



NARLA
environmental

Narla Environmental Pty Ltd

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31st January 2024

Re: Request for a Biodiversity Development Assessment Report (BDAR) Waiver for the proposed NEXTDC S4 Data Centre.

To whom it may concern,

Narla Environmental Pty Ltd (Narla) was engaged by the NEXTDC (the proponent), to prepare a Biodiversity Development Assessment Report (BDAR) Waiver for the proposed development of Data Centre. This BDAR Waiver will be submitted to support the preparation of an Environmental Impact Statement (EIS) and State Significant Development Application (SSD-63741210) to the Department of Planning, Housing and Infrastructure (DPHI).

The proposed development is located on the corner of 16 Johnston Crescent, Horsley Park (Lot 305/DP1270511; hereafter the 'Subject Property') and includes a large biodiversity exclusion zone (**Appendix A**). All areas associated with the proposed development are hereafter referred to as the Subject Land (**Figure 1**).

The SSDA is for the development of the Data Centre and all associated works. All previous demolition and vegetation removal works including civil/earth works were completed as part of the remediation of the site under a previous approved DA893.1/2013. Therefore, no vegetation removal and building demolition associated with subject property form part of this SSDA.

This BDAR Waiver has been prepared to accompany the SSD Application to demonstrate that the proposed development is not likely to have any significant impacts on biodiversity values in accordance with Section 7.9(2) of the NSW Biodiversity Conservation Act 2016 (BC Act), which stipulates:

- *“Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.*

Site Details and Proposed Development

The proposed development area has an area of approximately 8.2ha and is bound by the Burley Road to North, two large lot residential properties and Biodiversity exclusion area to the East, industrial estate to the South, and Johnston Crescent to the West.

The proposed Data Centre will span across the Subject Site, and include:

- data storage facilities and offices;
- internal roads, onsite carpark and footpaths;
- landscaping; and
- Asset Protection Zone (APZ); and
- Perimeter security fencing.

The Subject Land consists entirely of a remediated pad, and one detention basin. The only vegetation within the Subject Land occurs on the north and east boundary and consisted of planted native vegetation, typical of an

urban environment, however a majority of this vegetation consists of locally occurring ground species. Remnant Native Vegetation in the form of a Cumberland Shale Plains Woodland does occur in the Subject Property, as described in **Table 1**. Proposed landscaping associated with the SSDA will create protective vegetation buffer between the proposed development and the biodiversity exclusion zone to be protected. This 25m buffer is required to be maintained as an Asset Protection Zone. (**Figure 2**).

Impacts on biodiversity values

The relevance and potential impacts to biodiversity values, as defined in the BC Act and the *Biodiversity Conservation Regulation 2017* (BC Regulation) is discussed in **Table 2**. Where a biodiversity value is relevant, an explanation of how impacts have been avoided and the likelihood and extent of any remaining impacts of the proposed development (including impacts prescribed under regulation 6.1 of the BC Regulation) have been assessed. A description of the vegetation is outlined in **Table 1** and general photos of the vegetation within the Subject Land are presented in **Appendix B**.

No man-made structures within the Subject Land will require demolition to facilitate the proposed works, as previously discussed, the demolition works have already been approved under DA893.1/2013. Therefore, impacts to threatened species that may utilise buildings, such as microchiropteran bat species, are not required to be assessed as part of this SSDA.

Conclusion

Due to the no impact on any native vegetation, it is not expected that the proposed development will impact upon biodiversity values. Therefore, this letter should be submitted in support of the application for a BDAR Waiver.

Yours sincerely,

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Figure 1. Components of the Subject Land within the Subject Property.

