

By email
27 February 2024

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Dear Shaun,

43-61 Turner Road Data Storage Centre

Request for Industry Specific SEARs

This letter has been prepared to support the request for Industry Specific Secretary's Environmental Assessment Requirements (SEARs) for a proposed Data Storage Centre at 43-61 Turner Road, Gregory Hills.

The proposed data centre will have a capacity of over 15MW, which triggers its classification as State Significant Development (SSD) under Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021.

1. Applicant Details

The applicant details for the proposed development are listed in the following table.

Table 1: Applicant Details

Descriptor	Applicant Details
Full Name(s)	Arup Pty Ltd
Postal Address	Level 5, 151 Clarence Street, Sydney, NSW 2000
ABN	18 000 966 165
Nominated Contact	Christopher Serrano
Contact Details	christopher.serrano@arup.com

2. The Site

2.1 Location

The Proposal would be located at 43-61 Turner Road in the suburb of Gregory Hills, NSW 2557 (the Site). The Site comprises of four lots of lands (Lot 14, 15, 16, and 17, DP 28024) is approximately 9.74 hectares (ha). It is located within the Camden Council Local Government Area (LGA). The Site is located approximately 45 kilometres southwest of the Sydney CBD, and six kilometres from Campbelltown.

Appendix A provides an overview of the Proposal location.

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2.2 Zoning and surrounding land use

The Site is zoned IN1 General Industrial under *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (SEPP WPC). It also falls under the Turner Road Precinct Development Control Plan (2018) where it is zoned as Industrial. The objectives of the IN1 General Industrial Zone as noted under the SEPP (Precincts – Western Parkland City) 2021 include the following:

- “To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities and to support the viability of centres.
- To minimise any adverse effect of industry on other land uses.
- To enable development for the purpose of commercial offices only where it is associated with, and ancillary to, another permissible use on the same land.
- To enable development for the purpose of retail premises only where it serves convenience needs, or where the goods or materials sold are of a type and nature consistent with construction and maintenance of buildings.”

Under the Turner Road Precinct Development Control Plan (2018), the Turner Road Industrial Area is noted as an area to provide for a range of industrial, light industrial, warehouse and distribution uses.

The surrounding land use is commercial/industrial, with the exception of the immediately to the east, where it comprises a riparian corridor, and beyond this are residential properties.

Appendix A, Figure 1 provides an overview of the land use zoning. Table 2 below summarises the adjacent properties and land uses.

Table 2: Adjacent properties and land use

Location	Land use zoning	Current and planned future use
Site	IN1: General Industrial	<p>The condition of the land quality across the site is currently unknown but may be subject to contamination due to surrounding industrial land uses and elevated concentrations of groundwater pollutants and other matters identified on Site. The Site also contains vegetation and an existing garage and chicken coop on site.</p> <p>Development consent has also been granted on the site by the Sydney Western City Planning Panel on 11 May 2023 for the demolition of existing structures, tree removal, remediation of contaminated land, subdivision to create 23 industrial lots and one residue lot, construction of a public road, and associated site works as part of a previous Development Application (DA) (DA No. 2022/492/1).</p> <p>An application for an Aboriginal Heritage Impact Permit (AHIP) was lodged on 2 May 2023 to destroy two Aboriginal sites</p>

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Location	Land use zoning	Current and planned future use
		identified on the site (Aboriginal Heritage Information Management System [AHIMS] ID #52-2-3557 and #52-2-3873). This application is still outstanding.
West	IN1: General Industrial	To the immediate west of the Site the land has been subdivided by Stockland Group for future industrial development. The subdivision extends to Camden Valley Way farther to the west.
North	B5: Business development and IN1: General Industrial	<p>There is an industrial precinct to the north, which is currently under construction. It includes a series of landowners:</p> <ul style="list-style-type: none"> • Equity Trustees Limited (2 Steer Road Gregory Hills NSW 2557) – Shopping centre • In-Style Holdings Pty Ltd - AUSREO - Gregory Hills (17 Rodeo Road) • Carey Family Investments Pty Ltd - Gregorys Steel Supply/ O'Brien (19 Rodeo Road) • Amk Group (NSW) Pty Ltd - Dance School (Team Dance)/ Trotec Laser Australia (23 Rodeo Road) • 25 Rodeo Road – has separate private owners for units 1-3 • Bartolo Family Pty Ltd (27-29 Rodeo Road) • Reece Civil (44-48 Rodeo Road Cnr Central Hills Drive).
East	RE1: Public Recreation	<p>To the immediate east is a riparian corridor and open space. Further to the east, across Pioneer Street, is a residential neighbourhood of Gregory Hills.</p> <p>Most of the site was biodiversity certified under the repealed Sydney Region Growth Centres SEPP (now forms part of the Western Parkland City SEPP). As part of the biodiversity certification process, the impacts of vegetation removal and associated offsets have already been considered and do not require further assessment of impacts on threatened species, populations and ecological communities or their habitats that would not normally be required by the <i>Environment Planning and Assessment Act 1979</i> (EP&A Act) or <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). However, key environments and habitats such as areas of the adjacent riparian corridor are removed from the certification process as they were unique, rare, or offered wider ecological value.</p>
South	Zone E3: Productivity Support	To the immediate south of the Site, there is an area that contains additional industrial land. This includes warehouse type facilities, mechanical and repair type businesses, and a number of fitness and sporting type businesses. Areas of existing vegetation

