From: "Dominic Bradley" <Dominic.Bradley@wdrc.qld.gov.au>
Sent: Wed, 18 Nov 2026 07:28:04 +1000
To: "Records" <records@wdrc.qld.gov.au>
Subject: Applicant's response to the submissions - DA 030.2026.513.001 - 1933 Dalby-Kogan Road, Kogan - response to submissions
Attachments: LTR_P0067336_Response to Submissions_261116 (1).pdf

Hi records,

Please find the applicant's response to the submission received for DA 030.2026.513.001. Please let me know if you have any questions.

Kind Regards

Dominic Bradley
Principal Planner

Western Downs Regional Council embraces flexibility. If you receive an email from me outside normal business hours, please do not feel that you need to respond outside your normal working hours.

WESTERN DOWNS REGIONAL COUNCIL
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Version: 1, Version Date: 18/11/2026


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From: Matthew Brown <MBrown@urbis.com.au>
Sent: Tuesday, 17 November 2026 4:41 PM
To: Todd Summerville <Todd.Summerville@wdrc.qld.gov.au>; Dominic Bradley <Dominic.Bradley@wdrc.qld.gov.au>
Cc: cstanley <cstanley@urbis.com.au>; graham.pellow <graham.pellow@zerradc.com>
Subject: RE: 030.2026.513.001 - 1933 Dalby-Kogan Road, Kogan - response to submissions

Hi Todd and Dom

As discussed just now with Dom, there has been a an update to one section of the submissions response document to provide some further clarifty on timing for SIA and CBA requirements.

If possible, could this version replace the one sent through last night?

Thanks
Matt

Matthew Brown
Associate Director

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From: Matthew Brown
Sent: Monday, 16 November 2026 8:46 PM
To: Todd Summerville - WESTERN DOWNS REGIONAL COUNCIL (Todd.Summerville@wdrc.qld.gov.au)

<Todd.Summerville@wdrc.qld.gov.au>; Dominic Bradley (Dominic.Bradley@wdrc.qld.gov.au) <dominic.bradley@wdrc.qld.gov.au>
Cc: Cameron Stanley <CStanley@urbis.com.au>; Graham Pellow - AGPDC Global Holding Ltd (graham.pellow@zerradc.com) <graham.pellow@zerradc.com>
Subject: 030.2026.513.001 - 1933 Dalby-Kogan Road, Kogan - response to submissions

Good evening Todd and Dom

As discussed today, and following review by the project team, we are pleased to provide a detailed response to the submissions which were received for the development application.

The document includes a summary of the matters raised in the submissions, provides an outline of how the application material addresses the matters raised in the submissions and outlines potential conditions which WDRC may consider imposing to address matters raised in the submissions.

Cam and I are of course more than happy to continue to discuss this response to ensure that the proposed development appropriately addresses matters identified by WDRC as being relevant to the development application.

Kind regards
Matt

Matthew Brown
Associate Director

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Inspiring and creating solutions
for a changing world.

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16 November 2026

Todd Summerville and Dominic Bradley
Western Downs Regional Council

Via email: Todd.Summerville@wdrc.qld.gov.au and Dominic.Bradley@wdrc.qld.gov.au

Dear Todd and Dominic,

Response to submissions - Development Application at 1933 Dalby-Kogan Road, Kogan (WDRC ref: 030.2026.513.001)

1. Introduction

Urbis Ltd (Urbis) acts on behalf of *WDDP Pty Ltd* (the Applicant) in relation to the above development application (the Application) for a Development Permit for a Material Change of Use for a Research and Technology Industry (Data Centre), Workforce Accommodation and High Impact Industry (Concrete Batching Plant) at 1933 Dalby–Kogan Road, Kogan (formally described as Lot 125 on DY316) (referred herein as 'the site').

The Application was publicly notified in accordance with the *Planning Act 2016* (Planning Act) and the *Development Assessment Rules* (DA Rules). This letter responds to the matters raised in the properly made and other submissions received by Western Downs Regional Council (Council) and is provided to assist Council in its consideration of the submissions under section 45(5) of the Planning Act and in understanding how matters raised in the submissions have been and addressed the application material and in formulating any conditions of approval.

The purpose of this letter is to:

- summarise the submissions received and the key themes raised;
- respond to each theme, with reference to the technical reports lodged with the Application and the updated reports provided in response to Council's information request; and
- identify the conditions the Applicant would accept to address the matters raised, which are outlined in **Attachment A**.

Attachment B indexes the key themes to the submissions that raised them.

The Applicant acknowledges the time and care taken by members of the community, landholders and organisations in preparing submissions. A significant number of submissions raise reasonable matters regarding water, power, noise, roads, housing and the scale of the project, and the Applicant has sought to respond to these directly, to clarify the application material where required, and to offer conditions that make its commitments enforceable.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

1.1 Documents relied upon

This response draws on the following documents in Table 1 below.

Table 1 - Development Application documentation

Document	Author / date	Reference in this letter
Town Planning Report	Urbis, 25 August 2026	TPR
Architectural Drawings	HDR, 28 September 2026	Architectural Drawings
Landscape Concept Report	Urbis, 26 July 2026	Landscape Report
Infrastructure Services Report	HDR, 25 August 2026	ISR
Fire Safety Concept Strategy	CORE Engineering Group, 14 August 2026	FSCS
Waste Management Plan	Urbis, 17 August 2026	WMP
Economic Benefit Assessment	Urbis, July 2026	EBA
Noise Impact Assessment	ERM, 24 September 2026	NIA
Air Quality Assessment	ERM, 11 September 2026	AQA
Ecological Assessment Report	ERM, 18 September 2026	EAR
EPBC Act Self-Assessment	ERM, 28 July 2026	EPBC Report
Stormwater Management Plan	MCG Consult, 21 September 2026	SWMP
Traffic Impact Assessment	MCG Consult, 29 September 2026	TIA

2. Overview of submissions

A total of 627 submissions have been made relating to the Application, received between 16 September 2026 and 11 November 2026. Of these, 618 represent properly made submissions that were received during the public notification period between 22 October and 11 November 2026. The remaining nine (9) submissions (submissions 1–9) were received in September 2026, before the notification period.

Table 2 – Summary of submissions

Category	No. of items
Pro-forma submissions (online template)	436
Western Downs Says Pause form submissions (used or adapted)	144
Individually written submissions	47

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Total items	627
Duplicate items (same submitter lodging more than once)	29
Number of distinct submitters	598

Of the properly made submissions:

- two (2) support the Application (submissions 599 and 619), citing the suitability of the location adjacent to existing power stations and the substation, the use of land of limited agricultural value, and local employment and economic benefits;
- one (1) (submission 294) neither supports nor objects, but requests that any approval include measurable, evidence-based and publicly reported conditions; and
- the balance object to the Application or ask Council to defer its decision until further information is provided.

