



Your ref: SSD-41589232
File no: MC-23-00001

24 February 2023

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

Recipient Delivery shaun.williams@planning.nsw.gov.au

Attention: Shaun Williams

Dear Mr Williams

SSD-41589232 – 51 Huntingwood Drive Data Centre

Thank you for your correspondence dated 19 January 2023 requesting our advice on the proposed Data Centre at 51 Huntingwood Drive, Huntingwood which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we object to the proposal until all our issues listed in the Attachment to this letter are addressed in a revised Environmental Impact Statement and the information required is referred back to Council for reconsideration before any determination is made of this Development Application by the Department.

The notification radius should have been a minimum of 2 to 2.5 kilometres due to the impacts on skyline and views from surrounding suburbs. Please confirm the radius of properties notified?

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

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Blacktown Council's submission to SSD-41589232 – 51 Huntingwood Drive Data Centre

1. City Architect issues

- a. The applicant should put forward an alternate option for the façade treatment. The development is of great significance, its height and bulk greatly exceeds that of neighbouring development, which although industrial, are of a different scale. The façade of the building has the opportunity to create something special and expressive for the precinct. The applicant has had discussions previously with Bill Tsakalos, Councils City Architect in this regard. It is unfortunate that those discussions did not eventuate into alternate design solutions that showcases the scale and technology of the facility through the application of colour and appropriate materials.
- b. Tree planting to the full perimeter of the site should be provided.
- c. Rooftop plant should be positioned below the façade datum/parapet for it to be screened.

2. Planning issues

- a. Council's primary concern is the bulk, scale and height of the proposed data centre. The proposed data centre height ranges from 43.25 to 49.76 metres and is proposed on a high point within the area, which proposes a finished floor level for majority of the data centre being FFL 84.0. Consequently, the development will have serious adverse impacts on the surrounding skyline and views due to its bulk and scale. The data centre must be redesigned in a manner to reduce the visual and amenity impacts on the surrounding residential areas and from nearby streets including M4 motorway.

Note: The neighbouring Arnott's high bay warehouse (DA-18-00883) to the west is 34 meters in height with the roof height sitting at RFL 94.85. The proposed data centre height at the top of plant will be at RL 127.25, which is more than 32 metres higher than the neighbouring high bay warehouse.

- b. Due to the bulk and scale of the development 2,131 trees are proposed to be removed. The proposal plans to retain 129 trees and replant 291 trees. This is not a satisfactory outcome for the amenity, streetscape or in context of Western Sydney's climate.
 - The proposed hardstand covers more than 80% of the site, leaving less than 20% landscaping.
 - The pre-lodgement minutes required for tree replacement. A general rule being for every tree removed 2 replacement trees should be provided.
 - More deep-soil landscaping to cater for large, shade providing trees must be provided.

- c. The proponent must address urban heat in the context of Western Sydney's climate. In this regard:
- it must be demonstrated that the roof of the data centre and associated buildings will utilise high albedo and high emittance roofing materials in accordance with Blacktown City Council's Responding to Climate Change Strategy (<https://www.blacktown.nsw.gov.au/About-Council/What-we-do/Environmental-Plans-and-Policies#section-2>).
 - internal roads and hardstand surfaces must also utilise high albedo and high emittance colours and materials.
 - additional tree planting can be provided around the car parking areas.
- d. Rooftop plant is not satisfactorily screened, please refer to City Architects point 1 c. above.
- e. Screening for the proposed data centre, water tanks, pump room and substation is not satisfactory:
- Tiered landscaping should be included within the retaining walls along the M4 motorway setback. The landscape area must be wide enough/capable of accommodating large trees to assist in screening the water tanks, pump room substation.
 - The finish on the galvanised steel water tank should be reconsidered to make the tanks less imposing on the landscape, particularly from M4 motorway perspective.
- f. Extensive earthworks are proposed on the site with fill up 10 metres in locations resulting in large retaining walls, specifically on the south-western boundary.
- The FFL of the centre should be dropped to reduce the overall bulk of the centre and decrease the impact on views in the area.
 - Please clarify the amount of cut, fill and balance. The EIS refers to different figures throughout the document. Is filled being taken from site, or is additional fill required?
 - The earthworks are contributing to our concerns around extensive bulk and scale of the building by creating a large flat pad on top of a hill.
- g. The proposal has not satisfactorily addressed Council's concerns with car parking. Council requested in the pre-lodgement minutes that a 'strategy and a plan showing how such a building could be flexible/adaptable to cater for long term possible future change of use' be provided. The applicant must provide a strategy and plan with future options.