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Location	Land use zoning	Current and planned future use
		connected with those adjacent to the Site area also located to the south within this zone.

2.3 Site features and known issues.

The Site is currently characterised as rural residential, with each lot comprising of single detached dwellings, sheds, interspersed vegetation, grassed fields and farm dams. To date, works that have been completed on the Site are limited to the demolition of existing structures.

There are the following environmental features on and proximal to the Site:

- Interspersed vegetation and grassed fields
- Riparian corridor directly to the east.
- Five farm dams collecting overland stormwater flows.
- Single story residential buildings, outbuildings, sheds, and septic tanks.
- Unknown land quality conditions given nearby potentially contaminating activities and elevated concentrations of groundwater pollutants and other matters found on Site. Asbestos has also previously been identified on Site.
- Central Hill Drive runs through the Site and White Cliffs Avenue will also need to either terminate on the Site or need to connect to Turner Road.
- A 12m level change occurs across the Site.
- Two identified Aboriginal heritage sites as discussed in Table 2.
- Existing recycled water network to the north of the Site.
- Wastewater mains located close to the Site.

The Site is located within the Narellan Creek catchment, a tributary of the Nepean River. The closest waterway is Kenny Creek, approximately 55 metres to the east, which is associated with the riparian corridor immediately east of the Site. The Site generally slopes downward from the northwest corner to the southeast corner. Ground elevations vary from around 91 to 104 metres Australian Height Datum (AHD) in line with the general northwest to southeast topography.

2.4 Historic land use and approvals

The Site has only been used for rural residential development. It appears to have been first put to this use in the 1940s based on historic mapping. However, the Site is currently unoccupied following its acquisition by the applicant in 2023. The site shows to have been progressively developed since the 1940s. Table 3 below summarises the extant development applications applicable to the Site.

Table 3: Extant Development Applications

Previous Development Applications	Description
DA-2022 49 21 Demolition of existing structures, tree removal, remediation of contaminated land, subdivision to create 23 industrial lots and one residue lot,	The application applied to 43, 49, 55, 61 and 67 Turner Road and 37B and 48 Central Hills Drive, Gregory Hills, and

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Previous Development Applications	Description
public road construction and associated Site works.	proposed the subdivision of the Site. Several documents and environmental studies were prepared for this application.

3. Planning context

Data storage facilities are a form of development permitted with consent in IN1: General Industrial as provisioned under Division 3, Clause 2.31 of State Environmental Planning Policy (Transport and Infrastructure) 2021. As noted above, the power usage onsite is sufficient for the Proposal to classify as State significant development (SSD) as per Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021.

4. Proposal Description

Table 4 below lists the Proposal's key components. A copy of the preliminary design drawings is submitted with this request for SEARs in Appendix B.

Table 4: Proposal key features

Descriptor	Proposal Details
Proposal	The construction of a data storage centre at 43-61 Turner Road, Gregory Hills (the Site). The Proposal will comprise data halls, mechanical and electrical equipment rooms, offices, substation, security gatehouse, other ancillary support spaces, and external/rooftop mechanical and electrical equipment.
SSD Trigger	The data centre building will have a capacity of over 15MW, which triggers the Proposal as a State Significant Development under the Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021.
Expected Capital Investment Value (CIV)	The expected CIV is approximately \$450M
Data Centre	<i>Building height</i> about 25 metres including stair and lift overrun <i>IT MW capacity</i> approximately 53MW <i>Number of data halls</i> 12
Back-up diesel generators and batteries	The data centre would require approximately 20 back-up diesel generators holding approximately 400 kilolitres of diesel fuel. Lithium-ion batteries would be installed to provide bridging power in the event of a power outage to keep security systems, computers, and other electronic equipment running as the back-up generators come online.
Hours of operation	24 hours a day, 7 days a week.

