

Our Ref: ID 3575
Your Ref: SSD-73910208

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CC: amanda.pollock@ses.nsw.gov.au

Via Major Portal

Dear Aaron,

**NSW SES Advice on the Response to Submissions for the Seniors Housing IRT Woonona
Redevelopment SSD-73910208**

Thank you for the opportunity to provide advice on the State Significant Development Application Response to Submissions (RtS) for Seniors Housing IRT Woonona Redevelopment, 4-6 Popes Road, Woonona. It is understood that the proposed development consists of:

- Five apartment buildings containing Independent Living Units, consisting of 98 Independent Living Units
- Adaptive reuse of an existing church, to provide a café and staff amenities
- Alterations/additions to the existing residential care facility
- Wellness hub
- New basement level and at-grade parking for 182 car spaces (176 of which are basement car parking spaces)

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

- Colliers, 2025, Response to Submissions and Amendment Report
- ACOR, 2025, Flood Letter Re: IRT Woonona – SSDA Response
- ACOR, 2025, Updated Stormwater Management Report
- Water Technology, November 2025, Flood Emergency Response Plan
- Martens, 2025, Peer Review of Flood Assessment and Flood Emergency Response Plan

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 not fully addressed 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 PS24-001.

In summary, the key issues identified are:

- The proposed location of seniors housing within a high and medium flood risk precinct and increases the number of vulnerable occupants exposed to the flood risks.
- Rainfall forecasts carry inherent uncertainty and should not be considered a reliable indicator of flooding. Moreover, the current trigger, of 25% chance or more of 44 mm of rain within a 3-hour period¹, is likely to occur relatively frequently, which may lead to unnecessary disruption, increased complacency, and heightened anxiety.
- The proposal to shelter in place is inconsistent with the NSW Shelter in Place Guidelines and the Flood Risk Management Manual (2023) Principle 9, as the surrounding roads are impacted by high hazard flooding and relates to a sensitive use.
- The response to submissions is contradictory, particularly in relation to Appendix A Compliance Assessment² relating to the Wollongong Local Environmental Plan 2009 (LEP). It is evident that the proposal does not maintain existing flow patterns and overland flow function (5.21(2)(a)), flood mapping has not been produced to indicate no adverse impacts are observed offsite up to the PMF (5.21(2)(b) and 5.21(1)(c)), the proposed shelter in place emergency management strategy would not result in safe occupation or the ability to evacuate safely (5.21(2)(c)), and the evacuation routes do not remain accessible in design floods (5.21(1)(d), 5.22(1)(a) and 5.22(3)(a)).

If the proposal were to proceed, we recommend:

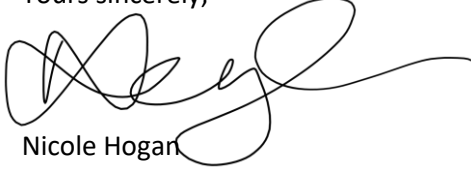
- undertaking longer duration flood modelling to confirm the potential maximum duration of isolation.
- investigating ways to improve the access and egress issues during frequent flood events, for example flood resilience improvements to the driveway to reduce the potential risks associated with the vulnerable occupants being isolated and or/driving through floodwater and frequency of evacuation.
- seeking advice from the Department of Climate Change, Energy, the Environment and Water and Wollongong City Council regarding preserving natural flood function and addressing the inconsistencies with the LEP.

Further information is in Attachment A. Please feel free to contact our team 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.

¹ Water Technology. 2025. 4-6 Popes Road Woonona FERP, page 47

² ACOR. 2025. Re: IRT Woonona – SSDA Response

Yours sincerely,



Nicole Hogan
Assistant Commissioner Director Emergency Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline³

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 Plan⁴ and the Illawarra (Wollongong) Local Flood Emergency Sub Plan⁵. Evacuation of hospitals and aged care can be complex and is known to be associated with an increased rate of mortality in patients and nursing facility residents.^{6 7 8} To minimise disruption to essential services, and to reduce the risks associated with evacuation of aged care facilities, the NSW 2022 Flood Inquiry recommends essential services infrastructure is situated as much as possible above the flood planning level and the PMF.

The proposal to shelter in place is inconsistent with the NSW Shelter in Place Guidelines and the Flood Risk Management Manual (2023) Principle 9, as the surrounding roads are impacted by high hazard flooding and relates to a sensitive use.

Rainfall forecasts have a degree of uncertainty and are not a reliable indication that flooding will occur. Further, the current trigger of 44mm of rain over a 3-hour period⁹ is likely to be a relatively frequent occurrence, and therefore be disruptive, increase complacency and anxiety at best.

Please note that NSW SES do not “give all clear”, and therefore this trigger should be removed from any FERP.¹⁰

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

³ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

⁴ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

⁵ NSW SES. 2023. Illawarra (Wollongong) Local Flood Emergency Sub Plan

⁶ Terui, T., Kunii, Y., Hoshino, H., Kakamu, T., Hikada, T., Fukushima, T., Anzai, N., Gotoh, D., Miura, I., Yabe, H. 2021. Long-term observation of mortality among inpatients evacuated from psychiatric hospitals in Fukushima prefecture following the Fukushima nuclear disaster. *Science Reports* 11, 14651.

⁷ Rojek A, Little M. 2013. Review article: evacuating hospitals in Australia: what lessons can we learn from the world literature? *Emergency Medicine Australasia*. DOI: [10.1111/1742-6723.12160](https://doi.org/10.1111/1742-6723.12160)

⁸ NSW Government. 2016. Evacuation Decision Guidelines for Private Health and Residential Care Facilities.

⁹ Water Technology. 2025. 4-6 Popes Road Woonona FERP

¹⁰ Water Technology. 2025. 4-6 Popes Road Woonona FERP, Appendix A

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.

Further, risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. Climate change should also be considered.

The site is identified as a High and Medium Flood Risk Precinct, with hydraulic hazards up to H5. It is noted that the site itself is partially prone to flooding from the stormwater channel to the north and Collins Creek to the south, in both the pre and post development conditions. Flooding and isolation occur at least as frequently as the 20% AEP (likely more frequent because of climate change), with hydraulic hazards reaching H5 and H6 in sections of the site. This is unsafe for people, vehicles and buildings may be subject to structural damage.

The time to onset of flooding is as little as 15 minutes, however duration of potential isolation is anticipated to be less than 6 hours¹¹. We recommend undertaking longer duration flood events to confirm the potential maximum duration of isolation. Historical events often have longer time of isolation than design events due to them often being caused by east coast lows that can be more prolonged.

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

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.

¹¹ Water Technology. 2025. 4-6 Popes Road Woonona FERP, page 47

The response to submissions is contradictory, particularly in relation to Appendix A Compliance Assessment¹² relating to the Wollongong Local Environmental Plan 2009 (LEP). It is evident that the proposal does not maintain existing flow patterns and overland flow function (5.21(2)(a)), flood mapping has not been produced to indicate no adverse impacts are observed offsite up to the PMF (5.21(2)(b) and 5.21(1)(c)), the proposed shelter in place emergency management strategy would not result in safe occupation or the ability to evacuate safely (5.21(2)(c)), and the evacuation routes do not remain accessible in design floods (5.21(1)(d), 5.22(1)(a) and 5.22(3)(a)). These inconsistencies should be adequately resolved.

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.

As the site is subject to flash flooding, there is limited opportunity for the community to respond to a flood threat in an appropriate and timely manner.

We emphasise that there are no flood watches or flood warnings issued for this catchment.

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 plan is insufficient to address flood risk on this site.

¹² ACOR. 2025. Re: IRT Woonona – SSDA Response