



Your ref: SSD-47320208
File no: MC-23-00004

5 July 2023

NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

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

Attention: Shaun Williams

Dear Mr Williams

SSD-447320208 – Project Echidna Data Centre, Eastern Creek

Thank you for your correspondence dated 7 June 2023 requesting our advice on the proposed Data Centre at 10 Eastern Creek Drive, Eastern Creek which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we object to the proposal until all our issues listed in the Attachment to this letter are addressed in a revised Environmental Impact Statement and amended plans. We request that the information required is referred back to us for reconsideration before any determination is made.

If you would like to discuss this matter further, please contact Coordinator Development Assessment, Alan Middlemiss on 9839 6146.

Yours faithfully

Judith Portelli
Manager Development Assessment

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown Council's submission to SSD-47320208 – 10 Eastern Creek Drive Project Echidna Data Centre

1. Planning issues

- a. The applicant must clarify the following in relation to car parking and staff numbers:
 - Eastern Creek Precinct Plan requires buildings greater than 7500 m² at the rate of 1 space per 100 m² of gross floor area (GFA) and 1 space per 200 m² GFA only for the area in access of 7500 m², plus, 1 space per 40 m² GFA for the office component.
 - The Traffic Impact Assessment states that the maximum number of staff/customers on the site includes 50 employees and 10 visitors per day. There are only 64 car spaces approved for the whole site and 6 additional car parking spaces proposed. The total number of parking required for the proposed data centre alone is 84.
 - We are not satisfied that sufficient parking has been provided on-site. The applicant is relying on shared parking for the whole site. However, combined cumulative impact of the parking requirement of all buildings on site, when functional, has not been appropriately addressed.
- b. A building height of 22.26m has been approved under SPP-19-00013 for Building 1, and also for the concept Building 2 (proposed data centre). The proposed building height is 25m, exceeding the concept approval. A height difference of 2.74m at this scale is significant. The applicant must provide revised elevations to re-consider the context of the proposed data centre in relation to the approved buildings on site.
- c. The proposal seeks to fill ground levels higher than the previous existing ground levels. The proposed ground level (70.00m) of the data centre is 1.1m higher than the ground level (68.90m) approved under SPP-19-00013 and subsequent modifications. The finished floor level of the centre should be dropped to reduce the overall bulk of the centre and decrease the impact on views in the area.
- d. The applicant must provide shadow diagrams for us to consider the shadow impacts.
- e. The applicant must provide a revised site plan to indicate all the approved setbacks on plan.
- f. Screening for the proposed data centre to the east and north is not satisfactory:
 - The proposal to remove the approved median landscape zone between the proposed data centre and future substation, Building 1A and Building 1 is not supported.
- g. DA-20-01387 was approved on 23 December 2020 for installation of 4 temporary electricity kiosks within the front landscape setback of the proposed data centre. The applicant must address the relevance of that consent within the proposed development.

- h. The applicant must address urban heat in the context of Western Sydney's climate. In this regard:
- it must be demonstrated that the roof of the data centre and associated buildings will utilise high albedo and high reflective emittance roofing materials in accordance with Blacktown City Council's Responding to Climate Change Strategy (<https://www.blacktown.nsw.gov.au/About-Council/What-we-do/Environmental-Plans-and-Policies#section-2>).
 - internal roads and hardstand surfaces must also utilise high albedo and high reflective emittance colours and materials.
 - additional tree planting shall be provided around the car parking areas.

2. Natural areas and biodiversity issues

- a. Hardstand site coverage with this proposal is approximately 9,225m². This, on top of previously approved development across the lot, would result in very small areas on site available for landscaping or outdoor communal areas, and minimal areas of deep soil available for trees to provide shade and ameliorate heat. Concern is therefore raised to the high proportion of hardstand, building and road coverage on site with the addition of the data centre as proposed. Opportunities to increase lot boundary setbacks, increase distances between buildings and plant trees in car parks should be explored.
- b. Open car parking areas should be landscaped to reduce the impact of hard paving. Established tall trees with wide-spreading foliage provide desirable shade and reduce the effects of heat in open car parking areas at a ratio of one (1) tree per three (3) carparks at minimum container size of 45L at the time of planting.
- c. The applicant must provide a Soil and Water Management Plan for implementation prior to the construction of the development, with adequate erosion and sediment control measures implemented.

3. Drainage issues

Council's Drainage Engineering section does support the application due to the following reasons:

- a. Water quality
- i. No MUSIC model has been provided for assessment. The submitted report stated that the reduction target of nitrogen is less than Council's required target. The design must be amended to achieve the reduction target.
 - ii. No design details of the proposed GPT was submitted with the application. The connection and the functionality of the GPT is unclear.
 - iii. The application also proposed to connect to the existing water quality filter chamber within the lot. The chamber details were referred to drawing AUR-XX-

XX-DR-C6062 & 6027. However, these drawings were not submitted. Furthermore, the applicant must demonstrate the capacity of the existing chamber is sufficient to capture this development.

- b. Water Conversation
 - i. Water conservation is required for this development. A rainwater tank is required to meet the water conservation target under part J of Blacktown City Council's DCP/ A minimum 80 % of non-portable water demand for the development is to be met through the reuse of rainwater. The non-portable water supply shall be separated with any other water supply including the cooling facility.
- c. Drainage
 - i. Detailed roof and gutter plan shall be provided.
 - ii. DRAINS model shall be provided to confirm the drainage design and the connection in to Council's easement.
 - iii. Any amendment to Council's trunk drainage needs to be approved by our Asset Maintenance team.

4. Environmental health issues

- a. The applicant must provide a revised noise and vibration assessment which includes modelling the worst-case scenario in relation to emergency operation.

5. Traffic issues

- a. The applicant must provide a parking layout plan to assess compliance with Australian Standards.