

Preliminary Flood Impact Report – Proposal for new Crown Cemetery in Lidcombe

October 2025

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1. Introduction

In August 2025, The NSW Government's Metropolitan Memorial Parks (MMP) identified Carnarvon Golf Course, located at 65-95 Nottinghill Road, Lidcombe, as the preferred site for redevelopment into a new Crown cemetery. In response, Cumberland City Council resolved at the Ordinary Council Meeting of 27 August 2025:

"That the General Manager take necessary action to develop a submission on behalf of Cumberland Council opposing the creation of a cemetery on the site of Carnarvon Golf Course."

This research outlines the potential flood impacts associated with the redevelopment of the site. Key concerns are that Council remains unsatisfied that a thorough study has been conducted regarding potential flooding events on the site to ensure this sensitive use is suitable.

1.1 SITE IDENTIFICATION AND DESCRIPTION

Site identification details are summarised in Table 1. The location and layout of the site is shown in Figures 1.

Site Address:	65-96 Nottinghill Road, Lidcombe NSW
Site Area:	459,911 sqm (approximately 45 hectares)
Current Zoning:	RE1 Public Recreation
Current Land Use:	Golf Course

The subject site is approximately 45 hectares and is located at 65-96 Nottinghill Road, Lidcombe, within the Cumberland local government area. Zoned RE1 Public Recreation under the Cumberland Local Environmental Plan (LEP) 2021, the site is currently operating under a lease issued by Council in our capacity as Crown land manager for the use of the site as a golf course. The location and boundary extent can be seen in Figure 1.



Figure 1: Map showing the site boundary of Carnarvon Golf Course (Nearmap, 2025)

A desktop review of the current surrounding land uses are as follows:

- North – Georges Avenue, and low density residential dwellings
- South – Amy Street, followed by the railway line and low density residential dwellings.
- East – Joseph Street, followed by the NSW Forensic Medicine and Coroners Court Complex and low density residential dwellings.
- West – Nottingham Road, followed by low density residential dwellings.

1.2 HISTORICAL USES

Through historical aerial photograph review, the subject site appears to be under different land uses overtime. In summary, the following key land uses were found:

- 1940s – The area was occupied by residential dwellings, paddocks and ovals
- 1950s to 1970s – The area was occupied by denser residential dwellings and playing fields
- 1980s to 1990s – Some non-residential buildings were developed adjacent to the south-east corner of the subject site

2. Preliminary Flood Impacts

2.1 CURRENT FLOOD RISK

The subject site, located at 65–95 Nottingham Road, Lidcombe, has been identified as flood-affected within the 1% Annual Exceedance Probability (AEP) event, based on information available to Council. Accordingly, the site is subject to assessment against the relevant flood-related development controls under the Cumberland Development Control Plan (DCP) and the Flood Risk Management Development Manual.

Current mapping shows that a significant percentage of the site is designated as having some level of flood risk. Of particular concern, is the concentration of flood risk in the middle and northern region of the site, as shown below in Figure 2.



Figure 2: Flood map showing level of flood risk (Cumberland City Council, 2025)

2.2 EXISTING FLOODING CONSIDERATIONS

2.2.1 Haslams Creek Overland Flood Study

The subject site is shown to be affected by the 1% AEP flood, according to the information available to Council from the “Haslams Creek Overland Flood Study” prepared by Royal HaskoningDHV in March 2016.

The 1% AEP flood level refers to a flood which has a 1% chance of being equalled or exceeded in any one year and this site has been assessed as **a low, medium and high flood risk**. It should be noted that a flood could occur that is more severe than the 1% AEP flood at any time. The maximum 1% AEP flood level relevant to the subject property has been determined to Australian Height Datum (AHD) as shown in Figure 2 as follows:

1. At location A - 22.1 mAHD
2. At location B - 24.2 mAHD
3. At location C - 25.3 mAHD
4. At location D - 26.4 mAHD
5. At location E - 27.8 mAHD
6. At location F - 29.1 mAHD
7. At location G - 30.8 mAHD
8. At location H - 32.5 mAHD
9. At location I - 34.1 mAHD
10. At location J - 36.0 mAHD
11. At location K - 40.2 mAHD

2.2.2 State Environmental Planning Policy (Exempt and Complying Development) 2008

The subject property has been identified as a flood control lot. Under the SEPP (Exempt & Complying Development) 2008, Regulation 3.5(1), a Complying Development Certificate must not be issued for, “Development under this code must not be carried out on any part of a flood control lot, other than a part of the lot that the council or a professional engineer who specialises in hydraulic engineering has certified, for the purpose of the issue of the relevant complying development certificate, as not being any of the following:

- a) a flood storage area,
- b) a floodway area,
- c) a flow path,
- d) a high hazard area,
- e) a high risk area.

