



Your ref: SSD-79261463
Our ref: DOC26/99369

Justin Keen
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

26 February 2026

**Subject: CPHR comments on RTS – Residential development with in-fill affordable housing
- Reid Street and Woodside Avenue, Lindfield (SSD-79261463)**

Dear Justin,

Thank you for your referral received 12 February 2026 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group on the Response to Submissions (RTS) for this State significant development (SSD-79261463).

CPHR has reviewed the Submissions Report prepared by Mecone (February 2026) and accompanying technical reports and provides its comments and recommendations at Attachment A.

Should you have any queries regarding this matter, please contact Central Metropolitan team at rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely,

S. Harrison

Susan Harrison
**Senior Team Leader Planning, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR comments on RTS – Residential development with in-fill affordable housing - Reid Street and Woodside Avenue, Lindfield (SSD-79261463)

Flood risk management

CPHR has reviewed the RTS documentation inclusive of the Flood Impact and Risk Assessment (FIRA) prepared by HCE (24 November 2025). The following key assessment issues require further action prior to determination.

Key Assessment Issues

Impact of development on surrounding areas	The FIRA shows significant impacts on Reid Street and Lindfield Avenue. It increases the hazard categories for these public roads exposing the community to significant flood risk. Although the surrounding roads are currently not trafficable in existing condition due to high flood hazard, the proposed development would still increase flood risk to the community by exposing additional people to this flood hazard. New development should not increase flood risk to the community. Recommended Action: The applicant investigates mitigation measures to ensure no increase in flood risk in Reid Street or Lindfield Avenue.
<i>Extent and Timing</i>	Prior determination
Increased risk of flooding in rarer events/emergency management	It is acknowledged that evacuation from the development is not feasible in rarer flood events. However, the Flood Response Strategy (FRS) prepared in Section 9 of the FIRA does not address the emergency management constraints associated with shelter in place. This includes the inundation of ground floor units as the FRS requires residents of the units that would be inundated by rarer flooding to move to upper floors. CPHR highlights that the design of any new development must avoid relying on such a recommendation, particularly in areas subject to short-duration flash flooding which occurs with no warning and can happen at any time of day or night. Recommended Action: - The FIRA must address DPHI's Shelter in Place Guideline. The guideline provides 'ten shelter in place considerations' that must be addressed to help guide the consent authority when assessing if SIP is an appropriate emergency management strategy for this development. This must be undertaken in consultation with the NSW SES and Ku-ring-gai Council. Shelter in place must be associated with appropriate development controls including but not limited to: - habitable levels must be above the Probable Maximum Flood (PMF) level to ensure safe occupation - access level to basement parking must be above the PMF level to ensure the safety of the occupiers and users of the site - building materials should be flood compatible up to the PMF level.
<i>Extent and Timing</i>	Prior determination

Biodiversity

Key Assessment Issues

A BDAR waiver determination was issued on 20 February 2026. Notwithstanding, CPHR also recommends that the landscape design is amended to including more species associated with PCT 3136 or 3262 given that they are the local community. For example, replace *Corymbia maculata* with *Corymbia gummifera*.

End of Submission