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Descriptor	Proposal Details
Access	Access to the data centre would be via the proposed driveways from Turner Road and White Cliffs Avenue.
Stormwater	Proposed directing stormwater discharge through adjacent Council land to the east, maintaining the current outlet to Narellan Creek. Provision for a stormwater easement across the site to facilitate the conveyance of upstream catchment water.
Electricity	Construction of a new substation to service the facility. Offsite works to connect the substation to Endeavour Energy's network would be undertaken under a separate approval.
Potable water, sewer, and telecommunications	Connection to existing mains along Turner Road/White Cliffs Drive.

5. Engagement

To date the applicant has engaged with Camden Council (21 December 2023) to introduce the Proposal and seek preliminary feedback. The applicant received a letter on 29 January 2024, setting out Council's expectations in terms of any development application in its LGA, as partly tailored to the specifics of the Proposal. The applicant is currently reviewing the letter and its content to progress the design to consistent with the relevant provisions as they relate to the planning controls and the Proposal's classification as SSD rather than standard form of development that requires consent from Council under Part 4 of the NSW *EP&A Act*.

A Scoping Meeting was held with the Department of Planning, Housing and Infrastructure (DPHI) on 1 February 2024 to discuss the key issues to be further assessed in the Environmental Impact Statement (EIS) ahead of making this request to make use of the Industry Specific SEARs under the Rapid Assessment Framework.

There has also been consultation with the key service providers as part of the initial site identification process all of whom have confirmed there to be sufficient utility capacity to support the Proposal.

An Engagement Report will be prepared as part of the EIS for the Proposal, including consultation with applicable State government authorities, Council, the Local Aboriginal Land Council, and surrounding landowners. The outcomes will be outlined in the EIS.

6. Environmental considerations

A high-level analysis of the environmental considerations is summarised below. This has been prepared to identify the key environmental issues that would require consideration in the EIS against the industry-specific SEARs.

6.1 Visual impact

The areas surrounding the Site are predominantly commercial/industrial warehouses with the nearest residential sensitive receivers located 300 metres north-west (Grazier Avenue) and 150 metres east (Pioneer Street). Properties to the immediate west of the Site are zoned 'IN1 General Industrial' and include several commercial and/or industrial businesses. These properties form part of the delivery of Gregory Hills industrial precinct.

A Visual Analysis and Visual Impact Assessment will be prepared for the Proposal and will focus on appraising the Proposal's impact on the surrounding residential and current/future industrial users accounting for the planned urban design treatments, external lighting, and landscape planting.

6.2 Traffic, transport, and accessibility.

The Proposal would not generate significant amounts of traffic volumes during operation given its function as a Data Centre. During construction there would be a temporary generation of site-based traffic that would affect the surrounding roads. This would be associated with the delivery of construction materials and workforce traffic. This is something that would be managed through the Construction Traffic Management Plan (CTMP).

A Traffic and Transport Impact Assessment (TTIA) will be prepared for the Proposal. A preliminary CTMP will be prepared for the Proposal and included in the TTIA.

6.3 Trees and landscaping

There is existing vegetation on the Site which will likely need to be cleared for the Proposal. The surrounding sensitive receivers (i.e. residents) may also be sensitive to visual amenity impacts

A Landscape Plan will be prepared for the Proposal.

6.4 Ecologically sustainable development

Long-term sustainability of the Proposal will be a factor in the design process, particularly in regard to the sustainable use of water.

An Ecologically Sustainable Development Report will be prepared for the Proposal. This will include a NABERS Embodied Emissions Material Form to disclose the amount of embodied emissions attributable to the Proposal.

6.5 Biodiversity

The Site is biodiversity certified under the SEPP WPC. As part of the biodiversity certification process, the impacts of vegetation removal and associated offsets have been considered and do not require further assessment of impacts on threatened species, populations, and ecological communities, or their habitats, that would normally be required by the NSW *Biodiversity Conservation Act 2016* and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. The biodiversity assessment undertaken for the existing approved DA identified the adjacent riparian corridor with native vegetation comprising Plant Community Type (PCT) 849. However, only a small portion of the riparian corridor has been assessed.

