In reply please quote: 23/16013 **Contact**: Mosheur Rahman on (02) 9725 0850

19 April 2024

Industry Assessments
NSW Department of Planning, Housing, and Infrastructure (DPHI)
GPO Box 39
SYDNEY NSW 2000

Dear Mr Williams,

SSD-59416728 – PROPOSED DATA CENTRE AT 3 DAVIS ROAD, WETHERILL PARK (Lot 1 DP 864615)

Fairfield City Council is in receipt of the abovementioned State significant development (SSD) application at 3 Davis Road, Wetherill Park. The Environmental Impact Statement (EIS) is currently on public exhibition. Council officers appreciate the opportunity to provide comments on such a significant development within Fairfield Local Government Area.

It is understood the proposal is for construction and operation of two data centre buildings and associated infrastructure. The proposed development seeks consent for the following:

- Minor earthworks involving cut and fill works;
- Infrastructure comprising civil works and utilities servicing;
- Removal of 322 trees, retention of 74 trees, and planting of new trees;
- Construction of two (2) data centre buildings, both to be three (3) storeys in height, each comprising:
    - 19,551m^2 of gross floor area (GFA);
    - 3 data halls;
    - 33 back up generators;
    - With a power consumption of 80 megawatts (MW) (each with approximately 66MW IT load);
- Construction of one (1) tape library building, two (2) storeys in height comprising:
    - 466m^2 of GFA;
    - 2 data halls;
    - 1 back up generator;
    - With a power consumption of 0.85 MW (approximately 430-kilowatt (kW) IT load);
- Construction of one (1) sally port with 46m^2 of GFA;
- Diesel storage capacity of 1,383 kilo litres (kL);
- High Voltage Substation (HVSS) incorporating three 90 Mega Volt Amp (MVA) 132/22 kilovolt (kV) transformers and associated switching and control buildings;
- 101 on-site car parking spaces;

- 33,710m^2 of complementary landscaping; and
- Hours of operation being on a 24 hours per day, 7 days per week basis.

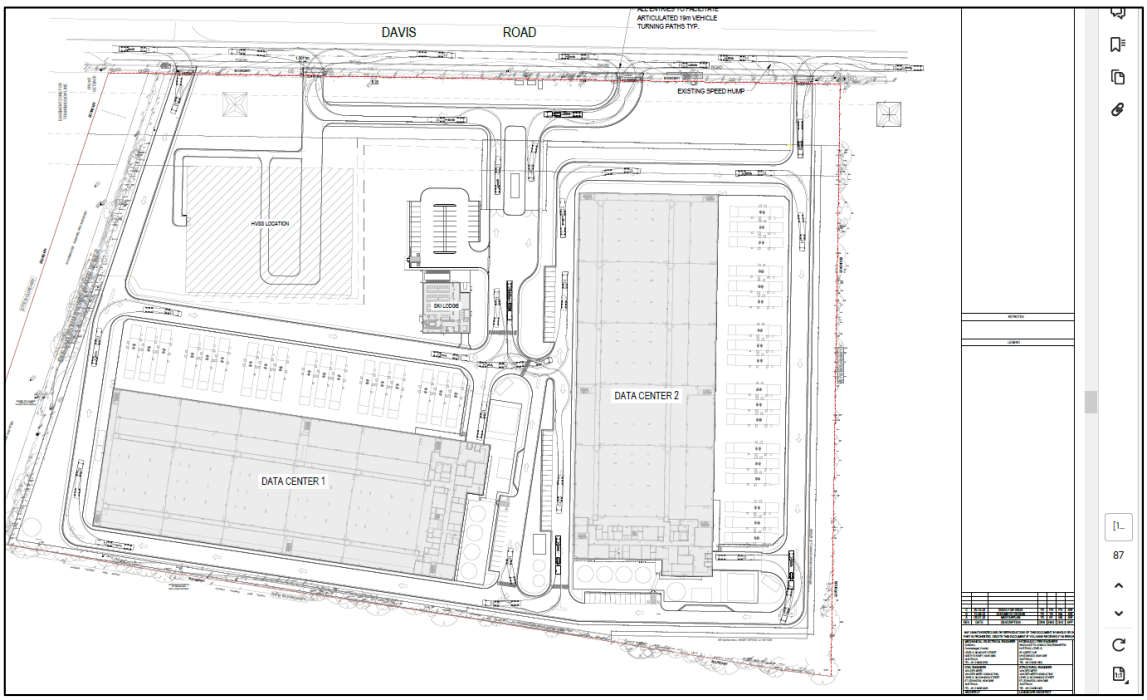
Council officers have reviewed the EIS and the supporting technical reports. The following review of the EIS either provides comments or requests further as part of Council Officers consideration of the proposal.

