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By email: jude.urbanik@dpie.nsw.gov.au

19 December 2025

**Subject: EIS Advice - Beauchamp Road, Hillsdale, Affordable Housing (SSD-83256478)
(Bayside)**

Dear Jude,

Thank you for your email dated 9 December 2025 seeking advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the State Significant Development Application (SSD- 83256478) located at 68-80 Beauchamp Road, Hillsdale.

CPHR has reviewed the *Environmental Impact Statement* (FPD Planning Pty Ltd, dated 28 November 2025) (EIS) and accompanying documentation and provides its comments and recommendations below and at **Attachment A**:

Flood Risk Assessment

The *Flood Impact Risk Assessment* ((FIRA) prepared by Mott Macdonald Pty Ltd, Issue B, dated 4 November 2025) does not demonstrate that the flood risk and associated impacts for the proposed development have been adequately mitigated.

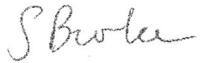
The development proposes a substantial increase in population at risk within an area impacted by the 1% Annual Exceedance Probability (AEP) flood and more frequent floods. A floodway passes through the site in a 1% AEP flood and the whole of the site becomes a floodway in the probable maximum flood (PMF) event.

Biodiversity

The development is consistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 27 November 2025. Please note, if the proposed development is changed so that it is no longer as described in Schedule 1 of the determination, the applicant will need to lodge a new BDAR waiver request or prepare a BDAR.

If you have any questions about this advice, please do not hesitate to contact Khatera Tokhi Senior Conservation Planning Officer, via khatera.tokhi@dcceew.nsw.gov.au.

Yours sincerely,



Sarah Burke
A/Director, Greater Sydney
Regional Delivery – Greater Sydney Branch
Conservation Programs, Heritage and Regulation Group

CPHR response to EIS Advice - Beauchamp Road, Hillsdale, Affordable Housing (SSD-83256478) (Bayside)

In preparing this advice CPHR has reviewed the following documents:

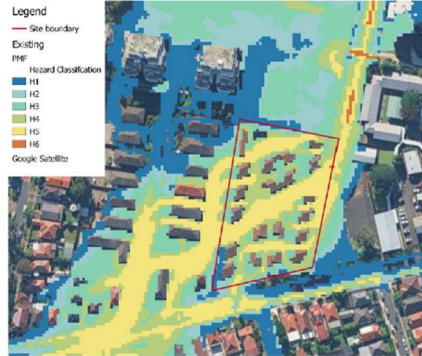
- *Environmental Impact Statement* prepared by (FPD Planning Pty Ltd, dated 28 November 2025) (EIS)
- Appendix O - *Flood Impact and Risk Assessment* prepared by (Mott Macdonald Pty Ltd, Revision B, dated 4 November 2025) (FIRA)
- [Birds Gully and Bunnerong Road Catchment Flood Study prepared by \(WMA Water Pty Ltd, Revision 1, dated 15 February 2018\)](#)
- Appendix N-*Integrated Water Management Plan* prepared by (Mott Macdonald Pty Ltd, Revision B, dated 7 November 2025) (IWMP) and
- Appendix E-*Architectural plans* prepared by (Studio SC Pty Ltd, Revision A, dated 22 October 2025).

Flood risk assessment

Key Assessment Issues:

1.	<i>Disclaimers on the FIRA and IWMP do not permit use by any party other than the applicant</i>	<p>CPHR relies on the adequacy of supplied reports to carry out assessment of the flood related SEARs. Disclaimers that do not allow another party to rely on the advice mean that it is not possible for CPHR to determine if the SEARs are met.</p> <p>Recommendation action:</p> <p>Reports prepared in support of a development must be sufficiently robust for a determining authority to rely on the information provided. For flood risk assessment the reports are used to determine appropriate flood planning levels, offsite impacts and risk posed from and to the development. The consultant should ensure that sufficient investigations are undertaken, and the reports provided for the express purpose of determination of the project. Reports should be updated to include adequate assessment and remove inappropriate disclaimers.</p>
	<i>Extent and Timing</i>	Pre-determination
2.	<i>The proposal includes intensification of development in a floodway and poses increased risk to life</i>	<p>The subject site includes an area which acts as a floodway in the 1% AEP event (see below). The entire site becomes a high hazard floodway in the PMF event. The proposed management of the floodway by concentrating flows to a designated floodway between the two buildings has increased the risk on site.</p> <p>Risk is a combination of hazard and exposure. The proposal increases hazard on site due to the proposed concentration of the onsite floodway and significantly increases risk due to the increased numbers of residents who will be exposed to the hazard.</p>

Figure 5.4: PMF Design Storm Flood Hazard



Recommendation action:

The proposed intensification of development on this site should be reconsidered unless it can be redesigned to manage risk to life.

