



Your ref: SSD-78996460
Our ref: DOC25/361505

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

12 June 2025

**Subject: Residential development with infill affordable housing – SSD-78996460–
Environmental Impact Statement**

Dear Jasmine,

Thank you for your referral received 29 April 2025 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group on the Environmental Impact Statement (EIS) for this State Significant Development (SSD-78996460) located at 16-24 Lord Street and 21-27 Roseville Avenue, Roseville.

CPHR has reviewed the EIS (Urbis, 16 April 2025) and accompanying documentation and provides its comments and recommendations below and at Attachment A.

While the proponent has provided the required reports regarding flood risk management noted in the SEARs, these have not adequately assessed matters relating to flood behaviour, flood impacts and flood emergency in relation to the proposed development. CPHR recommends that the Flood Impact Risk Assessment Report (PTC, 1 April 2025) is updated to address the Key Assessment Issues identified at Attachment A.

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**

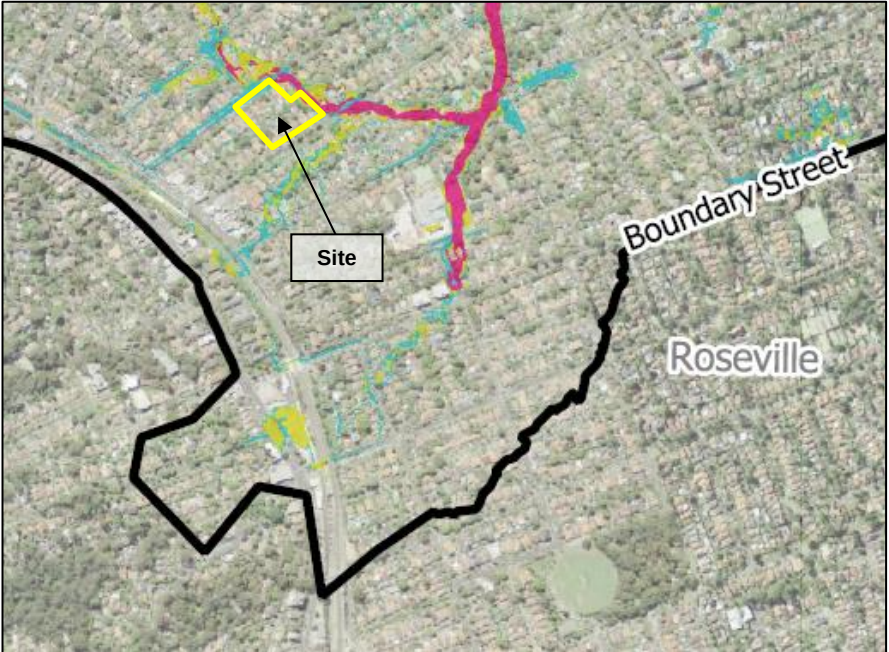
CPHR response on the EIS for residential development with infill affordable housing – SSD-78996460

CPHR has reviewed the flood information for the proposed residential development with infill affordable housing in Roseville. CPHR has reviewed following documents:

- Environmental Impact Statement, Urbis, dated 16 April 2025
- Appendix T – Flood Impact Risk Assessment Report, PTC, dated 1 April 2025

Flood Risk Management

Key Assessment Issues

1	<i>Flood Behaviour</i>	The Flooding SEARs require a Flood Impact and Risk Assessment (FIRA) to be prepared in accordance with the <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i> (DPE, June 2023). The <i>Flood Impact and Risk Assessment Report</i> (PTC, 1 April 2025) (Flood Report) provided as part of this EIS does not provide adequate information to ensure flood constraints in the vicinity of the development can be effectively considered. The typical outputs of an adequate flood assessment are outlined in Table 6 of the <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i>. <u>Existing Condition</u> The site is impacted by flooding as identified by Council's Middle Harbour Flood Study Southern catchment. The site in its existing condition is partially affected by overland flooding in events equal to and rarer than the 20% Annual Exceedance Probability (AEP). In the 1% AEP, the eastern boundary of the site includes a major floodway and flood storage area. In the Probable Maximum Flood (PMF), the eastern part of the site experiences an inundation depth of 1.8m.  Figure 1: 1% Hydraulic categories
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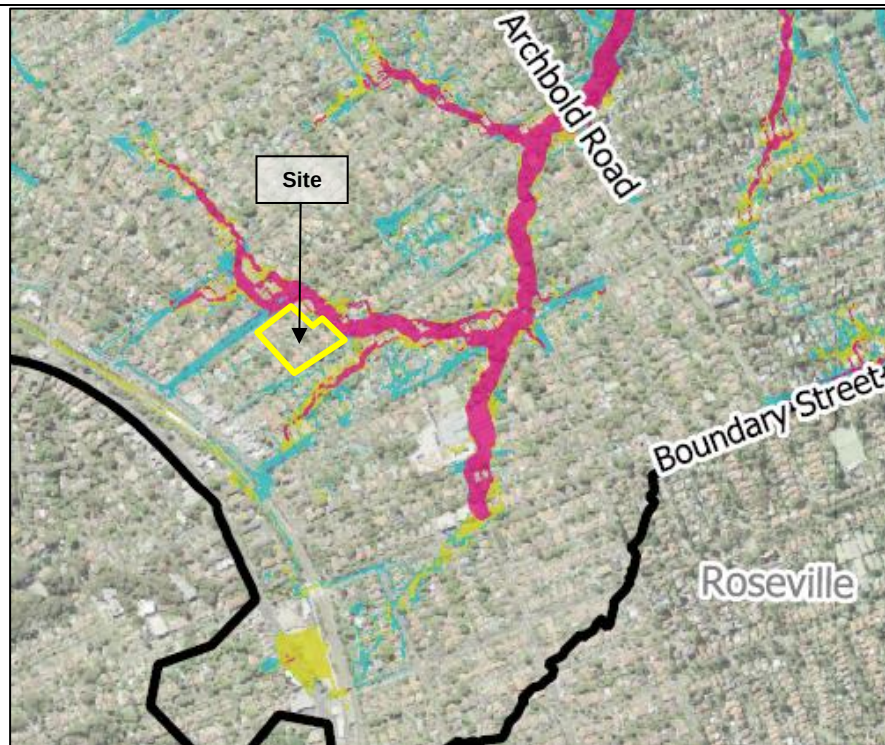


