

17 November 2025

Adam Pavlovic
Project Manager
Plan Project Management
Level 1, Shop 2A, 17 Macmahon Street,
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Dear Adam,

Letter of advice for Vegetation Management Plan requirements for the Mamre Road Data Centre Campus (SSD-92742706)
Project no. 43542

Biosis Pty Ltd (Biosis) was commissioned by Plan Project Management (PPM) to complete a letter of advice addressing the requirement for a Vegetation Management Plan (VMP) for the Mamre Road Data Centre Campus project, located at 706-752 Mamre Road (Lot 10 DP1280592), Kemps Creek (the study area) in New South Wales (NSW).

The project is being progressed as a State Significant Development (SSD) (SSD-92743706) and PPM is currently securing approvals for the construction of a Data Centre Campus (the Project), which includes the demolition of an existing structure, the infill of man-made dams, and the removal of native and non-native vegetation to allow for the construction of the Project's associated infrastructure.

The study area for the Project (described above) constitutes the main development site and has shared boundaries with areas to the east and south (described below) that are utilised to facilitate roadworks and bulk earthworks for the broader Project:

- Gibb Group site to the East known as 1-22 Bakers Lane, Kemps Creek (Lot 40 in DP 709347).
- GPT Group site to the South known as 754 Mamre Road, Kemps Creek (Lot 180 in DP 1290397).

Additionally, power supply lead-in from Sydney-West Substation is proposed as part of the development, which traverses through multiple landholdings.

It is important to note that the Gibb Group and the GPT Group sites are not assessed in this letter and are therefore not considered further. This letter applies to Lot 10 DP1280592 solely.

Purpose of this letter

Biosis has previously provided the draft Biodiversity Development Assessment Report (BDAR) (Biosis 2025a), the Aquatic and Riparian Assessment Report (Biosis 2025b), and the Weed Eradication and Management Plan (Biosis 2025c) for the Project. Biosis understands that a VMP has also been requested as part of the

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Biosis acknowledges the Aboriginal and Torres Strait Islander peoples as Traditional Custodians of the land on which we live and work. We pay our respects to the Traditional Custodians and Elders past and present and honour their connection to Country and ongoing contribution to society.

Secretary’s Environmental Assessment Requirements (SEARs) issued for the Project. Specifically, the VMP has been requested as part under the Landscaping issue section of the SEARs.

This letter seeks to determine whether there is a legislative trigger for the requirement for a VMP for this project, or whether the SEARs requirement can likely be removed.

VMP requirement for SEARs SSD-92742706

Typically, a VMP would be required where a controlled activity (as regulated by the NSW *Water Management Act 2000* [WM Act]) is carried out on waterfront land. Whilst there is an existing watercourse mapped within the study area, this watercourse has been previously altered with human-made dams and lacks a riparian corridor, these features are to be removed as part of the proposed works. Furthermore, the project is exempt from the need to secure controlled activity approval, as detailed in Section 4.41 of the NSW *Environmental Planning & Assessment Act 1979*. As such there is no clear trigger for a VMP under the WM Act.

Alternatively, given the VMP is detailed under the Landscaping section of the SEARs, it could be triggered as requirement of the *Mamre Road Precinct Development Control Plan 2021* (MRP DCP) (DPIE 2021). Table 1 below includes an assessment against the *Mamre Road Precinct* MRP DCP to identify whether there are any triggers for a VMP within the DCP.

Table 1 VMP requirement within SEARs SSD-92742706

Request Item in SEARs	Items of relevance to this letter	Summary Response
<p>Landscaping – a detailed site-wide landscape plan, including:</p> <ul style="list-style-type: none"> an arborist report, tree protection plan and vegetation management plan detailed plans showing suitable landscaping which incorporates endemic species, heights of trees at maturity and proposed canopy coverage and location of trees to be removed and retained details of tree canopy cover, deep soils and pervious area to meet the requirements of the MRP DCP demonstration of how the development would contribute to the long-term landscape setting in respect of the site and streetscape, contribute to the objective of increased urban tree canopy cover, mitigate the urban heat island effect and maximise opportunities for green infrastructure consistent with Greener Places (GANSW, 2020) and having regard to any bush fire risk demonstration of consistency with the MRP DCP species list. 	<p>This letter is restricted to the address of a component of the first <i>Landscaping</i> sub-item: <i>a vegetation management plan</i>.</p> <p>Also relevant to this VMP sub-item, is the requirement for the VMP’s consistency with the MRP DCP.</p> <p>Notably as vegetation management is associated with waterfront land in some cases, the Project has been assessed against the WM Act and <i>Fisheries Management Act 1994</i> in the Project’s BDAR. As detailed above, as the project is an SSD it is exempt from needing controlled activity approvals.</p>	<p>The Project’s development footprint encompasses the entirety of Lot 10 DP1280592, 706-752 Mamre Road, Kemps Creek, NSW (the study area).</p> <p>All biodiversity values in the study area are proposed to be removed as part of the site preparation associated with the Project, including dam and waterway infill, removal of all vegetation and demolition of one existing dilapidated residential building.</p> <p>The MRP DCP requires a VMP for “...rehabilitation or conservation of native vegetation and habitat... on land located within E2 Environmental Conservation, RE1 Public Recreation or a Riparian Corridor...”. However, the Project does not propose to rehabilitate or conserve native vegetation or habitat within the study area post-construction. The study area is also situated within land zoned as General Industrial (IN1). As such a VMP is not required under the MRP DCP.</p>

Conclusion

The VMP is requested as a SEARs requirement, however as outlined above, is not considered a requirement from a biodiversity standpoint under either the WM Act or to satisfy the MRP DCP. It is our view therefore that there is no legislative trigger for the inclusion of a VMP within the SEARs for the Mamre Road Data Centre Campus project (SSD-92743706). I trust that this advice is of assistance to you however please contact me if you would like to discuss any elements of this ecological advice further.

Yours sincerely,



Matthew Hyde
Team Leader – Operations and BDP (NSW Ecology)

References

Biosis 2025a. *Mamre Road Data Centre Campus BDAR*.

Biosis 2025b. *706-752 Mamre Road Kemps Creek: Aquatic and Riparian Assessment Report*.

Biosis 2025c. *706-752 Mamre Road Kemps Creek: Weed Eradication Management Plan*.

DPIE 2021. 'Mamre Road Precinct Development Control Plan 2021', Department of Primary Industry and Environment, Sydney, NSW.

https://www.planningportal.nsw.gov.au/sites/default/files/documents/2021/Mamre%20Road%20Precinct%20DCP%202021_0.pdf.