

Our Ref: ID 3585  
Your Ref: SSD-31179510

15 January 2026

Tia Mills  
Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

email: tia.mills@dpie.nsw.gov.au  
CC: claire.flashman@ses.nsw.gov.au

Dear Tia Mills,

**Advice on Amended Report State Significant Development Application Gregory Place  
Build-to-Rent SSD-31179510**

Thank you for the opportunity to provide additional advice on the State Significant Development Application for Gregory Place Build-to-Rent at 2A Gregory Place, Harris Park, NSW. It is understood that the project is enabled by a Site Compatibility Certificate (SCC) for a building for the purpose of an affordable housing scheme. Although the site is zoned Industrial, the SCC enables residential development to facilitate the social benefits associated with affordable housing. The project includes approximately 320 build-to-rent dwellings,<sup>1</sup> however we note the Environmental Impact Statement includes 483 dwellings across three (3) freestanding buildings that vary in height from 4-8 storeys.<sup>2</sup>

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami in NSW. This role includes planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

We recommend flooding issues are considered in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines, including the Support for Emergency Management Planning and relevant planning circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including 4.1 Flooding and PS24-001.

We refer to our previous correspondence dated 29 August 2022 and emphasise that **intensifying development on land below the Flood Planning Level (FPL) will pose a**

<sup>1</sup> GRC Hydro. 2025. Updated Flood Assessment, page 1

<sup>2</sup> Pacific Planning. 2022. Build To Rent Concept Development Application Environmental Impact Statement, page v

significant increase in risk to life, particularly where there are existing evacuation constraints.

In summary, we:

- **Recommend** clarifying the proposed dwelling yield of this development.
- **Note** the GRC Hydro changes to the Council-provided modelling,<sup>3</sup> and **advise seeking advice** from Parramatta City Council and the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) in relation to the modelling approach, and the impact of the proposed development on flood behaviour at the site and adjacent areas. **If the flood risks are not clearly and fully outlined and understood then they cannot be appropriately managed/mitigated**, as this is critical in developing appropriate building design, flood mitigation measures and emergency management strategies for the site.
- The Flood Impact and Risk Assessment (FIRA), developed in accordance with the NSW Government Guidelines, should include:
  - consideration of flooding from any source and coincident flooding, for the full range of flooding events up to and including the PMF event;
  - flood risks at the site and access/egress roads (including any proposed internal roads and the broader road network), and any risk of isolation. The analysis of the impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand the isolation risks and evacuation constraints.
  - time to onset, duration of inundation, depth, velocity and hydraulic hazard of any flooding;
  - impacts of the development on flood behaviour at the site, neighbouring and downstream properties (pre- and post-development conditions);
  - consideration of climate change impacts, in line with NSW Government guidelines.
- **Emphasise** that the strategy of isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation, and it should not be used to justify *future development* in high hazard areas. The consent authority should request the proponent to **demonstrate consistency** with the [Shelter in Place Guideline](#) **prior to granting consent**, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing (not limited to) the following:
  - detailed assessment of evacuation off-site (the primary emergency management strategy) to determine that evacuation off-site is not achievable. (7)
  - the flooding occurs within less than 6 hours from the commencement of causative rain and the duration of shelter in place due to isolation by floodwaters is less than 12 hours from the commencement of rainfall (8b)

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<sup>3</sup> GRC Hydro. 2025. Updated Flood Assessment, page 5 - 11

- development is **not subject to high hazard flooding** (e.g. floodways, high hazard H5 or H6 areas) or surrounding roadways are not subject to high hazard flooding. (8c)
- **how** shelter in place will be used as part of the site's emergency management response and communicated to occupants (9)
- an understanding of the **secondary risks** and how the proponent proposes they will be managed is outlined in the FIRA. Secondary risks include medical emergencies, building fire, health and wellbeing. (10)
- **demonstrate** that any proposed refuge location is above the height of the PMF and aligns with the design criteria in the Guideline<sup>4</sup> and the Red Cross Preferred Sheltering Practices for Emergency Sheltering in Australia,<sup>5</sup> including water supply, waste management, sanitation, food, and shelter and space management.
- **Note** a Flood Emergency Response Plan<sup>6</sup> has been submitted; however, we **recommend** the flood emergency response strategy is developed once flood risks are clearly understood based on a robust Flood Impact and Risk Assessment (FIRA), and therefore it should be reviewed and updated once the FIRA is resubmitted. We **emphasise** that private flood emergency management plans alone are insufficient to address flood at the site. Also, **the NSW SES does not have statutory authority to endorse or approve flood emergency response plans.**

