

From: [Bretton Coghlan](#)
To: [Do-Not-Reply IPCN Submissions Mailbox](#)
Subject: Fw: Submissions now open on additional material for Novus Build to Rent 39 to 43 Hassall Street, Parramatta project (SSD-34919690)
Date: Thursday, 14 March 2024 4:40:54 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good afternoon and thank you for the opportunity to respond to the additional material.

Regardless of the new information presented by the Department of Planning, Housing and Infrastructure (including material from the Applicant), the assessment and opinions of the various experts and consultants quoted in the report are based on assumptions and data of perceived scenarios that in recent years are proving to be underestimates and inaccurate. In the past 5 years or so the number of large scale flood events across Australia are showing that individual properties, streets and entire suburbs/towns identified as being in the 1% AEP have been subjected to unprecedented and historical flooding events which were not anticipated. Many flood events in Queensland, Northern NSW and around Sydney have shown that a 1% AEP flood event can occur several times in a 12 month period, suggesting these assessments are no longer accurate. The links below are a small sample of media reports in the last few years in relation the flooding in NSW, however a quick search on Google using terms of “historical flooding” or “unprecedented flood” and including geographical terms such as Australia, NSW, Queensland, Victoria, Sydney, Brisbane, Gold Coast, Melbourne produces page after page of media reports. Many of the quotes contained in these media report are from reliable sources including SES, emergency services personal, government officials (including minsters), university professors and industry experts who present as independent and not supporting new developments.

<https://www.smh.com.au/national/nsw/nine-minutes-to-flee-parramatta-s-catastrophic-flash-flooding-warning-20190214-p50xtv.html>

<https://www.smh.com.au/interactive/2022/lismore-flooding/>

<https://www.9news.com.au/national/nsw-flood-recovery-effort-begins-evacuation-orders-remain-hawkesbury-richmond-moree/ca78d501-a150-421f-a72c-619966d21803>

<https://www.news.com.au/technology/environment/grim-message-as-wild-weather-continues-for-sydney-and-surrounds/news-story/9eee9344a0b3770bb80bc5061403a771>

In isolation the proposed development may have been determined as having a small additional impact to the flood risk in this surrounding area, however cumulatively this and every other recent and proposed new development all add to the flood risk to the point that a perceived small risk becomes a large scale reality in the next east coast low or supercell rain event to impact the Parramatta area and upstream catchments.

The increases in flood risk, both through the proposed new development and climate change, will have an impact on adjoining and surrounding property owners whether a flood event directly impacts the adjoining and surrounding properties or not. Through claims based data and

research on potential flood risk insurance companies will continue to adjust premiums to cover the risk of flooding. Insurance premiums for adjacent and surrounding property owners to the proposed development may be raised to the point they are unaffordable (either directly to the property owners or indirectly through strata) or insurance against flood events is simply no longer available.

I am certainly not against development of new residential properties to ensure that housing, either through ownership or rental, is a commodity available to everyone, however such development needs to be built in areas that are affordable in a real sense to benefit potential owners and tenants, where infrastructure can support further densities of development, and not to the detriment of the suburb as a whole in terms of overcrowding and lack of required infrastructure to support additional residential densities including parking, open space, schooling, shopping, medical and service infrastructure (stormwater drainage, water, sewer, etc). Sydney and NSW are geographically large and the amount of vacant or underdeveloped land which have potential for true affordable housing in close proximity to existing transport, employment, education, medical and service infrastructure that would better suited to provide the same amount of affordable housing to the proposed development without further overcrowding of Parramatta and the adjoining suburbs.

Thank you for the time to read this submission and consider the points I have raised.

Regards

Bretton Coghlan
