



Your ref: SSD-79844224
Our ref: DOC26/192374

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

19 May 2026

Subject: Environmental Impact Statement – Mixed-use development with in-fill affordable housing at 215 and 229-239 Pitt Street, Merrylands (SSD-79844224)

Dear Edwina,

Thank you for your referral received 2 April 2026, 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 project.

CPHR has reviewed the Environmental Impact Statement (Mecone, 26 March 2026) and relevant supporting technical reports and provides detailed flooding comments at **Attachment A**.

The development is consistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 26 February 2025. Please note, if the proposed development is changed so that it is no longer as described in Schedule 1 of the determination, the applicant will need to lodge a new BDAR waiver request or prepare a BDAR.

Should you have any queries regarding this matter, please contact the Greater Sydney Planning team at rog.gsrplanning@dcceew.nsw.gov.au.

Yours sincerely,

S. Harrison

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

CPHR comments on the Environmental Impact Statement – Mixed-use development with in-fill affordable housing at 215 and 229-239 Pitt Street, Merrylands (SSD-79844224)

Documents Reviewed

CPHR has reviewed the following documents and provides comments below:

- *Environmental Impact Statement* (Mecone, 26 March 2026)
- Appendix K – Civil Engineering Plans (EI Consulting Engineers, 8 October 2025)
- Appendix T – Flood Impact Risk Assessment (EI Consulting Engineers, October 2025).

Key Assessment Issues

Flooding

1.	FIRA has not addressed the SEARs	The Flood Impact Risk Assessment (FIRA) has not addressed the Secretary environmental assessment requirements (SEARs) for the SSD. The following information has not been provided: • Flood levels are only provided for the existing 1% Annual Exceedance Probability (AEP) event and the Probable Maximum Flood (PMF) scenarios. Post-development flood levels are not included. • The FIRA has not provided mapping of flood behaviour including depth, velocity, hazard and flood function. • The FIRA has not considered other events or sensitivity analysis, including the impacts of climate change. • The proposal has not considered the PMF in its design or emergency response. The FIRA provides an evacuation route which enters high hazard flooding and states that evacuation is highly risky in a flood event. The FIRA also recommends shelter in place but has not demonstrated consistency with the design requirements identified in the Shelter in Place Guideline for flash flooding (DPHI, 2025). Furthermore, the floor levels and basement car park levels have been designed to the 1% AEP + Freeboard, which is 2m lower than the PMF level. Recommendation: Prepare a FIRA that is consistent with Flood risk management guideline LU01 - Flood impact and Risk Assessment. The FIRA is to: • Identify flood behaviour (depth, velocity, hazard and flood function) in the existing and proposed scenarios. • Identify the impact of the development on flood behaviour and the impacts of climate change on the development. • If shelter in place is determined to be the most suitable emergency response, demonstrate consistency with the Shelter in Place Guideline for flash flooding (DPHI, 2025). • Any mitigation measures are clearly described and modelled (where necessary). This is not an exhaustive list, and the applicant should refer to the abovementioned guideline.
	Extent and Timing	Prior to determination

End of Submission