGL) on the basis that the minimum height of aircraft will be well above existing Mill Park buildings.

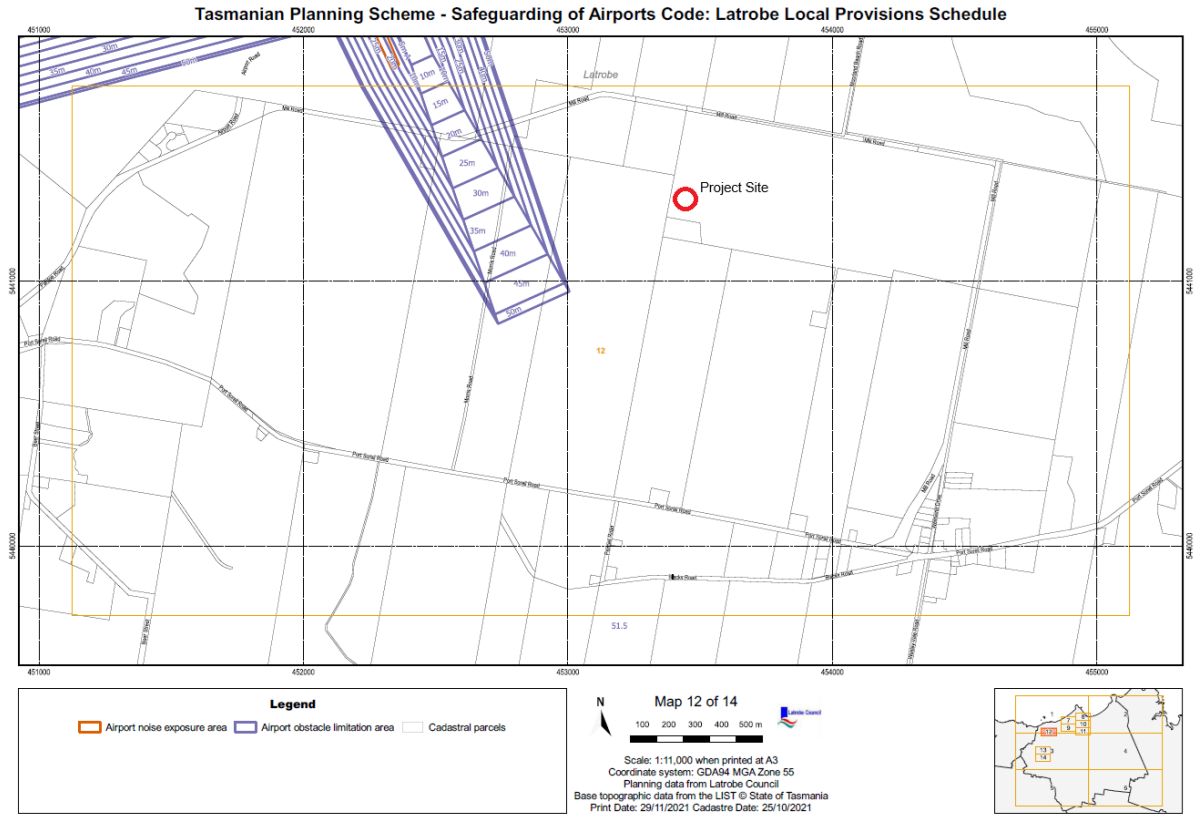


Figure 2 **Devenport Airport Obstacle Limitation Surface (Tasmanian Planning Scheme)**

5. ASSESSMENT METHODOLOGY

5.1 MITRE Exhaust Plume Analyser

The MITRE EPA is an aviation risk assessment model based on the Spillane plume rise model. The inputs that this model requires are as follows:

- Local meteorology data consisting of hourly wind speed and temperature measurements at a number of altitudes; MITRE recommends a minimum of three years' data.
- Aircraft flight response parameters – parameters for four types of aircraft are included in the model.
- Source parameters – these are entered by the user through the model's graphical user interface.

The aircraft types included in the model are:

- Light general aviation – small aircraft carrying less than about 6 persons
- Light sport aviation – small aircraft carrying less than about 6 persons
- Business jet – an aircraft in the Lear jet class
- Narrow body jet – commercial airliner carrying about 100 persons.

The model produces contours of probability that an aircraft may experience medium, moderate, high and severe turbulence. In addition, MITRE has updated the Exhaust Plume Analyzer to include the 4.3 m/s critical plume velocity. This setting was applied for all modelling scenarios.

5.2 TAPM meteorological modelling

The TAPM model is a prognostic model that has the capability of generating meteorological outputs (both spatially gridded parameters and vertical profiles) as well as incorporating the functionality for producing vertical profiles of the plume. TAPM was used to generate the meteorological input for the MITRE EPA assessment.

The MITRE EPA requires hourly profiles of wind speed and potential temperature to calculate plume characteristics at various heights. MITRE recommends that a minimum of 3 years of meteorological data be used for the analyses. Three years of hourly meteorological data for the 2022 to 2024 period were used for the assessment.

Details of the TAPM meteorological configuration are provided in Appendix A.

