

Department of Planning and Environment

Our ref: DOC22/612181

Your Ref: SSD-33781208

Patrick Copas
Senior Environmental Assessment Officer
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

9 August 2022

Subject: Request for Advice - Station Road Data Centre Expansion, 57 Station Street Road, Seven Hills (SSD-33781208)

Dear Mr Copas

Thank you for your email received 8 July 2022 seeking comments on the environmental impact statement (EIS) for the above project. Environment and Heritage Group (EHG) has reviewed the EIS for this project and provides the following comments.

EHG notes that the site is subject to an existing development consent (DA-21-01058) for the redevelopment of a smaller data centre, with associated civil works, landscaping, parking, and traffic circulation areas. The consent also provides for cut and fill and retaining works.

Request to waive the requirement to prepare a biodiversity development assessment report

A request to waive the need for BDAR was submitted with the EIS. EHG has reviewed the information contained in the Biodiversity Development Assessment Report (Waiver) for 57 Station Road, Seven Hills by Biosis dated 16th May 2022, and considers that additional information is required.

EHG notes that aerial photography of the site shows several mature trees along the north eastern boundary of the property. Tree protection zones are likely to extend into the property given the size and maturity of the trees. While the EIS (Figure 11) shows only minimal cut and fill to occur along the north eastern boundary under the DA-21-01058 consent, the EIS identifies that the proposed level of cut and fill on the site will vary from the works approved under the previous consent.

It remains unclear from the EIS the extent, if any, of additional cut/fill is proposed in this area, and what impact this may have on trees that have not been approved for removal under the previous consent or considered as part of the current application. The applicant is required to clarify the differences between the consent for DA-21-01058 to the current proposal in this area along the north eastern boundary. Specifically, in relation to civil works including cut/fill, stormwater works and fencing, all of which can have an impact to neighbouring trees.

Once additional work proposed by the application are clearly identified, an assessment of impacts to the trees may be required. An Arboricultural Impact Assessment (AIA) undertaken by a suitably qualified Arborist (Diploma qualified arborist) should be provided which identifies trees on the boundary or within the neighbouring property and assess impacts to those trees from the proposal in accordance with AS4970:2009 - *Protection of trees on development sites*. Importantly the AIA should demonstrate whether the proposal will have a major encroachment into the tree protection zone of these trees.

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Once the requested information has been provided, EHG will finalise its consideration of the request to waive the requirement to prepare a BDAR.

Flooding

EHG notes that under the approved DA-21-01058 the whole site will be above the probable maximum flood level (PMF level) identified by the *Local Overland Flow Path Study within Existing Urban Areas of Blacktown City*, which is currently being finalised by Council.

EHG considers that the flood assessment for this development application should include the fully developed site including the previous approved development. The flood assessment should include flood behaviour maps within the study area including flood depth, extent and hazard for both existing and developed scenarios.

The flood assessment should provide impact mapping to show changes in flood depth and extent within the study area, to allow the review of the adequacy of the assessment.

EHG recommends that the applicant consults with Blacktown City Council to ensure the models used in the flood assessment is compatible with Council's study, such as the *Local Overland Flow Path Study within Existing Urban Areas of Blacktown City* for the existing scenario.

If you have any queries please contact David Way, Senior Conservation Officer via David.Way@planning.nsw.gov.au or 02 8275 1324.

Yours sincerely,

A handwritten signature in black ink that reads "S. Harrison".

Susan Harrison

Senior Teams Leader

Greater Sydney Branch

Biodiversity and Conservation