



28 February 2022  
Department of Planning and Environment

**SUBMISSION ON BEHALF OF [REDACTED] IN RELATION  
TO THE DRAFT CAMELLIA-ROSEHILL PLACE STRATEGY**

[REDACTED] have prepared this submission in response to the draft Camellia-Rosehill Place Strategy (the Place Strategy) on behalf of [REDACTED] who is the owner of 8-10 Grand Avenue, Rosehill (the site).

The subject site is currently being developed for the purposes of a data centre campus, approved by the City of Parramatta Council under DA/751/2019. Upon completion, the site will host two separate data centre facilities and comprise a combined GFA of approximately 29,000sqm, carparking, landscaping and associated power infrastructure. Overall, the development will have a total value of approximately \$500 million.

This submission follows our original submission made in October 2021 to the Directions Paper for the Place Strategy and requests a number of minor changes to the Place Strategy prior to finalisation

In particular, this submission makes the following requests:

- **Future transport network:** We request that the transport corridors shown within Figure 9 and other figures throughout the strategy be revised so that they no longer encroach on the subject site along the eastern, western, and southern boundaries. As outlined within the Schedule to this document, the road in this locations conflicts with development approved under DA/751/2019, which is under construction at the site.
- **Proposed height controls:** We request that the final Place Strategy provide flexibility in relation to height in the urban services sub-precinct to allow for buildings to exceed the nominated height limit in certain circumstances where strategic and site-specific merit can be demonstrated. Such flexibility will allow for the data centre on the western portion of the site to be redesigned to accommodate plant on the rooftop, as opposed to within the gantry structure adjacent.



We thank you for your consideration of this submission and welcome the opportunity to meet with the Department again should it be required. In addition, should you wish to discuss or have any queries in relation to matters contained within this submission, please do not hesitate to contact me on [REDACTED] or [REDACTED]

Kind Regards,

[REDACTED]

[REDACTED]

**Director**

[REDACTED]

# SUBMISSION ON BEHALF OF [REDACTED] AUSTRALIA IN RELATION TO THE DRAFT CAMELLIA-ROSEHILL PLACE STRATEGY

## 1. Site and Project Overview

The subject site is known as 8-10 Grand Avenue, Rosehill NSW and legally referred to as Lot 2 DP 1258587. The site is located within the Parramatta LGA on a land parcel approximately 4.27 hectares in size with a legacy of industrial use.

The subject site is currently being developed for the purposes of a data centre campus in accordance with DA/751/2019 approved by the City of Parramatta. Upon completion, the site will host two separate data centre facilities and comprise a combined GFA of approximately 29,000sqm, carparking, landscaping and associated power infrastructure.

Figure 1 and Figure 2 below depict the site within the context of Rosehill and the development approved.