Extent and Timing

Pre-determination

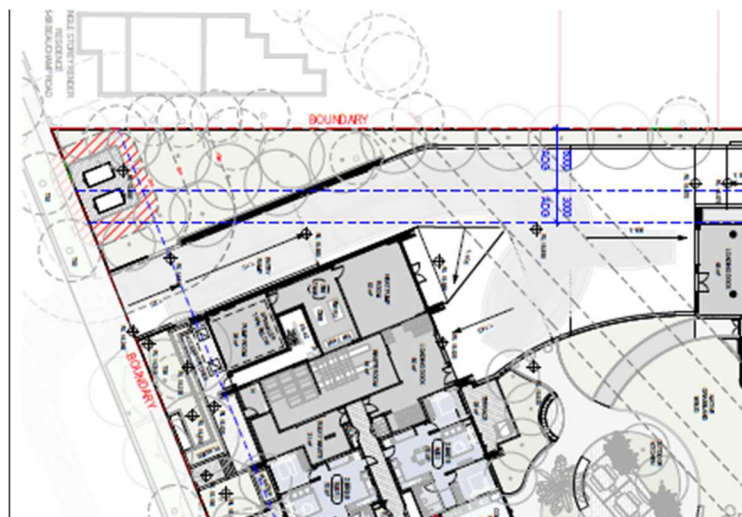
3. *The design of the development includes a large bridge over the flow path which is not consistent with Sydney Water's advice*

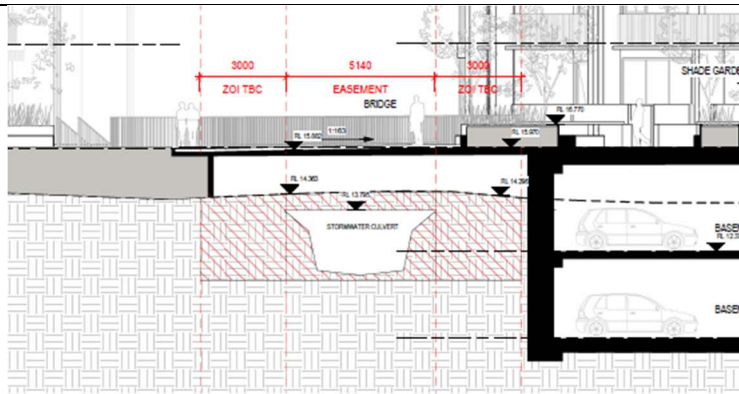
Car access to the rear building and the proposed basement is proposed to be across a bridge built over the easement. The bridge is not described in the FIRA and is only evident in the architectural plans (see below). It is not known if the bridge has been modelled in accordance with the details shown on the architectural plans.

The extent of the bridge appears to be inconsistent with the advice from Sydney Water and will have implications on the ability for Sydney Water to access and maintain the stormwater easement.

The bridge is shown as impacted by flooding in the 1% AEP event and is H5 hazard in a PMF event. The bridge poses a significant risk if used by residents during a flood event.

The pedestrian bridge over the easement is not described in the FIRA and the flood immunity of this access is not able to be determined from the supplied information.






Recommendation actions:

- Confirmation from Sydney Water is required to verify whether the bridge location and design area acceptable.
- Confirmation is required on how the bridge was incorporated in the flood modelling including the approach used to model potential blockage of the bridge opening.
- Reconsider the bridge levels to reduce the risk of inundation. Additional safety measures are required to ensure cars are not washed off the bridge during a flood event.
- Provide pedestrian access above the PMF level to the rear building.