Approximately 37% of all submissions (229) came from the Western Downs and Darling Downs, within about 200 km of the site, with Dalby being the single largest source (77 submissions). Around one-third (203) came from South East Queensland, 81 from elsewhere in Queensland or interstate, and 114 (18%) did not provide an appropriate address. A large proportion of the pro-forma submissions were lodged from outside the region.

The key themes raised are summarised in **Table 3**. Given the two forms of submissions (i.e., Pro-forma and Western Downs Says Pause form) contain a standard set of grounds, reoccurring themes were identified in a large number of submissions.

Table 3 – Key Themes Raised in Submissions

Theme	Pro-forma	Says Pause form	Section
Process, missing information and Prescribed Project status	✓	✓	3.1
Process, missing information and Prescribed Project status	✓	✓	3.1
Project scale and inconsistencies in the application material		✓	3.2
Water supply, groundwater and the Great Artesian Basin	✓	✓	3.3
Coal seam gas (CSG) water, brine and wastewater	✓	✓	3.4
Electricity demand, power prices, on-site gas and battery operation	✓	✓	3.5
Greenhouse gas emissions and climate			3.6
Noise and low-frequency noise	✓	✓	3.7
Air quality and diesel generators	✓	✓	3.8

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Theme	Pro-forma	Says Pause form	Section
Diesel and fuel security		✓	3.9
Heat, microclimate and bushfire	✓		3.10
Traffic, roads and flood access		✓	3.11
Workers' accommodation, housing and social infrastructure		✓	3.12
Social impact assessment and community benefit	✓	✓	3.13
Jobs, local workforce and economic benefit	✓		3.14
Planning scheme, Rural zone, agricultural land and building height	✓	✓	3.15
Ecology, Kogan waxflower, koala, wetlands and EPBC			3.16
Hazardous materials, batteries, gas infrastructure and fire			3.17
Lighting and visual amenity			3.18
Decommissioning, e-waste and rehabilitation			3.19
Transparency, monitoring and enforceability of conditions			3.20
Aboriginal cultural heritage			3.21
Other matters	✓	✓	3.22

3. Response to matters raised

Each theme identified from the submissions is addressed below. For each theme, the matters raised are summarised, followed by the Applicant's response and the conditions proposed (numbered as in **Attachment A**).

3.1 Process, missing information and Prescribed Project status

Matters raised

Both forms of submissions, and many individual submissions, ask Council not to decide the Application until missing information is provided and the community has a further opportunity to comment. Many submitters oppose the Applicant's pursuit of Prescribed Project status under the *State Development and Public Works Organisation Act 1971* (SDPWO Act) and any use of Coordinator-General step-in powers, which they consider would remove Council's role and community appeal rights. Some submitters consider that assessment is premature given State and Commonwealth data centre regulation is not expected until 2027.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Response

Council is the assessment manager, and the Application is being assessed under the Planning Act. The Applicant has provided detailed development application plans and supporting reports, including reports which address noise, air quality, ecology, traffic and stormwater matters relevant to the application. This material provides clarification of how matters identified in the submissions have been dealt with through the development application material and provides potential conditions which WDRC may choose to impose that demonstrate the applicant's commitments to deliver the development in a responsible and lawful manner.

A Prescribed Project declaration does not itself change the assessment process, the assessment benchmarks, or the requirement to consider submissions. As explained in TPR, the Coordinator-General may only issue progression, decide or step-in notices in specific circumstances. Unless a notice is issued, Council remains the decision-maker. The purpose of the declaration is to coordinate State agency input and avoid unreasonable delay for a project of State significance, not to bypass local assessment procedures under the legislative planning framework.

In relation to concerns regarding prematurity, Council, and potentially the Office of the Coordinator General must assess the Application against the planning instruments in force at the time of the decision.

Where specific matters are identified as requiring further design resolution, the Applicant proposes that these be secured by conditions requiring the relevant plans and reports to be approved by WDRC. This is a common and lawful approach for major projects and ensures Applicants are committed to delivering certain outcomes at the appropriate time when final equipment selections will be made.

3.2 Project scale and inconsistencies in the application material

Matters raised

Submitters (including the Says Pause form, 38, 86, 153 and 290) identified inconsistencies in the application material, including references to six buildings or two further halls, different floor areas, IT load (1.44 GW) compared with facility demand (2,160 MVA), daily energy figures, and job numbers. Several submitters were concerned that the approval could allow a larger development than assessed by Council.

Response

To provide clarification, the Applicant confirms that the Application seeks approval for:

- four (4) stages, each comprising approximately 27,604 m² of data hall floor space;
- a maximum total facility electrical demand of approximately 2,160 MVA (four (4) buildings at approximately 540 MVA each), which includes the IT load of approximately 1.44 GW together with cooling, power conversion, losses and redundancy;
- ancillary substations, switching stations, battery-backed power conditioning systems and emergency diesel generators; and
- Workforce Accommodation for up to 1,500 construction workers.

The references to 'six data centre buildings' and 'Ranges Bridge' in the FSCS (section 3.1), three (3) stages in the ISR (section 4.1), and 195,000 m² of floorspace in the EBA arise from earlier iterations of

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

the master plan and have since been superseded. No approval is sought for a fifth or sixth building or for any additional data halls.

3.3 Water supply, groundwater and the Great Artesian Basin

Matters raised

Water was the most frequently raised matter in the submissions. Particular matters raised include where the water would be sourced, whether groundwater or the Great Artesian Basin (GAB) would be used, how stock and domestic bores would be protected, how drought would be managed, and how many water tankers would be required.

Response

The data centre uses air-cooled chillers with closed-loop liquid cooling. It does not use evaporative cooling towers and has no ongoing water demand for cooling during normal operation. Water is required for:

- **construction and the workers' village** – approximately 322 kL/day at peak (270 kL/day potable, 52 kL/day non-potable), plus up to about 200 kL/day of non-potable water for dust suppression during construction;
- **one-off commissioning of each building's closed-loop cooling system** – approximately 26.9 ML per building, or about 107.6 ML across all four buildings over the construction program. The water for the closed-loop cooling will be sourced as outlined the Water Management Plan as follows:
  - CSG processed water and onsite recycled water as the primary construction-phase water sources.
  - rainwater harvesting and onsite recycled water as the primary operational water source.
  - out of region water cartage for potable water and CSG processed water as emergency contingent supplies.
  - scaled site infrastructure (1ML) for water capture and storage.
  - potable water treatment infrastructure.
  - modular membrane bioreactor (MBR) wastewater treatment for onsite sewage treatment.
  - Separation of potable and non-potable water distribution with prioritisation of onsite recycled water for non-potable needs.
  - offsite management of treatment residuals where required; and
- **operation** – approximately 16.5 kL/day per completed building (about 66 kL/day for all four buildings) for staff amenities and irrigation.