Should the development progress, despite the flood risks not being clearly understood, we further recommend:

- Building design that considers the potential flood and debris loadings of the PMF, that can be significant up to H6 at this site, so that structural failure is avoided during a flood.
- The basement is passively protected from events up to and including the PMF, ensuring that all openings to the basement (ramp, vents, etc.) are situated above the PMF as a condition of consent. If this is not feasible reconsider basement carparking as any openings to the basement below the PMF will pose risk to life and property. The installation of retractable flood gates is not an appropriate measure to manage risk to life in the event of a flood as it is reliant on external factors such as human intervention, electricity source, etc., we therefore recommend requesting the proponent investigate alternative mitigation measures.

You may also find the following Guidelines on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)

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<sup>4</sup> NSW Department of Planning, Housing and Infrastructure. 2024. Shelter-in-place guideline for flash flooding, page 5

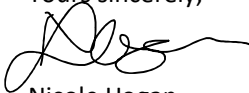
<sup>5</sup> Smith, C., and Parsons, C. 2015. Preferred Sheltering Practices for Emergency Sheltering in Australia. Retrieved from <https://www.redcross.org.au/globalassets/cms-assets/documents/emergency-services/2015-preferred-sheltering-practices-for-emergency-sheltering-in-australia.pdf>

<sup>6</sup> GRC Hydro. 2024. Flood Emergency Response Plan – 2A Gregory Place, Harris Park, Revision A Report

- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Further information is outlined in Attachment A. Please feel free to contact Ana Chitu via email at [rra@ses.nsw.gov.au](mailto:rra@ses.nsw.gov.au) should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nicole Hogan', with a long horizontal flourish extending to the right.

Nicole Hogan

Assistant Commissioner, Director Emergency Management  
**NSW State Emergency Service**

## **ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>7</sup>**

**Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.**

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan<sup>8</sup> and the Parramatta LGA Flood Emergency Sub Plan,<sup>9</sup> where evacuation is the preferred emergency management strategy for people impacted by flooding.

**Principle 2 Decisions should be informed by understanding the full range of risks to the community.**

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

It is noted that the site itself is subject to mainstream flooding of the Parramatta River, creek flooding from the channelised Clay Cliff Creek which runs along the southern boundary and through the site, as well as overland flow flooding.<sup>10</sup> The Parramatta River Flood Study suggests that the site itself (the area surrounding the existing building) becomes almost entirely inundated in a 20% Annual Exceedance Probability (AEP) event, with fairly shallow flooding to the east and higher depths of up to 0.7 metres in the western part and in excess of 1.5 metres within the creek channel.<sup>11</sup>

It is unclear if the modelling provided includes flooding from all sources, however there appears to be a discrepancy between the Parramatta River Flood Study flood extent, showing the entire site (around the existing building) as well as all surrounding roads to the north east and west completely inundated by flood depths in excess of 1.5 metres and H5 – H6 flood hazard level<sup>12</sup> in a Parramatta River PMF event, while the modelling provided in the Updated Flood Assessment suggests the area to the north to be flood free in a PMF event and lower hazard,<sup>13</sup> suggesting this modelling may have Clay Cliff Creek flooding as the dominant feature and may not fully reflect mainstream flooding of the Parramatta River. The Study shows that a significant part of the site (surrounding the existing building) is categorised as floodway in the 1% AEP event,<sup>14</sup> and in a PMF the area within the site surrounding the existing building, as

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<sup>7</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>8</sup> NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

<sup>9</sup> NSW SES. 2021. Parramatta LGA Flood Emergency Sub Plan, Section 1.6.2, page 7

<sup>10</sup> GRC Hydro. 2025. Updated Flood Assessment, page 1 & 14

<sup>11</sup> Stantec. 2024. Parramatta River Flood Study, Appendix F, Figure F2.29

<sup>12</sup> Stantec. 2024. Parramatta River Flood Study, Appendix F, Figure F6.29 & Appendix H, Figure H6.29

<sup>13</sup> GRC Hydro. 2025. Updated Flood Assessment, page 16

<sup>14</sup> Stantec. 2024. Parramatta River Flood Study, Appendix I, Figure I5.29

well as the surrounding road network providing access to the site are categorised as floodway.<sup>15</sup>

We recommend seeking advice from Parramatta City Council and the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) in relation to the modelling approach and the impact of the proposed development on flood behaviour at the site and adjacent areas.

