

Our Ref: ID 3615  
Your Ref: SSD-78996460

27 January 2026

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Dear Jasmine,

**RTS State Significant Development Application for Residential Development with infill affordable housing, 16-24 Lord Street & 21-27 Roseville Avenue, Roseville SSD-78996460**

Thank you for the opportunity to provide advice on the State Significant Development Application (SSDA) for residential development with infill affordable housing, 16-24 Lord Street & 21-27 Roseville Avenue, Roseville. It is understood that the amended SSDA seeks development consent for:<sup>1</sup>

- Demolition of existing buildings, structures and trees.
- Excavation & construction of a 3-level basement.
- Construction of a residential flat building up to 9-storeys in height (RL120.45m) to provide 252 apartments including affordable housing, residential amenities and services.
- Provision of 344 car parking spaces at basement level and bicycle parking.
- Provision of hard and soft landscaping.
- Associated works for the provision of infrastructure and servicing.

We note the Applicant has made changes to the design, compared to the previously exhibited project, to address matters raised in the submissions and stakeholder/agency consultation, including:<sup>2</sup>

- A 1.1m reduction of the proposed maximum building height from 31.2m to 30.1m, to generally comply with the maximum permissible building height.
- A one storey reduction to the podium of Building A (Roseville Avenue / Martin Lane northeastern corner) from five to four storeys.
- A reduction in the total number of apartments from 259 to 252 dwellings.
- The previously proposed **flood wall** to the eastern site boundary has been removed and all residential apartments have been raised to achieve the flood planning level plus freeboard. This has resulted in the deletion of dwellings fronting Roseville Avenue positioned below footpath level.

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<sup>1</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 3

<sup>2</sup> Urbis. 2025. Response to Submissions SSD-78996460, page 8

- Introduce direct street access to the ground floor townhouses along Roseville Avenue to provide a greater sense of street address and activation.
- Increase the overall deep soil area provision from 23% to 30% of the site area, including providing additional soft landscaping around the central courtyard tree.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami in NSW. This role includes planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

We recommend that flooding issues are considered in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the [Flood Risk Management Manual 2023](#) (the Manual) and supporting guidelines, including the [Support for Emergency Management Planning](#) and relevant planning circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including 4.1 Flooding and PS24-001.

**We refer to our previous communication dated 04 June 2025, with reference ID3069.**

In summary, we note that the site is within the **overland floodway** extent.<sup>3 4</sup> The northeastern part of the site is affected by shallow overland flooding as frequently as 50% Annual Exceedance Probability (AEP) events,<sup>5</sup> with the northeastern part of the site experiencing flood depths up to 1.8 metres<sup>6</sup> and peaking at H5 flood hazard level in a Probable Maximum Flood (PMF) event.<sup>7</sup> However, we note that the western and most of the southern parts of the site appear to be outside the PMF extent.<sup>8 9</sup> As further detailed in Appendix A of this document, in a PMF event (89.1 m AHD),<sup>10</sup> flooding encroaches into the proposed dwellings inundating habitable floor levels (Ground Floor at 88.6 m AHD) and the non-habitable Lower Ground (LG) level at 85.4 m AHD,<sup>11</sup> in the northeastern part of the site at Building A.<sup>12</sup> However, we note the proposed building design provides 500mm freeboard above the 0.2% AEP event for **habitable spaces**.<sup>13 14</sup>

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<sup>3</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 35

<sup>4</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-30

<sup>5</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Depth 50% AEP

<sup>6</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 29

<sup>7</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

<sup>8</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Depth PMF

<sup>9</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Figure 24, page 29

<sup>10</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Figure 28, page 34

<sup>11</sup> Fender Katsalidis. 2025. Architectural Design Statement Addendum, page 6

<sup>12</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 29

<sup>13</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 26 & 32

<sup>14</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Level 0.2% AEP

We also note vehicle access to the site is proposed via a single driveway to the basement located on Lord Street,<sup>15</sup> which is located outside the PMF extent,<sup>16</sup> suggesting that rising road access may be available for the site **west**, via Lord Street, High Street and then onto the Pacific Highway.<sup>17</sup> However, access **east**, towards Martin Lane and north onto Roseville Avenue is affected by high hazard (H5 – H6) flooding in a PMF event.<sup>18</sup>