The development application identifies a supply hierarchy that prioritises treated CSG produced water during construction and rainwater harvesting during operation, supported by potable water cartage, staged storage and recycled water from on-site wastewater treatment. The Applicant acknowledges submitters' concern that this strategy is not yet finalised and that there was a reference to bores and surface water as possible options in the early stages of the DA process. The applicant confirms that water will not be obtained from these sources.

To provide certainty, the Applicant is prepared to accept relevant and reasonable conditions of approval to commit that:

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

- no groundwater, including from the Western Downs Region will be taken for the development, other than utilisation of treated water from CSG sources in accordance with agreements reached between the applicant and parties with rights to distribute this water;
- no water-based (evaporative) cooling will be used for heat rejection;
- before each stage commences, the Water Management Plan will be updated, confirming the actual sources, contracts and entitlements, drought contingency, storage, tanker volumes and routes.

With respect to rainwater, the SWMP provides 60 kL of rainwater storage per stage. The Applicant accepts that rainwater alone will not meet operational demand in dry periods, and the Water Management Plan will identify the reliable supplementary source (for example, carted or recycled water) needed to meet demand in a drought.

3.4 Coal seam gas water, brine and wastewater

Matters raised

Submitters raised the following concerns regarding coal seam gas (CSG) water, brine and wastewater:

- CSG produced water could contaminate soil and groundwater, and there is uncertainty regarding its salinity and acidity, as well as the responsible personnel for its supply;
- Uncertainty regarding how brine and treatment residues would be managed;
- Brine ponds were not addressed in the stormwater assessment and concerns were raised regarding the drainage line that passes near a proposed pond location.
- CSG water is taken from stock and domestic aquifers that are relied on by surrounding landholders.

Response

Treated CSG water is proposed only as a construction-phase source and would be obtained from a licensed CSG operator that already treats produced water under its own environmental authority and beneficial use approvals. The Applicant does not propose to treat raw CSG water on the Site, and no additional brine or evaporation ponds form part of this Application.

To address the concerns raised, the Applicant accepts reasonable and relevant conditions of (refer to **Attachment A**), which requires that any CSG-derived water be treated to a quality fit for its intended use, be supplied under the supplier's approvals, be tested, and not be applied to land unless it meets the relevant standards; and that no brine or concentrate be generated, stored or disposed of on the site.

Wastewater from the workers' village and operations will initially be removed by a licensed contractor and later treated in an on-site membrane bioreactor plant, with recycled water reused. Stormwater will be managed to achieve no worsening of downstream peak flows up to the 1% AEP event.

3.5 Electricity demand, power prices, on-site gas and battery operation

Matters raised

Many submissions raised the scale of electricity demand and its potential to increase power prices for households and farmers, or to require new fossil-fuel generation. Submissions also questioned

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

the source of supply for each stage, the reference in the ISR to a gas well on the site and a gas supply contingency for Stage 1, whether the battery system will be used for energy arbitrage, and who will pay for network connection.

Response

The site was selected because it adjoins one of Queensland's largest concentrations of generation and transmission infrastructure, including the Braemar 1 and 2 and Darling Downs power stations, the Darling Downs Solar Farm and Powerlink's Braemar 275 kV and 330 kV substations. Connection to the transmission network is subject to the National Electricity Rules and Powerlink's connection agreement (which has been obtained by the applicant, under which the connecting customer funds its own connection assets. The development is not connected to local distribution network (other than a temporary 33 kV supply to the workers' village).

With respect to the matters raised regarding the gas well, the Applicant acknowledges the existence of the gas wells and associated infrastructure on the site. Notably, the operational requirements of the gas wells were carefully considered as part of the design process from the start of the project. As a result, the design incorporates an exclusion zone with a radius of 150 m to ensure each gas well is appropriately protected. This exclusion zone was informed by technical reporting and will be subject to approval from the owners of the assets. The layout of the proposed development has been designed to ensure ongoing unrestricted access is provided to the gas wells. Importantly, the proposed development has been carefully considered to not constrain ongoing operations or prejudice existing infrastructure associated with the gas wells, consistent with the Western Downs Planning Scheme's strategic intent to protect resource infrastructure from encroachment by incompatible land uses.

Electricity market pricing, generation planning and network cost recovery are regulated by AEMO, the Australian Energy Regulator and the Queensland Government, rather than through the planning scheme. However, the Applicant recognises community concern on this matter and is prepared to accept the following proposed conditions of approval:

- condition confirming that no electricity generation is approved on the Site other than the emergency backup diesel generators and the ancillary battery-backed power conditioning systems shown on the architectural plans, and that any gas-fired generation (including use of an on-site gas well) would require a separate development approval; and
- condition confirming that the battery systems are ancillary to the development, are not connected to the electricity grid and limited to the capacity shown on the approved plans.

3.6 Greenhouse gas emissions and climate

Matters raised

A number of individual submissions raised the greenhouse gas emissions associated with the electricity consumed, which is estimated by some submitters at several million tonnes of CO^2 per year, and the absence of a greenhouse gas assessment.

Response

The Western Downs Planning Scheme does not contain an assessment benchmark for greenhouse gas emissions from purchased electricity, and the emissions intensity of grid electricity is a matter for State and Commonwealth energy and climate policy, including the National Greenhouse and Energy Reporting scheme, which will apply to the facility at the relevant thresholds. Direct on-site emissions are limited to periodic testing of the backup diesel generators (approximately 2.5 hours per generator per year) and emergency operation. Given the nature of the development, this is a reasonable operation requirement.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Overall Outcome 12 of the Rural Zone Code seeks ecological sustainability through energy efficiency. The use of air-cooled, closed-loop cooling avoids the large water demand of evaporative systems, and the battery-backed power conditioning system allows the development to present a stable load to the network.

3.7 Noise and low-frequency noise

Matters raised

Submissions raise that the noise assessment predicts exceedances of the noise criteria outlined in the Environmental (Noise) Protection Policy 2019, and that a 24-hour operation would affect the quiet rural environment. Submitters raised concerns that compliance should be achieved at the receptors rather than through treatment of dwellings, and that all operating scenarios be assessed.

Response

The NIA (V006) recommends project criteria derived from the very low existing background levels: LAeq 34 dB(A) day, 30 dB(A) evening and 31 dB(A) night at all sensitive receptors (NIA Executive Summary). These are amongst the most stringent criteria applied to industrial development in Queensland.