6. RESULTS

The MITRE EPA generates vertical profiles of probability of turbulence intensity ranging from moderate through to extreme. The results are presented in the form of two-dimensional contour plots, namely: height AGL and distance from the stack. The MITRE EPA also generates the critical height, which is the maximum elevation where the probability of moderate turbulence equals 1 x 10^{-5}. One set of results from the MITRE EPA are generated for each of four common aircraft types, namely:

- Narrow Body Jet
- Business Jet
- Light General Aviation
- Light Sport.

6.1 Coolers

No outputs were produced by the MITRE EPA model, which indicates that the plume reaches ambient conditions within 6 diameters of the release point (12.8 m).

6.2 Chillers

No outputs were produced by the MITRE EPA model, which indicates that the plume reaches ambient conditions within 6 diameters of the release point (5.6 m).

6.3 Emergency Backup Generators

A sample EPA output plot for the emergency backup generators, assessed for the light general aviation aircraft class, is shown in Figure 3. The figure shows the inputs to the model, and indicates that the probability of moderate turbulence due to the plume is too limited to plot a contour. The critical heights for all aircraft classes are shown in Table 4, which shows that for all classes the critical height is 16 m above ground level, or approximately 66 m AHD. This is below the height of surrounding buildings.

Table 4 Heights above which the probability of moderate turbulence occurring is less than 10^{-5} (AGL)

Aircraft class	Critical height (m) at the 10^{-5} probability
Narrow Body Jet	16
Business Jet	16
Light General Aviation	16
Light Sport	16

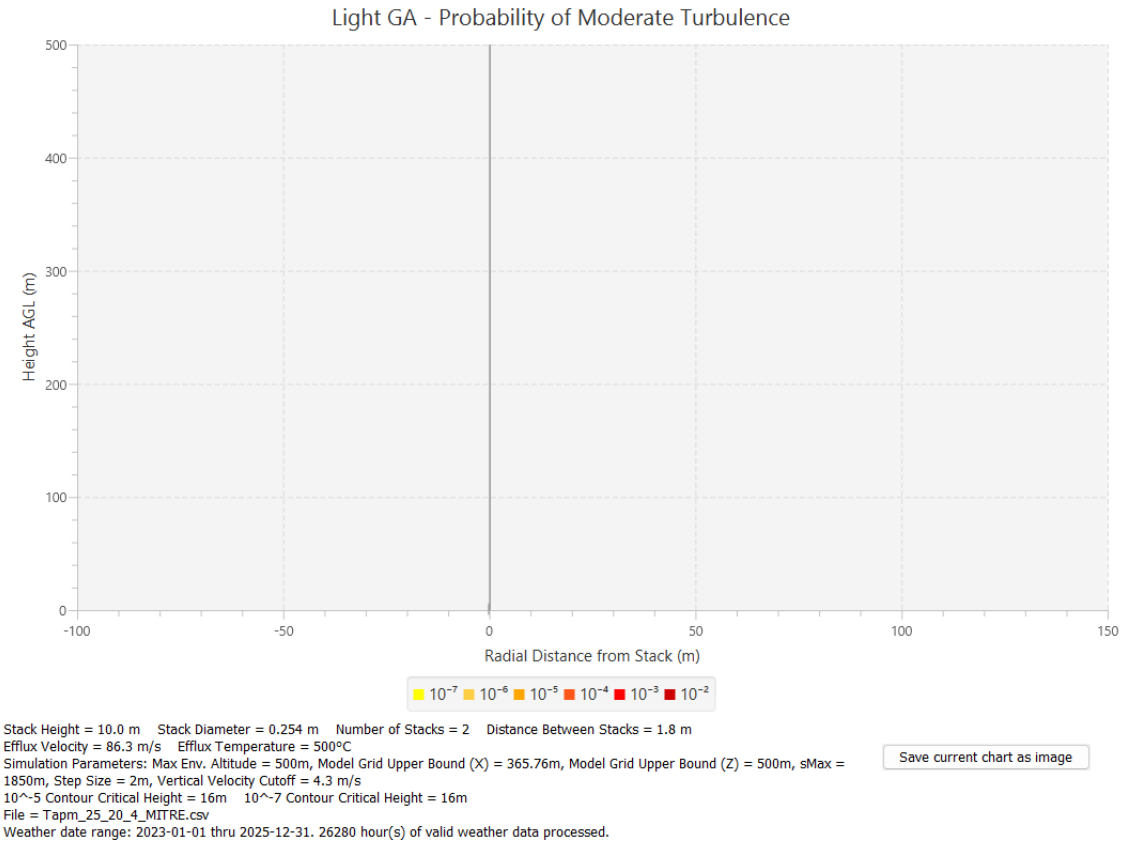


Figure 3 MITRE EPA output for the emergency generator

7. CONCLUSIONS

Katestone has been commissioned by Verto, on behalf of Firmus Technologies, to conduct a plume rise assessment to determine the risk to aviation safety due to vertical plumes emitted from the Project, a proposed data centre located in Wesley Vale, Tasmania.

The Project is a data centre incorporating outdoor cooling units and emergency backup power generators. The Project is proposed to be located in the southeastern corner of the Mill Park industrial precinct, approximately 1.6 km southeast of Devonport Airport. The cooling units and backup generators will produce vertical plumes that require assessment to determine the risk to aircraft using the nearby airport.

