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Your Ref: SSD-61389706

14 April 2025

Tuongvi Doan
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: Tuongvi.Doan@planning.nsw.gov.au
CC: helen.slater@ses.nsw.gov.au

Dear Tuongvi,

State Significant Development Application for Uniting War Memorial Hospital Waverley

Thank you for the opportunity to provide comment on the State Significant Development Application for Uniting War Memorial Hospital Waverley on a number of lots on Birrell Street, Church Street, Carrington Road and Bronte Road, Waverley. It is understood that the proposed development seeks to expand the existing War Memorial Hospital to construct and operate seniors housing. This includes:

- Earthworks, of cut and fill
- Demolition of existing structures
- Adaptive reuse of 3 buildings
- Augmentation of existing services and infrastructure
- Construction of a basement car parking, comprising 478 car parking spaces
- Construction of a six-storey Residential Aged Care Facility (RACF) with 105 beds, consulting rooms and ancillary facilities.
- Construction of a seven-storey Independent Living Unit building with 231 units (23 of which will be affordable)
- Construction of a proposed driveway on Bronte Road and secondary driveways on Birrell Street
- Site remediation and associated landscaping.

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.

The NSW SES recommends that consideration of flooding issues is undertaken 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 directions under the *Environmental Planning and Assessment Act, 1979*. Some of the key considerations relating to emergency management are further detailed in Appendix A.

In summary, we do not have any significant concerns regarding the proposal. The Waverley LGA Flood Study¹ does not identify the area as at significant flood risk. However, we do recommend ensuring the flood risk on the site is confirmed in the Environmental Impact Assessment.

You may also find the following Guidelines available 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 me 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,



Elspeth O'Shannessy
Manager Emergency Risk Assessment
NSW State Emergency Service

¹ BMT. 2021. Waverley LGA Flood Study.

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 evacuation strategies identified in the NSW State Flood Plan³ and the Waverley Woollahra Flood Emergency Sub Plan⁴.

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. Climate change should also be considered.

Noting that the Waverley Flood Study⁵ does not identify the site at significant risk of flooding.

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:

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. 2021. Waverley Woollahra Flood Emergency Sub Plan.

⁵ BMT. 2021. Waverley LGA Flood Study.

- 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.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response requirements.