From:	Brendon Roberts
To:	John Wood; Lauren Turner
Cc:	Aaron Hogan; Angela Berryman
Subject:	RE: IRT Woonona - (SSD-73910208) Council"s Ref: DE-2025/70
Date:	Tuesday, 11 November 2025 8:17:18 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png

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Hi John

Many thanks for providing these additional comments on the Applicant's Flood Impact Assessment.

We can consider this as an addendum to Council's original submission, and will provide them to the Applicant to consider and respond as part of their Response to Submissions and amendment report.

We'll let Council know once this response to submissions is lodged, for your further consideration and response.

Kind regards

Brendon

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From: John Wood <JWood@wollongong.nsw.gov.au>
Sent: Tuesday, 11 November 2025 5:18 PM
To: Lauren Turner <lauren.turner@mmj.com.au>; Brendon Roberts <brendon.roberts@planning.nsw.gov.au>
Subject: IRT Woonona - (SSD-73910208) Council's Ref: DE-2025/70

Please be advised that Council has experienced issues with both the file upload and naming convention of the original submission package to the Department.

This matter has been taken up with the proponent and files uploaded direct to Council for cross-checking with the Department's record.

As a result the following comments are now provided from our development engineering section in relation to floodplain management matters:
In addition to Council's previous flooding / stormwater assessment, the applicant's Flood Impact Assessment (Appendix R), being a report authored by Acor Consultants titled 'Flood Report IRT Woonona – 4-6 Popes Road, Woonona NSW 2517' (Document No. NA230291-CIV-FLOOD-RPT-001, Revision 2 dated 26/5/2025), has been reviewed with consideration to Council's adopted floodplain management framework and the requirements of Chapters E13 and E14 of the Wollongong DCP 2009 and Clauses 5.21 and 5.22 of the Wollongong LEP 2009.
The following additional comments are provided in relation to the submitted Flood Impact Assessment

(Appendix R):

1. ***Collins Creek Flood Risk Management Study and Plan***
   Council has recently adopted the Collins Creek Floodplain Risk Management Study & Plan (FRMS&P) 2025. It is acknowledged that the SSD application was prepared prior to the adoption of this study and plan, however it is recommended that the applicants consultants undertake as risk analysis of the newly adopted study as the newly adopted Collins Creek FRMS&P dated 2025, includes updated hydrology, climate change allowances, and risk precinct mapping. The adopted model should be considered to ensure consistency with current policy and data.

2. ***No Flood Function or Risk Precinct Mapping***
   The report does not provide mapping of floodway, flood storage, or flood fringe areas, nor does it delineate Flood Risk Precincts (FRPs) consistent with Chapter E13 and Council's adopted FRMS&P. These are critical for assessing compatibility of land use and compliance with Chapter E13. Based on Council's adopted FRMS&P, some parts of the proposed development remain within High and Medium FRP, which is generally considered unsuitable for sensitive uses such as senior housing . See Clauses 5.21 and 5.22 of the Wollongong LEP 2009 and Chapter E13 of WDCP2009. Note that some encroachment into the Medium FRP can be considered only where the applicant demonstrate evacuation can safely occur consistent with the requirements of WDCP Chapter E13. Encroachment into High FRP is not supported.

3. ***PMF Impact Assessment Missing***
   While PMF simulations are referenced, the report does not include PMF impact mapping or demonstrate how flood function is maintained under PMF conditions. As per Section 5 in Chapter E13, the 20% AEP, 1% AEP and PMF flood events must be modelled to assess the flooding impact of a proposed development to property, infrastructure and the environment.

4. ***Flood Impact Maps Do Not Demonstrate Compliance***
   The flood level difference maps do not clearly show flood level changes to a resolution sufficient to assess against the permissible flood impacts in Table 2 of Chapter E13. Legends and colour scales need to be amended to make it impossible to verify compliance.

5. ***Development Within Floodway and Storage Area***
   The proposal includes works within existing floodway and flood storage areas, as mapped in Council's adopted FRMS&P. The report does not demonstrate that existing flood function is maintained. Clause 5.21 of the Wollongong LEP2009 and Chapter E13 of the Wollongong DCP2009 requires preservation of floodway and storage functions.

6. ***Flow Path Realignment Creates New Risks***
   The proposed realignment of the northern flow path to accommodate Building E concentrates flow adjacent to the northern boundary. This increases risk to adjoining land in the event of scour or erosion. The proposal does not seek to maintain the natural flood function at this location so detailed and careful analysis demonstrating how the flow function will be managed while managi8ng dynamic flow changes around the proposed building and adjoining property boundaries.

Prior discussion with the proponent has identified they may avail themselves of our prelodgement meeting process to facilitate necessary further discussions before a formal response to submissions is formulated for the Department's consideration.

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Should you require any further information please contact me direct.

Regards

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We acknowledge the Traditional Custodians of the land on which our city is built, the Aboriginal people of Dharawal Country. We recognise and appreciate their deep connection to this land, waters and the greater community.