

Our Ref: AWE05.4ECO - HUNTINGWOOD

23 April 2026

To Whom it May Concern,

Re: Proposed Mod 1 / Rev 3 Plan for the AirTrunk Centre at 51 Huntingwood Drive, Huntingwood

Biodiversity Verification Statement

Travers bushfire & ecology (TBE) had previously been engaged to prepare a biodiversity development assessment report (BDAR) for the proposed State Significant Development (SSD) at 51 Huntingwood Drive, Huntingwood. The proposed development is for a seven-level data centre. The proposal also includes the construction of parking areas situated in the north-eastern and north-western aspects of the site. The SSD statutory obligation reference is SSD-41589232 and is located within the Blacktown City Council local government area.

The proposal will impact planted and remnant native vegetation, which includes impacts to the following vegetation communities (PCT below refers to Plant Community Type):

- PCT 3319 – Cumberland Shale Hills Woodland - 0.26 ha impacted
- Planted native vegetation - 2.29 ha impacted

As a result of the proposal, the following credits were determined that needed to be retired prior to construction.

Table 1 – Ecosystem credit summary

PCT	TEC	Area (ha)	Credits
3319 - Cumberland shale hills woodland	Cumberland Plain Woodland in the Sydney Basin Bioregion	0.26	7

Table 2 - Species credit summary

Species	Vegetation zones	Area (ha)	Credits
<i>Cercartetus nanus</i> / Eastern Pygmy-possum	3319_poor	0.26	6
<i>Hieraaetus morphnoides</i> / Little Eagle	3319_poor	0.26	4
<i>Marsdenia viridiflora</i> subsp. <i>viridiflora</i> - endangered population / <i>Marsdenia viridiflora</i> R. Br. subsp. <i>viridiflora</i> population in the Bankstown, Blacktown, Camden, Campbelltown, Fairfield, Holroyd, Liverpool and Penrith local government areas	3319_poor	0.26	6

We can confirm that all credits have been retired for the ecosystem and species credits.

The proposal is being lodged as an S4.55 Mod DA with a modified footprint as per Figure 1, being referred to as Mod 1/ Rev 3.

