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

Via Major Portal

email: paula.bizimis@planning.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Paula,

State Significant Development Application for 36-46 George Street & 16-24 and 26 Elsie Street, Burwood (EIS)

Thank you for the opportunity to provide advice on the State Significant Development Application for 36-46 George Street & 16-24 and 26 Elsie Street, Burwood. It is understood that the proposed development seeks to undertake a concurrent rezoning and development of two sites to provide **approximately 1,079 apartments** including:

- Amend the building height, floor space ratio and maximum residential floor space controls across the two sites.
- Construction of a mixed-use development across two sites comprising:
 - Site A accommodating 2 residential towers of 47 and 41-storeys, delivering approximately 751 apartments above a 2-storey podium and 8 levels of basement parking. The podium will include retail, commercial space, childcare centre and communal facilities with a sky bridge connection between the two towers.
 - Site B accommodating a 44-storey residential tower containing approximately 328 apartments above a 2 storey podium and 8 levels of basement parking with retail, commercial uses and facilities.

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

- Gyde, 2026, Environmental Impact Statement
- Telford Civil, 2026, Flood Risk Management 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 recommend flooding issues are considered 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 PS26-001.

Both sites become isolated due to the surrounding streets becoming inundated as frequently as the 10% Annual Exceedance Probability (AEP) event.¹ Site B is identified as a Low Flood Island² within the Flood Planning Area³ and first becomes inundated from the north-eastern corner of the site during the 2% AEP event,⁴ reaching depths in excess of 1 metre during the Probable Maximum Flood (PMF) event.⁵ Site A becomes inundated between the 1% AEP and PMF events reaching up to 0.5 metres in depth,⁶ with flooding largely concentrated in the location of the proposed basement entry.⁷

In summary, we:

- **Recommend the Department of Planning, Housing and Infrastructure request the Flood Impact and Risk Assessment (FIRA) to be updated to address existing and post-development conditions⁸ to understand the full extent of the flood risk to the proposed site and existing communities. This includes:**
 - depth, velocity and hydraulic hazard of any flooding, including on access/egress routes.
 - an assessment of the flood risk, including overland flooding for the full range of flood events up to and including the PMF on site and surrounding access/egress routes.
 - climate change considerations.

¹ WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 13 Peak Flood Depths and Flood Level Contours 10% AEP, Page 84

² WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 27 Preliminary Flood Emergency Response Classification of Communities, Page 98

³ WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 28 Flood Planning Area, Page 99

⁴ WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 15 Peak Flood Depths and Level Contours 2% AEP

⁵ Telford Civil, 2026, Flood Risk Management Plan, Appendix C Council Flood Information, Figure 2 PMF Peak Flood Depth and Peak Flood Level Contours, Page 37

⁶ Telford Civil, 2026, Flood Risk Management Plan, Appendix C Council Flood Information, Figure 2 PMF Peak Flood Depth and Peak Flood Level Contours, Page 34

⁷ Telford Civil, 2026, Flood Risk Management Plan, Appendix B Architectural Plans, Page 25

⁸ Department of Planning and Environment, 2023, LU01 Flood Risk Management Guideline: Flood Risk and Impact Assessment

- time to onset, duration of isolation.
- an assessment of the impact of the proposed development on flood behaviour.
- demonstrating consistency with the [Shelter in Place Guideline](#) (NSW Government, 2024) or EM01 Flood Risk Management Guideline: Support for Emergency Management (NSW Government, 2023).
- **Recommend 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,



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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁹

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 Plan¹⁰ and the Canterbury-Bankstown Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.¹¹

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.

Both sites become isolated due to the surrounding streets becoming inundated as frequently as the 10% AEP event.¹² Site B first becomes inundated from the north-eastern corner of the site during the 2% AEP event,¹³ reaching depths in excess of 1 metre during the PMF event.¹⁴ Site B is identified as a Low Flood Island¹⁵ and as being within the Flood Planning Area by the Exile Bay, St Lukes and William Street Flood Study.¹⁶

⁹ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

¹⁰ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

¹¹ NSW SES, Canterbury-Bankstown Flood Emergency Sub Plan, Endorsed September 2021, Section 5.8

¹² WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 13 Peak Flood Depths and Flood Level Contours 10% AEP, Page 84

¹³ WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 15 Peak Flood Depths and Level Contours 2% AEP

¹⁴ Telford Civil, 2026, Flood Risk Management Plan, Appendix C Council Flood Information, Figure 2 PMF Peak Flood Depth and Peak Flood Level Contours, Page 37

¹⁵ WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 27 Preliminary Flood Emergency Response Classification of Communities, Page 98

¹⁶ WMA Water, 2019, Exile Bay, St Lukes and William Street Flood Study, Figure 28 Flood Planning Area, Page 99

Site A becomes inundated between the 1% AEP and PMF events reaching up to 0.5 metres in depth,¹⁷ with flooding largely concentrated in the location of the proposed basement entry.¹⁸

The Flood Impact and Risk Assessment (FIRA) provided has not included any modelling of velocity or hydraulic hazard and has not considered the full range of flood events. **The consent authority should request the Flood Impact and Risk Assessment (FIRA) to be resubmitted to adequately address existing and post-development conditions, in accordance with the NSW Government Guidelines in order to understand the full extent of the flood risk to the proposed site and existing communities. This includes depth, velocity and hydraulic hazard of any flooding, including on access/egress routes, an assessment of the flood risk, including overland flooding for the full range of flood events up to and including the PMF on site and surrounding access/egress routes and time to onset, duration of isolation.**

The FIRA should also include climate change considerations. While the FIRA states *“Given the limited extent of flooding across the site, the potential impacts associated with climate change are expected to be minimal”*¹⁹ It includes no discussion of or justification for this statement.

Further the proposal should demonstrate consistency with the NSW Government Shelter-in-Place Guideline for Flash Flooding. The FIRA adopts a SIP strategy and states *“This vertical refuge strategy provides safe shelter-in-place options for residents and other occupants during extreme flood events and is consistent with Council’s flood evacuation provisions”*²⁰ but has not addressed any of the SIP considerations or demonstrated the suitability of this strategy.

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.

¹⁷ Telford Civil, 2026, Flood Risk Management Plan, Appendix C Council Flood Information, Figure 2 PMF Peak Flood Depth and Peak Flood Level Contours, Page 34

¹⁸ Telford Civil, 2026, Flood Risk Management Plan, Appendix B Architectural Plans, Page 25

¹⁹ Telford Civil, 2026, Flood Risk Management Plan, Sears Compliance, Page 2

²⁰ Telford Civil, 2026, Flood Risk Management Plan, Flood Evacuation Route and Flood Rescue, Page 13

Basement car parks have inherent risks to life and property²¹ and can often restrict safe evacuation of the occupants. This can be managed through building design, such as crest levels above a certain level (e.g. the PMF) to prevent water ingress and flooding.

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 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 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 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

²¹ Collier, L. Phillips, B., and Griffin, M. 2017. Basement Development in the Floodplain. Floodplain Management Australia Conference. Newcastle, 2017

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

Importantly, a private flood management plan 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