

11 December 2025

Najeeb Kobeissi
Senior Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150

Dear Najeeb,

Re: Forest Lodge Integrated Seniors Living (SSD-75493483) – Response to Submissions

In accordance with the Department’s Request for Additional Information dated 2 October 2025, this letter is provided to address the key issues and comments raised by the Department, City of Sydney and the agency advice received in response to the Environmental Impact Statement for SSD-75493483.

Response to the Department of Department of Climate Change, Energy, the Environment and Water

The submissions made by DCCEEW are italicised and in grey, while the responses are directly below the submissions they relate to:

<p>Flood Risk Assessment</p>	<p><i>Issue: The Flood Impact Assessment (BG&E, Version A, June 2025) has not adequately addressed the appropriateness of the development for the site. The SEARs have not been complied with as the flood risks on site have not been properly identified. The proposal is inconsistent with: Section 3.1(a) of City of Sydney’s Interim Floodplain Management Policy (2014) as the development is not compatible with the flood hazard of the land</i></p> <p>Response:</p> <ul style="list-style-type: none">• The Johnstons Creek Catchment Floodplain Risk Management Study (2015) identifies this site as a flood storage area in all events, excluding the PMF. While the report identifies the site as a floodway under a PMF event, the adopted velocity*depth product value to define floodway across the entire catchment is not representative of the true nature of runoff at the site. Upon review of PMF results, peak flow velocities in the site are generally below 0.5 m/s, with flood depths exceeding 4m. Bridge Road, located to the north of the site, detains upstream runoff and reinforces the site's storage, not conveyance, function.• The design of the proposed development is consistent with City of Sydney’s Interim Floodplain Management Policy as it has considered the flood hazard of the land (flood storage) and provided flood mitigation measures to offset impacts and reduce vulnerability of residents and proposed buildings’ structural soundness as following:<ul style="list-style-type: none">- Provision of flood storage volume underneath the building in the form of an under-croft car park to allow runoff to be temporarily stored in case of major flood events- Finished floor levels of habitable rooms in ground floor have been set above the 1 in 500 AEP level (in excess of 1% AEP plus 500mm freeboard)- Residential age care area’s FFL are set above the PMF level- Flood flow velocities are considered low (less than 0.5 m/s)
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	<ul style="list-style-type: none"> - Building materials and foundations are engineered for prevailing hydrostatic and buoyancy forces. In addition, the building will be built using flood compatible materials - Due to the nature of flooding occurring in the site (flash flooding) a shelter-in-place approach is recommended considering the catchment has a fast hydrological response and there will be little to no warning to safely evacuate externally. As the site would be a managed facility 24/7 any residents on ground flood will be assisted in case of internal evacuation should be required. Internal evacuation to higher levels is possible via internal stairs/lifts.. - There is approximately a 4.9% chance that a 1 in 1000 AEP event will occur at least once in a 50-year period (the design life of the building). This likelihood is considered very low, and as mentioned previously, should this occur, residents will be able to shelter in higher levels in accordance with the provisions of the shelter-in-place guidelines.
<p>Flood Risk Assessment</p>	<p><i>Issue: Clause 5.21 (Flood Planning) of Sydney Local Environmental Plan (LEP) 2012, as the development is not compatible with the flood function and behaviour on the land and would adversely affect the safe occupation and efficient evacuation of people in the event of a flood</i></p> <p>Response: As mentioned in the previous comment, the Johnstons Creek Catchment Floodplain Risk Management Study (2015) identifies this site as a flood storage area in all flood events. The proposed develop complies with Clause 5.21 (Flood Planning) of Sydney Local Environmental Plan (LEP) 2012 as following:</p> <ul style="list-style-type: none"> • Flood risk to life has been minimised by providing elevated finished floor levels above 1 in 500 AEP event (higher than a 1% AEP plus 500mm freeboard as per City of Sydney’s Interim Floodplain Management Policy (2014)). Residential age care’s finished floor level is set above the PMF for safe occupation of residents • Flood storage in the form of open under-croft car park has been provided to prevent displacement of floodwaters into adjacent land • Due to the flash-flooding nature of the site, a shelter-in-place approach during a flood is recommended. While residents will be able to evacuate, should they wish via Junction Street and Bridge Road in events of equal or lesser magnitude than a 1 in 500 AEP event, it is recommended that a shelter-in-place approach be adopted, as flood risk on Junction Street and Bridge Road would be unsafe for pedestrians and motorists. • As a shelter-in-place approach is proposed, this will not exceed the capacity of existing evacuation routes • Levels 1 and above provide sufficient facilities, amenities and services to cater for the occupants during the flood event • The proposed development does not adversely increase existing flood affectation on adjacent buildings or land • The proposed development will not adversely affect the environment or cause erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses. The proposed development does not encroach into the existing flow path at Larkin Street. • The design of the proposed development has considered the risk of flooding to the risk. Ingress and egress to permanent and temporary occupants will be able to do so via Junction Street, which remains trafficable in flood events up to the 1 in 500 AEP flood event. It is highly unlikely that a resident

