Department of Planning and Environment



Our ref: DOC22/903016 Your ref: DA 22/5820

Lewis Demertzi Planning Group Department of Planning and Environment 4 Parramatta Square, Parramatta NSW 2150

Subject: Additional information - Telecommunications Facilities at Penrith Lakes (DA 22/5820)

I refer to your email dated 24 May 2022 requesting comment from Environment and Heritage Group (EHG) on the additional information provided for the proposed Telecommunications Facilities at Penrith Lakes (DA 22/5820) - 153 Old Castlereagh Road, Castlereagh.

EHG has reviewed the additional information and provides the following comments.

Flooding

An updated Flood Impact Assessment (FIA) prepared by BMT, dated 2 September 2022 has been submitted. The FIA provides information on the impacts of the proposal on flood behaviour for the full range of flooding.

Regarding the impact of flooding on the proposed smart poles EHG notes the following:

- The FIA indicates that, the proposed smart poles are mainly designed to provide coverage during events in the Penrith Regatta Centre and they are not designed to provide services during a major flood event. However, BMT did not specify at which magnitude of flood event the smart poles would cease function.
- The Service Stream/ Optus response to the Request for Information (RFI) dated 15 September 2022 indicates that, the Smart Poles can function up to 570mm in water depth.

The information in the RFI response means that the smart poles would not function during any flood event larger than the 5% AEP flood. This specific information is not clear in the FIA and should be communicated to the Regatta Centre and to the State Emergency Service to ensure their understanding of the limitation of the service provided by the proposed smart poles.

Biodiversity

The RFI response states that an Environmental Management Plan (EMP) will be followed in areas where excavation is required. Measures contained within the EMP to mitigate impacts to trees have been outlined. In addition to the application of these measures, EHG recommends that where trenching or excavation occurs within the Tree Protection Zone (TPZ) of any tree, a Project Arborist (minimum Diploma in Arboriculture) must be on site to supervise works. Physical damage to tree trunks and branches must be avoided with suitable tree protection measure applied in accordance with Australian Standard 4970:2009 – Protection of Trees on Development Sites.

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Root disturbance and compaction of soil within the TPZ must also be avoided. Root pruning must only occur at the discretion of the project arborist with no severance of roots greater than 50mm diameter.

Should you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via <u>shaun.hunt@environment.nsw.gov.au</u> or 02 8275 1617.

Yours sincerely

S. Hannison

25/10/22

Susan Harrison Senior Team Leader Planning Greater Sydney Branch Biodiversity and Conservation