



Department of Planning, Housing, and Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Mr Najeeb Kobeissi

Dear Mr Kobeissi

**RE: Concept & Stage 1 – ANZAC Village Seniors Housing, 90 Veterans Parade, Narrabeen (SSD-85869467)**

Thank you for your referral via the Major Projects Portal dated 29 April 2026 on the proposed seniors housing development at 90 Veterans Parade, Narrabeen seeking comments from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEE). In preparing this advice we have sought technical input on all matters concerning flooding and waterway health from the Marine, Coastal Estuaries and Flooding (MCEF) team within CPHR.

We have reviewed the documents supplied and advise that issues with the Biodiversity Development Assessment Report (BDAR) have been identified. Key biodiversity issues outlined in **Attachment 1** include:

- The BDAR underestimates impacts by excluding required vegetation clearing
- The Biodiversity Assessment Method Calculator (BAM-C) incorrectly includes a management zone for non-impacted areas, reducing calculated impacts and biodiversity credit obligations.
- Insufficient evidence has been provided to justify the classification of planted native vegetation and the use of the streamlined assessment module.
- Native vegetation within the 1,500 m buffer appears incomplete, potentially affecting landscape-scale assessment outcomes.
- The justification for PCT selection is limited and requires further justification.
- Microbat habitat constraints and survey effort require further justification given the presence of potentially suitable rocky roosting habitat.
- Additional targeted mitigation measures should be proposed for threatened fauna species recorded or assumed present, including powerful owl, southern myotis, and barking owl.

Several of the issues above will require comprehensive revision of key aspects of the BDAR, including changes to the total impact area and biodiversity credit obligation. As such, CPHR have not undertaken a detailed review of the BAM-C at this time. We will conduct a detailed review of the BAM-C once the matters above are resolved.

MCEF have also identified flooding issues. Key matters outlined in **Attachment 2** include:

- Hazards on internal roads and around buildings should be reduced to “low hazard” by design changes.
- Internal drainage, in particular large culverts which cross the major flow paths, must be designed and modelled as part of the Flood Impact and Risk Assessment (FIRA).
- Flood mitigation is required to ensure that no additional risk occurs to existing residents or roadways on site.
- The FIRA needs to address the risk of isolation in a flood event.

If you have any questions regarding advice on biodiversity matters, please contact the Planning Coordination and Advice Team at [pca@dcceew.nsw.gov.au](mailto:pca@dcceew.nsw.gov.au). Any queries regarding advice on flooding and waterway health should be directed to the MCEF team at [planningreferrals.mcefgs@dcceew.nsw.gov.au](mailto:planningreferrals.mcefgs@dcceew.nsw.gov.au).

Yours sincerely



**NAOMI GOLIGHTLY**  
**A/ Senior Manager Planning Coordination and Advice**  
**Conservation Planning and Assessments**  
**Conservation Programs, Heritage and Regulation**

25 May 2026

Attachment 1: CPHR Biodiversity Comments

Attachment 2: Marine Coast Estuary and Flood comments

**Attachment 1: CPHR Biodiversity Comments - SSD-85869467**

<b>Biodiversity Issue 1</b>	<b>Comments</b>
<p>Total Vegetation Clearing</p>	<p>The Biodiversity Development Assessment Report (BDAR) has not adequately accounted for impacts to native vegetation and threatened species habitat associated with the proposed development. Specifically:</p> <ul style="list-style-type: none"> <li>• The BDAR excludes areas of native vegetation clearing that are required to facilitate the project.</li> <li>• It is unclear whether the assessment incorporates additional clearing that may occur within existing Asset Protection Zones (APZs).</li> </ul> <p>All vegetation clearing associated with the development must be assessed as a direct impact and included within the total development footprint. This requirement extends to all current and future clearing entitlements associated with the proposed land use.</p> <p>This includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Clearing permitted under the <i>10/50 Vegetation Clearing Code</i></li> <li>• Clearing required to achieve compliance with <i>Planning for Bush Fire Protection (2019)</i>.</li> </ul> <p>Incorporating these additional areas of impact may require comprehensive revision of the BDAR and may affect multiple components of the assessment, including:</p> <ul style="list-style-type: none"> <li>• The applicability of the <i>Streamlined Assessment Module – Small Areas</i></li> <li>• Plant Community Type (PCT) mapping</li> <li>• Biodiversity offset calculations</li> <li>• Identification and assessment of candidate threatened species</li> </ul> <p><b>Recommendations:</b></p> <ol style="list-style-type: none"> <li>1. Identify, quantify, and assess all native vegetation removal required within existing and proposed Asset Protection Zones</li> <li>2. Include all vegetation clearance required for the project, including clearing required under both the <i>10/50 Vegetation Clearing Code</i> and <i>Planning for Bush Fire Protection 2019</i>.</li> <li>3. Update the BDAR to incorporate the additional areas of impact.</li> </ol>
<p><i>Timing</i></p>	<p><i>Pre-determination</i></p>

