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10 December 2025

Lucinda Craig
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Locked Bag 5022
Parramatta NSW 2124

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CC: claire.flashman@ses.nsw.gov.au

Dear Lucinda,

State Significant Development Application for 1 Barrack Lane, Parramatta Build-to-Rent Development

Thank you for the opportunity to provide advice on the State Significant Development Application for Build-to-Rent (BTR) Development 1 Barrack Lane and 81-83 George Street, Parramatta. It is understood that the proposed development seeks development consent for the demolition of existing structures and the construction of a 40-storey mixed use development with ground floor retail and a **BTR** tower. Specifically, the proposal comprises:

- The demolition of existing site structures and the removal of two trees;
- The construction of a forty-storey mixed-use development comprising:
 - Site preparation works including preparatory earthworks.
 - A three-storey podium including:
 - Ground floor: a flexible retail area and a retail tenancy, a BTR lobby and management area, services and waste rooms, separate vehicle entries for residential use and service use, 4 parking spaces for service vehicles, bike repair facilities and 40 bicycle parking spaces,
 - First level: 32 car parking spaces, inclusive of 2 accessible spaces, 214 bicycle parking spaces, 7 motorcycle parking space, a residential storage area and services,
 - Second level: 39 car parking spaces, inclusive of 2 accessible spaces, 170 bicycle parking spaces, 7 motorcycle parking spaces, a residential storage area and services, and
 - Upper podium level: providing communal open space and amenities.
 - A thirty-seven (37) storey residential tower incorporating **383 BTR apartments** (including 235 dual key apartments).

It is understood that the site is subject to an existing concept approval for a 40-storey commercial office premises, granted by the Sydney Central City Planning Panel under DA-

937/2022 on 19 December 2023. Industry Specific SEARs were issued on 29 January 2025 for the redevelopment of the site for the subject mixed-use BTR development.¹

We have reviewed the following documents provided as part of the preparation of our advice.

- Environmental Impact Statement (Mecone, October, 2025)
- Appendix AY - Detailed maps and plans (Mecone)
- Flood Impact and Risk Assessment (SMEC, 29 October, 2025)
- Appendix E - Flood Emergency Response Plan (SMEC, 29 October, 2025)
- Parramatta River Flood Study (Stantec, 2024)

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami in NSW. This role includes planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

We note the proposal has considered flooding issues in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines, including the Support for Emergency Management Planning and relevant planning circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including 4.1 Flooding and PS24-001.

The site is affected by flash flooding, "impacted by backwater effects from the Parramatta River during the Probable Maximum Flood (PMF) event. For all other design flood events, the site is influenced solely by local overland flow."² The modelling suggests that the site itself would be largely flood free up to the 0.2% AEP event,³ with the area along George Street (the northern boundary of the site), affected by shallow overland flow occurs in all rainfall events, ranging between 0.1 to 0.5 metres in most flood events up to, and including, the 0.2% AEP.⁴ However, in a PMF event the site becomes impacted by mainstream flooding from the Parramatta River, with the entire site and surrounding roads inundated and buildings surrounded by floodwater with depths of up to 4 metres⁵ and H5 – H6 hazard level⁶ categorised as floodway.⁷ While the building would be providing floor levels above the PMF, the site would be a **High Flood Island**, completely isolated and expected to be isolated by floodwaters for up to six hours.⁸

It is understood that the proposal relies on a shelter in place strategy to manage flood emergencies at the site. Noting that all residential dwellings will be above PMF event (on

¹ Mecone. 2025. Environmental Impact Statement, page 5

² SMEC. 2025. Flood Impact and Risk Assessment, page 13 & 29

³ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B05

⁴ SMEC. 2025. Flood Impact and Risk Assessment, page 6 & Drawing B01 – B04

⁵ SMEC. 2025. Flood Impact and Risk Assessment, page 6 & 21

⁶ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B24 & C24

⁷ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B18

⁸ SMEC. 2025. Flood Impact and Risk Assessment, page 34

Levels 4 and above), residents will be advised to shelter at home, while occupants of the significantly flood affected Ground Floor tenancies (with over flood flooding potentially to exceed 2.7 metres in a PMF event⁹ will be advised to use the communal refuge area on Level 3 for shelter.¹⁰

In summary, we:

