



Your ref: SSD-73761707
File no: MC-25-00004

12 June 2025

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

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

Attention: Shaun Williams

Dear Sir/Madam

SSD-73761707 - Notification of exhibition of a State Significant Development Application for Glendenning Road Data Centre

Thank you for your correspondence dated 14 May 2025 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 identified 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 the response to our submission be 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

Judith Portelli
Manager Development Assessment

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

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Blacktown City Council's submissions to SSD-73761707

1. Planning issues

- a. The proposal represents a car parking non-compliance with the Blacktown Development Control Plan as identified in the Traffic comments below which is not supported. 823 car parking spaces are required and 165 are proposed. The building's use could change at any time in the future to a use that demands full compliance with the parking rates. If it is shown to be impossible to comply with the required parking rates, provide an adaptive reuse parking plan in the event that the building is ever changed to another use to show how full compliance with parking could be achieved on-site.
- b. Provide elevations with top and bottom heights for all the retaining walls proposed.
- c. The proposal has high visual impacts due to its bulk and scale in comparison to the surrounding built form. As shown in the Visual Impact Assessment, even at the full maturity of the proposed tree planting, the building will still be clearly visible above the tree canopy and surrounding roof lines. There are no other buildings of this height anywhere in the vicinity and the site is directly abuts the Nurragingy Reserve, so it is considered to be out of character and will not compliment its surroundings.
- d. Provide additional landscaping and tree planting in the front landscaped setback area adjacent Glendenning Road. Underground fuel tanks are also proposed in the landscape setback which compromises the opportunity for dense landscaping in the front setback. These tanks should be relocated accordingly.
- e. Additional dense landscaping is to be provided in front of any retaining walls that will be visible from Glendenning Road.
- f. Amend the landscape plans to provide 1 tree every 10m in the car park as required under the Blacktown Development Control Plan. Several landscaping strips in the car park do not include any tree planting.
- g. It appears that the existing maintenance track to Nurragingy Reserve will be impacted by the landscaping in the south eastern corner of the site. Please clarify the plans in this regard.

2. City Architect

- a. There is no significant amendment to the Landscape/site plan that addresses comments made previously where it was requested to achieve a 20m landscaped buffer to the eastern boundary, free of parking areas, driveways, plant, equipment, and tanks in this zone.
- b. Building heights have not been reduced. We would like to see some judicious use of colour in the facades, for example the flues, louvres or dri-design panels. As currently presented, the proposal is monotone. Precedent examples in the design report (section 05 page 25) of bronze or green hues are promising. It is noted that

any architectural treatments to facades will not alleviate the visual impact of the development.

3. Traffic issues

- c. No swept path analyses are provided with the Traffic Impact Assessment. The swept path for the largest delivery vehicle expected to service this development must be submitted to Council for consideration.
- d. The traffic report did not indicate where garbage will be collected.
- e. Investigate sight lines at the proposed vehicular access and propose no stopping restrictions based on the sight distance requirements within the relevant Australian Standards.
- f. 165 car parking spaces are proposed. This parking provision does not comply with the Blacktown DCP requirements. Application of the parking requirement in the Transport for NSW Guide to Transport Impact Assessment (2024) yield 179 spaces for such a use which is also 14 spaces more than the proposed parking provision.
- g. The proposed development is expected to increase on-road parking demand as some staff and visitors will have no choice but to park on the public road instead of designated parking within the site.

4. Social Planning

a. Microclimate and urban heat:

The proposed Data Centres (DC) are intensive uses due to the necessary water and energy requirements to cool the servers to ensure ambient temperature does not exceed 33.3 degrees. The proposed location of the DC will be in one of the hottest parts of Western Sydney that is already vulnerable to urban heat. Whilst the site is benefitted by its proximity to Nurranginy Reserve and its extensive tree canopy assisting in urban cooling, the future centres will increase the temperature of the microclimate. By heating the nearby area, the number of hot days and heatwaves impacting an already vulnerable community will rise (As pictured below).

As climate change continues to increase the temperature, regularity of heatwaves and overall extend and exacerbate Western Sydney summers, the facility is likely to increase the predicted number of days that manufactured cooling is required. The accompanying Social and Economic Impact Assessment briefly notes the 'potential' impacts of urban heat from increased industrial uses. However, the supporting ESD report fails to appropriately articulate the temperature increase to the microclimate generated from the 3 centres compared to a conventional industrial development.