The assessment has been carried out in accordance with the Australian Civil Aviation Safety Authority (CASA) document, Advisory Circular AC 139.E-02v1.1, which outlines the procedure for assessing the risk to aviation safety due to plume rise.

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- Modelling the risk to aviation safety using the EPA
- Assessing the risks against the AC requirements.

The Obstacle Limitation Surface (OLS) for the Devonport Airport is 51.5 m AHD at the Project site. However, as the Project site is located on elevated terrain with a ground level of approximately 50 m, existing buildings and trees in the close vicinity already protrude above the OLS. Existing buildings in Mill Park include the Main Pulp Mill building at 72.5 m AHD (21 m AGL) while the hill itself reaches a height of approximately 90 m AHD within 500 m of the project site. The Project buildings and vertical plumes will also penetrate the OLS; however, due to the height of the surrounding terrain and infrastructure, the plume assessment has not been made at the OLS, rather, it has been made at the height of the Main Pulp Mill building on the basis that the minimum height of aircraft will be well above this building.

The EPA has been used to predict the probability of moderate turbulence occurring as a result of the Project. The results indicate that the probability of aircraft being affected by moderate turbulence from the proposed chillers, coolers and emergency generators falls below the $1x10^{-5}$ threshold within 6 m of the plume release point and, therefore, is below the height of the existing buildings.

8. REFERENCES

Australian Government Civil Aviation Safety Authority (CASA), 2023, Advisory Circular AC 139.E-02v1.1 Plume rise assessments, April 2026, File ref D26/86886

APPENDIX A METEOROLOGICAL MODELLING METHODOLOGY

A1.1 TAPM meteorological modelling configuration

TAPM (The Air Pollution Model) was developed by the CSIRO and has been validated by the CSIRO, Katestone and others for many locations in Australia, in south-east Asia and in North America (CSIRO, 2008). Katestone has extensive experience with TAPM for sites throughout Australia and in parts of America, Bangladesh, New Caledonia and Vietnam. The model performs well in simulating regional wind patterns and has proven to be a useful tool for simulating meteorology in locations where monitoring data providing the vertical distribution of meteorological parameters are unavailable.

TAPM is a prognostic meteorological model which predicts the flows important to regional and local scale meteorology, such as sea breezes and terrain-induced flows from the larger-scale meteorology provided by the synoptic analyses. TAPM solves the fundamental fluid dynamics equations to predict meteorology at a mesoscale (20 km to 200 km) and at a local scale (down to a few hundred metres). TAPM includes parameterisations for cloud/rain micro-physical processes, urban/vegetation canopy, soil type and radiative fluxes.

TAPM requires synoptic meteorological information for the region. This information is generated by a global model similar to the large-scale models used to forecast the weather. The data were supplied on a grid resolution of approximately 75 km, and at elevations of 100 m to 5 km above the ground. TAPM uses this synoptic information, along with specific details of the location such as surrounding terrain, land-use, soil moisture content and soil type to simulate the meteorology of a region as well as at a specific location.

TAPM version 4.0.5 was configured with the following parameters:

- Modelling period from 1 January 2023 to 31 December 2025
- 50 x 50 grid point domain with nesting resolutions of 30 km, 10 km, 3 km, and 1 km
- 25 vertical levels
- Grid centred on latitude -41° 8.0', longitude 146° 27'
- Geoscience Australia 9 second DEM terrain data
- Tasmanian EPA land cover dataset, edited to be consistent with aerial imagery
- Default options selected for advanced meteorological inputs.

Due to an error in the input synoptic dataset a single day, 5 August 2024, could not be processed and was not included in the meteorological dataset. The remaining dataset covered three 365-day periods, so remains compliant with MITRE EPA's data requirements.

MEMORANDUM

To	Andrew Goelst, agoelst@vertotas.com.au
From	Michael Burchill, michael.burchill@katestone.com.au
Client name	Verto
Deliverable No.	D26038-3
Subject	Wesley Vale R&D Facility Plume Rise Assessment
Date	28 September 2026

Dear Andrew,

Katestone Environmental Australia Pty Ltd (Katestone) was engaged by Verto, on behalf of Firmus Technologies, to conduct a plume rise assessment of the Wesley Vale AI Factory Project, located at 226 Mill Road, Wesley Vale, Tasmania.

Katestone conducted an assessment in September 2026, described in the report *D26038-2 Wesley Vale AI Factory: Plume Rise Assessment*, which showed that the plume rise from the facility did not have the potential to affect aircraft above the height of nearby buildings. The assessment was carried out in accordance with the Australian Civil Aviation Safety Authority (CASA) document, Advisory Circular AC 139.E-02v1.1, which outlines the procedure for assessing the risk to aviation safety due to plume rise.

Katestone understands that Firmus Technologies proposes to develop a similar facility, known as the Wesley Vale R&D Facility, in an adjacent lot to the Wesley Vale AI Factory. The R&D Facility will include the following elements that will have a vertical discharge of air:

- 20 JAEGGI adiabatic coolers, with four 2.13 m fans on each
- 20 Smardt evaporative chillers, with six 0.94 m fans on each
- 2 ElectropaK emergency backup generators, with two exhaust stacks on each.

