



Lachlan Hutton
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Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

11 February 2026

Subject: Environmental Impact Statement - Mixed-use development, 307-315 Parramatta Road, Leichardt (SSD- 83721209)

Dear Lachlan,

Thank you for your referral received 3 December 2025 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group on the Environmental Impact Statement (EIS) for this State significant development.

CPHR has reviewed the *Housing Delivery Authority Concurrent Rezoning + Environmental Impact Statement* (Think Planners, 7 November 2025) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- Flooding – the proposal significantly increases flood risk and residential exposure because the only access road is frequently subject to high-hazard flooding, undermining safety, amenity, and compliance with relevant directions and guidelines. Safe and reliable vehicle and pedestrian access must be demonstrated before the development can be supported. Additionally, the FIRA predicts off-site flood increases above acceptable limits on already vulnerable properties, indicating a need for mitigation or stronger justification.
- Biodiversity – the development is consistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 9 June 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,

Kerry Richardson
Director, Conservation Planning and Assessment
Conservation Planning and Offsets
Conservation Programs, Heritage and Regulation Group

CPHR advice on EIS - Mixed-use development, 307-315 Parramatta Road, Leichardt

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

- *Housing Delivery Authority Concurrent Rezoning + Environmental Impact Statement* (Think Planners, 7 November 2025)
- *Flood Impact & Risk Assessment* (Mott Macdonald, 7 October 2025) (FIRA).

Flooding

Key Assessment Issues

<p>1</p>	<p><i>Safe and reliable access</i></p>	<p>High density residential development on this site will significantly increase flood risk as the only vehicle access is susceptible to frequent and high-hazard flooding.</p> <p><u>Amenity of future residents</u></p> <p>Residents will not have reliable access to their homes as Redmond Street is susceptible to high hazard flooding, even in minor flood events.</p> <p>The 10% flood hazard on Redmond Street is estimated to reach a H5 classification, creating life threatening conditions for people and vehicles attempting to enter or leave the site.</p> <p>The loss of reliable access adversely impacts social amenity as it disrupts the convenience and safety of day to day living. Such disruptions are unlikely to meet reasonable expectations for residential amenity, particularly for a high-density residential development.</p> <p>CPHR considers that the minimum acceptable level of flood immunity for a major residential development access road is that the road remains trafficable, the Hazard classification not exceeding H1, during a 1% annual exceedance probability flood event under climate change conditions.</p> <p><u>Risk of future government expenditure</u></p> <p>The proposal does not meet the standards set out in the Local Planning Directions – Section 4.1 Flooding, which seeks to avoid development outcomes that are likely to result in significant additional government expenditure on flood mitigation and emergency response.</p> <p>The very low flood immunity of the only vehicular access via Redmond Street is unlikely to be acceptable to future residents, who could reasonably be expected to pressure or request government to improve access reliability. Any works to raise or otherwise improve the flood immunity of Redmond Street would involve substantial cost due to the constrained urban environment and the highly flood-prone nature of surrounding roads.</p> <p>This constraint is acknowledged in the FIRA, which notes that options to reduce or eliminate flood hazard in the vicinity of the site are not feasible due to the risk of increasing flood impacts elsewhere, particularly downstream.</p> <p><u>Risk to life</u></p> <p>The proposed change of use from predominantly commercial uses to residential, significantly increasing both the population and duration of occupancy of people on the site.</p> <p>The combination of increased residential density and frequent high-hazard access conditions will increase risk to life when compared with existing site uses.</p> <p>The FIRA asserts that shelter-in-place is a viable emergency management strategy on the basis that all habitable floors are above the probable</p>
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		<p>maximum flood. However, the proposal significantly increases the likelihood of people interacting with high-hazard floodwaters, particularly when attempting to access or leave the site during flood events.</p> <p>The assessment is also inconsistent with contemporary best-practice guidance, including the Shelter-in-place Guideline for Flash Flooding (NSW DPHI, January 2025), which requires surrounding road hazards to be considered when evaluating the suitability of shelter-in-place strategies.</p> <p><u>Significant increase in the dwelling density of land within the flood planning area</u></p> <p>The proposed addition of approximately 154 dwellings would substantially increase both the number of people and the frequency with which people are exposed to high-hazard flood conditions. This level of intensification does not meet the intent or objectives of the Local Planning – Section 4.1 Flooding which discourages residential development in high-hazard flood areas or significant increases in dwelling density within flood-affected land.</p> <p>While the FIRA recognises that the proposal would result in a significant intensification of residential density within the flood planning area, it attempts to justify this outcome by referencing broader housing supply objectives. This justification is inappropriate and does not adequately address the associated planning and flood risk considerations.</p> <p>Recommended action:</p> <p>Demonstrate reliable and safe access can be achieved for both vehicles and people.</p>
	<i>Extent and timing</i>	Pre-determination
2	<i>Off-site adverse flood impacts above acceptable limits</i>	<p>The FIRA predicts off-site flood level increases of approximately 25–50mm on nearby private properties. These increases exceed the generally accepted impact thresholds of ≤10mm. The FIRA justification is that the affected land already experiences significant flooding.</p> <p>CPHR does not accept that increasing both the depth and frequency of flooding above accepted thresholds on properties that are already highly vulnerable is justifiable.</p> <p>Further, the FIRA suggests that some of the predicted off-site impacts may be “artificial” due to building representation limitations within the adopted flood model. This assertion raises concerns regarding the reliability and suitability of the model for development assessment purposes.</p> <p>Recommended action:</p> <p>Identify and assess feasible mitigation options to limit off-site flood level increases to 10mm or justify why greater impacts are acceptable.</p>
	<i>Extent and timing</i>	Pre-determination

End of Submission