

To the City of Swan,

Submission - Proposed Hazelmere Data Centre (DA-6/2026), Lots 14 & 15 Stirling Crescent Hazelmere WA 6055

On behalf of Bibbul Ngarma Aboriginal Association Incorporated (BNAA), I am writing to provide the following submission on the proposed Hazelmere Data Centre. BNAA has a direct and longstanding interest in this site given its location on the Mandoon Bilya (Helena River), which is the focus of our Booryul-Bah-Bilya (BBB) program.

BBB is using the Mandoon Bilya to create a new model of river catchment management to mark the 2029 Perth Bicentenary, including establishment of the *Mandoon Bilya Riverpark*, a 250-hectare river restoration initiative from Guildford to Helena Valley.

On-ground works are already underway by our BBB Rangers team and community volunteers, including on the river reserve directly adjoining the site.

Lots 14 & 15 border the proposed Mandoon Bilya Riverpark and the existing Swan-Canning Riverpark, and sit within 40 m of the river channel.

The high environmental, cultural and community significance of the river imposes a high duty of care on any development proposal in this area.



Figure 1: Lots 14 & 15 Stirling Crescent (red) in relation to Mandoon Bilya Riverpark (green) and Swan-Canning Riverpark (crosshatch)

BNAA strongly opposes the proposed Hazelmere Data Centre. The development is:

- Fundamentally incompatible with the site's land use zoning and the HEA Structure Plan.
- Dependent on critical infrastructure that does not exist and is outside the proponent's control.
- Missing essential environmental, hydrological and engineering information.
- Incapable of proper technical assessment.
- A high-risk proposal for the river, nearby residents and the adjacent Helena River Steiner School.

Furthermore, the DA is incomplete and lacks the most basic site investigations, and therefore cannot reasonably form the basis for meaningful community consultation or informed decision-making.

1. Incompatibility With Special Use Zoning under LPS 17 and HEA Structure Plan

Lots 14 and 15 are zoned Special Use (No. 15) under Local Planning Scheme 17, which restricts development to uses specified in the Hazelmere Enterprise Area (HEA) Structure Plan for Precinct 2A – Helena River:

1. *Light industrial uses in the event of reticulated sewer being provided.*
2. *Promotion of institutional uses relating to education, health, research and recreation.*
3. *Provision of a road adjacent to and along the entire length of the Helena River to provide a high quality hard edge interface and continuous public access to the river reserve.*

The proposal satisfies none of these requirements.

Crucially, the site is not connected to reticulated sewerage. Under *Development Control Policy 4.1 – Industrial Subdivision*, development on non-sewered sites may only proceed where:

- The activity is strictly a dry industry; and
- On-site disposal is demonstrated to be sustainable long-term.

The DA does not demonstrate compliance with either criterion.

Given the lack of sewerage and the intensive water-dependent industrial processes proposed, the data centre is fundamentally incapable of approval and is effectively prohibited under both the LPS and the HEA Structure Plan.



2. No Viable Wastewater Disposal Solution

The DA confirms:

- The site is not connected to the sewer network.
- The nearest Water Corporation sewer main is a high duty bypass main that cannot service the development.
- Water Corporation has only a long-term, undefined plan for sewer connection to Stirling Crescent, with no established timeframe.

The HEA Structure Plan defines 'Dry Industry' as an industrial activity where wastewater can be safely disposed of on-site, without adverse environmental or health impacts, and at a rate not exceeding 540 L per 2000 m² per day.

The DA does not demonstrate compliance with this definition. It fails to:

- Quantify estimated wastewater volumes or chemical composition.
- Undertake any soil permeability, hydrogeological or geotechnical testing.
- Assess evaporative cooling 'blowdown' that would be discharged during the industrial process, including estimated volumes, salinity, and concentrations of dissolved solids and microbial loads.
- Demonstrate that on-site wastewater disposal adjacent to a freshwater wetland could be remotely safe.
- Provide any evidence that the proposal qualifies as a dry industry.

The DA's brief reference to a possible Aerobic Treatment Unit (ATU) is technically unviable because:

- ATU systems require a large dispersal area, which the site does not have.
- The site is underlain by shallow clay and silt, which significantly limit infiltration.
- The development does not maintain the mandatory 100 m separation distance from on-site dispersal and freshwater ecosystems – the Mandoon Bilya (Helena River) river channel sits within 40 m of the site.
- ATUs are designed for organic wastewater, not saline industrial effluent with high-dissolved solids.
- Disposal of saline wastewater directly adjacent to a Conservation Category Wetland (CCW) and freshwater river presents significant environmental risks, including soil degradation, vegetation die-off, and groundwater contamination.