A. Traffic related matters

Driveway crossover:

1. The design of vehicular access for a development site should comply with the requirements of relevant Australian Standards (AS/NZS 2890.1:2004 and AS 2890.2:2018). In this instance, the applicant shall refer to Figure 3.1 of AS 2890.2:2018 for the minimum design for an access driveway on a minor road catering for heavy rigid vehicles (HRVs) and articulated vehicles (AVs). It should be noted that the minimum width of driveway for HRVs or AVs should be 12.5m and corresponding dimensions for the MRV and SRV are 9m and 6m respectively. Additional information shall be provided regarding this matter.

2. The existing property has a single wide driveway divided entry and exit with median. The proposed development has four driveways for a single lot. Note that it will create number of conflicting movements on roads and loss of on-street parking space. The specific need for these driveway access points will need to be adequately addressed by the proponent. Refer to page 39 of EIS Appendix 19 Civil Engineering report, Drawing No. CDL-00-00L-DR-C-2300, Revision C, 20.10.2023:



3. The Vehicle crossings are mostly compliant with Council's Vehicular Crossings policy; however, the main access is not perpendicular in the council road reserve. Council officers recommend that the main access be adjusted to be perpendicular in the road reserve.

4. The applicant is responsible for the design, construction and maintenance of vehicular crossings which are required to comply with Council's Vehicular Crossing Policy, Public Domain Manual and Standards and Specifications. For further information regarding the application process for a new driveway please refer to the link provided – Vehicular Crossings Fairfield City Council

5. Vertical alignment of each driveway needs to be checked at the detailed design stage to avoid vehicles scraping when entering and exiting the building.

6. The applicant is proposing to construct temporary vehicle access and then reinstate it to standard kerb and gutter. The temporary vehicle crossing be conditioned to be removed prior to use of the development. Redundant lay back is to be replaced with standard kerb and gutter with the provision of appropriate lintel opening and silt trap for the existing grated gully pit. After reconstruction of the kerb and gutter, the road surface shall be reinstated to Council's standards and specifications.

Vehicles manoeuvring:

1. The applicant's swept path diagrams have indicated while the temporary vehicle access along Davis Road is in place, the largest vehicle (19m articulated vehicle) can satisfactorily turn into and out of the driveway without being impacted by vehicles parking on Davis Road. The applicant has not demonstrated how a 19m articulated vehicle can still satisfactorily manoeuvre into, within and out of the site when the temporary vehicular access is no longer available.

2. The applicant shall provide a breakdown of the types of heavy vehicles accessing the site (for examples, 8.8m medium rigid vehicles, 12.5m heavy rigid vehicles, 19m semi-trailers and 700T Mobile Crane) on hourly basis through the day to Council for assessment. This is to ensure that vehicles servicing/using the site will be managed in a way that they will not affect traffic circulation within the site and/or to cause vehicles queuing onto the external road network. The information provided by the applicant shall be accompanied with the survey data of similar developments with similar operating characteristics.

Parking:

It is reasonable for unique land uses to estimate parking demand using first principles and that it should be the method used in this traffic impact assessment. The first principle approach will be based on the operational requirements of the site and the estimated number of staff on site at any one time. The applicant shall provide further parking/survey data of similar developments to justify the provision of 101 car parking

spaces is adequate to accommodate the expected highest future parking demands generated by the proposed Data Centre.