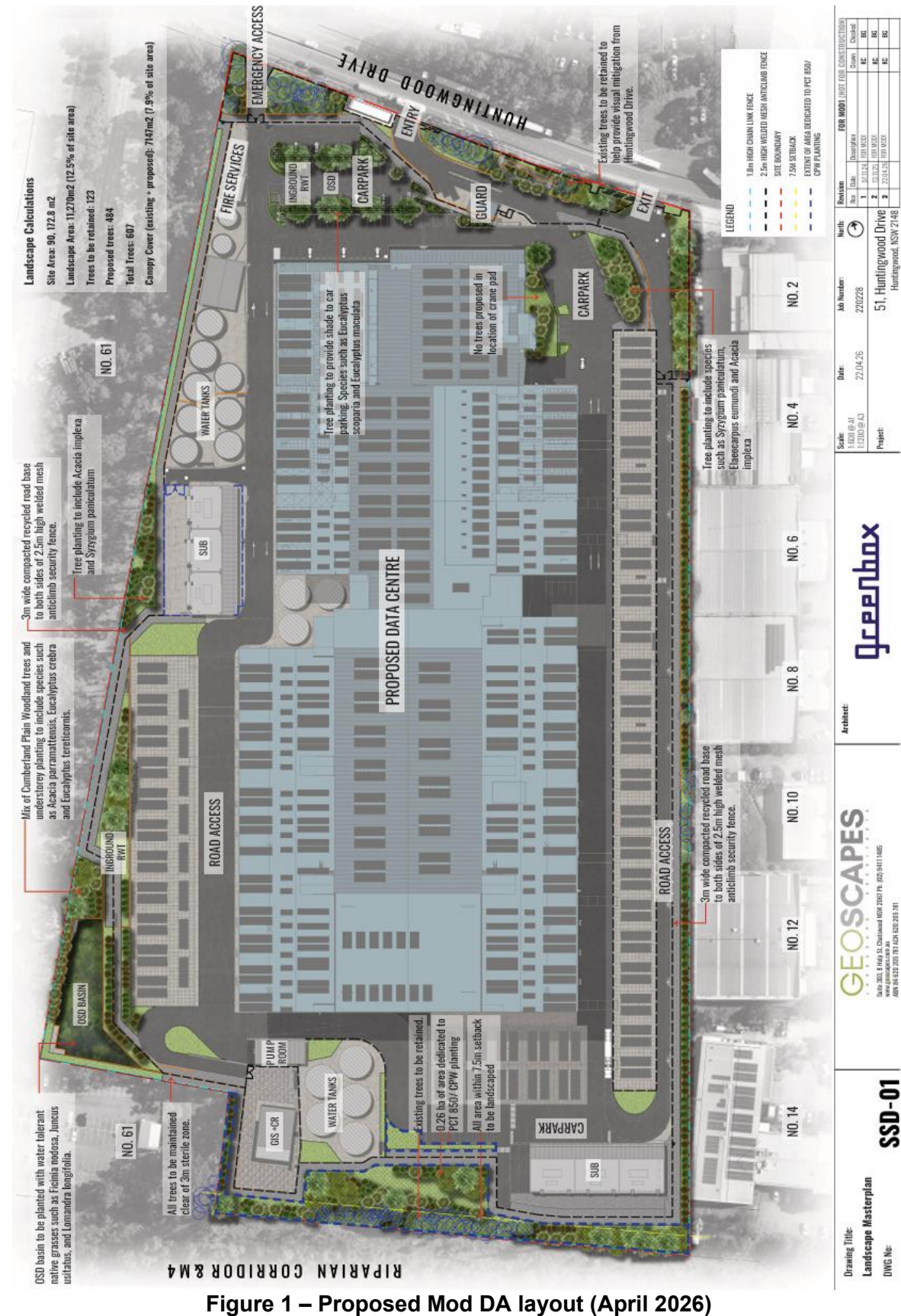


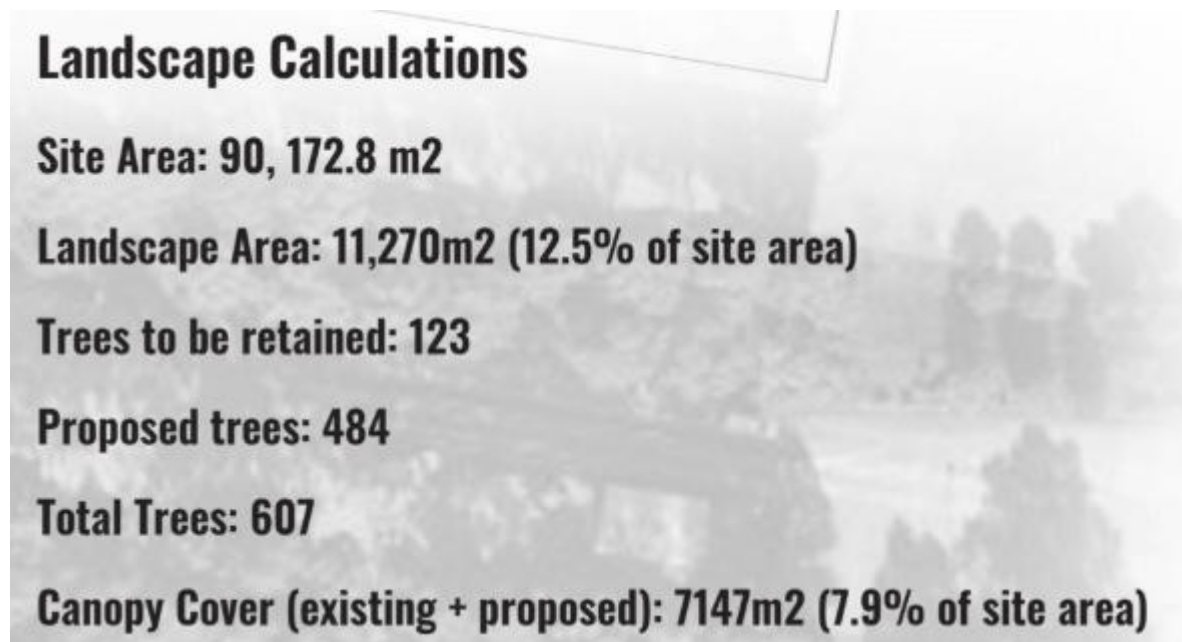
Figure 1 – Proposed Mod DA layout (April 2026)

The updated plan will require 7 not approved trees to be removed and 1 to be removed will now be retained, thus an overall requirement of 6 additional trees in total to be removed. To compensate for the loss of the trees, the landscape plan (Geoscapes) has ensured that additional trees will be planted within the site to compensate for their loss.

- 2274 / 2273 / 2276 – now removed – previously to be retained – 3 less
- 2268 – now removed – previously to be retained - 1 less
- 2272 – now removed – previously to be retained – 1 less
- 2191 and 2262 – now removed due to safety reasons – previously to be removed – no change
- 2261 and 2192 – now removed – previously to be retained – 2 less
- 2189 – retained – previously to be removed – add 1

Difference – 6 additional trees are proposed for removal, all required by Sydney Water for placement of their valve meter.