The cooling-tower blowdown discharge alone would generate potentially millions of litres of saline, chemically enriched wastewater that cannot be safely disposed of on site. Without government sewerage or a viable on-site disposal alternative, the proposal fails to meet the minimum wastewater servicing requirements for industrial development under both state and local planning frameworks.

3. Unquantified and Potentially Massive Water Use

The DA does not quantify the volume of water required for the industrial process. Instead, it proposes an aspirational Water Use Efficiency (WUE) target of 0.1 L/kWh, without any explanation of how such a low figure would be achieved.

In the absence of Australian data, the DA also cites a 2025 study of European data centres, which found an average WUE of 0.58 L/kWh, and a range of 0.07 to 1.28 L/kWh across 458 facilities. Compounding this, the DA presents contradictory power-demand figures: 96 MW in one document and 120 MW in another.

Using a conservative assumption of 96 MW at 50% utilisation, BNAA has calculated the projected water use as follows:

At 50% Utilisation	WUE 0.07 kWh European Best-Case	WUE 0.1 L/kWh Development Target	WUE 0.58 L/kWh European Average	WUE 1.28 kWh European Worst-Case
Litres per hour	3,360	4,800	27,840	61,440
Litres per day	80,640	115,200	668,160	1,474,560
Litres per week	564,480	806,400	4,677,120	10,321,920
Litres per year	29,433,600	42,048,000	243,878,400	538,214,400

These estimates demonstrate that the development would use between 29.4 million and 538.2 million litres of water per year at only 50% capacity, and up to between 58.9 million and 1.1 billion litres per year at 100% capacity.

The DA provides no consideration of:

- How much of this water would be lost to evaporative cooling.
- How much water would be discharged as saline "blowdown" wastewater.
- How wastewater will be managed without sewerage or a viable on-site alternative.



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Perth is already subject to long-term reductions in rainfall, declining groundwater recharge, and increasing pressure on scheme water supplies. Against this backdrop, approving a high-water-use facility that will consume many millions of litres of water annually, without transparent modelling, independently verified water-use assumptions, or a credible strategy for handling saline wastewater, would be contrary to the State's established water-efficiency objectives. The uncertainty surrounding actual power demand further undermines the reliability of the DA's claimed efficiency.

4. No Technical Basis for Stormwater Management

The DA provides only a "preliminary" stormwater drainage plan, which does not meet the requirements under *State Planning Policy 2.9 – Water* and *Better Urban Water Management (BUWM)* guidelines.

BUWM requirements mandate site-validated topography and hydrological assessment for all developments that drain into sensitive water bodies. Those requirements include this proposed development, which is located within:

- The floodplain of Mandoon Bilya (Helena River).
- A DBCA-mapped multiple use and Conservation Category Wetland (CCW).
- An area with known shallow groundwater (1-2 m depth).
- An area with "known shallow clays and silts that impede water infiltration.

Critical gaps in the DA include the notably complete absence of:

- Geotechnical testing (a basic requirement for any development of this scale).
- Soil permeability assessment and infiltration analysis.
- Groundwater monitoring or end-of-winter water-table assessment.
- Topographical survey.

The DA relies on approximately 6,000 GRAF infiltration cells, yet provides no evidence they can be situated above the shallow groundwater or in the clay soils, which can reduce installation depth due to lateral loading.

There is also no consideration of how stormwater will be managed in relation to interaction with:

- Shallow groundwater known to be present under the site.
- Future wastewater systems and highly saline blowdown.
- Diesel storage and infrastructure for 88 large generators.
- Potential chemical or fuel spills.

The DA also fails to consider the presence of shallow limestone rock, which outcrops at the surface within 500 m of the site on the Mandoon Bilya floodplain, and may obstruct/alter subsurface drainage pathways and prevent the installation of GRAF cells.

All stormwater will ultimately flow to the Mandoon Bilya (Helena River) and adjacent Conservation Category Wetland (CCW), requiring a high standard of technical evidence. None has been provided. Without site-specific geotechnical and hydrogeological data, the DA cannot be assessed under *State Planning Policy 2.9*, and there is no technical basis for assuming that any future stormwater systems will be feasible, safe, or compliant with BUWM requirements.

5. Inconsistent and Unresolved Power Demand and Supply

The DA provides contradictory information on the development's power demand, with one document referring to 96 MW, whilst another identifies 120 MW to meet initial demands and unspecified "future scalability requirements".

The DA also fails to address how power supply will be serviced. Major issues include:

- Requirement for 88 diesel generators of unknown size and no consideration of fuel storage.
- Requirement for a new and dedicated 132 kV transmission line and on-site substation.
- No capacity at the existing Hazelmere substation to support the development.
- Identified risk of thermal overload at the Guildford Terminal.
- Connection to Western Power's Southwest Interconnected System (SWIS) cannot be confirmed.
- Need for prolonged Western Power negotiations and further assessments to develop a power-supply solution.

