

23 May 2025

Your Ref: SSD-6963756
Our Ref: 2025/304481
File No: R/2024/2/A

Patrick Copas
Principal Planner
Department of Planning, Housing and Infrastructure

By Major Projects Planning Portal

Dear Patrick

**State Significant Development – SSD-6963756 – DigiCo SYD1 Data Centre
Expansion – Advice on EIS**

Thank you for your correspondence dated 30 April 2025 inviting the City of Sydney (the City) to comment on the above referenced State Significant Development application.

The State Significant Development application is for an expansion and intensification of an existing data centre located at 392-422 Harris Street, Ultimo.

The City has reviewed the documentation and provides the following comments for your consideration:

Amenity and Air Quality

The proposed additions would result in additional overshadowing to the neighbouring apartments located at 287 Pyrmont Street. The design report identifies overshadowing to certain apartments on levels 8 and 9 of Building B and levels 6 and 7 of Building C.

An assessment should be provided utilising the City's Draft Minimising overshadowing of neighbouring apartments guide to demonstrate that the proposed development is consistent with objective 3B-2 of the NSW Apartment Design Guide.

The overshadowing assessment does not provide a comprehensive assessment of the existing solar access compared to the future compliance as a result of the proposal and does not utilise the above interpretation of the objective. The assessment should also be provided at 15-minute increments not 30-minute.

It is recommended that the southern setback of the proposed additions is increased to prevent additional overshadowing to the apartments to the south.

It is also noted that the proposed development has the potential to overshadow the adjoining Ultimo Heritage Conservation Area (HCA) to the west, the proposed additions have been setback from the western edge of the building to ensure that there would be no additional overshadowing to the HCA. Submission of a digital model is required to ensure compliance with this requirement, refer below.

The community has expressed concerns over air quality and the locations of the air monitors. Consider the merits of the air monitoring being in residential areas where the most sensitive receivers are located.

Public Domain

The proposed public domain works including the construction of additional garden beds and pavement works are generally supported. Conditions are required to be imposed to ensure these works are undertaken in accordance with the City's specifications and requirements. The footpath in Quarry Street is in poor condition and should be required to be reconstructed.

The architectural plans use assumed RLs which do not match actual levels. The plans are to be amended based on the nearest survey benchmark levels.

It is recommended that the flood model (2016) be updated to reflect current conditions to demonstrate that proposed development does not increase flood risk or have offsite flood impacts, and updated flood levels be considered to determine the required flood planning levels.

A plan and table should be provided indicating the existing building floor levels at each entry point in Harris Street and Pyrmont Street with corresponding required Flood Planning Levels (FPLs) to demonstrate compliance with the City's Interim Floodplain Management Policy.

A Flood Emergency Response Plan should be prepared, notwithstanding the site having a H1 hazard level in a PMF event.

Landscaping and Tree Management

The proposed removal of T27 *Sapium sebiferum* (Chinese tallowwood) located within the footpath on Pyrmont Street is not supported and that part is objected to, whilst the tree is proposed to be replaced with three *Angophora costata* (Sydney red gum) within a 20m long continuous garden bed. The wind report states that the removal of the existing deciduous tree is proposed to allow the planting of additional evergreen species to assist in ameliorating wind impacts near the intersection of Quarry Street and Pyrmont Street. The City does not support this justification for the removal of a well-established and otherwise healthy mature tree and note that many street trees are deciduous.

The construction of two garden beds along the eastern side of the building would result in minor encroachments to the TPZ of the eight existing street trees located along Pyrmont Street. Whilst this encroachment may be supported, the works should be overseen by the project arborist.

Similarly, the construction of a garden bed within the public domain along Quarry Street would result in moderate to high impacts to the five existing street trees. The Tree Protection Plan misidentifies four Japanese Zelkova trees as *Celtis australis* (Hackberry) and should be corrected. As above, the detailed tree sensitive construction and protection methods in the submitted TPP are to be followed. There should be no change to soil levels within the SRZ or TPZ of these trees.

There are eleven existing street trees located along the Harris Street frontage, as above, the TPP misidentifies one Japanese Zelkova tree as *Celtis australis* (Hackberry) and should be corrected.

The proposed development results in a reduction to the existing greening of the site, contrary to the recommendations of the DRP. Some additional greening is proposed through the construction of additional garden beds within the public domain. Whilst commendable, additional greening should be accommodated within the site such as additional roof gardens to assist in meeting the *Greening Sydney Strategy* and *Urban Forest Strategy 2023*.

The new proposed green roof is located above the ground level loading dock entry. There is absent clarity regarding:

- engineering advice to confirm the structural capacity of the existing structures to support the weight of the green roof including wet soils.
- green roof planter details to confirm soil depth, including drainage and irrigation levels.
- the drainage design.
- whether the proposed grass and ground cover species are suited to the site's microclimate, being heavily shaded.
- safe access for ongoing maintenance post construction.

Heritage

The preparation of a heritage interpretation plan to appreciate the historical use of the site as Government Printing office is supported.

Sustainability

An Embodied Emission Report is required to be submitted.

Model

The City has received a physical model of the proposed development; however, a digital model has not been provided. The City's Modellers are to be contacted at model@cityofsydney.nsw.gov.au to confirm the requirements for the digital model.

Signage

The City recently approved a development application for additional signage for the building. The approved signage is well considered and does not include any advertising signage. On this basis, the proposed SSD should not include any further signage.

Consultation

The Department should seek feedback from local community groups to make sure all matters are taken into account. Should you wish to speak with a Council officer about the above, please contact Michael Stephens, Senior Planner, on 9265 9040 or at mjstephens@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Chief Planner / Executive Director
 City Planning | Development | Transport