Please clarify the following in relation to car parking:

- Section 6.6.6 of the EIS refers to 145 car spaces compared to the Traffic and Parking Assessment, under section 5.1.2 referring to 137 car space. How many car spaces are proposed?

- The EIS refers varying numbers of jobs/staff on-site from 274-276 compared to the Traffic and Parking Assessment, under section 4.1 refers to up to 250 staff. How many staff are proposed to work on-site? Confirm the number of staff that will be on-site at any one time and at changeover of shifts?

Once the matters above are addressed Council will determine if the amount of car parking will be sufficient.

- h. The applicant must provide amended shadow diagrams which refers to the winter solstice, the plans provided refer to the summer solstice. Council will consider the shadow impacts in more detail once the amended plans are provided.
- i. The applicant must provide a survey plan with legible survey points.

3. Drainage

The Drainage team cannot support the application due to the non-compliances with Part J of Blacktown DCP 2015, these issues include:

- a. Catchment: Part of the subject site is located within an OSD exemption zone in accordance with the part J of Blacktown DCP 2015. The applicant has proposed catchment C as the exempted areas, but it is not consistent with Council's OSD map. The applicant must demonstrate catchment C is same/similar to the exemption area in accordance with Blacktown Council's OSD Map.
- b. Non-potable water demand:
 - In the submitted MUSIC model, the 80% non-potable demand cannot be achieved. The proposed demand rates in the model do not match the actual development.

The daily demand shall be calculated based on the number of toilets proposed in the development in accordance with Council WSUD Developer Handbook 2020. However, the daily demand is calculated by 10 staff in the report when the development is accommodating more than 250 staff in the submitted Traffic and Transport Assessment report.

- An irrigation demand is related to landscape area which excludes turf areas. For instance, some turf areas near to the carpark within catchment C can be excluded in the irrigation demand calculation. It helps to achieve the 80% non-potable demand.

The applicant must amend the design and the demand rates to achieve the 80 % non-potable demand.

- c. On site stormwater detention system:

- For underground tank A, the overflow weirs and connections between the rainwater tank, the OSD tank and the filter chamber must be shown on the drawing clearly. The detailed design of the filter chamber must be provided. The required design details can be found on Council's WSUD standard drawing A(BS)175M.

- The height of proposed basin B is over 2 metres, safe access for the basin shall be designed to ensure the accessibility and maintenance of the basin.
- d. Water quality control:
- Two filter chambers are proposed within catchment B and C to capture and treat the surface water in the catchments. The detailed design of the chamber must be provided in the submission.
 - 40 Stormsacks are proposed in the submitted MUSIC model. However, they have not been shown in the submitted plan. The Stormsack's details and the typical section must be included in the submitted plan.

4. Biodiversity issues

- a. Council notes the bulk and scale of the proposal which involves removal of over 2000 trees, across 2.6 hectares of vegetation. The post build low proportion of deep soils throughout the Site has poor outcomes for urban design, quality of landscaping, visual impacts of the development, urban microclimate and biodiversity.
- b. Council suggests the applicant produce a Biodiversity Management Plan (BMP) inclusive of the mitigation measures set out in Table 5.4 of the Biodiversity Development Assessment Report by Travers Bushfire and Ecology dated 7th Sept 2022 and listed within Section 6.11.2 of the EIS by Willow Planning 30th Sept 2022. The BMP should also include the requirement for an ecologist or licenced wildlife handler and arborist to be present prior to works commencing for overseeing the erection of tree protection fencing and fauna handling during tree clearance.
- c. Council also suggests that the Stormwater management cycle and strategy are appropriately implemented to ensure water quality and pollution reduction targets are achieved across the site
- d. Natural Areas suggests that the Landscape Plan by Geoscapes dated 05 Sept 2022 be amended to include some replacement individuals of *Eucalyptus scoparia* and *Syzygium paniculatum*, which are listed as threatened species under the *BC Act*. Additional native trees should also be planted in the native groundcover areas shown in SSD-05, to provide shade, further reduce the urban heat island effect and provide a micro-climate to support development of the ground cover layer. If this impedes on planned lines of sight for security, consider installing more cameras. Also consider using some species of trees that have been removed from the site and utilising sod relocation in native revegetation areas, taking the sod from areas of high-quality native ground layer vegetation proposed to be cleared.
- e. Council suggest that the Construction Environment Management Plan also cover Construction Traffic Management; Construction Noise Management; Unexpected finds procedures for threatened species; and Community Consultation and Complaints Handling. The Construction Environment Management Plan must be provided for consideration at assessment stage, once the plan is satisfactory compliance with this can be conditioned.