



Your ref: SSD-86274959  
Our ref: DOC25/886498

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

30 October 2025

**Subject: Request for advice on Environmental Impact Statement – TOD - 30-34 Sir Joseph Banks Street, Bankstown (SSD-86274959)**

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Dear Thomas,

Thank you for your referral received 16 October 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 above State significant development application.

CPHR has reviewed the *Environmental Impact Statement: TOD - 30-34 Sir Joseph Banks Street, Bankstown - (SSD-86274959)* (FPD Planning, 30 September 2025) and relevant supporting technical reports and provides biodiversity comments at Attachment A.

Regarding flood risk management, CPHR considers that *30-34 Sir Joseph Banks Street, Bankstown, NSW 2200 - Flood Impact and Risk Assessment* (BG&E, September 2025) adequately addresses the Secretary's Environmental Assessment Requirements and relevant planning controls for the proposed development. Therefore, no additional flooding information is required.

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

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

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

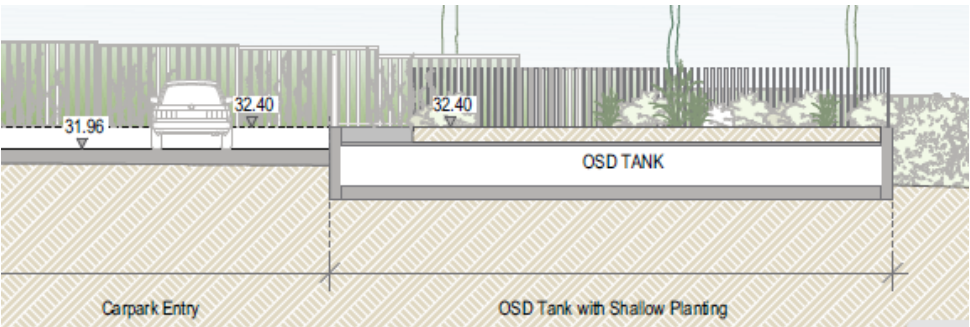
**CPHR comments on EIS – TOD – 30-34 Sir Joseph Banks Street, Bankstown (SSD-86274959)**

CPHR has reviewed the following documents and provides its comments below:

- *Environmental Impact Statement: TOD - 30-34 Sir Joseph Banks Street, Bankstown - (SSD-86274959)* (FPD Planning, 30 September 2025)
- Appendix G – Landscape Plans (DKO, 9 September 2025)
- Appendix F – Architectural Plans (DKO, 2 September 2025)
- Appendix H - Arboricultural Impact Assessment Report (Arterra, 28 July 2025) (AIA)
- Appendix J – Stormwater Management Plan (BG&E, 8 September 2025)
- Appendix O – Biodiversity Development Assessment Report (AMBS Ecology and Heritage, September 2025) (BDAR).

**Biodiversity**

Key assessment issues

<p>1.</p>	<p>Adequacy of the AIA</p>	<p>The AIA states that the on-site stormwater detention (OSD) and driveway will be constructed at or above existing ground levels. However, the Landscape Section 2/2 Plan (dwg DA-LA06, revision B) (excerpt below) indicates that both the OSD tank and driveway will require varying degrees of excavation into the existing ground and therefore has potential impacts to Tree 38 and Tree 40.</p>  <p><b>Recommended actions:</b></p> <ul style="list-style-type: none"> <li>• Provide a Longitudinal Plan clearly showing the relationship between the driveway, OSD and existing ground levels.</li> <li>• Further assess potential impacts to Tree 38 and Tree 40.</li> <li>• Provide an updated AIA demonstrating how Trees 38 and 40 will be viably retained, including the provision of more detailed specifications on how this will be achieved.</li> <li>• Include a new section in the AIA titled 'Tree Protection Specifications', clearly outlining tree and site-specific protection measures in accordance with Sections 1.3.21 and 2.2.6 of Australian Standard 4970–2025. Generic measures are not acceptable.</li> <li>• Relevant plans are to be updated in consultation with the consulting arborist as required to ensure the viable retention of the subject trees.</li> </ul>
	<p><i>Extent and Timing</i></p>	<p>Prior to determination.</p>

2.	BDAR – access to digital files	<p>No digital files relevant for the BDAR have been provided, as required under the Biodiversity Assessment Method (BAM).</p> <p><b>Recommended actions:</b></p> <ul style="list-style-type: none"> <li>• The BAM assessor is to submit the BDAR case to the consent authority (Greater Sydney – Compliance &amp; Regulation) via Biodiversity Offsets and Agreement Management System (BOAMS).</li> <li>• All required digital files are to be uploaded to the case in BOAMS.</li> <li>• Refer to Appendix L – Table 28 of the BAM for the list of digital files that must be provided.</li> </ul>
	<i>Extent and Timing</i>	Prior to determination

**End of Submission**