Department of Climate Change, Energy, the Environment and Water

Your ref: SSD-119545240
Our ref: DOC26/387653-1

Caitlin Hopper
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Department of Planning, Housing and Infrastructure
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24 July 2026

Subject: Major Projects – New Request for Advice - Residential Flat Building at 40-76 William Street, Leichhardt (SSD-119545240) (Inner West)

Dear Caitlin,

Thank you for your email dated 10 July 2026 seeking advice from the Marine Coast Estuary and Flood (MCEF) branch of the Conservation Programs, Heritage and Regulation Group (CPHR) in relation to the Residential Flat Building at 40-76 William Street, Leichhardt (SSD-119545240).

MCEF has reviewed the *Residential Flat Building at 40-76 William Street SSD-119545240 - Flood Impact and Risk Assessment Report* prepared by Beveridge Williams, March 2023. Detailed assessment is included in the table at Attachment 1.

If you have any further questions about this issue, please do not hesitate to contact Angela Halcrow, Senior Natural Resources Officer, Floodplain Management at planningreferrals.mcefgs@dcceew.nsw.gov.au

Yours sincerely,

Daylan Cameron
Senior Team Leader – Coast & Flood (Greater Sydney)
Marine Coast Estuary and Flood
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Reliance on Basement carpark Food barriers	The proposal relies on flood barriers to mitigate risks to life and property associated with basement inundation. The proposed basement car park entry is located on William Street. The FIRA identifies that William Street is subject to high flood hazard conditions (H5–H6) during the 1% AEP flood event, with significant flood depths and velocities occurring immediately adjacent to the basement entry. Under these conditions, failure of the proposed flood barrier due to mechanical malfunction, inadequate maintenance, loss of power, operational error or other unforeseen circumstances could result in the rapid inundation of the basement car park. This creates a significant risk to life should residents attempt to access the basement or retrieve vehicles during a flood event, in addition to the potential for substantial property damage. The proposal relies on an active flood protection measure rather than a passive flood mitigation solution. Unlike passive measures, flood barriers require ongoing inspection, testing, maintenance and replacement throughout the life of the development to ensure they remain effective. The long-term performance of the system is dependent on future owners, strata managers and building operators maintaining awareness of the flood risk and implementing maintenance and operational requirements indefinitely. The FIRA has not adequately considered: ▪ failure modes associated with the proposed flood barrier system ▪ the consequences of barrier failure under high hazard floodway conditions ▪ the rate and extent of basement inundation should barrier failure occur ▪ ongoing maintenance, inspection and testing requirements ▪ governance arrangements to ensure long-term compliance ▪ residual risks to life and property associated with barrier malfunction or human error. The Flood Risk Management Manual and EM01 Support for Emergency Management Planning recognise the limitations of measures that rely on ongoing human intervention, management actions or site-specific operational procedures. Such measures may become ineffective if they are not maintained, understood or implemented as intended over the life of the development. EM01 specifically notes that measures relying on ongoing occupant awareness and management may be forgotten or fail when flood conditions exceed planning assumptions. **Recommendation** Investigate opportunities to reduce reliance on active flood protection measures through the adoption of passive flood mitigation solutions. This may include raising the basement entry, redesigning the basement access arrangement, or relocating the basement car park entry to North Street, where flood risk appears lower than along William Street. Assess the consequences of failure of the proposed flood barrier system and demonstrate that residual risks to life and property remain acceptable in the event of barrier failure.
Extent and Timing	Post determination

Assessment of the Full Range of Flood Risk	Insufficient flood information has been provided to adequately assess the full range of flood risk affecting the site and future occupants. The FIRA only provides flood mapping and hazard information for the 1% AEP and PMF events. The assessment demonstrates that the site is subject to significant flooding during the 1% AEP event, including H5–H6 flood hazard conditions affecting William Street. However, no information has been provided for more frequent flood events. As a result, the assessment does not adequately identify: ▪ the frequency at which site access is affected by flooding ▪ the frequency of hazardous flooding along William Street ▪ the frequency of resident isolation ▪ the frequency of emergency access and evacuation constraints ▪ the full range of flood risk likely to be experienced by future residents. Flood Risk Management Guideline LU01 and EM01 require consideration of the full range of flooding and associated emergency management constraints, including isolation, evacuation and access issues across multiple flood events. The current assessment does not adequately address these requirements. **Recommendation** Provide flood mapping, hazard mapping and emergency management assessment for the full range of flood events, including the 10%, 5%, 1%, 0.5% (or 0.2%) AEP and PMF events.
Extent and Timing	Post determination

Access and Egress Route	The proposed primary vehicular access is from William Street. The FIRA identifies that William Street is subject to H5–H6 flood hazard conditions and flood depths of up to approximately 0.6 m during the 1% AEP event. Given the severity of flooding during the 1% AEP event, it is reasonable to expect that access may also be compromised during more frequent events; however, insufficient flood information has been provided to determine the frequency of disruption. This increases the risk of future residents interacting with hazardous floodwaters when attempting to enter, leave or return to the development during flood events. This raises concerns regarding the suitability and resilience of the proposed access arrangement. **Recommendation** Assess the feasibility of relocating the basement car park entry and primary vehicular access to North Street. Demonstrate that residents will not be exposed to unacceptable flood risk when accessing or returning to the site across the full range of flood events.
Extent and Timing	Post determination