As a result, the total canopy cover (existing and proposed) has been modified to 7,147m² (7.9% of the site area). Please also note that the total landscape area has decreased slightly to 11,270m² (12.5% of the site area) from that of the BDAR.



Whilst the landscaping area has been slightly reduced from the original approved DA, the number of proposed plantings essentially remains unchanged, with marginally higher densities to ensure there's no nett loss of proposed revegetation and landscaping. The original BDAR advised 129 trees being retained and planting of 478 to have a total of 607 trees. The mod DA / Rev 3 will still have a total of 607 trees post planting, thus no nett loss.

Figures 1 and 2 show the location of said trees on the supplied plans from AirTrunk. The flow valve location has been carefully selected for minimal impact to the tree cover and landscaping, with the area of slab the valve arrangement sits on as per the sketches provided in the landscape plans. All piping is underground and is not affecting any trees or landscaping.

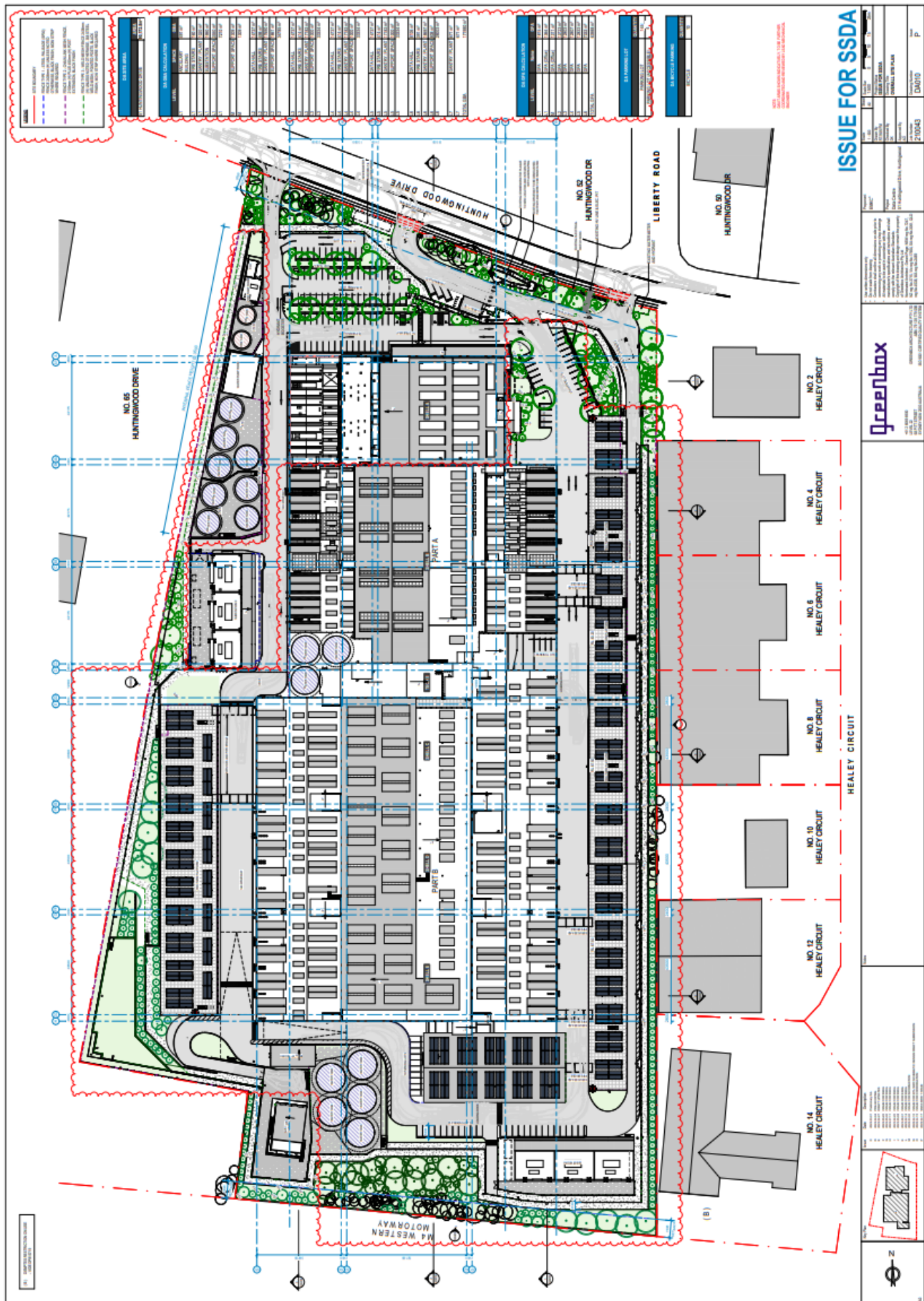


Figure 2 - Proposed Mod 1/Rev 3 DA design

Updated tree retention and removal plans are attached in Appendix 1.

