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

14 October 2025

Subject: CPHR comments on Submissions and Amendment Report – WSU Indigenous Centre of Excellence (SSD-64916225)

Dear Ingrid,

Thank you for your correspondence received 16 September 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 Submissions and Amendment Report 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 *Submissions and Amendment Report Western Sydney University Indigenous Centre of Excellence* (Ethos Urban, 26 August 2025) and relevant technical reports and provides comments at Attachment A. In summary CPHR recommends further work on flood modelling and flood impacts be undertaken, noting that even with the completion of this additional work, considerable residual risks may remain associated with this development as proposed.

CPHR has reviewed the updated *Biodiversity Development Assessment Report* (Eco Consulting, 18 August 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

Louisa Clark

**Director Greater Sydney
Regional Delivery
Conservation Programs, Heritage and Regulation**

CPHR flooding advice – Submissions and Amendment Report WSU Indigenous Centre of Excellence (SSD-64916225)

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

- *Submissions and Amendment Report Western Sydney University Indigenous Centre of Excellence* (Ethos Urban, 26 August 2025)
- *Western Sydney University Indigenous Centre of Excellence Flood Impact Risk Assessment* Version I (GRC Hydro, 24 July 2025) (FIRA)

Key Assessment Issues

1.	Flood model and flood behaviour	CPHR understands that City of Parramatta Council accepts the GRC Hydro model for the purposes of assessing this development due to errors in the model used for the Parramatta River Flood Study model. Nevertheless, CPHR is not satisfied that the model accurately represents local overland flooding. The model does not provide sufficient detail to make assertions regarding local overland flooding of Victoria Road, because runoff from Victoria Road has been applied in the model either upstream or downstream of the road itself. Sub-catchments should be discretised for the road surface and relevant pits and pipes should be included in the model. This is particularly important given that the road is 6 lanes wide and rises to a bridge for a significant distance in the order of 500m. This road catchment could create local overland flooding when pit capacities are significantly exceeded. Shorter storm durations would be critical compared to those for Vineyard Creek. Only with the above additional detail in the model would it be possible to make conclusions about the frequency of local overland flooding in Victoria Road and therefore the frequency with which access and egress is lost. CPHR recommendation The FIRA is updated to refine the hydrological and hydraulic models to accurately represent local overland flooding on Victoria Road.
	<i>Extent and Timing</i>	Pre-determination
2.	Flood impacts	CPHR previously requested consideration of flood impacts for the full range of flood events. Only the 1% Annual Exceedance Probability (AEP) flood event has been considered. Impacts for the 5% AEP flood event and the Probable Maximum Flood (PMF) should also be modelled to understand the impact of the development on flood behaviour for a range of flood events. Hazard mapping in the FIRA indicates that the development would increase hazard in the PMF. CPHR recommendation The FIRA is updated to consider flood impacts for the full range of flooding.
	<i>Extent and Timing</i>	Pre-determination
3.	Access	As stated in the above recommendation, further modelling is needed to address local overland flooding on Victoria Road. This revised modelling may lead to a higher frequency of inundation and isolation,

		which would increase the risk of several adverse outcomes, as previously advised by CPHR. CPHR recommendation Following the completion of updated modelling, which is to include local overland flooding on Victoria Road, the discussion in the FIRA on access and egress should be updated.
	<i>Extent and Timing</i>	Pre-determination
4.	Residual Risk and Emergency Management	In the PMF, floodwater from Vineyard Creek would inundate the ground floor to a depth in the order of 1.3m. The FIRA maps high hazard floodwater around the proposed building and on surrounding roads. The Parramatta River PMF would also isolate the site. CPHR previously recommended consideration of the time duration of isolation from a range of storm durations. CPHR anticipates that the duration of isolation could be over 12 hours, and this has been confirmed in another study. CPHR recommendation The consent authority considers the risk associated with high hazard flooding and the potential for long duration flooding.
	<i>Extent and Timing</i>	Pre-determination
5.	Shelter in place strategy	CPHR previously advised that shelter in place is not considered suitable in areas of high hazard flooding or when the duration of isolation is not short. While the FIRA has assessed the development against the Shelter-in-Place guideline for flash flooding, the commentary on page 107 has omitted that the PMF would cause high hazard flooding around the proposed building and on surrounding roads. Therefore, the requirement under item 8c of the guideline has not been met. CPHR recommendation The consent authority considers the risks associated with sheltering in place with high hazard flooding.
	<i>Extent and Timing</i>	Pre-determination
6.	Flood Emergency Response Plan	CPHR previously raised several issues with the Flood Emergency Response Plan (FERP) that have not been adequately addressed: • Details of “back up power and water provision” should be provided given the sensitive nature of this development. • Details should be provided on the number of occupants on the ground floor and how much space per person would be available in the shelter locations. • The nominated emergency access point immediately south of the proposed building’s southern entrance would not provide emergency access as the area is subject to H4 hazard in the PMF. • The FERP suggests that “staff should specifically look for warnings related to Parramatta River”. The FIRA should clearly state that:

		- BOM issues severe weather warnings and flood watches, but does not issue flood warnings for the Parramatta River - Flood Watches may provide advanced notice of flooding, but these would not provide advanced notice for all flood-producing rain events affecting the development site. - Severe weather warnings would not be issued for all flood-producing rain events affecting the development site. • CPHR is concerned that there is insufficient time to relocate the number of people on the ground floor to the first floor with a warning time of less than 20 minutes. The FIRA has not demonstrated that the time available would be sufficient for flood wardens to initiate relocation of occupants and complete this process. In addition to the above, CPHR has identified further issues in the latest FIRA: • While Bridge Street may remain low hazard in a PMF event, the building itself is surrounded by high hazard floodwater, which is unsafe for people and vehicles. Bridge Street is also one-way in the direction towards the university. While it may be acceptable for emergency vehicles to travel in the opposite direction of traffic, this may not be feasible for an evacuation. Further, on arrival in James Ruse Drive, vehicles would need to turn left and from there either return to Victoria Road, which would be flooded or continue south along James Ruse Drive to Camellia, which would also be flooded. CPHR therefore does not recommend the FIRA or FERP state that emergency services can assist occupants via Bridge Street. Further, it should not be suggested that the site can be evacuated via Bridge Street. • Section 7.4 and subsection 7.4.2.2 suggest evacuation notices be issued, which contradicts the recommended shelter in place strategy. Similarly, Section 7.4.2.1 refers to the shelter in place strategy as a contingency. Early closure may instead be considered in response to flood watches or FloodSmart warnings. The FIRA must be clear and consistent on the proposed emergency management strategy. • Figure 52 should be deleted as the location is subject to H4 flooding in a PMF. Figure 53 should also be deleted as access to the building during a flood event should not be promoted. • The FloodSmart system should not be relied upon to inform development assessment. Warnings provided by the system cannot be expected to provide sufficient warning for this development. This is in part due to the very short time to onset of site flooding, which is established as 20 minutes in the FIRA. CPHR recommendation The FERP section of the FIRA should be updated in accordance with the above comments and document the risks associated with the very short warning time.
	<i>Extent and Timing</i>	Pre-determination

7.	Structural integrity	The letter from TTW appended to the FIRA titled “SSDA – Structural Integrity During a PMF Event” states that “Minimal debris is expected to impact the structure”. CPHR does not agree with this statement as the local environment includes Victoria Road, and it should be expected that cars and other large debris such as trees would be mobilised in the event of a PMF. CPHR recommendation The FIRA should consider debris loads. 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