Council has determined that part of the flood control lies in one of the five items above – **items A, B, C, D and E**; therefore, a CDC cannot be issued on this site. The identified flood items are represented by the darker area within the 1% AEP flood extent on the attached map. If the development is proposed within any part of this zone, a pre and post flood study must accompany the Development Application. Alternatively, if the development is proposed within the flood fringe zone, a CDC may be considered for this site. However, the surface flows must not be impeded (blocked) and the redevelopment shall allow the free movement of the flood around any proposed structure(s).

In all cases, flood level on adjacent properties shall not be increased. Supporting documentation is to accompany the development, which in this instance has not been provided by MMP.

2.2.4 Cumberland Development Control Plan (DCP) 2021

The Cumberland DCP 2021 further outlines flood risk management provisions that align with the objectives of the Cumberland LEP 2021 and the NSW Government's Flood Prone Land Policy. The DCP emphasises a risk-based approach to development on flood-prone land, aiming to minimise the impacts of flooding events. Key flood risk management considerations in the Cumberland DCP include:

- **Site-Specific Flood Assessment:** Development on land identified as flood-affected must be supported by a flood impact assessment or hydraulic report prepared by a qualified engineer. This ensures that the proposal is compatible with the flood characteristics of the site.
- **Design and Siting Controls:** Buildings and infrastructure must be designed to withstand flood events, with minimum floor levels set above the defined flood level (typically the 1% Annual Exceedance Probability, or AEP, flood level plus freeboard). The DCP also encourages the use of flood-resilient materials and construction techniques.
- **Evacuation and Emergency Access:** Developments must demonstrate safe evacuation routes and access for emergency services during flood events. This includes ensuring that ingress and egress points remain accessible during floods.
- **No Adverse Impact:** Proposals must not increase flood risk to surrounding properties or alter flood behaviour in a way that worsens conditions elsewhere. This includes managing stormwater runoff and ensuring that fill or structures do not obstruct overland flow paths.
- **Climate Change Consideration:** The DCP requires that flood planning account for projected changes in rainfall intensity and sea level rise, ensuring long-term resilience.

In this instance, it should be noted that development of flood-affected vacant land also represents an intensification of land use, which is inconsistent with the objectives of the Cumberland DCP and the Flood Risk Management Development Manual. These controls are particularly important for sensitive land uses such as cemeteries, where groundwater interaction, surface water management, and long-term site stability must be carefully addressed.

Preliminary consideration of the abovementioned risk factors and planning controls do not appear to have been considered in the proposal for a cemetery.