The R&D Facility is within the airport Obstacle Limitation Surface (OLS) and will have to submit a Form 1247 due to the identified sources having vertical velocities greater than 4.3 m/s. The conclusions of the plume rise assessment of the Wesley Vale AI Factory have been determined to applicable to the Wesley Vale R&D Facility, based on the following considerations:

- the infrastructure at the two facilities is of the same type
- the number of units of each type is either the same (chillers and coolers) or fewer (generators) at the R&D facility than the AI Factory site
- The ground level at the two sites is within 5 m of each other
- The sites are sufficiently separated that the plumes interactions will be negligible
- The proximity of the sites is such that the same meteorological file generated by The Air Pollution Model (TAPM) for the AI Factory assessment is suitable for use at the R&D site.

Therefore, the plume rise related to the operation of the R&D Facility will be not represent a risk to aircraft flying above the height of nearby buildings.

If you have any questions please do not hesitate to contact the undersigned.

Kind regards,

Michael Burchill – Principal Consultant

Level 4, 154 Melbourne Street, South Brisbane
Queensland, 4101, Australia
ABN 21 680 559 095

www.katestone.global
Ph +61 7 3369 3699

Australian Government
Civil Aviation Safety Authority

Notification

Operational Assessment of a proposed plume rise

CASR 139.170(2)

Download this form before you begin

Please download and complete with Adobe Acrobat. If you're using a browser to complete this form you may lose your information. Send this form and any attachments to airspace.protection@casa.gov.au.

Purpose of this form

Use this form to provide details of plume rises from proposed developments to CASA.

Who is this form for?

This form is for proponents of a development that will generate an exhaust plume which may create a risk to the safety of aircraft operations. At the time of submitting this form whether there is a risk to the safety of aircraft operations may not be known. It is for CASA to determine such an outcome given all considered input which is to be assessed whether it may create a risk to the safety of aircraft operation.

For more information

Go to the CASA website or contact us.

Notifier

1 What are the **notifier** details?

Your contact details must be current. Update contact details via changing your details.

Legal entity/full name

Philip Smith

Phone number

0433 123 235

Email address

p.smith@avipro.com.au

Proposed facility and prior consultation

2 What are the **proposed facility** details?

Type of facility

Data centre

Location of the nearest town (direction and distance)

Devonport - approximately 3.9 nm brg 256°M

Location of the facility in latitude and longitude (degrees, minutes, seconds)

41° 10' 42" S, 146° 26' 52" E

Proximity to any other existing or planned facility that generates a plume rise (if known)

Nil

Distance to the nearest aerodrome or landing area including helicopter landing sites

YDPO ARP - 1,750 m brg 289°M (0.95 nm)

Height of the stack or tallest structure at the site Above Ground Level (AGL)

22.5 m

Elevation of the location of the facility Above Mean Sea Level (AMSL)

50 m

Date the facility will commence operation (DD/MM/YYYY)

14 / 02 / 2027

3 What are the parameters of the facility if a **single stack** is proposed?

Stack exit velocity (metres per second)

Stack exit temperature (degrees Celsius)

Stack diameter (metres)

Stack height (metres above ground level)

4 What are the parameters for the **worst case scenario** for facilities with **multiple configurations**?

Stack separation distance (metres)

1.8

Number of stacks

40

Stack exit velocity (metres per second)

86.3

Stack exit temperature (degrees Celsius)

500

Stack diameter (metres)

0.254

Stack height (metres above ground level)

10

5 What are the parameters for the **normal operating scenario** for facilities with **multiple configurations**?

Stack separation distance (metres)

2.2

Stack exit velocity (metres per second)

8.47

Stack exit temperature (degrees Celsius)

42.6

Stack diameter (metres)

2.13

Stack height (metres above ground level)

10

6 What are the details of any **prior consultation** with CASA, Dept of Defence, Aerodrome Operator or other relevant party?

Aerodrom operator consulted and advised of plans.

CASA has been advised of the proposed project site and impact on the OLS. No objection received for construction heights.

Specialist assessment undertaken by external contractor in accordance with AC139.E-02v1.1. Report attached to this application.

Additional documents

7 Please describe the content of any documents you are attaching to this notification including details of facilities with non-standard spacing and exhaust parameters. Please email any questions.

A report into the plume rise assessment was provided by Katestone Environmental Australia Pty Ltd. This report describes the assessment and results undertaken in accordance with AC139.E-02v1.1. The report concludes that the probability of aircraft being affected by moderate turbulence from the proposed chillers, coolers and emergency generators falls below the 1x10-5 threshold within 6 m of the plume release point and, therefore, is below the height of the existing buildings.

An assessment of an adjacent site has also been

Declaration

8 **I declare:**

- All statements in this notice are true and correct.

I acknowledge by providing my details below and submitting this notice:

- I may commit an offence under the *Criminal Code Act 1995* if I make a false or misleading statement in my notice.
- We may also use your licensing information in deidentified form for aviation safety research/analysis.

Privacy

Any personal information you provide to CASA, as part of this notice, is protected by the *Privacy Act 1988*.

We will use the information provided to process this notice and may also use it to conduct identity/security checks. Without your consent, we may not be able to process your notice.

