

Our Ref: 110934-02-Flood Evacuation Management Plan
SL:sl

8 Sep 2023

PO Box 4366
Penrith Westfield 2750
02 4720 3300
jwp@jwprince.com.au
www.jwprince.com.au



Sydney Helicopters

89-151 Old Castlereagh Road

Castlereagh NSW 2749

Attn: Mark Harrold

Subject: 89-151 Old Castlereagh Road, Castlereagh - Flood Evacuation Management Plan

Dear Mark,

J Wyndham Prince have prepared this flood evacuation management plan to support the Development Application (DA) approval for the proposed Sydney Helicopters site at 89-151 Old Castlereagh Road, Castlereagh. We note that a separate development application (DA) has been submitted for a café to be located on the same site. The proposed café is also covered by this Flood Evacuation Management Plan. This letter demonstrates the evacuation procedures and requirements of the site during a regional flood event. It is noted that the flood evacuation plan has to reviewed no less frequently than every five (5) years or after a significant flood event.

1. SITE BACKGROUND

The site is located at 89-151 Old Castlereagh Road, Castlereagh NSW 2749 and is within the Penrith City Council Local Government Area (LGA). The site elevation ranges from 24m AHD on the existing hardstand area and naturally grades to the basin that is located in the north-west portion of the site. Refer to the proposed site plan in Plate 1-1.

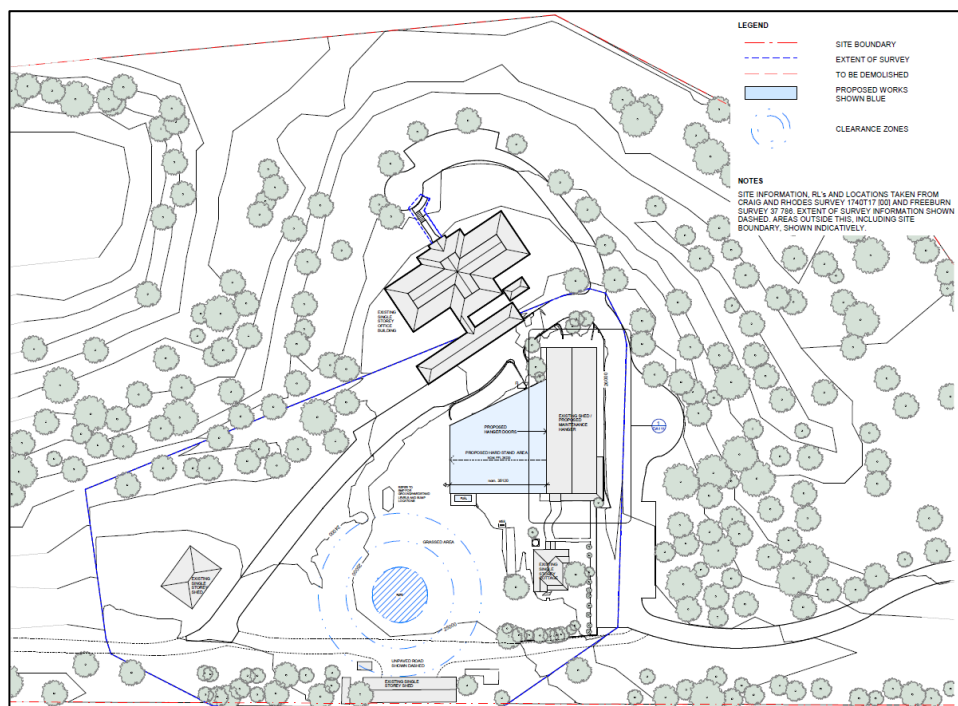


Plate 1-1 – Proposed Site Plan (Source: WMK Architecture)

The site is approximately 2.7 km east of the Nepean River and approximately 150 m south of the Sydney International Regatta Centre and zoned as Tourism South Precinct in Penrith Lakes Development Control Plan (DCP) 2022. The proposed development involves the repurposing of the existing Penrith Lakes Development Corporations offices into a Helipad Facility. This will involve the repurposing of the existing offices and sheds on the site and the introduction of additional hardstand areas at the maintenance hanger and the final approach and take off area (FATO).

The site is situated in the Hawkesbury Nepean catchment and was considered in the Nepean River Flood Study prepared by Advisian in 2017. The site is also considered in the Hawkesbury Nepean Valley Regional Flood Study prepared by WMA Water in 2019, however, flood mapping in the vicinity of Penrith Lakes is noted as being indicative only as the flood modelling does not incorporate the latest infrastructure of the Penrith Lakes Scheme.

Being part of the Hawkesbury Nepean Valley, formal evacuation of the residents within the valley is considered in the SES's evacuation strategy. The site is located within sub-sector 8.5 (Castlereagh) of the Penrith North Sector in the Hawkesbury Nepean Flood Plan (SES, 2020), which is a sub-plan of the State Emergency Management Plan (EMPLAN). Furthermore, as required by Penrith Lakes DCP 2022, flood evacuation strategy has been considered.

2. FLOOD EVACUATION ROUTES

The Hawkesbury Nepean Flood Plan (SES, 2020) identifies local and regional flood evacuation routes for the Penrith North Sector. The Penrith North Sector will need to be completely evacuated if the predicted flood level will exceed 8.2m (22.3m AHD) at the Penrith gauge which is near Victoria Bridge. The regional flood evacuation route is detailed as follows:

- Southbound along the Northern Road Evacuation Route
- Eastbound on the Great Western Highway or Eastbound on the M4 Motorway (dependant on what other sectors are also being evacuated at the same time).

The primary local flood evacuation route for the site is:

- Eastbound along Old Castlereagh Road
- Continue East along Andrews Road; and
- Southbound along the Northern Road Evacuation Route

The primary local flood evacuation route for the Sydney Helicopters site is east along Old Castlereagh Road. At the intersection of Old Castlereagh Road and Castlereagh Road, vehicles are expected to continue straight onto Andrews Road until reaching the Northern Road regional evacuation route. However, there is potential for vehicles to turn right onto Castlereagh Road and head south until reaching the Great Western Highway regional evacuation route.

The Evacuation Route for the Penrith North Sector can be seen illustrated in Map 1 and Map 9 in Annex D, of the Hawkesbury-Nepean Valley: NSW SES Evacuation Arrangements 2020. Refer to Appendix A for extracts of these maps. Figure 2-1 in Appendix B illustrates the primary and alternate flood evacuation routes for the Sydney Helicopters site.

3. FLOOD EVACUATION ASSESSMENT

Based on advice received from the SES (received on a similar development in the Hawkesbury Nepean Valley), we understand that:

- Eight (8) hours of reliable warning of flood events is available;
- It takes approximately one (1) hour for the SES to mobilise its operations for this area on receipt of a flood warning; and
- It takes the community one (1) hour to accept that evacuation is necessary and to prepare for evacuation. Note that this typically applies to residential areas. Given that Sydney Helicopters will be a managed site, it is expected that less than one (1) hour would be needed to mobilise the staff and patrons on site.

Therefore, it is conservatively assumed that six (6) hours are available for the site to evacuate.

3.1. Evacuation Time Assessment

Time Available

The target warning flood level of **RL 23.0 m AHD** is applicable for Penrith for riverine floods greater than 5% AEP and up to the 1% AEP. This level matches with the 5% AEP flood level identified in the Nepean River Flood Study (Advisian 2017) report and Hawkesbury-Nepean Valley Regional Flood Study (WMA 2019). For floods of this nature a **6 hr warning time** is relevant. (see further detail in Section 4.1 of this report)

The rate of rise for Major floods at Penrith was determined to be **0.58 m/hr** (refer Table F1 in Hawkesbury-Nepean Valley Regional Flood Study (WMA 2019))

The level at which the primary evacuation route for Site Andrews Road at Boundary Creek is overtopped is 24.7 m AHD in 1% AEP as identified Nepean River Flood Study (Advisian 2017) report and 26 m AHD in 0.1% AEP as identified in Hawkesbury-Nepean Valley Regional Flood Study (WMA 2019). To calculate the time available, Boundary Creek flooding is considered, as such, the additional time to rise to this level would be $24.7 - 23.0 = 1.7\text{m} / 0.58 \text{ m/hr} = 2.9 \text{ hr}$.

The **time available** to Evacuate is therefore 6 hr Target Warning lead time + 2.9 hours additional time for the water to rise to the point it cuts off the adopted evacuation route = **8.9 hours**

Time Required

The time required to evacuate the site has been assessed in accordance with Hawkesbury-Nepean Valley: NSW SES Divisions, Sectors, Subsectors And Evacuation Strategy Selection Considerations, Annex C 2020 and is summarised in Table 3-1.

Table 3-1 – Time Required Assessment

Parameter	Total Andrews Road Adopted Time (hrs)
Warning Time acceptance Factor (WAF) ¹	0.5
Warning Time Lag Factor (WLF) ²	1.0
Travel Time (TT) ³	0.06 (4 min)
Traffic Safety Factor (TSF) ⁴	1.0
Local Flood cutoff time (1% AEP local flood event on Boundary Creek) ⁵	2.8
Time Required (TR) = WAF+WLF+TT+TSF	5.36

¹ SES recommends 1 hr which we agree is relevant for normal residential properties. As Sydney Helicopters site is a managed site a shorter time is applicable for their evacuees.

² Patrons at Sydney Helicopters site, including staff, can mobilise within SES recommendation of 1 hr.

³ Allows for 40 cars from site. Assumes 1 lane evacuates at 600 vehicles /hr.

⁴ Adopted from SES standard table

⁵ In accordance with section 9.1.4 of Nepean River Flood Study (Advisian, 2017)

Surplus Time

The surplus time available for Sydney Helicopters site to complete an evacuation is calculated as follows:

Surplus Time = Time Available - Time Required

$$8.9 \text{ hrs} - 5.36 \text{ hrs} = 3.5 \text{ hrs}$$

3.2. Sydney Helicopters Site Assessment

Based on information provided in your email dated 21 February 2023, we understand that the total anticipated number of patrons and staff occupying the Sydney Helicopters site at any given time would be 60. This includes Sydney Helicopters staff, café staff and all visitors to the site. We also understand that there are 40 available parking spaces on the site.

Assumptions

The following assumptions have been made in the flood evacuation assessment:

- The maximum number of private vehicles on the site would be 40 based on the number of car parking spaces provided;
- On average, each car would convey 3 passengers;
- The anticipated travel mode split is 90% by car and 10% by public transport/shuttle buses together with helicopter;
- As Old Castlereagh Road and Andrews Road are single-lane roads, a maximum lane capacity of 600 vehicles/ lane/ hour is available for evacuation;
- The capacity of a 12.5 m passenger bus is 65 persons; and
- An average walking pace for a pedestrian is 5.0 km/hr and a conservatively slow walking pace is 4.5 km/hr for older individuals.

Evacuation Travel Modes

We have considered three (3) alternate travel mode scenarios in our evacuation assessment:

Scenario 1 – Private Vehicle Evacuation (100% of the patrons & staff)

Adopting an average of 3 persons per car and the 40 car parking spaces provided, there is the capacity to evacuate 120 persons by private car. Therefore, all of the anticipated 60 patrons and staff could be evacuated in this manner. At an evacuation rate of 600 vehicles/lane/hour on Old Castlereagh Road and Andrews Road, all patrons and staff of the Sydney Helicopters site could be evacuated within 5.36 hrs from the time that an evacuation notice is given as detailed in Section 3.1.2. However, the estimated time available to evacuate is 8.9 hours (refer to section 3.1.1).

Scenario 2 - Pedestrian Evacuation (if required)

In the unlikely event that vehicle access is restricted to/from the site, there is potential for all staff and patrons to walk east along Old Castlereagh Road and further east along Andrews Road to a location above the regional PMF flood level. Figure 37 of the Hawkesbury-Nepean Valley Regional Flood Study (WMA, 2019) and Map 015_B of the Nepean River Flood Study (Advisian, 2017) illustrates that Andrews Road would be flood free in a regional PMF flood event approximately 2 kms east of the site. It is a further 1 km along Andrews Road before reaching the regional Northern Road evacuation route.

Refer to Plate 2 for an extract of Map 015_B which illustrates the site in proximity to the PMF extent on Andrews Road.



Plate 2 – Proposed Flood Evacuation Route

Consequently the total capacity and Time required for Pedestrian Evacuation along Andrews Road (if required) is assessed as follows:

Distance = 2 km

Assumed Average speed 3.8 km/hr average (during evacuation event)

maximum Pedestrian Evacuees = 60

Footpath Capacity (2 persons abreast at 1.5 m spacing @ 3800 m/hr = 5,067 persons/hr

Evac Timeline Acceptance/Lag/Safety Factors (WAF + WLF + TSF) = 0.5 + 1.0 + 1.5 = 3.0 hr
(refer section 3.1 for details of each parameter)

Potential additional local flood delay = 2.5 hrs

Total Required time = 60/5,067 + 3.0 (safety) + 2.5 (flood delay) = **5.5 hr**

Total Available time = **8.9 hours** (Refer Section 3.1.1)

It is noted that during the time of flood emergency, there is also an opportunity for some patrons to evacuate via helicopter exists given the site is owned by Sydney Helicopters, however, this has been conservatively left out of evacuation calculations.

The early evacuation of commercial properties is considered beneficial in the context of the evacuation of the broader regional Hawkesbury Nepean Valley and is likely to improve the regional evacuation timeframe.

4. FLOOD EVACUATION STRATEGY

We recommend that Sydney Helicopters management undertake formal training for their staff in the evacuation strategy and the likely timeframe available for evacuation so that they can assist patrons evacuating the site without unnecessary panic.

We also recommend that Sydney Helicopters have current flood evacuation route maps prepared and printed for distribution to patrons when an evacuation is announced, particularly as traffic leaves the site. Flood evacuation plans should also be clear and visible at all entry/exit points of the site. For the successful implementation of evacuation plan, the site manager must:

- Know what to do in a flood;
- Provide the example of FloodSafe Plan to staff and construction workers;
- Maintain a register of special needs people;
- Possess emergency management skills;
- Arrange and carry out annual evacuation drills;
- Maintain the Flood Warning System;
- Engage an external auditor for annual audits; and
- Arrange for the updating and revision of the plan every 10 years.

If vehicular evacuation is restricted, preference should be given to evacuating the elderly, disabled and children from the site. Able-bodied persons have more than sufficient time within the available 8.9 hour evacuation time to walk 2 km east along Old Castlereagh Road and Andrews Road to a location above the regional PMF flood extent.

Any instruction provided at the time of an evacuation by the SES or other emergency services personnel takes precedence over this strategy. This strategy should be updated when the Hawkesbury Nepean Flood Plan (SES, 2020) is updated.

4.1. Regional Nepean River Flooding

Site Flooding

The flood depth maps provided in the Regional Flood Study (WMA, 2019) indicate that the site is flood affected in a 20% AEP (1 in 5 AEP), 1% AEP (1 in 100 AEP) and a 0.2% AEP (1 in 500 AEP) regional flood event. In the 20% AEP and 1% AEP the flooding is localised to the existing farm dam and local overland flow path in the northern portion of the site. In the 0.2% AEP, the flooding begins to breach the banks of the flow path and inundates portion of the disturbed site.

For a 0.1% AEP (1 in 1000 AEP) and up to PMF flood event the flood maps indicate that the site is completely submerged by floodwaters. This flood affectation will need to be considered during a regional flood evacuation, as evacuees will need to drive up Andrews Road and out of the PMF flood zone. Refer to the figures from the Regional Flood Study (WMA, 2019) which are included in Appendix C for range of storm event.

Andrews Road Flooding

In events up to and including the 0.2% AEP, the local evacuation route (Old Castlereagh Road and Andrews Road) remain flood free. In the 0.1% AEP and greater events, Andrews Road becomes inundated between Castlereagh Road and Laycock Street. This flood affectation will need to be considered during a regional flood evacuation, as evacuees will need to drive up Andrews Road and out of the PMF flood zone.

This flood affectation will need to be considered during a regional flood evacuation, as evacuees will need to drive up Andrews Road and out of the PMF flood zone. Refer to Plate 4-1 below which depicts Andrews Road flooding.

