



08<sup>th</sup> Oct 2025

GEOSCAPES Reference: # 231107\_SSD\_LET\_RTC01

To: **Department of Planning Industry and Environment**

Re: **Glendenning Road Data Centre, 2 Glendenning Rd, Glendenning NSW 2761 (SSDA 73761707) - Response to Submissions – Landscaping and Visual Impact.**

Dear Sir/Madam,

Please find below our responses to recent comments raised by the DPHI regarding the Landscape Plans and VIA prepared by Geoscapes for the above-named project.

Agency – *Blacktown City Council*

### *1. Planning Issues*

*d. Provide additional landscaping and tree planting in the front landscaped setback area adjacent Glendenning Road. Underground fuel tanks are also proposed in the landscape setback which compromises the opportunity for dense landscaping in the front setback. These tanks should be relocated accordingly.*

**Geoscapes Response** – Refer to Proposed Tree Locations & Services Plan Overlay on L-0003. Landscaping in this area is constrained by underground services and the placement of underground fuel tanks. Refer to Detail Plan on L-0100 and Section A-A on L-0200. To address this, the following changes have been made:

- One *Elaeocarpus reticulatus prima donna* tree has been replaced with a larger species; *Cupaniopsis anacardioides*.
- 1-3 m tall shrubs have been introduced to create denser landscaping in the front setback.

*e. Additional dense landscaping is to be provided in front of any retaining walls that will be visible from Glendenning Road.*

**Geoscapes Response** – Planting to these areas is restricted by light poles, easements, and the required 3 m clearance from the security fence. Refer to Detail Plan on L-0101, 1.2 m tall shrubs have been provided in front of exposed retaining walls. Planting has not been installed where walls are already screened by existing trees or where planting would encroach into the transmission tower easements.

*f. Amend the landscape plans to provide 1 tree every 10m in the car park as required under the Blacktown Development Control Plan. Several landscaping strips in the car park do not include any tree planting.*

**Geoscapes Response** – Due to extensive underground services, light poles, and limited space within the car park islands, it is not feasible to provide one tree every 10 m as required under the Blacktown DCP. However, (refer to Detail Plan on L-0101), eight additional trees have been incorporated into the landscape islands where feasible, particularly between Buildings DC02 and DC03.

*g. It appears that the existing maintenance track to Nurragingy Reserve will be impacted by the landscaping in the south eastern corner of the site. Please clarify the plans in this regard.*

**Geoscapes Response** – Refer to Detail Plan on L-0102, the proposed landscaping, including nine trees, has been removed from the existing maintenance track to Nurragingy Reserve. To offset this change, ten additional trees have been provided, bringing the total planted to 318 trees.





## 2. City Architect

b. Building heights have not been reduced. We would like to see some judicious use of colour in the facades, for example the flues, louvres or dri-design panels. As currently presented, the proposal is monotone. Precedent examples in the design report (section 05 page 25) of bronze or green hues are promising. It is noted that any architectural treatments to facades will not alleviate the visual impact of the development.

**Geoscapes Response** – The Visual Impact Assessment has been updated to reflect the colour revisions and façade modifications proposed by GBA.

Agency – DPHI

### Urban Design and Visual Impact

21. The Department has concerns regarding the visual impacts of the development on local amenity due to its overall bulk and scale. While the site is located within an industrial area, the proposed development is not considered consistent with the existing industrial context, as it would significantly exceed the prevailing built form and industrial skyline. Accordingly, the Department considers that further refinement of the building façade is necessary to reduce visual impacts and better integrate the development within its surrounding context.

22. Further to the above, the Department does not agree with the assertions made in the Architectural Design Report (Appendix 05) that the proposed colour palette and materials 'harmonise with the surrounding environment'. In particular, the Department does not support the extensive use of black panelling on the facades, which is considered visually intrusive. The Department supports the recommendations made by Blacktown City Council to enhance the façade treatment, including further consideration of the bronze hues referenced in the Architectural Design Report, to achieve a more contextually appropriate and visually balanced outcome.

**Geoscapes Response** – The Visual Impact Assessment report has been revised to incorporate the updated colour palette and façade modifications proposed by GBA.

### Landscaping Underground fuel tank locations

23. The Department shares Council's concerns regarding the placement of underground fuel storage tanks within landscaped areas, as this may limit the site's capacity to accommodate additional deep soil tree planting. The Department requests that the proposed location of the underground fuel tanks be reconsidered to optimise opportunities for deep soil planting and to ensure the provision of appropriate landscaped setbacks and buffers across the site.

**Geoscapes Response** – Refer to Proposed Tree Locations & Services Plan Overlay on L-0003. Landscaping in this area is constrained by underground services and the placement of underground fuel tanks. Refer to Detail Plan on L-0100 and Section A-A on L-0200. To address this, the following changes have been made:

- One *Elaeocarpus reticulatus prima donna* tree has been replaced with a larger species; *Cupaniopsis anacardioides*.
- 1-3 m tall shrubs have been introduced to create denser landscaping in the front setback.





Agency – DPHI

Asset Protection Zones: Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

1. From the commencement of building works and in perpetuity, the entire property (except for the 'Biodiversity Zone' and 'Terrestrial Biodiversity' areas as shown on the site plan) must be managed to the standards of an inner protection area (IPA) as outlined in Appendix 4 of Planning for Bush Fire Protection 2019:

- Tree canopy cover should be less than 15% at maturity

**Geoscapes Response** – Refer to Canopy Cover Plan on L-0002, total tree canopy cover across the site is 10%, within APZ identified zones this reduces to 1.78%

- Trees at maturity should not touch or overhang the building

**Geoscapes Response** – Refer to Canopy Cover Plan on L-0002, a 2 m offset from mature tree canopies has been applied for all trees located near buildings.

