



Matthieu Santoso
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Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

30 March 2026

Subject: SEARs Advice - Shop-top Housing Development at 99-101 Pyrmont Bridge Road and 190-196 Parramatta Road, Annandale (SSD-109924990) (Inner West)

Dear Lachlan,

Thank you for your referral received on 18 February 2026, requesting input from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water the Planning Secretary's environmental assessment requirements (SEARs) for the above project.

CPHR has reviewed the *Scoping Report* (Dickson Rothschild Design, 13 March 2026) and recommends the proponent address the requirements below and at Attachment A.

Biodiversity assessment requirements

In relation to point 4 of the recommended biodiversity environmental assessment requirements, please note the minimum information and spatial data requirements are in Tables 24 and 25 of the [Biodiversity Assessment Method 2020 \(BAM\)](#). Other requirements, such as those relating to the BAM Calculator and Biodiversity Offset Assessment Management System, are detailed in the [guides, tools and databases](#) webpage.

Should you have any queries regarding this matter, please contact the Central Metropolitan Team at rog.gsplanning@environment.nsw.gov.au.

Yours sincerely,

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

CPHR Environmental Assessment Requirements SEARs request for Shop-top Housing Development (SSD-109924990) (Inner West)

<p>Biodiversity</p> <ol style="list-style-type: none"> 1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act), the Biodiversity Assessment Method 2020 (BAM) and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the BC Act (s 6.12), <i>Biodiversity Conservation Regulation 2017</i> (s 6.8) and BAM, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations). 2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM. 3. The BDAR must include details of the measures proposed to address the offset obligation as follows: <ul style="list-style-type: none"> • The total number and classes of biodiversity credits required to be retired for the development/project. • Any proposal to make a payment to the Biodiversity Conservation Fund. 4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM. 5. The BDAR must be prepared by a person accredited in accordance with the <i>Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017</i> under s 6.10 of the BC Act.
<p>Flood Assessment</p> <ol style="list-style-type: none"> 6. The EIS must include a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Risk Management Guideline LU01 Flood impact and risk assessment. The FIRA is to be prepared by suitably qualified engineers with experience in flood risk management in NSW. As a minimum the FIRA must: <ul style="list-style-type: none"> • Identify and describe post development scenario(s) for flood behaviour, constraints and risk on the site and its surrounding areas for the full range of abovementioned events. Details of the development must be included in the verified models. • Provide mapping of flood behaviour for existing conditions and post development scenarios for both mainstream flooding and local overland flooding for the 5%, 10%, 1%, and 0.5% or 0.2% AEP and PMF as well as the 1% AEP behaviour under climate change. • Identify and describe the flood constraints on the land (flood ways, flood storage, flood hazard and emergency response issues) for the full range of abovementioned events, for both mainstream flooding and local overland flooding. • Assess the appropriateness of the development or development types for the location based on the flood constraints on the land. • Demonstrate the consistency with the: <ul style="list-style-type: none"> ○ Inner West Local Environmental Plan and Development Control Plan ○ The Ministerial Direction 4.1 Flooding ○ The Flood Risk Management Manual 2023 and associated guides, ○ Planning circular PS 24-001: Update on addressing flood risk in planning decisions, ○ Any adopted flood study and/or floodplain risk management plan adopted by Inner West Council.

- Identify the impacts of the development on flood behaviour and risk for the abovementioned flood events.
- Identify and assess the adequacy of management measures and controls to:
 - effectively address flood constraints to ensure the flood risks to the proposed development and its users are acceptable, and
 - manage flood and associated emergency management impacts due to the development on existing communities and individual property owners and occupiers.
- Address flood-related emergency response issues and site access arrangements, in accordance with [Flood Risk Management Guideline EM01 Support for Emergency Management Planning](#).
- Assess climate change impacts on flood behaviour in accordance with [Flood Risk Management Guideline FB01 Understanding and managing flood risk](#).

Note: Flood modelling is to be undertaken by a suitably qualified engineer consistent with Council's requirements and Australian Rainfall and Runoff. Flood behaviour includes flood volume, extent, depth, level, velocity, duration, rate of rise, flood function and hazard. Flood risk is a function of flood behaviour, exposure and vulnerability for each element at risk. Impacts of flooding include changes to flood behaviour and risks to the community including emergency management response for the community.

Water and Soils

7. The EIS must map the following features relevant to water and soils including:
 - Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
 - Rivers, streams, wetlands, estuaries (as described in s.4.2 of the BAM).
 - Wetlands as described in s.4.2 of the BAM.
 - Groundwater.
 - Groundwater dependent ecosystems.
8. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
 - Existing surface and groundwater.
9. The EIS must assess the impact of the development on hydrology, including:
 - Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
 - Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
 - Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).

End of Submission