

Our Ref: ID 3576
Your Ref: SSD-83258708

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Via Major Portal

Dear Lucinda,

State Significant Development Application for EIS Florida Street, Sylvania, Affordable Housing SSD-83258708

Thank you for the opportunity to provide advice on the State Significant Development Application for 29 Florida Street, Sylvania. It is understood that the proposed development undertaken by Homes NSW consists of both social and market housing and seeks to construct eight residential buildings with a total of 484 dwellings, completed in 2 stages comprising:

- Stage 1 Social Housing lot including:
 - Demolition, remediation, tree removal, excavation and site works.
 - Construction of two residential buildings of 8 and 9 storeys with 159 social housing apartments and 2 levels of shared basement accessed from Pembroke Street.
 - Associated landscaping and communal open space.
 - Infrastructure servicing.
- Stage 2 Market Housing Lot including:
 - Demolition, remediation, tree removal, excavation and site works.
 - Construction of six residential buildings of between 7 and 9 storeys with up to 4 levels of basement parking.
 - Construction of new one-way access street from Florida Street.
 - Associated landscaping and public domain works.
 - Infrastructure servicing.
 - Lot consolidation and Torrens subdivision to create 2 lots.

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

- FPD Planning, 2025, Environmental Impact Statement

- Mott MacDonald, 2025, Flood Impact and Risk Assessment
- JMT Consulting, 2025, Transport Impact Assessment
- JBS&G, 2025, Preliminary and Detailed Site Investigation
- Mott MacDonald, 2025, Integrated Water Management Plan

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 not 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.

The site is affected by shallow overland flow as frequently as the 20% Annual Exceedance Probability (AEP) event.¹ During the PMF event, under current conditions, the site is largely inundated reaching depths of up to 0.5 metres² and Hazard Level 2 (H2).³ The level of hazard on roads surrounding the site is significantly higher, reaching H5. This level of hazard is unsafe for all people and vehicles with buildings requiring special engineering design and construction.

In summary, the key issues identified and further discussed in Attachment A are:

- **The proposed design increases flood hazard within the site posing a risk to life to site users.** By including the proposed mitigation measure of *"the channelisation of overland flows within the Site to the internal roadway"*⁴ the hazard within the site itself is increased in all flood events from the 20% AEP flood,⁵ with flooding within the site during the PMF increasing from H2 to H5.⁶
- **The proposal has not demonstrated consistency with the [Shelter-in-Place Guideline](#)** (NSW Government, 2024). The consent authority should request the proponent to demonstrate consistency with the Shelter-in-Place Guideline prior to granting

¹ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.1 Existing Scenario 20% AEP Flood Depth, Page 23

² Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.7: Existing Scenario PMF Flood Depth, Page 29

³ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.8 Existing Scenario PMF Flood Hazard, Page 30

⁴ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Section 7 Conclusion, Page 44

⁵ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.10 Developed Scenario 20% AEP Flood Hazard, Page 32

⁶ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.17 Developed Scenario PMF Flood Hazard, Page 39

consent, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing consideration:

- 8c. development is not subject to high hazard flooding or surrounding roadways are not subject to high hazard flooding.

If the proposal were to proceed, we provide the following additional advice:

- Recommend DPHI/consent authority includes the requirements for **all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF) or 1% AEP plus freeboard**, whichever is higher as a condition of consent. 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.

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 Kate Dawes 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 grey ink, appearing to read 'P. Cinque'.

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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁷

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 Plan⁸ and the Sutherland Shire Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.⁹

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.

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 affected by shallow overland flow as frequently as the 20% AEP event reaching depths of up to 0.2 metres within the site.¹⁰ During the PMF event, under current conditions, the site is largely inundated reaching depths of up to 0.5 metres¹¹ and Hazard Level 2 (H2).¹² The level of hazard on roads surrounding the site is significantly higher, reaching H5. This level of hazard is unsafe for all people and vehicles with buildings requiring special engineering design and construction.

The proposed design increases flood hazard within the site posing a risk to life to site users. By including the proposed mitigation measure of *“the channelisation of overland flows within the Site to the internal roadway”*¹³ the hazard within the site itself is increased. During flood events up to and including the 1% AEP flood the hazard is increased from H1,¹⁴ which is generally considered safe, to contain *“A peak flood hazard of H5 within the internal proposed roadway.”*¹⁵ This level of hazard is unsafe for all people and vehicles with buildings requiring

⁷ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

⁸ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

⁹ NSW SES, Sutherland Shire Flood Emergency Sub Plan, Endorsed March 2023, Section 5.8

¹⁰ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.1 Existing Scenario 20% AEP Flood Depth, Page 23

¹¹ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.7: Existing Scenario PMF Flood Depth, Page 29

¹² Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.8 Existing Scenario PMF Flood Hazard, Page 30

¹³ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Section 7 Conclusion, Page 44

¹⁴ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.6 Existing Scenario 1% AEP Flood Hazard, Page 28

¹⁵ Mott MacDonald, 2025, Flood Impact and Risk Assessment, 1% AEP Tuflow Results, Page 34

special engineering design and construction. During the PMF event under existing conditions flooding within the site is limited to H2,¹⁶ which is unsafe for small vehicles, while under proposed conditions it contains a H5 flow path through the site.¹⁷

This increase in hazard within the site, as well as the existing high hazard of surrounding roads is inconsistent with the [Shelter-in-Place Guideline](#) (NSW Government, 2024). The consent authority should request the proponent to demonstrate consistency with the Shelter-in-Place Guideline prior to granting consent, to ensure the risk to life is adequately managed and/or mitigated. This includes addressing consideration 8c. development is not subject to high hazard flooding or surrounding roadways are not subject to high hazard flooding. Applying a shelter-in-place strategy to new development surrounded by high hazard flooding poses a risk to life to site users who may attempt to leave or re-enter the site if they become trapped outside the site during flood events.

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 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 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

¹⁶ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.8 Existing Scenario PMF Flood Hazard, Page 30

¹⁷ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5.17 Developed Scenario PMF Flood Hazard, Page 39

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 little to no warning time is likely to be available with Severe Weather Warnings and Severe Thunderstorm Warnings from the Bureau of Meteorology the only warnings currently available.

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