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

11/02/2026

Subject: CPHR comments – Response to Submissions for the Amended Proposal – WSU Indigenous Centre of Excellence (SSD-64916225)

Dear Ingrid,

Thank you for your correspondence received 24 December 2025 seeking comments from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water on the Response to Submissions for the WSU Indigenous Centre of Excellence (SSD-64916225) at the Western Sydney University Parramatta South Campus, 171 Victoria Road, Parramatta.

CPHR has reviewed the *Response to Submissions for the Amended Proposal Western Sydney University Indigenous Centre of Excellence* (Colliers Urban Planning, 24 December 2025) and relevant technical reports and provides detailed flood comments at **Attachment A**.

In summary, CPHR advises that.

- Considerable residual flood risks remain with this development as proposed.
- The updated modelling shows significantly greater depths and extents of flooding across all modelled events, in Victoria Road and adjacent areas to the site such as Railway Street. This highlights the need for detailed consideration of site access and egress during flood events, and for flood models to be adequately reviewed.
- The updated Flood Impact and Risk Assessment (FIRA) has not provided further information to enable due consideration of long duration extreme event flooding from the Parramatta River. The [Shelter-in-Place Guideline for flash flooding](#) does not recommend sheltering on site with long durations of isolation. Further consideration of the risk associated with high hazard flooding and the potential for long duration flooding is recommended.
- An adequate assessment of structural integrity to address CPHR's previous comments has not been provided. The [Shelter-in-Place Guideline for flash flooding](#) requires "structural soundness for conditions in a PMF event, considering flood and debris forces, be verified by a suitably qualified structural engineer". Without an adequate assessment this remains unaddressed and raises unresolved safety risks.

CPHR has reviewed the updated *Biodiversity Development Assessment Report* (Eco Consulting, 10 December 2025) and it is considered adequate.

Should you have any queries regarding this matter, please contact the Greater Sydney Planning Team via rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Kerry Richardson', with a stylized, flowing script.

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

CPHR flooding advice – Response to Submissions for the Amended Proposal – WSU Indigenous Centre of Excellence (SSD-64916225)

In providing the advice below, CPHR has reviewed the following documents:

- *Appendix K - Flood Impact Risk Assessment - Western Sydney University Rev M* (GRC Hydro, December 2025) (FIRA)
- *Appendix L - WSU Indigenous Centre of Excellence SSDA – Structural Integrity During a PMF Event* (TTW, 7 April 2025).

Key Assessment Issues

1.	Flood model and flood behaviour	The FIRA has been updated to refine the hydrological and hydraulic models to accurately represent local overland flooding on Victoria Road. The results now show significantly greater depths and extents of flooding across all modelled events, in Victoria Road and adjacent areas to the site such as Railway Street. This impacts consideration of access and egress during flood events, as discussed below. This also highlights the need for flood models to be adequately reviewed. Thoroughly reviewed Council flood study models are typically the best starting point for use in FIRAs. CPHR confirms agreement with Council's comment that scaling to present day (which is mentioned as 11%) is in addition to the rainfall intensity increase of 19% and adoption of highest temporal pattern. These factors need to be modelled together to properly represent the present day 1% AEP flood. Recommended action Continue engagement with CPHR until issues with the modelling raised by Council are resolved.
	<i>Extent and Timing</i>	Pre-determination
2.	Flood impacts	Figure 41 of the FIRA shows the proposed development appears to worsen flooding conditions on the sole access road for the entire campus, Railway Street, in the event referred to as the "1% AEP" flood. Recommendation action: Detailed consideration of the impacts to Railway Street.
	<i>Extent and Timing</i>	Pre-determination
3.	Access	The updated modelling shows greater local overland flooding on surrounding roads. A higher frequency of inundation and isolation increases the risk of several adverse outcomes as stated previously. This does not appear to have been updated in the latest report. CPHR recommendation Update the FIRA to discuss flood impacts on access and egress, including the frequency of activation of flood emergency management procedures.
	<i>Extent and Timing</i>	Pre-determination