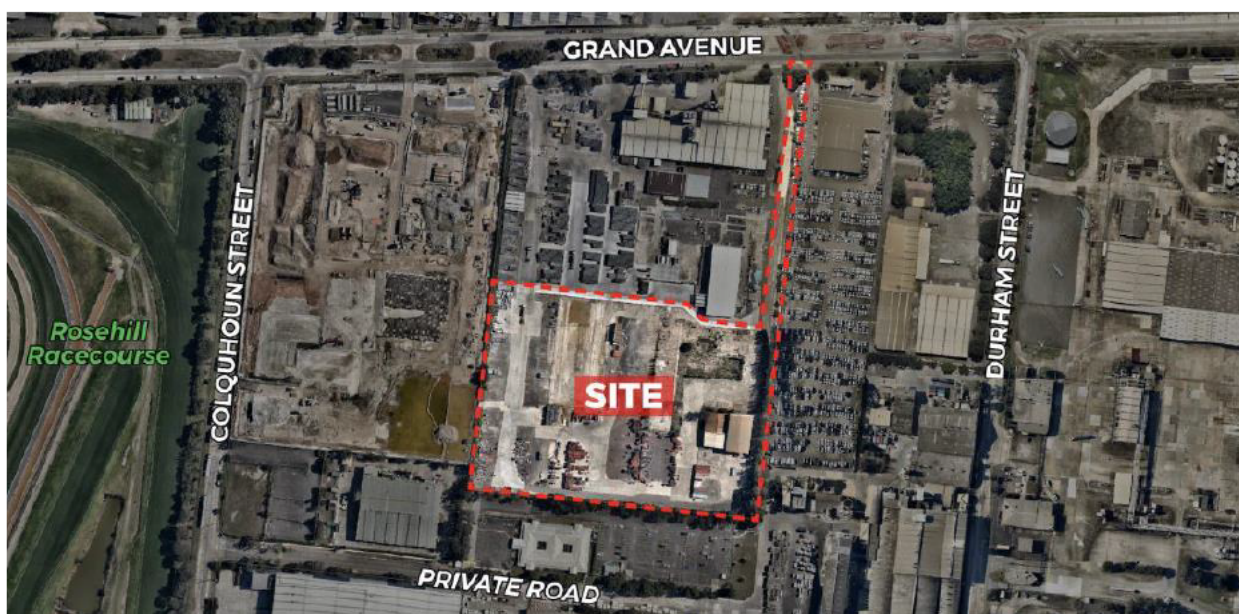


Figure 1 – Site Plan

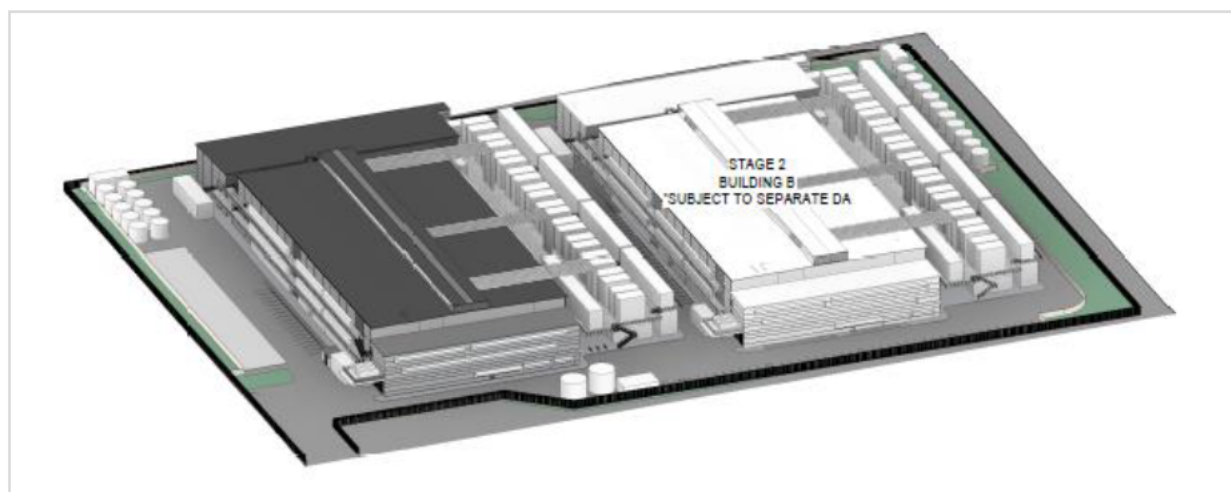


Figure 2 – Proposed Future Development at Site (viewed from north)



## 2. Nature of Previous Submission on Directions Paper

As outlined in our submission in October 2021, [REDACTED] are broadly supportive of the directions and vision for the Camellia-Rosehill Precinct. However, our previous submission raised concerns with some finer grain details, which are reiterated in the table below. The below table also outlines how the draft Place Strategy has been updated in response to the issues which were raised in our previous submission.