	<p>or visitor will be at Larkin Street during a major storm that results in flooding due to the flash flooding nature of the catchment.</p>
<p>Flood Risk Assessment</p>	<p><i>The NSW Flood Impact and Risk Assessment, Flood Risk management guideline LU01 Issue:</i></p> <p>Response: The BG&E (Version A, June 2025) report has addressed the requirements of LU01 guidelines as following:</p> <ul style="list-style-type: none"> • Described the proposed development • Undertaken existing and post-development flood modelling and analysis for a range of design flood events (from minor to major and extreme) in order to understand flood risk for the site • Mapped and discussed potential impact on adjacent land • Incorporated flood mitigation measures to eliminate or minimise impacts. These measures are: <ul style="list-style-type: none"> - Provision of flood storage, in the form of an under-croft car park, to avoid displacement of flood water during moderate and rare flood events - Designed finished floor levels in accordance with City of Sydney’s Interim Floodplain Management Policy - Propose a shelter-in-place approach to manage flood risk to residents and temporary occupants in case of a flood. - The proposed site would provide sufficient amenities and services to cater for safely sheltering people in case of a flood - The choice of ARR version is consistent with current local government study. This ensures the impacts assessed and proposed controls are consistent with Council’s Study and practices. The outcome of a preliminary assessment of the ARR2019 v4.2 IFD compared to ARR187 IFD has indicated that habitable floor levels would not change based on the adoption of the updated version of the ARR. This assessment is discussed in detail in the third response to City of Sydney’s submission. - The effects of climate change on the proposed development have been considered in the analysis and are discussed in the Flood Impact and Risk Assessment report. • The results of the flood impact and risk assessment provide sufficient information to inform planning authorities for the development proportionate with flood behaviour and the associated risks • Provide information on key flood characteristics at the site, as well as ingress and egress points and adjacent roads • Identify the potential for any significant adverse impacts to the existing community (via afflux maps, flood hazard maps) as a result of the proposed development. • The proposal has demonstrated that can manage flood risks associated with a PMF event

Response to the City of Sydney

The submissions made by CoS are italicised and in grey, while the responses are directly below the submissions they relate to:

<p>Flooding</p>	<p><i>The City identifies the site as highly affected by flooding, with risks associated with both minor and major storm events. Larkin Street, in particular, is a sag point acting as a detention basin, with flood depths exceeding 2m in more frequent 20% AEP events and up to 8m in the PMF</i></p> <p>Response: While the rear of the site (Larkin Street) is affected by flooding in minor and major storm events, the design of the proposed development eliminates the risk of exposing residents and visitors to flood hazard in the following manner:</p> <ul style="list-style-type: none"> • Pedestrian and vehicular ingress and egress to the development is provided at Junction Street, in addition to Larkin Street. In the event that Larkin Street becomes flooded, residents would be able to access or egress the site via Junction Street. • Junction Street is subject to H1 flood hazard in flood events equal or lesser magnitude than a 1 in 500 AEP event. • Habitable floor levels are set above the 1% AEP plus 500 mm (freeboard).
<p>Flooding</p>	<p><i>The submitted Flood Impact Assessment fails to adopt the updated 2019 version of the Australian Rainfall and Runoff Guidelines.</i></p> <p>Response: The flood risk and impact assessment was carried out utilising the flood model that City of Sydney Council has adopted (and provided) for defining flood behaviour and planning levels within the Johnstons Creek Catchment Floodplain Risk Management Study and Plan (2015). This study adopted ARR1987 guidelines, which were current at the time. The use of this model ensures consistency with Council's current flood planning framework and aligns with the approach adopted for other developments in the area. While the ARR2019 guidelines have since superseded ARR1987, it is important to note that studies based on ARR1987 remain valid, particularly when they form part of Council-endorsed floodplain risk management strategies. We understand that Council is progressively updating its flood studies to reflect ARR2019 methodologies, and that the Johnstons Creek catchment is scheduled for review between 2028 and 2030, as indicated on Council's website. Should preliminary ARR2019 mapping for this catchment become available, we would welcome the opportunity to undertake a comparative assessment. The outcome of a preliminary assessment of the ARR2019 v4.2 IFD compared to ARR187 IFD has indicated that the outcome of the design would not change. This assessment is discussed in detail in the following response to City of Sydney's submission.</p>
<p>Flooding</p>	<p><i>The Department in their assessment must be satisfied that any final flood modelling and reporting has addressed the updated 2019 version of these guidelines and the NSW Flood Risk Management Manual, accompanying toolkits and NSW Shelter-in-place guidelines.</i></p> <p>Response: A preliminary Intensity-Frequency-Duration design rainfall comparison has been carried out between ARR1987 and ARR2019 v4.2. The</p>