The Applicant acknowledges that, without mitigation, the NIA predicts exceedances of up to 13 dB(A) at sensitive receptors under normal operation. With the mitigation incorporated and required to be incorporated into the development through the approval of the acoustic report (chiller fan attenuators, horizontal baffles, compressor enclosures and 10m noise walls around the battery and transformer compounds), predicted night-time exceedances reduce to up to 6 dB(A) at SR1 (owned by the Site landowner), 5 dB(A) at SR2, 3 dB(A) at SR3 and 6 dB(A) at the Workers' Village, with compliance at SR4. It is noted however that the acoustic levels are not the outcomes which are being approved, and instead, the proposed conditions in **Attachment A** require the acoustic mitigation measures to be complete to enable these acoustic levels to be completed. It is anticipated that conditions will be imposed requiring that acoustic certification be provided to WDRC prior to the commencement of use of each stage.

The Applicant acknowledges that whilst the development is located within the Rural Zone, the Strategic Framework of the Planning Scheme identifies that the site is located within the Kogan East Special Industry Area and therefore there is considered to be a reasonable expectation that development which is located within this designation allows for land uses which would have a greater impact on amenity outcomes that other parts of the Rural Zone. This reflects the adjacency of the Braemar No. 1 and No. 2 and Drawling Downs gas fired power stations, along with the Powerlink transmission substation. The development itself, being predominantly a Research and Technology Industry land use results in a lower level of amenity impacts when compared to other land uses which could be located within this area.

The Applicant proposes to adopt the following conditions of approval detailed in **Attachment A** to ensure appropriate noise criteria is achieved:

- condition– operational noise limits comply with the recommendations for mitigation of acoustic impacts as outlined in the Acoustic Design Report;
- condition–compliance monitoring to ensure that the recommendations of the Acoustic Design Report have been achieved;
- condition– generator testing limited to 9:00 am – 5:00 pm on weekdays, with no more than two generators tested at once; AND

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

- condition– acoustic design of the Workers' Village to achieve suitable internal noise levels within the units.

The NIA notes that genuine emergency operation of generators following a grid outage is generally exempt from operational criteria. Emergency operation is expected to be rare, as the battery backup power conditioning systems provide the initial backup supply and the generators serve only network rooms and lift safety services.

3.8 Air quality and diesel generators

Matters raised

Submitters noted that the AQA predicts nitrogen dioxide (NO_2) levels nearly twice the air quality objective at the workers' accommodation under emergency operation, with additional concerns regarding the dust from construction and the concrete batching plant, and odour from decommissioning the feedlot effluent ponds.

Response

The updated AQA (V04) predicts that, during routine operation (including routine generator testing which will occur infrequently), all pollutants comply with the air quality objectives at all off-site receptors and at the Workers' Village. Under a conservative emergency scenario, in which all 20 generators run at full load concurrently for an unrestricted period, the AQA predicts a marginal exceedance of the 1-hour NO_2 objective at the nearest off-site receptor, and a 99.9th percentile 1-hour NO_2 concentration of 301.2 µg/m³ at the Workers' Village against a criterion of 164 µg/m³ (AQA Executive Summary).

This scenario assumes a catastrophic failure of the 330 kV electrical supply and continuous full-load operation, which is unlikely given the N+1 transmission redundancy and the battery systems that provide the first line of backup. The Applicant accepts that compliance should be demonstrated for all credible scenarios. ERM identifies that compliance is likely to be achieved through generator selection and taller exhaust stacks (AQA section 7). Accordingly, the Applicant is willing to accept reasonable and relevant conditions of approval. Proposed conditions requires updated dispersion modelling demonstrating compliance for routine and emergency scenarios at all receptors, including the Workers' Village, to be demonstration to Council.

Construction dust, concrete batching and odour from decommissioning the effluent ponds will be managed under a Construction Environmental Management Plan, including watering, stabilisation of disturbed areas, enclosed transfers and filtration at the batching plant, and staged removal of pond material.

3.9 Diesel and fuel security

Matters raised

submissions noted that around 186,000 L of diesel would be stored for 20 generators, that construction diesel use has not been estimated, and that the development could compete with farmers, freight and emergency services during a fuel shortage.

Response

The 186,336 L of diesel is stored in the generators' integral belly tanks to allow each generator to run for up to 24 hours in an emergency (TPR section 6.4.1; AQA section 2.2). This diesel storage represents a standing reserve rather than a continuous consumption. Routine consumption is limited to approximately 50 generator-hours of testing per year across the development. Construction fuel will be procured commercially through normal supply chains, similar to other major construction projects in the region.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

The Applicant agrees that the facility should not draw on local fuel supply during a declared grid emergency, other than for genuine emergency backup power. Diesel storage will comply with AS 1940 and dangerous goods requirements and the Emergency Response Plan will address fuel resupply arrangements in consultation with the Local Disaster Management Group.

3.10 Heat, microclimate and bushfire risk

Matters raised

Submissions raised concern that heat rejected by air-cooled chillers could create a local 'heat island' (submitters cite figures of 2–10°C), increase fire risk near Kumbarilla and Dalby State Forests, and affect crops, livestock, pollinators and wildlife. Submission 616 suggested that the waste heat could be reused.

Response

Air-cooled data centres reject heat to the atmosphere through chillers, as do many other industrial and commercial facilities. The heat is discharged vertically by chiller fans and dissipates rapidly with height and distance. The data halls are set back approximately 950 m from Dalby–Kogan Road and are centrally located within a 725-ha site, with substantial separation to adjoining properties and state forest.

The Applicant acknowledges that the application material does not include a quantitative assessment of the thermal plume, and that figures quoted by submitters are drawn from studies of other facilities in different settings. To respond to this concern, the Applicant proposes a condition of approval that requires the preparation of a thermal plume and microclimate assessment for Stage 1A, considering near-field air temperature changes at the site boundary and adjoining vegetation.

The site is partly mapped as Medium Potential Bushfire Intensity (TPR Table 7) however there is no built form in any of these areas. As part of post-approval process, the Applicant is willing to accept a condition of approval that requires the preparation of a Bushfire Management Plan in consultation with QFD, including asset protection zones, vegetation management in buffers, access and firefighting water. The Landscape Report incorporates maintenance and fire-protection buffers around buildings.

3.11 Traffic, roads and access

Matters raised

Submissions raised concerns regarding the volume of construction traffic (around 430 movements per day, including 230 heavy vehicles), damage to local roads in wet weather, the condition and gazettal of Grahams Road, flood closures of Ranges Bridge and Daandine Bridge, water tanker movements, and who will pay for road upgrades and maintenance.