Although vegetation removal has been considered under the Biodiversity Certification Order, a review of potential indirect impacts to biodiversity would need to be included as part of the EIS for the adjacent riparian corridor.

A Biodiversity Development Assessment Report waiver will be prepared for the Proposal.

6.6 Back-up power system

Given the nature of the proposed use, it is important that the reliability of the facility is maintained in the event of a power outage. As such, back-up generators would be in place.

The potential impact of these back-up generators will be included within the EIS.

6.7 Air quality

The Site is located in an industrial area with the closest residential sensitive receivers located 150m from the Site. Local air quality may be impacted with the use of diesel back-up generators during power outages.

An Air Quality Impact Assessment will be prepared for the Proposal.

6.8 Noise and vibration

The Proposal would operate up to 24-hours a day, seven days a week, including periodical testing of back-up generators and other ancillary noise-generating activities. The proximity of noise sensitive receivers to the north-west and south-east means they could be impacted by the Proposal. There will also be noise-generating activities taking place onsite during construction that could also potentially affect these receivers.

A Noise and Vibration Impact Assessment will be prepared for the Proposal.

6.9 Ground and water conditions

There are currently five farm dams crossing the northern half of the Site. The closest waterway is Kenny Creek, located approximately 55 metres east of the Site within the riparian corridor.

The Flood Risk Desktop review identified that flooding within the Site appears to be localised to the existing farm dams crossing the northern half of the Site. Ponding at these farm dam locations is expected during any rainfall event producing stormwater runoff. The Narellan Creek Flood Study (NSW Public Works Advisory, 2017) shows the Site would not be impacted by flooding up to and including a Probable Maximum Flood (PMF) event.

Baseline groundwater conditions have not been established for the Site. Noting the proximity to potentially contaminating activities (e.g., wastewater treatment plants and fuel dispensing facilities such as petrol stations), there is a potential for groundwater contamination to be present at the Site (see section 6.13 for more detail). However, groundwater was not encountered during drilling works conducted by Geotechnique in 2023.

A Hydrology, Surface Water and Groundwater Assessment will be prepared for the Proposal.

6.10 Water management

There are five existing farm dams and mapped hydrolines within the Site and a riparian corridor adjacent to the site. The Proposal could therefore potentially impact the water quality and drainage

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functions of these elements. Onsite rainwater capture may also be included as part of the Proposal to offset some of the water demand requirements.

A Hydrology, Surface Water and Groundwater Assessment will be prepared for the Proposal.

6.11 Flooding risk

There are five farm dams located across the Site which present a potential localised flooding risk. Ponding at these locations is expected during rainfall events. A Flood Impact Assessment prepared by Cardno in 2022 indicates that the greatest flood depth for a 1% Annual Exceedance Probability (AEP) event is between 1 and 1.5m.

Flooding will be addressed as part of the Hydrology, Surface Water and Groundwater Assessment.

6.12 Hazard and risk

The Proposal would require the use and storage of diesel fuel, lithium-ion batteries, and back-up generators on Site which may present a potential hazardous risk once operational.

A Hazardous Building Materials Survey was also conducted by JBS&G (2022) on the structures currently located on the Site and identified the following:

- Friable asbestos in the garage and chicken coop structures located on Lot 14.
- Non-friable asbestos in various forms in most of the buildings and associated sheds across the Site
- Lead based paints within residential buildings onsite.
- Synthetic mineral fibres were identified in various forms on Site, particularly around internal insulation cores to hot water systems and insulation batts within roof voids. However, these were considered to be of low risk
- The likely presence of polychlorinated biphenyls (PCB) capacitors in the fluorescent lighting installed in the properties onsite. The presence of PCB was not able to be confirmed during as part of the previous Hazardous Building Materials Survey so is therefore assumed to be present as a precautionary measure.

The above elements could pose a potential contamination risk for the site which is discussed in section 6.13.

A Preliminary Hazard Analysis will be prepared for the Proposal.

6.13 Contamination and remediation

The Site's topsoil consists of silting clay with the topography varying approximately between 91 AHD to 104 AHD. There are five cascading farm dams that connect to a naturally formed channel running northeast to southeast. Previous Site contamination assessments on the Site were prepared for DA-2022 49 21, which identified the following:

- Materials containing asbestos were identified in various degrees across the Site, this includes the existing buildings where were found to be asbestos clad. Bonded asbestos was also found to be present in the soils around the chicken coop and garage.
- Soil containing fragments asbestos fragments was identified across the Site.
- Nitrogen, zinc, and copper were detected in the farm dam at concentrations above freshwater ecosystem criteria. Faecal coliforms were also detected at low concentrations.