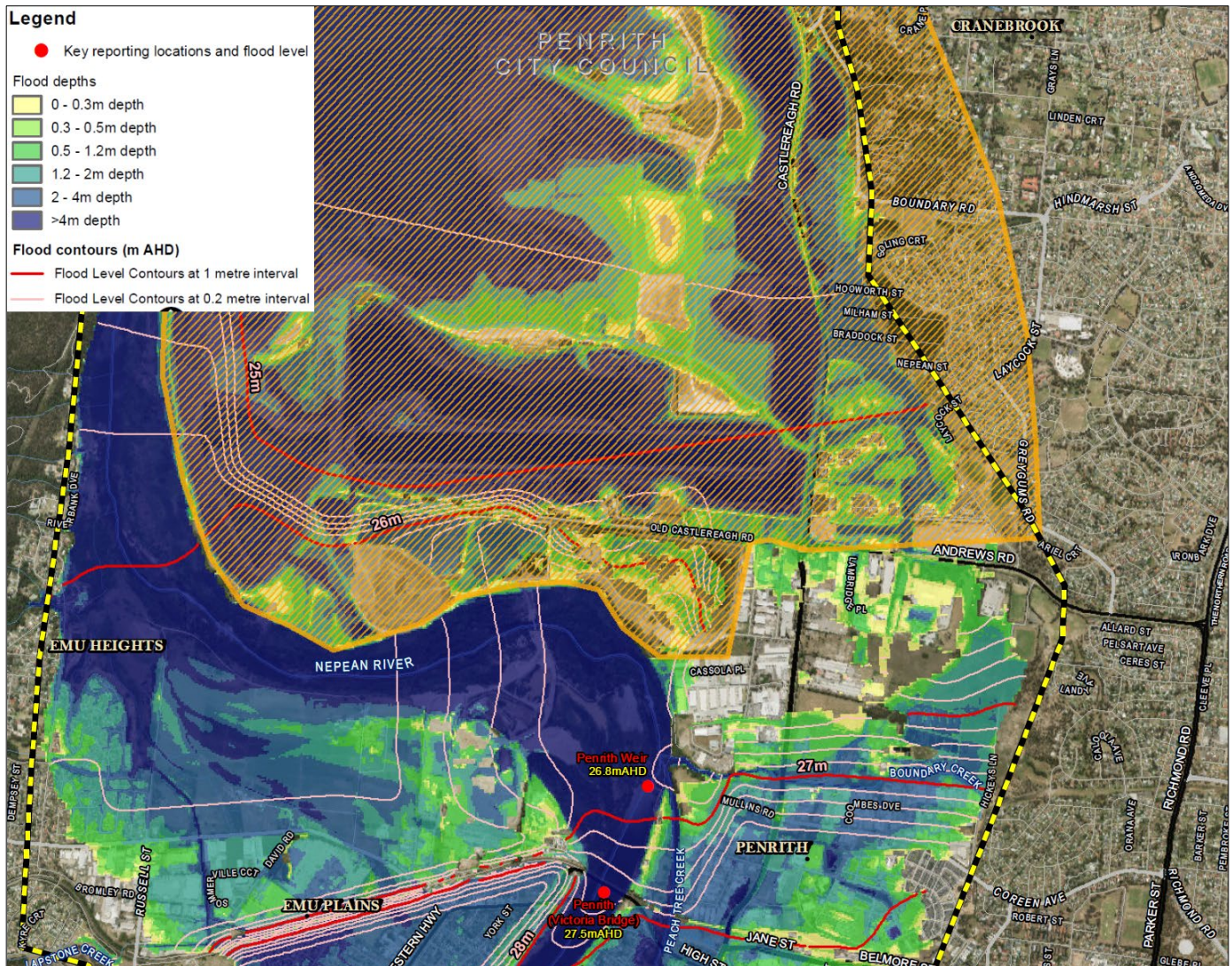


Plate 4-1 - Andrews Road Corridor showing peak 0.1% AEP Depth (Source: Hawkesbury-Nepean Valley Regional Flood Study 2019)

The document titled *HAWKESBURY-NEPEAN VALLEY: NSW SES FLOOD WARNING GAUGES – Annex B, Supporting document (NSW SES Response Arrangements for Hawkesbury-Nepean Valley) to the Hawkesbury-Nepean Flood Plan 2020* advises on the locations of flood warnings and local flood advice that are issued. An extract from table 1 of this document is provided in Table 4-1.

The Penrith Gauge at the Victoria Bridge has a base level of RL 14.1 m AHD. This means the target warning flood level of **RL 23 m AHD** is applicable for Penrith. This matches with the 20yr flood level identified in the Nepean River Flood Study (Advisian 2017) report and Hawkesbury-Nepean Valley Regional Flood Study (WMA, 2019). For floods of this nature a **6 hr warning time** is relevant.

As mentioned in Section 2 of this letter, the Penrith North sector (which includes the Sydney Helicopters site) will need to be completely evacuated if the predicted flood level at the Penrith gauge will exceed RL 22.3 m. This means that the site will be evacuated well before a Andrews Road flooding would occur.

It is noted that the regional flood mapping presented in the study at Penrith Lakes is indicative only.

Refer to the figures range of storm events, 20% AEP, 10% AEP, 5% AEP, 2% AEP, 1% AEP, 0.5% AEP, 0.2% AEP, 0.1% AEP, 0.05% AEP, 0.02% AEP and PMF the from Regional Flood Study (WMA, 2019) which are included in Appendix C.

Table 4-1 – Gauge Monitred within the Hawkesbury-Nepean Valley

Table 1: Gauges monitored within the Hawkesbury-Nepean Valley

Bureau No.	AWRC No.	Forecast location	Station owner	Gauge type	Flood Classification (m)			Flood Warnings provided by the Bureau	Flood Intelligence Card Held	Gauge Zero (m)	Target warning lead time		70% of peak forecasts within	Comments
					Min	Mod	Maj				Time (hrs)	Trigger height (m)		
568171	212238	Menangle Weir +	Water NSW	Automatic	2.8	6.5	9.3	No (flood classifications available for information only)						Used as a proxy to predict to 212238.
068216	212904	Menangle	Bureau	Automatic	5.2	9.2	12.2	Quantitative	Yes	58.47	6hrs	>5.2m	+/- 0.3m	
568154	212216	Camden Weir +	Water NSW	Automatic	6.8	8.3	13.8	Quantitative		55.284	12hrs	>6.8m	+/- 0.3m	Used as a proxy to predict to 212900
68214	212900	Camden Bridge	Bureau	Manual	6.8	8.3	13.8	No (flood classifications available for information only)	Yes	55.672				212216 is used to predict to this gauge. They read roughly the same.
067093	212202	Wallacia Weir	Water NSW	Automatic	5.0	8.7	11.0	Quantitative	Yes	29.646	12hrs	>5.0m	+ / - 0.3m	
567047	212201	Penrith	Water NSW	Automatic	3.9	7.9	10.4	Quantitative	Yes	14.136	6hrs	>8.9m	+/- 0.3m	
											8hrs	>11.3m		

4.2. Local Nepean River Flooding

Site Flooding

The flood depth maps provided in the Nepean River Flood Study (Advisian, 2017) indicate that the site is not flood-affected in a 20 year ARI (5% AEP). In the 50 year ARI (2% AEP), 100 year ARI (1% AEP) and 200 year ARI (0.5% AEP) the site is flood affected, however, the flooding is localised to the existing farm dam and local overland flow path in the northern portion of the site. In the 500 year ARI (0.2% AEP), the flooding begins to breach the banks of the flow path and inundates portion of the disturbed site.

For a 1000 year ARI (0.1% AEP), 2000 year ARI (0.05% AEP) and a PMF flood event the flood maps indicate that the site is completely submerged by floodwaters.

Refer to the figures from the Nepean River Flood Study (Advisian, 2017) which are included in Appendix D.

Andrews Road Flooding

In events up to and including the 50 year ARI (2% AEP), the local evacuation route (Old Castlereagh Road and Andrews Road) remain flood free. In the 100 year ARI (1% AEP) and greater events, Andrews Road becomes inundated between Castlereagh Road and Laycock Street. This flood affectation will need to be considered during a regional flood evacuation, as evacuees will need to drive up Andrews Road and out of the PMF flood zone.

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Section 9.1.4 of the Nepean River Flood Study (Advisian, 2017) provides further details into the flood behaviours in the “Andrews Road Corridor” which is flooded by backwaters that emanate from Boundary Creek in the south and drain north across Andrews Road and through the Lakeside development. Refer to Plate 4-2 below which depicts this flow path.

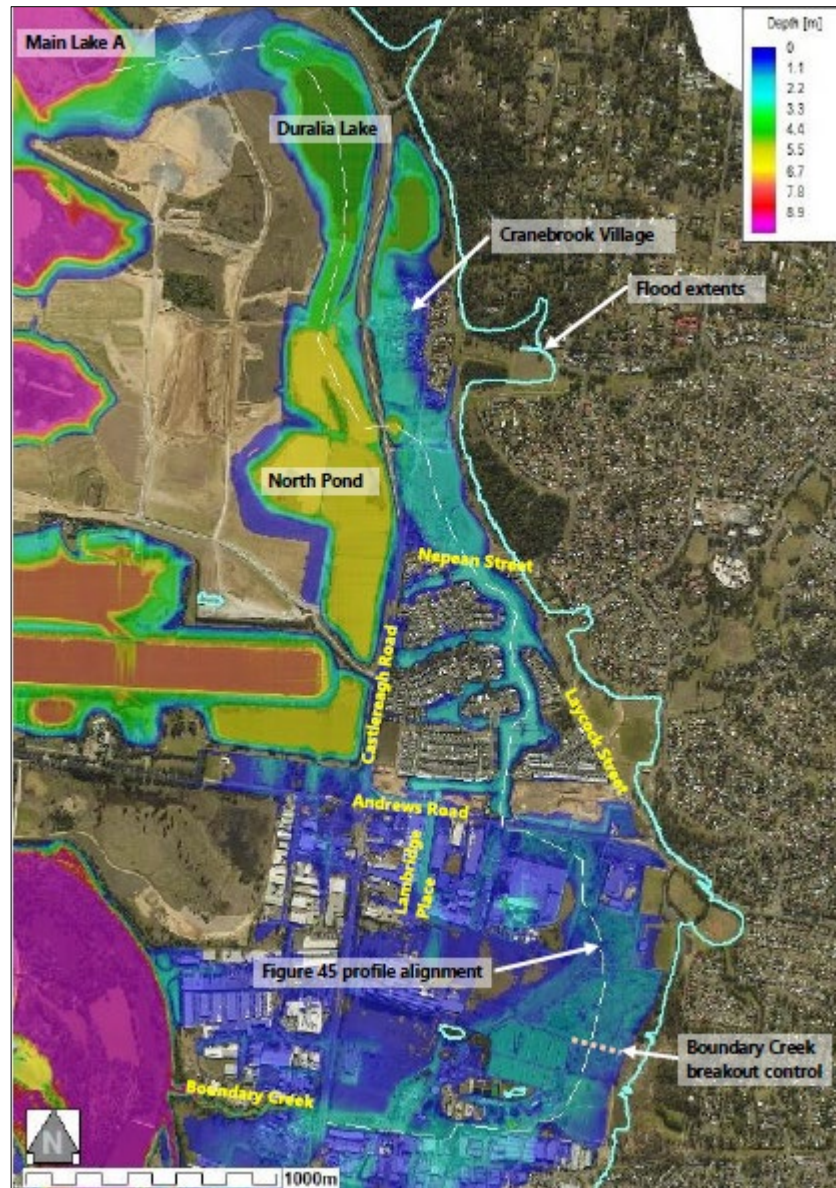


Plate 4-2 - Andrews Road flow corridor showing peak 200yr ARI depth and PMF extents (Source: Nepean River Flood Study, Figure 47)

During the PMF event, which is noted in the flood study as having the fastest rate of rise, the Boundary Creek breakout control (refer to Plate 3) is breached at a level of RL 24.7m. From this moment, it takes 2.8 hours for flood waters to increase to a level of RL 25.01m at the breakout control, at which point flows have expanded across the flow path and overtopped Andrews Road. Refer to section 9.1.4 of the Nepean River Flood Study (Advisian, 2017) for more information.

The Boundary Creek breakout occurs at a Penrith gauge level of RL 25.5m (near Victoria Bridge). As mentioned in Section 2 of this letter, the Penrith North sector (which includes the Sydney Helicopters site) will need to be completely evacuated if the predicted flood level at the Penrith gauge will exceed RL 22.3m. This means that the site will be evacuated well before a Boundary Creek breakout (and subsequent Andrews Road flooding) would occur.

4.3. Early Evacuation and Impact on Regional Flood Evacuation

As commercial properties within the Hawkesbury Nepean Valley are managed sites, these sites have the potential to be evacuated early on the direction of the site manager. That is, the SES's assumed one (1) hour time for residential residents to accept that they need to evacuate is not likely to be required for the commercial sites.

Therefore, the evacuation of commercial sites would occur ahead of the residential population. Given the proximity (approximately 3 km) of the site evacuees to the regional Northern Road evacuation route, the commercial evacuees would be on the Northern Road, well before the residential properties in the Penrith North Sector start to mobilise.

The likelihood of all commercial properties in the area (including Sydney Helicopters) being at full capacity also needs to be considered. A severe weather event sufficient to trigger a regional evacuation would likely be apparent to a significant portion of the population in the preceding days via the issue of a 'Flood Watch' for the Hawkesbury Nepean River from the Bureau of Meteorology (BoM). It is therefore likely that many patrons of commercial premises, and particularly the Sydney Helicopters site, would choose to make alternate arrangements and would not be within the floodplain.

The early evacuation of commercial properties is considered beneficial in the context of the evacuation of the broader regional Hawkesbury Nepean Valley and is likely to improve the regional evacuation timeframe.

4.4. Flood Awareness

Staffs, construction workers and visitors to the site need to be made aware of the flood hazard and evacuation procedures through a combination of measures and must be aware of FloodSafe Plan. All staff should be prepared and know what each staff member has to do if flooding should occur and know what route you are going to use to evacuate, as such a regular flood evacuation drill is recommended to reduce human behaviour risk during the flood events.

Signage should be installed at key locations within the site with clearly labelled directions of travel in the event of a flooding emergency. The signage draws awareness to flooding on site and flood evacuation procedures. The signs to guide people along the regional flood evacuation routes towards safer areas have to be installed. The template from SES is provided in Appendix E.

Individual staff including construction workers must be aware of FloodSafe Plan. The FloodSafe tips and "Get Prepared for Flood" fact sheet need to be provided on the notice board of office buildings and café. A Hawkesbury-Nepean factsheet "Get Prepared for Flood" and FloodSafe tips from the SES can be found in Appendix F.

4.5. Flood Warning

The Australian Warning System (AWS) is a nationally consistent, three-tiered approach designed to make warnings clearer and lead people to take action ahead of severe weather events. The warning system comprises warning levels, action statements, hazard icons, colours and shapes and can be found in [Our Warnings | NSW State Emergency Service](#).

There are three levels within the AWS - Advice, Watch & Act and Emergency Warning as shown in Plate 4-3. For each level, there are a series of clear action statements to guide positive action by the community.

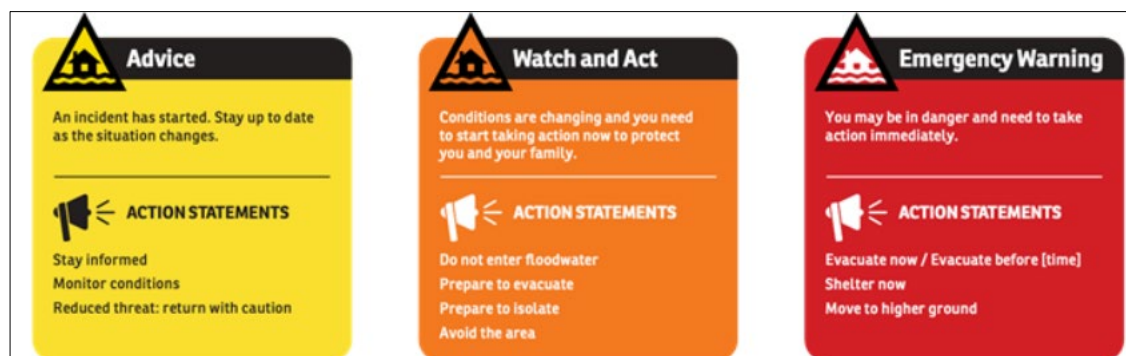


Plate 4-3 - Australian Warning System

These include 'stay informed', 'prepare to evacuate' and 'move to higher ground' as shown below:

- Advice - an incident has started. Stay up to date in case the situation changes.
 - Stay informed
 - Monitor conditions
 - Reduced threat: return with caution
- Watch and Act - conditions are changing and you need to start taking action now to protect you and your family.
 - Do not enter floodwater
 - Prepare to evacuate
 - Prepare to isolate
 - Avoid the area
- Emergency Warning - the highest level of warning. You may be in danger and need to take action immediately.
 - Evacuate now / Evacuate before [time]
 - Shelter now
 - Move to higher ground

Observation of local rainfall or floodwater

An important indication of likely imminent flood activity would be intense local rainfall. Furthermore, monitor WaterNSW site ([Warragamba Dam - WaterNSW](#)) for updates on spills from Warragamba Dam, affecting Nepean River water levels.

The Bureau of Meteorology

The Bureau of Meteorology does not prepare flood predictions for the Parramatta River but does issue Severe Thunderstorm Warnings and Severe Weather Warnings for Sydney.

Severe Thunderstorm Warnings are issued together with maps indicating the current location and predicted path of thunderstorms. Severe Weather Warnings are for severe weather not related to thunderstorms, cyclones or fire, but for other causes of intense rainfall or storm surge, such as "east coast lows". These warnings are available at <http://www.bom.gov.au/nsw/warnings/>.

BoM also provides real-time rain radar coverage for Sydney at <http://www.bom.gov.au/products/IDR713.loop.shtml>.

The NSW SES (Emergency Phone Number 132 500)

The local SES unit is Penrith located at 27 Fowler Street, Claremont Meadows NSW. The applicable region is the Metro Zone, which operates a Facebook page for informing members of the public (<https://m.facebook.com/PenrithSES>).

The SES issues Local Flood Advices. These are issued on the basis of localised valley watch information for locations for which the BoM does not issue Flood Warnings. They normally predict which class of flooding (minor, moderate or major) will occur, and must not contradict any Flood Warnings provided by the BoM for other gauges on the same river. Local Flood Advices are to be identified as being issued by the SES ([Home | NSW State Emergency Service](#)).

Local television and radio stations

Local television and radio stations would disseminate warnings from the Bureau of Meteorology, SES and other relevant sources. The local radio station for emergency information is 702 ABC.

5. POST-FLOOD RECOVERY PLAN

During a regional Nepean River flood event such as the PMF storm event, it is anticipated that the regional utility services such as electricity, sewer, water and communications would be out of commission for a period of time. Without the availability of these key utilities, it is unlikely that the Sydney Helicopters development would be able to conduct normal operations immediately following an extreme flood.

