

PLANNING & INFRASTRUCTURE
Planning Unit

30 November 2022

Shaun Williams
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Industry Assessments
NSW Department of Planning, Industry & Environment
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PARRAMATTA NSW 2124

Dear Shaun,

SSD-13475973 STATE SIGNIFICANT DEVELOPMENT – MOWBRAY ROAD DATA CENTRE – 706 MOWBRAY ROAD, LANE COVE NORTH

I refer to the exhibition of the state significant development application for a proposed data centre at 706 Mowbray Road West at Lane Cove North. It is noted that the site is located on IN2 Light Industrial zone land in Lane Cove LGA on the border with Willoughby LGA in close proximity to existing medium and low density residential areas.

It is acknowledged that the Proposed Development would promote the enhanced development of the Sydney Metropolitan Region, providing for employment opportunities and an advanced data storage facility (i.e. Data Centre) to support the growth and development of IT infrastructure across the State in close proximity to the Sydney CBD.

Furthermore, the proposed Data Centre would operate on a 24/7 basis over four levels (including a basement level). The proposed Data Centre is considered State Significant Development pursuant to the Planning Systems SEPP with an estimated 38.9 MW (with a 28.8 MW IT load), for which the Data Centre comprises a total of 11,338 m² GFA.

BULK AND SCALE AND VISUAL IMPACT

Council is concerned that the height of the proposed development varies in height from 20.9 m to 29.695m across the site. Concerns also include the proposed bulk and scale of the proposed building which is in close proximity to low density residential areas. It is noted that this is a significant variation from the 18m height limit under the Lane Cove LEP for the IN2 Light Industrial zone.

The Environmental Impact Statement (EIS) states that the architectural design proposes a uniform and flat roof for each major part of the overall building, which will conceal the proposed plant and equipment., It also states that the building will attain a height of 20.9 m closest to Mowbray Road West and 29.695 m to the rear of the Site at the highest point. While this is a reduction of the previously proposed maximum height of 38m, it is still considered that it will have a significant visual impact on nearby residential areas. The building bulk, scale, design and colours is a significant concern to the Council and local residents. It is considered that the building could be constructed with greater visual interest and provide some colour and material variation and other innovations such as green walls could be considered to reduce its visual impact and dominance in the neighbourhood. The

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use of a colour palette of grey and black does not assist in reducing any heat island impacts which all new development should try to address.

OTHER IMPACTS - DIESEL FUEL POOR CHOICE OVER ALTERNATIVE ENERGY SOURCES

In addition to visual impacts to nearby residential areas, there are impacts regarding traffic, parking, lighting, privacy and acoustic impacts from the proposed development. It is noted also that there is an existing childcare centre in the industrial area immediately to the west of the site which will also be impacted.

There is also a proposed total of six (6) bulk fuel tanks and 13 day tanks with a total of 402.6 kL or 342.2 tonnes of diesel fuel associated with the arrangements for back-up power. The Proposal also includes provision for a total of 169 lithium-ion battery cabinets, with a combined weight of 48.8 tonnes. The proposed development was found to be below the threshold for classification as potentially hazardous industry in terms of both storage and transportation and therefore a preliminary hazard analysis is not required.

Council is however concerned regarding the storage of fuel on site due to its location close to residential areas and a childcare centre. Council notes that alternative energy sources to diesel fuel were investigated, such as solar power and battery storage options being assessed for the proposal. The assessment found that diesel fuel is considered the most appropriate solution to meet the data centre demands however this would seem to be a poor choice and a regressive conclusion, out of step with the State's ambitions to move to net zero emissions by 2050.

Council notes that the relevant environmental assessments of the proposal have been undertaken. It is also noted that the site is identified as bushfire prone and that a bushfire assessment has been undertaken as part of the environmental investigations.

Recommended conditions for a range of environmental aspects of the proposal are included in the attachment to this letter.

Operational jobs generated by the proposed development are estimated at 56 full time jobs, with construction jobs generated by the development anticipated to be in the order of up to 150 full time jobs.

TRAFFIC AND PARKING

It is noted that the site adjoins Mowbray Road, which is zoned SP2 Infrastructure Classified Road. Additionally, the Lane Cove Tunnel (M2 Motorway) intersects the site, for which consultation with Transport for NSW (TfNSW) and Transurban has been undertaken. It is understood that the proposed development has taken into account considerations for developing the site in close proximity to key infrastructure.

