



Your ref: SSD-33781208  
File no: MC-22-00004

8 August 2022

NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

By email: [patrick.copas@planning.nsw.gov.au](mailto:patrick.copas@planning.nsw.gov.au)

**Attention: Patrick Copas**

Dear Mr Copas

**SSD-33781208 - Notification of exhibition of a State Significant Development Application for the Station Road Data Centre expansion located at 57 Station Road, Seven Hills**

Thank you for your correspondence dated 11 July 2022 requesting our comments on the above State Significant Development proposal.

The applicant's Environmental Impact Assessment and supporting documents have been reviewed by Council officers and we object to the proposal in its current form. Council officers have indicated that a number of issues need to be addressed as outlined in the attachment to this letter.

Council therefore requests that these matters be comprehensively addressed and returned back to Council for further comment and consideration before any determination of this application is made by the Department.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment on 9839 6228.

Yours faithfully

Peter Conroy  
Director City Planning and Development

**Connect - Create - Celebrate**

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

# Blacktown City Council's submission to SSD-33781208

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## 1. Planning

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- a. To reduce urban heat generation from the development, full compliance with the landscaping provisions prescribed by Section 4.2 of Blacktown Development Control Plan 2015. In this regard, a tree is to be provided every 10m in the proposed car parking area. Displaced car parking spaces are to be provided elsewhere on site.
- b. The approved single storey data centre with a gross floor area of 630 m<sup>2</sup> at the front of the site fully complied with the Blacktown Development Control Plan 2015 industrial car parking rates. 16 car parking spaces were provided. In contrast, this double storey data centre with a gross floor area of 8076 m<sup>2</sup> only proposes 15 additional car parking spaces. If you subtract the circulation, amenity, plant and storage areas from the gross floor area calculation, it would result in the following applicable industry and office gross floor areas:

- Industrial: 5325 m<sup>2</sup>
- Office: 545 m<sup>2</sup>

Based on these gross floor areas, the Blacktown Development Control Plan 2015 car parking rates would require the following number of car parking spaces:

- Industrial portion: 71
- Office portion: 14

A total of 85 additional car parking spaces are therefore required. The 15 car parking spaces proposed therefore represents a significant shortfall of 60 parking spaces. This significant departure is not acceptable. Whilst it is acknowledged that the predicted staff numbers for the data centre will not demand all 85 parking spaces, the building's use could change at any time in the future to a use that does demand them all.

- c. Provide solar panels on the roof of the proposed building as sustainable development principles are encouraged.

## 2. Environmental Health

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- a. The Acoustic Assessment Report prepared by PWNA, dated 3 June 2022 does not consider worst case scenario/emergency operation scenario (operation of all 8 generators at 100% capacity). It also does not consider the cumulative impacts, such as that from the already approved data centre.
- b. The Review of Contaminated Land Reports: 57 Station Road, Seven Hills, prepared by Martens & Associates, dated 12 May 2021 is dated over 12 months old. Further testing was recommended post demolition of onsite structures. If remediation has now been completed, provide the data gap assessment and the validation report.

- c. The Air Quality Impact Report, prepared by Benbow Environmental, dated June 2022 must consider the cumulative impacts from the operation of the proposed data centre and the already approved data centre. For instance, the running of 12 generators at 100% capacity (emergency scenario).

Furthermore, high background levels of nitrogen oxides, carbon monoxide and dust meant it was not possible to demonstrate 'no additional exceedances'. It is likely that in certain circumstances the development will cause additional exceedances. Further assessment must be carried out to address this matter.

### **3. Social Planning**

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- a. The proposed mitigations of potential negative impacts during the construction and future operation of the development require a plan of management to be submitted. This should include an overview of:
- locality with map,
  - hours of operation,
  - staffing ratios,
  - noise management plan,
  - complaints handling,
  - communication with surrounding properties and wider community,
  - security,
  - emergency management.
- b. Plans and other relevant documents must demonstrate how crime prevention measures are included in the design and management of the proposed development.
- c. Provide additional information to confirm:
- how the proposed development will meet the sustainability requirements of a State Significant Development,
  - how the design and management strategies will contribute to state wide and local government emissions / carbon budget targets set for Blacktown City,
  - if the development includes roof top solar panels and adequate provision will be made for electric vehicles.

### **4. Drainage**

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- a. A Model for Urban Stormwater Improvement Conceptualisation and DRAINS model need to be provided to Council in a digital format for further assessment.