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Your Ref: SSD-80441462

24 June 2026

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

Via email

email: christopher.eldred@planning.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Christopher,

Waterloo Mixed Use Development 881-885 Bourke Street (RTS)

Thank you for the opportunity to provide advice on the Response to Submissions (RtS) for the proposed Waterloo Mixed Use Development at 881-885 Bourke Street. It is understood that the proposed development seeks to develop 9 residential and mixed-use buildings across four development parcels, and changes to the proposal since the EIS stage include:

- Reduced building heights and envelopes of the Building 3A tower and Parcel 2 buildings
- Refinements to internal apartment layouts
- Realignment of precinct's affordable housing offering to be consistent with City of Sydney provisions
- Adjustments to rooftops, basements and plant areas
- Redesign of Parcel 1 facades and layouts
- Replanning of Parcel 4, including relocation of the substation within the basement
- Changes to ground floor uses including introduction of a small-format grocer and improved gym and lobby arrangements
- Changes to the Gross Floor Area (GFA) and Floor Space Ratio (FS)
- Corrections to maximum height for parcels 1, 3 and 4, and corrections to maximum storeys for parcels 1 and 2
- Reconfiguring of communal spaces and amenities
- Changes to the basement layout, including a reduction in basement parking spaces from 537 car parking spaces to 426 car parking spaces
- Reduction in communal open space from 5,021m² to 4,450m².

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

- Colliers, 2026, *Submissions Report Waterloo Mixed Use Development 881-885 Bourke Street*
- Colliers, 2026, *Appendix A – Detailed Response to Submissions Table*
- Stantec, June 2026, *881-885 Bourke Street, Waterloo, Flood Impact and Risk Assessment (Main Works Application)* [FIRA]
- Stantec, June 2026, *881-885 Bourke Street, Waterloo, Flood Emergency Response Plan (Main Works Application)* [FERP]

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.

In summary, we note the inclusion of finished floor levels (FFL) in the FIRA, and that most of the building entrances are located above the PMF level except for one on the southwestern part of the development.¹ It is unclear if the height of the 1% AEP + 0.5m is higher or lower than the PMF, and we reiterate that the proposed level of the basement ramp entries should be 1% AEP + 0.5m or PMF, **whichever is higher**.

While we note and appreciate that previous inconsistencies in proposed evacuation strategies have been addressed in this revised FERP, we reiterate that proposal has not demonstrated consistency with the Shelter in Place Guideline (NSW Government, 2024) or EM01 Flood Risk Management Guideline: Support for Emergency Management (NSW Government, 2023). We recommend the Department of Planning, Housing and Infrastructure (DPHI) **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, that the FIRA should show the 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 recommend considering updates to the FERP, as detailed in Attachment A.

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 Claire Flashman 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 Stantec, June 2026, FIRA, Appendix B, page 89.

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

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'P. Cinque', is positioned above the printed name.

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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline²

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 Plan³ and the City of Sydney Local Flood Plan⁴. Evacuation must not require people to walk or drive through floodwater.

We appreciate that the proposed primary strategy in the FERP has been more clearly clarified and note the FERP states that the suggested road route during flood events is to be for emergency access only. We recommend the following additional changes to the FERP:

- Update the FERP⁵ to note the primary location for accessing Severe Weather Warnings and Severe Thunderstorm Warnings is from the BoM Website or from the BoM app. We also recommend people who use the app to set up rain and warning notifications for their area.
- Ensure to not pluralise the agency name for the NSW State Emergency Service (i.e. should be State Emergency Service, not “Services”⁶).
- Remove references to “evacuation orders” and “evacuation warnings” within the documents, these should be replaced with Australian Warning System warning levels of: Advice, Watch and Act, and Emergency Warning.
- We recommend considering ways to minimise flood risks for people with greater accessibility needs, including through building design (e.g. ramps) and information distribution (e.g. signage). You may find the accessibility resources on NSW SES’s website useful, including Easy Read resources: <https://www.ses.nsw.gov.au/accessibility-resources>.

The consent authority must be satisfied that the proposal complies with Shelter in Place Guideline (NSW Government, 2024) and EM01 Flood Risk Management Guideline: Support for Emergency Management (NSW Government, 2023), including consideration of secondary risks and suitability of shelter facilities. Any proposed refuge location must be above the height of the PMF and align with the design criteria in the NSW Government shelter-in-place for flash flooding Guideline⁷ and the Red Cross Preferred Sheltering Practices for Emergency

² NSW Government. 2023. Principles Outlined in the *Support for Emergency Management Planning Guideline*.

³ NSW Government. 2024. *NSW State Flood Plan*. Section 5.1.7, page 34.

⁴ NSW SES, 2023, City of Sydney Local Flood Plan, Section 5.8, page 16.

⁵ Stantec, June 2026, *FERP*, Section 7.1.3, page 9.

⁶ Stantec, June 2026, *FERP*, Section 7.2, page 9.

⁷ NSW Department of Planning, Housing and Infrastructure. 2024. *Shelter-in-place guideline for flash flooding*, page 6.

Sheltering in Australia,⁸ including water supply, waste management, sanitation, food, and shelter and space management.

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 consider the impacts of climate change on the flood risk in line with latest NSW Government Guidelines and the latest Australian Rainfall and Runoff Guideline.

It is noted that the intersection of Young St and Danks St becomes inundated prior to a 10% AEP event,⁹ and that the site itself is prone to flooding in a PMF event with hazards of up to H5 flooding directly adjacent to the proposed buildings along Young Street.¹⁰ This hazard is unsafe for all people and vehicles, and any buildings exposed to this hazard are vulnerable to structural damage.¹¹

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

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing risks associated with flash flooding requires careful consideration of development type, likely users, and their ability to 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

⁸ Smith, C., and Parsons, C. 2015. *Preferred Sheltering Practices for Emergency Sheltering in Australia*. Retrieved from <https://www.redcross.org.au/globalassets/cms/emergency-services/sheltering-resources/preferred-sheltering-practices-handbook.pdf>

⁹ Stantec, June 2026, *FIRA*, Section 7.1.1, page 18.

¹⁰ Stantec, June 2026, *FIRA*, Appendix A Flood Maps, Developed Flood Hazard PMF, page 80.

¹¹ AIDR, 2017, Guideline 7-3 Flood Hazard, Figure 6, page 10.

for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

We note the proposed basement entry levels are stated as being above the PMF, however we recommend ensuring the proposed level of the basement ramp entries should be 1% AEP + 0.5m or PMF, **whichever is higher**. Basement car parks have inherent risks to life and property¹² and can often restrict safe evacuation of the occupants.

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.

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.

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

¹² Collier, L. Phillips, B., and Griffin, M. 2017. *Basement Development in the Floodplain*. Floodplain Management Australia Conference. Newcastle, 2017.