Directions Paper Issue	Detail of Previous Submission	Draft Place Strategy Response
Future Transport Network Under Direction 3	Concern was raised with relation to the future transport network shown under Direction 3 of the Directions Paper.  Specifically, new roads were shown dissecting the site, which were incompatible with the approved DA.	Road locations have been revised in the draft Place Strategy but remain incompatible with the development approval for the site as they continue to encroach on the land. They will therefore conflict with servicing infrastructure and internal vehicular circulation required for the proper functioning of the future development at the site.
Boosting Economic activity and employment opportunities under Direction 2	Request was made to remove the existing 12m height limit which applies to the site and the industrial area more broadly.	The draft Place Strategy identifies that urban services land will have a maximum height limit of 20m.

## 3. Matters for consideration prior to finalisation of the Place Strategy

Whilst we recognise DPE has made some changes to the draft Place Strategy for Rosehill-Camellia since the Directions Paper was exhibited, we request that further changes be considered prior to finalisation of the Place Strategy. Requested changes are explored further under the headings which follow.

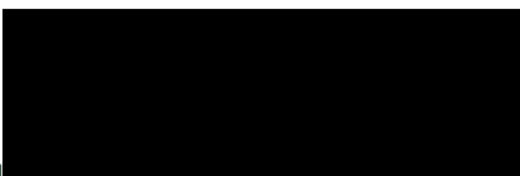
### Proposed Road Network

The draft Place Strategy identifies several additional transport corridors and roads under Strategic Direction 3 (Figure 9), which appear to continue to encroach upon the subject site. This proposed network is replicated across all other figures within the draft Place Strategy.

Although DPE revised the proposed network since the Directions Paper, it continues to affect the site with:

- A new north-south active transport corridor, bus corridor and road along the eastern boundary of the site, connecting into Grand Avenue;
- A new north-south road along the western boundary of the site, connecting into Grand Avenue; and
- A new east-west road along the southern boundary of the site, connecting Colquhoun and Durham Streets.

We continue to have concerns with, and strongly object to, the future road network shown in Figure 9 of the draft Place Strategy given its incompatibility with [REDACTED] plans for the subject site approved under DA/751/2019. As displayed in Figures 3-5 below, the



abovementioned transport corridors directly encroach on internal circulation areas, and servicing infrastructure such as generator buildings, and diesel storage tanks, all of which are required for the proper functioning of the future development at the site. On this basis, they are not viable in their current locations.



Figure 3 – Proposed Road Network (Site Shown in Red)



