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Parramatta NSW 2124

Via Major Portal

email: justin.keen@dpie.nsw.gov.au
CC: helen.slater@ses.nsw.gov.au

Dear Justin,

Environmental Impact Assessment for 1-3 Reid Street & 2-4 Woodside Avenue, Lindfield

Thank you for the opportunity to provide comment on the Environmental Impact Assessment (EIS) for 1-3 Reid Street & 2-4 Woodside Avenue, Lindfield. It is understood that the proposed development seeks consent for:

- Site preparation works, including the demolition of existing site structures, tree removal, basement excavation and preparatory earthworks.
- The construction of a new residential flat building development comprising:
 - A total of eighty-nine dwellings including 22 affordable apartments.
 - Top of building communal open space including soft landscaping and seating areas.
 - Ground floor communal area.
 - Two levels of basement parking for 127 car parking spaces, 99 bicycle spaces, services and waste room.
- Installation of a new substation.
- Associated landscaping and public domain works including offsite stormwater mitigation works to Reid Street, Lindfield Avenue and Woodside Avenue.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunamis 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.

The NSW SES recommends that consideration of flooding issues is undertaken 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 directions and circulars relating to the *Environmental Planning and Assessment Act, 1979*. Some of the issues which are of concern to the NSW SES are detailed in Attachment A.

In summary, we do not support the proposal in its current form, as it would result in an increased number of individuals being exposed to significant flood risks. Furthermore, the proposal does not sufficiently demonstrate that these risks have been appropriately mitigated. The site is located in an overland flow path and becomes inundated as frequently as the 5% Annual Exceedance Probability (AEP) event.¹ During the Probable Maximum Flood (PMF) event the site, as well as all surrounding streets become inundated to depths of up to 1 metre² and reach Hazard Level 5 (H5).³ This level of hazard is unsafe for all people and vehicles, with buildings needing special engineering design and construction.

Should the proposal progress, we further:

- **Recommend** ensuring that the current proposal does not result in an increase in flood risk on the existing development and roadways.⁴
- **Recommend** careful consideration of the suitability of the Shelter-in-Place strategy. As surrounding streets are affected by H5 hazard as frequently as the 5% AEP event, and the site itself reaches H5 flooding during the PMF, with little warning time available, Shelter-in-Place may pose a risk to both the occupants and the buildings. This site may not satisfy Shelter-In-Place consideration 8(c) of the Shelter-In-Place guideline.⁵
- **Recommend** undertaking additional modelling to understand the duration of inundation on site and duration of flooding on adjacent roads, including consideration for other recent and approved future development in the area.
- **Recommend** ensuring that all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF) and/or the 1% AEP plus freeboard whichever is greater, or reconsidering basement carparking if this is not feasible to reduce risk to life and property. Mapping provided in the Flood Impact and Risk Assessment appears to show flood water entering the basement ramp in the 1% AEP and larger flood events.⁶

¹ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F4 5% AEP Pre-Development Flood Depth and Level Plan, Page 53

² Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F25 PMF Post-Development Flood Depth and Level Plan, Page 74

³ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F27 PMF Post Development Flood Hazard Vulnerability Classification Plan, Page 76

⁴ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F35 PMF Post-Development Flood Hazard Difference Plan, Page 84

⁵ Department of Planning, Housing and Infrastructure, 2025, Shelter-in-place Guideline for Flash Flooding, Shelter-in-place considerations, Page 5

⁶ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F13 1% AEP Post-Development Flood Depth and Level Plan, Page 62

- **Recommend** relocation of the substation and waste areas to be above the PMF and/or the 1% AEP plus freeboard whichever is greater.
- **Recommend** seeking advice from the Conservation Programs, Heritage and Regulation section of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour and adjacent areas.

You may also find the following Guidelines available on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

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,



Peter Cinque
Senior Manager Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁷

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan⁸ and the Hornsby Ku-Ring-Gai Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.⁹

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. Climate change considerations should also be included.

The site is located in an overland flow path and becomes inundated as frequently as the 5% AEP event by low level flooding up to 0.1 metres in depth.¹⁰ In the 1% AEP event flooding on the site remains at low levels, while Lindfield Avenue becomes un-trafficable, reaching Hazard Level 5 (H5).

During the PMF event the site, as well as all surrounding streets become inundated to depths of up to 1 metre¹¹ and H5.¹² This level of hazard is unsafe for all people and vehicles, with buildings needing special engineering design and construction.

⁷ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

⁸ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34.

⁹ NSW SES, Hornsby Ku-Ring-Gai Flood Emergency Sub Plan, Endorsed December 2023, Section 5.8

¹⁰ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F4 5% AEP Pre-Development Flood Depth and Level Plan, Page 53

¹¹ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F25 PMF Post-Development Flood Depth and Level Plan, Page 74

¹² Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F27 PMF Post Development Flood Hazard Vulnerability Classification Plan, Page 76

While the proposed mitigation measures appear to decrease flood depth on the site itself as well as Lindfield Avenue¹³, mapping for both velocity¹⁴ and hazard show increases¹⁵, in some locations increasing by four hazard categories.¹⁶ This significantly increases the risk to the community by increasing the level of hazard on Reid Street from H1 to H5.

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

Basement car parks have inherent risks to life and property¹⁷ and can often restrict safe evacuation of the occupants. This can be managed through building design, such as crest levels above a certain level (e.g. the PMF) to prevent water ingress and flooding. Mapping provided in the Flood Impact and Risk Assessment appears to show flood water entering the basement ramp in the 1% AEP and larger flood events with flood levels in the area of the basement ramp shown at a level of 88.4m AHD in the 1% AEP event¹⁸ while the level of the basement ramp create at 88.35m AHD.¹⁹ This does not appear to be consistent with the Environmental Impact Statement which states *“the crest of the basement driveway (is) at 1% AEP flood level plus 150mm freeboard.”*²⁰

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing risks associated with Low Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

¹³ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F4 5% AEP Pre-Development Flood Depth and Level Plan, Page 53

¹⁴ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F26 PMF Post-Development Flood Velocity Plan, Page 75

¹⁵ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F27 PMF Post Development Flood Hazard Vulnerability Classification Plan, Page 76

¹⁶ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F35 PMF Post-Development Flood Hazard Difference Plan, Page 84

¹⁷ Collier, L. Phillips, B., and Griffin, M. 2017. Basement Development in the Floodplain. Floodplain Management Australia Conference. Newcastle, 2017

¹⁸ Hydracor, 2025, Integrated Water Management Plan, Annexure B Flood Impact and Risk Assessment, Sheet F13 1% AEP Post-Development Flood Depth and Level Plan, Page 62

¹⁹ PBD Architects, 2025, Page 8

²⁰ Mecone, 2025, Environmental Impact Statement, Flood Impact, Page 8

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Principle 5 Risks faced by the itinerant population need to be managed.

Any Emergency Management strategy needs to consider people visiting the area or using a development. We recommend ensuring consideration of the NSW Government Shelter in Place Guideline for Flash Flooding²¹.

Principle 6 Recognise the need for effective flood warning and associated limitations.

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner. As the site is affected by overland flooding little to no warning time is likely to be available with Severe Weather Warnings and Severe Thunderstorm Warnings from the Bureau of Meteorology the only warnings currently available.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response operations.

If the development proceeds, the flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase. However, it is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.

²¹ Department of Planning, Housing and Infrastructure, 2025, Shelter-in-place Guideline for Flash Flooding