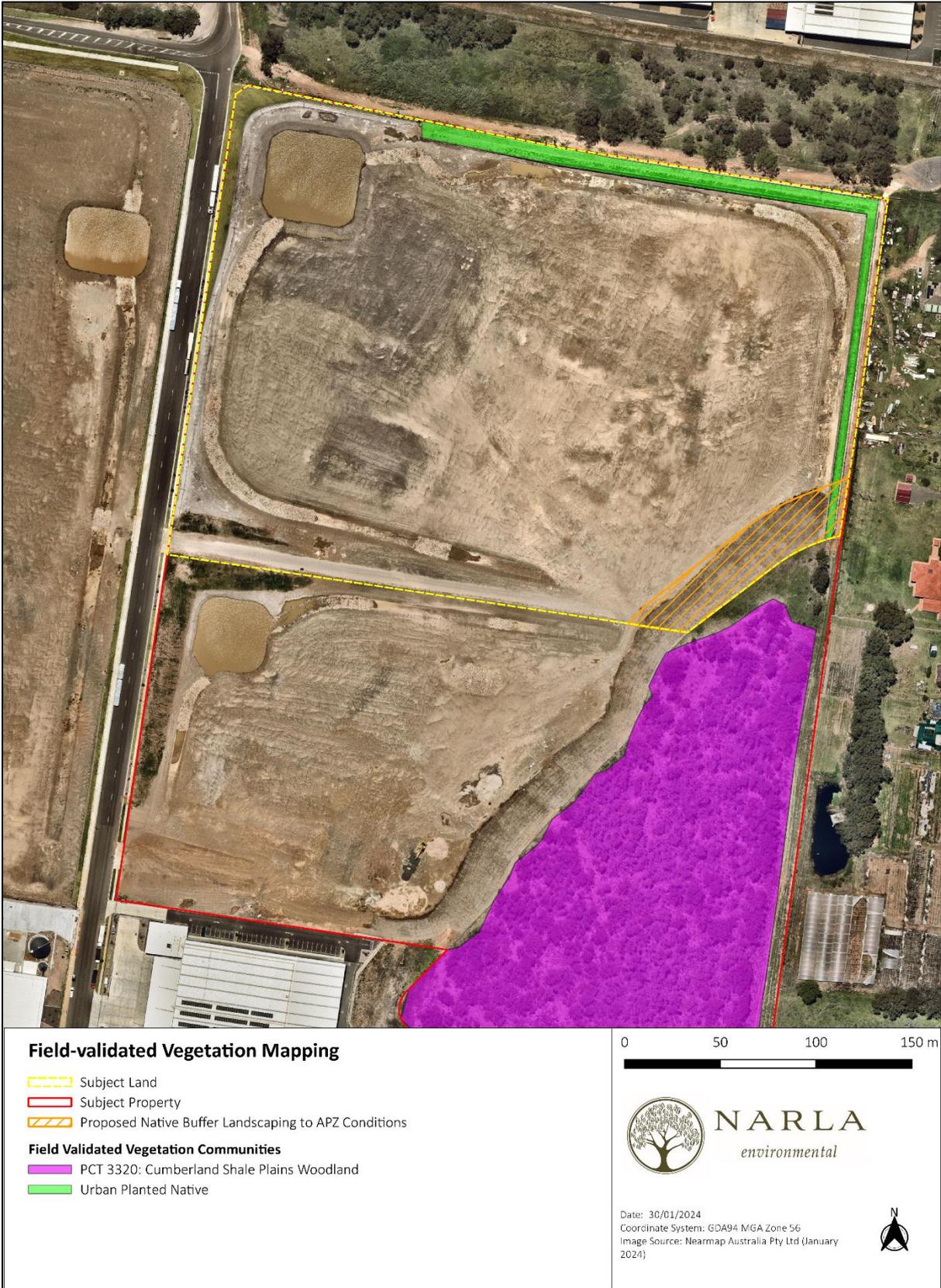


Figure 2. Field-validated Vegetation Communities identified adjacent to the Subject Land.

Table 1. Urban Planted Native within the Subject Land.

Urban planted native	
	
Extent to be impacted.	0.25ha
Description of the Vegetation within the Subject Land	
<p>This vegetation community consisted of low-density native groundcovers, which have been planted as gardens in association within the existing retaining wall. At the time of the site assessment no canopy or midstory species have been planted. The groundlayer only including <i>Dianella longifolia</i>. and <i>Lomandra longifolia</i>.</p>	
Justification of Vegetation Assignment	<p>This assemblage of species within the landscape of the Subject Land does not conform to any locally occurring Plant Community Type (PCT) and has therefore been classified as Urban planted natives.</p>
TEC Status	Not Listed.