<b>Biodiversity Issue 2</b>	<b>Comments</b>
<p>Biodiversity Assessment Method Calculator (BAM-C)</p>	<p>Table 16 of the BDAR indicates that impacts to native vegetation have been divided into two management zones within BAM-C:</p> <ul style="list-style-type: none"> <li>• A management zone representing areas of vegetation clearance</li> <li>• A management zone representing impacts that have been excluded from the assessment (refer to Biodiversity Issue #1).</li> </ul>

	<p>The inclusion of a management zone for areas not subject to impact is inappropriate and results in an underestimation of the project's overall biodiversity impacts. Specifically, it reduces the calculated future vegetation integrity loss associated with the entire development. Management zones should only represent areas subject to impacts. The inclusion of non-impacted areas affects the assessment outcomes, including the calculation of biodiversity credit obligations.</p> <p><b>Recommendation:</b></p> <p>4. Remove the management zone associated with excluded areas and recalculate the project's total biodiversity credit obligation to accurately reflect the full extent of vegetation impacts.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Biodiversity Issue 3</b>	<b>Comments</b>
Planted Native Vegetation	<p>Figure 7 of the BDAR indicates that the project area comprises a mosaic of planted native vegetation and naturally occurring vegetation. The BDAR states that areas of planted native vegetation to be impacted are clearly distinguishable from surrounding and adjacent remnant vegetation.</p> <p>Given the apparent complexity and intermixing of planted and naturally occurring vegetation within the project area, the current level of detail provided in the BDAR is insufficient to justify the application of the <i>Streamlined Assessment Module – Planted Native Vegetation</i>.</p> <p>To support the proposed classification, the BDAR should provide clear, verifiable evidence demonstrating that the delineation of planted native vegetation is accurate. This should include:</p> <ul style="list-style-type: none"> <li>• Geo-referenced site photographs</li> <li>• Detailed descriptions of vegetation characteristics for each mapped area identified as planted native vegetation.</li> </ul> <p>In the absence of clear evidence, a precautionary approach should be adopted; whereby uncertain or ambiguous areas are assessed under the full Biodiversity Assessment Method (BAM).</p> <p>CPHR suggest that a site visit may be the most efficient approach to resolve the delineation between naturally occurring and planted native vegetation within the project area.</p> <p><b>Recommendations:</b></p> <p>5. Provide detailed justification for all areas mapped as planted native vegetation, including geo-referenced photographs and descriptive site information.</p> <p>6. Where the distinction between planted and naturally occurring vegetation cannot be clearly demonstrated, assess these areas under the full BAM.</p> <p>7. If uncertainties remain following the provision of additional information, arrange a site visit with CPHR to verify vegetation classification and confirm the appropriate assessment approach.</p>
<i>Timing</i>	<i>Pre determination</i>

<b>Biodiversity Issue 4</b>	<b>Comments</b>
Native Vegetation Landscape Assessment	<p>Figure 5 of the BDAR indicates that portions of native vegetation within the 1,500 m buffer area may not have been fully captured in the landscape-scale mapping. This appears to include:</p> <ul style="list-style-type: none"> <li>• Areas of vegetation surrounding Narrabeen Lagoon</li> <li>• Smaller, fragmented patches of native vegetation located within urban areas to the south of the project site.</li> </ul> <p><b>Recommendation:</b></p> <p>8. Revise the native vegetation landscape assessment to ensure all areas of native vegetation are included.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Biodiversity Issue 5</b>	<b>Comments</b>
Plant Community Type (PCT) Selection	<p>Table 8 of the BDAR details the rationale for selecting the best-fit PCT within the project area. However, several aspects of the justification appear insufficient or not adequately supported:</p> <ul style="list-style-type: none"> <li>• Certain PCTs have been excluded from consideration based solely on landscape position, without sufficient regard to floristic composition or site-specific characteristics.</li> <li>• PCT 3592 has been identified as the best-fit PCT primarily on its alignment with State Vegetation Type Mapping (SVTM), despite the presence of alternative PCTs that are more locally dominant in the surrounding area.</li> </ul> <p>Further detail and justification, focusing on the floristic comparison of collected plot data and edaphic factors, should be provided. Where vegetation within the project area is degraded or disturbed, the assessment should include consideration of the surrounding intact native vegetation patches. This comparative assessment should be undertaken against the following shortlisted PCTs:</p> <ul style="list-style-type: none"> <li>• PCT 3040</li> <li>• PCT 3593</li> <li>• PCT 3592</li> <li>• PCT 3176</li> </ul> <p>CPHR suggest that a site visit may be the most efficient approach to resolve the PCT selection within the project area.</p> <p><b>Recommendations:</b></p> <p>9. Provide justification on the selection of the best-fit PCT for the project, based on floristic plot data and relevant edaphic factors, including reference to surrounding intact vegetation where site condition is degraded.</p> <p>10. If this matter cannot be resolved via the additional detail provided, arrange a site visit with CPHR to verify PCT selection.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Biodiversity Issue 6</b>	<b>Comments</b>
Microbat Surveys	<p>Section 3.2.4 of the BDAR identifies the presence of exposed sandstone and rocky boulders surrounding the project area. These features can provide potential roosting habitat for cave-dwelling microbats, including species such as the large-eared pied bat. However, Table 18 of the BDAR states that habitat constraints for cave-dwelling microbats are absent, including those for the large-eared pied bat, which can roost in small crevices.</p>

