

Our Ref: ID 3530
Your Ref: SSD-66876472

8 December 2025

Fadi Shakir
Department of Planning, Housing and Infrastructure
Locked Bag 5022, Parramatta NSW 2124

email: fadi.shakir@planning.nsw.gov.au
CC: amanda.pollock@ses.nsw.gov.au

Dear Fadi,

EIS for State Significant Development Application Berrima Hotel SSD-66876472

Thank you for the opportunity to provide advice on the Environmental Impact Statement (EIS) for the State Significant Development Application for Berrima Hotel, located at 2-4 Argyle Street, Berrima NSW. It is understood that the proposed development seeks to:

- Retain the grounds and layout of the estate while renovating to develop a hotel which will incorporate a café, restaurant, bar, community and event spaces.
- Construct a two-level underground car park with a multi-functional space / car park above on the south side of the site.
- Construct a 49-room hotel accommodation building along the Wingecarribee River adjoining the site's west boundary.
- Construct a new landscaped area near the site's northwest boundary and working garden area adjacent to the site's southeast boundary.
- Demolish a building near the site's northwest boundary and several smaller structures scattered across the site.

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

- Sutherland & Associates Planning, 2025. Environmental Impact Statement (SSD 66876472) Adaptive Reuse of the Former Berrima Gaol
- Martens, 2025. Appendix 25 - Flood Impact and Risk Assessment

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunamis 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 fully 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.

We note the site is above the 1% AEP flood event. Flooding from the 0.2% AEP event results in a small portion of the southwest corner of the site being inundated by shallow low hazard flood waters. Wingecaribee Street is only affected by shallow (< 100 mm) low hazard floodwaters in both the 1% AEP and 0.2% AEP events. the basement entrance is located above the 1% AEP and 0.2% AEP events as it is protected by the grading and crest levels of Wingecaribee Street.¹ In the PMF the southwest corner of the site is inundated due to water backing up in the Wingecaribee River and overland flows through Wingecaribee Street. We note Argyle Street travelling to the north from the site's east entrance is flood free in all events up to and including the PMF.²³⁴

In summary, NSW SES does not have significant concerns regarding this proposal, however:

- **Recommend** designing openings to the basement (ramp, vents, etc) to be situated above the Probable Maximum Flood (PMF) or 1% AEP plus freeboard, whichever is higher, if possible. If this is not feasible reconsider basement carparking as any openings to the basement are below the PMF will pose risk to life and property.

Please feel free to contact Gillian Webber 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 dark ink, appearing to read 'P. Cinque'.

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

¹ Sutherland & Associates Planning, 2025. Environmental Impact Statement Adaptive Reuse of the Former Berrima Gaol, page 79

² Sutherland & Associates Planning, 2025. Environmental Impact Statement Adaptive Reuse of the Former Berrima Gaol, page 30.

³ WMA Water, 2022. Wingecaribee River Flood Study Update. Probable Maximum Flood design event.

⁴ Martens, 2025. Appendix 25 - Flood Impact and Risk Assessment, page 17.

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁵

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 Plan and the Wingecarribee Shire Flood Emergency Sub Plan, where evacuation is the primary emergency management strategy for people impacted by flooding.

Please note, the NSW SES does not have statutory authority to endorse or approve flood emergency response plans. We advise that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.

Where shelter in place is proposed for emergency management we advise referring to the considerations in the [Shelter in Place Guideline](#) (DPHI, 2024) and considering the nature of flooding at the site **from all flood mechanisms impacting the site**, including demonstrating the following considerations:

- detailed assessment of evacuation off-site (the primary emergency management strategy) to determine that evacuation off-site is not achievable. (7)
- flash flooding is the only flood risk present at the site (8a)
- duration of isolation by floodwaters is less than 12 hours from the commencement of rainfall (8b)
- development is not subject to high hazard flooding or surrounding roadways are not subject to high hazard flooding (8c)

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. Climate change considerations should also be included, in line with NSW Government Guidelines.

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

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

⁵ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

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 flooding 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.

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

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase. However, it is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.