Urban heat effects as pictured below, will be exacerbated by the operations of the new DC and must be better addressed in the proposal. Improved design, technology and engineered solutions or overall consideration of the appropriateness of the site for the intended use should be undertaken. The financial gains of the owner should

be balanced with improved investment back into the site and surrounding community.

Image 1

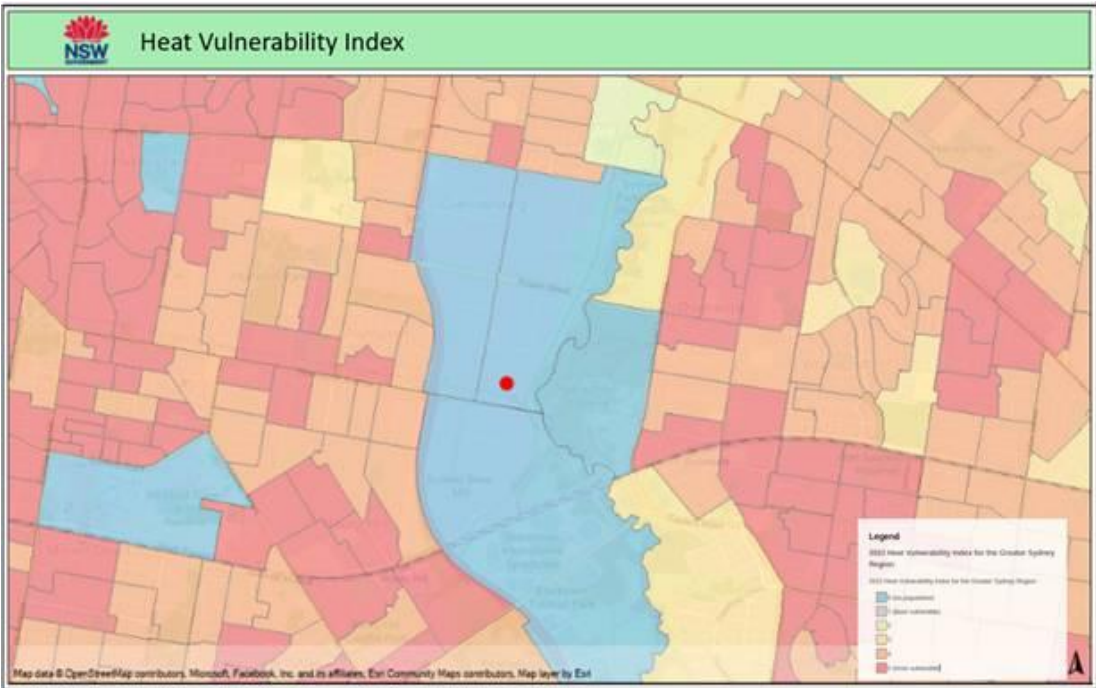
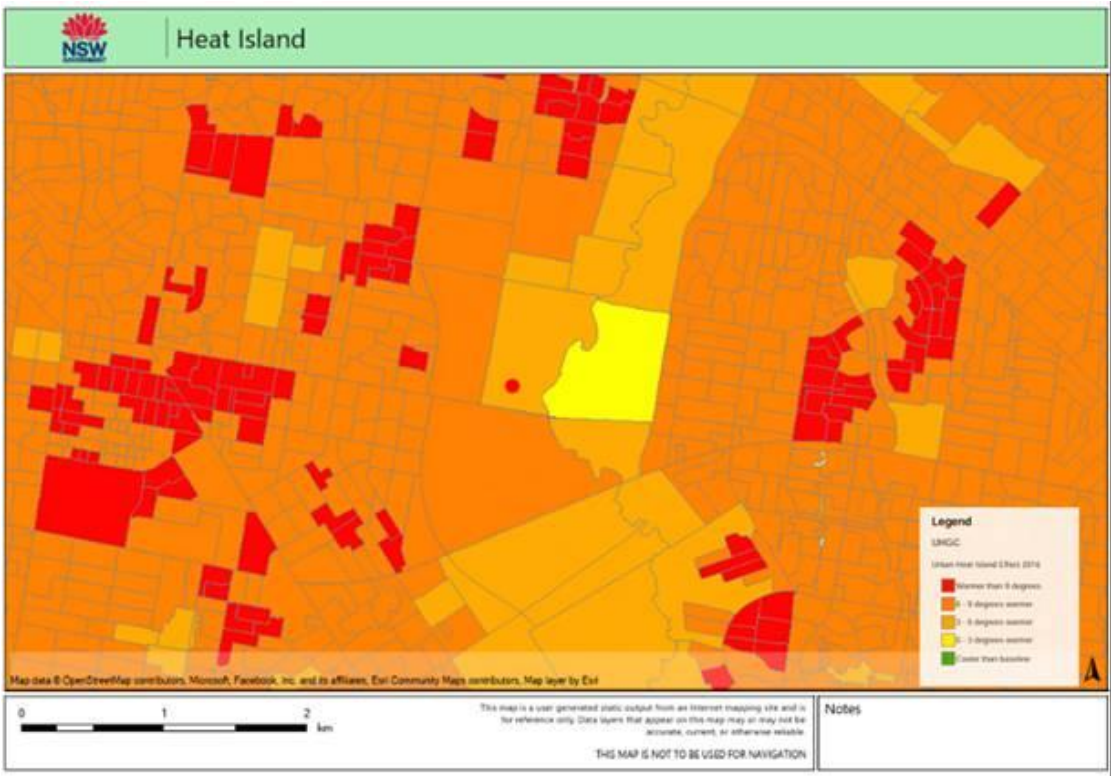


