Our Ref: ID3455
Your Ref: SSD-80211463

12 November 2025

Michelle Niles
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124
Via Major Portal

email: michelle.niles@planning.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Michelle,

State Significant Development Application for Mixed Use Development & In-fill Affordable Housing, 164-194 William Street, Woolloomooloo

Thank you for the opportunity to provide comment on the State Significant Development Application for Mixed Use Development & In-fill Affordable Housing, 164-194 William Street, Woolloomooloo. It is understood that the proposed development seeks consent for:

- Demolition of existing structures and excavation for 4 basement levels.
- Construction of a mixed use precinct, comprising 4 buildings ranging in height from 6 storeys to 18 storeys, including:
    - 33,036sqm of gross floor area.
    - 227 apartments, comprising 167 market apartments and 60 affordable housing apartments.
- Ground floor and first flood retail uses along William Street.
- Four levels of basement for 293 residential parking spaces, 39 retails and visitor spaces and 24 motorcycle spaces.
- Vehicular and loading access from Forbes Street.
- A 1,356 sqm publicly accessible park.
- A new laneway, connecting Judge Lane to Dowling Street.
- Public domain works and improved through site links.

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 the consent authority:

- Ensures that **all openings to the basement (ramp, vents, etc) are situated above the 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.
- **Requests the proponent demonstrates consistency with the** Shelter in Place Guideline (NSW Government, 2024) prior to granting consent to ensure the risk to life is adequately managed and/or mitigated. The current proposal has not demonstrated consistency and the streets surrounding the site are inundated by high hazard flooding during the PMF event.[1]

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,

Peter Cinque
Senior Manager Emergency Risk Management
NSW State Emergency Service

[1] TTW, 2025, Flood Impact and Risk Assessment, Figure 26: PMF Hazard Levels at the Site Under Post-Development Conditions, Page 38

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[2]

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[3] and the City of Sydney Council Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.[4]

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 becomes isolated by shallow depth, high velocity flooding as frequently as the 10% Annual Exceedance Probability (AEP) event, with low level flooding up to 50mm depth inundating all surrounding streets.[5] During the Probable Maximum Flood (PMF) flooding on William Street, adjacent to the development, reaches depths of up to 500mm.[6] All surrounding streets reach Hazard Level 5 (H5) and isolated areas within the roadway reach Hazard Levels 6 (H6).[7] This level of hazard is unsafe for all people and vehicles.

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

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[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, City of Sydney Council Flood Emergency Sub Plan, Endorsed February 2023, Section 5.8
[5] TTW, 2025, Flood Impact and Risk Assessment, Appendix A 1: 10% AEP Flood Depths and Levels at The Site Under Existing Conditions, Page 59
[6] TTW, 2025, Flood Impact and Risk Assessment, Figure 24: PMF Depths and Levels at The Site Under Post-Development Conditions, Page 36
[7] TTW, 2025, Flood Impact and Risk Assessment, Figure 26: PMF Hazard Levels at the Site Under Post-Development Conditions, Page 38

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

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.