



Your ref: SSD-93222706
Our ref: DOC26/244500

Jude Urbanik
Department Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

2 June 2026

Subject: Environmental Impact Statement (EIS) - Waterloo Estate (South) Concept (SSD-93222706)

Dear Jude,

Thank you for your email dated 4 May 2026 seeking advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water on the above concurrent rezoning and State significant development application (SSDA).

According to the EIS, the Concept SSDA seeks *consent for the land uses, building envelopes, indicative development yields and distribution of development, public domain outcomes, and infrastructure delivery parameters which will inform the future detailed applications undertaken for the site.*

CPHR has reviewed the *Concept State Significant Development Application Environmental Impact Statement Concept Proposal for Waterloo Estate (South)* (Beam, 16 April 2025) and accompanying technical reports and provides comments and recommendations at Attachment A.

In summary, detailed assessment and update of the *Waterloo South – Flood Impact and Risk Assessment* (GRC Hydro, 13 April 2026) will be required for each development proposal in Waterloo Estate South Precinct.

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

Yours sincerely,

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

CPHR advice – EIS - Waterloo Estate (South) Concept (SSD-93222706)

In preparing this advice CPHR has reviewed the following documents:

- *Concept State Significant Development Application Environmental Impact Statement Concept Proposal for Waterloo Estate (South)* (Beam, 16 April 2026) (EIS)
- *Waterloo South – Flood Impact and Risk Assessment* (GRC Hydro Version D, 13 April 2026) (FIRA).

BiodiversityKey Assessment Issue

1	Biodiversity Development Assessment Report (BDAR) waiver	CPHR issued its BDAR waiver determination on 9 February 2026. <i>As detailed in the determination letter, If the proposed development changes so that it is no longer consistent with this description, a further waiver request is required.</i>
	<i>Extent and Timing</i>	Prior to determination

FloodingKey Assessment Issues

2	Impacts on local roadways are up to 100mm which would be considered unacceptable.	The FIRA indicates that flood impacts can be managed however it relies on existing landscape and roadway levels being maintained at the existing levels or potentially lowered to facilitate overland flow through the site. It is likely in detailed design that access issues will result in changes to these levels. The FIRA currently shows flood impacts up to 100mm in local roads serving the precinct due to restriction of flows to roadways around the enlarged building footprint. This is considered to be in excess of the generally accepted impact and will need further management throughout the progress of the development. Recommended action Update the FIRA as the development progresses. Mitigation measures will be required to reduce offsite impacts.
	<i>Extent and Timing</i>	During consideration of development applications or SSD applications for sites 8, 9, 2 and 3.

3.	The proposal is not yet developed to an extent where it is feasible to nominate finished floor levels to ensure protection of future buildings.	The FIRA nominates minimum finished floor levels to achieve Flood Planning Level Compliance including probable maximum flood (PMF) protection of the proposed basements. The levels nominated are likely to change through the detailed design and it has not been shown that the levels will be achievable and that this can be done with passive measures rather than mechanical protection. Recommended action Update the FIRA to ensure that finished floor levels and basement protection levels are achieved in the final design of each project. Passive protection of entry points to building and basement is required.
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	<i>Extent and Timing</i>	During consideration of development applications or SSD applications.
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4.	Climate change impacts have been carried out as a sensitivity test only and have not been used to determine flood planning requirements.	The FIRA has carried out climate change sensitivity plans for the proposed development area and shows that the area is sensitive to climate change and that increase in flood levels occurs under the various climate change scenarios. Present day climate change levels in accordance with ARR4.2 would be the minimum design criteria. The developments are likely to be built over an extended period and have a long lifespan post construction. Floor levels and other mitigation measures should therefore achieve adequate protection to at least 2050 in accordance with the draft Climate Change and Natural Hazards State Environmental Planning Policy (SEPP) advice. Recommended action Use the climate change modelling results to enable design floor levels and other mitigation measures to achieve protection to at least 2050 in accordance with the draft Climate Change and Natural Hazards SEPP recommendations.
	<i>Extent and Timing</i>	During consideration of development applications or SSD applications.

5.	Ingress of water into the buildings may result in inundation of basements.	The FIRA notes that shelter in place will be required for future development on site and that over floor flooding will occur for floods in excess of the modelled 1% Annual Exceedance Probability flood which requires access to floor levels above the PMF for each building. Over floor flooding will also compromise the ability to prevent water entry into basements. Recommended action Protect all potential entry points to the basement including lift shafts, fire stairs, ramps and ventilation openings to the PMF, particularly if shelter in place is the preferred evacuation strategy.
	<i>Extent and Timing</i>	During consideration of development applications or SSD applications.

END OF SUBMISSION