Once the SES has given the 'all clear' for residents and business owners to return to their premises after a flood, we anticipate that the post-flood recovery operations would include the following actions by the site manager:

- Arrange for a suitably qualified professional to undertake an inspection of the site for any structural damage to determine whether the building is safe to occupy;
- Liaise with utility providers to confirm the anticipated timeframes in which they can be restored;
- Clean up any debris and repair any damage to the building to ensure it is safe to occupy

Once all essential services are re-established and the site is cleaned/repared after a flood event, normal operations could resume.

6. CONSULTATION

Urbis Pty Ltd has prepared the Response to Submissions (RTS) report for Sydney Helicopters in February 2022 in response to the community and agency submissions received during the public exhibition of the Environmental Impact Statement (EIS) for a proposed Helipad facility. The following government agencies had made submissions relevant response to each submission has been provided on the 2022 RTS report.

- Blue Mountains City Council;
- Civil Aviation Safety Authority;
- Department of Infrastructure, Transport, Regional Development & Communications;
- Julia Finn MP – Member for Granville;
- NSW DPE - Environment, Energy and Science Group;
- NSW Rural Fire Service;
- Penrith City Council; and
- Transport for NSW.

Refer to the 2022 RTS report for detailed information.

It is noted that the Department of Planning and Environment (DPE) required evidence of consultation with the Hawkesbury-Nepean Valley Flood Risk Management Directorate within Infrastructure NSW, NSW State Emergency Service (SES) and Transport for NSW as a part of this plan and is discussed below:

- NSW State Emergency Service (SES)
J. Wyndham Prince has reviewed the comments received on 30 June 2023 from SES and have updated the strategy accordingly. The SES comments is provided in Appendix G.
- Transport for NSW (TfNSW)
Transport for NSW (TfNSW), stated in 2022 RTS report that *The proposed flood evacuation procedures appear to incorrectly identify primary evacuation routes via the Great Western Highway which, in particular, includes egress from the site via a low-lying railway underpass at Penrith. The proposal should revisit flood evacuation procedures and include consultation with NSW State Emergency Services on the preferred regional evacuation path.*
The updated FEMP addressing all the comments from SES dated 30 June 2023 was provided to TfNSW for their review and comments on 11 August 2023. TfNSW responded on 1 September 2023 noting that this report has addressed the TfNSW requirements and that Penrith Council and the SES have been consulted on the updated

Flood Evacuation Management Plan as such TfNSW have no further comments. The response from TfNSW is provided in Appendix H.

- Hawkesbury-Nepean Valley Flood Risk Management Directorate (New South Wales Reconstruction Authority from 1 July 2023) within Infrastructure NSW

J. Wyndham Prince consulted with Hawkesbury-Nepean Valley Flood Risk Management Directorate, now, New South Wales Reconstruction Authority (NSWRA) as required by DA condition on 11 August 2023. J. Wyndham Prince received the response from NSWRA on 22 August 2023. In terms of evacuation risk, NSWRA stated that the evacuation risk to life is relatively low from this development is low given that the development site would need evacuation for events greater than 1 in 20 chance per year (5% AEP event).

The NSWRA notes that:

- The SES is the combat agency for flood events, and is responsible for managing flood events including flood emergency evacuations.
- The NSWRA supports the issues they raised in SES letter on the FEMP to the Department of Planning and Environment dated 30 June 2023.
- Also during flood emergencies the directions from the SES and other emergency response agencies must prevail over the measures outlined in the FEMP.

The response from NSWRA is provided in Appendix I.

We trust that this report complies with the DA condition requirement to have confidence that the patrons and staff of the Sydney Helicopters will have a manageable and safe flood evacuation strategy.

Should you have any queries regarding this matter please do not hesitate to contact me.

Yours faithfully



SABINA LOHANI

Manager – Stormwater & Flooding

7. REFERENCES

- State Emergency Service (SES), Hawkesbury Nepean Flood Plan, NSW Government, September 2020.
- WMA Water (WMA), Hawkesbury Nepean Valley Regional Flood Study Final Report, Infrastructure NSW, July 2019.
- Advisian, Nepean River Flood Study, Penrith City Council, August 2017.
- NSW Department of Planning and Environment (DPE), Penrith Lakes Development Control Plan, June 2022

8. APPENDICES

Appendix A – Maps extracted from the Hawkesbury Nepean Flood Plan (SES, 2020)

Appendix B – Sydney Helicopters Flood Evacuation Plan

Appendix C – Maps extracted from the Hawkesbury Nepean Valley Regional Flood Study (WMA, 2019)

Appendix D – Maps extracted from the Nepean River Flood Study (Advisian, 2017)

Appendix E – Signs to Guide Flood Evacuation Routes

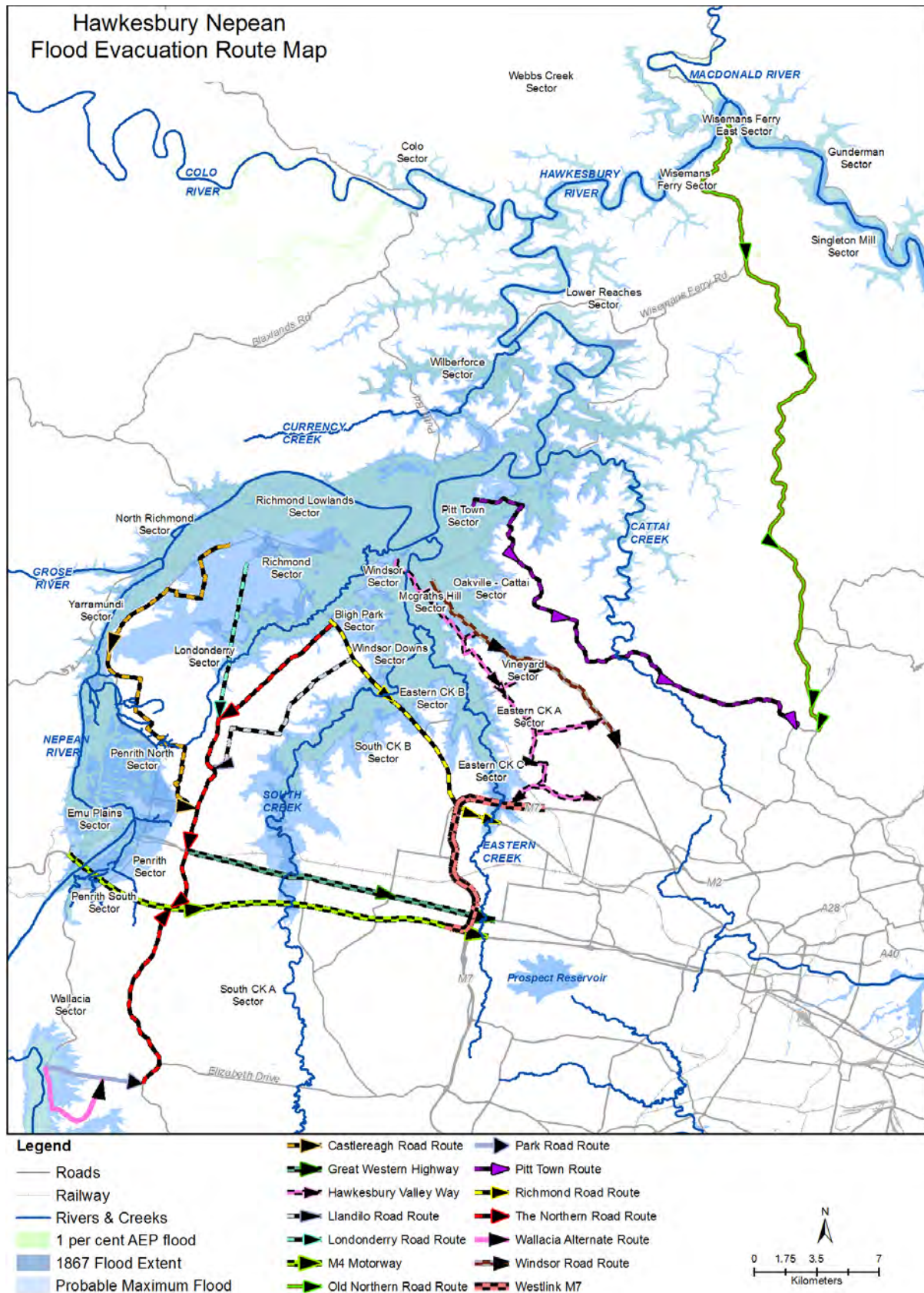
Appendix F – Hawkes-Nepean Fact Sheet “Get Prepared for Flood”

Appendix G – SES Consultation

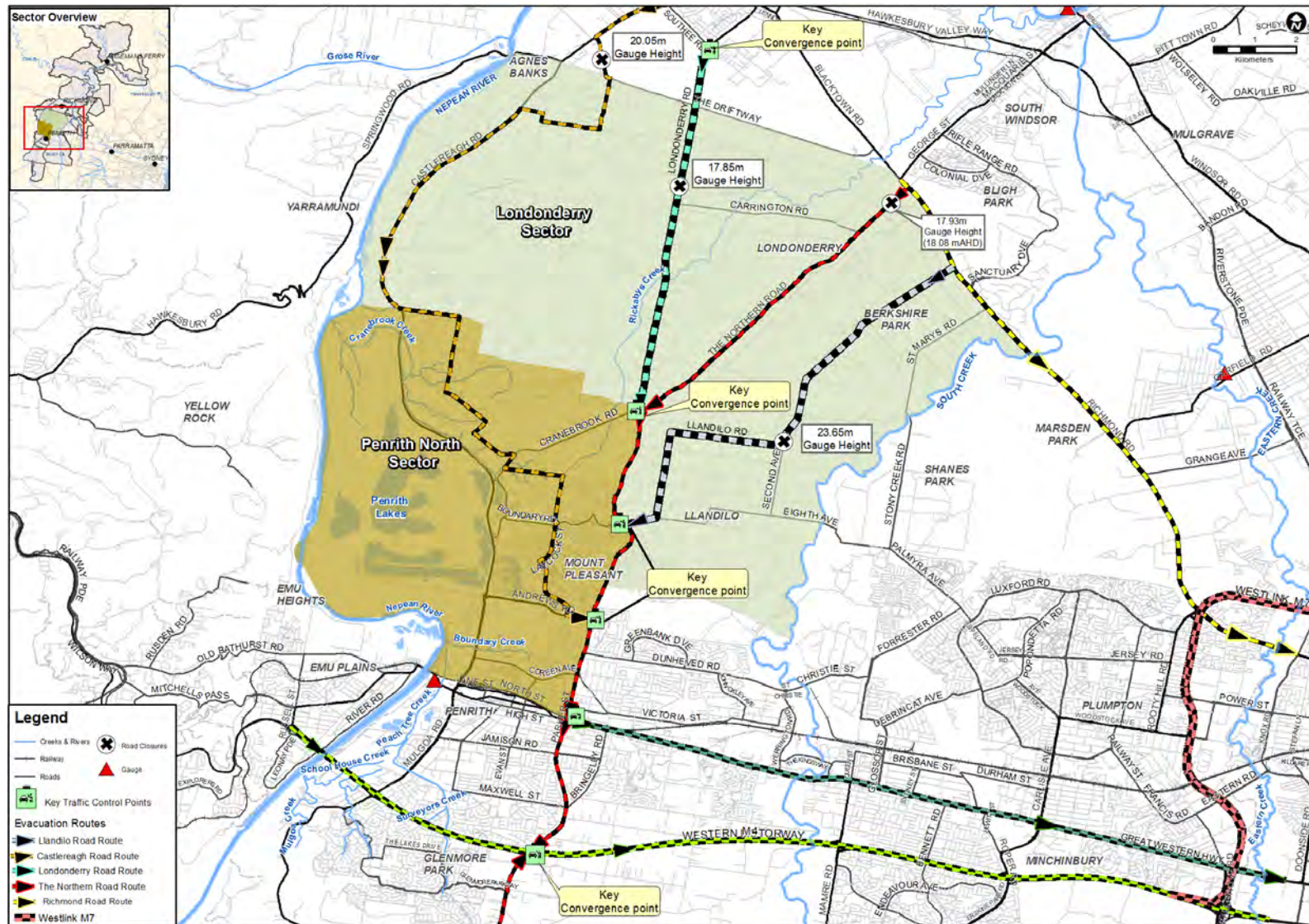
Appendix H – TfNSW Consultation

Appendix I – NSWRA Consultation

APPENDIX A – MAPS EXTRACTED FROM THE HAWKESBURY NEPEAN FLOOD PLAN (SES, 2020)



Map 1: Regional Evacuation Routes within the Hawkesbury-Nepean Valley



Map 9: Londonderry and Penrith North - Evacuation Routes

APPENDIX B – SYDNEY HELICOPTERS FLOOD EVACUATION PLAN



LEGEND

- Primary Flood Evacuation Route
- Alternate Flood Evacuation Route
- Existing Contours
- Site Area



0 200 400 m

Scale 1: 14299 @ A3

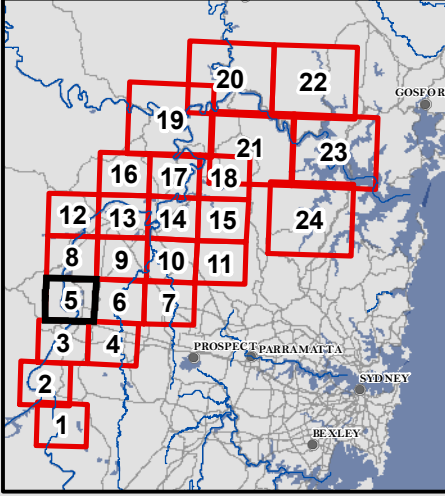
Projection: GDA2020 / MGA zone 56

Figure 2-1
89-151 Old Castlereagh Road, Castlereagh

Flood Evacuation Routes

APPENDIX C – MAPS EXTRACTED FROM THE HAWKESBURY NEPEAN VALLEY REGIONAL FLOOD STUDY (WMA, 2019)

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part A
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 5 AEP flood
(20% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

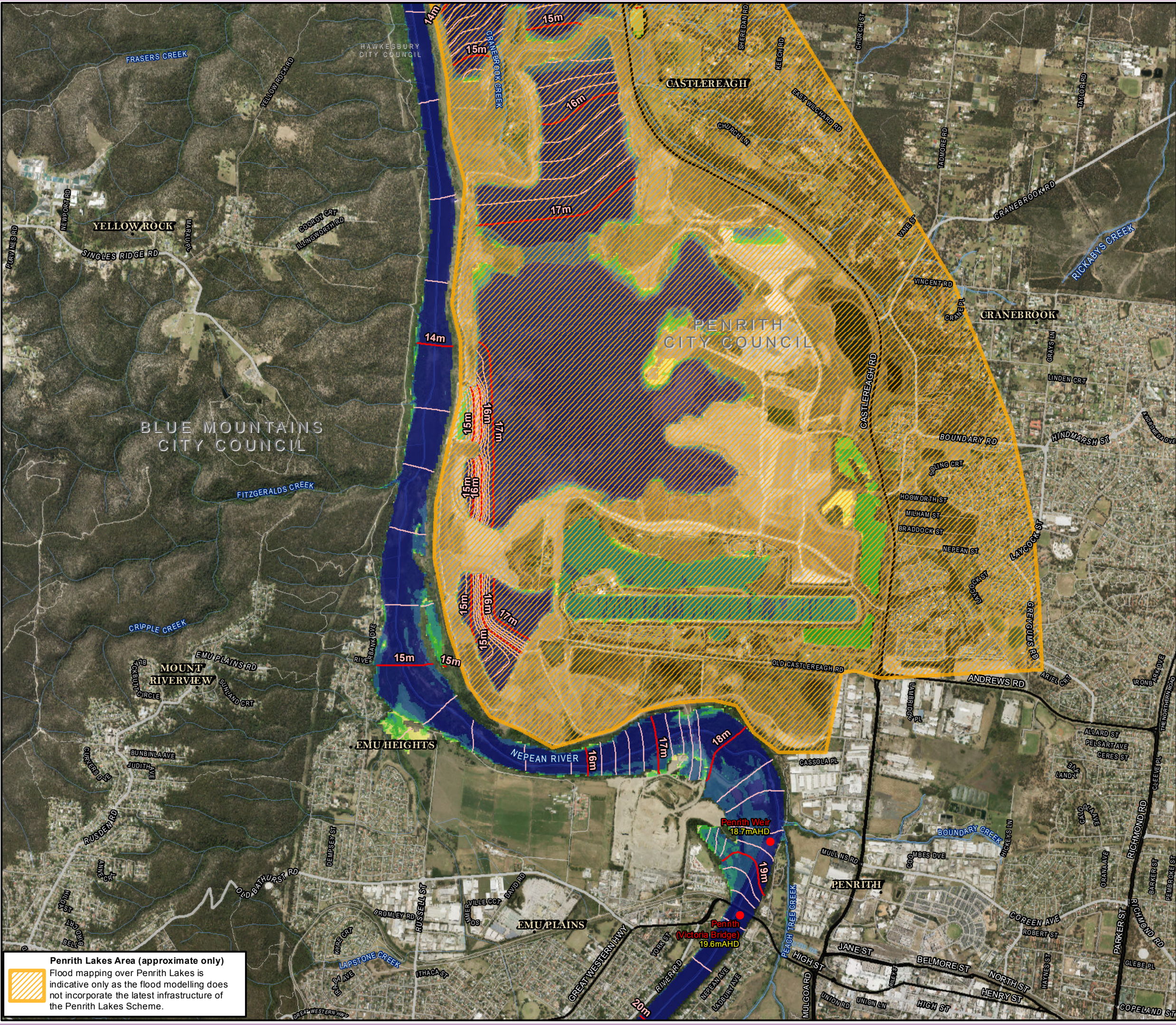
Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500

Metres (1:28,000 at A3)

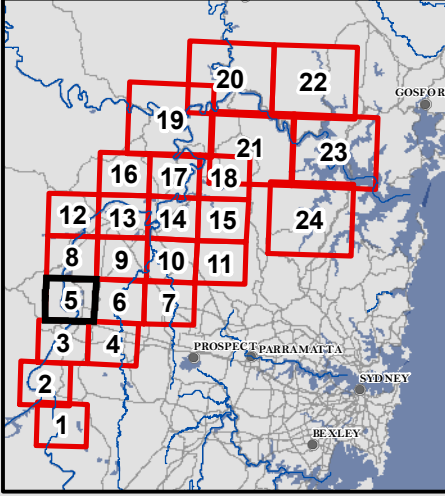
Notes:
This map was prepared by Infrastructure NSW based on the Hawkesbury-Nepean Valley Regional Flood Study (WMAwater, Final Report July 2019) using LiDAR dated May 2017 (dated 2011 downstream of Wisemans Ferry). The mapped flood information represents Hawkesbury-Nepean mainstream regional flooding including backwater effects, but does not include local catchment flooding or local overland flooding.
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Flood depths are indicative only. To determine the depth of flooding at a particular location, the flood level should be compared to a surveyed ground level.
Aerial photography: 2016 NSW Spatial Services



Penrith Lakes Area (approximate only)

Flood mapping over Penrith Lakes is indicative only as the flood modelling does not incorporate the latest infrastructure of the Penrith Lakes Scheme.