- **Emphasise** that the strategy of isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation and it should not be used to justify *future development*. As the land around the building, including the surrounding roads, is impacted by high hazard **H5 – H6 flooding in a PMF event, categorised as floodway**, the proposal is not compliant with the Shelter in Place Guideline for flash flooding. We **recommend** the consent authority is satisfied that the proponent can demonstrate consistency with the [Shelter in Place Guideline](#) prior to consent being granted, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing (but not limited to):
 - flooding occurs within less than 6 hours from the commencement of causative rain and the duration of shelter in place due to isolation by floodwater is less than 12 hours from the commencement of rainfall (8b)
 - the development is not subject to high hazard flooding (e.g. floodways, high hazard H5 or H6 areas) or surrounding roadways are not subject to high hazard flooding (8c)
 - an understanding of the secondary risks and how the proponent proposes they will be managed is outlined in the FIRA. Secondary risks include medical emergencies, building fire, health and wellbeing. (10)
- **Noting** the H5 – H6 flooding impacts against the proposed building in a PMF event, we **recommend** building design that considers the potential flood and debris loadings of the PMF so that structural failure is avoided during a flood. We **highlight** that under a H5 flood hazard level, all buildings are vulnerable to structural damage and at H6 all building types are considered vulnerable to failure.¹¹
- Considering the significant inundation of the Ground Floors, including lifts openings, that can occur in a PMF event, we **advise careful consideration** of safety features for proposed lifts (both for people and vehicle) at the design stage, to mitigate floodwater impacts and ensure people do not exit into flooded areas. All site users must be made aware of the flood risks and dangers of using the lifts during flood events, as this will pose a direct risk to life for any persons who may attempt to do so.
- **Highlight** that the 132 500 phone number in the Emergency Contact List (Table E1)¹² is the NSW SES State Operations Centre contact and not the Fire/Ambulance/Police as noted in the FERP. The 000 emergency service number is to be used to contact

⁹ SMEC. 2025. Flood Impact and Risk Assessment, page 25 – 26 & 34

¹⁰ SMEC. 2025. Flood Impact and Risk Assessment, page 34 - 35

¹¹ Department of Planning and Environment. 2023. Flood risk management guideline FB03, Flood Hazard - Figure 1 General flood hazard vulnerability curve, page 3

¹² SMEC. 2025. Flood Emergency Response Plan (FIRA - Appendix E), page 11

Fire/Ambulance/ Police in an emergency. We **recommend** the FERP contact list is updated to reflect the correct contacts.

You may also find the following Guidelines on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Ana Chitu via email at rra@ses.nsw.gov.au should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'P. Cinque', is positioned above the printed name.

Peter Cinque
Senior Manager, Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹³

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan¹⁴ and the Parramatta LGA Flood Emergency Sub Plan,¹⁵ where evacuation is the preferred emergency management strategy for people impacted by flooding.

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed. Risk assessment should consider the full range of flooding, along with climate change considerations, in line with NSW Government guidelines.

Site access

Vehicular access is provided to the proposed development via Barrack Lane, with pedestrian access both via Barrack Lane and Georges Street. Two vehicle access points are provided, one for residential vehicles and one for service vehicles off Barrack Lane, and residential vehicles would be transported to the above ground carparking area via two car lifts.¹⁶

Flood risk

The site is affected by flash flooding, *“impacted by backwater effects from the Parramatta River during the Probable Maximum Flood (PMF) event. For all other design flood events, the site is influenced solely by local overland flow.”*¹⁷ The time to peak from the commencement of the storm in a PMF event is around 1.5 hours¹⁸ and the site is expected to be **isolated by floodwaters for up to six hours.**¹⁹

The modelling suggests that the site itself would be largely flood free up to the 0.2% AEP event.²⁰ It is understood that *“(..) the most significant area of flooding in the vicinity of the*

¹³ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

¹⁴ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

¹⁵ NSW SES. 2021. Parramatta LGA Flood Emergency Sub Plan, Section 1.6.2, page 7

¹⁶ Mecone. 2025. Environmental Impact Statement, page 63 - 64

¹⁷ SMEC. 2025. Flood Impact and Risk Assessment, page 13 & 29

¹⁸ SMEC. 2025. Flood Impact and Risk Assessment, page 29

¹⁹ SMEC. 2025. Flood Impact and Risk Assessment, page 34

²⁰ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B05

*subject site is along George Street (the northern boundary of the site), where shallow overland flow occurs in all rainfall events, ranging between 0.1 to 0.5 metres in most flood events up to, and including, the 0.2% AEP.²¹ Modelling of the 1% AEP event with climate change factor (2150 RCP 8.5 scenario) suggests there is a slight increase in flood depth in isolated parts of George Street, however flood depth peaks remain around 0.5 metres.²² However, we note that sections of George Street are categorised as **floodway** in events as frequent as the 5% AEP, with larger floodway sections in the 1% AEP and the 1% AEP + climate change modelling scenarios.²³*