Swept path diagram:
The applicant has not provided swept path analysis to demonstrate how 19m articulated vehicles can satisfactorily turn into and out of the loading bay which are designed to accommodate these vehicles. The dimensions of the loading bays to cater for the 19m articulated vehicles shall comply with the requirements of AS 2890.2:2018.

Loading bay dimensions:
1. The applicant shall confirm the dimensions of the various loading bays to be proposed within the site to accommodate various commercial vehicles (8.8m medium rigid vehicles, 12.5m heavy rigid vehicles, 19m semi-trailers and 700T Mobile Crane). The dimensions of various proposed loading bays shall comply with the requirements of AS 2890.2:2018. Further information shall be provided regarding this matter.

2. The applicant's swept path diagrams (SALT-23034-SK-005, SALT-23034-SK-006 and SALT-23034-SK-008) have shown that 12.5m heavy rigid vehicles and 8.8m medium rigid vehicles can satisfactorily reverse into the loading bays. However, it is noted that two 8.8m trucks or two 12.5m trucks will be parked very close to each other at a loading bay in Data Centres 01 or 02. The applicant shall ensure the dimensions to cater for the trucks parking within the loading areas comply with the requirements of AS 2890.2:2018. Further information shall be provided regarding this matter.

3. The applicant has not provided sufficient information in the Civil Engineering Drawings to demonstrate that the proposed loading dock ramp grades and levels are acceptable in accordance with AS 2890.2:2018.

Speed humps:
Given there are potential conflicts between heavy vehicles and other users, the applicant should consider the option to install traffic calming devices e.g., speed humps within the site to help reduce travel speeds and improve safety particularly at/near the conflict zones (intersections and pedestrian crossing locations).

Traffic signs:
1. Based on a review of the site plan provided by the applicant, it appears that there are sections of the site which are not sufficient to cater for two-way traffic flows. Where one-way roadway is provided within the site, the direction of travel within the site shall be clarified through signs and/or line markings (one-way pavement arrows). The applicant shall clearly indicate one-way traffic movements on the site/architectural plans.

2. The intersection areas where conflicting movements occur (conflict zones), the applicant shall consider the option(s) to install give-way signs and/or line markings to minimise the potential conflicts. The site/architectural plans should be updated to reflect the give-way arrangement at intersection areas to helps ensure the safety of users within the site.

Construction traffic impact:
The applicant shall assess the construction traffic impacts that could potentially impact the surrounding road network during construction stages. Mitigation measures should be implemented to reduce the impact of construction traffic.

B. Asset Management

Footpath upgrade
Council officers recommend extending the existing footpath along the frontage of the property (from property number 2 up to bridge located near the property boundary) to provide continued pedestrian access.

Work in Council's Road Reserve:
Maintenance of the proposed boundary fences and retaining walls are to be the responsibility of the owner.

Damage to Council Assets:
1. Council recently resurfaced a section of Davis Road in front of the subject site. Council officers recommend conditioning the re-sheeting or resurfacing (with an asphalt overlay) the full width of the road in front of the site after completion of their building works in relation to mitigate the road damage due to movement of heavy construction vehicle.

2. Any damage to Council's assets must be restored to Council standards and specifications prior to the issue of a Road Reserve Clearance Certificate.

3. Applicant must notify to council if there any other Council assets that are proposed to be demolished or impacted by the proposed development.

Asset Hand Over:
List all new constructed assets as part of the new development that will be handed over as specified in Council's New Asset Handed Over Template. Ownership and maintenance responsibility should be defined and listed. Asset Management Division can be contacted for more information.

Dilapidation survey:
Following conditions should be included in relation to protect public infrastructure:

PROTECTION OF PUBLIC INFRASTRUCTURE
1. Before the commencement of construction, the Applicant must:
(a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection, and support of the affected infrastructure;
(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, kerb and gutters, footpaths, concrete open channel/culvert, and road bridge); and
(c) submit a copy of the dilapidation report to the Planning Secretary and Council.

2. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:
(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and
(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

C. Stormwater Management

The stormwater concept plan prepared by Van De Meer consulting is generally acceptable to Council. However, the following details shall be incorporated in the stormwater plan.

1. Provide a schematic cross-sectional detail of the existing outlets / boundary pits onto the stormwater Channel to enable Council engineers to determine if new works required at outlets.

2. The details of the proposed rainwater tanks shall be clearly shown on the stormwater plan. Provide volume calculation to demonstrate compliance with water conservation requirements as noted in Council's Stormwater Management Policy Sep 2017.

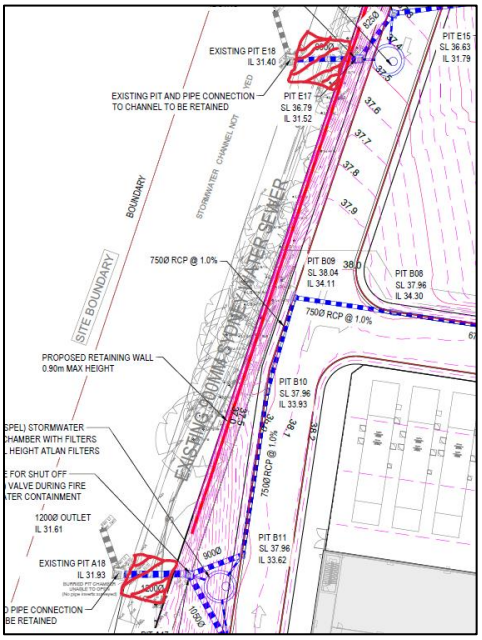
3. Include notation as to how the runoff from the roof drainage will be captured and conveyed to the proposed drainage system.

Stormwater drainage assets:
Council officers recommend the following:
1. Provide details of Council's burden and benefited easement and its maintenance responsibility (if any). If the stormwater culvert is inaccessible for machineries, provide a detailed maintenance plan on how the stormwater culvert can be maintained.

2. Ensure erosion and sediments are controlled during construction to not pollute the stormwater channel.

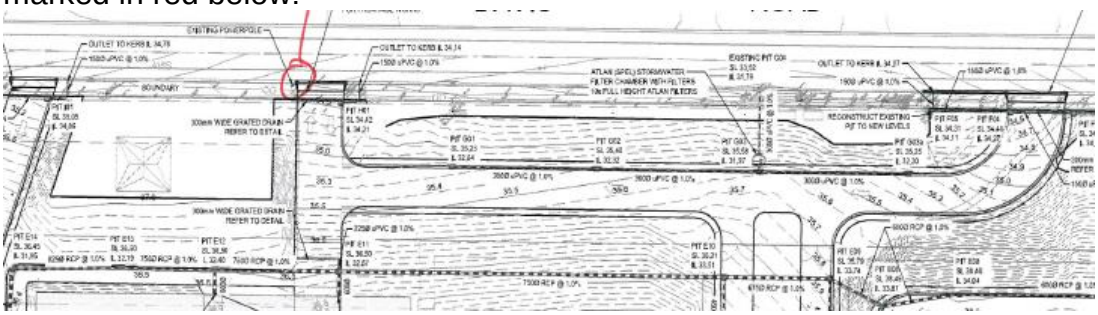
3. Ensure the Atlan (Spel) Stormwater Filter Chamber is maintained so no pollutants can enter the stormwater system. Stormwater pipes connecting into the culvert or stormwater pit is to be maintained by the owner.

4. Reconstruct the affected concrete lined open channel where it is shown on the map below with the red hatch.



5. Vibration monitoring is required due to vibration inducing activities (such as excavation, piling or drilling works) near the stormwater culvert. Pre-construction monitoring is required to establish baseline readings. Council must be notified of any displacement of the culvert.

6. Minimum 1 metre clearance will be required from the power pole to the driveway marked in red below:



7. Safe Works Method Statement (SWMS) and Contingency Plan must be submitted prior to works due to the safety of working in or near the stormwater culvert.

