

15 May 2024

Joanna Bakopanos  
Team Leader – Industry Assessments  
Department of Planning and Environment  
12 Darcy Street  
Parramatta NSW 2150

Dear Joanna,

**Request for Project Specific SEARs for a proposed Data Centre Facility at 105 & 113 Hollinsworth Road, Marsden Park**

**1. INTRODUCTION**

This letter has been prepared by Mecone Group Pty Limited on behalf of Canberra Data Centres Pty Ltd (CDC) in relation to a request for project specific SEARs for a proposed 504MW data centre facility (the proposal) at 105 & 113 Hollinsworth Road, Marsden Park (the site).

This follows the previous submission of a request for Industry Specific SEARs dated 24 April 2024. On 9 May 2024, Shaun Williams from Department of Planning Housing and Industry (DPHI) advised that, due to the scale of the project, a project specific SEARs would be required.

This letter provides a description of the site, overview of the proposed development and discussion of key planning issues to assist the DPHI with preparation of the Project Specific SEARs.

**2. THE SITE**

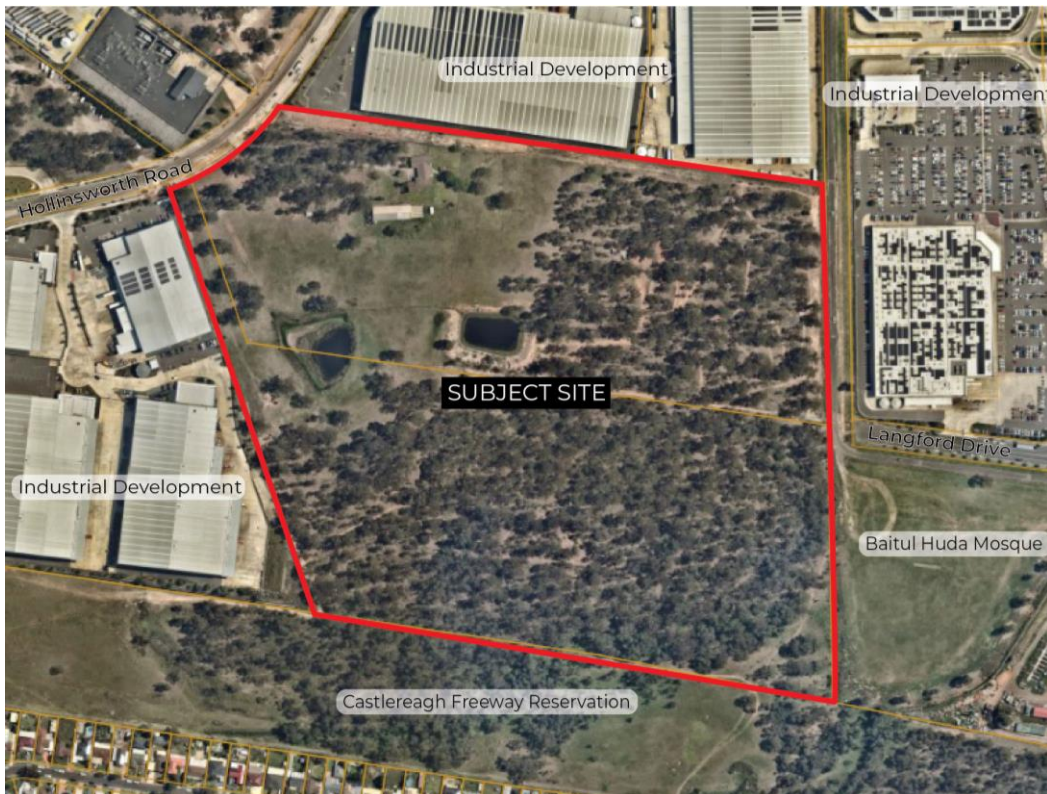
Site Description

The site comprises two lots known as 105 Hollinsworth Road (Lot 10 DP 1262052) and 113 Hollinsworth Road (Lot 11 DP 1262052), Marsden Park.

The site provides a total area of approx. 20.91 hectares and is bounded by industrial development to the north and west, the Baitul Huda Mosque and industrial development to the east, and the Castlereagh freeway reservation to the south. The site has a primary frontage of 120m to Hollinsworth Road. The site is zoned as IN2 Light Industrial.

