



Your ref: SSD-77458970
Our ref: DOC26/55740

Fadi Shakir
Senior Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

2 March 2026

Subject: Environmental Impact Statement – Mixed-use residential and commercial development (SSD-77458970)

Dear Fadi,

Thank you for your referral received 2 February 2026 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group on the Environmental Impact Statement (EIS) for this State significant development located at 135 Badgerys Creek Road, Bradfield.

CPHR has reviewed the *Environmental Impact Statement SSD-77458970 | Mixed Use Development* (Colliers, 12 January 2026) (EIS) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- Biodiversity – there are inconsistencies in the EIS regarding allowable tree canopy cover, requiring and the applicant must justify or amend the proposed vegetation management approach before determination. Conditions of consent must also incorporate the specifications outlined in the technical reports, including those relating to fauna and flora, vegetation management, weed eradication, and arboricultural assessments.
- Flooding – the proposed development will increase flooding and hazard levels on a neighbouring property, and these impacts must be communicated to affected owners. Although the site remains accessible during major floods, an internal road would be cut in the probable maximum flood (PMF) event, and the Flood Emergency Response Strategy should identify this road for closure during rare floods.

Should you have any queries regarding this matter, please contact Senior Conservation Planning Officer at peter.braga@dcceew.nsw.gov.au.

Yours sincerely,

Susan Harrison
**Senior Team Leader Planning, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR advice on EIS - Mixed-use residential and commercial development, 135 Badgerys Creek Road, Bradfield

In preparing this advice, CPHR has reviewed the following documents:

- *Environmental Impact Statement SSD-77458970 | Mixed Use Development* (Colliers, 12 January 2026)
- *135 Badgerys Creek Road, Bradfield NSW – Biodiversity Assessment* (Ecological Australia, 14 November 2025) (Biodiversity Assessment)
- *Arboricultural Impact Assessment* (Creative Planning Solutions, 29 September 2025) (AIA)
- *135 Badgerys Creek Road, Bradfield – Riparian Assessment* (Ecological Australia, 10 October 2025) (Riparian Assessment)
- *135 Badgerys Creek Road, Bradfield NSW – Vegetation Management Plan* (Ecological Australia, 10 October 2025) (VMP)
- *135 Badgerys Creek Road, Bradfield NSW – Fauna and Flora Management Plan* (Ecological Australia, 14 November 2025) (Fauna and Flora Management Plan)
- *135 Badgerys Creek Road, Bradfield NSW – Weed Eradication Management Plan* (Ecological Australia, 10 October 2025) (Weed Eradication Management Plan)
- *Bushfire Hazard Assessment – Proposed Mixed-use Development 135 Badgerys Creek Road, Bradfield* (Blackash Bushfire Consulting, 12 January 2026) (Bushfire Assessment)
- *135 Badgerys Creek Road – SSDA Flood Impact and Risk Assessment* (ADP Consulting, 14 November 2025) (FIRA)
- *Landscape SSDA Design Report* (Land and Form Studios, September 2025).

Biodiversity

Key Assessment Issues

1	<i>Recommendations from the Bushfire Assessment and Landscape Design Report & Plan do not match the management of vegetation cover</i>	The Bushfire Assessment indicates that the site will be managed to inner protection area (IPA) standards in accordance with the Planning for Bush Fire Protection 2019 (NSW Rural Fire Service, November 2019)(PBP 2019) which states that tree canopy cover should be less than 15%. The Landscape SSDA Design Report states the proposed target canopy coverage is 21%. Recommended action: Confirm the Landscape SSDA Design Report are compliant with PBP 2019 or provide further justification in the Bushfire Assessment that the increase canopy coverage is appropriate.
	<i>Extent and timing</i>	Pre-determination

2	<i>Include Conditions of Consent as specified by the technical reports</i>	Several of the EIS appendices outlined specifications for implementation and measuring performance of pre-construction and post-construction works. The conditions of consent related to biodiversity must include these specifications. Recommended action: Conditions of consent in relation to biodiversity, include the specifications/recommendations outlined in following reports: • Fauna and Flora Management Plan • Vegetation Management Plan
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		• Weed Eradication Management Plan • Arboricultural Impact Assessment
	<i>Extent and timing</i>	Condition of consent

Flooding

Key Assessment Issues

3	<i>Flood impacts</i>	The FIRA has assessed the overland flooding occurring near the site. The proposed development will significantly affect the adjoining property to the north in the PMF event, increasing the extent of flooding and elevating hazard category. Recommended action: The adverse impacts are communicated to the affected property owners.
	<i>Extent and timing</i>	Pre-determination

4	<i>Emergency Management</i>	The site appears to be accessible in all flood events including the PMF through the proposed Innovation Road which runs along the southern boundary of the site to Badgerys Creek Road which is impacted by H1 hazard flow in the PMF. The 'Proposed New Street' that bisects the site will be cut in the PMF and should be avoided in larger flood events. Recommended action: Update the business Flood Emergency Response Strategy to specify that the 'Proposed New Street' is to be closed during rare flood events.
	<i>Extent and timing</i>	Pre-determination

End of Submission