Department of Climate Change, Energy, the Environment and Water

Your ref: SSD-78156221
Our ref: DOC26/154809

Nathan Stringer
Principal Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

2 April 2026

**Subject: Request for Advice on Submissions and Amendment Report – Mixed-use development with in-fill affordable housing - Cecil Avenue and Roger Avenue, Castle Hill (SSD-78156221)**

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Dear Nathan,

Thank you for your referral received 25 March 2025 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water on the State Significant Development (SSD-78156221) located at 83-107 Cecil Avenue and 9-10 Roger Avenue, Castle Hill.

CPHR has reviewed the Submissions and Amendment Report prepared by Sutherland & Associates Planning (dated March 2026) and accompanying technical and provides its comments and recommendations are provided in Attachment A. In summary:

*Biodiversity*

- Biodiversity – The development is no longer consistent with the plans in the biodiversity development assessment report (BDAR) waiver determination previously issued by CPHR. A new BDAR waiver application will therefore need to be submitted prior to determination of SSD-78156221.

*Flooding*

- Flooding – Insufficient information has provided in relation to overland flow paths affecting the site, basement car park crest levels and impacts to neighbouring properties. The proposal has also not appropriately considered the impacts of climate change.

Should you have any queries regarding this matter, please contact Rachel Walker, Senior Conservation Planning Officer via rachel.j.walker@environment.nsw.gov.au.

Yours sincerely,

S. Harrison

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

**Attachment A**

**CPHR response on the Submissions and Amendment Report – Mixed-use development with in-fill affordable housing - Cecil Avenue and Roger Avenue, Castle Hill (SSD-78156221)**

In preparing this advice CPHR has reviewed the following documents:

- Submissions and Amendment Report (Sutherland & Associates Planning, March 2026)
- Overland Flow Assessment for 93-107 Cecil Ave & 9-10 Roger Ave Castle Hill (Stellen Civil Engineering, 10 February 2026) (The Assessment)
- Civil Design for 93-107 Cecil Ave & 9-10 Roger Ave Castle Hil (Stellen Civil Engineering, Revision 1, 23 January 2026)
- Stormwater Management Plan 93-107 Cecil Ave & 9-10 Roger Ave Castle Hill (Stellen Civil Engineering, Revision 2, 10 February 2026)
- Water Management Report 93-107 Cecil Ave & 9-10 Roger Ave Castle Hill (Stellen Civil Engineering, 27 January 2026)
- Architectural Plans 93-107 Cecil Ave & 9-10 Roger Ave Castle Hill, Revision C (A Plus Design Group,19 December 2025)
- Arboriculture Impact Assessment (Xylem TreeCare, 4 March 2026) (AIA).

**Biodiversity**

CPHR issued its BDAR waiver determination for this application on 14 January 2025. The BDAR determination states “If the proposed development changes so that it is no longer consistent with this description, a further waiver request is required”.

The site plan submitted with the Submissions and Amendment Report indicates that the development footprint and building heights (storeys) are not consistent with the plans in the BDAR waiver. The AIA also identifies additional trees for removal.

Given the proposed development is no longer consistent with the BDAR waiver determination, a new BDAR waiver application will need to be submitted prior to the determination of the application.

**Flood Risk Management**

<u>Key Assessment Issues</u>

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| 1. | Insufficient information provided | The Overland Flow Assessment (the Assessment) has not provided sufficient information and has not addressed CPHR’s previous comments dated 9 May 2025.<br><br>The following should be addressed:<br>• The Assessment discusses overland flow paths and provides some flow rates; however, they have not been mapped, and it is unclear where the flow paths are located or how they interact with the site.<br>• The Assessment refers to appendices which have not been provided.<br>• The Assessment notes that an easement for trunk drainage and overland flow is to be redirected, and a realigned trunk drainage/overland flow path is noted on the Civil Plans. The overland flow path cross section and its flood behaviour that is depths, velocity and hazard, have not been identified. The realigned flow path includes multiple right-hand bends, which are not ideal for flood behaviour. The impact of this realignment on neighbouring properties has not been |

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| | | identified. The original easement location/overland flow path has not been provided.<br>• It is unclear what the levels of overland flow are at the basement car park access. It is noted that only a 1% crossfall to the crest level is included. This may not offer any protection to the basement from overland flows during more extreme storm events.<br>• The probably maximum flood (PMF) has not been assessed and the impact on the development is not clear.<br>• The Assessment has assumed flows from a sub-catchment at the intersection of Cecil Avenue and Terminus Street continue north along Terminus Street rather than flowing towards the development. The catchment topography suggests flows would continue down Cecil Avenue. This should be amended.<br><br>**Recommended action:**<br>• Provide a Flood Impact and Risk Assessment (FIRA) consistent with the NSW Government's Flood Risk Management Guideline LU01.The FIRA must identify flow paths affecting the site, required basement carpark crest levels and any impacts on neighbouring properties due to redirection of flows. |
| | *Extent and Timing* | Pre-determination |

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| 2. | The proposal has not appropriately considered the impacts of climate change | The Assessment discusses the impacts of climate change on the site's on-site detention (OSD) system and stormwater design. The Assessment has not identified the impacts of climate change on overland flow external to the site and how this impacts the site, as required by the SEARs.<br><br>**Recommended action:**<br>• Provide a FIRA which identifies any change in flood behaviour due to the impacts of climate change. |
| | *Extent and Timing* | Pre-determination |

**End of Submission**