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part A
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 10 AEP flood
(10% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

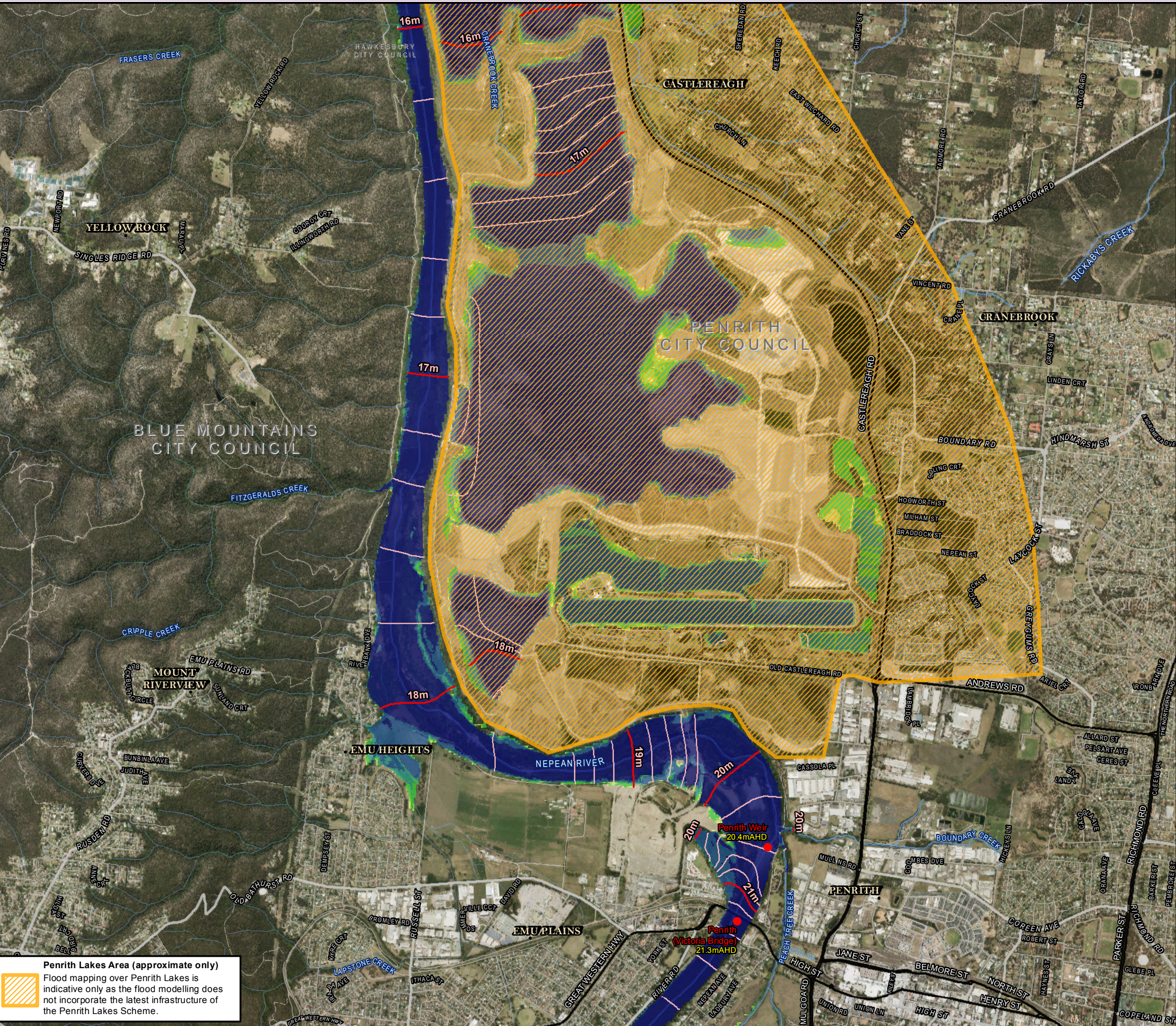
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500
Metres (1:28,000 at A3)

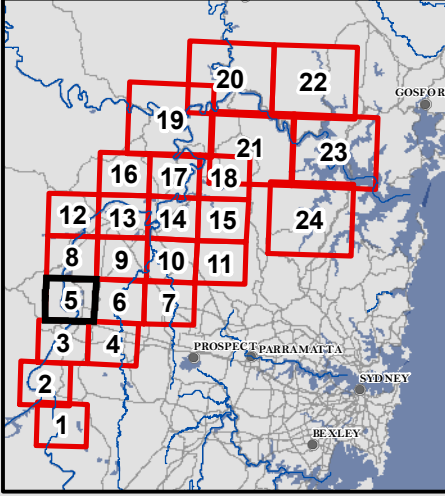
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Aerial photography: 2016 NSW Spatial Services



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Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part A
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 20 AEP flood
(5% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

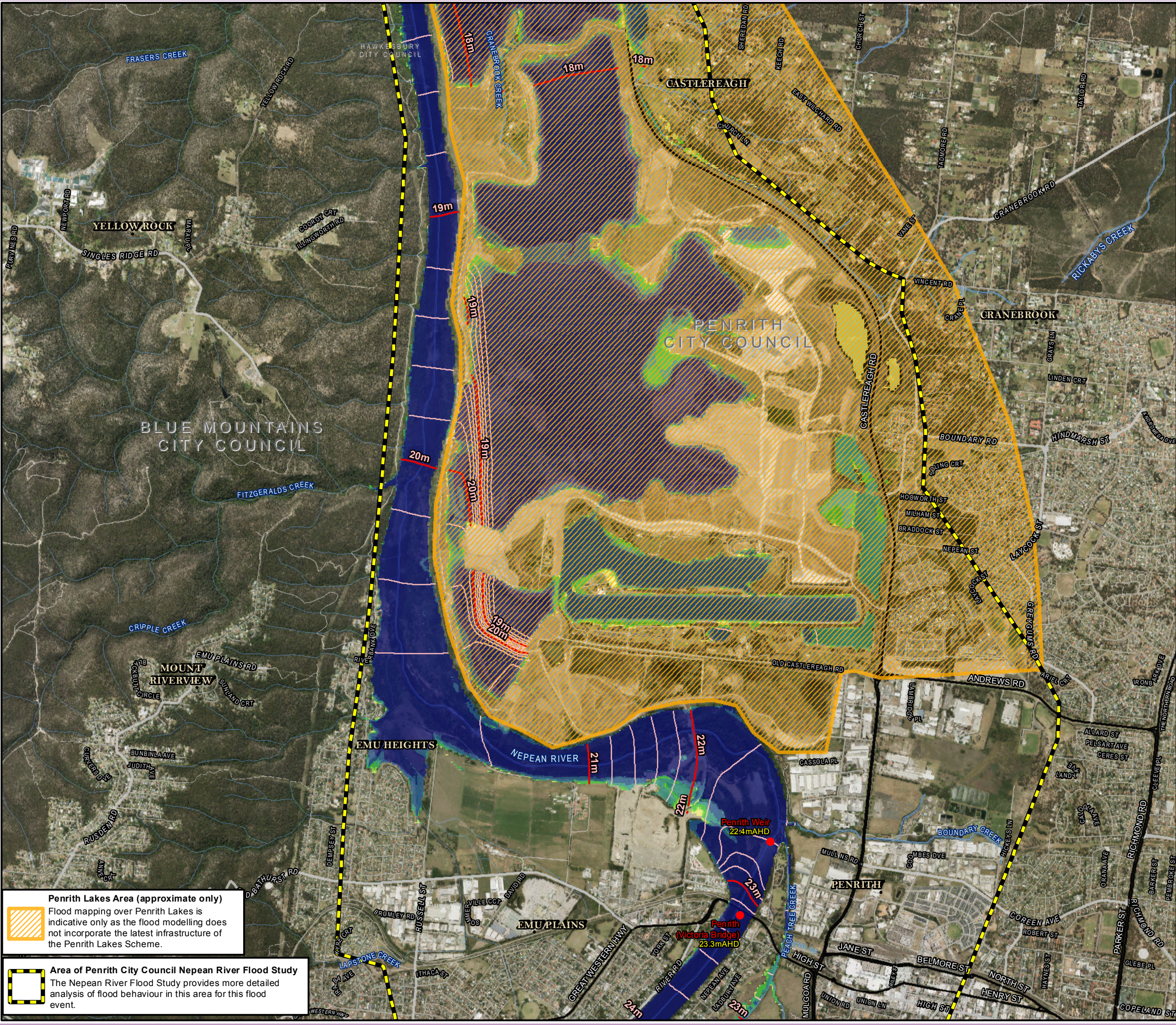
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500
Metres (1:28,000 at A3)

Notes:
This map was prepared by Infrastructure NSW based on the Hawkesbury-Nepean Valley Regional Flood Study (WMAwater, Final Report July 2019) using LiDAR dated May 2017 (dated 2011 downstream of Wisemans Ferry). The mapped flood information represents Hawkesbury-Nepean mainstream regional flooding including backwater effects, but does not include local catchment flooding or local overland flooding.
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Aerial photography: 2016 NSW Spatial Services



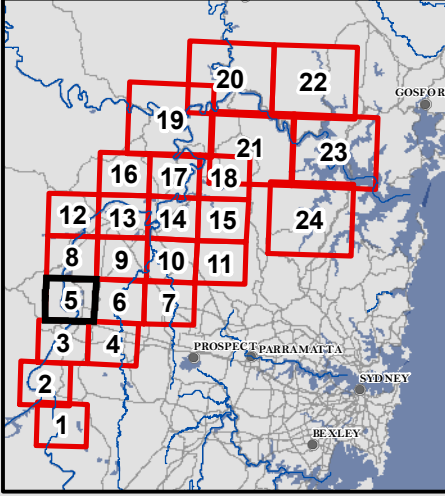
Penrith Lakes Area (approximate only)

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Area of Penrith City Council Nepean River Flood Study

The Nepean River Flood Study provides more detailed analysis of flood behaviour in this area for this flood event.

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part A
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 50 AEP flood
(2% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

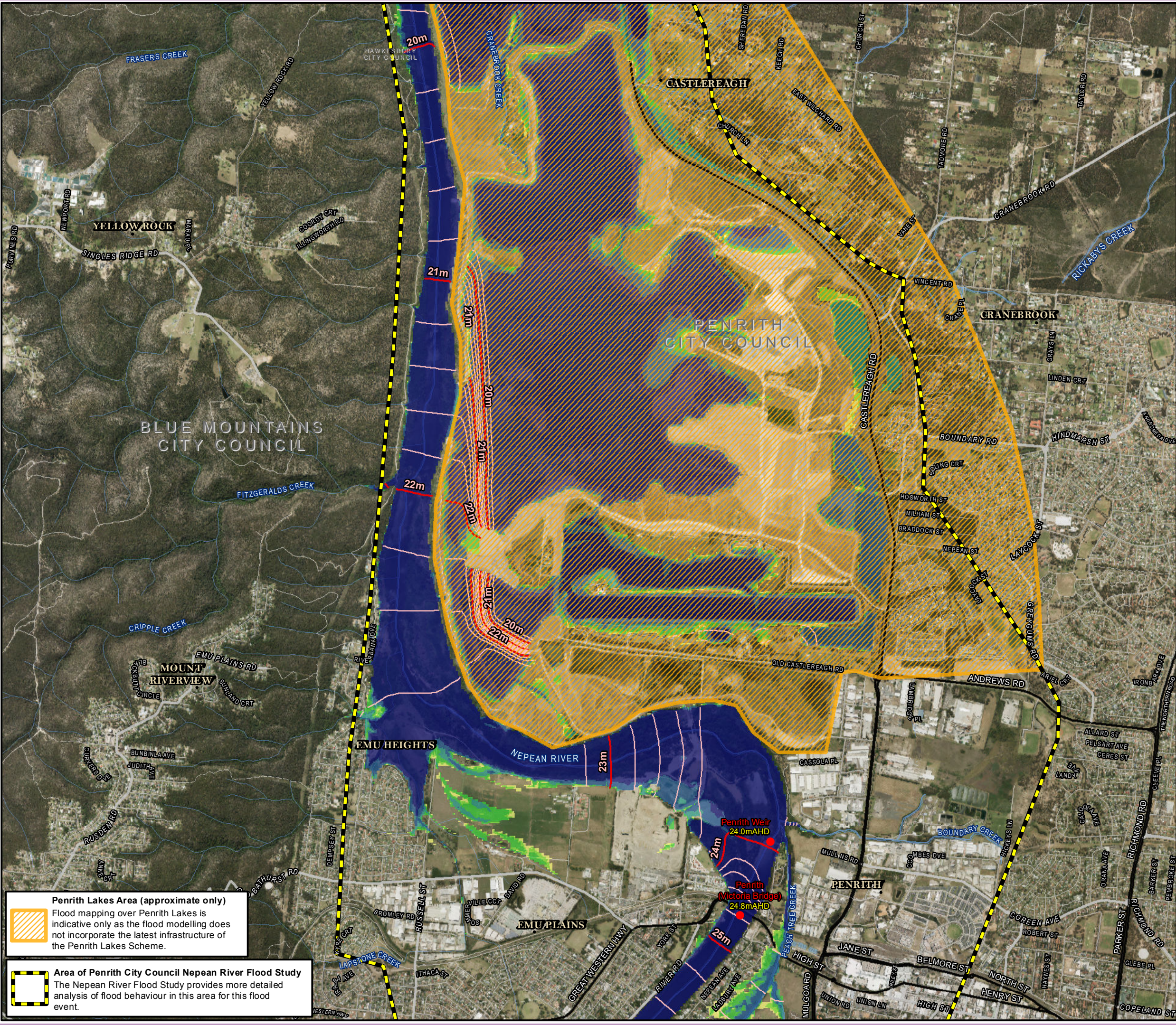
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500
Metres (1:28,000 at A3)

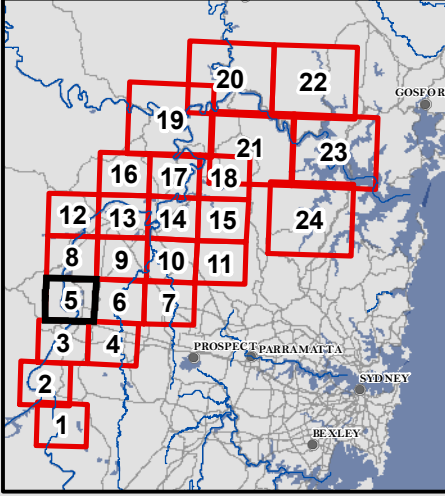
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Aerial photography: 2016 NSW Spatial Services



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Area of Penrith City Council Nepean River Flood Study
The Nepean River Flood Study provides more detailed analysis of flood behaviour in this area for this flood event.