Response

The Traffic, Transport and Access Assessment (summarised in TPR section 6.1) estimates peak construction traffic of approximately 430 vehicle movements per day (200 light and 230 heavy, including concrete batching deliveries), reducing to approximately 120 movements per day during operation. Dalby–Kogan Road is a State-controlled road forming part of the B-double and PBS Level 3A network. Grahams Road is not currently gazetted for B-double or Higher Mass Limit vehicles.

The Applicant will be required to construct access upgrades identified in the assessment – an auxiliary left turn (short) and basic right turn treatment at Dalby–Kogan Road, and basic left and right turn treatments at Grahams Road (TPR section 6.1.1). Further, the Applicant is prepared to accept conditions of approval proposed as follows:

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

- construction of the access upgrades before construction traffic exceeds an agreed threshold and before the use commences;
- a Construction Traffic Management Plan, prepared in consultation with Council and DTMR, addressing haul routes, heavy-vehicle hours, water tanker movements, flood contingency access when Ranges Bridge or Daandine Bridge is closed, operational management and bus-in/bus-out transport for the workforce;
- pre-construction and periodic dilapidation surveys of roads, with the Applicant responsible for rectifying damage attributable to the development, secured through an infrastructure agreement with Council; and
- upgrade of Grahams Road to the standard required before it is used by B-double or HML vehicles.

3.12 Workers' accommodation, housing and social infrastructure

Matters raised

Submissions are concerned about the effect of a 1,500-person construction workforce and up to 1,400 operational jobs on Dalby's rental market, housing supply, health and emergency services, and the availability of tradespeople – drawing on the experience of the CSG construction boom when rents rose sharply. Submitters queried whether the workers' village is temporary or permanent and where operational staff will live.

Response

The Applicant accepts that housing and workforce availability are legitimate concerns for the Western Downs. The on-site Workforce Accommodation (up to 1,500 beds) is proposed specifically so that the construction workforce is not housed in Dalby, Kogan or Chinchilla. The village includes indoor and outdoor recreation and amenities, and workers will be transported by bus (TPR sections 1.2 and 6.1.2).

A Housing Strategy and a Social Impact Assessment are being prepared in collaboration with Council and the State Government to address the housing needs of the permanent workforce (TPR section 5.4.4). The Applicant accepts the imposition conditions of approval, requiring:

- the Workforce Accommodation to be used only by persons engaged in the construction of the development, with a maximum of 1,500 beds and an operational management plan addressing health and medical services, security, transport and community relations; and
- the Housing Strategy and Social Impact Assessment will be finalised in consultation with Council and the State submitted before the commencement of Stage 1 operation, including the timing and delivery pathway for operational workforce housing.

3.13 Social impact assessment and community benefit

Matters raised

Submissions asked for an independent cumulative social impact assessment (SIA) and a binding community benefit agreement (CBA). Submitters noted that the classification of the battery systems as 'ancillary' meant the Queensland SIA and CBA framework for large-scale energy projects was not triggered.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Response

The Queensland SIA and CBA requirements introduced in 2025 apply to specified large-scale renewable energy development (such as wind and solar farms) under the *Planning Regulation 2017* and do not currently apply to data centre developments. Nevertheless, the Applicant recognises the scale of the project and its potential social effects and has commenced development of a SIA and a CBA framework which will be worked through and agreed over the coming months. The Applicant accepts the following could be adopted as conditions which secures a robust process of SIA which will inform the execution of a CBA between the applicant and WDRC:

- The applicant commits to the preparation of a Social Impact Assessment (SIA) which will be lodged with WDRC within 6 months of a development approval for the project taking effect.
- The findings of the SIA, along with other relevant matters, which will inform a Community Benefit Agreement (CBA) which will entered into between both parties;
- The CBA will be consistent with WDRC's established *Community Partnering Framework*. The applicant and WDRC commit to finalising the CBA within 9 months of a development approval which has taken effect.

3.14 Jobs, local workforce and economic benefit

Matters raised

Submissions questioned the job estimates (approximately 1,500 construction jobs and 1,400 ongoing jobs), noting inconsistencies with other documents and that the estimates are not enforceable. The submitters queried how many jobs would go to local people, whether the region could become an 'economic enclave' with benefits flowing to external contractors and investors, and whether the project would draw tradespeople away from local businesses and homeowners. Supporting submissions (submissions 599 and 619) highlighted the economic benefits.

Response

The EBA estimates approximately 1,500 direct construction jobs (and 2,120 indirect jobs per year of construction) and approximately 1,400 direct ongoing jobs at full capacity (with a further 2,100 indirect jobs), with an estimated $760 million in annual gross value added to the Queensland economy. The direct job figures are provided by the project team and the indirect effects are modelled using REMPLAN (EBA section 2).

The Applicant agrees that local benefit should be measurable, with the project targeting the employment of Western Downs residents, apprentices and trainees, and local procurement. The Applicant will also work with tertiary institution and schools on skills pathways.

3.15 Planning scheme, Rural zone, agricultural land and building height

Matters raised

Submission contend the following matters:

- the proposal conflicts with the Rural zone and the Strategic Framework (including Element 3.3.9) of the Western Downs Planning Scheme;
- a data centre is not a 'Research and Technology Industry';
- overriding community need has not been demonstrated;
- the land is within a Priority Agricultural Area; and

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

- the buildings exceed the height limit.

Response

The TPR (sections 4 and 5) acknowledges that the proposal is not wholly consistent with the purpose of the Rural zone and does not comply with Overall Outcomes 1, 4 and 6 of the Rural Zone Code. However, the site is within the Kogan East Special Industry Area identified on Strategic Plan Map 1, which takes precedence over the Rural zone under the hierarchy of the planning scheme. The Strategic Framework (Element 3.3.9, Specific Outcome 4 and Land Use Strategy 6) and Rural Zone Code Overall Outcome 8 direct industrial uses requiring separation from sensitive uses to this area. The site adjoins major power stations, a solar farm, substations, gas processing facilities and the Dalmore Resources mine, and is not a typical rural setting.

The Research and Technology Industry definition includes the use of premises for an innovative or emerging industry that involves storing, maintaining or testing machinery or equipment, which appropriately describes a data centre. Where Council takes a different view of the definition, the use remains impact assessable and the same assessment procedures and benchmarks apply.

Overriding need is addressed in TPR section 5.4, including the State's limited data centre capacity relative to other states (EBA section 1.3), and the site-specific attributes that cannot be replicated on industrial zoned land – direct access to 275 kV and 330 kV transmission infrastructure and a landholding large enough to provide separation. The site is predominantly cleared land that has been used for a feedlot, effluent irrigation and gas wells, and the development footprint (approximately 168 ha – EAR section 1) occupies less than a quarter of the landholding.

