



Your ref: SSD-89584717
Our ref: DOC26/327373-21

Ms Tia Mills
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Ms Mills

Subject: Environmental Impact Statement – Lottie Stewart Hospital Seniors Housing (City of Parramatta) (SSD-89584717)

Thank you for your Major Projects Portal request dated 5 June 2026 seeking advice from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the State significant development (SSD) application for Lottie Stewart Hospital Seniors Housing (City of Parramatta) (SSD-89584717).

CPHR has reviewed the Environmental Impact Statement (EIS) and the relevant accompanying technical reports in accordance with the Secretary's Environmental Assessment Requirements (SEARs) dated 13 August 2025.

The project is for the redevelopment of the former Lottie Stewart Hospital, for the purpose of a seniors housing development at 40 Stewart Street, Ermington. The proposal includes the construction and adaptive reuse of existing buildings for six independent living unit buildings and a range of low-rise detached villas and duplex villas, delivering 218 seniors living units.

We consider that the EIS meets the Secretary's requirements for biodiversity, contingent on the applicant addressing issues 1 to 3 identified in **Attachment 1**. Detailed comments and recommendations regarding these issues are identified in **Attachment 1**. Advice on SAI Entities is provided in **Attachment 2**.

If you have any questions regarding advice on biodiversity matters, please contact the Planning Coordination and Advice team at pca@dcceew.nsw.gov.au.

Yours sincerely

Stacy Warren
Senior Manager, Planning Co-ordination and Advice
Conservation Programs, Heritage and Regulation Group (CPHR)

19 June 2026

Enclosure:

Attachment 1 - CPHR Comments – Lottie Stewart Hospital Seniors Housing (City of Parramatta) (SSD-89584717)

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Key Assessment Issues

CPHR provides the following comments on the proposed development

Biodiversity

1.	<i>BDAR not submitted in accordance with Section 6.15 of the Biodiversity Conservation Act 2016 (BC Act)</i>	Under Section 6.15 of the Biodiversity Conservation Act 2016, a certified BDAR must be submitted to the consent authority within 14 days of the Accredited Assessor's certification date. The BDAR is certified and dated 9 March 2026. The EIS was officially lodged on 29 May 2026, 81 days after the BDAR certification date, and therefore outside the 14 day statutory window. As the current certification is no longer valid, the Accredited Assessor is required to re-certify the BDAR. The re-certified BDAR, including finalised biodiversity credit reports, must then be submitted to the consent authority within 14 days of the new certification date. Recommended action: <i>The BDAR must be re-certified by the Accredited Assessor. The re-certified BDAR, with finalised biodiversity credit reports appended, must be submitted to the consent authority within 14 days of the new certification date, to be addressed during the Response to Submissions (RTS).</i>
	<i>Extent and Timing</i>	<i>Response to Submissions</i>

2.	<i>BDAR does not include a table showing the change in vegetation integrity scores as required by BAM Table 27</i>	Table 27 of the BAM requires a table showing the change in vegetation integrity (VI) score for each vegetation zone as a result of identified direct impacts. While the BDAR clearly states the pre-impact VI score (8.6) and the area of native vegetation to be cleared (0.02 ha), it does not present a formal table comparing pre- and post-impact VI scores for the affected vegetation zone, as required. Recommended action: <i>Update the BDAR to include a table showing the pre- and post-impact vegetation integrity scores for each affected vegetation zone, in accordance with Table 27 of the BAM.</i>
	<i>Extent and Timing</i>	<i>Response to Submissions</i>

3.	<i>BAM-C credit report not provided within BDAR</i>	Section 10 of the BDAR states that “a biodiversity credit report is provided on the following pages to formally demonstrate that no offset obligation is generated for this project.” However, no BAM-C credit report appears on the pages that follow, nor in any appendix of the BDAR. The BAM-C credit report is entirely absent from the document. The BAM-C credit report is a mandatory deliverable under Table 27 of the BAM, regardless of whether a biodiversity offset obligation arises. It provides the formal, auditable record of the BAM-C inputs, outputs, and credit calculations underpinning the no-offset conclusion. Its absence means the assessment cannot be independently verified
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		against the BAM-C development assessment case referenced in the BDAR. Recommended action: <i>The finalised BAM-C credit report must be extracted from the BAM-Calculator and appended to the BDAR. The revised BDAR, including the appended credit report, must be re-submitted to the consent authority with a fresh certification date in accordance with Issue 1 above.</i>
	<i>Extent and Timing</i>	<i>Response to Submissions</i>

