



Emma Butcher
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Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

3 February 2026

Subject: Environmental Impact Statement – Bullecourt Avenue, Milperra - Early Works and Stage 1 (SSD-97092958) (Canterbury-Bankstown)

Dear Emma,

Thank you for your referral received on 8 December 2025, requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water on the above State significant development project.

CPHR has reviewed the *Environmental Impact Statement* (Beam Planning, 17 November 2025) and relevant supporting technical reports and provides its comments and recommendations at Attachment A. In summary:

Biodiversity

CPHR recommends that the Vegetation Management Plan be revised to incorporate all requirements outlined in Chapter 11.13, Appendix A of [Canterbury-Bankstown Development Control Plan 2023](#), and include reference to the Hollow Offset Replacement Strategy and Nestbox Management Plan.

CPHR has identified an inconsistency between the Biodiversity Development Assessment Report and the Landscape Masterplan regarding the proposed connected canopy between the C2 Environmental Conservation zoned lands and the M5 Motorway. To address this, the Landscape Masterplan should be revised to include this connected canopy in the sitewide vision and principles section.

Flooding

The Flood Impact and Risk Assessment (FIRA) relies on off-site emergency evacuation via internal roads, however flood mapping shows that one internal street is subject to high flood hazard (H5) during the probable maximum flood (PMF). This may potentially isolate residents if evacuation does not occur before conditions worsen. A revised FIRA should include a more detailed assessment of the individual hazard category by referring to the stability thresholds in the Flood Risk Management Guideline [FB03 Flood Hazard](#).

Should you have any queries regarding this matter, please contact Angela Stewart, Senior Conservation Planning Officer, via angela.stewart@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Kerry Richardson', with a stylized, cursive script.

Kerry Richardson
Director, Conservation Planning and Assessment
Conservation Planning and Offsets
Conservation Programs, Heritage and Regulation Group

CPHR advice on EIS – Bullecourt Avenue, Milperra - Early Works and Stage 1 (SSD- 97092958) (Canterbury-Bankstown)

In preparing this advice CPHR has reviewed the following documents:

- Environmental Impact Statement (EIS) – Residential Development 2 and 2A Bullecourt Avenue, Milperra (Beam Planning, 17 November 2025)
- Appendix F – Plan of Subdivision (Beveridge Williams, 31 October 2025)
- Appendix G – Architectural Drawings (Mirvac Design, 31 October 2025)
- Appendix H – Landscape Masterplan (Urbis, 31 October 2025)
- Appendix I – Vegetation Management Plan (Cumberland Ecology - SLR, 31 October 2025)
- Appendix J – EPBC Act Self-Assessment (Cumberland Ecology - SLR, 31 October 2025)
- Appendix K – Biodiversity Development Assessment Report (BDAR) (Cumberland Ecology - SLR, 17 November 2025)
- Appendix L – Arboricultural Impact Assessment (Temporal Tree Management, 5 November 2025)
- Appendix O – Housing Landscape Architectural Plans (Urbis, 21 October 2025)
- Appendix Q – Bushfire Hazard Analysis (Black Ash, 15 October 2025)
- Appendix CC – Civil Engineering Plans (Beveridge Williams, 29 October 2025)
- Appendix DD – Flood Impact and Risk Assessment (FIRA) (Beveridge Williams, 14 November 2025)
- Appendix OO – Civil Engineering Design Report (Beveridge Williams, 14 November 2025)
- Appendix QQ – Zoning Overlay Plan (Beveridge Williams, 29 October 2025)
- Appendix SS – Master Staging Plan (Beveridge Williams, 29 August 2024).

Biodiversity

Key assessment issues

1.	Integration of the Vegetation Management Plan (VMP) with the Hollow Offset Replacement Strategy and Nestbox Management Plan	The VMP does not mention the Hollow Offset Replacement Strategy and Nestbox Management Plan that were both prepared in 2024. Recommended action: To ensure vegetation restoration and fauna replenishment within the VMP are appropriately integrated, update the VMP to reference the Hollow Offset Replacement Strategy and Nestbox Management Plan, including any recommendations.
	<i>Extent and Timing</i>	Response to Submissions
2.	Compliance of VMP with the Canterbury-Bankstown Development Control Plan 2023	The Canterbury-Bankstown Development Control Plan 2023 (CB DCP 2023) sets out a number of requirements for the VMP. However, the VMP does not include or address the following two requirements from Appendix A – Matters to be addressed in Cumberland Plain Woodland Management (C2 Environmental Conservation zoned land) (C2): • A permanent fence must be placed around the C2 area and must be designed to allow for the safe movement of arboreal fauna outside of the southern boundary of the C2 zoned land. There is no mention in the VMP of this requirement or how it would be met. • Removal of vegetation - G4: The proponent must identify where practicable to reuse any of the native trees that are approved for removal from the site, including tree hollows and tree trunks (greater than 25–30cm in diameter and 3m in

		length), and rootballs to enhance habitat. There is no mention that this requirement would be undertaken. Recommended action: Revise the VMP to be compliant with the requirements of the CB DCP 2023.
	<i>Extent and Timing</i>	Response to Submissions
3.	Consistency between BDAR and Landscape Masterplan	The BDAR states that the Landscape Masterplan proposes a connected canopy between the C2 zoned lands and the M5 Motorway. This proposed habitat corridor is shown in Figure 18 of the BDAR. However in comparison, Section B.2 of the Landscape Masterplan only provides a general mention of Continuous Green Corridors. Recommended action: Revise the Landscape Masterplan to specifically refer to a north-south connected canopy in the Sitewide Landscape Vision and Principles section.
	<i>Extent and Timing</i>	Response to Submissions

Flooding

Key assessment issues

4.	Emergency management	The FIRA proposes off-site self-evacuation as the primary emergency management strategy which is facilitated by an internal road network that provides rising access to flood-free land. However, CPHR's review of the flood hazard mapping indicates that one internal street is subject to high flood hazard (H5) during the probable maximum flood (PMF). Under H5 conditions, vehicle access would be unsafe and residents who have not evacuated prior to flood hazard reaching H2 would become isolated. CPHR notes that the flood hazard mapping was derived using general flood hazard vulnerability curves which provide a practical and widely adopted tool for assessing hazard levels for people, vehicles, and buildings by using a single consolidated set of curves. CPHR advises that a more detailed assessment of an individual hazard category is required. The Flood Risk Management Guideline FB03 Flood Hazard (FB03 guideline) provides separate vulnerability curves for people, vehicles and buildings. For example, the current application of the general hazard curves may overstate the risk to vehicles, as the mapped H5 hazard along the affected internal road is associated with shallow flood depths of less than 0.25m. Under these conditions, the use of vehicle stability thresholds in the FB03 guideline would provide a more appropriate assessment of vehicle trafficability and feasibility of emergency evacuation. Recommended action: Revise the FIRA to address the emergency management requirements by referring to stability thresholds in the FB03 guideline. The following options are to be considered in the revised FIRA: • <u>Option 1</u> - Demonstrate that all evacuation routes are safe for vehicles in all flood events up to and including the PMF.
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		• <u>Option 2</u> - Demonstrate that sufficient warning time is available to allow all residents to self-evacuate off-site before internal roads become non-trafficable. • <u>Option 3</u> - Demonstrate that any residents who are unable to evacuate prior becoming isolated can safely shelter in place for the full duration of the PMF event.
	<i>Extent and Timing</i>	Response to Submissions

End of Submission