Figure 3 is a snipped diagram from the approved BDAR. The blue colouring indicates planted vegetation whilst the orange colouring indicates remnant Cumberland Plain Woodland. Planted native vegetation has been assessed as a prescribed impact within the BDAR, with no credits required to be offset.

We can confirm that the location of the changes to tree retention and removal are upon planted specimens located near the site entrance within the blue colouring. As such these changes are not affecting any remnant areas of PCT 850 / 3319 (Cumberland Plain Woodland) that would affect biodiversity offsetting requirements. No further changes to the BDAR are required and no obligations for additional offsets will be sought by the modification.

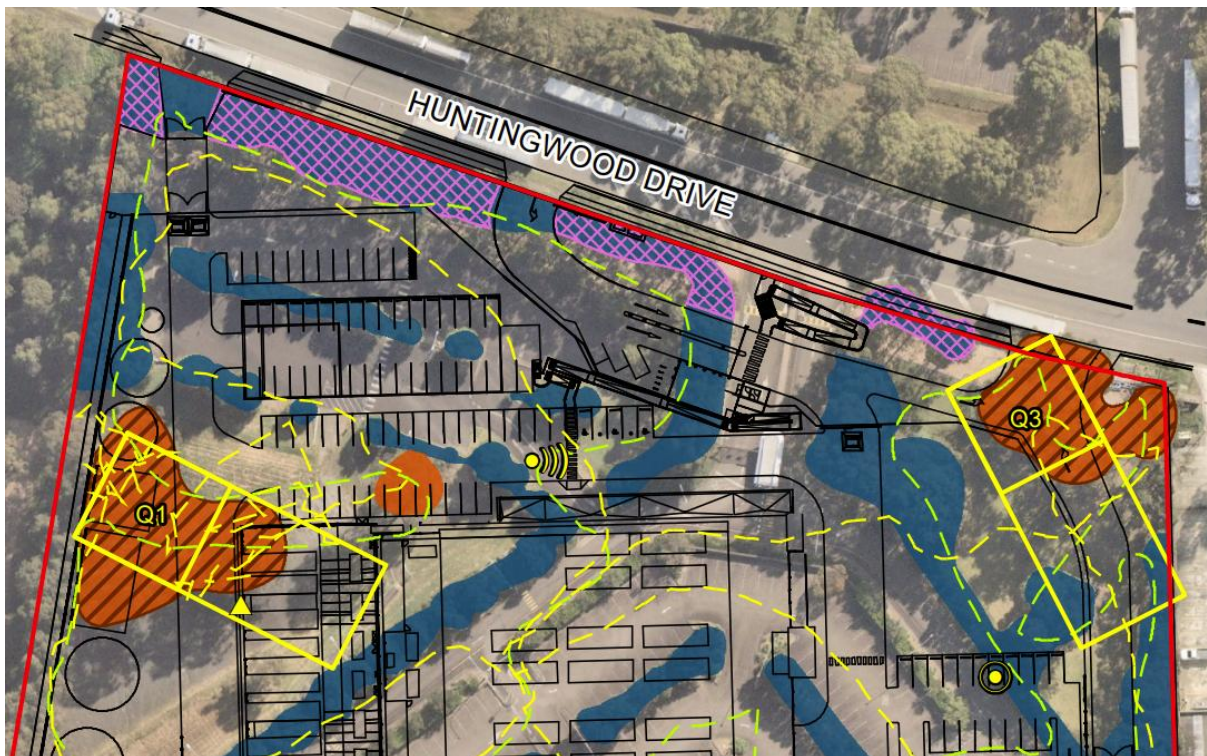


Figure 3 - Former vegetation mapping of the northern portion of the site

Addressing section 7.17 of the BC Act

The Conservation Programs, Heritage and Regulation (CPHR) Group has reviewed the Modification Report - 51 Huntingwood Drive Data Centre - S4.55(1A) (Willowtree Planning, 14 November 2025) and the supporting Biodiversity Verification Statement (Travers Bushfire and Ecology, updated 9 April 2026) and provides the following advice.

Section 7.17 of the Biodiversity Conservation Act 2016 (*BC Act*) requires a biodiversity development assessment report (BDAR) to be submitted with an application to modify a State significant development application, unless the authority or person determining the application for modification is satisfied that the modification will not increase the impact on biodiversity values. CPHR recommends the modification application is updated to address the requirements of Section 7.17 of the *BC Act*.