The Flood Impact and Risk Assessment (FIRA) suggests that Barrack Lane remains largely flood free, while George Street *remains trafficable* with low hazard level of H1 for flood events up to the 0.2% AEP.²⁴

In the PMF event the site also becomes impacted by mainstream flooding from the Parramatta River, with the entire site inundated and buildings surrounded by floodwater with depths of up to 4 metres.²⁵ The broader road network is significantly flood-affected, with flood depths between 2 to 6 metres on the roads - including Georges Street and Barrak Lane, essentially cutting all access for the site.²⁶ In a PMF, almost the entire area surrounding the site, including the entire Georges Street and Barrack Lane access roads, is categorised as a **floodway**, with the exception of a flood storage section in the eastern part of the site.²⁷

The site is essentially a flood island, with access cut and the area around the buildings completely inundated by H5 – H6 hazard level in the PMF in both pre- and post-development conditions;²⁸ but with the building providing floor levels above the PMF, it may be classified as a **High Flood Island**.

Proposed floor levels

It is understood that Finished Floor Levels (FFS) for the Ground Floor area vary between 8.10 m AHD for the carpark entrance off Barrack Lane, 8.58 m AHD for the service entrance and around 8.6 m AHD for all other areas including retail and co-working spaces, concierge, the fire control room and one of the fire exits (P10), while the substations and an alternative fire exit are proposed at 9.6 m AHD.²⁹ However, the peak flood level at the site in a **PMF is 11.3 m AHD**, which would completely inundate the Ground Level trapping people within the

²¹ SMEC. 2025. Flood Impact and Risk Assessment, page 6 & Drawing B01 – B04

²² SMEC. 2025. Flood Impact and Risk Assessment, Drawing B05

²³ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B13, B14 & B17

²⁴ SMEC. 2025. Flood Impact and Risk Assessment, page 35 & Drawing B22

²⁵ SMEC. 2025. Flood Impact and Risk Assessment, page 6 & 21

²⁶ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B06

²⁷ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B18

²⁸ SMEC. 2025. Flood Impact and Risk Assessment, Drawing B24 & C24

²⁹ SMEC. 2025. Flood Impact and Risk Assessment, Table 3-5, page 25 - 26

building.³⁰ Levels 1 and 2 (parking and storage areas) and Level 3 (Community Spaces) appear to be above the PMF level, with Level 3 at 20.7 m AHD designated as the refuge area above the PMF for all occupants of the Ground Floor retail businesses (including staff and users). All residential apartments are being proposed on Level 4 and above.³¹

Flood emergency management strategy

It is understood that the proposal relies on a shelter in place strategy to manage flood emergencies at the site. Noting that all residential dwellings will be above PMF event (on Levels 4 and above), residents will be advised to shelter at home, while occupants of the flood affected Ground Floor tenancies will be advised to use the communal refuge area on Level 3 for shelter.³²

We **emphasise** that the strategy of isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation and it should not be used to justify *future development*.

As the land around the building, including the surrounding roads, is impacted by high hazard H5 – H6 flooding in a PMF event, categorised as floodway, the proposal is not compliant with the Shelter in Place Guideline for flash flooding. We **recommend** the consent authority is satisfied that the proponent can demonstrate consistency with the [Shelter in Place Guideline](#) prior to consent being granted, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing (but not limited to):

- flooding occurs within less than 6 hours from the commencement of causative rain and the duration of shelter in place due to isolation by floodwater is less than 12 hours from the commencement of rainfall (8b)
- the development is not subject to high hazard flooding (e.g. floodways, high hazard H5 or H6 areas) or surrounding roadways are not subject to high hazard flooding (8c)
- an understanding of the secondary risks and how the proponent proposes they will be managed is outlined in the FIRA. Secondary risks include medical emergencies, building fire, health and wellbeing. (10)

