



Shaun Williams
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 21 Darcy Street
Parramatta NSW 2150

26 August 2024

Subject: Environmental Impact Statement - NEXTDC S4 Data Centre Horsley Park (SSD-63741210)

Dear Shaun,

Thank you for your referral received 24 July 2024 requesting comments from the Biodiversity, Conservation and Science Group (BCS) on the Environmental Impact Statement (EIS) for the above proposal located at 16 Johnston Crescent, Horsley Park.

According to the EIS, the application seeks consent for:

- site preparation works including bulk earthworks and tree removal
- staged construction and operation of five data centre buildings – the height of Building A will be 32m and Buildings B, C, D and E will be 39m
- ancillary development including on-site parking for 200 cars, business identification signage, civil and stormwater works and 9,000m² of deep soil landscaping
- delivery of 232 megawatts of power, including a 330kV substation and a 33kV switching station.

BCS has reviewed the EIS and relevant supportive technical reports and identified biodiversity and flood risk management issues that need to be addressed which are detailed in Attachment A.

Should you have any queries regarding this matter, please contact Marnie Stewart, Senior Project Officer Planning on marnie.stewart@environment.nsw.gov.au.

Yours sincerely

Louisa Clark
Director
Greater Sydney Branch
Biodiversity, Conservation and Science

Attachment A – BCS comments on the Environmental Impact Statement - NEXTDC S4 Data Centre Horsley Park (SSD-63741210)

Biodiversity

BCS issued its Biodiversity Development Assessment Report (BDAR) waiver determination to the Department for this application on 21 February 2024 in which the proposal is described as:

‘Construction and operation of a data centre comprising of six data centre buildings with a maximum height of 38m and an operational capacity of 250 MW, including substation, earthworks, car parking, landscaping and ancillary works’ as detailed in the BDAR waiver application prepared by Narla Environmental Pty Ltd dated 31 January 2024.

BCS notes that there are discrepancies between the description of the proposal in the BDAR waiver determination and the EIS. Section 3.2.9 of the EIS states *‘A total of six trees located on the Council street verge adjoining the site will need to be removed to accommodate the development. The Proposal will offset the required tree removal through the planting of additional street trees.* The removal of these trees was not included in the BDAR waiver determination. There also appears to be inconsistencies relating to the height and number of buildings.

As stated in the BCS BDAR waiver determination, if the proposed development changes so that it is no longer consistent with this description, a further waiver request is required.

Flood risk management

BCS has reviewed the following documents:

- Industry Specific SEARs Data Storage Centres
- EIS – NEXTDC S4 Data Centre
- Appendix E - Architectural Plans
- Appendix Q - Flood Risk Assessment Report (TTW, 17 June 2024)
- Rural Area Flood Study Ropes, Reedy & Eastern Creeks Final Report (prepared by BMT for Fairfield City Council, November 2013).

BCS comments are as follows:

Flooding

The modelling results from completed flood studies show that the site is not flood affected and is located above the probable maximum flood (PMF) level.

However, the site is indirectly impacted by flooding as acknowledged in the Flood Risk Assessment Report which states *‘While the site itself is shown to be unaffected by flooding, access to Burley Rd is cut off, with flood depths exceeding 3m in some areas. This could potentially make evacuation from the site difficult or dangerous, especially considering flooding behaviour on Old Wallgrove Rd is unknown. It is likely a Flood Risk Management Plan would need to be developed, which would require more detailed modelling of the site and its surrounding area.’*

BCS supports the requirements for more detailed modelling of the site and surrounding areas in the earlier stage of the planning to ensure the safety of the users of the proposed data centre.

BCS recommends that the following is addressed in the detailed modelling:

- Access - The main and only access to the proposed SSD site (Data Centre) is Old Wallgrove Road, which intersects Lenore Drive around 1.8km north of the SSD site. Wallgrove Road crosses Reddy Creek at two locations, north and south of its intersection with Old Wallgrove Road. Lenore Drive crosses Rope Creek adjacent to Erskine Park. These creek crossings were not included in the flood models of the completed flood studies. The flooding conditions and traffic interruptions at these creek crossings need to be ascertained to evaluate the potential isolation of the proposed Data Centre during flooding events including the PMF event.

The unformed section Burley Road (around 300m) is located north of the SSD site, which intersects Old Wallgrove Road. This section of Burley Road is a dirt (and unpaved) road, not suitable to meet the access requirements to the SSD site. The existing Burley Road is expected to be upgraded as an east-west link road connecting Wallgrove Road in the east and Mamre

Road in the west. Burley Road crosses Reddy Creek around 0.9km east of the SSD site. The modelling results from the Reddy Creek Catchment show that this crossing is flood affected. The anticipated floodwater depth under the PMF event would be around 2-3m. This indicates that Burley Road in the future may also be flood affected unless the creek crossing is designed appropriately to avoid the flooding impacts. The SSD site may not be accessible from Burley Road during major flooding events in the future.

- Emergency - The SSD site is expected to be isolated for around 4-6 hours under major flooding events including the PMF subject to the assessment of flooding conditions at the unmodelled reaches of the Reddy Creek and Rope Creek Catchments. This may pose risks of potential isolation of workers and visitors at this SSD site, which will be operated 24/7. The anticipated level of isolation has been interpreted based on the critical duration of flooding for Reddy Creek and Rope Creek, which is around nine hours. It also may pose significant risk to life if unaware users of the site drive through flood water particularly at nighttime.

The development of an emergency response, plan consistent with the NSW State Emergency Service (SES) existing emergency management arrangement for the area as identified in the local flood plan, would be required to address emergency management constraints for the SSD site. The plan should be developed to address the key emergency management issue for this site which is the risk faced by itinerant users of the site.

Recommendation

The proponent should undertake the following:

- 1) assessment of flooding conditions at the unmodelled reaches of the Reddy and Rope Creek Catchments (especially the creek crossings at Wallgrove Road, Lenore Drive and Burley Road)
- 2) assessment of the level of isolation at the SSD site subject to the assessment of flooding conditions as per recommendation 1
- 3) development of a flood emergency response plan subject to flood impacts at access roads.

End of Submission