In short, the power supply for this development is not secured and cannot be assumed.



6. Fuel Storage and Risk

The DA includes no information on:

- Required diesel storage, volumes and filtration to service 88 generators of unknown size.
- Location, number and size of on-site fuel tanks.
- Bunding and other risk-control measures for fuel storage.
- Fuel transport to the site, including frequency and timing of deliveries.
- Spill-prevention and response plans for accidental release into the adjacent wetlands and river.
- Interaction between fuel storage and on-site stormwater/wastewater systems.

Given the site's location on the Mandoon Bilya (Helena River) floodplain and adjacent Conservation Category Wetlands (CCW), the immediate proximity of the river channel (within 40 metres), and the proposed on-site stormwater discharge towards the river, the absence of any fuel-related risk assessment in the DA is unacceptable.

7. Other Serious Risks not Adequately Addressed

Bushfire:

- The site is in a Bushfire Prone Area.
- The Bushfire Management Plan considers "fuel load" but ignores on-site diesel use and storage.
- The appointed BAL-29 rating depends on establishing an Asset Protection Zone (APZ) over an Aboriginal heritage site, which may not be permissible.
- No consideration of emergency response, bunding or contaminated runoff into the adjacent river during a fire, a known catastrophic risk following the nearby Bellevue Industrial Waste Facility fire in 2001 – one of Australia's largest hazardous waste fires which led to the installation of WA's first Permeable Reactive Barrier to stop contaminated fire-fighting water entering the Mandoon Bilya (Helena River).

Noise

- The noise impacts from 88 diesel generators and 64 evaporative cooled chillers will be substantial yet the acoustic report omits critical sensitive receptors, including a residence on Stirling Crescent that is located within 150 m of the site.

Lighting

- No assessment of night-time lighting impacts on wildlife or amenity.

Foreshore Management

- No Foreshore Management Plan.
- No assessment of river-edge interface, public access, or landscape impacts.
- No assessment of compliance with HEA Structure Plan requirements for public river access.

Air Quality, Heat and Emissions

- No assessment of emissions or heat-island effects from the diesel generators, cooling or industrial process.
- No assessment of impacts on air quality, including to the adjacent primary school.

Habitat Loss and Wildlife Impacts

- We have serious concerns about tree removal and subsequent loss of canopy and wildlife habitat, including foraging habitat for two protected species of Black Cockatoos – Carnaby's Black Cockatoos (Endangered) and Forest Red-Tailed Black Cockatoos (Vulnerable).

8. Scale and Precedent

The proposed 96-120 MW facility would be classed as a hyperscale data centre. It would be an enormous high-power facility that requires its own dedicated transmission lines and substation, and with sufficient capacity to power 60,000–90,000 homes. It would utilise many millions of litres of water a year.

The DA refers to the development as a 3 storey facility; however this is misleading, as given its proposed height of 23.5 metres, it would actually be within the upper range of a 6 storey apartment building (typically between 18 – 23 metres).

The DA also refers to future scalability requirements with no detail about what this means, hinting at future expansion before the current DA can even be properly assessed.



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An initial review of Perth-based data centres indicates that all existing facilities (Perth, Malaga, Shenton Park, Canning Vale, Belmont, Wangara, Morley, Bibra Lake, Maddington, Osborne Park) are located on sewered land.

It appears that Hazelmere would be the first data centre proposed in Perth without government sewerage or a viable on-site wastewater disposal alternative, and within 40 m of a river and Conservation Category Wetland, a dangerous precedent to set.

Summary

The Hazelmere Data Centre proposal is fundamentally inconsistent with:

- Local Planning Scheme 17
- Hazelmere Enterprise Area (HEA) Structure Plan
- Development Control Policy 4.1
- State Planning Policy 2.9
- Better Urban Water Management guidelines
- Principles of orderly and proper planning under the *Planning and Development Act 2005*
- State water-resource sustainability objectives
- Environmental and public-health protection requirements

The DA is incomplete and lacks essential engineering, hydrological, wastewater, geotechnical, and environmental information. The omission of basic site investigations, combined with errors such as repeated references to the “Henley River”, underscores the lack of due diligence.

Furthermore, the lengthy but incomplete DA:

- Denies the community an informed consultation process.
- Places burden on community members to review and respond in detail to a proposal that is incapable of proper technical assessment.
- Exposes the City of Swan, our community and the surrounding environment to unacceptable long-term risks.

BNAA respectfully requests that the City of Swan determine that the proposal is incapable of approval in its current form, and require the proponent to submit a full, independently verified suite of environmental, engineering, and servicing assessments before any further deliberation is given.

Thank you for your consideration. Please feel free to contact me on manager@bibbul.org to discuss.

Yours,

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Executive Director and Principal Environmental Scientist

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