4.	Residual Risk and Emergency Management	The FIRA has not provided further information to enable due consideration of long duration extreme event flooding from the Parramatta River. CPHR anticipates that the duration of isolation could be over 12 hours, and this has been confirmed in another study. The Shelter-in-Place Guideline for flash flooding does not recommend sheltering on site with long durations of isolation. Although Indigenous Centre of Excellence occupants would relocate to another area of the campus, they would still be sheltering on site and not evacuating to another location. Recommended action The consent authority considers the risk associated with high hazard flooding and the potential for long duration flooding and if necessary, request the applicant to provide further detailed assessment of durations of isolation.
	<i>Extent and Timing</i>	Pre-determination
5.	Shelter in place strategy	The latest FIRA has adopted a strategy of evacuating occupants to another area of the campus. This strategy avoids sheltering in place with high hazard flooding affecting the building, but high hazard flooding continues to affect access and egress to the site, except for a one-way road, Bridge Street, which directs traffic towards the site. As explained previously, CPHR does not recommend the FIRA or Flood Emergency Response Plan (FERP) state that emergency services can assist occupants via Bridge Street. As stated above, the duration of isolation remains to be addressed. Recommended action The consent authority considers the risks associated with sheltering in place with high hazard flooding on the access road to the site.
	<i>Extent and Timing</i>	Pre-determination
6.	Flood Emergency Response Plan	CPHR has previously provided comments on the FERP section of the FIRA. In accordance with Principle 9 of the Flood Risk Management Manual, effective flood risk management leads to informed decisions about limiting increases in flood risk related to new and modified development. Decisions to place new development in the floodplain generally increase flood risk. FERPs should not be used to justify development. Sound, constraints-based land use planning can be significantly more effective in managing flood risk than FERPs. FERPs may be valuable once a decision is made to proceed with a development. The FERP now includes using a daily forecast rainfall of 100mm as a trigger without further explanation. The FIRA should explain the basis for using this rainfall amount. Given the uncertainty of rainfall forecasts, further consideration is needed to understand the frequency with which such a forecast would occur and the frequency with which site isolation may occur in the absence of any warning. This enables consideration of the likelihood of future warning fatigue.

		Recommended action Continue to consult the SES on any FERP for the proposed development and consider the points raised in earlier advice. Review the appropriateness of the 100mm trigger.
	<i>Extent and Timing</i>	Pre-determination
7.	Structural integrity	No adequate response has been received on this item. The previous recommendation remains unchanged. The FIRA discussion in response to Item 10 ii of the Shelter-in-Place Guideline for flash flooding regarding structural integrity appears to argue against the guideline itself. The guideline requires “structural soundness for conditions in a PMF event, considering flood and debris forces, be verified by a suitably qualified structural engineer”. An area immediately adjacent to the building appears to be subject to H4 hazard from the 1% AEP present day flood. Therefore, high hazard flooding is expected to begin from a much smaller event than the PMF. Consideration of the risk profile between the 1% AEP event and the PMF has not been enabled by the provision of details on intermediate flood events. The 0.2% flood event has not been scaled to present day or future climate. This highlights the importance of using the PMF modelling results to understand the impact of rare to extreme flood events on flood risk. CPHR expects that large debris from the local environment including Victoria Road would be mobilised in the event of a PMF. The suggestion that roads would be blocked and therefore not be a source of debris is inconsistent with real world observations. During floods, water levels rise and drivers may be unable to turn around and escape floodwater, particularly in high traffic conditions. SES has records of vehicle rescues in the vicinity of the site in recent years even without major flood events. Vehicles can become stranded well in advance of the peak of the flood event. If water levels rise high enough, these vehicles then begin to float and become large debris. A further source of debris is the Vineyard Creek corridor, which is heavily vegetated for approximately 2km upstream of the site. It is strongly recommended that the structural engineer be consulted to determine an appropriate approach to manage debris impacts during a PMF. This would require the upper levels where occupants may be sheltering to remain intact. The ground floor would be inundated in the order of 1.5m depth in a PMF and may not be able to remain intact during extreme flood events. The ground floor may be damaged, with only piers/supports remaining to support the upper levels. The structural design must enable upper floors to remain habitable for the duration of the PMF. Recommended action The structural design considers debris loads on the ground floor and provides a strategy to enable occupants to shelter on upper levels. The consent authority may consider a peer review of the structural integrity assessment and whether an assessment of buoyancy forces is required.
	<i>Extent and Timing</i>	Pre-determination

End of Submission