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part A
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 100 AEP flood
(1% chance per year flood)



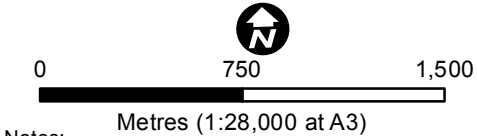
Legend

● Key reporting locations and flood level

- Flood depths**
- 0 - 0.3m depth
 - 0.3 - 0.5m depth
 - 0.5 - 1.2m depth
 - 1.2 - 2m depth
 - 2 - 4m depth
 - >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval



Notes:

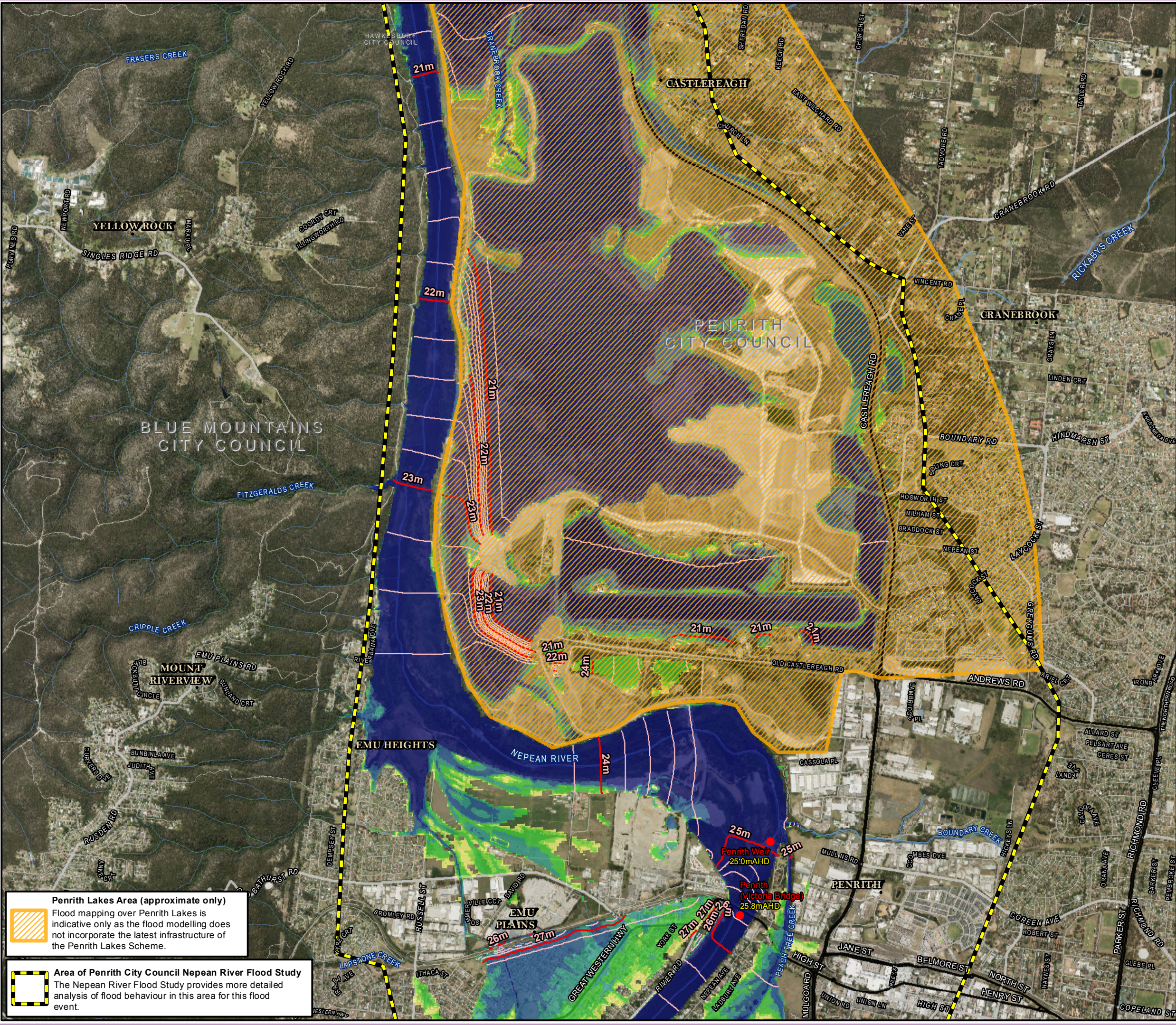
This map was prepared by Infrastructure NSW based on the Hawkesbury-Nepean Valley Regional Flood Study (WMAwater, Final Report July 2019) using LiDAR dated May 2017 (dated 2011 downstream of Wisemans Ferry). The mapped flood information represents Hawkesbury-Nepean mainstream regional flooding including backwater effects, but does not include local catchment flooding or local overland flooding.

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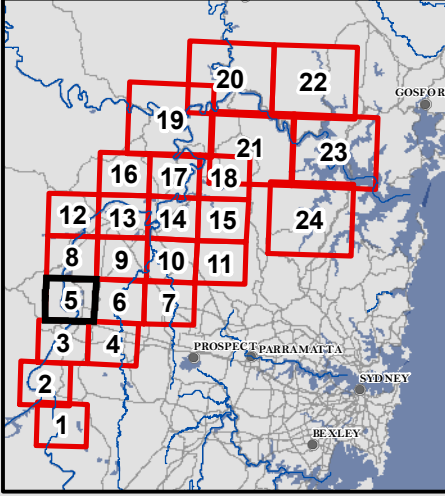
Aerial photography: 2016 NSW Spatial Services



Penrith Lakes Area (approximate only)
Flood mapping over Penrith Lakes is indicative only as the flood modelling does not incorporate the latest infrastructure of the Penrith Lakes Scheme.

Area of Penrith City Council Nepean River Flood Study
The Nepean River Flood Study provides more detailed analysis of flood behaviour in this area for this flood event.

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part A
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 200 AEP flood
(0.5% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

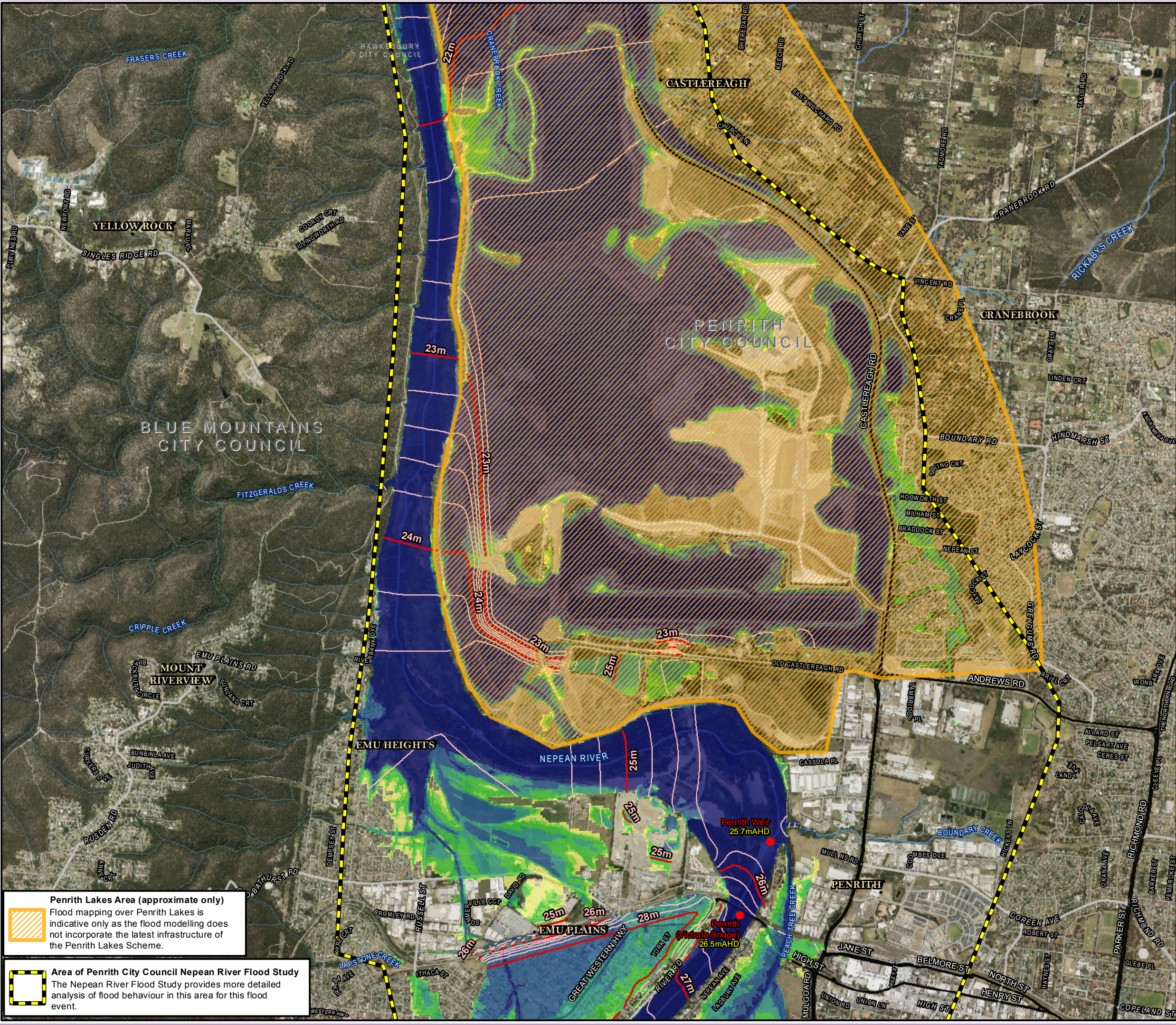
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500
Metres (1:28,000 at A3)

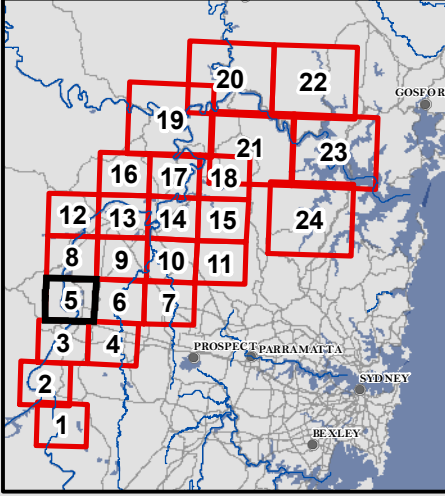
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Aerial photography: 2016 NSW Spatial Services



Penrith Lakes Area (approximate only)
Flood mapping over Penrith Lakes is indicative only as the flood modelling does not incorporate the latest infrastructure of the Penrith Lakes Scheme.

Area of Penrith City Council Nepean River Flood Study
The Nepean River Flood Study provides more detailed analysis of flood behaviour in this area for this flood event.

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part B
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 500 AEP flood
(0.2% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

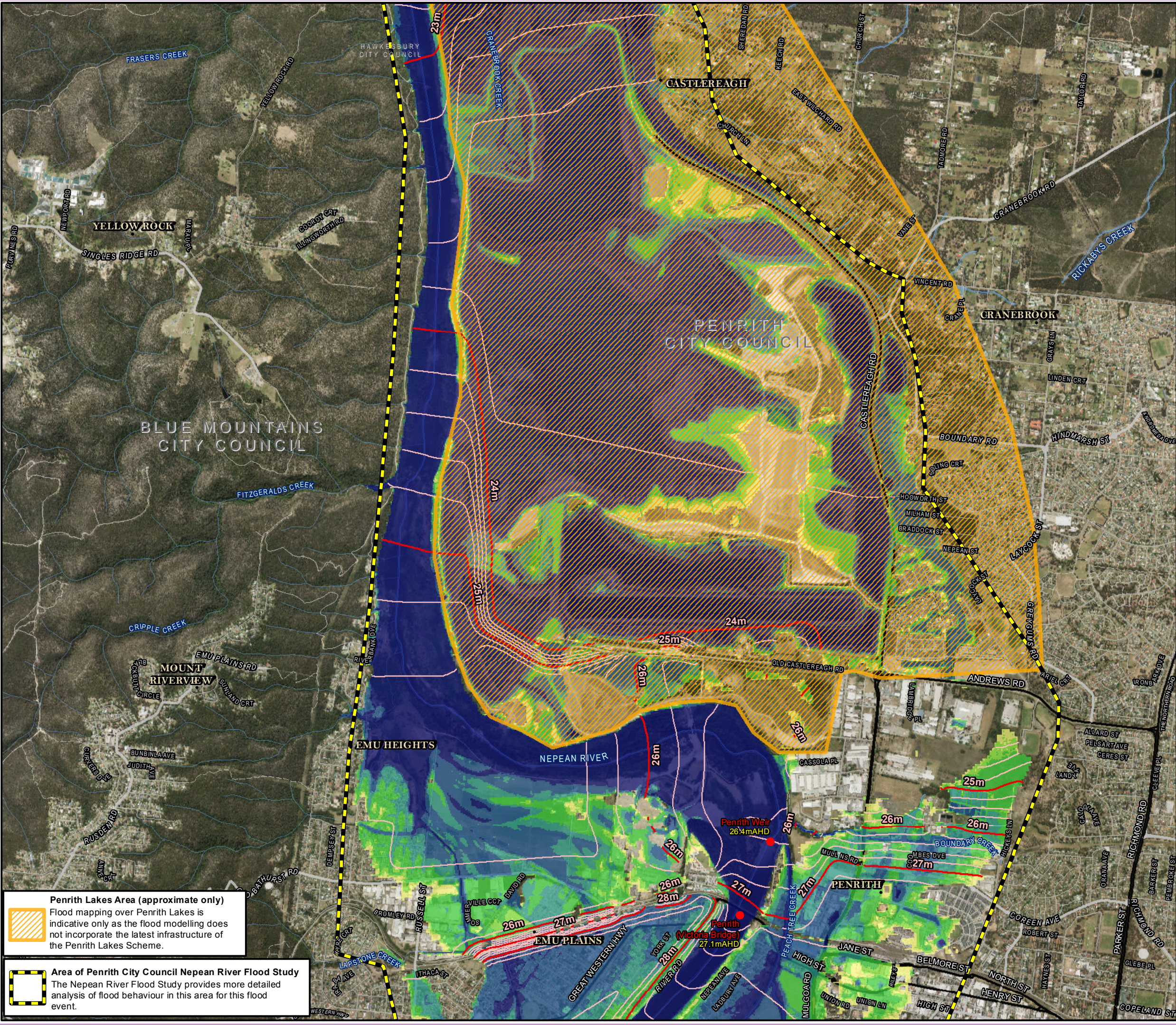
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500
Metres (1:28,000 at A3)

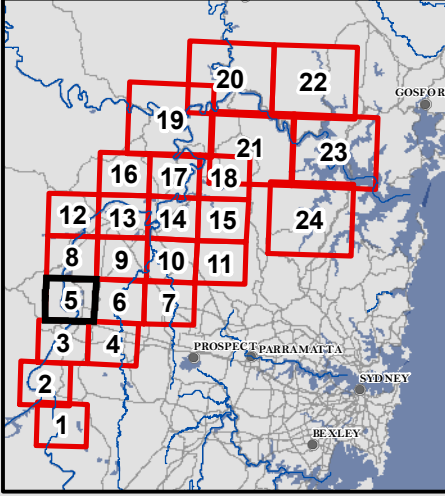
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Aerial photography: 2016 NSW Spatial Services



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Area of Penrith City Council Nepean River Flood Study
The Nepean River Flood Study provides more detailed analysis of flood behaviour in this area for this flood event.

Hawkesbury-Nepean Valley
Regional Flood Study
Final Report (July 2019)
Volume 3: Map Book - Part B
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 1,000 AEP flood
(0.1% chance per year flood)



Legend

● Key reporting locations and flood level

Flood depths

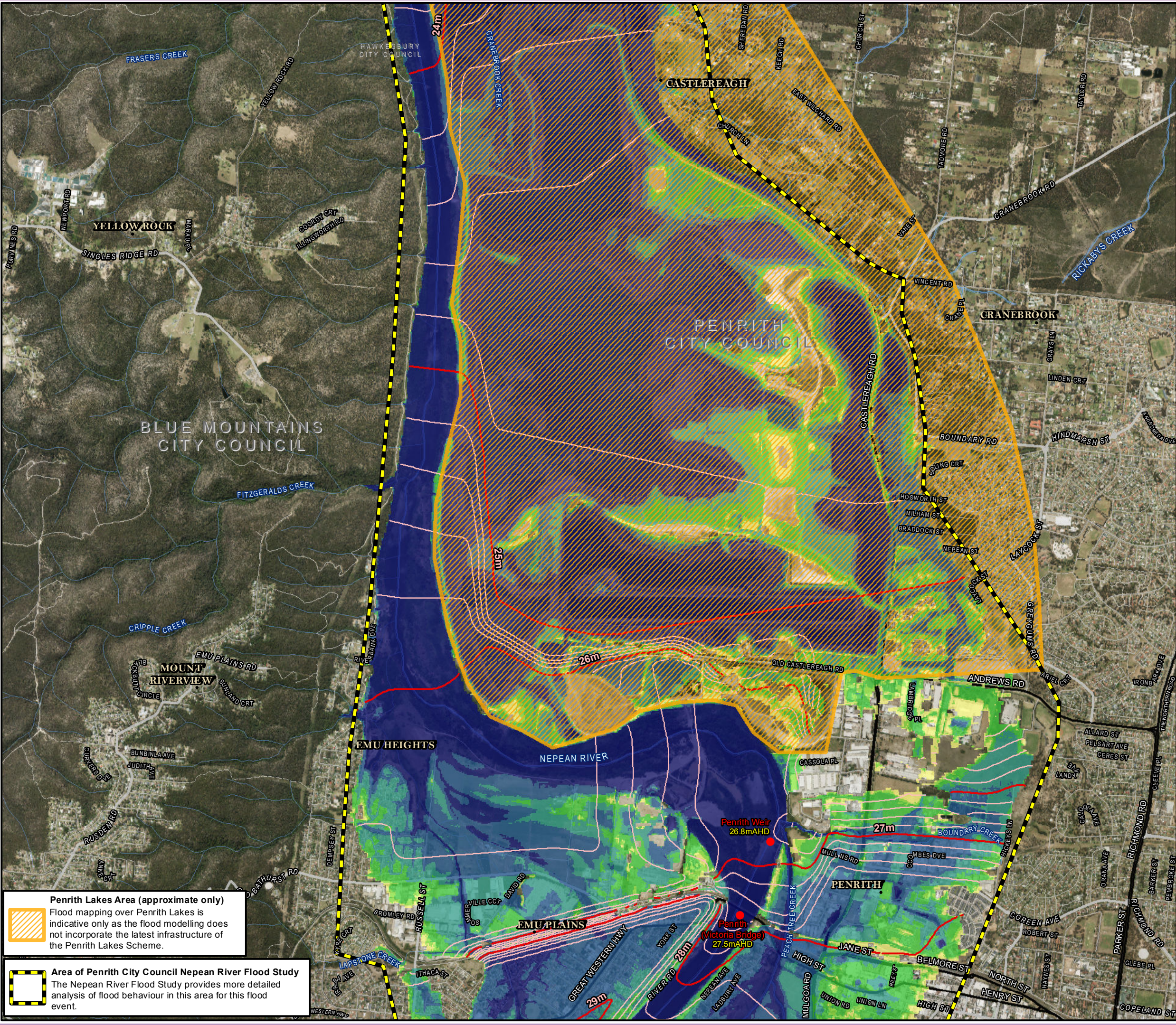
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval

0 750 1,500
Metres (1:28,000 at A3)

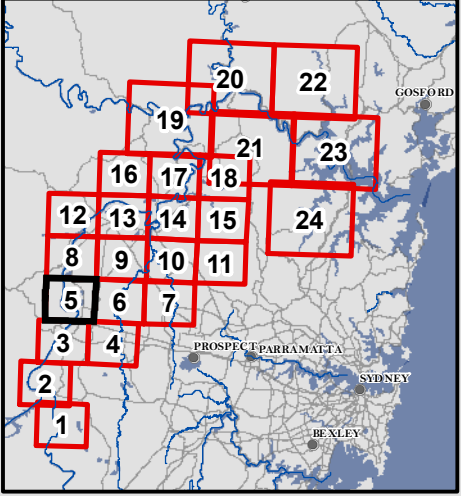
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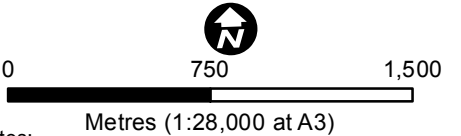
Penrith Lakes Area (approximate only)
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Area of Penrith City Council Nepean River Flood Study
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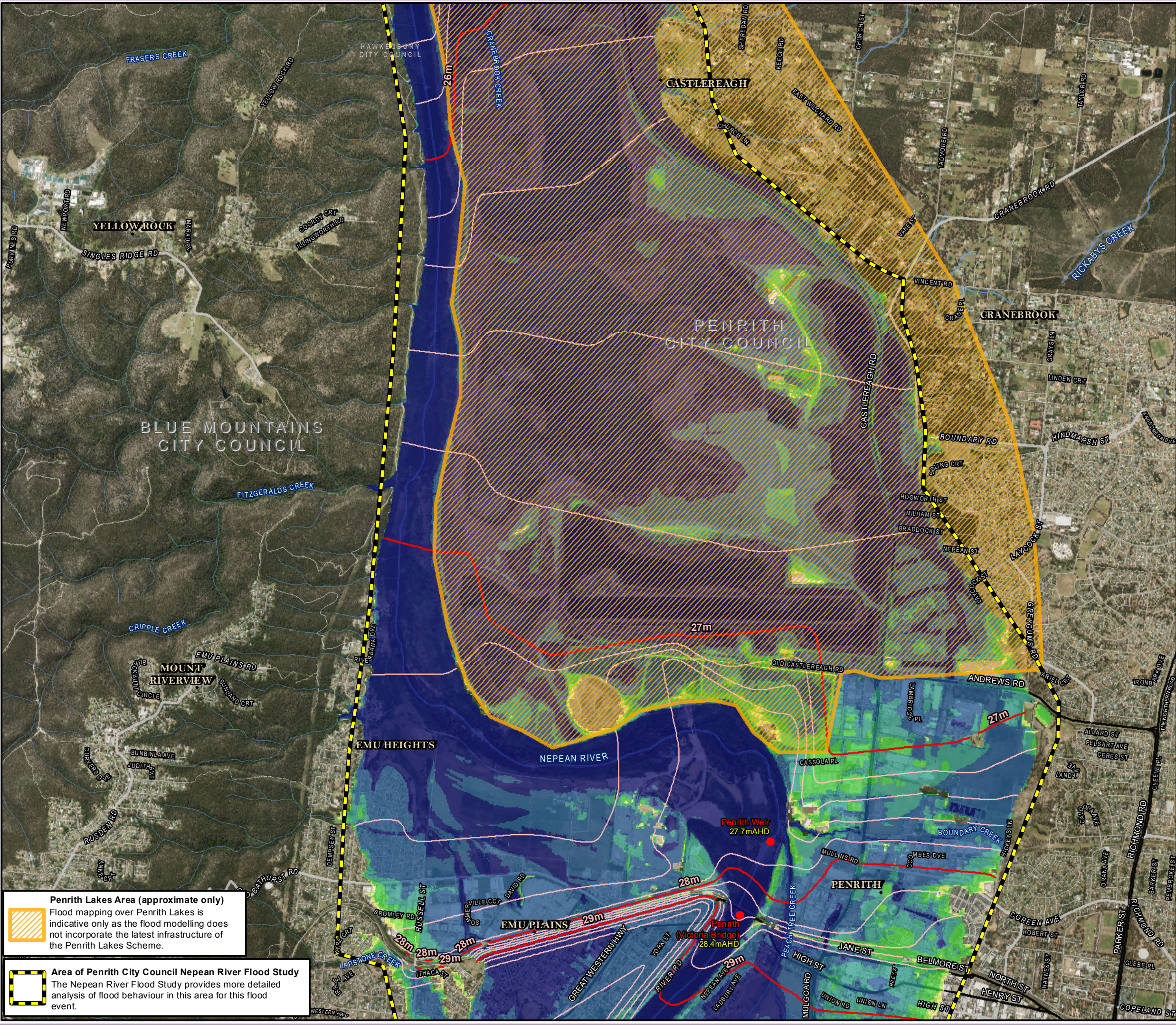
**Hawkesbury-Nepean Valley
Regional Flood Study**
Final Report (July 2019)
Volume 3: Map Book - Part B
**FLOOD EXTENTS, DEPTHS
AND CONTOURS**
1 in 2,000 AEP flood
(0.05% chance per year flood)



- Legend**
- Key reporting locations and flood level
- Flood depths**
- 0 - 0.3m depth
 - 0.3 - 0.5m depth
 - 0.5 - 1.2m depth
 - 1.2 - 2m depth
 - 2 - 4m depth
 - >4m depth
- Flood contours (m AHD)**
- Flood Level Contours at 1 metre interval
 - Flood Level Contours at 0.2 metre interval



Notes:
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- Area of Penrith City Council Nepean River Flood Study**
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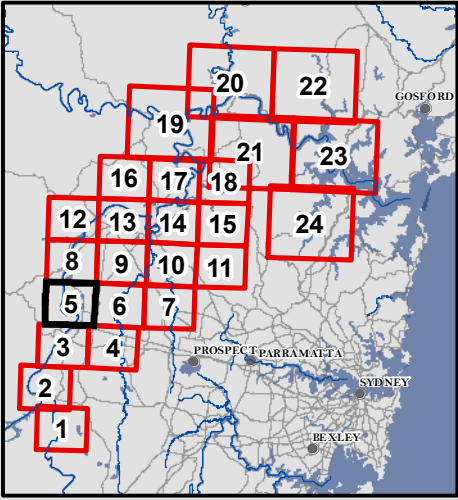
**Hawkesbury-Nepean Valley
Regional Flood Study**

Final Report (July 2019)

Volume 3: Map Book - Part B

**FLOOD EXTENTS, DEPTHS
AND CONTOURS**

**1 in 5,000 AEP flood
(0.02% chance per year flood)**



Legend

● Key reporting locations and flood level

Flood depths

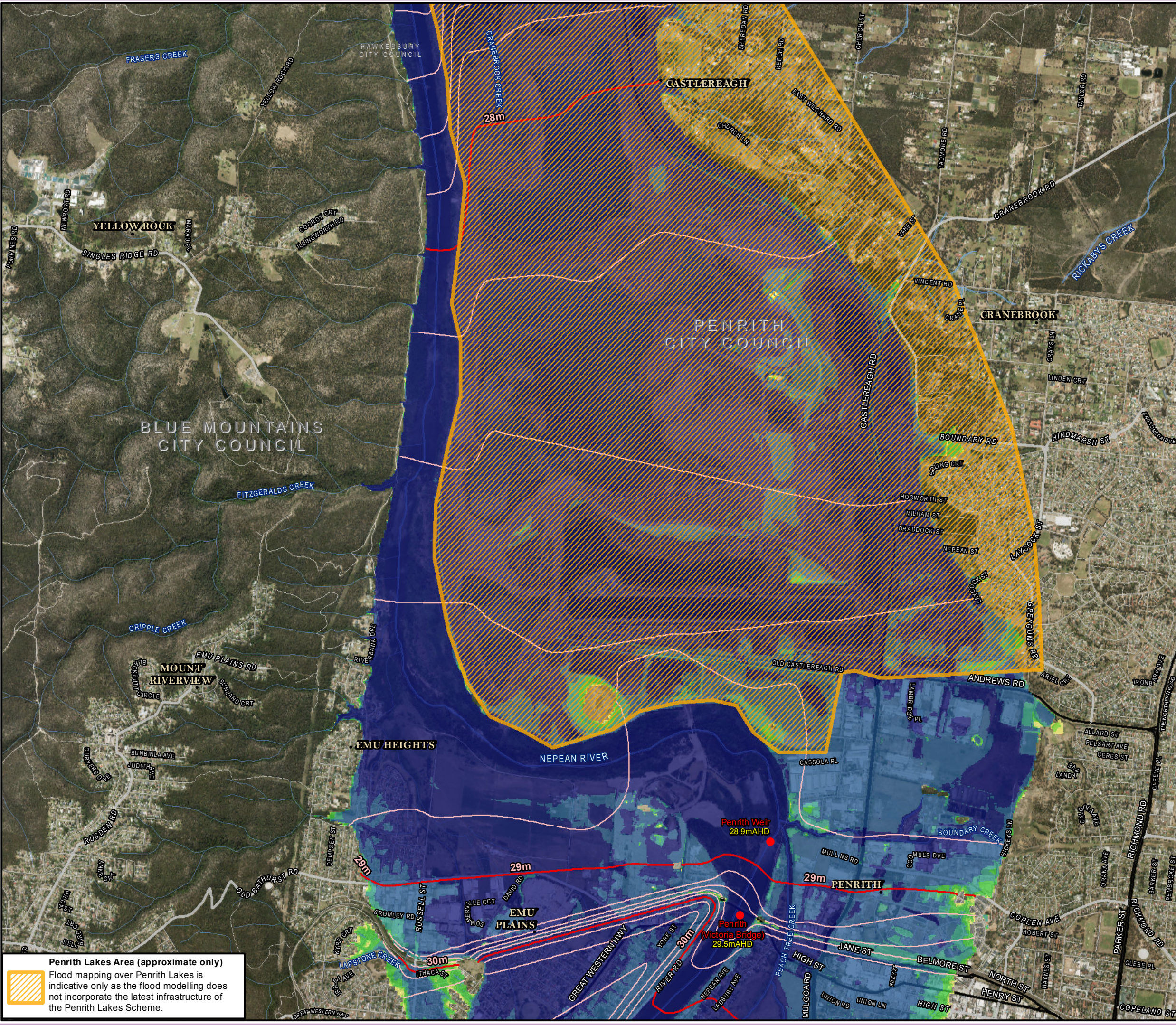
- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval



Notes:
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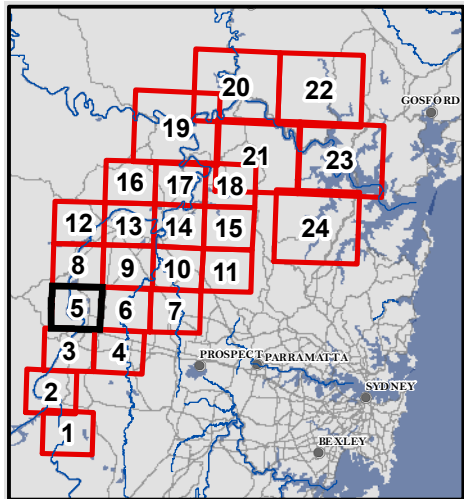
Hawkesbury-Nepean Valley
Regional Flood Study

Final Report (July 2019)

Volume 3: Map Book - Part B

FLOOD EXTENTS, DEPTHS
AND CONTOURS

Probable Maximum Flood (PMF)



Legend

● Key reporting locations and flood level

Flood depths

- 0 - 0.3m depth
- 0.3 - 0.5m depth
- 0.5 - 1.2m depth
- 1.2 - 2m depth
- 2 - 4m depth
- >4m depth

Flood contours (m AHD)

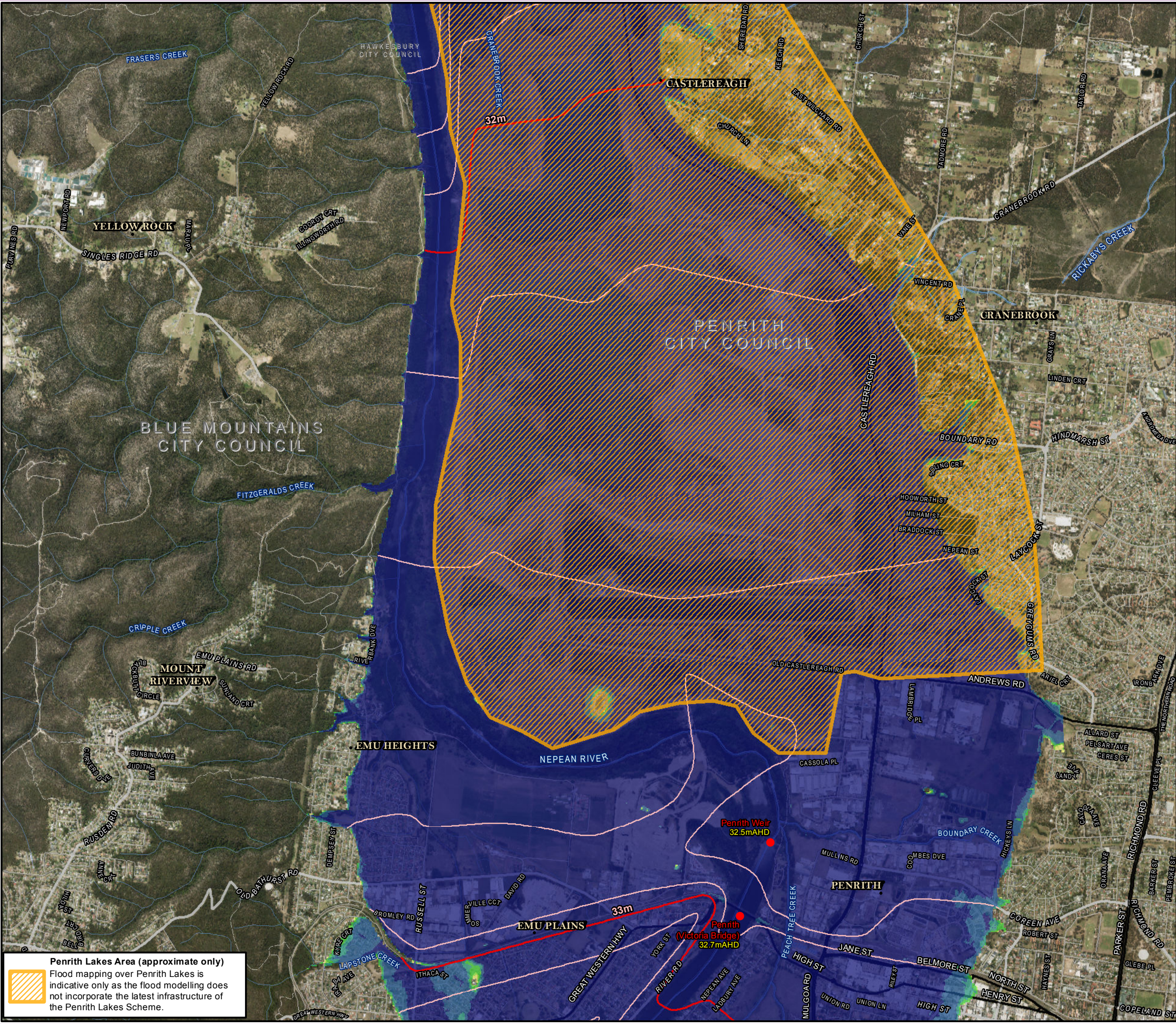
- Flood Level Contours at 1 metre interval
- Flood Level Contours at 0.2 metre interval