Figure 2: PMF Hydraulic categories

In rarer events Roseville Street, Martin Lane and the eastern part of the site are impacted by high hazard H5 flooding.

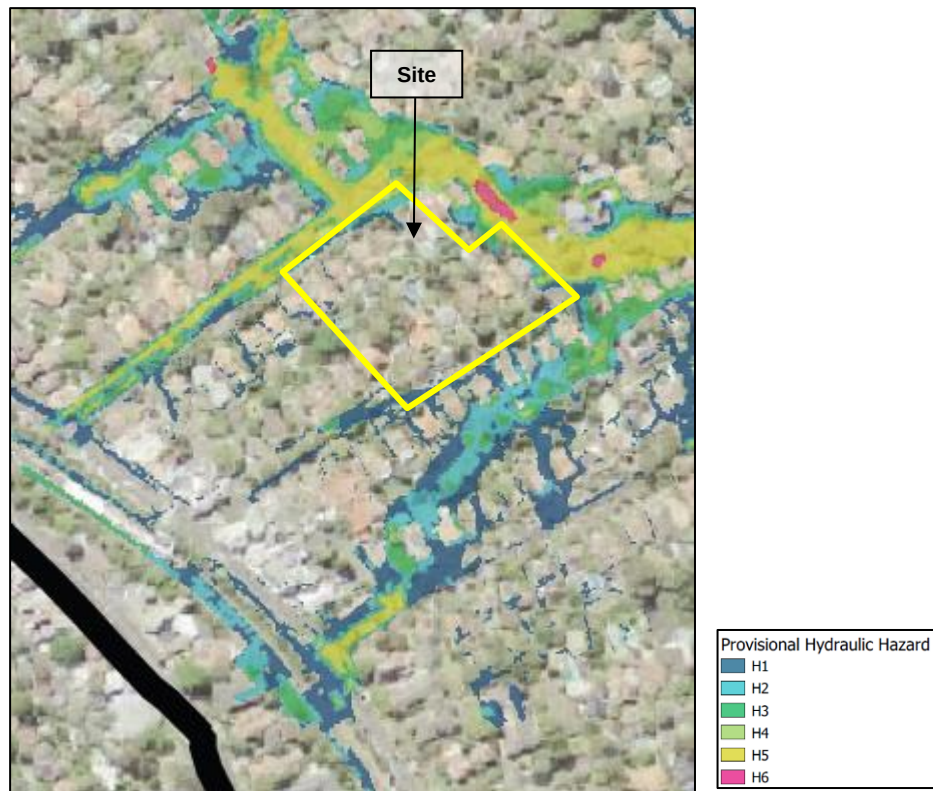


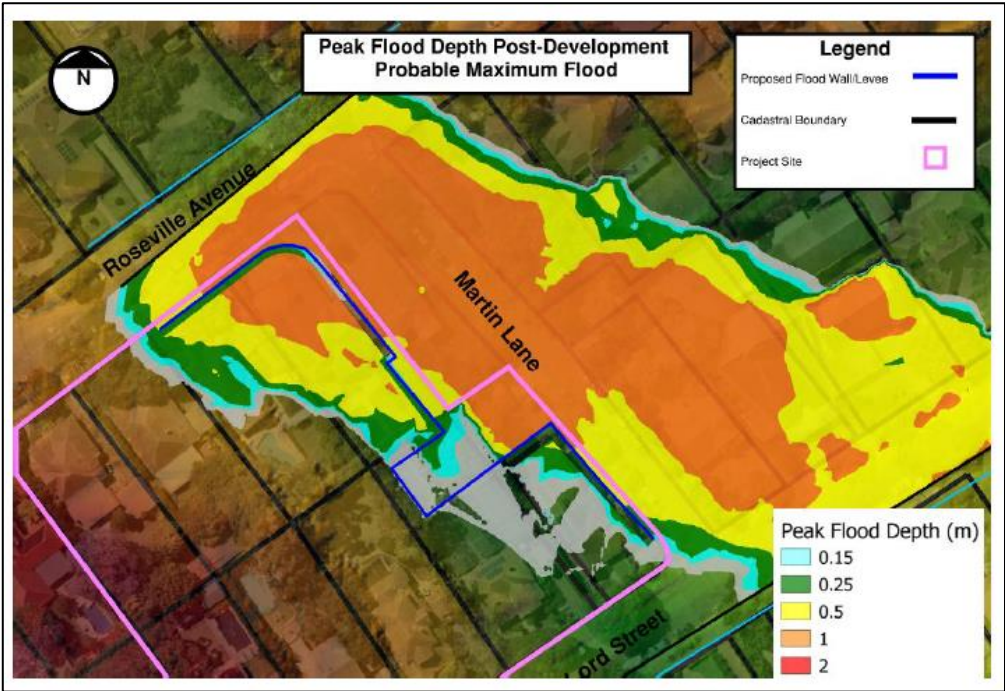
Figure 3: PMF Hazard categories

The FIRA Report indicates that a HECRAS 2D model has been established and verified to Council's *Middle Harbour Southern Catchments Flood Study* (BMT, 10 February 2023). The FIRA Report provides brief information on the 1% AEP and PMF.

Developed Condition

		The Flood Report provides brief information on the flood behaviour in the 1% AEP and PMF for the developed condition. The Flood Report proposes the implementation of a barrier wall starting at 25 Roseville Avenue to the south-eastern boundary at the intersection of Martin Lane and Lord Street to provide flood immunity for flood events up to and including the 1% AEP. However, the Flood Report also proposes setting the flood planning level lower than the required 1% AEP plus freeboard stating, “The habitable floor level may be set lower as the proposed flood wall is providing protection to the Design Flood Standard.” CPHR highlights that this is not acceptable. The minimum floor levels generally relate to specific development standards, such as the flood planning levels (FPLs), relevant to the development type. Development standards do not change by the implementation of mitigation measures such as a barrier wall. The habitable floor level must not be less than the 1% AEP plus freeboard. Recommended action: The Flood Report should be updated to: • provide information on flood behaviour, flood constraints and flood risk for the full range of flooding for both existing and post developed conditions • set the habitable floor level at not less than the 1% AEP plus freeboard.
	<i>Extent and Timing</i>	Pre-determination

2	<i>Flood Impacts</i>	The Flood Report’s assessment is limited to the 1% AEP. No information has been provided for the full range of flooding. The Flood Report indicates that in the 1% AEP there is an adverse impact on the public pedestrian footpath along Roseville Avenue and Martin Lane, and the afflux on the footpath is up to 190mm, increasing