

Our Ref: ID 3925
Your Ref: SSD-97092958

2 July 2026

Emma Butcher
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: Emma.Butcher@dpie.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Emma,

State Significant Development Application for Bullecourt Avenue, Milperra- Early Works & Stage 1 (RTS)

Thank you for the opportunity to provide advice on the State Significant Development Application for Bullecourt Avenue, Milperra- Early Works & Stage 1, 2 & 2A Bullecourt Road, Milperra. It is understood that the proposed development in total includes 385 dwellings, three public parks, roads, infrastructure and conservation land across two SSDAs. This SSDA comprises:

- All civil works across the site.
- Construction of 62 dwellings across two stages.
- Tree removal and land remediation.

We have reviewed the following documents provided as part of the preparation of our advice.

- Beam Planning, 2026, Response to Submissions Report
- Beveridge Williams, 2026, Flood Impact and Risk Assessment

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 note the proposal has considered flooding issues 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 Planning Circular [PS 26-001 Flooding and land use planning](#).

We refer to our previous correspondence dated and meeting held on 5 March 2026. NSW SES notes and appreciates the clarifications and revisions to the FIRA regarding the Emergency Response for the precinct and dwellings affected by flooding.

It is further noted while the site is affected by both local flash flooding and regional flooding from the Georges River under proposed conditions, the Flood Planning Level and all residential lots are proposed to be located above the local Probable Maximum Flood (PMF) level and above the regional 0.2% Annual Exceedance Probability (AEP) level,¹ however up to 8 of the proposed dwelling driveways would be cut off from evacuation during events of this size.² During the Georges River PMF event flood levels are up to 6 metres higher³ with 136 of the proposed dwellings inundated,⁴ many by high hazard (H5) flooding.⁵ This level of hazard is unsafe for all people and vehicles with buildings requiring special engineering design and construction.

We offer the following additional advice.

In summary, we recommend:

- **Pursuing design options which allow for rising road evacuation for all dwellings** where possible. The eight sites which have driveways cut off from evacuation during more frequent flood events, prior to becoming inundated are classified as low flood islands and present a risk to life for occupants.
- Proposed dwellings affected by high hazard flooding during the PMF are required to be constructed **from flood compatible materials and are designed to withstand flood forces and debris as a condition of consent**.

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](#)

¹ Beveridge Williams, 2026, Flood Impact and Risk Assessment, Section 6 Hydraulic Modelling – Regional Flooding, Page 22

² Beveridge Williams, 2026, Flood Impact and Risk Assessment, Table 5: Regional Flood Dwellings Inundated/Cut Off, Page 29

³ Beveridge Williams, 2026, Flood Impact and Risk Assessment, Table 4: Regional Flood Levels (JWP, 2023), Page 22

⁴ Beveridge Williams, 2026, Flood Impact and Risk Assessment, Table 5: Regional Flood Dwellings Inundated/Cut Off, Page 29

⁵ Beveridge Williams, 2026, Flood Impact and Risk Assessment, PMF Flood Hazard Developed Condition, Appendix D Page 150

Please feel free to contact Kate Dawes via email at 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,

A handwritten signature in dark ink, appearing to read 'P. Cinque', is positioned above the printed name.

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