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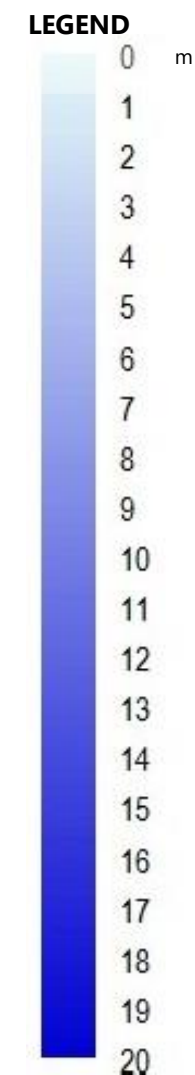
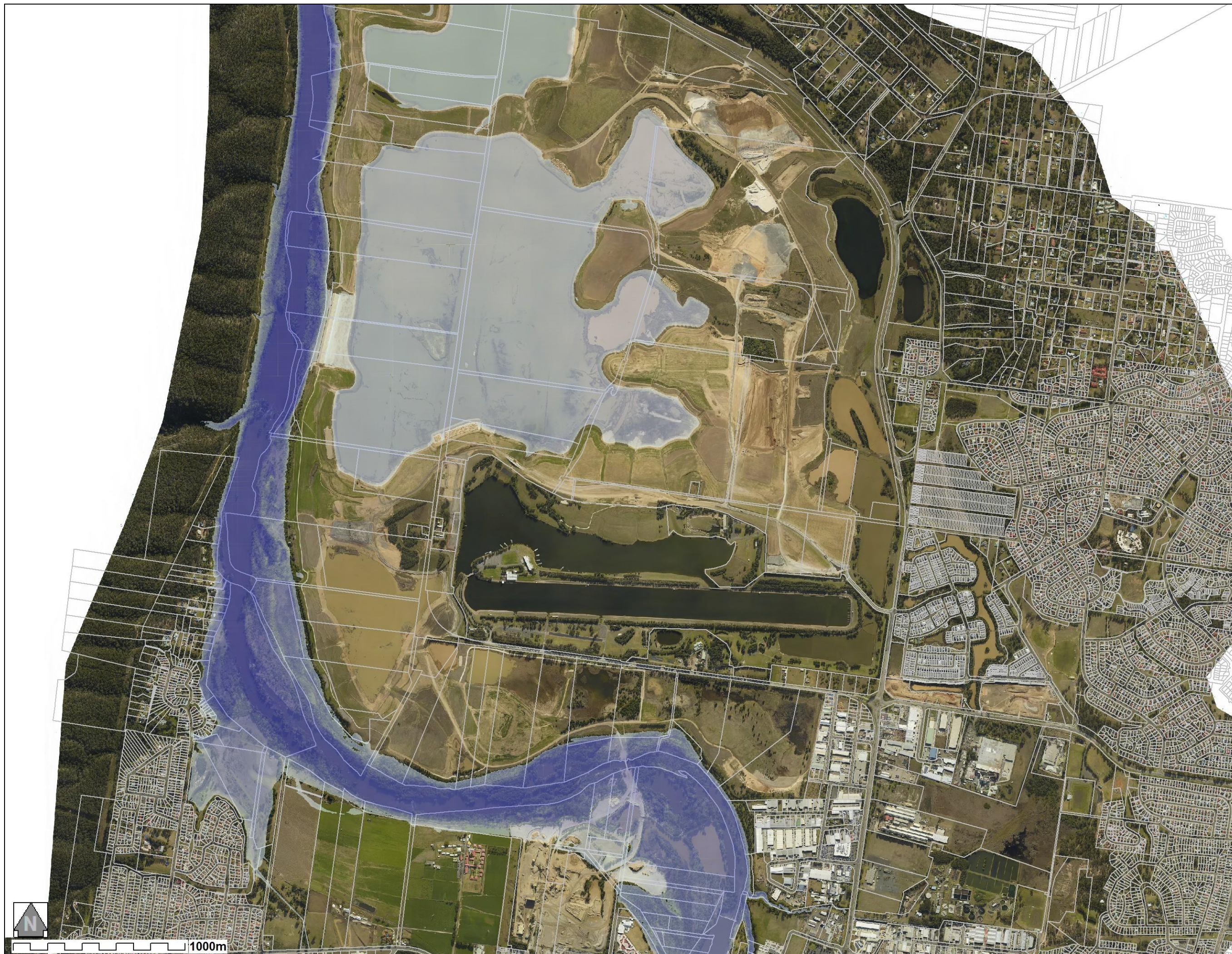
Aerial photography: 2016 NSW Spatial Services



Penrith Lakes Area (approximate only)

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APPENDIX D – MAPS EXTRACTED FROM THE NEPEAN RIVER FLOOD STUDY (ADVISIAN, 2017)



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
20 year ARI**

MAP 024_B

Scale 1:20,000 [A3]

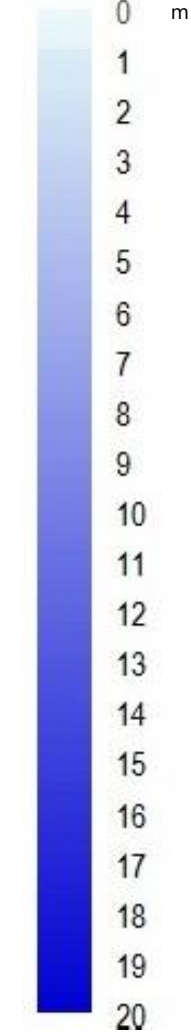
5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

**PENRITH
CITY COUNCIL**

 **Advisian**
WorleyParsons Group



LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
50 year ARI**

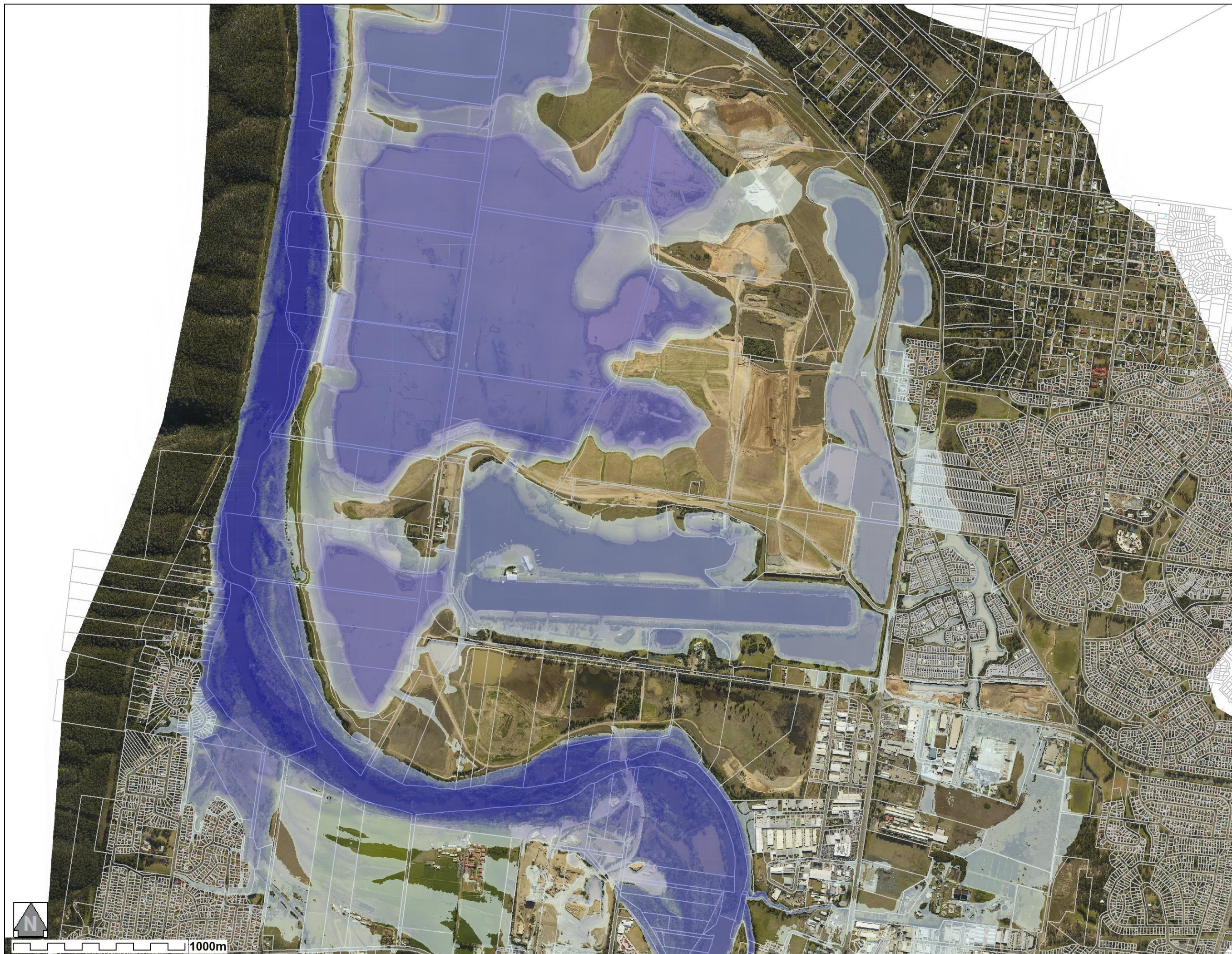
MAP 025_B

Scale 1:20,000 [A3]

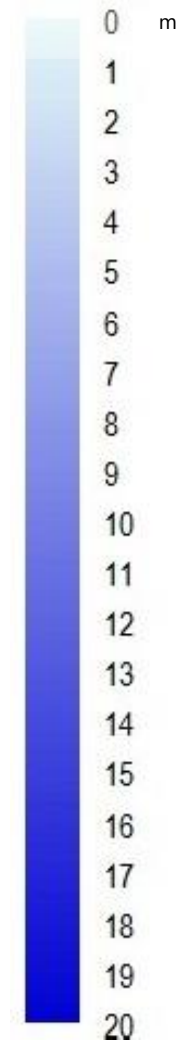
5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

**PENRITH
CITY COUNCIL**

 **Advisian**
WorleyParsons Group



LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
100 year ARI**

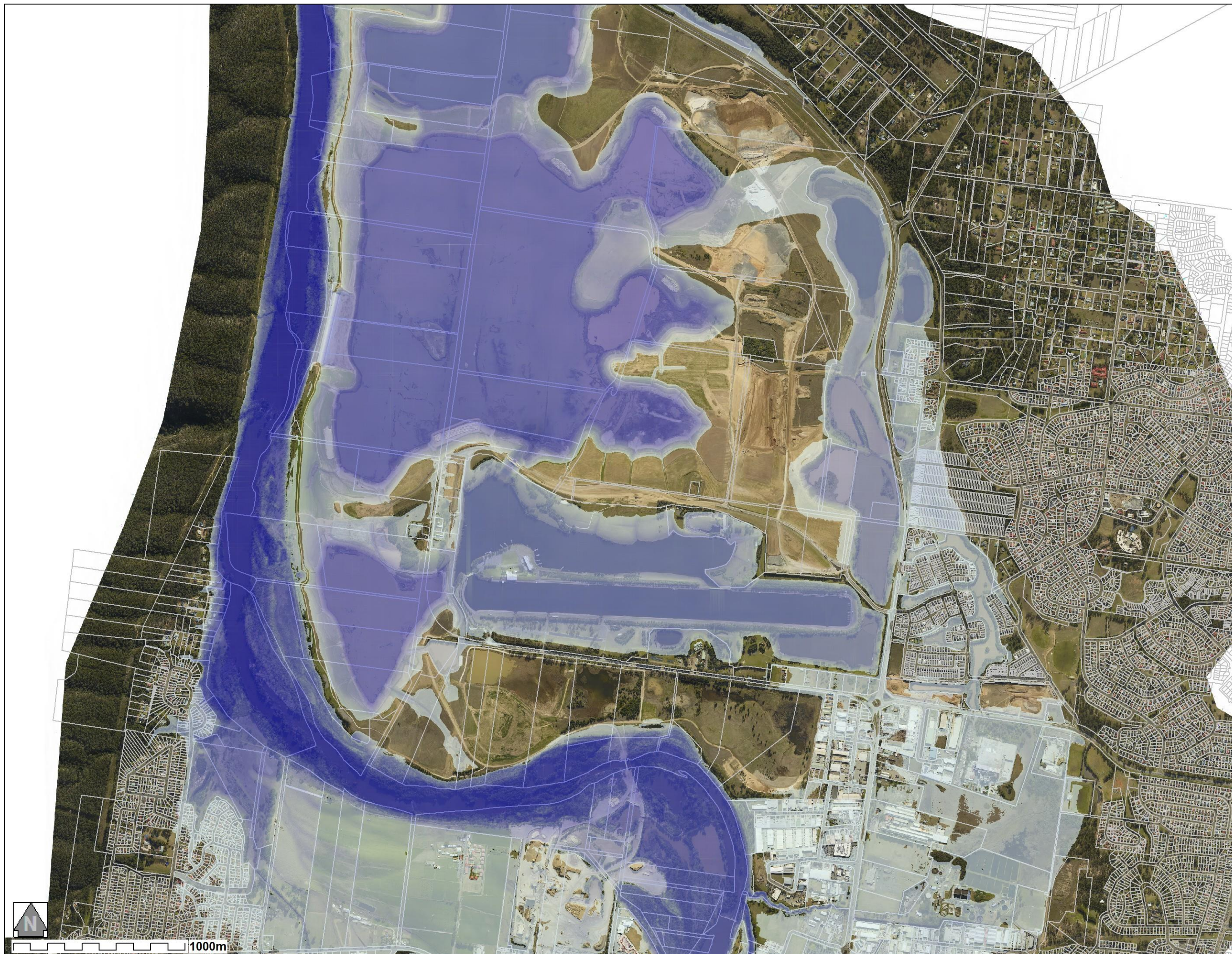
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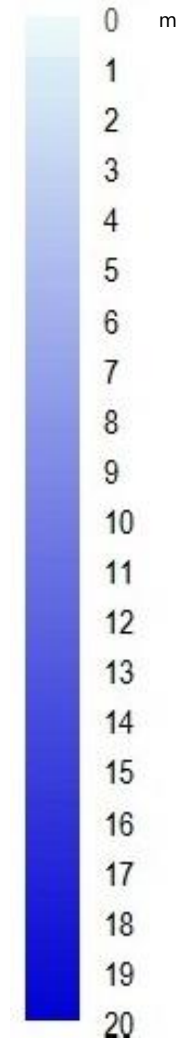
5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

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CITY COUNCIL**

 **Advisian**
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LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
200 year ARI**

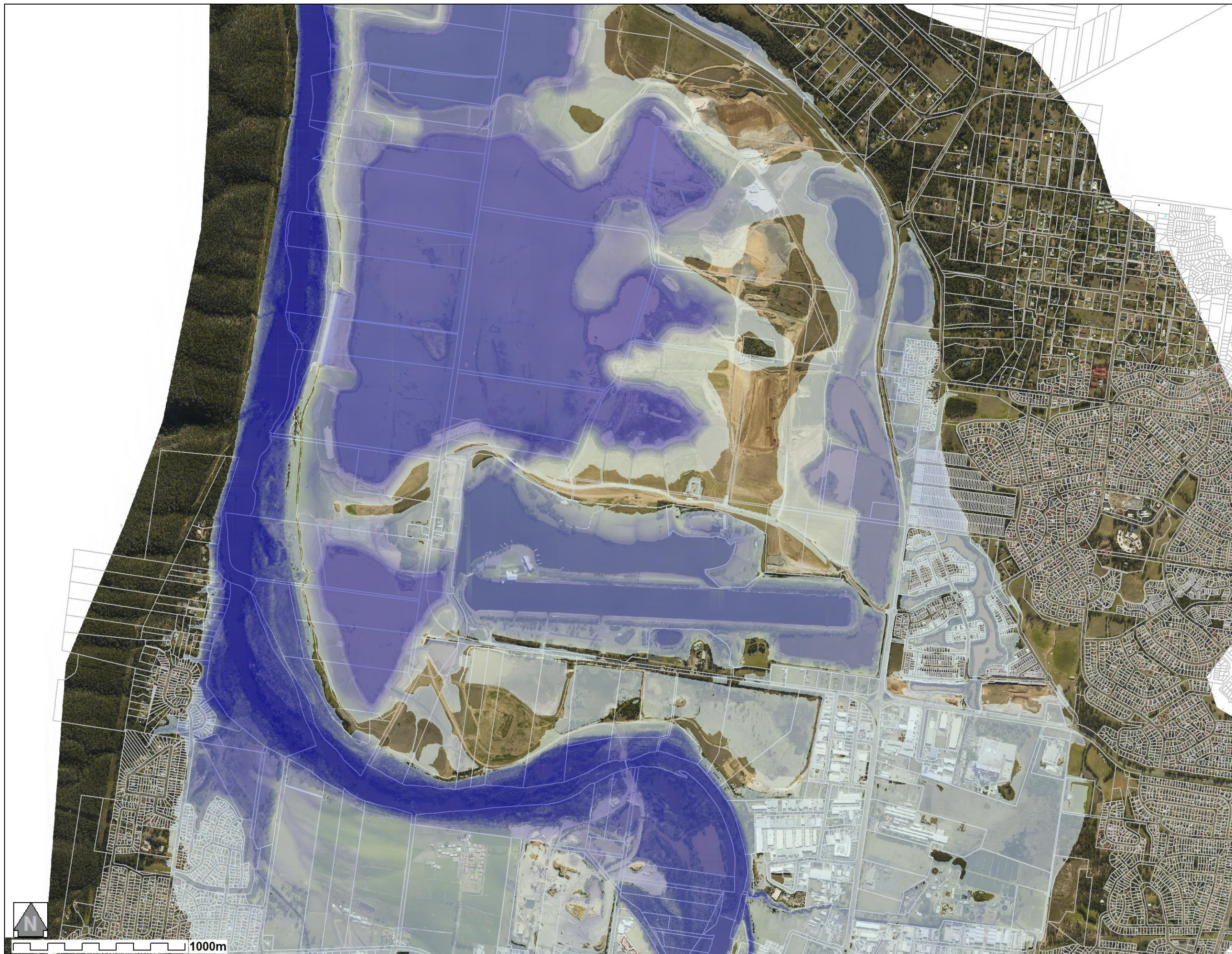
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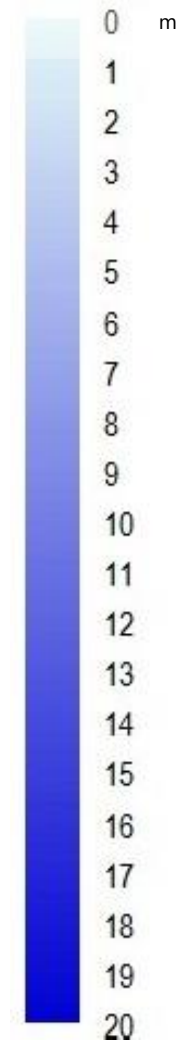
5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