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- Three of the dams have very high suspended sediment loads due to upstream developments.

Elevated concentrations of pollutants and other matters have also been identified in groundwater on Site.

A Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI) were carried out to support the extant DA, with additional analysis prepared during the site investigation work. This identified that a Remediation Action Plan (RAP) is required for the site given the presence of asbestos in the soil.

A DSI and RAP will be prepared for the Proposal.

6.14 Waste management

Sydney Water considers the discharge from cooling towers as Commercial Trade Waste which would require approval from Sydney Water in the form of a Trade Waste Agreement to discharge into the sewer system. The Proposal would also generate additional waste during construction and operation which would be assessed as part of the environmental impact assessment.

A Waste Management Plan and Hazardous Material Survey will be prepared for the Proposal.

6.15 Aboriginal and environmental cultural heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the existing approved DA (Austral Archaeology, 2022). Two Aboriginal Sites – both artefact scatters – were identified on the Site during archaeological test excavations, both of which were determined to not have research potential or possess any historic, aesthetic, social or spiritual significance.

The ACHAR identified Aboriginal Sites to be of low significance, and an Aboriginal Heritage Impact Permit (AHIP) application was been lodged on 2 May 2023 to remove the Site, as would be required to execute under the extant DA.

A detailed Aboriginal Cultural Heritage Assessment Report (ACHAR) and Archaeological Assessment will be prepared for the Proposal in accordance with Heritage NSW guidelines. The ACHAR prepared as part of the previous DA for the Site will be used as a guide to this assessment and help inform further consultation with the Registered Aboriginal Parties. An Aboriginal Heritage Impact Permit (AHIP) will not be progressed in accordance with section 4.41 of the EP&A Act as it is not required for State significant development.

6.16 Social impact

While the Site is predominantly surrounded by industrial type land uses, there are nearby sensitive receivers to the Proposal such as nearby residents and commercial businesses which could potentially be impacted socio-economically. This includes both positive and negative potential social impacts.

A Social Impact Assessment will be prepared for the Proposal.

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6.17 Infrastructure requirements and utilities

There are existing serviceable potable water, gas, sewer, electricity and telecommunications utility services for the Site, subject to extensions/augmentation of surrounding utilities infrastructure. The capacity of these utilities services to support the Proposal will however, need to be investigated.

An Infrastructure Delivery, Management and Staging Plan will be prepared for the Proposal.

6.18 Bushfire risk

The eastern portion of the Site and the adjacent riparian corridor are classified as Vegetation Category 3 and Vegetation Buffer on the Camden Council Bushfire Prone Land Map 2021. Vegetation Category 3 is medium bushfire risk vegetation.

A Bushfire Risk Assessment Report will be prepared to inform the EIS of the potential impact of the Proposal to public safety, property, and the environment. Potential impacts to native vegetation across the Site would be appropriately assessed within the Bushfire Risk Assessment.

7. Matters requiring no further assessment in the EIS

The following matters detailed in Table 6 below do not require further assessment, thus these matters will not be further assessed in the EIS.

Table 5: Matters requiring no further assessment in the EIS

Standard SEARs matters requiring no further assessment	Justification
20. Environmental Heritage “Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.”	<p>As per the Statement of Environmental Effects prepared by Think Planners (2021) as part of DA 2022 49 21, no non-Aboriginal heritage items are listed on or near the Site with the closest item one kilometre away.</p> <p>As no heritage items are listed for the Site and the Site has been previously developed, this removes any potential to directly or indirectly impact on the significance of environmental heritage. This means a Statement of Heritage Impact or Archaeological Assessment is not warranted. However, the EIS will validate the negligible risk and impact, with reference to the above report, while provisions for an unexpected finds protocol.</p>

8. Conclusion

We trust the information provided with this letter provides sufficient details to provide the Department with a comprehensive understanding of the proposed development to facilitate the issue of industry specific SEARs. If you require any further information, please do not hesitate to contact the undersigned to discuss.

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Appendix A – Proposal location



 Site Boundary



Metres

0 100 200 400

Esri Community Maps Contributors, Esri, TomTom, Garmin, Foursquare, METI/NASA, USGS, Maxar