



Your ref: SSD-45576956
Our ref: DOC25/364522

Mr Patrick Nash
Senior Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2124

17 June 2025

**Subject: Environmental Impact Statement – Children’s Medical Research Institute (CMRI)
Gene Technologies Building (SSD-45576956)**

Dear Mr Nash

Thank you for your referral received 6 May 2025 seeking comments from the Conservation Programs, Heritage and Regulation (CPHR) Group in the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the Environmental Impact Statement (EIS) for the above State Significant Development (SSD).

CPHR has reviewed the EIS and relevant supporting technical reports and provides its comments and recommendations at Attachment A. In summary:

- the flood information provided is superseded by the Parramatta River Flood Study (PRFS) (Stantec, 2024)
- the PRFS and flood modelling from this study must be included in a revised Flood Report
- the proponent must confirm whether the proposed development would be categorised as a sensitive land use and require additional flood mitigation
- if a sensitive land use is confirmed, consultation with the NSW State Emergency Service is required
- the project description provided in the EIS is consistent with the Biodiversity Development Assessment Report waiver for this SSD that was granted on 23 September 2024.

Please note that CPHR should not be given a role in any conditions of consent without prior agreement. Should you have any queries regarding this matter, please contact Angela Stewart, Senior Conservation Planning Officer, at angela.stewart@environment.nsw.gov.au.

Yours sincerely

Louisa Clark
Director
Regional Delivery - Greater Sydney Branch
Conservation Programs, Heritage and Regulation Group

CPHR advice on EIS – CMRI Gene Technologies Building (SSD-45576956)

Documents Reviewed

CPHR has reviewed the following reports:

- *EIS* (Architectus Australia, 28 March 2025)
- *Appendix F – Architectural Design Report* (Hassell, 7 June 2024)
- *Appendix G – Architectural Plans* (Hassell, 29 February 2024)
- *Appendix H – Landscape Report* (Hassell, 10 February 2025)
- *Appendix I – Landscape Plans* (Hassell, 10 February 2025)
- *Appendix J – Arboricultural Impact Assessment* (Truth about Trees, 11 June 2024)
- *Appendix Z – Flood Report* (Taylor Thomson Whitting, 14 January 2025).

Key Assessment Issues**Flooding**

The Parramatta River Flood Study (PRFS) (Stantec, 2024) prepared on behalf of City of Parramatta Council (Council) was used to inform CPHR's below advice.

1.	<i>Flood modelling must align with the current Council flood study</i>	The Flood Report (page 7) states, 'A Flood Enquiry application was submitted in April 2022' and includes information from the now superseded Upper Parramatta River Flood Study. This information is outdated as Council adopted the PRFS in June 2024. The Flood Report does not include the PRFS in the list of guidance documents under Section 1.4. The flood mapping in the PRFS shows substantially more inundation on the subject site from what is shown in the Flood Report. The PRFS also shows no flooding on Hawkesbury Road at the subject site because an appropriate depth filter has been applied to the flood model results before mapping. CPHR recommends that the proponent contacts Council to access flood model data from the PRFS. The proponent must verify their models against the PRFS for the full range of flooding events, and include the following: 1. The PRFS was calibrated following a flood frequency analysis for the Marsden Street Weir. The initial flow estimates based on Australian Rainfall and Runoff (2019) methodology and were factored up by around 30%. Council can provide guidance on the relevant approach to calibrate flows for this SSD. The factoring methods are varied by watercourse and/or overland flow. The proponent must calibrate their flood model so that the flows match Council's model. 2. Following calibration, the Flood Report must present relevant hydrographs for at least the 1% Annual Exceedance Probability (AEP) and Probable Maximum Flood (PMF) events. These modelled hydrographs must demonstrate similarity in shape and peak flow, and a similar water volume to Council's model. 3. All relevant structures such as drainage infrastructure must be compared between the two models. The proponent may require clarification from Council to resolve any discrepancies or adopt the data directly from Council's model.
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		4. Compare the terrain in both models and account for any differences. 5. Compare the model grid size and ensure the proponent's model uses the same size as Council's model. 6. Apply an appropriate depth filter to the results, the same approach undertaken for the PRFS, for example 100 or 150 mm. An alternative to calibrating the proponent's flood model would be to undertake the assessment using Council's model, with any required amendments to reflect the latest topographic and drainage conditions. Flood impacts must be recalculated following the above amendments. The reasons for any predicted impacts must be fully explained in the revised Flood Report, for example demonstrating whether this may be due to narrowing of the overland flow path or raising of the terrain. CPHR requests a figure of the proposed and existing building footprints be provided. If terrain raising is perceived to be the cause of impacts, a comparison of depths may result in no change to flood depths would be caused by the proposed development. Blocking overland flow through buildings in the flood model should not be used to provide a conclusion that the subject site is "generally flood free". An investigation must be undertaken of the existing buildings adjacent to the overland flow path to determine whether they are currently subject to inundation during the 1% AEP and PMF events. The investigation must also consider the locations of entry points such as doors and the ground floor level. Following this investigation, the flood model may need to be amended to include the available floodplain storage under existing conditions. CPHR advises this would enable a more accurate flood impact assessment. Recommended actions: 1. The proponent contacts Council to access flood model data from the PRFS or undertakes the assessment using Council's model, with any required amendments to reflect the latest topographic and drainage conditions. 2. A figure of the proposed and existing building footprints is to be provided. 3. The flood investigation should include existing buildings adjacent to the overland flow path and consider flooding through the existing buildings.
	<i>Extent and Timing</i>	Response to Submissions.