the depth of flow to 0.53m. CPHR considers this impact is unacceptable as it would increase the risk to the community. The afflux should be reduced to an acceptable level (50mm) as required by Council’s Development Control Plan (DCP). The Flood Report indicates that there would be minimal increase in flow velocity and the maximum flow velocity is 0.7m/s and concludes, “There is no post-development impact on the flood hazard categorisation of the project site and surrounding regions.” CPHR does not agree with this conclusion as the increase in flow depth with the minimal increase in flow velocity would likely change the hazard category. Recommended action: The Flood Report should be updated to provide information on the impacts of the development on flooding and on the community for the full range of flooding. The afflux should be reduced to an acceptable level (50mm) as required by Council’s DCP. Mitigation measures should be proposed to ensure that the impact of the development is acceptable and does not increase the risk to the community.
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	Extent and Timing	Pre-determination
3	Flood Emergency	Section 8 of the Flood Report provides a brief discussion on the flood emergency strategy. The site is accessible from Lord Street where the basement driveway entrance is located. However, a flood depth of 1.8m occurs within the development including where the 'Building A' entrance is located.  Figure 4: Post Development Peak Flood Depth of PMF Event The Flood Report proposes two strategies, i.e. shelter in place and evacuation, but provides no details. Recommended action: The Flood Report should demonstrate that evacuation can be undertaken consistent with the Local Flood Plan or State Emergency Service (SES) flood emergency strategy for the area. If evacuation is not feasible, the Flood Report should refer to the <i>Shelter in place guideline for flash flooding</i> (DPHI, January 2025). These guidelines provide ten shelter in place considerations which should be addressed in the Flood Report to assess if shelter in place is an appropriate emergency management strategy for the site.
	Extent and Timing	Pre-determination

End of Submission