Image 2: site and surrounding community



As BCC is an active contributor in the Greater Sydney Heat Task Force and the development should be designed and operated in line with the recommendations of the Greater Sydney Heat Smart City Plan 2025-2030. With Blacktown becoming a

preferred location for new data centres this impact is going to be intensified as colocation with other DC occurs. Impacts of not only this site, but all existing and proposed DC should be better assessed and addressed. As per the Smart City Plan, new development should work to reduce any negative impacts to the environment and community. Applying improved and innovative mitigation measures, whilst acknowledging the impacts of this development type, will achieve an improved outcome for the site.

b. Impact on public domain:

The proposed built form will result in a dominant structure visible from a slew of areas, many of which are not within a similar character or context. Acknowledging the architectural requirements for the development, such as, increased floor to ceiling heights and need for security clearance setback, the façade treatment should be improved as the current design appears monolithic within its context and does not achieve a good outcome for the site. This will impact the outlook of nearby communities and visitors.

c. Operational employment figures:

The proposed operational employment figure increases identified in the S&EIA do not factor in the existing employment numbers across the 3 existing warehouses on the site. A revised analysis taking into consideration of the existing context of FTE jobs and the diversity of job skill sets in operation is to be demonstrated. The amendments should further evidence the positive contribution of the development.

Note: if these businesses have ceased operation due to the development, the calculations should be taken from business as usual figures.

5. Engineering

- a. The applicant has failed to demonstrate that the proposal will be able to comply with Council's Engineering requirements outlined in council's Engineering Guide for Development – 2005

6. Drainage

- a. Supporting documents must be provided in electric copy for assessment:
- DRAINS model to confirm the internal design of the site.
 - MUSIC model shall be provided to confirm the Stream Erosion Index (SEI), reduction target and the non-potable reuse target are achieved.
- b. The applicant is required to provide a water quality treatment system to treat the whole site. However, the southern side of the site, which is about 18,000 square metre, is not included in the water quality treatment system. And it is similar to the northern side of the site nears to the drainage channel. If the applicant decided to bypass the area to the system, the areas must be included in the MUSIC model as the bypass areas. And the pollutant reduction target must also be achieved.
- c. The minimum gradient of any pipe shall exceed 0.5%. Please amended the design.

- d. It is unclear how a 11,000 square metre to connect into a 100KL when there is no down pipe is shown in the submitted plan.
- e. 75 Ocean guard are shown in the print screen of MUSIC model in the Civil Engineering report. However, it is unclear where are they in the submitted plan.
- f. The filter chamber is inconsistent between the report and the submitted plan.
- g. Please provide calculation to support the weir level of the splitter pit A3.
- h. Please provide the details of proposed headwalls with scour protection in accordance with Council standard drawing
- i. Please provide the SEI calculation when no OSD is required in the lot.
- j. A water quality catchment plan must be provided.
- k. With regards to flooding, the site is affected by an overland flow in both low and medium risk. The development proposed significant cut and fill within the site. The existing overland flow path will be disturbed and it may lead to negative flood impacts to the roadway and surrounding properties. The amended flood risk report must verify the changes. Alternatively, a flood modelling may be required to determine the impact of the development.