2.3 IMPACTS ON FUTURE DEVELOPMENT OF THE SITE

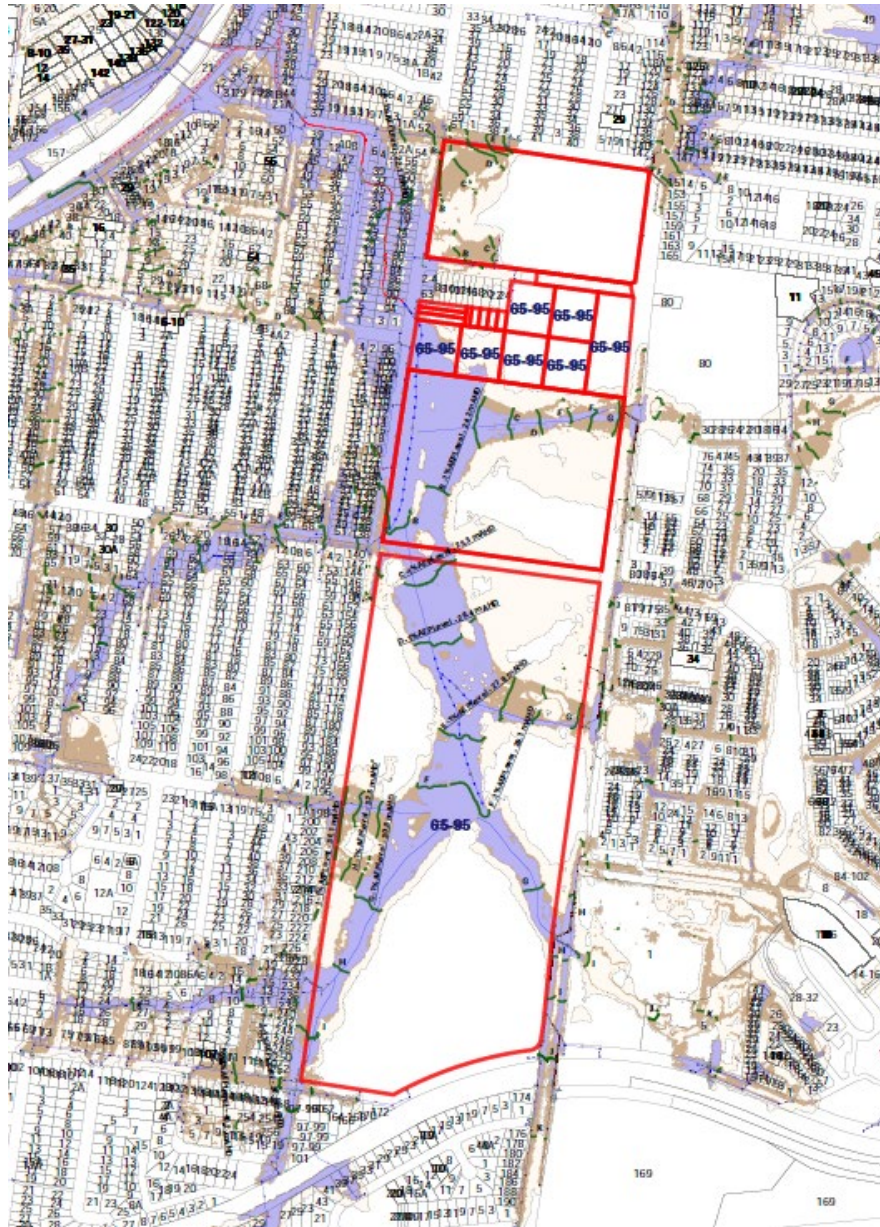


Figure 3: Flood map showing flood waters in and around the subject site (Cumberland City Council, 2025)

The purple shaded area in Figure 3 represents areas where flooding is expected to occur. The brown shaded area in Figure 3 represents the flood waters with a depth of flow less than 100mm and does not attract any flood controls. It is presented on the flood map to show the continuity of flooding within the area. However, if development occurs within the brown areas, the structure shall not impede or divert flows to adjacent properties.

The effects of flooding events impacting a cemetery site has the potential to have detrimental planning and environmental impacts. Flood impact assessments must be required to ensure that burial sites are located above the flood planning level and incorporate resilient design features. Proper drainage, elevated burial platforms, and emergency access routes are essential to mitigate flood risks and protect public health, water quality, and long-term site stability if this proposal is pursued.

It is recommended that future flood modelling (pre and post development flood study) be calibrated to Council's 1% AEP Flood levels (or interpolated levels) at least 10 metres upstream and downstream from the property boundaries.

Council's TUFLOW model for the catchment is available and recommended to be used to undertake the assessment. Once engaged, the consultant must enter into a license agreement for the use of Council's flood model for the specific purpose of preparing the FIA for the proposed development. In cases where uses of the TUFLOW model proves impractical, using an alternative 2D model is advised for the FIA preparation.

3. Conclusion

The proposed redevelopment of Carnarvon Golf Course into a new Crown cemetery presents significant flood risk, as outlined in the Cumberland LEP 2021 and supported by regional and local flood mapping and planning controls. Given the potential for flooding, compromised grave integrity, and potential contamination during flood events, the site is not considered suitable for cemetery development.

The sensitive nature of burial infrastructure demands stable, well-drained land with minimal flood hazard, and this location does not meet those criteria. Therefore, alternative sites with lower flood exposure should be prioritised to ensure public safety, environmental protection, and long-term operational viability.