While it is acknowledged the highest most point of the roof ridge reaches 12.08 m and exceeds the 10 m acceptable outcome by approximately 2.08 m, the buildings have a height measured to the roof line of approximately 9.2 m (Architectural Drawings). The buildings are set back approximately 950 m from Dalby–Kogan Road and are screened by existing roadside vegetation, which is proposed to be supplemented by the landscape buffers as detailed in the Landscape Report to further reduce views.

The proposed require the development to be carried out in accordance with the approved architectural plans and Landscape Report, which ensures the built form and landscaping outcomes remain consistent with the approval granted by Council.

3.16 Ecology, Kogan waxflower, koala, wetlands and EPBC Act

Matters raised

Submitters raised concerns regarding the presence of the endangered Kogan waxflower, koala habitat along Grahams Road, wetlands, the adequacy of the June 2026 surveys, cumulative habitat loss, and the potential effects of lighting and noise on fauna and pollinators.

Response

The updated EAR (18 September 2026) confirms that the development footprint (approximately 168.1 ha) is located almost entirely within previously disturbed, non-remnant land. The Kogan waxflower was recorded along the western boundary and Grahams Road corridor, noting the proposed development footprint avoids all individual plants but affects approximately 0.2 ha of supporting habitat, which will require a Protected Plant Clearing Permit under the *Nature Conservation Act 1992* (EAR section 7 and Conclusion). The mapped wetlands are constructed feedlot and farm water storages, rather than natural wetlands. ERM concludes that no Significant Residual Impact on any MSES is likely, and the EPBC Self-Assessment concludes that a significant impact on any Matter of National Environmental Significance is unlikely.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Relevant conditions are proposed to address the limited environmental impacts of the proposed development.

3.17 Hazardous materials, batteries, gas infrastructure and fire

Matters raised

Submitters raised concerns related to the storage of diesel, approximately 3.75 ML of transformer oil and large lithium-ion battery systems next to high-pressure gas pipelines and gas wells, the absence of a fire safety study or quantitative risk assessment, the capacity of local fire services, firewater contamination, and national security.

Response

The FSCS identifies the principal hazards as diesel in generator belly tanks (Class C1), lithium-ion batteries in Integrated Power Units (Class 9) and transformer oil (not a dangerous good). Batteries are not located within the data halls. The FSCS requires UL9540A-tested batteries showing no module-to-module propagation, two-hour fire-rated compartments, enhanced pre-action sprinklers, off-gas detection that trips the affected battery sector, emergency ventilation, and a dedicated firewater containment tank of approximately 500,000 L so that contaminated runoff does not leave the Site (FSCS section 4.4). Dedicated fire water storage of 2 × 700,000 L, with a further 2 × 700,000 L of backup storage, is provided because there is no reticulated supply (ISR section 4.4).

The existing high-pressure gas pipelines and QGC gas wells and gathering lines are incorporated into the master plan, and the Application has been referred to APT Petroleum Pipelines Pty Ltd and Powerlink as referral agencies (TPR section 3.2). The Applicant proposes conditions requiring:

- a Fire Engineering Report and fire safety systems developed in consultation with QFD before building work;
- an Emergency Response Plan covering battery fire, bushfire, pipeline incidents and fuel resupply, provided to QFD and the Western Downs Local Disaster Management Group, with on-site emergency power isolation points accessible to emergency services;
- a safety management study under AS 2885 for works near high-pressure pipelines, and the written agreement of each pipeline and well operator before works within their easements or setbacks;
- a Bushfire Management Plan; and
- bunded dangerous goods storage and a dangerous goods manifest held at the fire indicator panel.

National security and cyber security of critical infrastructure are regulated by the Commonwealth under the *Security of Critical Infrastructure Act 2018* and are not matters for planning assessment.

3.18 Lighting and visual amenity

Matters raised

Submissions raised light spill and loss of the dark night sky, and views from nearby properties, including an east-facing ridge 15 km to the west.

Response

All external luminaires are specified with 0% upward light output ratio and are certified as Australian Dark Sky compliant (TPR section 6.9). Buildings are set back approximately 950 m from Dalby–Kogan Road and screened by existing vegetation, and new native landscape buffers are proposed. The Applicant is willing to accept relevant and reasonable conditions of approval requiring lighting

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

to comply with AS/NZS 4282 and the External Lighting Assessment, with no upward light spill as detailed in proposed conditions in **Attachment A**.

3.19 Decommissioning, e-waste and rehabilitation

Matters raised

Submissions queried what will occur to the site at the end of the project, how the frequent replacement of computing equipment will be managed, and whether a bond should be required.

Response

The WMP identifies electronic waste as a separate waste stream to be managed through licensed recyclers. The Applicant provides the following commitments under the proposed conditions of approval as detailed in **Attachment A**:

- requires a Decommissioning and Rehabilitation Plan before the commencement of Stage 1A operation, providing for removal of above-ground infrastructure and rehabilitation of the site to a condition suitable for rural use if the use ceases for more than 12 months;
- requires all decommissioned IT equipment to be reused or recycled through licensed e-waste facilities and reported annually; and
- requires the Workforce Accommodation to be removed at the completion of construction.

3.20 Transparency, monitoring and enforceability of conditions

Matters raised

Submitters raised concerns about information at community information sessions, a short notification period, the enforceability of commitments, and a need for independent monitoring and public reporting.

Response

The public notification period was carried out in accordance with the required timeframe prescribed under the Planning Act. Further, it is acknowledged that the Planning Act does not require community information sessions. Rather, this was undertaken by the Applicant to increase community awareness.

The Applicant agrees that its commitments should be transparent and verifiable. It proposes a condition, requiring a publicly available annual compliance report against every condition (including a machine-readable conditions schedule, monitoring results and aerial imagery), requiring a community liaison process, a 24-hour complaints contact, complaints register and defined response times.

3.21 Aboriginal cultural heritage

Matters raised

Submissions raised matters regarding cultural heritage investigations and consultation with indigenous groups.

Response

The Applicant has a duty of care under the *Aboriginal Cultural Heritage Act 2003*. It is acknowledged that the development application is not subject to assessment against the Aboriginal Cultural Heritage Act 2003, and this matter is managed separately to the development assessment process. The Applicant has been actively engaging with The Barunggam People, being the traditional owners.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

There is a Cultural Heritage Management Plan in place over the site. With the assistance of the traditional owners the Applicant has undertaken a site wide archaeological survey to identify items and areas of cultural significance.

