

Our Ref: ID 3101
Your Ref: SSD-72816207

22 May 2025

Edwina Ross
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: edwina.ross@dpie.nsw.gov.au
CC: helen.slater@ses.nsw.gov.au

Dear Edwina,

State Significant Development Application for 9 Burroway Road, Wentworth Point

Thank you for the opportunity to provide comment on the State Significant Development Application for 9 Burroway Road, Wentworth Point. It is understood that the proposed development seeks consent for a mixed use development within proposed lot 2 comprising:

- A total GFA of approximately 42,800sqm delivering ground floor retail and up to 412 residential apartments.
- 15% of floor space as affordable housing delivering up to 61 affordable apartments.
- Above ground parking, sleeved with retail and residential across three levels.
- A maximum building envelope of up to nine storeys with a three storey street wall.
- A new public plaza.
- A proposed shared zone connecting Burroway Road and Ridge Road.
- A 25m wide foreshore promenade to Homebush Bay.

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 recommend:

- **Undertaking** further modelling for the site including:
 - an assessment of the flood risk, including overland flooding up to and including the PMF on site and surrounding access/egress routes.
 - climate change considerations.
 - time to onset, duration of isolation.
 - depth, velocity and hydraulic hazard of any flooding, including on access/egress routes.
 - an assessment of the impact of the proposed development on flood behaviour.
 - consideration of the site against the requirements outlined in the NSW Government Shelter in Place Guideline.

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 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,

A handwritten signature in black ink, appearing to read 'Elspeth O'Shannessy'.

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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹

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 Plan² and the Parramatta LGA 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. 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.

We therefore recommend undertaking further modelling, with consideration of overland flooding and its impacts on the site and access/egress routes. While we note the site is not included in the Sydney Olympic Park Masterplan 2050 area, flood mapping available as part of the public exhibition documents⁴ shows significant overland flooding on all access/egress routes for the site. This would result in the site becoming isolated during the 1% AEP event with local street flooding reaching up to 0.5 metres in depth in current conditions.⁵

NSW SES has responded to multiple flood related requests in this area including multiple flood rescues of people trapped in vehicles along Hill Road, which forms the only access road to Wentworth Point, and other local roads.

Modelling for the site should include an assessment of the flood risk, including overland flooding up to and including the PMF on site and surrounding access/egress routes, climate change considerations, time to onset, duration of isolation, depth, velocity and hydraulic hazard of any flooding, including on access/egress routes as well as an assessment of the impact of the proposed development on flood behaviour.

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, Parramatta LGA Flood Emergency Sub Plan, Endorsed November 2021, Section 5.8

⁴ <https://pp.planningportal.nsw.gov.au/draftplans/under-consideration/sydney-olympic-park-master-plan-2050>, accessed 19 May 2025

⁵ Mott Macdonald, 2024, Sydney Olympic Park Master Plan 2050 Flooding Assessment Report, Figure 3.12: Existing 1% AEP Flood Depth Newington, Page 34

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 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.

During flooding it is likely that there will be a reduced capacity for the relevant emergency service agency to respond in these times. Even relatively brief periods of isolation, in the order of a few hours, can lead to personal medical emergencies that have to be responded to. The intensification of population in areas which become isolated due to roadway flooding risks increasing the reliance on emergency services for rescue and resupply during significant flood events.

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 isolated by overland 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 likely to be available. We recommend considering the requirements outlined in the NSW Government Shelter in Place Guidelines.

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

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase. However, it is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.

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