In its existing state, the site is largely undeveloped, consisting of trees interspersed with areas of cleared grassland formerly used for rural-residential purposes. The site also contains two dams and connecting drainage lines.

Refer to Figure 1 and Figure 2 for the site and surrounding context.



**FIGURE 1 – Site Aerial**

Source: Nearmap, modified by Mecone



**FIGURE 2 – Cadastral Map**

Source: Mecone Mosaic

The site forms part of the Marsden Park Industrial Precinct. The intent of the precinct is to create an attractive employment precinct that provides for a diverse range of job opportunities to support the growing residential areas in Sydney's North West.

The precinct was rezoned on 19 November 2010 and has since rapidly developed as an industrial and



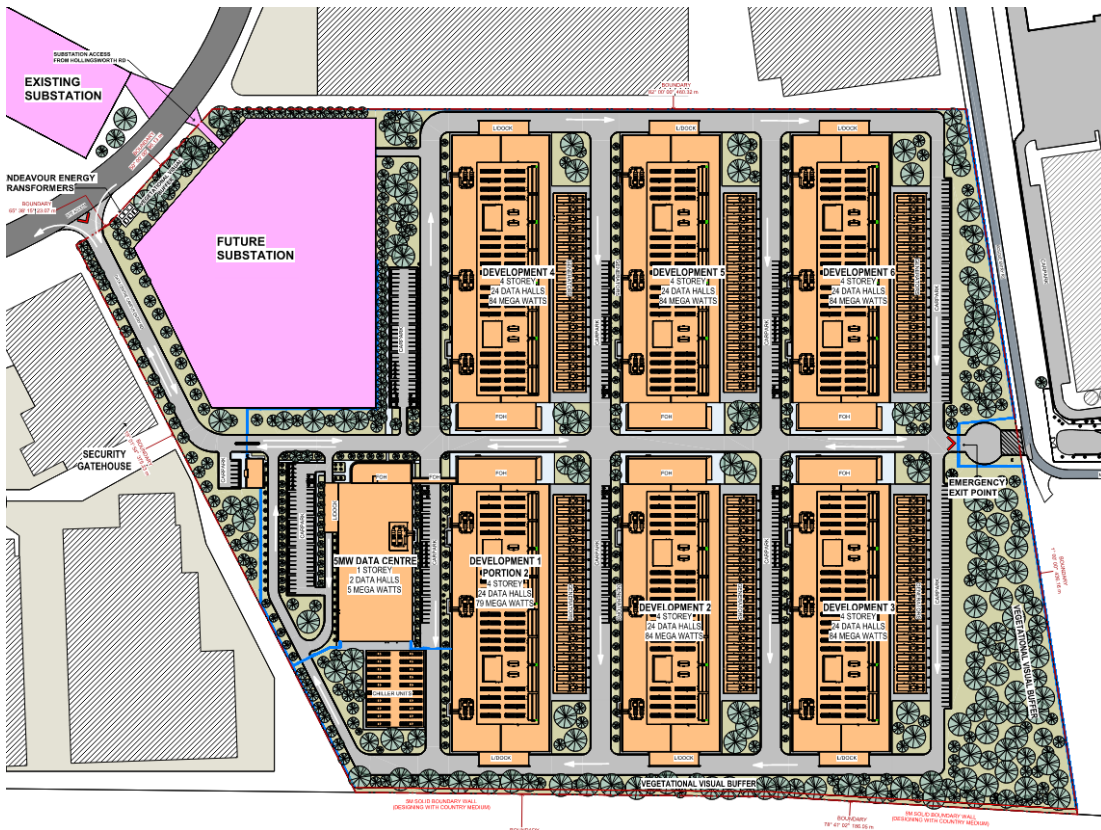
retail hub serving the new residential estates surrounding the precinct.

### 3. PROPOSED DEVELOPMENT

A summary of the key project components is provided in the table below. A copy of the concept architectural drawings are provided in Appendix 1, with extracts provided in the figures below.