3.22 Other matters

Matters raised

Submissions raise concerns about artificial intelligence generally – its safety, effect on employment and society, and the absence of binding national safeguards – and request that any approval require an emergency shutdown capable of being activated by public authorities independently of the operator.

Response

While the Applicant acknowledges the matters raised regarding AI safety, emergency shutdown and national regulation, the regulation of artificial intelligence, its uses and its social effects is a matter for Commonwealth policy and law and is not an assessment benchmark under the Western Downs Planning Scheme or a matter that Council can lawfully regulate through a development approval. A development approval regulates the use of land and the physical effects of a development; however, it cannot regulate the content of computing undertaken within a building.

The planning-relevant aspect of this concern relating to AI safety is the ability of emergency services to isolate power to the facility in an emergency. The Applicant is prepared to accept relevant and reasonable conditions of approval requiring clearly identified emergency power isolation points, accessible to QFD and other emergency services, to be documented in the Emergency Response Plan and provided to the Local Disaster Management Group. In addition, the Applicant is committed to ensuring the development remains compliant with any national or State data centre standards as they come into force, to the extent they apply.

In terms of matters raised about ownership, foreign investment approval and taxation, it is noted these are regulated by the Commonwealth and are not relevant considerations under the Planning Act.

4. Conclusion

The submissions raise a wide range of matters relating to the scale of the project and its interaction with water, energy, roads and housing in the Western Downs. In responding, the Applicant has:

- confirmed the scope of the Application (four (4) buildings, 2,160 MVA maximum demand and 1,500 accommodation beds) and identified the superseded references in the application material;
- clarified the water strategy and committed to no groundwater take (other than utilisation of treated water from CSG sources in accordance with agreements reached between the applicant and parties with rights to distribute this water), no evaporative cooling and an approved Water Supply Management Plan before each stage;
- acknowledged the predicted noise and NO_2 exceedances and proposed conditions requiring compliance to be demonstrated, approved and verified at each stage;

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

- proposed conditions addressing traffic and road damage, workforce accommodation and housing, social impact, local employment, ecology, hazards, emergency isolation, decommissioning, and public reporting.

The Applicant considers that, subject to the potential conditions in **Attachment A**, the matters raised in the submissions can be appropriately addressed and the development can be approved. The Applicant would welcome the opportunity to meet with Council officers to discuss the proposed conditions.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Should you have any questions, please contact the undersigned or Matthew Brown from Urbis.

Yours sincerely,



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CC: Office of the Coordinator General - Kerry Smeltzer, Melissa Nicholls and Katherine Chuan

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Attachment A – Potential conditions

The following conditions are proposed by the Applicant to address matters raised in submissions. They are drafted in summary form to assist Council in preparing its conditions package, and the Applicant would welcome discussion with Council officers on their final wording. Conditions relating to matters marked for client confirmation in the letter are subject to the Applicant's final instructions.

	Theme	Condition	Timing
C1	General	The development must be carried out generally in accordance with the approved plans and documents.	At all times
C2	Water	Prepare and implement the Water Management Plan, including any changes to the proposed water sources, supply contracts and entitlements; as outlined in the approved Water Management Plan.	At all times
C3	Water	Heat rejection must be by air-cooled and closed-loop systems only. Evaporative or other consumptive water-based cooling is not permitted.	At all times
C4	Water	No groundwater (including from the Great Artesian Basin) may be taken for the development, other than utilisation of treated water from CSG sources in accordance with agreements reached between the applicant and parties with rights to distribute this water.	At all times
C5	Water	Any coal seam gas derived water used on the Site must be supplied and treated by a licensed operator under its approvals, be fit for its intended use.	At all times
C6	Wastewater	Wastewater must be removed by a licensed contractor until an on-site treatment plant is approved and commissioned. Treated effluent reuse must be located outside all environmentally sensitive areas.	Construction and operation
C7	Energy	No electricity generation is approved on the site other than emergency backup diesel generators and the ancillary battery-backed power conditioning systems shown on the approved plans. Any gas-fired generation requires separate approval.	At all times

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

	Theme	Condition	Timing
C8	Energy	The battery-backed power conditioning systems must be ancillary to the development.	At all times
C9	Noise	Operational noise (LAeq,adj,1hr) is required to be managed in accordance with the acoustic mitigation measures outlined in the Acoustic Design Report.	At all times
C10	Noise	Submit an Acoustic Design Report for each stage, based on manufacturer sound power data and including tonal and low-frequency noise assessment, demonstrating compliance with C9, for Council approval.	Before building work for each stage
C11	Noise / air	Routine generator testing is limited to 9:00 am – 5:00 pm Monday to Friday (excluding public holidays), with no more than two generators operating at any one time.	Operation
C12	Noise	Workforce Accommodation buildings must be acoustically designed to achieve suitable internal noise levels, as demonstrated in an acoustic report.	Before occupation of the village
C13	Noise	Prepare and implement a Construction Noise and Vibration Management Plan. Where construction works are proposed to exceed the hours specified in the *Environmental Project Act 1994*, submit the proposed construction hour to Western Down Regional Council for approval, and undertake community engagement at least 2 weeks prior to works commencing.	Before construction
C14	Air	Submit air dispersion modelling, based on the selected generators and stack design, demonstrating compliance with the Environmental Protection (Air) Policy 2019 objectives at all sensitive receptors, including the Workforce Accommodation, for routine and emergency scenarios.	Before operation of each stage
C15	Hazard / air	Diesel must be stored in accordance with AS 1940 within bunded or integral tanks, and only ultra-low sulphur diesel may be used in the generators.	At all times

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

	Theme	Condition	Timing
C16	Traffic	Prepare and implement a Construction Traffic Management Plan, in consultation with Council,, addressing haul routes, heavy-vehicle hours, avoidance of school bus times, water tanker movements, flood contingency access, and workforce bus transport.	Before commencement of site works.
C17	Traffic	Undertake pre-construction and periodic dilapidation surveys of Council-controlled roads and rectify damage attributable to the development at the Applicant's cost, secured by an infrastructure agreement with Council.	Before construction and ongoing
C18	Traffic	Grahams Road must be upgraded in consultation with Western Downs Regional Council	Within 6 six months of commencement of construction.
C19	Accommodation	The Workforce Accommodation may only be occupied by persons engaged in the construction of the development (maximum 1,500), must operate under an approved Accommodation Management Plan, and must be removed and the area rehabilitated within 12 months of the completion of the final stage of construction unless otherwise approved.	Following the completion of stage 4.
C20	Housing, Social Impact and Community Benefits	Finalise and submit for approval of the Western Downs Regional Council, a Community Benefit Agreement, Housing Strategy and Social Impact Assessment.	Within 6 months of the development approval taking affect for the SIA, and within 9 months of the development approval taking effect for the CBA.
C21	Accommodation	Provide on-site first aid and medical services for the Workforce Accommodation, and emergency arrangements agreed with Queensland Health and QAS.	Prior to commencement of site works.