4. <i>Extent and Timing</i>	Pre-determination
<p><i>Afflux mapping does not provide adequate details of offsite impacts. Impacts on and off site are not adequately mitigated.</i></p>	<p>The development proposes to move diffuse flows through the site to a concentrated floodway between the buildings. This area becomes a high hazard floodway and increases risk to life particularly for the rear building.</p> <p>The flood impact mapping has pooled all impacts greater than 0.1mm which suggests less impact than occurs. The impacts have been listed in the text for some locations and exceed 100mm. Offsite impacts of up to 170mm for 80 metres outside the site boundary are noted. The afflux mapping for the 1% event shows that the extent of flooding is increased on the adjacent site (was dry now wet category) which is not acceptable. Offsite impacts should be limited to negligible impacts of the order of 10mm.</p> <p>Impact of an increase in flood level in the floodway between the buildings of 450mm in the 1% AEP event with total depths of up to 1m in the floodway makes this area unsafe. In the PMF event increases of up to 0.78m are stated in the FIRA. The proposed floodway management on site significantly increase the risk on site and isolates the rear building.</p> <p>Recommendation action:</p> <ul style="list-style-type: none"> • Update afflux mapping to correctly reflect impacts. • Additional mitigation is required to ensure that adverse impacts do not extend beyond the site boundary. • Redesign the proposed high hazard floodway between the buildings to reduce flood depths and hazards in this location.

	<i>Extent and Timing</i>	Pre-determination
5.	<i>Architectural drawings show the high hazard floodway as active landscaping which poses risk to life</i>	<p>The architectural plans show (see below) that the proposed floodway will be used for active landscaping and recreation for the occupants of the development. The floodway will carry water in most stormwater events and will become high hazard without warning. The floodway would require fencing to prevent entry and to prevent people being washed under the proposed bridge. Use of active landscaping is not compatible with the floodway function.</p>  <p>Recommended action:</p> <p>Fencing will be required around the floodway to prevent entry and active recreation areas will need to be located outside of the floodway.</p>
	<i>Extent and Timing</i>	Pre-determination
6.	<i>The development proposes significant increase in population in an area which cannot evacuate</i>	<p>Shelter in place is proposed due to the rapid onset of flooding and flooding on roadways serving this location.</p> <p>A site-specific emergency plan is recommended in the FIRA. Site specific emergency plans should not be used as a justification for increased development density. Secondary risks such as medical emergencies, fire and residents driving through flood waters to return home cannot be managed by shelter in place strategies.</p> <p>There is no modelling to demonstrate likely time of isolation on site and consistency with the recommendations of the <i>Shelter in Place for Flash Flooding guideline</i> (DPHI 2025) has not been demonstrated.</p> <p>The rear building is further isolated by the high hazard floodway which has been proposed between the two buildings, and this poses an additional risk on the site.</p> <p>The location is not considered suitable for shelter in place due to the high hazard floodway through the site. The FIRA has not demonstrated that risk can adequately mitigated. Presence of a basement on this site increases the potential for the development to be damaged during a flood and still require evacuation after a flood.</p> <p>The FIRA also states that H3 and H4 hazards are low hazard. This is incorrect. H3 and H4 are considered unsafe for people and vehicles. The site is also subject to H5 hazards in rare events which poses a risk to structures. The FIRA states that hazard is not increased because of the development, however it has not demonstrated that the hazard is acceptable.</p> <p>Recommendation action:</p> <ul style="list-style-type: none"> • DPHI to assess the implications of permitting increased population in an area where shelter in place is the only viable evacuation strategy.

		<ul style="list-style-type: none"> • Refer the proposed development to NSW State Emergency Services (SES) for consideration. • Demonstrate compliance with all of the recommendations in DPHI Shelter-in-Place guideline for flash flooding • Provide to the PMF level alternative access to the rear building.
	<i>Extent and Timing</i>	Pre-determination
7.	<p><i>The FIRA has not been prepared in accordance with the requirements of Flood Risk Management Guideline LU01 Flood impact and risk assessment.</i></p>	<p>The FIRA has provided details on flood behaviour for the 1% AEP and PMF events only. The guidance in LU01 requires modelling for the full range of flood events. A significant increase in risk occurs between the 1% AEP and the PMF therefore events between the 1% AEP and PMF should be included. More frequent events are also required to demonstrate how often the site, and its access routes will be impacted by flooding.</p> <p>The FIRA states that only 2mm increase in flood level occurs for the 1% AEP under climate change scenarios. This appears to be lower than would be expected in this location and no climate change mapping of the developed site has been provided to justify this claim.</p> <p>Recommendation action:</p> <ul style="list-style-type: none"> • Update the FIRA to address the requirements of LU01. Modelling to include smaller and larger floods and the impact of climate change. • Management of the risk to occupants and visitors posed by the increased population on site and the changes in the flow path must form part of the FIRA.

End of Submission