To support DPHI in making an assessment against Section 7.17 of the BC Act, CPHR advises that it is unlikely that the proposed modification will increase the impact on biodiversity values. Further, CPHR supports the conclusion that the proposed modification will impact areas that would not generate ecosystem or species credits

Advice and response

Section 7.17 of the *BC Act* relates specifically to modification of planning approvals of activities. This relates to both a modification of a development consent or State significant infrastructure approval.

As per subclause 2(c), a further assessment report (BDAR) is not required to be submitted with the application for modification if-

- (i) the authority or person determining the application for modification, or determining the environmental assessment requirements for the application, is satisfied that the modification will not increase the impact on biodiversity values, or
- (ii) the application would, if it were an application for a development consent for the proposed modified development, be exempt from the requirement to be accompanied by a BDAR under an order made under section 7.7(3).

Section 7.7(3) of the *NSW Biodiversity Conservation Act 2016* allows the Minister to issue orders that exempt specific development from the requirement for a biodiversity assessment report (BDAR) under certain exceptional circumstances.

Section 7.7(3) has not been applied to date and therefore subclause 2(c) (i) still applied to the proposal which means that a new or updated BDAR is not required for the proposal because there is no change, or more significantly, no increase in the impact on biodiversity values. Since the commencement of the proposal, there have been no changes to the biodiversity values mapping of the site, and the modified DA will not increase the impacts to remnant native vegetation mapping or requirement for species credit species.

Conclusions

The proposed changes for tree retention and removal are within an area marked as planted native vegetation as opposed to PCT 850 / Cumberland Plain Woodland. These areas are addressed under prescribed impacts in the approved BDAR and are not subject to any biodiversity offset credits.

The Mod 1/Rev 3 DA will require the removal of additional trees near the front entrance of the site for the Sydney Water incoming valve arrangement along Huntingwood Drive. Seven (7) additional trees will be required for removal and one (1) previously approved tree to be removed will now be retained. Overall, there will be a reduction of six (6) trees, and these will be compensated by some additional plantings. There will be equivalent trees planted by this modification in comparison to the approved DA (ie. Retained trees plus planted trees = 607). The landscaping area and canopy coverage will be slightly lower than the approved DA, so to compensate for the small reduction, plantings will be denser at some locations to ensure a no nett loss of proposed plantings than that which has been approved.

The modification has no requirement to be offset as it does not affect areas where ecosystem or species credits would be generated, and no changes to the approved BDAR are required.

To assist with minimising impacts, all piping is underground and is not affecting any trees or landscaping, ensuring that the overall landscaping remains very similar in size to that which has been approved, and any shortcomings will be made up with an increased density.

The proposed modification will have no affectation to the proposed mitigation measures afforded within the approved BDAR.

In accordance with section 7.17 of the *BC Act*, subclause 2(c) (i), the modification will not increase the impact on biodiversity values and therefore a BDAR is not required. As such, the credits that were determined in the original BDAR still apply.

If you require any further information please do not hesitate to contact the undersigned on (02) 4340 5331 or at info@traverseecology.com.au.