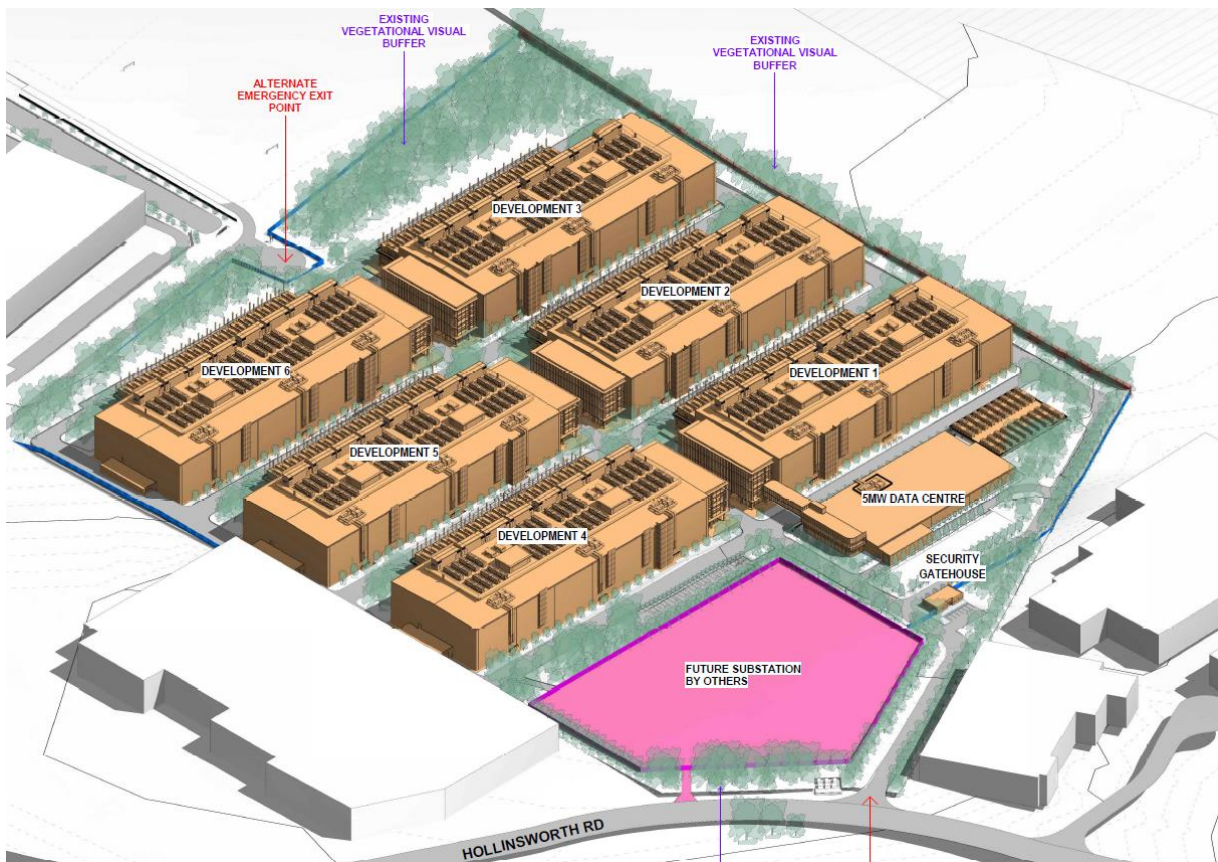
Component	Details
Applicant Details	<p>Name: Canberra Data Centres Pty Ltd (CDC) C/- Mecone Group Pty Limited (Mecone)</p> <p>Address: Level 15, 6 Hassall Street, Parramatta, NSW 2150</p> <p>ABN: 83 620 275 069</p> <p>Contact: Georgia Sedgmen, Western Sydney Team Director</p> <p>Contact Details: <a href="mailto:gsedgmen@mecone.com.au">gsedgmen@mecone.com.au</a> – 0405 505 228</p>
Planning Pathway	<p>Due to project requirements, planning approval for the project has been split into three phases:</p> <ul style="list-style-type: none"> <li>Phase 1 - Complying Development Certificate: Demolition of existing structures on site. CDC #8591 was approved 24 January 2024.</li> <li>Phase 2a – Development Application: Early works DA (PAN-426243) lodged with Blacktown City Council to seek consent for tree removal, earthworks and remediation.</li> <li>Phase 2b – Development Application: 5MW Data Centre DA to be lodged with Blacktown City Council to seek consent for a 5MW data centre and associated site works.</li> <li>Phase 3 – State Significant Development Application: Detailed design of the 504 MW data centre facility including buildings, substation, civil works and associated landscaping.</li> </ul>
SSD Trigger	The data centre facility will have a capacity of 504MW, triggering the proposal as State Significant Development under Clause 25 of Schedule 1 of <i>State Environmental Planning Policy (Planning Systems) 2021</i> .
Expected EDC	\$1,400,000,000
Staging	No staging is proposed.
Proposed Works	<p>An overall summary of the proposed development is provided below:</p> <ul style="list-style-type: none"> <li>Minor earthworks</li> <li>Construction of six (6), four (4) storey data centre buildings, each containing 24 data halls, 40 generators and ancillary office space resulting in the following total floor areas for the development: <ul style="list-style-type: none"> <li>Approx. 255,108sqm of gross floor area for data centre</li> <li>Approx 8,250sqm of gross floor area for ancillary office space</li> </ul> </li> <li>A 720MW substation</li> <li>Associated hardstand, circulation areas, security fencing and landscaping.</li> </ul>
Hazardous Materials	<p>Approx. 8.8million litres of diesel fuel stored on site</p> <p>Approx. 2,304 tonnes of lithium ion batteries.</p>