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

	Theme	Condition	Timing
C22	Ecology	Prepare and implement a Vegetation Management Plan, including marked clearing limits, pre-clearance surveys and a qualified fauna spotter-catcher during clearing.	Prior to commencement of site works.
C23	Ecology	Install exclusion fencing around Kogan waxflower supporting habitat outside the approved development footprint.	Prior to commencement of site works.
C24	Ecology / stormwater	Prepare and implement an Erosion and Sediment Control Plan to IECA guidelines and maintain buffers to waterbodies and drainage lines.	Prior to commencement of site works.
C25	Lighting / visual	External lighting must comply with AS/NZS 4282 and the External Lighting Assessment, with 0% upward light output ratio. Landscape buffers must be established in accordance with the Landscape Concept Report.	Prior to commencement of use for each stage.
C26	Hazard	Prepare a Fire Engineering Report, in consultation with QFD, and provide fire safety systems including UL9540A-tested batteries, fire-rated battery compartments, off-gas detection, and firewater containment of at least 500,000 L.	Prior to commencement of building works for each stage.
C27	Hazard / emergency	Prepare and implement an Emergency Response Plan addressing battery fire, bushfire, pipeline incidents and fuel resupply, including clearly identified emergency power isolation points accessible to emergency services. Provide the plan to QFD and the Western Downs Local Disaster Management Group.	Prior to commencement of use for each stage
C28	Hazard	Prepare and implement a Bushfire Management Plan, including asset protection zones and firefighting access and water, in consultation with QFD.	Prior to commencement of use for each stage

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

	Theme	Condition	Timing
C29	Hazard	Store dangerous goods in accordance with the Work Health and Safety Regulation 2011 and relevant Australian Standards, and keep a current manifest at the fire indicator panel.	At all times
C30	Waste	All decommissioned IT and electrical equipment must be reused or recycled through licensed e-waste facilities, with volumes reported annually.	At all times
C31	Community	Establish a community liaison process, a 24-hour complaints contact, and a complaints register, with responses within defined timeframes; make complaint summaries available to Council.	At all times
C32	Stormwater	Implement the approved Stormwater Management Plan, including detention basins, water quality treatment and maintenance, to achieve no worsening of downstream peak flows up to the 1% AEP event.	Prior to commencement of use for each stage

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Attachment B - Index of themes and submissions

This table demonstrates, for each theme, whether it is raised in the pro-forma submission (436 items) and the Western Downs Says Pause form submission (144 items), and lists the individually written submissions (and personalised additions) that raise it.

Theme	Section	Pro-forma	Says Pause	Individual submissions
Process, missing information, Prescribed Project	3.1	✓	✓	8, 11, 38, 72, 83, 86, 89, 94, 153, 290, 347, 450, 581, 594
Project scale and inconsistencies in the application material	3.2		✓	4, 8, 11, 38, 86, 95, 146
Water supply, groundwater and GAB	3.3	✓	✓	3, 4, 5, 6, 7, 8, 9, 11, 34, 59, 72, 78, 82, 83, 86, 88, 89, 90, 94, 95, 137, 146, 153, 290, 294, 310, 347, 450, 452, 468, 558, 563, 564, 581, 591, 612, 613, 616
CSG water, brine and wastewater	3.4	✓	✓	34, 72, 82, 83, 94, 95, 146, 153, 290, 310, 347, 581, 613
Electricity demand and power prices	3.5	✓	✓	3, 4, 6, 7, 11, 22, 34, 38, 72, 78, 83, 86, 90, 94, 95, 137, 146, 153, 290, 347, 452, 558, 563, 564, 581, 594, 616, 619, 624
Greenhouse gas emissions and climate	3.6			3, 8, 72, 78, 86, 90, 95, 146, 153, 290, 594
Noise and low-frequency noise	3.7	✓	✓	3, 4, 5, 8, 9, 11, 72, 78, 82, 83, 88, 89, 90, 94, 146, 153, 290, 294, 310, 450, 558, 564, 581, 612
Air quality and diesel generators	3.8	✓	✓	11, 34, 83, 94, 153, 558, 581
Diesel and fuel security	3.9		✓	1, 11, 34, 78, 83, 90, 153, 594
Heat, microclimate and bushfire	3.10	✓		4, 5, 72, 78, 82, 146, 310, 347, 581, 612, 613, 616

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026

Theme	Section	Pro-forma	Says Pause	Individual submissions
Traffic, roads and flood access	3.11		✓	4, 6, 9, 11, 34, 72, 82, 83, 88, 89, 90, 94, 153, 290, 294, 310, 450, 452, 558, 563, 591, 612, 613
Workers' accommodation and housing	3.12		✓	4, 11, 22, 34, 72, 78, 83, 86, 90, 95, 146, 153, 290, 294, 452, 455, 558, 563, 591, 594, 612, 613, 616
Social impact and community benefit	3.13	✓	✓	1, 8, 11, 86, 90, 94, 290, 347, 581, 594
Jobs and economic benefit	3.14	✓		8, 11, 34, 38, 72, 86, 90, 95, 146, 290, 310, 347, 452, 591, 612, 613, 616, 619
Planning scheme, Rural zone and height	3.15	✓	✓	9, 11, 72, 83, 94, 153, 290, 310, 563, 581, 594, 612
Ecology and EPBC	3.16			8, 9, 59, 78, 82, 88, 89, 90, 95, 153, 294, 310, 450, 558, 594, 612, 613
Hazards, batteries and gas infrastructure	3.17			1, 6, 9, 11, 82, 83, 86, 90, 94, 95, 153, 310, 558, 613, 619
Lighting and visual amenity	3.18			1, 9, 59, 82, 88, 89, 90, 310, 450, 558, 564
Decommissioning and e-waste	3.19			8, 22, 563, 564, 613, 616
Transparency and enforceability	3.20			6, 11, 34, 59, 78, 82, 86, 90, 95, 153, 290, 294, 310, 450, 558, 612, 613, 624
Aboriginal cultural heritage	3.21			59, 95, 581, 624
Other matters	3.22	✓	✓	1, 3, 5, 8, 11, 22, 34, 59, 78, 83, 86, 90, 94, 146, 290, 310, 347, 455, 558, 563, 613

Document Set ID: 5850628
Version: 1, Version Date: 18/11/2026