



Edwina Ross
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4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

4 September 2025

**Subject: Mixed-use development with in-fill affordable housing – SSD-80432461 –
Environmental Impact Statement**

Dear Edwina,

Thank you for your referral received 8 August 2025 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group on the Environmental Impact Statement (EIS) for this State Significant Development (SSD-80432461) located at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield.

CPHR has reviewed the EIS (Ethos Urban, 12 June 2025), accompanying documentation and provides its comments and recommendations below and at Attachment A.

Flood risk management

The *Flood Impact and Risk Assessment* (Telford Civil Consulting Engineers, 20 March 2025) (FIRA) has not adequately addressed the impacts of flooding, especially during the Probable Maximum Flood (PMF) event. The FIRA should be updated to address the relevant flood studies and review the emergency and response planning to demonstrate that the proposed development is compatible with the flood risk of the site.

Biodiversity

The development is consistent with the Biodiversity Development Assessment Report (BDAR) waiver granted by CPHR on 7 March 2025. Please note, if the proposed development is changed prior to determination so that it is no longer as described in Schedule 1 of the BDAR waiver determination, the applicant will need to lodge a new BDAR waiver request or prepare a BDAR.

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

Yours sincerely

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

CPHR response on the EIS for the Mixed-use development with in-fill affordable housing – SSD-80432461

In preparing this advice CPHR has reviewed the following documents:

- *Environmental Impact Statement* (Ethos Urban, 12 June 2025) (EIS)
- *Flood Impact and Risk Assessment* (Telford Civil Consulting Engineers, 20 March 2025) (FIRA)
- *Powells Creek and Saleyards Creek Flood Study* (WMA Water, 17 November 2016).

Flood risk management

Key Assessment Issues

1	Flood risk	<p>The FIRA is based on floodwater depth and risk under baseline conditions and the post-development scenario of the site under an 1% annual exceedance probability (AEP) event. The impact has been analysed at the site and its adjoining areas by using the change in flood depth from baseline conditions to the post-development scenario. The site would be subject to flooding under existing and post-development conditions.</p> <p><u>Consideration of Powells Creek Catchment</u></p> <p>The FIRA does not consider the information from available studies for the Powells Creek Catchment. Flooding conditions, impacts and risks have not been reported (based on available studies) in the FIRA. The Powells Creek and Saleyards Creek Flood Study (WMA Water, 17 November 2016) is based on a comprehensive assessment of flooding conditions. The report includes maps outlining the flooding characteristics across the catchment, showing the site for the full range of flooding events including the probable maximum flood (PMF) event.</p> <p>Strathfield Council is in the process of finalising the Powells Creek Flood Risk Management Study and Plan. Council has flood maps under baseline conditions and the projected climate change scenarios based on the current risk management study. The proponent should review these flood maps and evaluate flooding risks at the site for the full range of flooding events including the PMF event.</p> <p><u>Consideration of climate change</u></p> <p>The site would have a floodwater depth of 0.5m under an 1% AEP event along with hazard levels of H3 and H4. The site would act as a flood storage under an 1% AEP event. The floodwater depth would increase by 0.2m under the projected climate change scenario of SSP2-4.5 by 2100 as outlined within Australian Rainfall an Runoff Version 4.2 (Commonwealth of Australia, Geoscience Australia, 14 May 2019).</p> <p>Under the PMF Event, the site would be surrounded by floodwater with a depth of 2m along with hazard levels of H5 and H6. The site would act as a floodway under the PMF event. The floodwater depth would increase by 0.3m in the PMF event under the climate change scenario of SSP2-4.5 in 2100. The site would become a low flood island and low trapped perimeter area under the Flood Emergency Response Classification during the PMF event.</p> <p><u>Consideration of proposed basement carpark</u></p> <p>The proposed development includes 4-5 storey basement carparks to service two 20-storey towers with 228 dwellings. These basement</p>
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		<p>carparks would likely be inundated under the PMF event. This may pose safety and life risks to drivers and users of these carparks.</p> <p>Recommended action:</p> <p>The FIRA should be updated based on completed studies and the study currently being finalised by Strathfield Council for the full range of flooding events including the PMF event.</p>
	<i>Extent and Timing</i>	Pre-determination

2	<i>Flood emergency and response planning and the compatibility of development</i>	<p>The Flood Emergency Response Plan (FERP) included in the FIRA is not supported. The FERP indicates that the flood emergency management activities would be undertaken by trained personnel and residents. The FERP does not outline the competency and capability of trained personnel. The proposed 20-storey towers would likely be managed by strata managers, who would be unlikely to be well-versed in flood emergency management, nor would future residents. This would pose considerable risks to the future residents of the proposed 228 dwellings.</p> <p>It would be difficult to evacuate the proposed towers prior to a major flooding event including the PMF event since the Powells Creek Catchment does not have a flood warning system. The site would be rapidly inundated following the onset of a major flooding event. Shelter-in-place would not be permitted for the site due to H5 and H6 hazard levels under the PMF event.</p> <p>The proposed development comprising 228 dwellings with commercial space at ground floor is not compatible with the flooding risks. The proposed development would result in the intensification of use on the site and therefore increase the population exposed to flood risk. The development would require significant resources from the emergency management services during major flooding events.</p> <p>Recommended action:</p> <ul style="list-style-type: none"> • The proponent should review the risk exposure at the site during major flooding events including the PMF event to demonstrate that the proposed development is compatible with the flood risk of the site • The development should demonstrate consistency with the NSW State Emergency Service existing emergency arrangement for the area.
	<i>Extent and Timing</i>	Pre-determination

End of Submission