**FIGURE 3 – Concept Site Plan**

Source: EJE



**FIGURE 4 – Masterplan Massing**

Source: EJE



### 3. Relevant Legislation

On overview of applicable legislation relevant to the SSD is summarised below.

- Biodiversity and Conservation Act 2016
- Environmental Planning and Assessment Act 1979
- National Parks and Wildlife Act 1974
- Threatened Species Conservation Act 1995
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Planning Systems) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Precincts – Central River City) 2021
- Blacktown City Council Growth Centre Precincts Development Control Plan 2010

The site is zoned IN2 Light Industrial under Appendix 13 – Marsden Park Industrial Precinct Plan of the *State Environmental Planning Policy (Precincts – Central River City) 2021*.

The proposal is most appropriately defined as a 'data centre'. A data centre is a type of 'light industry', which is permitted with consent in the IN2 zone.

The supporting substation, generators, office space and civil works are ancillary to the proposed data centre buildings, required to service, operate and maintain the data centre use on the site.

Detailed assessment against the relevant provisions of the above legislation and planning documents will be provided within the supporting EIS.

### 4. Environmental Considerations

Following advice provided from DPHI, a project specific SEARs is being requested. Environmental considerations relevant to the proposed development are identified below, with key issues highlighted in **bold** and further discussed below.

- Accessibility
- **Aboriginal Cultural Heritage**
- Air Quality
- Arborist
- Architectural Design
- BCA Compliance
- **Biodiversity**
- Bushfire
- Civil Design
- **Consultation and Engagement**
- Construction Management
- ESD including NABERs
- Geotechnical, salinity and groundwater
- Landscape
- **Noise and Vibration**
- **Risk Assessment**
- Traffic
- Social Impact Assessment
- Waste
- Visual Impact Assessment

