



Your ref: SSD-74439970
Our ref: DOC25/1483319

Jasmine Tranquille
Senior Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy St,
Parramatta NSW 2150

21 March 2025

**Subject: Mixed use development with in-fill affordable housing – SSD-74439970 –
Environmental Impact Statement**

Dear Jasmine,

Thank you for your referral received 24 February 2024 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group on the Environmental Impact Statement (EIS) for this State Significant Development (SSD-74439970).

CPHR has reviewed the EIS (Mecone, 20 January 2025) and accompanying Flood Impact Study (S&G Consultants, 7 November 2024).

CPHR advises that the provided Flood Impact Study does not meet the requirements of the Secretary's environmental assessment requirements (SEARs). Please see Attachment A for CPHR's detailed comments and recommendations. All recommendations require addressing by the proponent prior to determination to ensure compliance with the SEARs is demonstrated.

Should you have any queries regarding this matter, please contact Peter Braga, Conservation Planning Officer via peter.braga@environment.nsw.gov.au.

Yours sincerely,

Louisa Clark
**Director, Greater Sydney
Regional Delivery
Conservation Programs, Heritage and Regulation**

CPHR response on the EIS for Mixed use development with in-fill affordable housing – SSD-74439970

Flood risk management

The following comments are provided regarding flooding considerations:

Flood planning levels have not been identified from adopted studies	The Flood Impact Study references a Council study and requirements from the Willoughby Development Control Plan 2023 (WDCP2023); however, it does not indicate how flood planning levels have been determined for the development. The study states that floor levels meet the flood planning level of the 1% Annual Exceedance Probability (AEP) plus 500 mm freeboard and that this is higher than the Probable Maximum Flood (PMF) level. It also states that basement entry will be ramped to this level. The provided Flood Impact Study references the Blue Gum Creek flood study which is the incorrect study for this location. The site is in the Scotts Creek catchment. Recommended action: CPHR recommends the proponent: • clarifies if flood planning levels have been determined by the provided flood study or obtained from an adopted Council study. • demonstrates that all accesses including ventilation openings and service ducts for the basement are located above the required flood planning level.
Extent and Timing	Pre-determination
Flood Impact Risk Assessment (FIRA) is not adequate	The Flood Impact Study has not been prepared in accordance with the requirements of the flood impact and risk assessment, flood risk management guideline LU01. The Flood Impact Study appears to have inconsistent treatment of buildings with some buildings showing significant ponding on the roof and others with the building footprint blocked out. Flow paths do not appear to be consistent with topography or building locations. The resulting mapping will therefore give incorrect results regarding location and depths of flow paths and cannot be used in its current form to set flood planning levels or demonstrate flood impact. Flood modelling has only been provided for the 1% event and for the post development PMF depths. The Flood Impact and Risk Assessment, Flood risk management guideline LU01 requires a full range of events to be modelled together with hazard and hydraulic category. Impact assessment should also be provided for the PMF event. Impact assessment should include assessment of the criteria in Table 3 of the LU01 guideline and not be limited to change in flood depth alone. Design events and model outputs are listed in Table 6 of the LU01 guideline. Recommended action: CPHR recommends the proponent's flood modelling will need to use the same approach for building treatment throughout the model and demonstrate that it identifies flow paths and depths for risk

	assessment. A smaller grid size may be required. Further, the proponent should model all recommended events and impact assessments as noted in Flood Impact Risk Assessment, Flood risk management guideline LU01.
Extent and Timing	Pre-determination

Climate change has not been considered	No assessment of climate change impacts on flood levels or behaviour has been included in the Flood Impact Study. Recommended action: CPRH recommends the proponent's flood modelling should be updated to include climate change assessment as per Section 2.6.2 of FB01.
Extent and Timing	Pre-determination

Access is not addressed	Basement access is shown at the end of Hammond Lane. This appears to be the most flood affected section of the site. No consideration of the appropriateness of this location has occurred. No hazard mapping has been provided for the PMF event. Evacuation ability has not been demonstrated. Recommended action: CPRH recommends that the proponent assesses hazard levels are to the surrounding road network to ensure that safe evacuation is possible.
Extent and Timing	Pre-determination

Flood emergency response plan has not been provided	The Flood Impact Study has not carried out a risk assessment and has not provided a Flood Emergency Response Plan (FERP) as noted in the flood related SEARs. Recommended action: CPRH recommends that the proponent carries out a risk assessment and prepares a suitable flood emergency response plan. If safe evacuation cannot be demonstrated, consultation should be undertaken with the State Emergency Service (SES).
Extent and Timing	Pre-determination

Outdated flood manual has been referenced and current guidance not used	The Flood Impact Study references the 2005 Floodplain Development Manual. This manual was replaced by the 2023 Floodplain Risk Management Manual and associated guidance. Recommended action: CPRH recommends the proponent prepares the flood study and FIRA in accordance with the latest manual and guidance as required by the SEARs.
Extent and Timing	Pre-determination

End of Submission