

Our ref: OUT24/215

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NSW Department of Planning, Housing and Infrastructure
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12 January 2024

Subject: Honeman Close Data Centre (SSD-58601963) – Environmental Impact Statement

Dear Bruce,

I refer to your request for advice sent on 12 December 2023 to the Department of Planning and Environment (DPE) Water, now the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group, about the above matter.

Lehr Consultants International (Australia) Pty Ltd seeks to develop a new 96 MW data centre facility referred to by the operator as SYD01. The proposed data centre would be 5 storeys in height with a maximum overall height of 43.25 m and a total GFA of approximately 39,267 sqm. In addition to the data centre itself, the SSDA seeks approval for associated water and power infrastructure, mechanical plant and equipment, internal roads and car parking, and site landscaping.

The DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water licensing and aquifer interference activities. Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW Water Assessments water.assessments@dpie.nsw.gov.au.

Yours sincerely



Rob Brownbill,
Manager, Water Assessments, Knowledge Division
Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Honeman Close Data Centre (SSD-58601963) - EIS

1.0 Water take and licensing

1.1 Recommendation – pre-determination

The proponent quantifies the maximum annual volume of water take due to aquifer interference activities during both the construction and ongoing operation phases of the project. The proponent must also demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes and licensing requirements. DCCEE Water notes that the groundwater table will likely be intercepted. Maximum excavation depths for this project will be at 5 metres below ground level (bgl). Groundwater seepage was encountered in several boreholes at depths 1.33 – 4.52 metres bgl. Due to these estimates, groundwater seepage into the excavation is expected. The submission also indicates potential minor inflows during construction phase which are not quantified and makes note that drainage will be required due to potential future inflows. There is a requirement to confirm and quantify these volumes and to identify how these will be licensed. Quantification of maximum potential inflow volumes during construction and operation is required.

1.2 Recommendation – post approval

The proponent should ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018.

Explanation

Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018 applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as:

- the water is not taken for consumption or supply;
- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and

- the records are kept for 5 years.

Further information on these requirements and other information on licensing and approvals, exemptions, including an exemption application form and a form to report and record water taken can be found at:

<https://water.dpie.nsw.gov.au/licensing-and-trade>

2.0 Groundwater impacts and dewatering requirements

2.1 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:

- https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf
- https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf

Explanation

As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. Although a comprehensive groundwater study prior to determination is unnecessary given the perceived low level of risk, the DCCEEW-Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.

End Attachment A