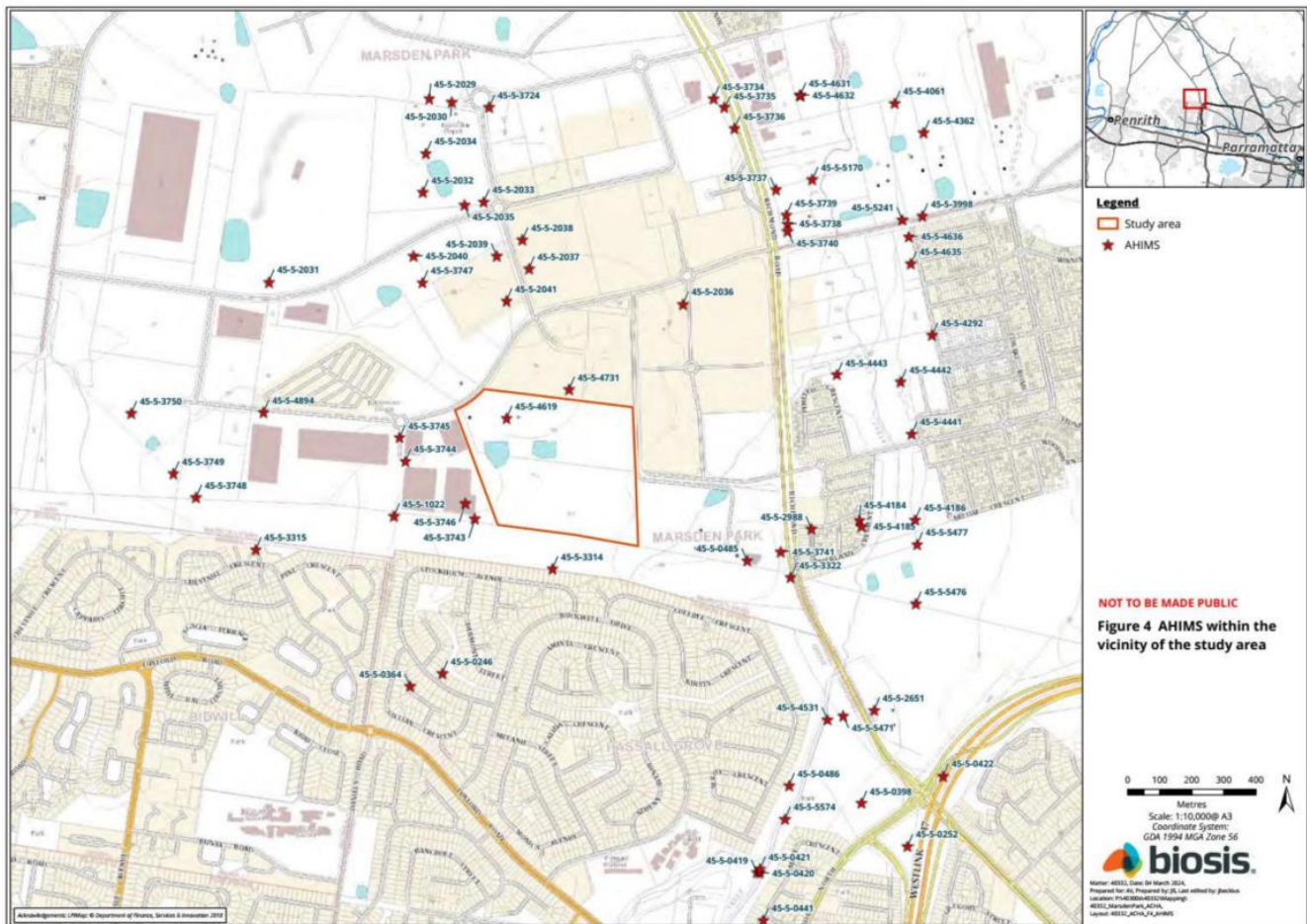




## Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) (reference CDCDC01HER, dated 30 April 2024) was submitted to Blacktown Council to support the early works DA (PAN-426243) on the subject site.

The review of the Aboriginal Heritage Information Management System (AHIMS) identified one (1) associated area of Potential Archaeological Deposit (PAD) (AHIMS site ID #45-5-4619), within the study area, as shown in the figure below.



**FIGURE 5 – Plot of registered AHIMS sites**

Source: Biosis 2024

Due to the findings of the AHIMS, the proposed development has been categorised as integrated development. Consultation has been undertaken with Deerubbin Local Aboriginal Land Council and Registered Aboriginal Parties (RAPs).

Based on background research, register searches, Aboriginal community consultation and two site visits, it has been determined that the study area holds little to no surface and subsurface Aboriginal archaeological potential, given the widespread historical disturbance across the site.

