



Prity Cleary
Senior Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

4 May 2026

Subject: Request for Additional Information – Residential Flat Building with Infill Affordable Housing at 24, 26 and 28 Middle Harbour Road, Lindfield (SSD-82548708)

Dear Prity,

Thank you for your referral received 14 April 2026 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group on the Request for Additional Information (RFI) for this State Significant Development (SSD-82548708) located at 24, 26 and 28 Middle Harbour Road, Lindfield.

CPHR has reviewed the *Response to Request for Additional Information – SSD-82548708* (Willowtree Planning, 14 April 2026) (RFI Response) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- Flooding – the RFI response does not adequately address CPHR's previous advice regarding flood impacts on adjoining properties and inundation of the basement car park
- Biodiversity – the *Second Amended SSDA Arboricultural Impact Assessment* (Lee Hancock Consulting Arborist, 13 April 2026) adequately addresses all issues previously raised.

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

Yours sincerely,

Dana Alderson
**A/Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR advice on RFI - Residential Flat Building with Infill Affordable Housing at 24, 26 and 28 Middle Harbour Road, Lindfield (SSD-82548708)

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

- *Response To Request for Additional Information – SSD-82548708* (Willowtree Planning, 14 April 2026) (RFI Response)
- *Civil Engineering Statement – Response to CPHR RFIs* (Xavier Knight, 8 April 2026) (Civil Engineering Statement)
- *24-28 Middle Harbour Road, Lindfield – Flood Impact Risk Assessment* (WMS, 10 December 2025) (FIRA).

Flooding

Key Assessment Issues

The numbers in the table below correspond with CPHR's previous Key Assessment Issues table.

7	Flood impact risk assessment (FIRA) model verification	<p>The proposed use of the 0.2% annual exceedance probability (AEP) flood level as determined by the FIRA to comply with Council's 1% AEP flood level may be acceptable.</p> <p>Recommended action:</p> <p>Flood planning levels across the site should be identified and documented in the FIRA (m AHD) for completeness.</p>
	<i>Extent and timing</i>	Prior to determination.
8	Impacts of the development on adjacent properties in extreme flood events	<p>The Civil Engineering Letter refers to clause 4 of Section 24D.2 of the <i>Ku-ring-gai Development Control Plan</i> which is relevant to planning and development controls up to the probable maximum flood (PMF). As such, the Civil Engineering Letter has not addressed the adverse impacts on adjacent properties due to the development.</p> <p>As previously advised, the adverse impacts on neighbouring properties are significant. In the PMF flood depths increase up to 1.0m at 22 Middle Harbour Road, 0.30m at 15 Russell Avenue, and up to 0.70m at 17 Russell Avenue.</p> <p>The principles of the Flood Risk Management Manual (DPE, June 2023) emphasise the effective management of flood risk. This includes limiting increases in flood risk to the existing community due to decisions to place new development in flood prone areas.</p> <p>Recommended action:</p> <p>The impacts of the development on flood behaviour and the risks to the existing community must be identified and addressed for the full range of flooding.</p>
	<i>Extent and timing</i>	Prior to determination.
9	Emergency management consideration in significant flood events	<p>The RFI Response and Civil Engineering Letter does not address the potential inundation of the basement car park.</p> <p>Emergency management planning needs to consider current flood behaviour for the full range of events, including the PMF. Therefore, the protection of the basement for the full range of flooding should be</p>

		<p>considered for all openings and vents that allow water to flow into the basement, preferably by utilising passive measures.</p> <p>Recommended action:</p> <p>The FIRA should address the measures proposed to protect the basement car park from inundation.</p>
	<i>Extent and timing</i>	Prior to determination.

End of Submission