Based on our review of the updated information, we provide the following additional advice:

- **Note** and **support** the approach of not having any entry and exit along Martin Lane,<sup>19</sup> where the flood hazard peaks at H5 - H6 in a PMF event,<sup>20</sup> and **recommend** access onto Roseville Avenue is also avoided as the **high hazard flooding (H5)** poses a significant risk to life. Further, we **advise against** directing people to evacuate onto Roseville Avenue, as stated in the FIRA,<sup>21</sup> and recommend this is updated to remove the statements referring to *evacuation towards Roseville Avenue during major flood events*.<sup>22</sup>
- **Recommend ensuring** that site and buildings design provides safe access for all buildings (including the flood-affected Building A) to Lord Street to minimise risk to life from flooding and secondary emergencies. The analysis of the impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand the evacuation constraints.
- **Advise** the FIRA should adequately address existing and post-development conditions, in accordance with the NSW Government Guidelines<sup>23</sup> in order to understand the full extent of the flood risk to life and property associated with this development. We recommend the proponent should provide an updated FIRA to **include** and **demonstrate** the following:
  - what flood warning triggers will be implemented, **noting** “*The critical storm event duration was determined to be a 30-minute storm event. This is a short duration that would not typically allow adequate response time*”,<sup>24</sup>
  - how evacuation of the flood affected areas of the site is achievable within the available timeframe and using the available infrastructure;
  - time to peak and duration of inundation;
  - flood mapping with an appropriate flood depth map legend;
  - site-specific flood hazard mapping for events beyond the 1% AEP and up to and including the PMF event.

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<sup>15</sup> Urbis. 2025. Environmental Impact Statement, page 78

<sup>16</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 20

<sup>17</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>18</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

<sup>19</sup> TC Consultants. 2025. Flood Impact and Risk Assessment Report, page 30

<sup>20</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

<sup>21</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>22</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>23</sup> DPE. 2023. LU01 Flood Risk Management Guideline: Flood Risk and Impact Assessment

<sup>24</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 31

- Should sheltering in place be proposed for this site, the consent authority requests 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 (but not limited to):
  - detailed assessment of evacuation off-site (the primary emergency management strategy) to determine that evacuation off-site is not achievable. (7)
  - flash flooding is the only flood risk present at the site, whether it be from overland flooding, local creek or riverine flooding, (8a)
  - the flooding occurs within less than 6 hours from the commencement of causative rain and the duration of shelter in place due to isolation by floodwaters is less than 12 hours from the commencement of rainfall, (8b)
  - the development is not subject to high hazard flooding (e.g. floodways, high hazard H5 or H6 areas) or surrounding roadways are not subject to high hazard flooding. (8c)
  - how shelter in place will be used as part of the site's emergency management response, including actions before, during and after sheltering in place, (9a)
  - an understanding of the secondary risks and how the proponent proposes they will be managed is outlined in the FIRA. (10)
- **Recommend** consulting with the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour, noting the increase in afflux of greater than 50mm in areas within the site (to the east of the building).<sup>25</sup>

You may also find the following Guidelines on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Ana Chitu via email at [rra@ses.nsw.gov.au](mailto:rra@ses.nsw.gov.au) should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,



Peter Cinque  
Senior Manager, Emergency Risk Management  
**NSW State Emergency Service**

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<sup>25</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 22

## **ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>26</sup>**

### **Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.**

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan<sup>27</sup> and the Hornsby Ku-Ring-Gai Flood Emergency Sub Plan,<sup>28</sup> where evacuation is the preferred emergency management strategy for people impacted by flooding.