Declaration continued

To meet our accountability obligations, we may disclose this information:

- to other government agencies or other national aviation authorities for certain purposes, and
- to comply with court orders and other legal requirements.

For more information about how we use, disclose and protect your personal information, see our privacy statement and privacy policy.

- I declare and acknowledge the above matters.
- I consent to CASA using my licensing information and other personal information for the above purposes.
- I have read CASA's privacy policy and I authorise CASA to use and disclose the information it collects for this notice in accordance with that policy.

Full name

Philip Shane Smith (ARN 223952)

Signature

Philip Smith

Digitally signed by Philip Smith
Date: 2026.09.29 11:40:17 +10'00'

Date (DD/MM/YYYY)

/ /

Role authority

9 In what capacity are you making this declaration?

- ☐ Self
- ☐ Director
- ☐ Agent
- ☑ Other, please specify:

Consultant for project.

An authority must be provided if the person making this declaration is **not** the individual or an office holder of the entity named in question 1.

Provide authority

Submitting this form to CASA

By email – attach this form and all supporting documents. Send them to airspace.protection@casa.gov.au

By post – return this form and all supporting documents to:

National Manager, ANAA
CASA, GPO Box 2005
Canberra ACT 2601

Electromagnetic Interference Assessment

Annexure E

pitt&sherry

Devonport Airport EMI Impact Assessment

Firmus Technologies Wesley Vale Data Centre

23 October 2026

Document History and Status

Revision	Date	Description	Author
A	23 October 2026	For Client Review	Dr. Rodney Urban

Executive Summary

Firmus Technologies plans to build a new AI Factory project at 226 Mill Road, Wesley Vale. The proposed site is located within an undeveloped area of the former Wesley Vale Pulp Mill landholding, which forms part of the Mill Park industrial precinct.

Devonport Airport is located to the Northwest of the proposed data centre site. The airport's terminal building and main East-West runway 06/24 are approximately 1.6 km and 1.3 km from the proposed site respectively.

This Electromagnetic Interference (EMI) assessment has been prepared to support the Development Application (DA) for the proposed data centre at 226 Mill Road. It addresses the potential impact of the proposed data centre on operations and system at Devonport Airport.

Various RF sensitive receivers were identified at Devonport Airport. These are associated with both aviation and ground operations at the airport.

It was demonstrated by conservative EMI analysis that the equipment proposed to be installed at the data centre, approximately 1.3 km from the airport, will not interfere with the identified sensitive receivers at the airport.

The EMI analysis was conservative and was not dependent on the specific equipment manufacturer or model types, nor did it constrain the location of the equipment within the data centre site. The EMI analysis was based on EMC test certification for the installed equipment, which is a mandatory ACMA requirement for products imported into or commercially available within Australia.

As such, no at-source EMI mitigation or control measures are required at the proposed data centre as there will be negligible EMI impact on the Devonport Airport operations and systems.

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Figure 1. The proposed location of the Firmus data centre and nearby facilities (aerial image from theList) 1

Acronyms and Abbreviations

Acronym	Definition
ACMA	Australian Communications and Media Authority
AI	Artificial Intelligence
AM	Amplitude Modulation
AS	Australian Standard
AWIS	Aerodrome Weather Information Service
CASA	Civil Aviation Safety Authority
CTAF	Common Traffic Advisory Frequency
DA	Development Application
EMI	Electromagnetic Interference
GNSS	Global Navigation Satellite System
GPS	Global Positioning System
ICAO	International Civil Aviation Organization
ILS	Instrument Landing System
PPM	Pulse Position Modulated
PAM	Pulse Amplitude Modulated
RF	Radio Frequency
RRL	Register of Radiocommunications Licences
SNR	Signal-to-Noise Ratio
SSR	Secondary Surveillance Radar
TCAS	Traffic Collision Avoidance System
UHF	Ultra High Frequency
VHF	Very High Frequency Wide Area
WAM	Wide Area Multilateration

1. Introduction

Firmus Technologies (Firmus) plans to build a new AI Factory project at 226 Mill Road, Wesley Vale. The proposed site, which is indicated in Figure *1*, is located within an undeveloped area of the former Wesley Vale Pulp Mill landholding, which forms part of the Mill Park industrial precinct. The industrial precinct serves primarily as a transport and logistics hub for a range of businesses.

