

Our Ref: ID 3389  
Your Ref: SSD-76555711

7 October 2025

Edwina Ross  
Department of Planning, Housing & Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

Via Major Portal

email: edwina.ross@dpie.nsw.gov.au  
CC: helen.slater@ses.nsw.gov.au

Dear Edwina,

**State Significant Development Application for Mixed use with infill affordable housing 3-5  
Help Street, Chatswood**

Thank you for the opportunity to provide comment on the Response to Submissions for the State Significant Development Application for Mixed use with infill affordable housing 3-5 Help Street, Chatswood. It is understood that the proposed development seeks to construct a 33-storey shop-top housing development including:

- Site preparation works, including demolition of the existing buildings and structures and removal of trees on site.
- Construction of a three-storey podium comprising non-residential uses (Lower Ground Level to Level 1)
- Construction of a 32-storey residential tower above the podium comprising 160 residential apartments.
- Construction of a five-level basement that includes a total of 165 car parking spaces.
- Associated landscaping, public domain and site establishment works.
- Services and infrastructure improvements as required.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami 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 under the *Environmental Planning and Assessment Act, 1979*. We refer to our previous correspondence dated 10 July 2025

**In summary**, we recommend the Department of Planning, Housing and Infrastructure (DPHI):

- **Request clarification of the driveway crest height.** Page 32 of the Response to Submissions report (RTS) states “*at the location of the proposed vehicle access, the 1%AEP flood level is 91.40m and the PMF level is 93.54m. The report details that in this location it is not possible for the vehicle access ramp to be at the PMF level, due to the height above the roadway, and that the ramp level is set at 94.91m, which is above the 1%AEP +500mm level.*”<sup>1</sup> While both page 38 of the RTS<sup>2</sup> and the provided architectural plans show this at 91.91m AHD.<sup>3</sup> This is significantly lower than the PMF flood height at this location. Basement car parks pose significant risks to life and property. Basement car parking should be reconsidered for this location if protection up to the PMF is not possible.

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](mailto: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**

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<sup>1</sup> Mecone, 2025, Submissions Report, Matters Raised by Willoughby Council WCC-9.3, Page 32

<sup>2</sup> Mecone, 2025, Submissions Report, Matters Raised by Public Agencies CPHR-3, Page 38

<sup>3</sup> EM BE CE, 2025, Architectural Drawings, Public Domain Plan, Page 7