



Your ref: SSD-80432461
Our ref: DOC25/1083704

Edwina Ross
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4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

16 January 2026

Subject: Response to Submissions - Mixed-use development with in-fill affordable housing located at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield (SSD-80432461)

Dear Edwina,

Thank you for your referral received 17 December 2025 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group on the Response to Submissions (RTS) for this State significant development (SSD-80432461).

CPHR has reviewed the *Submissions Report - Mixed-Use Development with In-Fill Affordable Housing* (Colliers, 13 November 2025) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- Flooding – the assessment does not adequately address climate change impacts, basement carpark safety risks, Powells Creek catchment flood behaviour and emergency-management requirements. Key modelling is missing, or incomplete, inappropriate assumptions are relied upon, and critical safety issues such as PMF-level refuge and safe evacuation, remain unresolved. The FIRA is required to be updated to adequately address the issues outlined in further detail in Attachment A.
- Biodiversity – the development is consistent with the Biodiversity Development Assessment Report (BDAR) waiver granted by CPHR on 7 March 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,

Liza Schaeper
A/Director, Greater Sydney
Conservation Programs, Heritage and Regulation

CPHR advice on EIS - Mixed-use development with in-fill affordable housing located at 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield

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

- *Flooding Response Letter* (Telford Civil, 12 November 2025)
- *Updated Architectural Drawings* (Kennedy Associates Architects, 11 November 2025)
- *Flood Impact Assessment* (Telford Civil, 20 March 2025).

Flooding

Key Assessment Issues

1	<i>Consideration of climate change</i>	The <i>Flooding Response Letter</i> has not adequately address CPHR's previous advice that the FIRA must consider climate change impacts. No modelling, calculations, or references are provided to justify the assertion that climate-change impacts are "minimal" and amount to only a few millimetres. Recommended action: Update the FIRA to assess climate-change impacts in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01 (NSW DPE, 30 June 2023) and the Australian Rainfall and Runoff – A Guide to Flood Estimation Version 4.2 (Commonwealth of Australia, 2019).
	<i>Extent and Timing</i>	Pre-determination

2	<i>Basement carparks</i>	The FIRA has not adequately assessed the risks to people associated with inundation with the multi-level basement carpark becoming inundated. The development includes 4-5 levels of basement carparking, with the driveway crest raised approximately 460mm above the 1% annual exceedance probability (AEP) flood level plus freeboard. In rarer events, the basement carpark will be inundated, with the probable maximum flood (PMF) level approximately 1.6m above the driveway crest level. Additionally, as the ground-floor level is below the PMF level, floodwater could also enter the basement through lifts, stairwells, and other service penetrations, further increasing the speed and depth of inundation. Under these conditions, the basement carpark could fill rapidly, potentially trapping occupants. Observed behaviour shows that some people will attempt to retrieve their vehicles when underground carparks flood. The FIRA asserts that the risk is acceptable as the driveway crest complies with the <i>Strathfield Development Control Plan 2005</i> (DCP) requirements. However, meeting prescriptive DCP controls does not ensure that all life-safety risks are mitigated. Strathfield does not have an adopted Flood Risk Management Study and Plan that has tested the adequacy and effectiveness of the relevant DCP flood-related controls. Recommended action: Nominate appropriate driveway crest levels and demonstrate that the flood hazard in the basement carpark during major flooding events are tolerable and that people can safely evacuate.
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	Extent and Timing	Pre-determination
3	Consideration of Powells Creek catchment's flood risk	The RTS has not adequately addressed CPHR's previous advice that the FIRA should be updated using the Powells and Saleyards Creek Flood Study (Strathfield Municipal Council, November 2019) and assess the full range of relevant flood events. The provided FIRA remains unsuitable for assessing flood behaviour at the site and does not satisfy the requirements of <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i>. Key deficiencies include: • Use of a non-validated local model: The <i>Flooding Response Letter</i> relies on a hydraulic model originally prepared for DA2020/256 and asserts it was "approved" by Strathfield Municipal Council (Council). A model reviewed by Council for the purpose of a development application is not an adopted or approved model. Furthermore, it does not have the weight of a Council-led and endorsed study that has been put on public exhibition and it may also be unsuitable for future applications. The <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i> requires that any non-adopted model be validated against known flood events or the adopted Council model. • Misrepresentation of floor-level protection: The <i>Flooding Response Letter</i> states that floor levels are set 500mm above the 1% AEP flood level, implying a level of protection exceeding the 1% AEP flood. However, freeboard is a safety margin to account for uncertainties in modelling and real-world behaviour and cannot be used to increase the depth above the Defined Flood Event at which a property will flood. • Failure to assess the full range of flood risk: The FIRA has only modelled the current-day 1% AEP event and states that a PMF assessment is unnecessary because, "the first floor is anticipated to be above PMF." This does not satisfy the requirements of the Secretary's environmental assessment requirements (SEARs) or the advice contained in the <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i>. The <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i> advises that multiple design events are assessed, including the 10%, 5%, 1%, 0.5%, 0.2% AEP and PMF, to properly assess hazard, flood behaviour, emergency management feasibility, and compatibility with the site's risk profile. Without PMF modelling, the FIRA cannot determine whether the development is compatible with the site's flood risk. • Identification of key hydraulic features: The FIRA does not identify or discuss the key hydraulic controls or interactions that influence local flood behaviour. • Australia Rainfall and Runoff (ARR) version used: The FIRA should specify which version of ARR was used in the assessment as different editions contain substantially different guidance on how to consider climate change.

		Recommended action: Revise the FIRA to satisfy the requirements of the <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i> and the SEARs.
	<i>Extent and Timing</i>	Pre-determination

4	<i>Emergency management</i>	The RTS has not adequately addressed CPHR’s previous comment that the risk exposure at the site during major flooding events should be reviewed, nor does it demonstrate that the SEARs requirements for emergency management have been met. Several key deficiencies remain unresolved: • Access to PMF level refuge for all occupants: The FIRA does not confirm that ground floor occupants (including commercial tenants, staff, and visitors) will have safe access to refuge above the PMF level. The <i>Updated Architectural Drawings</i> indicate that Level 1 is a secured residential floor, which would prevent non-residential occupants from accessing the proposed refuge area. • Refuge size and suitability: The <i>Flooding Response Letter</i> refers to refuge sizing at 2m² per person, but provides no supporting calculations, occupancy assumptions, or plans showing how this requirement is met. • Isolation duration or external hazard during major events: The FIRA does not evaluate the likely isolation duration during major flood events, or the hydraulic hazard of surrounding floodwaters during a PMF. • Emergency management arrangements: The <i>Flooding Response Letter</i> relies on unidentified future “actors” to undertake critical emergency-response actions and proposes that a Flood Emergency Response Plan will be developed at a later stage. Relying on unspecified personnel does not demonstrate that emergency management will be practical, reliable, or effective over the life of the development. Recommended action: Revise the FIRA to assess the full range of flood events up to and including the PMF. The revised FIRA: • Is prepared in accordance with the <i>Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01</i>, the Shelter in place guideline for flash flooding (NSW DPHI, January 2025) , and the SEARs. • Demonstrates safe, unrestricted access to PMF level refuge for all building occupants. • Confirms the suitability and capacity of flood refuge. • Assesses isolation duration and the external flood hazard during PMF conditions. • Presents credible emergency-management arrangements.
	<i>Extent and Timing</i>	Pre-determination

End of Submission