Stormwater Outlets
All stormwater outlet connection to the kerb shall be RHS galvanised steel channel section with a cross-section area equivalent or greater than the existing pipe diameter and to be of a depth that will allow a full paver to be laid in 15mm of wet concrete mortar above the channel section on newly reconstructed kerb and gutter.

D. Remedial Action Plan

In consideration of the information submitted, Council's Public Health & Environment Branch does not raise any objections to the proposal. However, council officers suggest that the following measures should be implemented to protect the residents of Fairfield LGA neighbouring the proposed development site to the fullest extent feasible:

1. Considering the site's size, the severity of contamination, the chosen remediation approach, and the incomplete information in the remediation action plan, the Public Health and Environment Section recommends engaging a NSW EPA-accredited Site Auditor for the entire duration of the project to ensure the proper management of the contamination remediation efforts.

2. In accordance with State Environmental Planning Policy (Resilience and Hazards) 2021 Chapter 4, the consent authority cannot consent to the development of the land unless it has considered whether the land is contaminated, and if the land is contaminated, it must be satisfied that the land is suitable in its contaminated state (or would be suitable after remediation) for the proposed development.

3. Site auditors can assist a planning authority by commenting on or verifying information provided by a proponent in relation to site assessment, remediation, or validation—such as whether they have adhered to relevant standards, procedures, and guidelines. Engaging a site auditor can also provide greater certainty about the information on which the planning authority is basing its decision, particularly where sensitive uses are proposed on land that may be contaminated and a statement about the suitability of the site is required.

E. Biodiversity values

1. The subject site contains mature native vegetation representative of Cumberland Shale Plains Woodland (PCT 3320), in addition to areas of planted native and exotic vegetation. The proposal will remove 322 trees, retain 74 trees and plant 322 new trees as detailed within the provided Landscape Design Report by Arcadia.

2. A Biodiversity Development Assessment Report (BDAR) has been prepared by Narla Environmental in accordance with the Biodiversity Conservation Act 2016. It is determined that a total of 1.17ha of the Cumberland Shale Plains Woodland will be directly impacted by the proposal therefore requires a total of 18 ecosystem credits are required to offset the biodiversity impacts of the development. The matter was referred to Council's Natural Resources Team and raised no issues subject to implementing the recommendations of the report.

F. Landscaping

A review of the landscape plan illustrates a few native weeds proposed that are likely to not grow within the site as they are not suitable within the Cumberland plain. The planting species where not appropriate shall be replaced with species listed within Appendix F of the Fairfield City Wide Development Control Plan 2013.

Based on the above comments raised by Council, additional information shall be provided for Council officers to further consider the proposal.

G. Waste Management

The Waste Management Plan is generally acceptable. The minimum areas identified for general waste and recycling appear suitable. Appropriate e-waste areas will should be incorporated into the waste areas.

H. Social and economic implications

1. Council officers support the notation that the new development will create local job opportunities. It is encouraged that any jobs offered by the developer and contractors are advertised heavily in Fairfield City Area with the hope they can be filled by local residents.

2. The number of ongoing operational jobs are relatively low when compared to many other industries and sites in Western Sydney. A relevant report of job density is the Greater Sydney Commission – Employment Lands Analysis provides an indication of 1 FTE job per 277 sqm. With two data centre buildings, each 3 storeys at 19,551sqm we would be expecting approximately 423 ongoing jobs as opposed to 72 operational jobs using the abovementioned metrics.

I. Section 7.12 Contributions

1. Fairfield Council's Local Infrastructure Contribution Plan 2023 applies to this site. Accordingly, the Section 7.12 Levy applies to this development. Section 7.12 levy is 1% of the total cost of development for works over $200,000.

2. The Section 7.12 levy must be paid to Council prior to the construction certificate being issued for the development. If the cost of works changes, a revised cost report by a qualified quantity surveyor must be provided to Council.

Please contact Mosheur Rahman on (02) 9725 0850 if you require any further clarification regarding the above.

Yours faithfully,

Chris Shinn
COORDINATOR STRATEGIC PLANNING