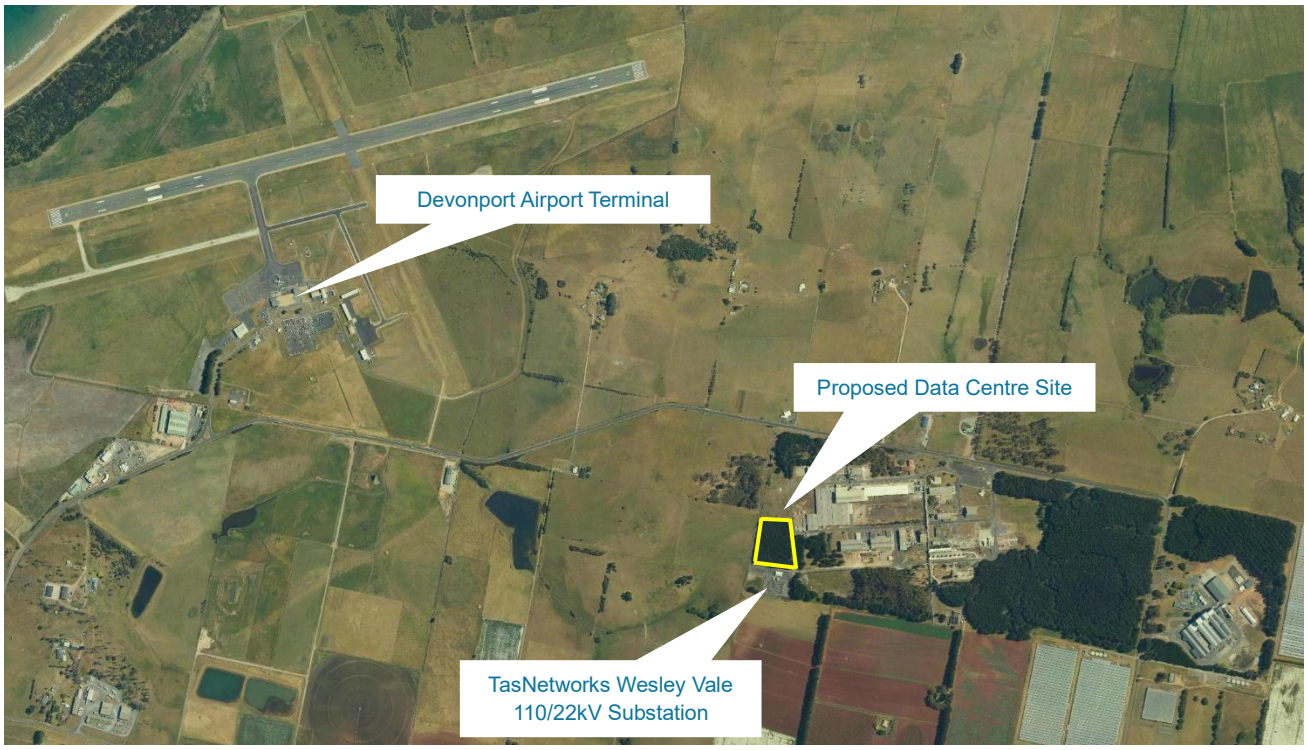


Figure 1. The proposed location of the Firmus data centre and nearby facilities (aerial image from theList)

Devonport Airport is located to the Northwest of the proposed data centre site. The airport's terminal building and main East-West runway 06/24 are approximately 1.6 km and 1.3 km from the proposed site respectively.

The Wesley Vale data centre will be delivered in two stages, an initial stage of approximately 26 MW, growing to maximum approximately 52 MW of capacity, comprising 23 MW for critical IT load in the initial stage and increasing to 46 MW in the ultimate stage.

Firmus is also planning to install 40 diesel backup generators at the site to cater for grid outages, testing and maintenance works.

This Electromagnetic Interference (EMI) assessment has been prepared to support the Development Application (DA) for the proposed data centre at 226 Mill Road. It addresses the potential impact of the proposed data centre on operations and system at Devonport Airport.

2. Scope of Study

The scope of works addressed in this EMI study comprises the identification of sensitive receivers at Devonport Airport, the assessment of potential EMI impacts from the proposed data centre on the identified sensitive receivers and the development of any mitigation and/or control measures that may be required to manage any identified EMI impacts.

The EMI assessments have been conducted in accordance with the standards and guidelines summarised in Table *1*.

Table 1. Standards and guidelines referenced in the EMI Study

Reference	Revision	Title
AS/NZS 61000.6.3	2021	Electromagnetic compatibility (EMC), Part 6.3: Generic standards - Emission standard for equipment in residential environments
AS/NZS 61000.6.4	2012	Electromagnetic compatibility (EMC), Part 6.4: Generic standards - Emission standard for industrial environments
AS/NZS CISPR 32	2015	Electromagnetic compatibility of multimedia equipment - Emission requirements
AC 139.E-01 & AC 175.E-02	2026	Civil Aviation Safety Authority Multi-Part Advisory Circular: Objects and structures that affect aviation safety
AC 21-53 v1.0	2015	Civil Aviation Safety Authority Advisory Circular: Electromagnetic compatibility
ICAO Annex 10	2007	International Civil Aviation Organization Annex 10 (Aeronautical Telecommunications), Volume III, Part II (Voice Communication Systems)

3. Study Inputs

The documents summarised in *Table 2* were provided as the basis of the EMI assessments documented in this study report.

Table 2. Input data sources referenced in the EMI Study

Reference	Revision	Title
DPO01-HDR-1500-00	1	Firmus Wesley Vale: Proposed Site Plan
4016-61TRG3	2017	Perkins ElectropaK 4000 Series Diesel Generator Data Sheet

3.1. Site Layout

A 3502 m^2 main building will be constructed on the site. It comprises a 2689 m^2 data hall that houses the server infrastructure and 793 m^2 of administration space. The building's primary roof height will be approximately 8.5 m, with rooftop plant, including 20 Smardt Evaporative Chillers and solar panels, increasing the maximum height to approximately 15 m.

