

Our Ref: ID 3581
Your Ref: SSD-83721209

19 January 2026

Lachlan Hutton
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

email: lachlan.hutton@dpie.nsw.gov.au
CC: Claire.flashman@ses.nsw.gov.au

Dear Lachlan,

**State Significant Development Application for EIS Mixed-use development, 307-315
Parramatta Road SSD-83721209**

Thank you for the opportunity to provide advice on the State Significant Development Application for EIS Mixed-use development, 307-315 Parramatta Road. It is understood that the proposed development seeks concurrent rezoning and development consent for the site including:

- Amending the Inner-West Local Environmental Plan (LEP) 2022 provisions for floor space ratio and height of buildings for the site.
- Demolition of all structures.
- Excavation and earthworks.
- Development of a 16-storey shop-top housing development including:
 - Ground level commercial premises fronting Parramatta Road and the rear lane.
 - Residential units from level 1 to level 16 consisting of 154 units inclusive of 21 affordable units.
 - Residential access lobby from the rear lane.
 - 4 basement parking levels accessed from Redmond Street with a total of 175 spaces.
 - Service vehicle access from Redmond Street.
 - Landscape works at ground level, along with rooftop communal open space areas.
 - Rooftop plant including solar panels and hot water system.
 - Public domain works.

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

- Think Planners, 2025, Environmental Impact Statement.

- Mott MacDonald, 2025, Flood Impact and Risk Assessment.
- HJ Consult, 2025, Integrated Water Management Report.

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 isolated by flooding as frequently as the 10% Annual Exceedance Probability (AEP) event as all surrounding streets become inundated, with some areas reaching depths of up to 0.6 metres.¹ During the Probable Maximum Flood (PMF) event flooding on surrounding streets reaches depths of up to 1.5 metres,² with all streets reaching Hazard Level 5 (H5). This level of hazard is unsafe for all people and vehicles with buildings requiring special engineering design and construction.

In summary, the key issue identified, and further discussed in Attachment A, is:

- **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 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.

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

¹ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5-3 Parramatta Road Existing Condition 10% AEP Flood Depth and Extent, Page 32

² Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5-9 Parramatta Road Existing Condition PMF Depth and Extent, Page 36

interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,



Peter Cinque
Senior Manager, Emergency Risk 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 Inner West Council Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.⁵

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.

It is noted that the site is isolated by flooding as frequently as the 10% AEP event as all surrounding streets become inundated, with some areas reaching depths of up to 0.6 metres.⁶ During the PMF event flooding on surrounding streets reaches depths of up to 1.5 metres,⁷ with all streets reaching H5. This level of hazard is unsafe for all people and vehicles with buildings requiring special engineering design and construction.

The site is classified as a High Flood Island, as per EM01 Support for Emergency Management Planning, as it becomes isolated by flooding on all surrounding streets. As noted in the FIRA *“this limits the options available for a flood-free evacuation route.”*⁸ The FIRA further discusses a Shelter-in-Place strategy but has not fully addressed the Shelter-in-Place Guideline for Flash

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, Inner West Council Flood Emergency Sub Plan, Endorsed October 2023, Section 5.8

⁶ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5-3 Parramatta Road Existing Condition 10% AEP Flood Depth and Extent, Page 32

⁷ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5-9 Parramatta Road Existing Condition PMF Depth and Extent, Page 36

⁸ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Section 5.1.5.3 Probable Maximum Flood (PMF) Flood Hazard, Page 37

Flooding, including addressing consideration 8c. development is not subject to high hazard flooding or surrounding roadways are not subject to high hazard flooding.⁹

While the FIRA notes *“redevelopment which caters for sheltering in place can be used to reduce existing risk to life for individuals who currently occupy the floodplain but it is likely to increase the number of individuals at risk”*¹⁰, it should be noted that a Shelter-in-Place strategy in an area bounded by high hazard flooding poses a risk 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.

Basement car parks have inherent risks to life and property¹¹ and can often restrict safe evacuation of the occupants. NSW SES support the adopted strategy of locating all entry points to the basement, including vents and crest levels, *“above the Probable Maximum Flood Level or Flood Planning Level, whichever is the higher, and a clearly signposted flood free pedestrian evacuation route is provided from the basement area.”*¹²

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.

⁹ Department of Planning Housing and Infrastructure, 2024, Shelter-in-Place Guideline for Flash Flooding

¹⁰ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Section 7 Conclusion, Page 65

¹¹ Collier, L. Phillips, B., and Griffin, M. 2017. Basement Development in the Floodplain. Floodplain Management Australia Conference. Newcastle, 2017

¹² Mott MacDonald, 2025, Flood Impact and Risk Assessment, Section 3 Design Controls, Page 19

- 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 short duration flash flooding reaching its peak in less than one hour, as demonstrated by the provided hydrographs,¹³ 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 for the site.

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:

¹³ Mott MacDonald, 2025, Flood Impact and Risk Assessment, Figure 5-10 Onset and Duration of PMF, Page 37

- **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