

Our Ref: ID
Your Ref: SSD-10320

16 August 2022

Anthony Richardson
Department of Planning and Environment
Level 17, 4 Parramatta Square NSW 2150

email: Anthony.richardson@dpie.nsw.gov.au

Dear Anthony,

State Significant Development Environmental Impact Statement for President Private Hospital, Kirrawee

Thank you for the opportunity to provide comment on the State Significant Development Environmental Impact Statement (EIS) for the proposed alterations and additions to President Private Hospital, Kirrawee. It is understood that the proposed development consists of the:

- Demolition of the existing residential dwellings and timber and rendered buildings in the south-west corner of the site.
- Construction and upgrade of the existing hospital, including a multi-storey west, east and north wing, a western and northern car park and two driveway accesses.
- Construction of a four-level basement carpark.
- Development of a landscape area in the south-western corner of the site.

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.

Attention is drawn to the following principals outlined in the NSW Floodplain Development Manual, 2005 which are of importance to the NSW SES role as described above:

- **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.** The Flood Assessment provided identifies that the majority of the site is above the PMF, with a small portion exposed to high hazard (H5 in some locations) in a PMF. This is unsafe for vehicles and people, and all buildings are vulnerable to structural damage, with some less robust buildings vulnerable to failure. With short critical storm durations, between 5 and 15 minutes, evacuation is not likely to be completed successfully for this site therefore re-design of the site is recommended ensure building design is able to withstand PMF forces. In addition, as an Essential Community Facility, the proposed development should have floor levels above the

PMF. As the existing hospital is currently below the 1% AEP flood level, the proposed development has the potential to improve flood resilience at the site.

- **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.**
- **Future development must not conflict with the NSW SES's flood response and evacuation strategy for the existing community.**
- **Evacuation must not require people to drive or walk through flood water.**
- **Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation.** Although sheltering in place is proposed in the Preliminary Flood Assessment, there is possible evacuation from the site to the north outside PMF extents reducing this risk. In addition, the majority of the site itself is outside the PMF extent.

Any flood warning devices adopted must be adequately maintained, monitored and regularly tested and included in the hospital's emergency response plans.

- **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.**
- **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.**
- **NSW SES is opposed to development strategies that transfer residual risk, in terms of emergency response activities, to NSW SES and/or increase capability requirements of the NSW SES.**

Please feel free to contact Elspeth O'Shannessy 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