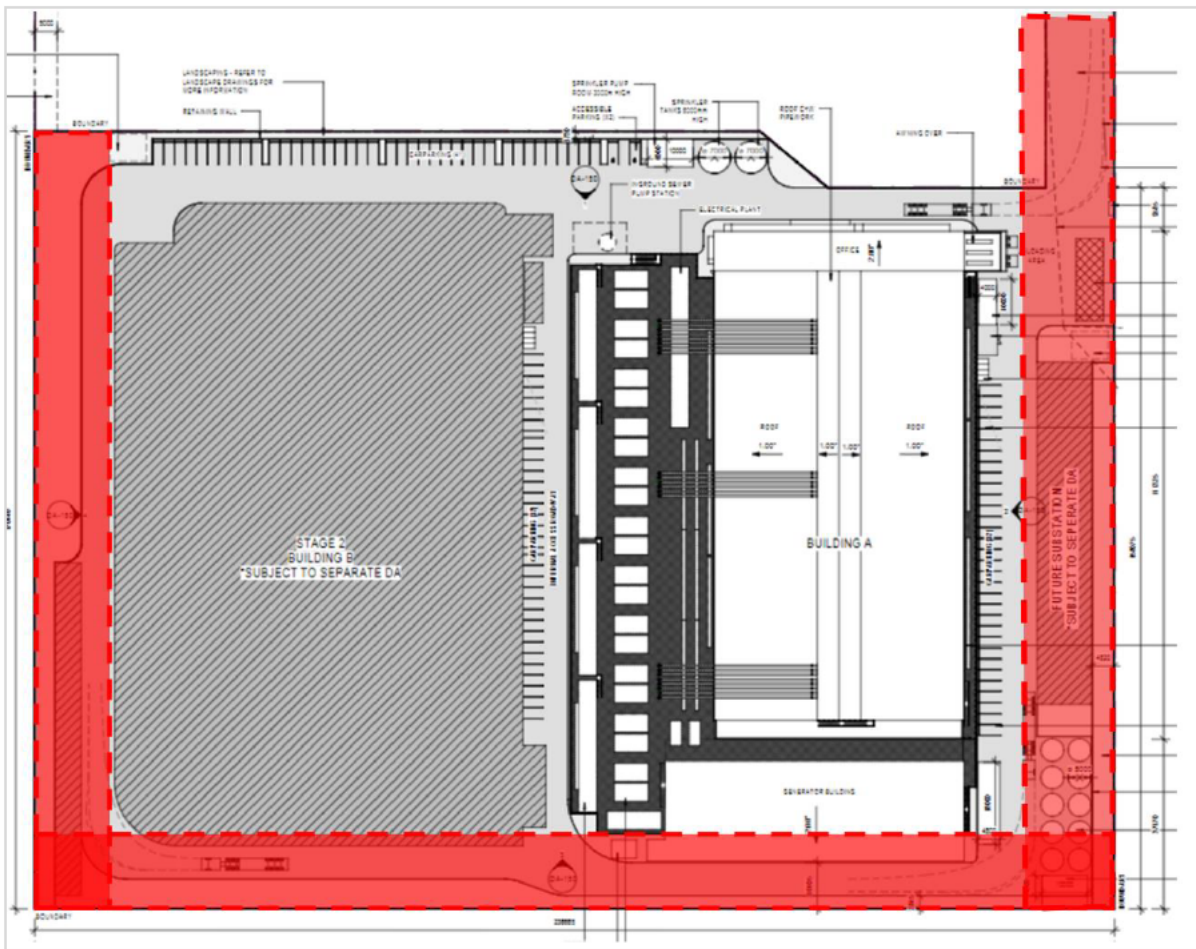


Figure 4 – Overlay of proposed transport corridors on approved [redacted] development currently under construction (Approximate location only)

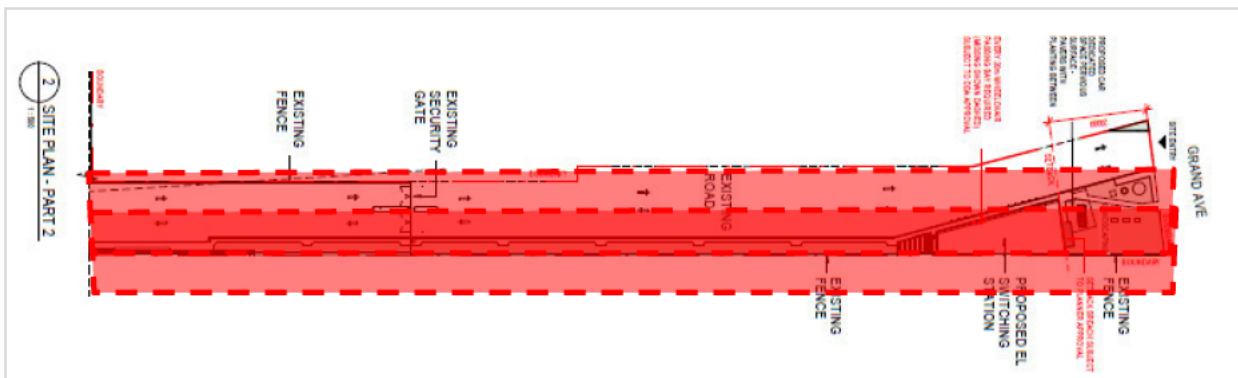


Figure 5 – Overlay of proposed transport corridors encroaching on the access handle which contains private power infrastructure and easements (Approximate location only)

In our recent meeting to discuss our concerns regarding this matter, DPE advised that the road patterns are indicative only, subject to further refinement, and ultimately reflective of a long-term vision. Notwithstanding, given the clear inability for the road network to be provided in the above locations due to the [redacted] development, it is not rational to have the roads remain in these locations. Further, [redacted] plans for development are long term, and require that certainty be provided by government as to the intentions for the site and immediate surrounds.



