



Your ref: SSD-86017721
Our ref: DOC25/983021

Adela Murimba
Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

11 December 2025

Subject: Environmental Impact Statement - Residential development with in-fill affordable housing at 23-31 Dover Road, Rose Bay (SSD-86017721)

Dear Adela,

Thank you for your referral received 17 November 2025 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group regarding the above State significant development application located at 23-31 Dover Road, Rose Bay.

CPHR has reviewed the *Environmental Impact Statement – 23-31 Dover Road, Rose Bay* (Urbis, 27 October 2025) and supporting documentation and provides comments and recommendations at Attachment A.

In summary:

- the *Flood Impact and Risk Assessment – 21-31 Dover Road, Rose Bay* (FIRA) is inadequate, and CPHR recommends that a site-specific flood study and revised FIRA be prepared
- the development is consistent with the Biodiversity Development Assessment Report (BDAR) waiver granted by CPHR on 18 July 2025. 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 at peter.braga@environment.nsw.gov.au.

Yours sincerely,

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

CPHR advice on EIS - Residential development with in-fill affordable housing at 23-31 Dover Road, Rose Bay (SSD-86017721)

In preparing this advice, CPHR has reviewed the following documents:

- *Environmental Impact Statement – 23-31 Dover Road, Rose Bay* (Urbis, 27 October 2025)
- *Flood Impact and Risk Assessment – 21-31 Dover Road, Rose Bay* (Catchment Simulation Solutions, 11 September 2025) (FIRA).

Flooding

Key Assessment Issues

1	<i>The FIRA does not assess offsite impacts of the development</i>	The FIRA has been based on the <i>Rose Bay Floodplain Risk Management Study and Plan</i> (WMA Water, 2014) (Rose Bay Flood Study and Plan). The Rose Bay Flood Study and Plan (prepared for Council) assumes that future development would stop water from public land from entering private property. The Rose Bay Flood Study and Plan therefore shows no flood water on private land and confines all flows to public property and roadways. This illustrates worst case flood levels and hazards on public roads however does not reflect the true flood behaviour where flood waters do enter private land. The proposed development has a large impervious footprint and proposes changes to site topography and flow paths including taking preventative measures to keep flow on the roadway. This will change the existing flood behaviour and has the potential to impact properties both upstream and downstream of the site. The Rose Bay Flood Study and Plan indicates that properties downstream of the site are already subject to over floor flooding in frequent events. Based on the provided FIRA, the subject development is likely to have adverse offsite impacts which have not been mitigated. Given the above, the Rose Bay Flood Study and Plan is not adequate to inform the FIRA for the subject development. Recommended action: 1. A new site-specific flood study be prepared in accordance with Understanding and managing flood risk: Flood risk management guideline FB01 (DPE, 30 June 2023). The study must incorporate an extended area to include upstream, downstream and adjacent properties. 2. The new flood study must be used in the preparation of a revised FIRA.
	<i>Extent and Timing</i>	Pre-determination

2	<i>The FIRA does not provide any risk mitigation advice for offsite impacts</i>	The submitted FIRA states that there will be no off-site impacts based on the Rose Bay Flood Study and Plan. For the reasons outlined at Key Assessment Issue 1 above, it is considered that adverse impacts will occur on adjacent properties and these impacts will require mitigation. Recommended action:
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		A revised FIRA must be prepared in accordance with the requirements of Flood impact and risk assessment: Flood risk management guideline LU01 (DPE, 30 June 2023).
	<i>Extent and Timing</i>	Pre-determination

3	<i>Flood planning requirements</i>	The findings of the Rose Bay Flood Study and Plan have been used to set flood planning levels and floor levels for the development. These levels are based on flows on the adjacent roadway only and may not be reflective of risks arising from overland flows. Recommended actions: • Update flood planning requirements for the development from offsite flooding sources other than the roadway • Ensure that overland flow from adjoining properties is not obstructed by the development.
	<i>Extent and Timing</i>	Pre-determination

4	<i>Emergency management measures</i>	The Rose Bay Flood Study and Plan Flood Study shows high hazard flooding is likely in parts of Dover Road. Recommended action: Assess the development against the Shelter in place guideline for flash flooding (DPHI, January 2025).
	<i>Extent and Timing</i>	Pre-determination

End of Submission