



Your ref: SSD-82709458
Our ref: DOC25/684561

Adela Murimba
Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2124

1 October 2025

Subject: Request for advice on Environmental Impact Statement – Residential development with in-fill affordable housing – 19 – 25 Balfour Street, Lindfield (SSD-82709458) (Ku-ring-gai Council)

Dear Adela,

Thank you for your referral received 15 August 2025 seeking comments from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water regarding the Response to Submissions for the above State significant development application.

CPHR has reviewed the *Environmental Impact Statement* (prepared by Keylan Consulting, July 2025) (EIS) and supporting studies and provides detailed flood and biodiversity comments at **Attachment A**.

In summary:

- The Flood Letter (Appendix 25) by SMART Structures Australia (14 July 2025) refers to the Middle Harbour Southern Catchment which is not relevant to the site. The site lies within the Lane Cove Southern Catchments and as flood data is currently unavailable, CPHR recommends the proponent consults with Ku-ring-gai Council regarding potential flood assessment requirements.
- CPHR recommends that conditions of consent incorporate mitigation measures from Appendix 24 Biodiversity Development Assessment Report (BDAR) (ACS Environmental, 2 June 2025) and Appendix 23 Arboricultural Impact Appraisal and Method Statement (Naturally Trees, 9 April 2025) of the EIS. This is to ensure appropriate measures are incorporated to avoid impacts to the existing Sydney Turpentine-Ironbark Forest (STIF), forming part of the critically endangered ecological community (CEEC) in Ku-ring-gai.

Should you have any queries regarding this matter, please contact Rithy Ang, Senior Conservation Planning Officer via rithy.ang@dcceew.nsw.gov.au.

Yours sincerely

Louisa Clark

**Director
Regional Delivery - Greater Sydney Branch
Conservation Programs, Heritage and Regulation Group**

CPHR comments on EIS - Residential development with in-fill affordable housing – 19 – 25 Balfour Street, Lindfield (SSD-82709458).

Documents Reviewed

CPHR has reviewed the following documents and provides comments below:

- *Environmental Impact Statement – 19-25 Balfour Street, Lindfield* (Mecone, April 2025) (EIS)
- Appendix 8 – Architectural Plans (Giles Tribe, 9 April 2025)
- Appendix 23 – Arboricultural Impact Appraisal and Method Statement (Naturally Trees, 9 April 2025)
- Appendix 25 – Flood Risk Commentary Letter (Smart Structures Australia, 14 July 2025)
- Appendix 24 – Biodiversity Development Assessment Report (ACS Environmental Pty Ltd, 2 June 2025).
- Appendix 30 – Landscape Plan (Studio IZ, 26 May 2025)
- Appendix 31 – Vegetation Management Plan (ACS Environmental Pty Ltd, 7 May 2025)

Flooding

Key Assessment Issues

1.	No flood information is available for the subject site.	The Flood Letter prepared by SMART Structures Australia, dated 14 July 2025 is not considered relevant to the assessment of the subject site. The letter refers to the Middle Harbour Southern Catchment Flood Study and Council's online flood mapping to conclude that the site is not impacted by flooding. The site is not located within the Middle Harbour Southern Catchment, but instead, is within the Lane Cove Southern Catchments. A flood study for the Lane Cove Southern Catchments is currently being undertaken by Ku-ring-gai Council and therefore, flood information for the subject site is currently not available on Council's online maps. For areas with no flood information, Council may require the proponent to undertake a flood assessment. CPHR recommends the proponent consults with Ku-ring-gai Council in this regard. Recommended action • The proponent consults with Ku-ring-gai Council to determine whether a flood assessment is required for the subject site. Following Council's advice, the existing Flood Letter is to be reviewed and updated accordingly to reflect any updated requirements or flood assessment.
	<i>Extent and Timing</i>	Prior to determination.

Biodiversity

2.	BDAR prepared by ACS Environmental - Section 4.3.8 and Section 4.3.9 Arboricultural Impact Appraisal	The BDAR prepared by ACS Environmental Pty Ltd, dated 2 June 2025 includes recommended mitigation measures to ensure: • The replanting of Sydney Turpentine Ironbark Forest (STIF) tree species that form part of a critically endangered ecological community (CEEC).
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	and Method Statement prepared by Naturally Trees.	• The implementation of a vegetation management plan (VMP) to support avoiding impacts to the CEEC STIF. The Arboricultural Assessment prepared by Naturally Trees, dated 9 April 2025 also identifies and recommends the retention of several trees within the subject site. Recommended action Conditions of consent to incorporate the following: ○ The Landscape requires that 80% of species used in replanting are species typical of the STIF ecological community. ○ A VMP is prepared and implemented. ○ Tree protection and Arborist certification measures specified in the Arboricultural Assessment Report. ○ An Arborist must be present during demolition and construction stage to avoid impacts to retained trees.
	<i>Extent and Timing</i>	Recommended conditions of consent

End of Submission