We **recommend** considering an alternative approach such as closing the ground floor area early, prior to start of the business day, if there is a risk of flooding or isolation of the site, for example on receipt of a Severe Weather/Thunderstorm Warning (SWW/STW) to mitigate risk to life, particularly considering the significant difference between the Ground Floor levels/building openings of 8.1 - 8.6 m AHD and the 11.3 m AHD expected PMF flood level at

³⁰ SMEC. 2025. Flood Impact and Risk Assessment, Figure 4-6, page 34

³¹ SMEC. 2025. Flood Impact and Risk Assessment, Figure 4-6, page 34

³² SMEC. 2025. Flood Impact and Risk Assessment, page 34 - 35

the site,³³ that would pose a significant risk to life. While SWW/STW are not flood height or time accurate and could result in false alarms, this approach is intended to preserve life in a severe flood event if the proposal proceeds.

We also **recommend** that the Flood Emergency Response Plan (FERP) should be updated with clear triggers to take action during a flood event instead of “*when it becomes necessary to shelter on site.*”³⁴ Noting the flash flooding environment with little to no warning time and rapid rate of rise, it will be late to commence shelter in place procedures “*as floodwaters approach building entryways,*”³⁵ particularly considering the risk of severe over floor inundation, of up to around 2.7 – 3.2 metres,³⁶ of the Ground Floor level in the PMF event. We **recommend** that if the opportunity is missed to close the Ground Floor part of the building before the onset of heavy rainfall (and broader road network becomes impacted by flooding), consider proactively relocating people from the GF to the Level 3 refuge area, rather than waiting until flooding of the entry ways.

Noting the H5 – H6 flooding impacts against the proposed building in a PMF event, we **recommend** building design that considers the potential flood and debris loadings of the PMF so that structural failure is avoided during a flood. **We highlight** that under a H5 flood hazard level, all buildings are vulnerable to structural damage and at H6 all building types are considered vulnerable to failure.³⁷

Considering the significant inundation of the Ground Floors, including lifts openings, that can occur in a PMF event, we **advise careful consideration** of safety features for proposed lifts (both for people and vehicle) at the design stage, to mitigate floodwater impacts and ensure people do not exit into flooded areas. All site users must be made aware of the flood risks and dangers of using the lifts during flood events, as this will pose a direct risk to life for any persons who may attempt to do so.

In addition, we **highlight** that the 132 500 phone number in the Emergency Contact List (Table E1)³⁸ is the NSW SES State Operations Centre contact and not the Fire/Ambulance/Police as noted in the FERP. The 000 emergency service number is to be used to contact Fire/Ambulance/ Police in an emergency. We **recommend** the FERP contact list is updated with the correct contacts.

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

³³ SMEC. 2025. Flood Impact and Risk Assessment, page 25 – 26 & 34

³⁴ SMEC. 2025. Flood Emergency Response Plan (FIRA - Appendix E), page 8

³⁵ SMEC. 2025. Flood Emergency Response Plan (FIRA - Appendix E), page 9

³⁶ SMEC. 2025. Flood Impact and Risk Assessment, page 25 – 26 & 34

³⁷ Department of Planning and Environment. 2023. Flood risk management guideline FB03, Flood Hazard - Figure 1 General flood hazard vulnerability curve, page 3

³⁸ SMEC. 2025. Flood Emergency Response Plan (FIRA - Appendix E), page 11

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing flood risks associated with **High Flood Islands** requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

- **Isolation** – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- **Secondary risks** – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- **Consideration of human behaviour** – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Principle 5 Risks faced by the itinerant population need to be managed.

Any Emergency Management strategy needs to consider people visiting the area or using a development.

Principle 6 Recognise the need for effective flood warning and associated limitations.

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner.

As the site is affected by flash flooding there are no Bureau of Meteorology quantitative flood warnings available. Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall, which will not provide the community time to respond to a flood threat in an appropriate manner.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

Development within a floodplain will necessitate ongoing involvement from the NSW State Emergency Service (SES) in community awareness, preparedness, and response activities. It is essential that all site users, both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life. This includes:

- Raising awareness of flood risk
- Strengthening community connections
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Importantly, a private flood management plans is insufficient to address flood risk on this site.

Residents and users of the proposed development should be made aware of their flood risk and be encouraged to use available tools and resources, including:

- **Hazards Near Me app** – part of the Australian Warning System, providing timely flood warnings
- [NSW SES website](#) – offering comprehensive guidance on flood preparedness, response, and recovery, including multilingual resources
- [HazardWatch](#) – an interactive platform for accessing real-time flood information and warnings