Yours faithfully



Lindsay Holmes

Principal Ecologist - ***Travers bushfire & ecology***

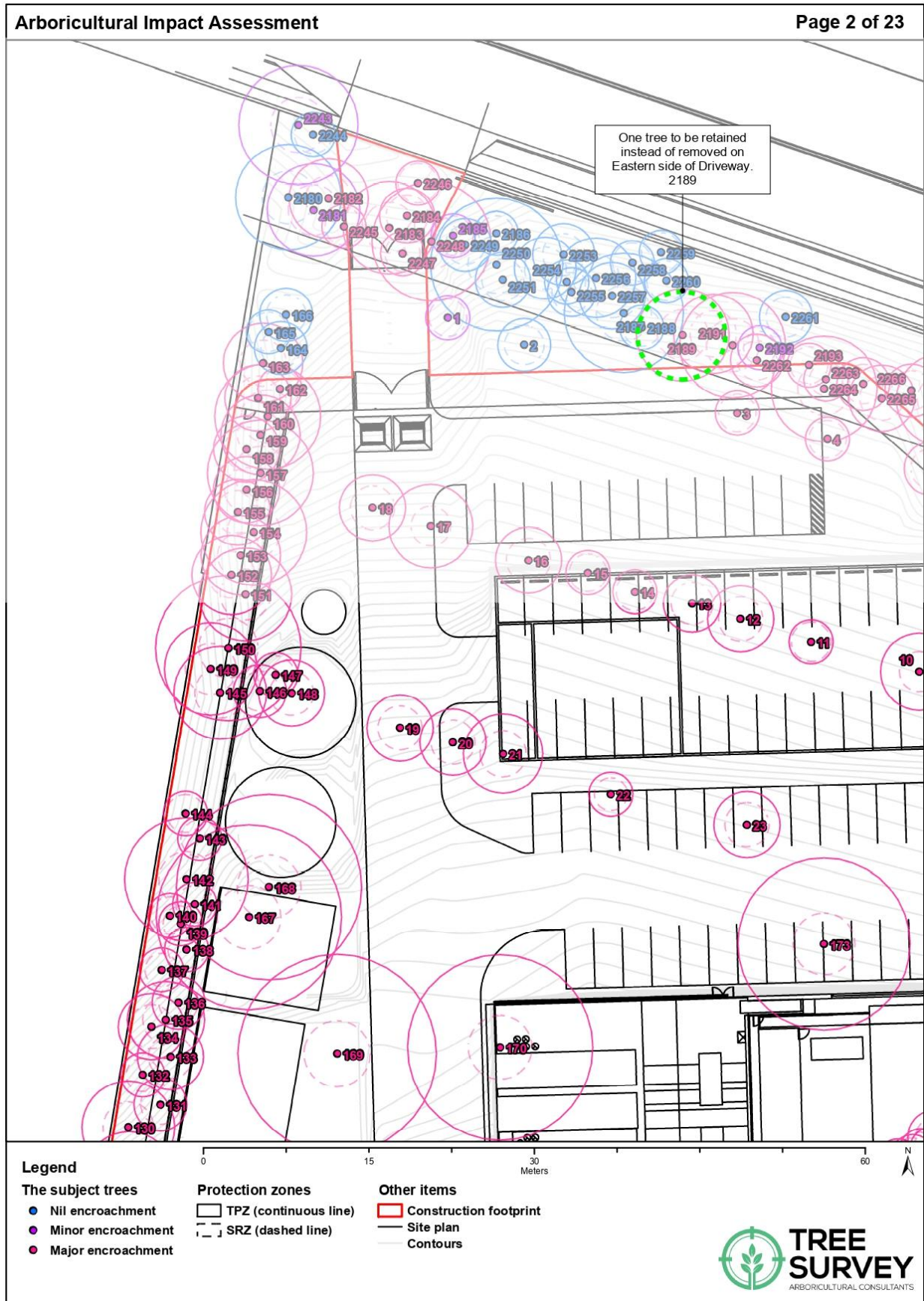
Appendices:

