



Your ref: SSD-90243456
Our ref: DOC25/664224

Annabel Turner
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

29 August 2025

Subject: Request for Secretary's Environmental Assessment Requirements (SEARs) for 2-10 Valentine Avenue, Parramatta (SSD-90243456) and Concurrent Rezoning

Dear Annabel,

Thank you for your email received on 7 August 2025, requesting input on SEARs for the above State Significant Development (SSD) and concurrent rezoning from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water.

CPHR has reviewed the Scoping Report (Urbis, 1 August 2025) 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.

Flood risk management assessment requirements

The site is impacted by significant overland flooding as identified in the [Parramatta River Flood Study 2024](#) (Stantec, 13 June 2024). CPHR recommend that the Environmental Impact Statement (EIS) is supported by a Flood Impact and Risk Assessment (FIRA).

Should you have any queries regarding this matter, please contact the Greater Sydney Region Planning Team at rog.qsrplanning@environment.nsw.gov.au.

Yours sincerely,

Louisa Clark
Director Greater Sydney Branch
Regional Delivery
Conservation Programs, Heritage and Regulation Group

CPHR Environmental Assessment Requirements – Valentine Avenue, Parramatta (SSD-90243456) and Concurrent Rezoning

Biodiversity

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), *Biodiversity Conservation Regulation 2017* (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:
 - 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 Accreditation Scheme for the Application of the *Biodiversity Assessment Method Order 2017* under s6.10 of the BC Act.

Water and Soils

6. 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.
 - Wetlands.
 - Groundwater.
 - Groundwater dependent ecosystems.
 - Proposed intake and discharge locations.
7. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
 - Existing surface and groundwater.
 - Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
8. 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).

Flood Risk Management

9. 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 a high level of expertise in flood risk management in NSW. As a minimum the FIRA must:
- Consider the NSW Flood Prone Land Policy.
 - Address the relevant provisions of the [NSW Flood Risk Management Manual](#) (2023) and [toolkit](#), and existing Council flood mapping, planning controls, government studies, information and requirements.
 - Identify and describe existing flood behaviour, constraints and risk on the site and its surrounding areas for the full range of events, including the 20% Annual Exceedance Probability (AEP), 5% AEP, 1% AEP, 0.5% AEP or 0.2% AEP floods and Probable Maximum Flood (PMF), as well as the 1% AEP flood and PMF under climate change. The hydrological and hydraulic models developed by the consultant must be generally compatible with the Parramatta River Flood Study 2024 and be upgraded to the latest Australian Rainfall and Runoff methodologies. The consultant should verify their models against this study for the full range of flooding.
 - Assess climate change impacts on flood behaviour in accordance with [Flood Risk Management Guideline FB01 Understanding and managing flood risk](#).
 - 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 20%, 5%, 1%, and 0.5% or 0.2% AEP floods and PMF, as well as the 1% AEP flood and PMF under climate change.
 - Identify and describe the flood constraints on the land (floodways, flood storage, flood hazard and emergency response issues) for the full range of abovementioned events, for both mainstream flooding and local overland flooding.
 - Identify the impacts of the development on flood behaviour and risk for the abovementioned flood events.
 - Assess the appropriateness of the development or development types for the location based on the flood constraints on the land.
 - Ensure that the rezoning is commensurate with flood behaviour.
 - Address consistency of the emergency response strategy with the existing NSW State Emergency Service strategy.
 - Address flood-related emergency response issues and site access arrangements without relying on a Flood Emergency Response Plan to inform the development assessment, and in accordance with [Flood Risk Management Guideline EM01 Support for Emergency Management Planning](#), including locating carparks above ground, where sheltering in place is proposed.
 - If sheltering in place is proposed, assess consistency with the [Shelter-in-Place guideline for flash flooding](#) and provide details on structural adequacy.
 - 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.
 - Demonstrate that the rezoning would not cause a significantly increased requirement for government spending on emergency management services, flood mitigation and emergency response measures.

Note:

Flood modelling is to be undertaken by suitably qualified engineers 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.

End of Submission