



Your ref: SSD-90243456
Our ref: DOC26/161577

Annabel Turner
Planning Officer Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

22 April 2026

Subject: Environmental Impact Statement – 10 Valentine Avenue, Parramatta (SSD- 90243456) and Concurrent Rezoning

Dear Annabel,

Thank you for your referral received 13 March 2026, requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy the Environment and Water on the above project.

CPHR has reviewed the Environmental Impact and Rezoning Statement (Urbis, 24 February 2026) and relevant supporting technical reports and provides detailed flooding and biodiversity comments at **Attachment A**.

The development appears to be inconsistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 4 December 2025. Please note, if the proposed development is changed so that it is no longer as described in Schedule 1 of the 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 the Greater Sydney Planning team at rog.qsrplanning@dcceew.nsw.gov.au.

Yours sincerely,

S. Harrison

Susan Harrison
**Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR comments on the Environmental Impact Statement – 10 Valentine Avenue, Parramatta (SSD-90243456) and Concurrent Rezoning

Documents Reviewed

CPHR has reviewed the following documents and provides comments below:

- *Environmental Impact and Rezoning Statement – 10 Valentine Avenue, Parramatta* (Urbis, 24 February 2026)
- Appendix D1 – Architectural Plans (Buchan Furtado Sullivan, 20 February 2026)
- Appendix Y – Civil Plans (Arup, 19 December 2025)
- Appendix V – Flood Impact Risk Assessment (Arup, 18 December 2025).

Key Assessment Issues

Flooding

1.	Model Inputs	Building Representative Section 4.3.1 of the Flood Impact and Risk Assessment (FIRA) states, <i>The Council modelling approach treated all buildings as fully blocked, which is a conservative way to assess flood behaviour and peak flood levels. This approach has been maintained and the existing building extents on the site have been revised to reflect the ground floor extent based on the survey data provided (dated 28/02/2019).</i> In reference to the above, CPHR notes that this approach has been adopted by Council across the entire catchment. For this SSD, a site-specific FIRA is required, in which the flood modelling should represent actual onsite conditions by allowing the flow to enter the building through applying full blockage to the kerb and the slab, that is up to 0.3m then a high roughness manning 'n' at a depth higher than 0.3m. It is not recommended for a site-specific FIRA to demonstrate a wall of flow up to 3m and where the natural flow of water is not dispersed to surrounding areas. By allowing the flow to enter naturally in the building, the current flood levels will be reduced in all flood events as it will be distributed across the streets and the site. Recommendation The FIRA is to utilise a truncated model for this site-specific SSD to appropriately represent the building in both existing and post developed condition.
	Extent and Timing	Prior to determination
2.	Adjusting the Base Case	Consideration of Australian Rainfall and Runoff 2019 (ARR) Version 4.2 Section 4.4.2 of the FIRA states: <i>Given the complexity and challenges associated with making modifications to the Council supplied hydrology models, the rainfall uplifts have been applied as multipliers to the hydrology inflows to the TUFLOW model.</i> In reference to the above, CPHR notes that the validity of this approach is uncertain. No information has been provided on the applied multipliers and how it was estimated. Section 6.4.1 of the FIRA indicates that increases in peak flood levels of approximately

		300mm for the 1% Annual Exceedance Probability (AEP) event and up to 800mm for the Probable Maximum Flood (PMF) may occur from the year 2030 and 2100. Recommendation As the scaled Intensity Frequency Duration (IFD) has not been applied to the model in accordance with the ARR 2019 Version 4.2, clarification be provided on the adopted multipliers to the hydrology inflows approach.
	Extent and timing	Prior to determination
3.	Model Inputs	Section 6 Post-Developed Scenario Table 6-1 As the FIRA adopted a completely blocked building in both the existing and post-development scenarios, the post-development results are almost identical to the existing conditions. This is due to the development footprint, where the bulk of changes would occur, is completely blocked. Recommendation As provided in Recommendation 1.
	Extent and timing	Prior to determination
4.	Flood Impact due to Development	Section 6.3 Flood Impact Assessment As outlined above, the impacts provided in the FIRA do not reflect the actual flood impact because the modelling assumes a fully blocked building in both the existing and post-development scenarios. Recommendation As provided in Recommendation 1.
	Extent and timing	Prior to determination
5.	Climate Change	Climate Change Long Term 2100 Section 6.4.1 states: <i>Under these extreme future conditions, pedestrian evacuation directly from the basement and ground-floor retail areas to Valentine Avenue via the northern retail frontage would no longer be feasible. In such circumstances, an alternative vertical evacuation pathway to Level 1 would be required. This could be achieved in the future through retrofitting of back-of-house areas or the provision of additional stairwells, if required.</i> The FIRA proposes to defer the consideration of climate change to an unspecified future date. The NSW Department of Planning, Housing and Infrastructure (DPHI) released the Draft Climate Change Scenario Guidelines for consultation in February 2026 and are anticipated to be finalised in June 2026, The Draft Guidelines outlines the minimum requirements for climate change scenarios in planning decisions for major projects/development. It is recommended that the FIRA consider the Guideline in its assessment. Recommendation The design to consider SSP3-7.0 emission scenarios for the modelling timeframe of 50 years and 100 years.

	Extent and timing	Prior to determination
6.	Risk to Life	Section 8.2 PMF Basement Protection Passive basement protection has not been incorporated into the basement design. Instead, protection is proposed through automated flood gates. Reliance on automated flood gates can pose additional risk, should the gates fail to operate. Furthermore, the proposed basement protection only applies to the base case scenario and does not account for medium or long-term climate change conditions. It is the responsibility of DPHI or Council to determine whether the use of flood gates is an acceptable form of active basement protection. Recommendation • The protection be consistent with DPHI's Draft Climate Change Scenario Guidelines. • Protection is required for all openings and vents that allow water to enter the basement.
	Extent and timing	Prior to determination

Biodiversity

7.	Consistency with BDAR waiver determination	CPHR has reviewed the EIS in relation to the development description outlined in Schedule 1 of the BDAR waiver determination issued on 4 December 2025. It is difficult to determine whether the development footprint presented in the EIS architectural plans aligns with that described in the BDAR waiver. Notable discrepancies include changes to building shapes, the addition of hardstand surfaces, and variations in the description of the proposed development and site description. As per CPHR's BDAR waiver advice (our reference DOC25/984634), if the proposed development is changed so that it is no longer as described in Schedule 1 of the determination, the applicant will need to lodge a new waiver request or prepare a BDAR. Recommendation Clarify if there are any inconsistencies between the development in the approved BDAR Waiver and the development the subject of the EIS.
	Extent and timing	Prior to determination

End of Submission