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Senders ref: SSD 10469 (Blacktown)

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Industry Assessments
Planning and Assessment Group
NSW Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Williams,

Subject: Notice of Exhibition – Augusta Street, Data Centre, Blacktown (SSD 10469)

Thank you for your e-mail dated 24 September 2020, inviting Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) to comment on the Notice of Exhibition for Augusta Street, Data Centre Blacktown.

EES has reviewed the relevant documentation and make the following comments.

Biodiversity

A revised Biodiversity Development Assessment Report (BDAR) with the appropriate spatial data should be submitted to EES for review prior to any approvals being granted.

Flooding

The purpose of a Flood Impact and Risk Assessment is to determine the flood risk at the site and outline how this risk is to be managed under the post development condition. This would include the following floodplain risk management considerations to assist and guide decision-making at this planning stage:

- identifying existing flood behaviour (pre-development condition) for the full range of floods up to and including the probable maximum flood
- identifying developed flood behaviour (post development condition) for the full range of floods and outline the impacts of the development on flooding behaviour within and outside the site, then identify management measures to offset these impacts
- identifying the impacts of flooding on the proposed development and assess the compatibility of the proposed development with flood risk regarding risk to life and damages to properties.

The Flood Impact Assessment prepared by KBR, dated August 2020 has not adequately addressed the above requirements to guide decision-making at this EIS stage. The following dot points outline issues that need to be addressed:

- For existing condition, the assessment of existing flood behaviour has been undertaken under 5% AEP and 1% AEP events without considering full range of flooding.
- For developed condition, the report has outlined flood behaviour under the 5% AEP and 1% AEP events. The flood behaviour under the PMF Event has been outlined in the Flood evacuation report.

- The report outlined the impacts of the development for the 5% AEP and 1% AEP events only. Figures 3-6 to 3-8 show that, under the proposed developed scenario, the 1% AEP peak flood level, flood extent and peak velocity would increase outside the boundary of the site to the west due to raising of Augusta Road. In this regard, Section 3.2.1 states 'Under the proposed flooding conditions the peak water level in the pooling location is 70.93m AHD, the boundary of the adjacent property grades from 71.45m AHD upwards towards the south, leaving sufficient freeboard within the topography from the increase in flood levels'. Although, 0.5 m freeboard has been considered in the developed 1% AEP event, it would be prudent to assess an event just larger than the 1% AEP, i.e. the 0.5% AEP. In addition, consultation with Blacktown City Council and property owners adjacent to the waterway corridor west of the site is recommended regarding these impacts.
- There is no assessment of the development impacts for events larger than the 1% AEP. It should be noted that, although it is merely required to identify management measures to offset the development impacts up to the design flood (i.e. the 1% AEP flood), the impacts of the development for the full range of flooding should be considered and documented in the report in order to develop an understanding of the flooding risks during major and rare events and to implement suitable risk management measures to protect assets, personnel and visitors of the Data Centre.
- The report does not identify the impacts of flooding on the proposed development or assess the compatibility of the proposed development with flood risk.

It is recommended that the above dot points are addressed and incorporated into the Flood Impact Assessment. Furthermore, Table 9 of the EIS, which outlines the flood requirements under clause 33I Development on flood prone land, State Environmental Planning Policy (Western Sydney Employment Area), should be reviewed in accordance with the outcomes of the amended flood impact assessment.

Regarding the Flood Evacuation Report, EES recommends that an emergency response plan is prepared, including safety signs, near the access to the site. The preparation and implementation of an emergency response plan will help ensure the safety of personnel and visitors of the centre.

Please note from 1 July 2020 Aboriginal cultural heritage regulation, including advice regarding SSIs and SSDs, is now managed Heritage NSW. The new contact is heritagemailbox@environment.nsw.gov.au.

Should you have any queries regarding this matter, please contact Bronwyn Smith Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au.

Yours sincerely



12/10/20

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