### **Principle 2 Decisions should be informed by understanding the full range of risks to the community.**

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

We note the design has been amended to remove all previously proposed subterranean apartments in Building A facing Roseville Avenue.<sup>29</sup> The lower ground floor (GF) town houses have been redesigned as single level apartments with the area below, situated below the Flood Planning Level (FPL), being converted to non-habitable floorspace,<sup>30</sup> and there has been an expansion of residential gym and reconfiguration of amenities to replace the removed apartments.<sup>31</sup>

It is noted that the site is within the **overland floodway extent**.<sup>32 33</sup> The northeastern part of the site is affected by shallow overland flooding as frequently as 50% Annual Exceedance Probability (AEP) events.<sup>34</sup> Flooding progressively encroaches onto the site, with part of the northeastern lot inundated by floodwaters peaking at H4 hazard level in a 1% AEP event.<sup>35</sup> In a Probable Maximum Flood (PMF) event the site experiences peak flood depths up to 1.8 metres<sup>36</sup> and peaking at H5 flood hazard level.<sup>37</sup> However, we note that the western and most

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<sup>26</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>27</sup> NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

<sup>28</sup> NSW SES. 2021. Hornsby Ku-Ring-Gai Flood Emergency Sub Plan. Section 1.6.2, page 7

<sup>29</sup> Urbis. 2025. Response to Submissions SSD-78996460, page 77

<sup>30</sup> Urbis. 2025. Response to Submissions SSD-78996460, Figure 4, page 32

<sup>31</sup> Urbis. 2025. Response to Submissions SSD-78996460, page 32

<sup>32</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 35

<sup>33</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-30

<sup>34</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Depth 50% AEP

<sup>35</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Depth 1% AEP

<sup>36</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 29

<sup>37</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

of the southern parts of the site appear to be flood-free up to and including the PMF event.<sup>38</sup>

<sup>39</sup>

According to the Flood Impact and Risk Assessment (FIRA), the PMF flood level is 89.1 m AHD,<sup>40</sup> which exceeds the habitable floor level (Ground Floor) of 88.6 m AHD of Building A and the non-habitable Lower Ground (LG) level at 85.4 m AHD,<sup>41</sup> with flood encroaching into the proposed dwellings inundating habitable floor levels in the northeastern part of the site.<sup>42</sup> However, we note the proposed building design provides 500mm freeboard above the 0.2% AEP event for habitable spaces,<sup>43</sup> with the finished floor level at 88.6m AHD<sup>44</sup> and flood levels at the site around 88.1 m AHD in the 0.2% AEP event.<sup>45</sup>

It is also understood that vehicle access to the site is proposed via a single driveway to the basement located on Lord Street,<sup>46</sup> which is located outside the PMF extent.<sup>47</sup> The FIRA suggests that the site maintains trafficable access **west** via Lord Street, noting the flood depth here is less than 0.15 metres in a PMF event.<sup>48</sup> The Flood Study also shows minor flood affectation and H1 flood hazard level on Lord Street **west** of the site, while flood depths on Lord Street **east** of the site (towards Martin Lane) reach 2.2 metres in a PMF,<sup>49</sup> and the flood hazard level at the Lord Street – Martin Lane intersection reaches H5.<sup>50</sup>

This suggests that rising road access may be available for the site west, via Lord Street, High Street and then onto the Pacific Highway, as proposed in the FIRA.<sup>51</sup> However, the analysis of the impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand the evacuation constraints. In addition, we **note and support** the approach of not proposing any entry and exits along Martin Lane,<sup>52</sup> where the flood hazard peaks at H5 - H6 in a PMF event,<sup>53</sup> making it unsafe for all vehicles and people.<sup>54</sup> We **recommend** access onto Roseville Avenue is also avoided in a flood event, as the Flood Study suggests this road to be impacted, both east and west of the site, by H5 flood hazard level in a PMF event.<sup>55</sup>

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<sup>38</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Figure 24, page 29

<sup>39</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Depth PMF

<sup>40</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Figure 28, page 34

<sup>41</sup> Fender Katsalidis. 2025. Architectural Design Statement Addendum, page 6

<sup>42</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 29

<sup>43</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 26 & 32

<sup>44</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>45</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2, Peak Flood Level 0.2% AEP

<sup>46</sup> Urbis. 2025. Environmental Impact Statement, page 78

<sup>47</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 20

<sup>48</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 18

<sup>49</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 1, Drawing 7-1 and Table 7.2, page 85

<sup>50</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

<sup>51</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>52</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 30

<sup>53</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

<sup>54</sup> Department of Planning and Environment. 2023. Flood risk management guideline FB03, Flood Hazard - Figure 1 General flood hazard vulnerability curve, page 3