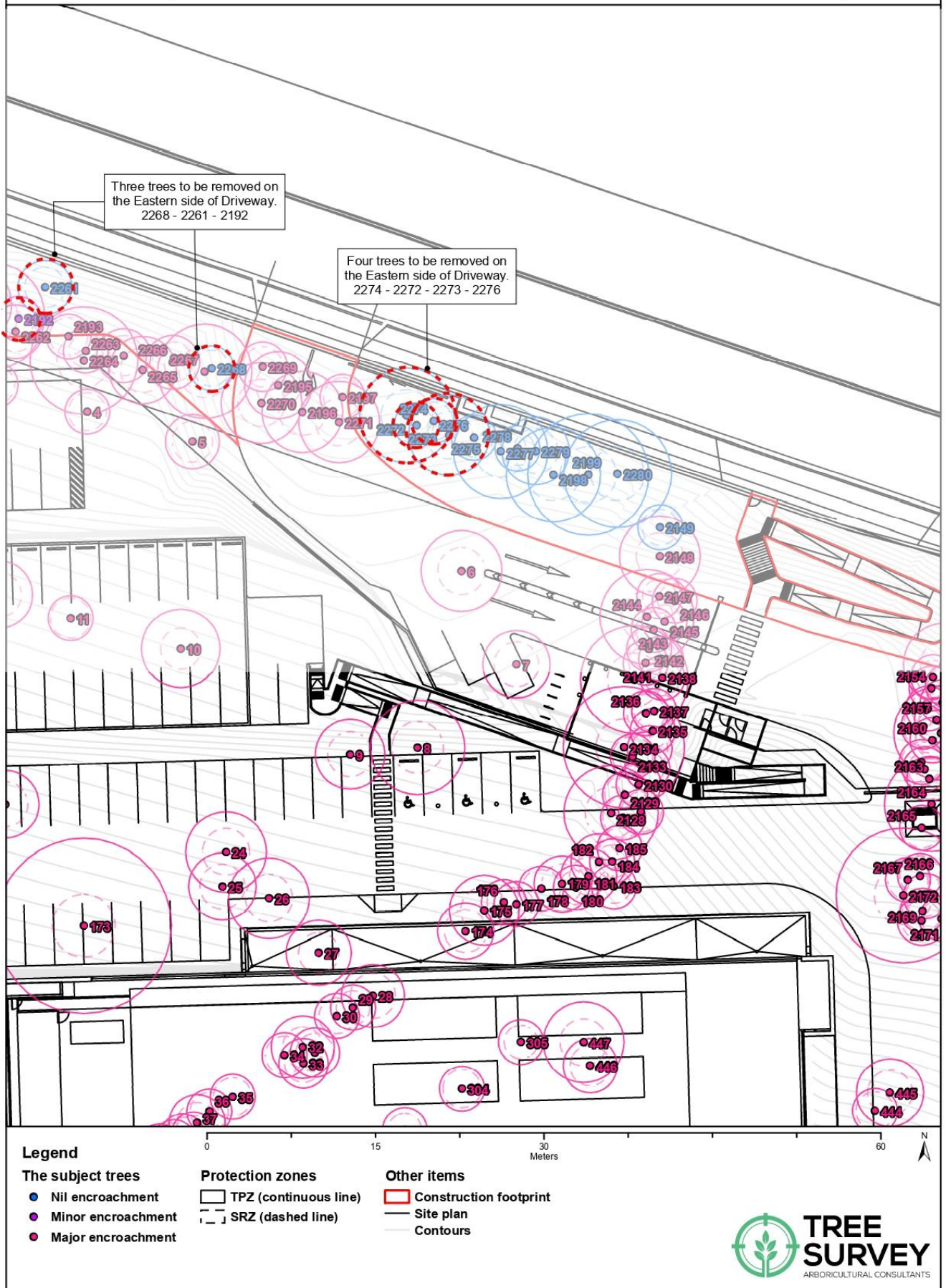
Appendix 1 – Updated Tree Plans

Appendix 2 – Proposed Modifications

Appendix 3 – CPHR Response 2 Dec 2025

Appendix 1 – Updated Tree Plans





Appendix 2 – Proposed Modifications

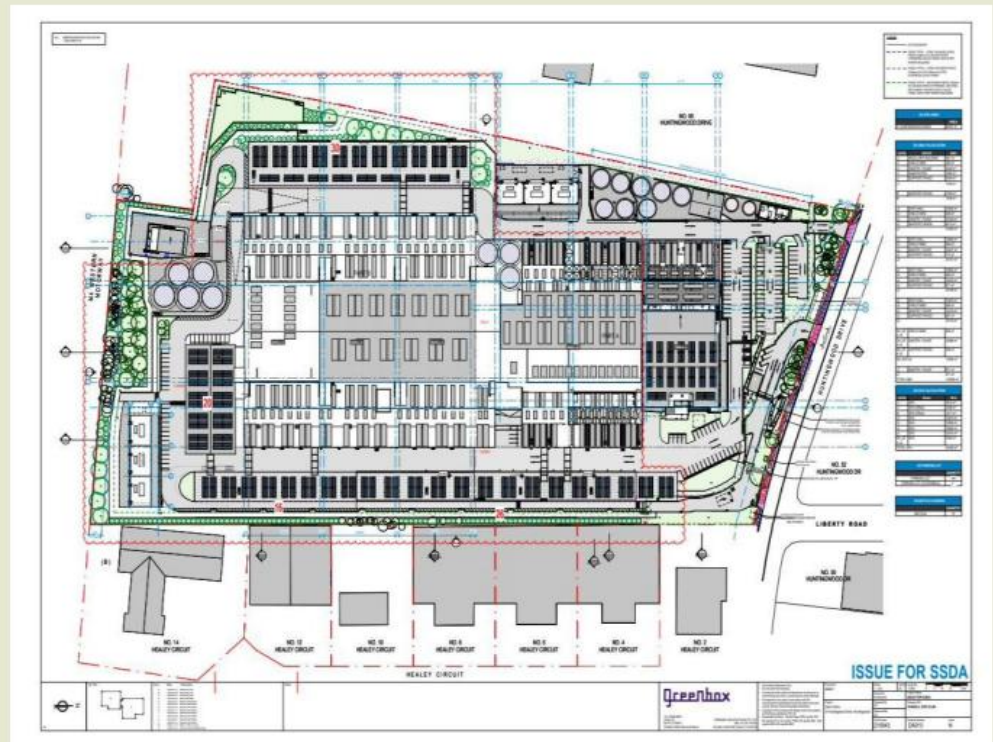
WILLOWTREE PLANNING

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PROPOSED MODIFICATION SSD-41589232 MOD 2 | Proposed Development