2.	<i>Proposed land use</i>	Section 4.2 Land Use Permissibility of the EIS (page 50) states: <i>"The site is zoned SP2 Infrastructure for the purpose of 'Health Services Facilities' under the Parramatta Local Environmental Plan 2023 (PLEP 2023) Health services facilities are permitted with consent in this zone under the PLEP 2023. The definition of 'Health services facility' includes 'hospital'. The definition of 'hospital' includes 'research purposes (whether or not carried out by hospital staff or health care workers or for commercial purposes)."</i>
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		A reception area is proposed on the ground floor, which appears to be intended for receiving patients for treatment. If treatments are undertaken in conjunction with the hospital, the proposed development may be considered a hospital for the purposes of flood risk management. If this is not the case, the Response to Submissions (RtS) and revised Flood Report needs to clarify that the proposed development would not receive patients. CPHR considers a research-only facility that does not receive patients may be considered either an educational establishment or a commercial use, subject to further information. If the proposed development is categorised as a 'hospital', protection of the ground floor level to the PMF as well as the 1% AEP flood level plus 0.5 m freeboard must be provided. Recommended action: 1. The RtS and revised Flood Report clarify whether the proposed development would or would not receive patients.
	<i>Extent and Timing</i>	Response to Submissions.

3.	<i>Emergency management</i>	Only part of the subject site is flood affected, with the PRFS identifying Hawkesbury Road being flood-free. This must be addressed in the emergency management strategy for the revised Flood Report. A shelter in place strategy may not be required for the subject site if access remains available for the full range of flood events. However, the risks due to flooding along the other side of the subject site are required to be addressed in the emergency management strategy. The following issues with the Flood Report have been identified: • The Bureau of Meteorology does not provide flood warnings for this area. • Section 6 (page 46), is contradictory as it initially acknowledges flash flooding and states that shelter in place is required and that "users of the site will remain onsite, moving to higher floors". But then it states that, "All users of the site and known visitors to the site will be given advance warning of closure of the site". Recommended actions: 1. If a sensitive land use is confirmed, this SSD must be referred to the NSW State Emergency Service (SES) for detailed advice on emergency management. 2. The revised Flood Report must include discussion on emergency management and include the full range of flooding up to the PMF. 3. The Shelter-in-Place guideline for flash flooding may be considered to inform the emergency management strategy even where occupants are not required to shelter in place. 4. The revised Flood Report update Section 6 to incorporate the abovementioned comments and if relevant SES advice.
	<i>Extent and Timing</i>	Prior to determination at Response to Submissions.

Biodiversity

The project description provided in the EIS is consistent with the Biodiversity Development Assessment Report (BDAR) waiver for this SSD that was granted on 23 September 2024. If the proposed development is changed so that it is no longer as described in Schedule 1 of the determination, the proponent will need to lodge a new BDAR waiver request or prepare a BDAR.

End of Submission