Attachment 2 – Serious and Irreversible Impacts – Advice on SAI Entities

SAI Entity: Blue Gum High Forest in the Sydney Basin Bioregion

	Steps	CPHR Recommendation
1	Identify relevant entities at risk of SAI	The accredited assessor has correctly identified Blue Gum High Forest in the Sydney Basin Bioregion (PCT 3136) as the sole SAI entity for the purposes of this assessment. This community is listed as a Critically Endangered Ecological Community (CEEC) under both the BC Act and the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). The vegetation integrity (VI) score of 8.6 was determined via the BAM Calculator using a quantitative plot methodology in accordance with BAM Section 4.3.4. No additional SAI entities have been identified by CPHR through review of BioNet, the Threatened Biodiversity Data Collection (TBDC), or relevant TSSC listing advice. CPHR is satisfied with the sufficiency of the BAM assessment methodology applied for this entity. In summary; • Blue Gum High Forest in the Sydney Basin Bioregion (PCT 3136) has been assessed by the proponent in accordance with BAM 2020. • No additional SAI entities beyond those assessed by the proponent have been identified through CPHR review of BioNet or the TBDC. • BioNet records for the subject land and assessment area have been reviewed and do not identify any additional threatened ecological communities or species populations requiring SAI assessment. • The TSSC final determination for Blue Gum High Forest (2006) and the relevant EPBC Act conservation advice have been considered in forming this assessment. CPHR has not identified any material issues with the BAM assessment approach applied for this entity. The quantitative vegetation integrity methodology and species assessment are considered appropriate for the site context.
2	Evaluation of the current extinction risk of the impacted entities	Blue Gum High Forest in the Sydney Basin Bioregion is one of the most threatened ecological communities in NSW. The following extinction risk factors are relevant, having regard to the criteria set out in the SAI guidance document: 1. Rapid and ongoing rate of decline: more than 99% of the original extent of Blue Gum High Forest in the Sydney Basin Bioregion has been cleared. The BioNet Vegetation Classification database records a percent cleared value of 99% for PCT 3136. The

	Steps	CPHR Recommendation
		community continues to decline due to fragmentation, urban development pressure, weed invasion, and edge effects. 2. Very small remaining extent: the total area of Blue Gum High Forest remaining in a non-degraded or semi-intact condition is extremely small across its range. The community on the subject land is in a planted, heavily degraded condition with a VI score of 8.6. 3. Very limited geographic distribution: the community is restricted to the Cumberland Plain and surrounding areas of the Sydney Basin Bioregion, with a highly fragmented and disjunct distribution across a small number of remnant and planted patches. 4. Limited management responsiveness: given the extent of historical clearing and fragmentation, the community is considered at risk of irreversible decline without active conservation intervention. However, individual remnant patches in higher-condition states can respond to targeted management. CPHR has had regard to the TSSC final determination for Blue Gum High Forest (2006), the relevant EPBC Act conservation advice, and the NSW BC Act listing advice in forming this evaluation. These sources confirm that Blue Gum High Forest in the Sydney Basin Bioregion satisfies the SAIL principles relating to rapid rate of decline and very limited geographic distribution. CPHR considers the accredited assessor has appropriately evaluated the current extinction risk of Blue Gum High Forest. The low VI score (8.6), small patch size (less than 1 ha on the subject land), and planted origin of the vegetation are consistent with the highly degraded and fragmented condition of this community across its range.
3	Detail measures taken to avoid impacts on the entity	The proponent has implemented the following measures to avoid and minimise impacts on Blue Gum High Forest (PCT 3136): • The development footprint has been designed to minimise clearing, with approximately 0.07 ha of PCT 3136 retained within the development site through modifications to building layout and siting. • Tree clusters have been preferentially retained over isolated individuals to maintain habitat connectivity and structural integrity. • A Construction Environmental Management Plan (CEMP) is proposed that includes pre-clearance vegetation protection fencing, pre-clearance flora and fauna inspections, weed

	Steps	CPHR Recommendation
		management, dust suppression, and edge effect mitigation measures. CPHR considers the avoidance and minimisation measures proposed are appropriate and reasonable given the site constraints and the heavily degraded, planted condition of the affected vegetation. No additional avoidance or minimisation measures are considered necessary by CPHR.
4	Evaluate the impacts from the proposal	The proposal will result in the direct clearing of 0.02 ha of Blue Gum High Forest in the Sydney Basin Bioregion (PCT 3136) in a planted condition, with a vegetation integrity score of 8.6. The affected vegetation is located within a fragmented, predominantly urban landscape on the former Lottie Stewart Hospital site. The community on the subject land does not meet the EPBC Act listing thresholds for the community (patch area less than 1 ha, canopy cover less than 10%, not within a patch greater than 5 ha). An additional 0.07 ha of PCT 3136 will be retained within the development site. CPHR considers that the loss of 0.02 ha of low-condition, planted Blue Gum High Forest is unlikely to increase the extinction risk of this community at a landscape scale. Key factors informing this assessment include: the planted and heavily degraded origin of the affected vegetation; the very low VI score (8.6), which is below the CEEC BAM-C offsetting threshold of 15; the extremely small area of impact relative to the total remaining extent of the community; the retention of 0.07 ha of PCT 3136 on site; the absence of threatened species of concern within the direct impact area; and the highly modified, urban context of the surrounding landscape.
5	Provide advice on whether the proposal is likely or unlikely to result in SAI	CPHR recommends that the impacts on Blue Gum High Forest in the Sydney Basin Bioregion are unlikely to constitute a serious and irreversible impact (SAI). This recommendation is based on the planted and heavily degraded condition of the affected vegetation, the very small area of direct impact, the retention of PCT 3136 on site, the absence of SAI-risk threatened species within the impact area, the appropriateness of the avoidance and minimisation measures, and the highly modified landscape context.
Other Recommendations/Comments		
1	CPHR recommends that the consent authority require the CEMP to include specific provisions for the protection of retained Blue Gum High Forest vegetation (PCT 3136) on site during construction, including installation of vegetation protection fencing prior to any works, pre-clearance inspections by a suitably qualified ecologist, and post-construction monitoring of retained vegetation condition to confirm the effectiveness of protective measures.	