 Total GFA 64,346 m²	 Building Height 49.75 m	 Data Shells 5 shells / 72 MW
 Car Parking 149 (6 EV)	 Landscaping 11,270 m²	 Tree Removal 2,137 (Ret: 123)
 Generators 316	 Diesel Storage 4,048 kL	 CIV No change
 Earthworks (cut) 104,654 m³	 Earthworks (fill) 81,600 m³	 Jobs (C / Op) 1,333 / 276

KEY CHANGES FROM SSD: GFA 122,546 → 64,346 m² | 10 → 5 data shells (72 MW) | Landscaping 12,021 → 11,270 m² | 6 EV charging spaces | Dual electrical substations | Southern Tank yard reduced 8 → 5



Proposed Site Plan — Greenbox Architecture (DA/10 Rev N)



DEVELOPMENT COMPARISON

Approved SSD | Previous MOD (Withdrawn) | Proposed Development

Project Element	Approved SSD	Previous MOD (Withdrawn)	Proposed Development
Site Area	90,172.8 m ²	90,172.8 m ²	90,172.8 m ²
General	SSD - Data storage premises (> 10 MW)	SSD - Data storage premises (> 10 MW)	SSD - Data storage premises (> 10 MW)
Primary Land Use	Data Storage Premises	Data Storage Premises	Data Storage Premises
Operation	Data centre (24/7)	Data centre (24/7)	Data centre (24/7)
Total GFA	122,546 m ²	51,062 m ²	64,346 m ²
Building Height	49.75 m	49.1 m	49.75 m
Data Shells	10 shells	6 shells; Shells B, C, D, E increased to 67 MW each	5 shells; Shells B, C, D, E increased to 72 MW each
Tree Removal	Remove: 2,131; Retain: 129	Remove: 2,137; Retain: 123	Remove: 2,137; Retain: 123
Landscaping	12,021 m ²	10,272 m ²	11,604 m ²
Earthworks (cut)	89,100 m ³	104,654 m ³	104,654 m ³
Earthworks (fill)	81,600 m ³	81,600 m ³	81,600 m ³
Car Parking	149 spaces (3 accessible, 10 bicycle)	157 spaces (4 accessible, 10 bicycle)	149 spaces (incl 4 accessible, 6 EV charging, 10 bicycle)
Infrastructure & Services	132 kV transmission; dual 33 kV feeders; potable water; stormwater management	132 kV transmission; dual 33 kV feeders; potable water; stormwater management; ground-level fuel storage; new gantry systems; chiller farms	132 kV transmission; dual electrical substations; potable water; stormwater management; ground-level fuel storage; new gantry systems; chiller farms
Machinery & Plant	316 generators; roof-mounted mechanical plant; 4,048 kL diesel storage	273 generators; ground-level mechanical plant; 4,048 kL diesel storage; ground-level fuel storage; new gantry systems; chiller farms	316 generators; ground-level and roof level mechanical plant; 4,048 kL diesel storage; ground-level fuel storage; new gantry systems; chiller farms
CIV	\$1,074,990,484	No change	No change
Construction Jobs	1,333	1,333	1,333
Operational Jobs	276	276	276

Appendix 3 – CPHR Response 2 Dec 2025



Department of Climate Change, Energy, the Environment and Water

Your ref: SSD-41589232-Mod-1
Our ref: DOC25/1004075

Mr Shaun Williams
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
12 Darcy Street
PARRAMATTA NSW 2150

2 December 2025

Subject: Modification 1 - 51 Huntingwood Drive Data Centre - Reduced Scale (SSD-41589232-Mod-1)

Dear Mr Williams,

Thank you for your referral received 24 November 2025 on the proposed modification to the approved data centre at 51 Huntingwood Drive (SSD-41589232-Mod-1).

The Conservation Programs, Heritage and Regulation (CPHR) Group has reviewed the *Modification Report - 51 Huntingwood Drive Data Centre - S4.55(1A)* (Willowtree Planning, 14 November 2025) and the supporting *Biodiversity Verification Statement* (Travers Bushfire and Ecology, 13 November 2025) and provides the following advice.

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CPHR recommends the modification application is updated to address the requirements of Section 7.17 of the BC Act.

To support DPPI in making an assessment against Section 7.17 of the BC Act, CPHR advises that it is unlikely that the proposed modification will increase the impact on biodiversity values. Further, CPHR supports the conclusion that the proposed modification will impact areas that would not generate ecosystem or species credits.

If you have any further questions about this issue, please contact the Greater Sydney Planning Team via rog.gsrplanning@environment.nsw.gov.au.

Sincerely



Louisa Clark
Director, Greater Sydney
Regional Delivery
Conservation Programs, Heritage and Regulation