- Lower limbs should be removed up to a height of 2 m above the ground

**Geoscapes Response** – This will only be achievable once the trees reach full maturity. During the first 5–10 years after installation, the lower limbs will need to be progressively removed by the landscape contractor team.

- Tree canopies should be separated by 2 to 5 m

**Geoscapes Response** – Landscape plans have been reviewed and endorsed by the project Bushfire Consultant. Refer to Canopy Cover Plan on L-0002, a 2 m offset from the mature tree canopy has been applied for all trees. While some trees are planted in groups, the 2 m offset still applies to the canopy of the trees located at the outer edge of each group.

- Preference should be given to smooth-barked and evergreen trees

**Geoscapes Response** – All tree species used are evergreen; however, due to the use of native and indigenous species there is a mixture of smooth and rough barked species.

- Large discontinuities or gaps in the shrubs layer should be provided to slow down or break the progress of fire towards buildings

**Geoscapes Response** – Refer to Detail Plan on L-0100 to L-0103, large discontinuities or gaps in the shrubs layer were provided.

- Shrubs should not be located under trees

**Geoscapes Response** – Refer to Canopy Cover Plan on L-0002 and Detail Plan on L-0100 to L-0103; no shrubs have been provided under trees within the APZ. Landscaping adjacent to service areas, previously proposed as shrubs, has been revised to groundcover. Shrubs are present under trees within M1 (frontage) and M3A (revegetation area); however, these locations are outside the APZ, so the restriction does not apply.

- Shrubs should not form more than 10% ground cover

**Geoscapes Response** – Shrubs make up 2% of the ground cover within the APZ.





- *Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation*

**Geoscapes Response** – No landscaping was provided within 1.25 m of the building. The shrubs in APZ zone are 0.4 m tall; therefore, a minimum clearance of 0.8 m is achieved.

- *Grass should be kept mown (as a guide, grass should be kept to no more than 100mm in height)*

**Geoscapes Response** – There is no lawn proposed in the project.

- *Leaves and vegetation debris should be removed regularly*

**Geoscapes Response** – Leaves and vegetation will be regularly removed by the Landscape Contractor as part of regular maintenance.

2. Landscaping within the inner protection area (IPA) must comply with Appendix 4 of Planning for Bush Fire Protection 2019. In this regard, the following principles are to be incorporated:

- *A minimum 1 metre wide area (or to the property boundary where the setbacks are less than 1 metre), suitable for pedestrian traffic, must be provided around the immediate curtilage of the building*

**Geoscapes Response** – Refer to Architectural response.

- *Planting is limited in the immediate vicinity of the building*

**Geoscapes Response** – Refer to Canopy Cover Plan on L-0002, a 2 m offset from the mature tree canopy has been applied for all trees located near the building.

- *Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters)*

**Geoscapes Response** – Landscape plans have been reviewed and endorsed by the project Bushfire Consultant. A 2 m canopy offset is maintained for all trees near buildings, including those at the edges of grouped plantings (Refer to Canopy Cover Plan on L-0002).

- *Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA) at maturity and trees do not touch or overhang buildings*

**Geoscapes Response** – Refer to Canopy Cover Plan on L-0002, total tree canopy cover is 10% (within APZ zones this reduces to 1.5%). A 2 m offset from the mature tree canopy has been applied for all trees located near the building.

- *Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies*

**Geoscapes Response** – All trees within the IPA zone have non-rough, non-fibrous bark, except for two *Syncarpia glomulifera*. However, these *Syncarpia glomulifera* are proposed with a canopy offset of more than 5 m and are isolated from other.

- *Use smooth bark species of trees species which generally do not spread fire up the bark into the crown*

**Geoscapes Response** – All tree species used are evergreen; however, due to the use of native and indigenous species there is a mixture of smooth and rough barked species.

- *Avoid planting of deciduous species that may increase fuel at surface/ground level (i.e. leaf litter)*

**Geoscapes Response** – All tree species used are evergreen.





- Avoid climbing species to walls and pergolas

**Geoscapes Response** – No climbing species are proposed.

- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building

**Geoscapes Response** – Combustible materials will be kept clear of buildings.

- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building

**Geoscapes Response** – Refer to Detail Plan on L-0103, pergolas and outdoor furniture were proposed 16 m away from building

- Low flammability vegetation species are used

**Geoscapes Response** – Non-low flammability species have been used only in small, isolated groups. Landscape plans have been reviewed and endorsed by the project's Bushfire Consultant.

Agency – CPHR

#### 9. Landscape Plan – use of short-lived and weed species

The Landscape Plan proposes to use *Acacia decurrens* and *Acacia parramattensis*. These species are relatively short-lived species. The use of *Acacia saligna* is also proposed, which is an environmental weed in NSW.

*Recommended action:* Replace these three species with long-lived trees descriptive of PCT 3320 - Cumberland Shale Plains Woodland [refer to <https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2008-2010/cumberland-plain-woodland-critically-endangered-ecological-community-listing>].

**Geoscapes Response** – Geoscapes has replaced the following species as recommended:

- *Acacia decurrens*
- *Acacia parramattensis*
- *Acacia saligna*

These have been substituted with 8 "**Exocarpos cupressiformis**" in the Planting Schedule on L-0302, a long-lived species characteristic of PCT 3320 – Cumberland Shale Plains Woodland, and with 9 "**Acacia implexa**" and 14 "**Exocarpos cupressiformis**" in the Cumberland Plain Revegetation Planting Schedule on L-0301. Refer to Detail Plan on L-0100 to L-0103.

Yours faithfully

A handwritten signature in black ink, appearing to read 'B. Gluszkowski'.

**Ben Gluszkowski** Grad Dip LA, Registered Landscape Architect #5868

**Director**

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