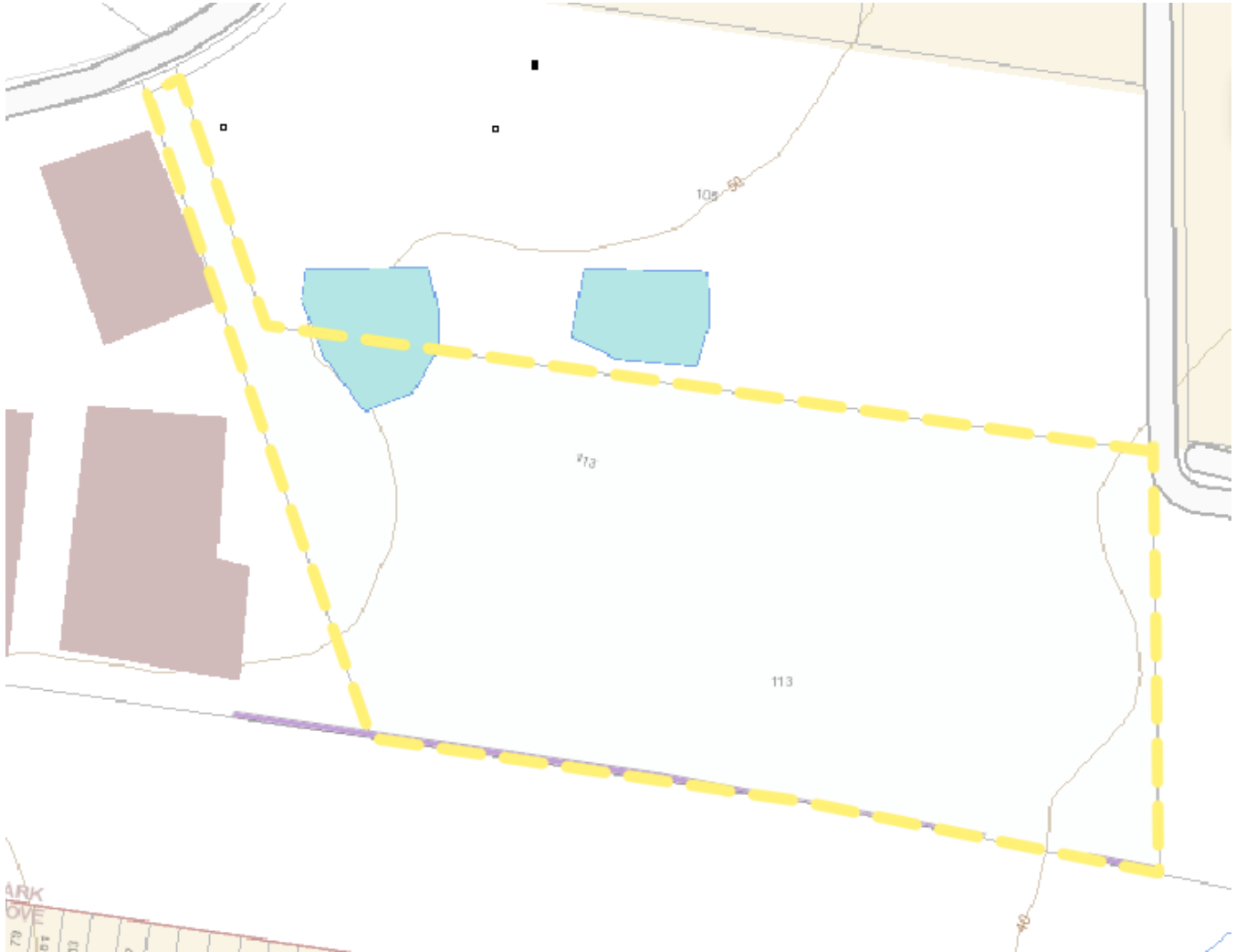
The ACHAR concluded that, subject to implementation identified recommendations, the proposed development is considered to be satisfactory from an Aboriginal cultural heritage perspective and Council and Heritage NSW can be satisfied that the anticipated impacts have appropriately been considered.

In relation to the SSD, it is envisioned that the same ACHAR report will be submitted with the SSDA package. Based on the construction timeline and program, it is anticipated that works will have commenced ahead of the determination of the SSDA and the relevant approvals from Council will be

obtained. Mecone and CDC will keep the Department abreast of any progress associated with aboriginal heritage matters as they arise.

## Biodiversity

The entire site, except for a small slither of land along the southern boundary, was biodiversity certified per Section 126H of the *Threatened Species Conservation Act 1995*, made under the Order to confer biodiversity certification on the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* dated 11 December 2007. This same slither is also identified as containing biodiversity values under the *Biodiversity and Conservation Act 2016*. An extract of the slither is provided below.



**FIGURE 6 – Biodiversity Mapping**

Source: NSW Planning Portal Spatial Viewer

All trees within this slither are to be retained to provide a visual buffer to the residential development to the south of the freeway extension corridor. Consent for tree clearing across the rest of the site is sought under the early works DA recently lodged to Blacktown City Council. No vegetation will be located within the development footprint of the SSD application, with no trees to be removed under the application.