Table 2. Impacts of the proposed development on biodiversity values.

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
Vegetation abundance – <i>BC Regulation Section 1.4(b)</i>	Occurrence and abundance of vegetation at a particular site	No	No vegetation is proposed to be removed or impacted as part of the SSDA (Table 1). The only vegetation within the Subject Site comes in the form of recently planted gardens beds using a low mix of commonly planted native ground species and does not conform to a native PCT. Should any of this vegetation be required to be removed as part of the Perimeter Security fence It is unlikely that the removal of such vegetation would significantly impact on any biodiversity values.
Vegetation integrity – <i>BC Act Section 1.5(2)(a)</i>	Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near-natural state	No	The vegetation within the Subject Land and surrounding landscape does not conform to a native PCT as it has been heavily altered from a natural state to best reflect Urban Exotic/Native Vegetation. Therefore, the vegetation does not have an integrity score.
Habitat suitability – <i>BC Act Section 1.5(2)(b)</i>	Degree to which the habitat needs of threatened species are present at a particular site	No	The majority of potential threatened species habitat within the Subject Property (i.e Biodiversity Exclusion Zone) are proposed to be retained and protected. Therefore, there is no significant impact expected on threatened species from the proposed development.

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
Threatened species abundance – <i>BC Regulation Section 1.4(a)</i>	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	Yes	<p>A threatened flora and habitat survey was undertaken in accordance with <i>Surveying threatened plants and their habitats</i> (DPIE 2020) in the vegetation adjacent to the Subject Land within Lot 305/DP1275011 and no threatened species were identified. As previously discussed, remnant vegetation within the Subject Property occurs within the adjacent biodiverse exclusion zone and conforms to the BC Act listed EEC Cumberland Plain Woodland in the Sydney Basin Bioregion and EPBC Act listed Cumberland Plain Shale Woodlands and Shale Gravel Transition Forest. Several threatened species have been recorded within this zone including <i>Meridolum corneovirens</i> (Cumberland Plain Land Snail). This community is proposed to be retained and is currently behind a permanent exclusion fence. The proposal further seeks to protect this area by creating a 25m vegetation buffer.</p> <p>Therefore, there is no significant impact expected on threatened species from the proposed development.</p>
Habitat connectivity – <i>BC Regulation Section 1.4(c)</i>	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	Yes	The Subject Land is located within a highly developed and altered landscape, that would likely only provide habitat for highly mobile species such as avian species or Grey-headed Flying Fox. The vegetation being retained in the greater Subject Property and locality, along with the species proposed to be planted within the associated landscape plan, will continue to provide the same quality of connectivity to these species that is currently present.
Threatened species movement – <i>BC Regulation Section 1.4(d)</i>	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	No	It is not expected that the Subject Land contributes to the movement of threatened species to maintain their lifecycle (e.g migratory species or movement to breeding habitat). The vegetation within the Subject Properties Biodiversity exclusion zone may potentially be used by threatened species for intermittent foraging, however as previously discussed, habitat connectivity is only available for highly mobile species and is expected to be retained in the greater Subject Property and locality.

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
Flight path integrity – <i>BC Regulation Section 1.4(e)</i>	Degree to which the flight paths of protected animals over a particular site are free from interference	No	It is unlikely that the Subject Land is part of a flight path used by threatened or migratory species. Furthermore, the proposed development will be consistent with the surrounding industrial landscape and building height. As habitat connectivity is expected to be retained within the broader locality, flight path integrity is not expected to be impacted by the development.
Water sustainability – <i>BC Regulation Section 1.4(f)</i>	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site	No	No watercourses or other water features are present within the Subject Land. The proposed development may cause an increase of stormwater velocity however, given the recently developed landscape this is unlikely to be significant.

Appendices

Appendix A. Proposed Site Plan (NEXTDC 2023).

Appendix B. General Site Photos

Appendix B. General Site Photos from S4 Subject Land