It is understood that the development would be relying on shelter in place as the flood emergency strategy.<sup>16</sup> While in flash flood environments the risk of remaining in a building above the PMF level may be safer than evacuating, due to the little to no warning time available for the community to appropriately respond, it should not be used to justify *future development* that would expose more people to the flood risk. We emphasise that the strategy of isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation. The consent authority should request the proponent to demonstrate consistency with the [Shelter in Place Guideline](#) prior to granting consent, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing (not limited to) the following:

- detailed assessment of evacuation off-site (the primary emergency management strategy) to determine that evacuation off-site is not achievable. (7)
- the flooding occurs within less than 6 hours from the commencement of causative rain and the duration of shelter in place due to isolation by floodwaters is less than 12 hours from the commencement of rainfall (8b)
- development is **not subject to high hazard flooding** (e.g. floodways, high hazard H5 or H6 areas) or surrounding roadways are not subject to high hazard flooding. (8c)
- **how** shelter in place will be used as part of the site's emergency management response and communicated to occupants (9)
- an understanding of the **secondary risks** and how the proponent proposes they will be managed is outlined in the FIRA. Secondary risks include medical emergencies, building fire, health and wellbeing. (10)
- **demonstrate** that any proposed refuge location is above the height of the PMF and aligns with the design criteria in the Guideline<sup>17</sup> and the Red Cross Preferred Sheltering Practices for Emergency Sheltering in Australia,<sup>18</sup> including water supply, waste management, sanitation, food, and shelter and space management.

We note a Flood Emergency Response Plan<sup>19</sup> has been submitted; however, we recommend the flood emergency response strategy suitable for the is developed once flood risks are

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<sup>15</sup> Stantec. 2024. Parramatta River Flood Study, Appendix I, Figure I6.29

<sup>16</sup> GRC Hydro. 2025. Updated Flood Assessment, page 40

<sup>17</sup> NSW Department of Planning, Housing and Infrastructure. 2024. Shelter-in-place guideline for flash flooding, page 5

<sup>18</sup> Smith, C., and Parsons, C. 2015. Preferred Sheltering Practices for Emergency Sheltering in Australia. Retrieved from <https://www.redcross.org.au/globalassets/cms-assets/documents/emergency-services/2015-preferred-sheltering-practices-for-emergency-sheltering-in-australia.pdf>

<sup>19</sup> GRC Hyrdro. 2024. Flood Emergency Response Plan – 2A Gregory Place, Harris Park, Revision A Report

clearly understood based on a robust Flood Impact and Risk Assessment (FIRA), and therefore it should be reviewed and updated once the FIRA is resubmitted. We **emphasise** that private flood emergency management plans alone are insufficient to address flood at the site and that **the NSW SES does not have statutory authority to endorse or approve flood emergency response plans.**

Should the development be progressed, we recommend building design that considers the potential flood and debris loadings of the PMF, that **can be significant up to H6** at this site, so that structural failure is avoided during a flood.

We understand that *the basement will be flood protected passively to above the 1% AEP level with additional flood protection to the PMF level via active flood gates (specific details to be confirmed during detailed design).*<sup>20</sup> We **recommend** that the basement is passively protected from events up to and including the PMF, ensuring that all openings to the basement (ramp, vents, etc.) are situated above the PMF as a condition of consent. If this is not feasible reconsider basement carparking as any openings to the basement are below the PMF will pose risk to life and property. The installation of retractable flood gates is not an appropriate measure to manage risk to life in the event of a flood as it is reliant on external factors such as human intervention, electricity source, etc., we therefore recommend requesting the proponent to investigate alternative mitigation measures.

**Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.**

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

**Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.**

Managing flood risks requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

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<sup>20</sup> GRC Hydro. 2025. Updated Flood Assessment, page 34

- **Isolation** – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- **Secondary risks** – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- **Consideration of human behaviour** – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

**Principle 5 Risks faced by the itinerant population need to be managed.**

Any Emergency Management strategy needs to consider people visiting the area or using a development.

**Principle 6 Recognise the need for effective flood warning and associated limitations.**

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner.

**Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.**

Development within a floodplain will necessitate ongoing involvement from the NSW State Emergency Service (SES) in community awareness, preparedness, and response activities.