



Your ref: SSD-31179510
Our ref: DOC25/1094210

Tia Mills
Social and Diverse Housing Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

5 February 2026

Subject: Response to Submissions Amendment Report – Gregory Place Build-to-Rent located at 2A Gregory Place, Harris Park (SSD-31179510)

Dear Tia,

Thank you for your referral received 16 January 2025 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group on this State significant development (SSD- 31179510).

CPHR has reviewed the *Amendment report - SSD Affordable housing and build to rent Concept development application 2A Gregory Place, Harris Park* (Pacific Planning, 13 December 2025) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- Flooding – The Secretary's environmental assessment requirements have not been satisfied. CPHR highlights that City of Parramatta Council (Council) previously objected to the development, citing flooding as a major concern, supported by issues raised by the NSW SES.

Key unresolved matters include the need for refinement of the flood model in consultation with the Council, assessment of the full range of flooding scenarios, including the Parramatta River Probable Maximum Flood (PMF), and detailed consideration of the suitability of the land for residential use. Additional work is also required to assess structural integrity, emergency management arrangements, and the appropriateness of relying on shelter-in-place during flash flooding.

- Biodiversity – the development is consistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 24 September 2025. If the proposed development is changed prior to approval 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,

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

CPHR advice on RTS Amendment Report - Gregory Place Build-to-Rent located at 2A Gregory Place, Harris Park (SSD-31179510)

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

- *Amendment report - State significant development Affordable housing and build to rent Concept development application 2A Gregory Place, Harris Park* (Pacific Planning, 13 December 2025)
- *Updated Flood Assessment* (GRC Hydro, 31 July 2025)
- *Flood Emergency Response Plan* (GRC Hydro, 19 December 2024) (FERP).

Flooding

Key Assessment Issues

1	<i>Flood modelling</i>	The Updated Flood Assessment has used GRC's own flood model of Clay Cliff Creek for the site, noting issues with the City of Parramatta Council's (Council) adopted model. The comments made by GRC on Council's model do not appear reasonable. CPHR finds it concerning that the resultant flood mapping appears to have all but removed 1% Annual Exceedance Probability (AEP) flooding from the floodplain mapped in several previous studies. CPHR considers it unlikely that the Clay Cliff Creek stormwater channel was designed for or has the capacity to fully convey the 1% AEP flood. Therefore, GRC's flood model warrants further review and verification in consultation with Council. The Updated Flood Assessment states that the Council model includes an error, where a subcatchment is duplicated. The Updated Flood Assessment then states that there is a greater flow in Clay Cliff Creek in GRC's model than would be in Council's model without the duplicated subcatchment. However, no further comparisons have been made by GRC between the two models. Detailed map and level comparisons should be made. Alternatively, Council's model may be used with recommended amendments such as removing the extra subcatchment and changing the channel from 2D to 1D as suggested by GRC. The assumption of 100% blockage of pits and pipes in the model is not considered to be a reasonable representation of real world conditions. The approach to pit and pipe blockage should be refined in consultation with Council. The pedestrian footbridge upstream of the site has been excluded on the basis that it is above the 1% AEP flood level. As a minimum, it should be included in the PMF model. Australia Rainfall and Runoff (ARR) blockage assessment should also be undertaken. Climate change modelling should be undertaken because of the latest available guidance, which is the Australian Rainfall and Runoff Version 4.2 (Commonwealth of Australia, May 2019). Flood behaviour and therefore flood modelling will impact on flood planning controls and emergency management considerations for the proposed development. Recommended action: Update the flood assessment with revised modelling in accordance with the comments above. Flood planning controls and emergency management considerations will need to be updated once Council and CPHR are satisfied with the model.
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	<i>Extent and Timing</i>	Pre-determination
2	<i>Flood impacts</i>	PMF impacts have not been mapped as required. Recommended action: Map and discuss flood impacts in the PMF separately for the Clay Cliff Creek and the Parramatta River.
	<i>Extent and Timing</i>	Pre-determination
3	<i>Flood risk</i>	While the FERP has used results of Council's Parramatta River Flood Study (Stantec, 13 June 2024) for the Parramatta River PMF, the Updated Flood Assessment has not presented mapping or discussion of Parramatta River PMF. The site is currently used for industry, and the proposal is for residential development. Given the highly constrained nature of the site, detailed consideration should be given to the suitability of the site for residential use. Residential use carries a higher flood risk profile than employment uses including longer and overnight occupation and the potential higher vulnerability of occupants such as children. Industrial facilities can close early before a flood and can be evacuated more easily. Recommended action: • Provide mapping and discussion of Parramatta River PMF and how it impacts use of the site. • Provide detailed consideration as to the suitability of the site for residential development.
	<i>Extent and Timing</i>	Pre-determination
4	<i>Structural adequacy</i>	High hazard flooding in extreme events would risk structural failure. All structures are considered subject to failure in H6 hazard flooding. Therefore, the ability of occupants to remain in the building during and after extreme flood events would be compromised. Details on structural adequacy while sheltering in place in an H6 hazard flash flood environment should be provided. Recommended action: Provide preliminary information on structural adequacy, including how building design responds to the site-specific hazards and the consequences of a PMF on structural integrity.
	<i>Extent and Timing</i>	Pre-determination
5	<i>Emergency management</i>	A Flood Impact and Risk Assessment (FIRA) is the primary flood-related document used to inform development assessment. All discussion informing the suitability of the proposed development for approval/consent should be

	presented in a FIRA or in this case, the Updated Flood Assessment. A FERP may then be used to support a development once it is approved and should not contain information for planning assessment that is not relevant to ongoing implementation of the FERP. The Updated Flood Assessment needs to consider the Parramatta River PMF and not only the Clay Cliff Creek PMF in emergency management. CPHR is aware of information showing durations of inundation longer than 12 hours in the vicinity of the subject site due to long duration flooding in the Parramatta River. Long duration PMF modelling should be undertaken to ascertain the likely length of isolation if sheltering in place is to be adopted. Basement car parking is not recommended where sheltering in place is proposed. The basement is proposed to have passive protection to 5.1m Australian Height Datum (AHD), which is only 0.2m above GRC's modelled 1% AEP flood level. A gate is then proposed to 5.85m AHD to protect from creek flooding, but the basement is not protected against riverine flooding. This is considered unacceptable for a development where sheltering in place is proposed. The proposed arrangement would create an unnecessary and unacceptable risk to life. The <i>Shelter-in-Place guideline for flash flooding</i> (NSW DPHI, January 2025) should be used to assess the suitability of sheltering in place for this development. The risks associated with sheltering in place with surrounding high hazard flooding need detailed consideration to inform the emergency management strategy. The SES should be consulted for detailed advice. Recommended action: Update the flood assessment to address the following emergency management points: • Consider longer storm durations for the riverine PMF. • Reconsider basement car parking if sheltering in place is proposed. • Reconsider flood gates. • Use the <i>Shelter-in-Place guideline for flash flooding</i> to assess the suitability of sheltering in place for this development. Consider in detail the risks of sheltering in place in an H6 hazard flash flood environment. • Consultation the NSW SES.
<i>Extent and Timing</i>	Pre-determination

End of Submission