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Your Reference
SSD-83258708

Our Reference
703103419-007

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Florida Street, Sylvania, Affordable Housing — Response to Submission

9 April 2026

Dear Alexander,

Reference is made to the proposed development at 29 Florida Street, Sylvania, which is currently progressing under SSD-83258708 and is at the *Response to Submissions* phase.

In response to submissions received, we have prepared an updated Flood Impact and Risk Assessment, addressing the comments and requirements raised by the relevant authorities. These comments were provided by the Department of Planning, Housing and Infrastructure (DPHI), the Department of Climate Change, Energy, the Environment and Water – Conservation Programs, Heritage and Regulation (CPHR), NSW State Emergency Service (SES) and Sutherland Shire Council.

A comprehensive response to each authority comment has been compiled and is presented in the table below. The responses outline how the matters raised have been considered and addressed within the updated assessment.

This correspondence is to be read in conjunction with the Flood Impact and Risk Assessment Report, Revision D, dated 02 April 2026, which has been updated accordingly to reflect the outcomes of the review process.

Please do not hesitate to contact the undersigned should any further clarification or information be required.

1.1 Response to Department of Planning, Housing and Infrastructure (DPHI) Comments

No.	Issue raised	Response
3. Stormwater and flooding		
3.1	The proposed increase in on-site flooding hazards resulting from the development during both the 1% AEP event and Probable Maximum Flood event is contrary to the Department's 2023 <i>Flood Risk Management Manual</i> and clause 20 of <i>Sutherland Shire Local Environmental Plan 2025</i> and is not supported. The following must be addressed: a) detail the changes to the on-site flood behaviour separately from the off-site changes and provide details of proposed flood mitigation works to ensure the existing hazards are not increased b) provide plans (or update existing plans) demonstrating the finished floor levels of habitable areas, entries, basement crests, and any other openings are protected and located above the relevant flood planning levels for the site (inclusive of any required freeboard).	There is deliberate design consideration for on-site management of flows. The development seeks to reduce the overall hazard exposure of people and property through both consolidation and direction of through site overland flow paths. Detailed landscape design will contribute to this aim when completed at the detailed design stage. Flood protection afforded to the proposed development is documented in the FIRA, highlighted in Section 6, which outlines measures that assist in mitigating flood risk.
3.2	The comments raised by the of the Department of Climate Change, Energy, the Environment and Water - Conservation Programs, Heritage and Regulation Group (CHPR) and NSW State Emergency Service on their preference for shelter in place (SIP) as the preferred evacuation strategy must be addressed. Where a SIP strategy is proposed, address the considerations included in the Department's 2024 <i>Shelter in Place Guideline for Flash Flooding</i>.	Noted. Updates to the FIRA, Table 6.3, outline and discuss the Shelter-in-place guidelines.
3.3	In consultation with Council: a) update the proposed stormwater design to meet Council's requirements for connections into its drainage network b) provide evidence of Council's support for the proposed relocation and reconstruction of its trunk drainage system, including any concept design.	The proposed realignment of the drainage pipe will maintain the upstream and downstream connection points. Council are consulted through the design process and will/can approve the development based on their review of the design.