The main building will be supported by electrical, cooling and water infrastructure. Two large electrical hardstand areas on either side of the main building will host up to 40 containerised Perkins ElectropaK 4000 Series emergency backup diesel generators.

A third hardstand area at the northern end of the site will host 20 outdoor JAEGGI Adiabatic Coolers.

3.2. Data Centre Equipment

The data centre's IT equipment (i.e., the AI servers, mainframes, accelerators, data storage devices, switches and routers) will be certified as compliant with EMI emission limits equivalent to the Class A (industrial) limits specified in AS/NZS CISPR 32.

Smardt evaporative-cooled chillers (e.g., the E-Class range) utilise variable-speed drives and electronic commutated fans that produce electronic switching noise emissions. They are tested to comply with EMI emission limits equivalent to those specified in AS/NZS 61000.6.4. Shielded cabling is installed to minimise EMI emissions.

The JAEGGI Adiabatic Coolers also utilise speed-controlled motor systems and are tested to comply with EMI emission limits equivalent to those specified in AS/NZS 61000.6.4. Shielded cabling is also installed to minimise EMI emissions.

The Perkins ElectropaK 4000 Series emergency backup diesel generators are tested to comply with EMI emission limits equivalent to those specified in AS/NZS 61000.6.4. The steel containers they are installed in will significantly reduce the EMI emission levels at the site boundary to well below the standard limits.

3.3. Power Supply

The proposed site is adjacent to the existing TasNetworks 110/22 kV Wesley Vale Substation. TasNetwork will initially provide 26 MW via a new 22 kV underground cable feeder. This will increase to 52 MW in the ultimate supply arrangement with the addition of a second underground cable feeder.

Onsite 22 kV switchgear and 22/0.4 kV transformers supply the server infrastructure and ancillary equipment.

3.4. Sensitive Receivers

Devonport Airport operates as a Common Traffic Advisory Frequency (CTAF) airport (i.e., non-towered). It does not have Instrument Landing System (ILS) infrastructure. Pilots utilise GNSS and GPS satellite communication in the L1 and L5/E5 bands for landing approaches, rather than legacy ground-based navigation aids.

Given the distance between the proposed data centre and Devonport Airport (i.e., > 1 km), the only likely form of interference to airport systems and flight operations would be in-band interference to airport and aircraft communication and radar systems.

A desktop review of all licensed Radio Frequency (RF) emissions was therefore conducted using the Australian Communications and Media Authority (ACMA) Register of Radiocommunications Licences (RRL). A summary of the identified sensitive receivers at Devonport Airport is provided in Table *3*.

Table 3. Summary of sensitive receivers identified at Devonport Airport

System	Centre Frequency (MHz)	Bandwidth (kHz)	Description
Common Traffic Advisory Frequency (CTAF)	122.3	25	Pilot communications
	126.9	25	Pilot communications
Wide Area Multilateration (WAM)	1030	19,000	Mode A/C/S transponder receiver
	1090	19,000	Traffic collision avoidance system interrogator
	120.7	25	VHF pilot-to-controller voice communication
AWIS	133.225	25	Aerodrome Weather Information Service
Ground Operations	450.1625	12.5	Qantas ground operations UHF communications
	131.65	25	Qantas ground-to-air VHF communications
	124.875	25	Rex Airlines ground operations VHF communications
TasNetworks communications network	10,775	40,000	X-band point-to-point microwave communications link
	11,265	40,000	X-band point-to-point microwave communications link
GNSS/GPS	1164-1215	various	Global navigation satellite system (GNSS) L5/E5 band
	1530-1559	various	Satellite communications
	1559-1610	various	GNSS L1 band

4. Assessment Criteria

ICAO Annex 10 (Aeronautical Telecommunications), Volume III, Part II (Voice Communication Systems) specifies a 15 dB Signal-to-Noise Ratio (SNR) for airband AM voice clarity.

The aviation VHF receivers are designed for a minimum acceptable signal strength at the edge of coverage of 20 µV/m, which equates to an absolute power level of -107 dBm at the receiver input.

To maintain the 15 dB minimum SNR under minimum receive signal conditions, the absolute in-band background EMI level must not exceed -122 dBm within the channel bandwidth. This absolute level of interference was therefore used as the assessment criterion for the EMI impact study.

5. EMI Analysis

The approach adopted for the initial EMI analysis was to consider the data centre equipment enclosure ports as efficient isotropic radiators (i.e., with a gain of 0dBi). For the most sensitive receivers at Devonport Airport, which are the VHF airband radio receivers that utilise AM modulation, the dimensions of the equipment are much smaller than that of the in-band signal wavelengths. The actual gain of the enclosure port as an unintentional emitter will be much smaller than 0 dBi, typically in the range -10 dBi to -30dBi.

The EMI propagation analysis also ignores the attenuation of the unintentional data centre Radio Frequency (RF) emissions by the conductive building materials of the main building and generator containers. It is only the roof-mounted chillers and the pad-mounted coolers that radiate RF fields into free space. The EMI calculations are therefore conservative.

