



Michelle Niles
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(via Major Projects Portal: SSD-69257218)

Dear Ms Niles

Subject: Major Projects – Response To Submissions - Mixed use development with infill affordable housing, 25 Moss Vale Road Bomaderry (SSD-69257218) (Shoalhaven City)

Thank you for your referral dated 14 April 2026 (via the Major Projects Portal) regarding the abovementioned Response To Submissions (RTS). Following our advice at EIS exhibition dated 19 March 2025 and 4 April 2025, we now provide supplementary advice on floodplain risk management.

In summary, we note that a Biodiversity Development Assessment Report (BDAR) waiver for the current application was issued in August 2024, and that our previous comments relating to biodiversity have been satisfied to date. We recommend that the Vegetation Management Plan (VMP) supplied with the RTS, prepared to satisfy subdivision consent SF10851 approved by Shoalhaven City Council in 2022, should also be reviewed by Council. We remain available, however, to provide further comment on biodiversity-related draft conditions of consent if required.

The proposed development affects flood prone land and should be designed in accordance with the requirements of Shoalhaven City Councils Local Environmental Plan (LEP) and the NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual, 2023.

The development as proposed presents risks of adverse flood impacts to surrounding development and infrastructure as well as public safety risks. As such, DCCEEW recommend that the Determining Authority address these risks through additional analysis in a revised Flood Impact Risk Assessment (FIRA) to clarify and identify measures required to manage the associated flood risks, including notably to:

- seek and address emergency management advice from the NSW State Emergency Service (SES)
- incorporate a climate change assessment in determining flood risk, including for the probable maximum flood (PMF) event, and
- consult Shoalhaven City Council on the appropriate development controls for the proposed development, particularly any basement car parking located below the flood planning level.

Detailed comments on floodplain risk management are provided at **Attachment A**.

If you have any further questions about this matter, please contact Chris Page, Senior Team Leader on 4224 4180 or at chris.page@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tyrie', with a horizontal line above it.

Tyrie Starrs

Senior Manager South

Conservation Planning & Assessment

Conservation Programs, Heritage & Regulation

Department of Climate Change, Energy, the Environment and Water

28 April 2026

Attachment A: Detailed floodplain risk management comments – 25 Moss Vale Road Bomaderry

Attachment A: Mixed use development with infill housing - Detailed floodplain risk management comments

The State Significant Development Proposal (SSD) for the 25 Moss Vale Road Bomaderry site has been referred to DCCEEW CPHR by the Department of Planning, Housing and Infrastructure (DPHI) for flood advice. A Flood Impact and Risk Assessment (FIRA, Stantec, Jan 2026) has been provided to address previous CPHR advice (our ref: DOC25/282962).

Further assessment is recommended through the FIRA to enable a flood risk informed decision as discussed below.

The proposed development affects flood prone land and therefore, the proposal should be considered in accordance with the Secretary's Environmental Assessment Requirements (SEARs), Shoalhaven City Councils Local Environmental Plan and the NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual, 2023 (FRMM). Further information about the Flood Risk Management Manual and supporting guidance can be found here: [Flood Risk Management Manual | NSW Environment and Heritage](#) & [Understanding and Managing Flood Risk | NSW Environment and Heritage](#)

Consideration of the impacts of climate change on development is a requirement of the SEARs, the Local Planning Direction, Council's LEP and DCP. Climate change is a key issue such that flood planning levels address the performance criteria over the anticipated design life of the proposal including understanding the consequences of flooding to residential development proposed on the floodplain. Climate change has been assessed in the FIRA as a sensitivity, but not consistently through the FIRA to understand the potential flood risk. It is unclear if climate change has been considered in the Probable Maximum Flood Event (PMF). The FIRA should consider the impacts of climate change utilising the guidance provided in the Australian Rainfall and Runoff (ARR) Climate Change Consideration Chapter, noting this also applies to the PMF event.

The FIRA should demonstrate that the development does not result in adverse impacts to flood behaviour across the full range of flood events considering flood levels, velocities, hazards, categories and duration. The FIRA demonstrates that extensive flood impacts will occur in the PMF event including to existing residential development. These impacts are caused by filling in the floodplain and measures to mitigate these impacts have not been explored in the FIRA.

The investigation of flood impacts in the FIRA is restricted to levels, not to the range of impacts as detailed above and in the FIRA Guide LU01, and impacts presented do not consider climate change. It is recommended that the FIRA is updated to provide the appropriate information to enable the Determining Authority to understand any potential flood impacts and how they will be managed.

The true flood risks to the proposed development including basement car parks are not sufficiently detailed in the FIRA. The FIRA proposes to set the entry level to the carpark to a level below the Flood Planning Level (FPL, considering climate change). It is recommended that the Determining Authority consults Shoalhaven City Council on the appropriate definition of the FPL and on development controls for the proposed development including any basement car parking to ensure the proposed design is suitable prior to progressing the proposal.

The FIRA will need to consider and address the full range of flood related risks associated with public safety. It appears that climate change has not been considered in the PMF modelling in accordance with ARR. Therefore, the hazards to the proposed development in extreme flood events are not understood but are likely to be significantly higher than documented in the FIRA. It is recommended that the FIRA is updated to enable informed advice to be sought from the NSW SES. Additional information such as time to inundation of the proposed development will also be required. The FIRA should then demonstrate the outcomes of consultation with the SES on the adequacy of any proposed flood response measures, emergency access requirements and consistency with local flood emergency response planning. Further guidance on emergency management planning can also be found in the EM01 guide here: [Support for Emergency Management Planning](#).