The Traffic Impact Assessment prepared by ARUP (2022) demonstrates, that the Proposed Development can operate at a satisfactory Level of Service 'B' and 'C' for the AM and PM peak periods, for which there would be no adverse impacts anticipated on the local and regional road network (refer to Appendix 11).

Due to the constrained nature of the site and the operational requirements pertaining to Data Centres comprising a low operational requirement for parking, approximately 30 car parking spaces have been proposed for use of the Data Centre staff including two (2) disabled spaces. A total of 30 car parking spaces are proposed within a central car parking location adjoining the 'front of house' entry. An additional 12 spaces are provided adjoining the childcare centre; however, these will not be utilised by the future staff of the Data Centre, rather by the childcare centre to support its continued operation, for which the

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construction of these 12 spaces is being undertaken in a separate Development Application.

The existing site has 42 parking spaces which would meet the staff parking needs (based on the adjusted multimodal trip generation model) of 43 private vehicles parking. However, the proposal is proposing to reduce the parking supply to 30 and provide 12 spaces to adjacent Childcare centre. It is not clear the 12 parking spaces are for parents' drop-off and pick-up or for staff parking (the use can vary in terms of traffic generation in the peak periods).

Council does not have any objection to the parking spaces re-allocation to the childcare centre, as long as the Data centre parking needs are contained within the site, including through various sustainable travel initiatives and measures (i.e. Green travel plan, shared car travel, incentivise staff using public transport, encourage active transport walking and cycling and provision of end of trip facilities). Ongoing evaluation and monitoring on staff travel to work trips will be required to ensure the staff parking needs stay within the provided parking spaces. This will reduce overall traffic generations/parking needs to the area and streets.

It is noted that during construction period, truck traffic/movements will increase to/from the site. All measures should be considered to reduce/minimise the truck movements/volumes during AM and PM peaks and ensure road safety audits are completed to maximise public safety, as the site is directly adjacent to residential areas/streets, public transport corridors, cycle paths and a childcare centre. To that end, it is recommended that a Traffic and Parking assessment be submitted to address these issues.

LANDSCAPING

In relation to proposed landscaping, the Landscape Plans and Visual Assessment report prepared by Habit8 are noted. The Visual report in its 15-year scenario relies heavily upon the growth of tall canopy trees along the Mowbray Rd frontage of the site to mitigate visual impacts in relation to the surrounding sites. It is considered that the greatest impact will be on the R2 Low Density Residential Zone on the opposite side of Mowbray Road in the Willoughby Council area.

The Landscape Plans show 20m native canopy trees located in the setback to Mowbray Road. The plans indicate that 20m native trees would typically have a canopy spread similar to the height at maturity (i.e. 20m).

The landscape plans indicate a 5.9m landscape zone with tiered retaining walls. It is difficult to understand how trees can develop to full maturity in restricted growth areas proposed and how canopies can develop adjacent to the building and existing power lines.

Concern is raised therefore as to the effectiveness of the proposed tree planting in mitigating the impacts of the building proposed. By comparison, the Mowbray Public School at 635 Mowbray Rd provides a minimum 15m setback to the three storey buildings fronting Mowbray Road.

Given the height and bulk of the proposed building, a similar setback (i.e. 15m) would be recommended to enable growth of canopy trees in order to provide a physical setback to the building bulk and enable the level of visual impact mitigation described in the Visual Assessment. In the absence of such setback, the proposal should at least provide planting in the setback matching the footpath levels (i.e. no grading down toward the building) with only a single retaining wall to the building frontage. This would provide a higher base level for planting to provide screening and a greater soil volume to enable tree development.

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It is noted that there appears to be no opportunity for any planting along the eastern façade of the building, leaving a large blank wall visibly evident from surrounding streets and residences.

CONCLUSION

In conclusion it can be seen from the foregoing that Council has identified a number of aspects of the proposed data centre that require further attention but appreciates the opportunity to comment on the proposal as it currently stands. Please contact Ian Shillington in the first instance on 9777 7620 or Ian.Shillington@Willoughby.nsw.gov.au if you require further information in relation to Council's comments.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'MN', with a stylized flourish extending to the right.

MITCHELL NOBLE
HEAD OF PLANNING