	<p>Given the survey effort for microbats only included deployment of a single Anabat Swift detector, further justification should be provided on the adequacy of the surveys for both habitat constraints within 100m of the project area and targeted surveys for the presence of resident microbats.</p> <p><b>Recommendations:</b></p> <ol style="list-style-type: none"> <li>11. Provide detailed justification for the adequacy of microbat survey effort, including how the assessment has addressed potential roost habitat associated with rocky features.</li> <li>12. Where necessary, undertake additional targeted surveys to confirm the presence or absence of resident microbat species and appropriately assess habitat constraints.</li> </ol>
<i>Timing</i>	<i>Pre-determination</i>

<b>Biodiversity Issue 7</b>	<b>Comments</b>
Mitigation for detected threatened fauna	<p>Surveys within the project area have detected both the powerful owl and southern myotis and assumed presence for the barking owl.</p> <p>Given the project will involve the removal of hollow-bearing trees and clear potential foraging habitat, additional specific measures should be proposed to minimise and mitigate impacts to these species during both the construction and operational phase of the project.</p> <p><b>Recommendation:</b></p> <ol style="list-style-type: none"> <li>13. Provide additional specific mitigation measures for the powerful owl, southern myotis and barking owl.</li> </ol>
<i>Timing</i>	<i>Pre-determination</i>

**Attachment 2: CPHR Marine Coast Estuary and Flood comments - SSD-85869467**

<b>Flood Issue 1</b>	<b>Comments</b>
The FIRA incorrectly states that most of the development is low hazard H1 in the PMF with no requirements	<p>The mapping provided with the FIRA indicates hazards from H3 to H6 around buildings and on existing roads in the PMF.</p> <p><b>Recommendation:</b></p> <p>14. Hazards on internal roads and around buildings should be reduced to low hazard by design which considers management of overland flows through the site and on roadways. Maps are to be updated together with conclusions in the report.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Flood Issue 2</b>	<b>Comments</b>
The FIRA appears to rely on future drainage to manage events up to the PMF event	<p>The FIRA has provided recommendations for drainage design in section 3.1. This design requires very large inlet capacity and culvert capacity to manage flows. It has not been demonstrated that these are achievable therefore the design floor levels in the document cannot be relied upon.</p> <p><b>Recommendation:</b></p> <p>15. Internal drainage in particular large culverts which cross the major flow paths must be designed and modelled as part of the FIRA, blockage analysis must be included in the model to ensure that impacts of blockage on existing and new roadways are taken into account and floor levels/basement ramp levels can be designed with appropriate protection.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Flood Issue 3</b>	<b>Comments</b>
Flood impacts are not acceptable	<p><u>Description of issue</u></p> <p>The FIRA indicates that flood impacts offsite are limited to minor impacts however impacts around existing buildings and on existing roads are shown to be as high as 500mm. The existing buildings are proposed to remain in place, and it is essential that the development does not increase flood risk to existing residents.</p> <p><b>Recommendation</b></p> <p>16. Flood mitigation is required to ensure that no additional risk occurs to existing residents or roadways on site.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Flood Issue 4</b>	<b>Comments</b>
<i>The FIRA has not considered the impacts of near term on long term climate change</i>	<p>ARR 4.2 recommended that rainfall data be upscaled to take account of existing climate change. Use of unscaled rainfall data underestimates flood risk. A development of this scale should also consider the impacts of longer-term climate change to ensure that the development has adequate levels of protection from flooding.</p> <p><b>Recommendation</b></p> <p>17. Design flood levels should be updated to include near term climate change. Design for longer term climate change in accordance with the draft Natural Hazards SEPP guidelines should be considered.</p>
<i>Timing</i>	<i>Pre-determination</i>

<b>Flood Issue 5</b>	<b>Comments</b>
<p>The development proposes shelter in place as the only emergency management strategy</p>	<p>The ability to shelter in place is important for sensitive developments to avoid disruption of elderly residents however the risk of secondary emergencies such as the need for medical assistance still needs to be considered. Stages 1,2 and 5 appear to have access only via Lantana Road which is H5 hazard in a 1% event and H5/H6 in a PMF.</p> <p><b>Recommendation:</b>  18. The FIRA needs to address the risk of isolation in a flood event by demonstrating an alternative safe access route or showing that isolation will occur for very limited time and onsite medical assistance is available.</p>
<p><i>Timing</i></p>	<p><i>Pre-determination</i></p>