1.2 Response to Agency Advice

No.	Issue raised	Response
1. Department of Climate Change, Energy, the Environment and Water, Conservation Programs, Heritage and Regulation (CPHR)		
1.1	Flood Risk Assessment The site is partially affected, and the proposed landform modifications increase flood depths on internal roads, as identified in the <i>Gwawley Bay Catchment Floodplain Risk Management Study and Plan</i> (FLOODMIT Pty Ltd, 2015). The Flood Impact Risk Assessment (FIRA) (Mott Macdonald Pty Ltd, Revision C, 5 December 2025) is therefore required to demonstrate appropriate management of flood risk and safe evacuation.	A site-wide strategy for the reduction of flood exposure to people and property was integral to the design process. On-site flood afflux does not need to be mitigated to the same effect as off-site flood impacts. Some consolidation of flood flows is considered beneficial in a) increasing amenity through reduced flood extent, b) assisting people with the identification of unsafe areas in the event of severe storms.
1.2	Onsite flood risk management The FIRA demonstrates that offsite impacts have been limited by the design of the onsite storage and internal roads within the site however this has resulted in high hazard flooding in an internal courtyard and on the internal roads. The FIRA has not shown how the residents of the development and their visitors would be protected from the risks posed by the high hazard flooding on the internal roads and the flood storage in the courtyard. Recommended action: The FIRA to demonstrate how risk to residents will be appropriately managed or amend the design to mitigate those risks.	Updates to the FIRA Flood Emergency Management section 6.3, to address how people are to be separated from on-site hazards. Note that detailed landscape design is yet to be complete (detailed design stage), flood emergency response is designed for people to not be exposed to on-site hazard.
1.3	Evacuation strategy - The site currently has good low hazard access from Florida Street however the proposed on site mitigation measures create a high hazard on internal roads which isolates part of the site from the evacuation route. - The FIRA indicates that the primary evacuation strategy is evacuation of the site prior to a flood event under the direction of the NSW State Emergency Services (SES). The site is in a flash flood area without flood warning. It is considered unlikely that the SES will direct residents to evacuate. - Shelter in place (SIP) is considered by CPHR to be the preferred primary evacuation strategy. This requires the FIRA to address the considerations included in the Shelter in place guideline for flash flooding (Department of Planning, Housing and Infrastructure, 2024). - The internal roadways isolate part of the site from evacuation or assistance due to H3 to H5 hazards which occur for storms as frequent as the 5% AEP event. The hazards on the internal roadways do not comply with the Sutherland Shire Development Control Plan 2015 (DCP)	Concerns noted relating to the speed of storm onset->flood onset. SIP is a valid strategy and localised overland flows are managed via grading of the precinct to allow people to achieve safe refuge. Considerations of the SIP guideline to be added into FIRA Section 6.3 With the SIP as primary response strategy there is no need for vehicles to exit the development during flooding. The worst-case flooding depicted in these FIRA maps relate to very short-lived flooding conditions, so concerns relating to access must be considered in light of this.

	requirement to provide reliable pedestrian and vehicle access and exceed the shelter in place considerations. The FIRA does not consider the duration of isolation. Recommended actions: - Review the evacuation strategy with respect to available flood warnings. - If SIP is the preferred strategy demonstrate consistency with the DPHI guideline. - Provide alternate access unless hazards on internal roadways can be reduced. Refer to SES for consideration.	
1.4	Flood planning levels - The FIRA notes flood planning levels however it is unclear how these are met at the entry points to the proposed buildings. Access to the basements are from roads which experience deep flooding. No details have been provided regarding how basement ramps, ventilation and other openings are protected to the Probable Maximum Flood level. - Recommendations are made in section 6.1 of the FIRA however it is unclear if these recommendations are reflected in the architectural and landscaping design. Recommended actions: - Provide a site plan and table demonstrating flood planning levels and design floor/ramp levels at each point of entry to the buildings and basements. In areas proposed to be cut in below adjacent landscaping clearly show how overland flow will be prevented from entering the buildings.	Road design has been documented indicating the flow paths traverse lower portions of the cross section. This is reflected in the flood mapping where flooding follows the road grading. Minimum floor levels and flood protection are assessed from the flooding within flow paths in the vicinity. See section 6.1 and Map 18 of the FIRA. This will be tabulated in next revision. We will continue to assess flood risk on site as we undergo coordinated detailed design with wider discipline team.
1.5	Proposed relocation of Council pipework A council stormwater pipe is to be relocated from an area of excavation for a proposed basement. Limited detail is included in the stormwater management plan and there is no evidence of discussion with Sutherland Council officers with respect to the requirements for the pipe relocation. Recommended action: Demonstrate that relocation of the pipe is acceptable to Sutherland Shire Council.	The proposed realignment of the drainage pipe will maintain the upstream and downstream connections. Discussions have commenced with Council in relation to the civil infrastructure. Council review the submission and will make their requirements known.
1.6	Landscaping plans revised after IWMP was completed The IWMP and FIRA predate the latest revision of the landscape plans and are based on a previous version of the plans. Recommended action:	Noted. The IWMP has been updated to reflect the latest layouts. This has been coordinated with the latest landscape plans, issued 27.03.26 – Issue G.

