Our Ref: ID 3819
Your Ref: SSD-86017721

14 May 2026

Adela Murimba
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via email

email: adela.murimba@dpie.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Adela,

State Significant Development Application for Residential development with in-fill affordable housing - 23-31 Dover Road, Rose Bay (RTS)

Thank you for the opportunity to provide advice on the State Significant Development Application for Residential development with in-fill affordable housing, 23-31 Dover Road, Rose Bay. It is understood that the proposed development seeks consent for:

- Demolition of existing buildings on site and tree removal.
- Construction of a residential flat building comprising two levels of basement car parking, eight storeys of residential dwellings containing 49 apartments, communal open space and associated landscaping.
- Erection of an impervious wall along Dover Road frontage, as wall as the eastern lot boundary. Openings will be provided at the pedestrian and vehicular entries from Dover Road.

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

- Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment
- Urbis, 2026, Response to Submissions Report

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 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

STATE HEADQUARTERS
93 - 99 Burelli Street, Wollongong 2500
PO Box 6126, Wollongong NSW 2500
P (02) 4251 6111
F (02) 4251 6190
www.ses.nsw.gov.au
ABN: 88 712 649 015

Management Planning and relevant planning circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including 4.1 Flooding and PS24-001.

We refer to our previous correspondence dated 21 July 2025 and 1 December 2025. We note and appreciate the revisions to modelling as shown in the Revised Flood Impact and Risk Assessment (FIRA).

In summary, we offer the following additional advice:

- **Reiterate the proposal has not adequately demonstrated consistency with the** Shelter in Place Guideline (NSW Government, 2024). DPHI, as 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 adequately addressing considerations:
    - 7. the assessment of evacuation off-site (the primary emergency management strategy) to determine that evacuation off-site is not achievable.
    - 8c. development is not subject to high hazard flooding or surrounding roadways are not subject to high hazard flooding.
    - 10. an understanding of secondary risks and how the proponent proposes they will be managed.
- Recommend the analysis of the **impact of flooding on the roadways should go beyond immediately adjacent to the site** to fully understand the isolation risks and evacuation constraints.
- Emphasise **NSW SES does not support any strategy which requires people to enter flood water** regardless of the level of hazard.

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,

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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[1]

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 [2] and the Waverley Council and Woollahra Council Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.[3]

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 a High Flood Island which is isolated by low level overland flooding as frequently as the 10% Annual Exceedance Probability (AEP) event,[4] with flooding on streets surrounding the site reaching Hazard Level 5 (H5).[5] During the PMF flooding on site reaches up to 0.5 metres and "*H5 can occur on Dover Road, and up to H3 within the site. The PMF behaviour on Dover Road along the site frontage would be hazardous to people and vehicles and poses a risk to life*."[6]

While the revised modelling in the FIRA shows the level of hazard on Dover Street along the site frontage remains at H1, which is generally safe, in all events up to and including the 1% AEP flood the modelling shows only the area immediately surrounding the site and does not include access/egress routes. We recommend the analysis of the impact of flooding on the

[1] NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline
[2] NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34
[3] NSW SES, Waverley Council and Woollahra Council Flood Emergency Sub Plan Flood Emergency Sub Plan, Endorsed December 2021, Section 5.8
[4] Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment, Figure 14: Peak Floodwater Depths and Levels for the 10% AEP Event for Post-Development Conditions, Page 58
[5] Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment, Figure 23: Peak Flood Hazard for the 10% AEP Event for Post-Development Conditions, Page 67
[6] Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment, Section 7 Summary, Page 36

roadways should go beyond immediately adjacent to the site to fully understand the isolation risks and evacuation constraints.

Further while the Revised FIRA states "*The proposed ground floor levels, along with the basement carpark protection (crest) will all be located above the peak level of the PMF event. Therefore, evacuation is not required during any flood event, and it is considered that the most appropriate emergency response during all future floods is to "shelter in place"*"[7] the proposal has not demonstrated consistency with the Shelter-in-Place guideline. While considerations of the Shelter-in-Place guideline have been listed as part of the response to NSW SES comments table, they have not been adequately addressed only stating "*shelter in place is not required in all events up to and including the 1% AEP, with only an extremely short period of isolation in the PMF (<50 minutes).*"[8]

As the FIRA demonstrates the only access/egress from the site is via Dover Road, which is inundated by flooding as frequently as the 10% AEP event[9] and the assessment has not included streets leading to areas outside the flood extent it may not accurate to state Shelter-in-Place is not required in more frequent flood events. NSW SES does not support any strategy which requires people to enter flood water regardless of the level of hazard.

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.

[7] Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment, Section 3.5 Emergency Response Considerations, Page 14
[8] Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment, Table 6
[9] Catchment Simulation Solutions, 2026, Revised Flood Impact and Risk Assessment, Figure 14: Peak Floodwater Depths and Levels for the 10% AEP Event for Post-Development Conditions, Page 58

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.
- 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 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 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
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Importantly, a private flood management plan is insufficient to address flood risk on this site.