## Proposed Height Limits

The draft Place Strategy expands upon the Directions Paper by providing greater clarity on intended future planning controls, including heights, within the precinct. For the Urban Services land category, this includes:

- A proposed E3 - Productivity Support zoning;
- A maximum building height of 20m; and
- An FSR of 1:1.

We commend the Department in providing for height limits in this zone above that currently permitted in the Parramatta Local Environmental Plan 2011 of 12m, which we are of the opinion unnecessarily restricts development opportunities within the locality and limits the ability to provide good planning outcomes.

However, although supportive of the height increase in general, we suggest that 20m is limiting in the context of the broader vision for Camellia-Rosehill and the intent of the urban services precinct to support uses in innovation and emerging technologies. We believe that allowing further building height flexibility would ensure:

- **Optimised constructability and efficiency:** A more relaxed height control would ensure the planning framework facilitates optimal development from a constructability and efficiency perspective. In the case of the subject site, a more flexible height control would enable supporting mechanical and electrical plant equipment to be sited on the data centre's rooftop as opposed to the adjoining yard. This would be preferred from both a cost, efficiency, and operational perspective by [REDACTED]
- **Increased amenity and landscaping provision:** More flexibility in relation to height across the Precinct would enable greater amenity by allowing building site coverage to be reduced and more expansive landscaping and open space to be provided within developments;
- **Land underutilization does not occur:** A more relaxed height control would ensure that the nominated floor space ratio could be achieved and minimise underutilization of land across the precinct;

We also note that precedent exists for height limits exceeding 20m in current B5, B6, and B7 zones (which the proposed E3 Zone is most similar to) across Sydney, such as in Blacktown (32m), Casula (30m), Castle Hill (27m) and Leppington (24m). These areas are adjoined by lower density built forms and/or planning controls than that proposed in the Town Centre of Camellia.

Taking into consideration the above, we provide three options in relation to proposed height limits within the Place Strategy for DPE's consideration:

- Option 1: The height limit for the urban services sub-precinct is increased to 26m across the board;
  - Option 2: A site-specific reference be introduced which allows for data storage premises at the subject site to be construct to a height of 26m where it enables concealment of plant on the rooftop;
  - Option 3: The final Place Strategy explicitly identifies the potential for taller buildings to be allowed on urban services zone land above the 20m height limit, where it is to facilitate bespoke architectural requirements of non-traditional industries such as data centres.
- [REDACTED]

#### 4. Conclusion

This submission has been prepared by [REDACTED] on behalf of [REDACTED] and has outlined our continued remaining concerns with the draft Camellia-Rosehill Place Strategy and its relationship to the site at 8-10 Grand Avenue, Rosehill

Specifically, two minor changes have been requested for implementation into the Place Strategy prior to finalization, which include:

- Request that further amendment be made to the future road network prior to finalisation of the Place Strategy to ensure it properly reflects and avoids the approved Equinix development on the subject site. As demonstrated within this submission, the current roads which encroach on the site are unviable as they negate to consider Equinix future operations of the site; and
- Amendment to the proposed height of building control, by either:
  - Increasing the control to 26m across the urban services sub-precinct;
  - Introducing a site specific reference allowing heights to 26m for data centres; or
  - Explicitly identifying the potential for taller buildings where facilitating bespoke architectural requirements of non-traditional industries such as data centres.







**Subject:**

Webform submission from: Draft Camellia-Rosehill Place Strategy

**Date:**

Monday, 28 February 2022 8:25:22 PM

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Submitted on Mon, 28/02/2022 - 20:22

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

**Name**

**First name**

[Redacted]

**Last name**

[Redacted]

**I would like my submission to remain confidential**

No

**Info**

**Email**

[Redacted]

**Suburb/Town & Postcode**

2142

**Please provide your view on the project**

I object to it

[Redacted]

**Submission**

Please find attached a submission made on behalf of the owners of 8 Grand Avenue, Rosehill.

Kind Regards,

[Redacted]

**I agree to the above statement**

Yes