	<p>results indicate that the ARR1987 1% AEP rainfall would become 2% AEP rainfall under ARR2019 v4.2, and ARR1987 0.2% AEP rainfall would become in ARR2019 v4.2 0.5% AEP rainfall. FFL of habitable floor levels is set at 15.9mAHD, which is 1.5m higher than the ARR1987 0.2% AEP level (equivalent to 0.5% AEP under ARR2019 v4.2). The FFL of the under-croft car park is set at 13.1mAHD, which is 0.14m above the stipulated 5% AEP level (12.96mAHD) under ARR1987 conditions. The 2% AEP event under ARR1987 would be equivalent to a 5% AEP under ARR2019 v4.2. The 2% AEP flood level under ARR1987 is 13.4mAHD, which would result in a depth of flooding of 0.3m over the under-croft car park. Under current flood hazard guidelines (AIDR, 2017) 0.3m depth is the limit considered safe for vehicles and people. The FFL of the residential age care area is set at 19.1mAHD, which is 0.6m higher than the Probable Maximum Flood (PMF) level.</p> <p>In accordance with the Johnstons Creek Catchment Floodplain Risk Management Study, shelter-in-place aligns with flood emergency response strategies due to the short duration “flash” flooding of the catchment. There is little warning that can be provided to residents in the catchment. Any warning would be for precautions such as temporary refuge onsite. The report indicates that the short duration of flooding does not allow for sufficient time to evacuate residents from their properties. As such, evacuation is generally not recommended as the response during a flood may likely be hurried and uncoordinated under these circumstances, and it may expose residents to hazardous conditions. Shelter-in-place would be adequate as:</p> <ul style="list-style-type: none"> • The floor level of the shelter-in-place part of the development is above PMF. • The structural soundness for conditions in a PMF event would be verified by a qualified structural engineer. • Access to shelter-in-place does not rely on electricity, is self-directing and would have signage for all people on site • Protects residents from weather • Access to personal hygiene facilities (e.g. toilets) • A minimum of 2m² per person is provided • Self-sufficiency items would be stored above the PMF. These include drinking water and food for occupants
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Response to NSW SES

The submissions made by CoS are italicised and in grey, while the responses are directly below the submissions they relate to:

Flooding	<p><i>In summary, we recommend the Department of Planning, Housing and Infrastructure (DPHI):</i></p> <ul style="list-style-type: none"> • <i>Seeks clarification of inconsistencies in the Flood Impact Assessment, including revision of the statement “An H3 hazard level indicates conditions that are unsafe for vehicles, children, and the elderly, with flood depths exceeding 3 metres in some areas and flow velocities surpassing 2 m/s.”</i>
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	<p>1 This depth and velocity of flooding is classified as Hazard Level 6 (H6).</p> <p>2 This level of hazard is unsafe for people and vehicles with all building types considered vulnerable to failure. This is further detailed below in Attachment A, Principle 2.</p> <p>Principle 2 Decisions should be informed by understanding the full range of risks to the community.</p> <p>Response:</p> <ul style="list-style-type: none"> • The flood hazard mapping has been reviewed and updated as part of the RtS to reflect AIDR flood hazard categorisation. In summary: PMF flood hazard at the site is H6 due to peak flood depths exceeding 4m. • Flood hazard in a 1% AEP event at the rear of the site (Larkin Street) is H5. Junction Street is subject to H1 flood hazard, which is key to pedestrians and vehicles. H1 is safe for pedestrians and vehicles. • Flood hazard in a 5% AEP event at the rear of the site (Larkin Street) ranges from H3 to H5. • Junction Street is subject to H1 flood hazard in a 5% and 1% AEP event, which is deemed safe for pedestrians and vehicles in case of ingress or egress requirement to the site <p>An updated version of the FIRA has been prepared to clarify mapping inconsistencies.</p>
<p>Flooding</p>	<p><i>we recommend the Department of Planning, Housing and Infrastructure (DPHI): carefully considers the risks associated with placing more people within the floodplain at this location. The 2022 Flood Inquiry advocates for a planned retreat from areas at most risk on the floodplain. The proposal to intensify development in this area is essentially an advance into the floodplain. This will increase vulnerability by introducing more people in a high flood risk area.</i></p> <p>Response:</p> <p>Details about the flood risk are included in BG&E report to inform DPHI's decision making process and additional information in this response.</p> <p>As mentioned in previous responses, the site, while being shown flood affected in mapping figures, should be interpreted as indicated in the BG&E report. Proposed finished floor levels, ingress and egress points are located sufficiently high to prevent flood waters from entering the site. Vehicular and pedestrian trafficability via Junction Street to residents and visitors is considered safe during large flood events (up to 1 in 500 AEP). In the unlikely case of a PMF event (approximate probability of 1 in 10,000,000 chance) residents will not be able to evacuate the site. As such, shelter-in-place is proposed. It is considered that the benefits that the proposed residential and age care facility outweigh the existing flood risk that the site is subject to and appropriate flood mitigation measures have been put in place to eliminate and reduce the exposure of residents and temporary occupants to the site.</p>

Flooding

As noted in comments by the NSW State Emergency Service (NSW SES) and the City of Sydney, the submitted Flood Impact Statement (FIS) contains inconsistencies and does not adopt the updated 2019 version of the Australian Rainfall and Runoff Guidelines.

Response:

The reader is directed to Response 2 of the City of Sydney submission for clarification.

Yours sincerely,



Ivan Varga

BG&E

Associate – Flooding and Hydrology