	Confirm that IWMP and FIRA are consistent with the latest landscape plans dated 10 November 2025.	
1.7	Inadequate representation of changed flood behaviour The ground levels on the site are proposed to be changed by significant amounts. The afflux mapping therefore does not reflect changes in flood behaviour, such as flood depths. The changes in top water level do not show the significant changes in water depth within the site due to the levelled site. The afflux maps are therefore useful only for assessing changes in flood level offsite. Recommended action: Detail changes to the onsite flood behaviour separately from the offsite changes. The FIRA must address the methods of managing the risk associated with deep flooding within the internal roads.	Flood depth increases may be required as part of holistic flood risk management considering the wider site and potential for flood exposure. The depth of flooding in an internal road is not necessarily something to avoid if there are associated benefits, especially considering SIP and short duration of peak flood hazard.

2. State Emergency Services (SES)

2.1	The proposed design increases flood hazard within the site posing a risk to life to site users. By including the proposed mitigation measure of “the channelisation of overland flows within the Site to the internal roadway”⁴ the hazard within the site itself is increased in all flood events from the 20% AEP flood,⁵ with flooding within the site during the PMF increasing from H2 to H5.6	Hazard footprints are significantly reduced from existing conditions through provision of new structures raised above PMF levels of the adjacent flow paths. The peak flood hazards mentioned here are located in the centre of the new design road – a deliberate flow path which draws water away from the structures. SIP provisions made for people to achieve safety.
2.2	The proposal has not demonstrated consistency with the Shelter-in-Place Guideline (NSW Government, 2024). The consent authority should request the proponent to demonstrate consistency with the Shelter-in-Place Guideline prior to granting consent, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing consideration: 8c. development is not subject to high hazard flooding or surrounding roadways are not subject to high hazard flooding.	The high hazard shown within the internal road is within a deliberate flow path and doesn't represent a hazard to structures. The SIP considerations have been listed within the current revision of the FIRA with the risk discussion that is appropriate, section 6.3.
2.3	Recommend DPHI/consent authority includes the requirements for all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF) or 1% AEP plus freeboard, whichever is higher as a condition of consent. If this is not feasible reconsider basement carparking as any openings to the basement are below the PMF will pose risk to life and property.	Note Map 18 demonstrates this, within FIRA, to tabulate these sampling locations for entries. During detailed design, this should be reconfirmed after any potential design changes. All proposed basement and building entries are currently above either the governing PMF and/or 1% AEP + freeboard flood planning level.

1.3 Response to Sutherland Council Comments

No.	Issue raised	Response
11. Engineering requirements		
11.2	Stormwater Management - The proposed connection from the private drainage system into Councils Drainage network at the intersection of Pembroke Street and Florida Street is not supported. OSD 3 & 4 must connect into Council drainage network within the subject property. - The stormwater run-off from No. 92 & 94 Princes Highway & No.27 Florida Street must be addressed at Stage 1 of the proposal. - The proposed reconstruction of Councils Trunk drainage system must be approved by Councils Stormwater & Waterways team. - The required reconstructed sections of Council's Trunk drainage system must be designed/consent by Council. - Required changes to the associated easement must be undertaken in accordance with Councils Drainage Easement Policy - Drainage-Easements-Policy-ADOPTED-JUNE-2025.pdf. Basement levels will need to consider ground water. A referral will need to be sent to WaterNSW to consider ground water.	Noted. The plans have been updated to suit the connection of OSD 3 and 4 to the drainage network within the subject property. During future detailed design, Homes NSW and Council will work together on the proposed realignment of the drainage pipe. Council has provided design input, and the design requirements can be accommodated at the detailed design stage.
11.3	Flooding The following matters are required to be addressed: Basement crests are to be individually assessed and provided where required. The crest must achieve the minimum 500mm freeboard. The increase in flood hazard at the intersection of Pembroke Street and the Private Road rating to H5 hazard is not acceptable. Flood mitigation works is required to ensure that the existing rating is not increased.	FIRA revision includes the Map 18, 1% AEP Flood Planning Levels. All proposed basement and building entries are currently above either the governing PMF and/or 1% AEP + freeboard flood planning level. Council's road reserve in Pembroke remains as H1, H2 – with the H5 being located along the steeper private road (as the overland flow travels down towards the ponding that is in Pembroke). The flow path in the centre of private road has a higher hazard class, to the benefit of the flood extent and consolidation of overland flow to achieve flood protection to structures.



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