The received power (P_r) in the sensitive receiver radio equipment at Devonport Airport was calculated using the Friis transmission equation:

$$P_r(dBm) = P_t(dBm) + G_t(dBi) + G_r(dBi) + 20LOG_{10}\left(\frac{4\pi R}{\lambda}\right) + 10LOG_{10}\left(\frac{BW_r}{BW_t}\right)$$

The transmit power P_t of the data centre equipment's enclosure port was assumed to be equal to the emission limit defined in the relevant EMC product standard, which is specified in Table *4*. The bandwidth (BW_t) of the measurement receiver specified in the EMC test standard is also specified in Table *4* for use in the EMI calculations.

As discussed previously, the equipment enclosure port was assumed to be an ideal isotropic radiator at all RF frequencies (i.e., $G_t = 0\ dBi$). The distance between the data centre and the closest receiver antenna at Devonport Airport was assumed to be $R = 1{,}600\ m$.

Table 4. EMI emission limits and test bandwidths for the data centre equipment

Equipment	Frequency Range (MHz)	Emission Limit (dBµV/m)	Test Receiver Bandwidth (kHz)
IT equipment (data hall)	30 – 230	40	120
	230 – 1,000	47	120
	1,000 – 3,000	56 (average)	1,000
	3,000 – 6,000	60 (average)	1,000
Smardt evaporative-cooled chillers & JAEGGI Adiabatic Coolers	30 – 230	40	120
	230 – 1,000	47	120
	1,000 – 3,000	56 (average)	1,000
	3,000 – 6,000	60 (average)	1,000
Perkins ElectropaK 4000 Series diesel generators	30 – 230	40	120
	230 – 1,000	47	120
	1,000 – 3,000	56 (average)	1,000
	3,000 – 6,000	60 (average)	1,000

The worst-case calculated in-band EMI levels at the Devonport Airport sensitive receivers are summarised in *Table 5*. The TasNetworks X-band point-to-point communication link at the airport was not considered in the EMI analysis because the data centre equipment is not within the main beamwidth of the receiver antenna and the data centre building structure does not penetrate the first Frensel zone of the transmission path. The data centre will therefore have negligible impact on the point-to-point communication link. Similarly, the industrial and IT equipment installed at the proposed data centre will not interfere with satellite-based communication channels of the aircrafts at the airport.

Table 5. Calculated EMI levels at sensitive receivers identified at Devonport Airport

System	Centre Frequency (MHz)	Radio Receiver Bandwidth (kHz)	Radio Antenna Gain (dBi)	Maximum possible EMI level (dBm)
Common Traffic Advisory Frequency (CTAF)	122.3	25	1	-128.9
	126.9	25	1	-129.2
Wide Area Multilateration (WAM)	1090	19,000	6	-117.7
	120.7	25	0	-129.7
AWIS	133.225	25	6.5	-124.1
Ground Operations	450.1625	12.5	4.5	-132.9
	131.65	25	4.5	-126.0
	124.875	25	4.5	-125.5

6. EMI Risk Assessment

The calculated received EMI power levels for the sensitive receivers at Devonport Airport, which are summarised in Table 5, are below the -122 dBm limit defined in Section 4 for the most sensitive VHF and UHF radio receivers at the airport. Furthermore, the analysis was conservative, in that it assumed the data centre equipment enclosure ports were efficient EMI radiators at the in-band RF frequencies of the sensitive receivers and the attenuation of the EMI by the metal building and container components was not considered in the analysis.

Only the received EMI level in the wideband Wide Area Multilateration (WAM) Traffic Collision Avoidance System (TCAS) interrogator receiver marginally exceeded the derived EMI limit, which was defined for airwave voice communication reception and not the Secondary Surveillance Radar (SSR) waveforms associated with the WAM system. Mode S downlink signals and ADS-B squitters are Pulse Position Modulated (PPM) and Mode A/C downlinks are Pulse Amplitude Modulated (PAM). The receiver is therefore less sensitive to the low-level EMI. Furthermore, the EMI analysis used the maximum gain value for the WAM antenna. The main lobe of the antenna is directed at an elevation of about 5°, which places the data centre building and roof-mounted equipment outside the antenna's main lobe. As such, the received EMI power will be below the conservative limit. Mitigation is therefore not required.

7. Conclusions

Various RF sensitive receivers were identified at Devonport Airport. These are associated with both aviation and ground operations at the airport.

It was demonstrated by conservative EMI analysis that the equipment proposed to be installed at the data centre, approximately 1.3 km from the airport, will not interfere with the identified sensitive receivers at the airport.

The EMI analysis was conservative and was not dependent on the specific equipment manufacturer or model types, nor did it constrain the location of the equipment within the data centre site. The EMI analysis was based on EMC test certification for the installed equipment, which is a mandatory ACMA requirement for products imported into or commercially available within Australia.

As such, no at-source EMI mitigation or control measures are required at the proposed data centre as there will be negligible EMI impact on the Devonport Airport operations and systems.

pitt&sherry

Wesley Vale Advanced Computing Infrastructure - Information provided for the purposes of section 60F of the Land Use Planning and Approvals Act 1993

khill@pittsh.com.au

Pitt & Sherry (Operations) Pty Ltd
ABN 67 140 184 309

Phone 1300 748 874
info@pittsh.com.au
pittsh.com.au

Located nationally —
Melbourne
Sydney
Brisbane
Hobart
Launceston
Newcastle
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