<sup>55</sup> BMT. 2023. Middle Harbour Southern Catchments Flood Study. Volume 2 – Design Flood Results, Figure H-27

We therefore **advise against** directing people (those needing to evacuate the flood affected eastern side of the building which experiences over-floor inundation in extreme events) towards Roseville Avenue, as stated in the FIRA.<sup>56</sup> We **recommend ensuring that** site and buildings design provides safe access for all buildings (including the flood-affected Building A) to Lord Street to minimise risk to life from flooding and secondary emergencies. The FIRA should be updated to remove the statements referring to *evacuation towards Roseville Avenue during major flood events*.<sup>57</sup>

We also **recommend** consulting with the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour, noting the increase in afflux of greater than 50mm in areas within the site (to the east of the building).<sup>58</sup>

### **Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.**

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water.

In relation to the proposed emergency management strategy, the FIRA states *“Evacuation of the site should occur in events rarer than the 0.2% AEP flood event. A flood warning system should be implemented that is triggered when rainfall which may lead to a 0.2% flood event occurs.”*<sup>59</sup> However the FIRA also notes that *“The critical storm event duration was determined to be a 30-minute storm event. This is a short duration that would not typically allow adequate response time.”*<sup>60</sup>

We **recommend** the proponent should clarify what flood warning triggers will be implemented and **demonstrate** how evacuation of the flood affected areas of the site is achievable within the available timeframe and using the available infrastructure. For this, the FIRA should be updated to include time to peak and duration of inundation, along with an updated flood depth map legend and site-specific flood hazard mapping for events beyond the 1% AEP and up to and including the PMF event, as these were not included in the current FIRA. Currently, the flood depth map legend has a range of different colours with no actual

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<sup>56</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>57</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>58</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 22

<sup>59</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 32

<sup>60</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 31

depths to match, except for the lowest 0.15 metres and highest 2 metres,<sup>61</sup> and does not include complete flood hazard mapping, which is not appropriate to accurately show the flood risk at the site. We **advise** the FIRA should adequately address existing and post-development conditions, in accordance with the NSW Government Guidelines<sup>62</sup> in order to understand the full extent of the flood risk to life and property associated with this development.

As the site is affected by flash flooding there are no Bureau of Meteorology quantitative flood warnings available, therefore Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall; however, these are not time or flood height specific, and will likely not to provide sufficient time for the community to respond in a flood event.

Further, noting the FIRA states that *shelter in place is also possible*,<sup>63</sup> we recommend the consent authority requests 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 (but not limited to):

- detailed assessment of evacuation off-site (the primary emergency management strategy) to determine that evacuation off-site is not achievable. (7)
- flash flooding is the only flood risk present at the site, whether it be from overland flooding, local creek or riverine flooding, (8a)
- the flooding occurs within less than 6 hours from the commencement of causative rain and the duration of shelter in place due to isolation by floodwaters is less than 12 hours from the commencement of rainfall, (8b)
- the development is not subject to high hazard flooding (e.g. floodways, high hazard H5 or H6 areas) or surrounding roadways are not subject to high hazard flooding. (8c)
- how shelter in place will be used as part of the site's emergency management response, including actions before, during and after sheltering in place, (9a)
- an understanding of the secondary risks and how the proponent proposes they will be managed is outlined in the FIRA. (10)

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

#### **Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.**

Managing flood risks requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

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<sup>61</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, Appendix 2

<sup>62</sup> DPE. 2023. LU01 Flood Risk Management Guideline: Flood Risk and Impact Assessment

<sup>63</sup> PTC Consultants. 2025. Flood Impact and Risk Assessment Report, page 29

- **Isolation** – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- **Secondary risks** – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- **Consideration of human behaviour** – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

**Principle 5 Risks faced by the itinerant population need to be managed.**

Any Emergency Management strategy needs to consider people visiting the area or using a development.

**Principle 6 Recognise the need for effective flood warning and associated limitations.**

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner.

**Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.**

Development within a floodplain will necessitate ongoing involvement from the NSW State Emergency Service (SES) in community awareness, preparedness, and response activities. It is essential that all site users, both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life. This includes:

- Raising awareness of flood risk
- Strengthening community connections
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Importantly, a private flood management plan is insufficient to address flood risks at the site.