Separately, we have lodged a mapping review request with the Department Climate Change, Energy, the Environment and Water (Application #: 00047771) to review the mapping of this slither. It is suspected that it may be a mapping overlay error in association with the Castlereagh Freeway corridor immediately adjacent to the boundary.

A BDAR Waiver will therefore be lodged with the SSD Application, and no further assessment required.



## **Consultation and Engagement**

Astrolabe have been engaged to prepare an Engagement Report and Social Impact Assessment (SIA) to support the SSD. The site adjoins the Baitul Huda Mosque to the east, while residential properties in Hassall Grove to the south of the Castlereagh Freeway. Vegetation buffers will be retained to both the southern and eastern boundaries wherever possible to reduce environmental impacts to these receivers. A summary of the proposed engagement strategy with the broader locality however is provided below.

### **Engagement**

A Stakeholder and Community Engagement Strategy will be developed as part of the preparation of the EIS. The objectives of the Engagement Strategy is to create awareness of the proposal, respond to stakeholder feedback and understand stakeholder views.

Key stakeholders that may be engaged include:

- The relevant Department assessment team
- Blacktown City Council
- Transport for NSW
- Sydney Water
- Ausgrid
- Department of Climate Change, Energy, the Environment and Water
- Fire & Rescue NSW
- Neighbouring residents, businesses and community groups

Additional stakeholders may be identified in preparation of the EIS, in alignment with the Department's guidelines that ensures engagement is proportionate to the scale and impact of the proposal.

Engagement methods proposed include informational flyer letterbox drop, community website and online survey, and letters to surrounding residents, businesses and community groups. An Engagement Outcomes Report will be prepared to accompany the EIS.

### **Social Impact Assessment**

The Social Impact Assessment (SIA) will be prepared to accompany the EIS and in accordance with the Department's Social Impact Assessment Guideline for State Significant Projects. The report will assess the impact of the proposal on the relevant categories, which may include way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods, and decision-making systems.

The SIA will be informed by the outcomes of the Stakeholder and Community Engagement Strategy and results of technical assessments. The report will highlight positive and negative impacts of the proposal, and relevant mitigation management measures.

## **Noise and Vibration**

Northrop have been engaged to undertake a Noise and Vibration Report to support the SSD. Both CDC and Northrop have previous experience in the design and assessment of data centres under the SSD pathway and have been working to design appropriate mitigation strategies.

As requested by DPHI, Northrop will request a meeting with the relevant DPHI team to discuss the appropriate noise assessment methodology and appropriate design mitigation measures that should be adopted for the project.

## **Risk Assessment**

Due to the scale of the proposed development many generators, batteries and associated diesel tanks will need to be provided on site. Vector Alliance have been engaged by CDC to prepare the relevant Risk Assessment Report to support the SSD. Key estimated development statistics related to the proposal are summarised below:





## Generators

There will be 40x generators per building. A common enclosure will contain two generators, with an above ground belly tank of 74,800L that serves both generators. Therefore, each building has 20x double stacked generators, resulting in ~9 million litres of diesel fuel stored on the site spread equally over 6 locations.

Sections and general arrangement plans from other CDC sites have been provided under separate cover to give DPHI an indication of the proposed generators on site.

## Diesel Storage

Diesel will be stored in double-skinned, above-ground stationary tanks or within the proposed generators. Bulk diesel storage will include a double-skin fuel tank, which is designed to store at least 110% of the maximum diesel volume stored therein. Each generator-tank system will contain a remote filling station, with built-in level indicators, visual and audible alarms, and a remote e-stop. The generator controller monitors leaks in the generator enclosure - if a leak is detected, the generator system will automatically shut down.

The diesel tanks will be separated from the buildings by 7m to comply with AS 1940 requirements.

## **4. Conclusion**

We trust the information contained within this letter assists the Department with a comprehensive understanding of the proposed development to facilitate the issue of Industry Specific SEARs. See attached reports as appendices:

- Appendix A: Concept Masterplan
- Appendix B: General Arrangements for generators and diesel storage

We look forward to working with the Department to enable the development of this proposal. Please don't hesitate to contact me on 0405 505 228 or at [gsedgmen@mecone.com.au](mailto:gsedgmen@mecone.com.au) if you have any questions.

Kind regards,

Georgia Sedgmen  
**Western Sydney Practice Director**

# Appendix A – Concept Plans