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WorleyParsons Group



LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
500 year ARI**

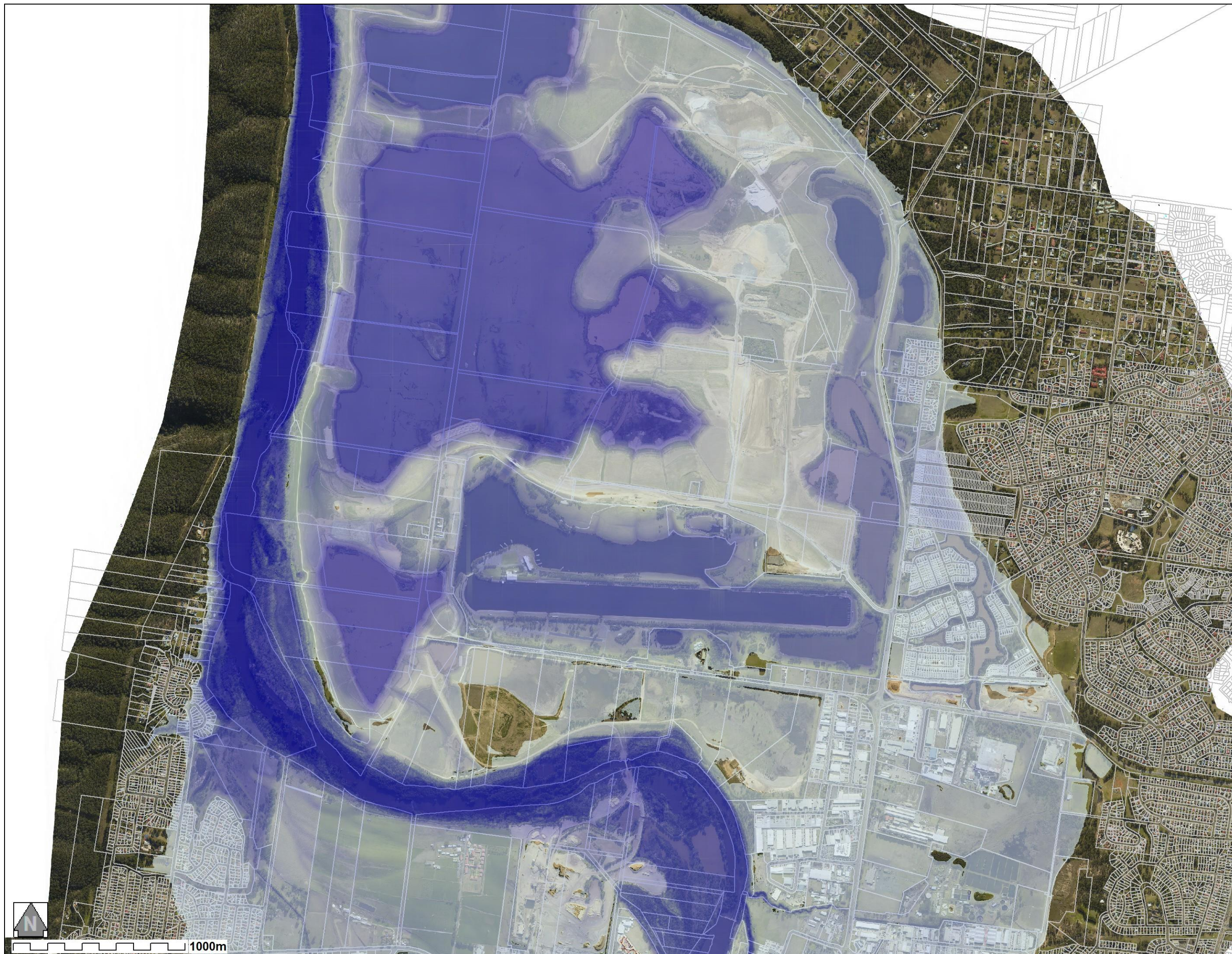
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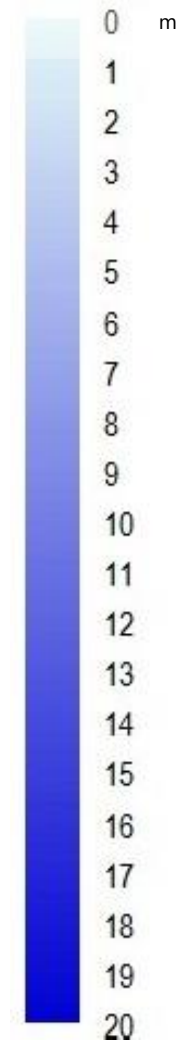
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**PENRITH
CITY COUNCIL**

 **Advisian**
WorleyParsons Group



LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
1000 year ARI**

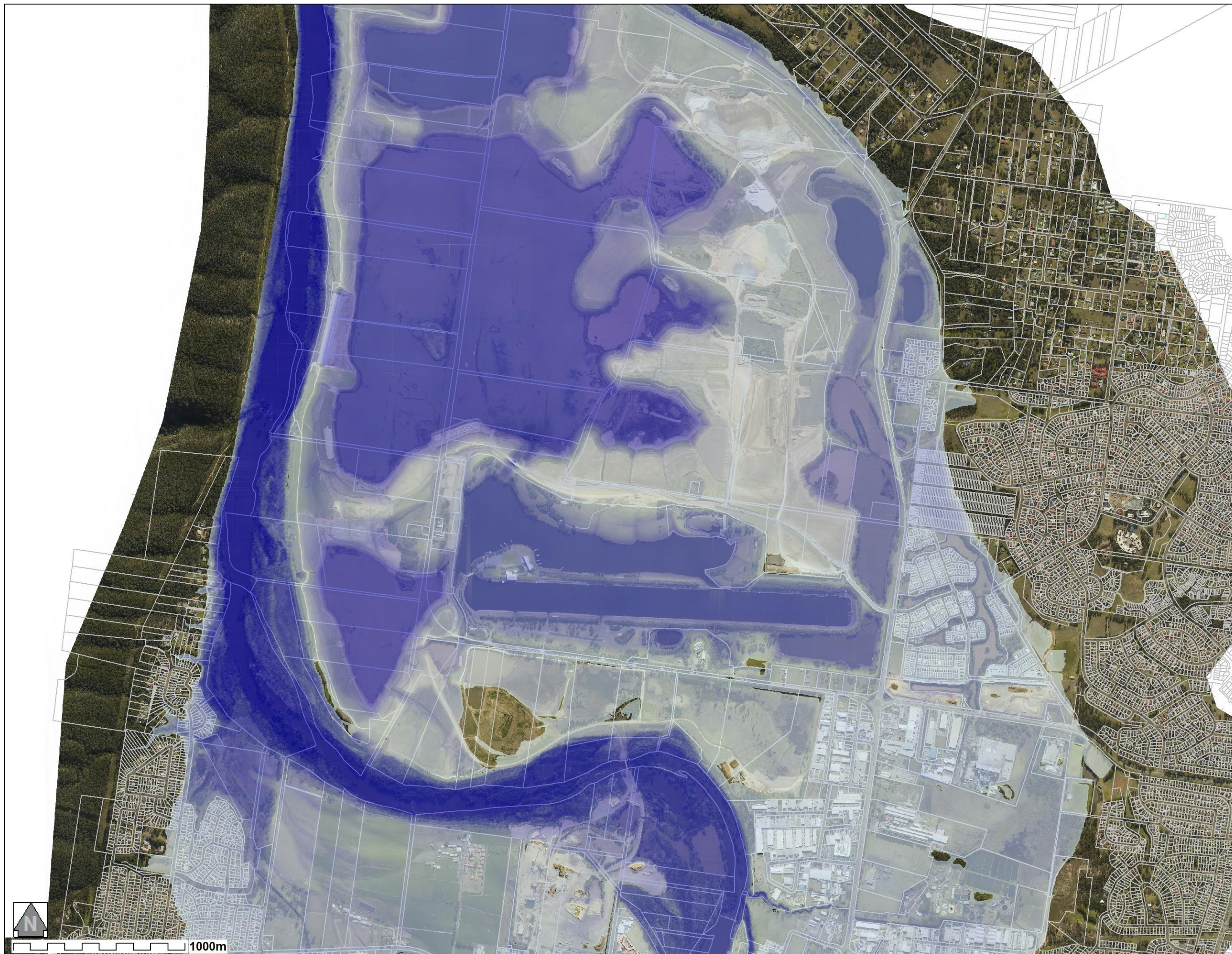
MAP 029_B

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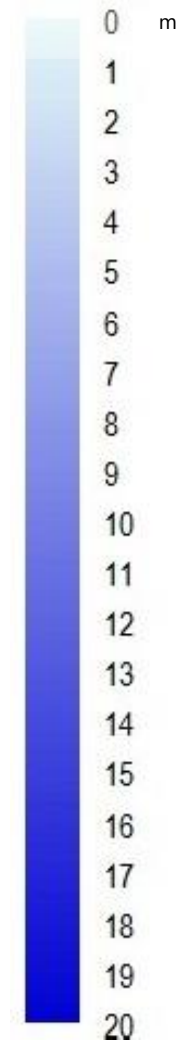
5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

**PENRITH
CITY COUNCIL**

 **Advisian**
WorleyParsons Group



LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
2000 year ARI**

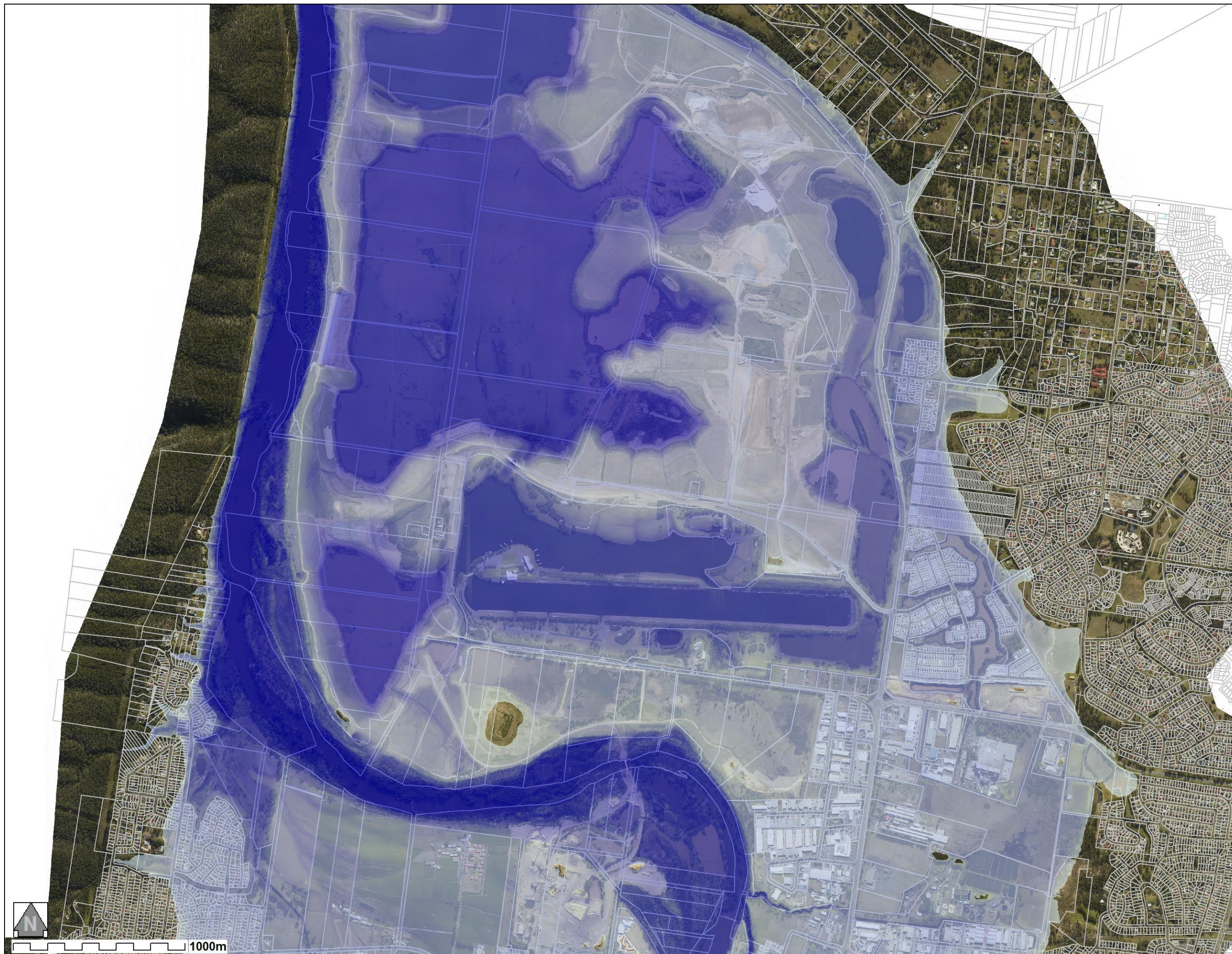
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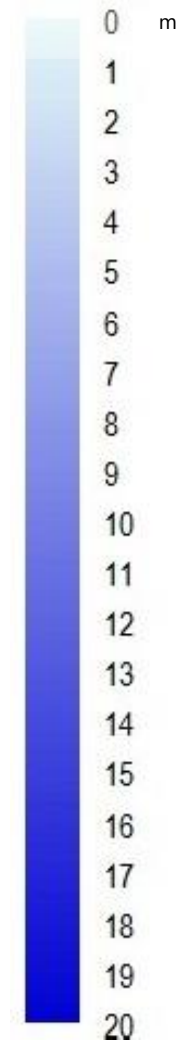
5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

**PENRITH
CITY COUNCIL**

 **Advisian**
WorleyParsons Group



LEGEND



**NEPEAN RIVER
FLOOD STUDY**

**Flood Depth
Surface
PMF**

MAP 031_B

Scale 1:20,000 [A3]

5/11/2018
rp301077-14401-dmc-FS-
Maps-r1.docx

PENRITH
CITY COUNCIL

 **Advisian**
WorleyParsons Group

APPENDIX E – SIGNS TO GUIDE FLOOD EVACUATION ROUTES

Signs to guide people along the regional flood evacuation routes towards safer areas.

- 4 Direction at the intersection



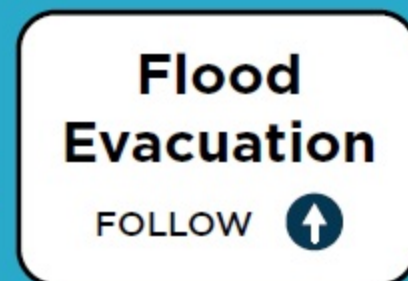
- 3 Advance notice of turns



- 2 Shows you're still on the route



- 1 At the start of the route



APPENDIX F – HAWKES-NEPEAN FACT SHEET “GET PREPARED FOR FLOOD”

Get Prepared for Flood

**SOME SIMPLE ACTIONS
CAN SAVE LIVES**

Your local flood risk

The Hawkesbury-Nepean Valley has a long history of flooding.

When there is heavy rainfall, water flows down five major rivers into the floodplain. It is slowed from reaching the ocean by around 80 kilometres of narrow gorges from Ebenezer to Spencer. This means that floodwater can back up and rise quickly, causing wide, deep and dangerous floods.

There are hidden dangers in floodwater like debris, electrical wires, pollutants and sewage. In a flood, bridges can be cut, roads closed, public transport routes interrupted, power lost and mobile phone and internet connections disrupted.

It is important for everyone who lives in the floodplain to be prepared. For more information see www.myfloodrisk.nsw.gov.au

How to prepare before a flood

- ✓ **Know where to get updates and warnings**
 - Bureau of Meteorology for local weather updates
 - NSW State Emergency Service (NSW SES) for information on floods and storms
 - ABC Radio as the official emergency broadcaster

✓ Prepare a 'Get Ready to Go' Kit

What to pack:

1. Health care items like medications and prescriptions
2. Copies of your important documents (hard copies or stored digitally)
3. Important valuables and momentos
4. Important phone numbers
5. Radio, torch, phone chargers and batteries
6. Clothing and personal items

✓ Make a plan for evacuation

Know where you will go, how you will get there, what evacuation routes you can use, what you will do with your animals, and how you will manage your health

✓ Share your plan

Talk with your relatives, friends, and neighbours about what you will do if you need to evacuate

What to do during a flood



Follow NSW SES Flood Advice and Emergency Warnings

- Listen to your local ABC radio station for up to date flood information and advice
- Follow advice from NSW SES. If you are asked to evacuate, don't wait until it is too late



Take your 'Get Ready to Go' Kit

- This should include your medications, prescriptions and any assistance equipment



Take your animals

- Put them on leashes or in carriers
- Take food, medication and registration/vaccination documents



Know where to go

- Follow advice on evacuations and check live traffic information
- Make your way to relatives or friends outside the floodplain if you can
- Official evacuation centres will be announced at the time of the emergency



Look out for each other

Share information with family, friends, and neighbours. Help each other especially people who may need assistance



Where to find information

Useful websites to visit and phone apps to download

- Local weather updates: www.bom.gov.au and Bureau of Meteorology app
- Local ABC Radio frequency: <https://reception.abc.net.au> and ABC Listen app
- Flood and storm updates: www.ses.nsw.gov.au www.facebook.com.au/NSW.SES
- Plan for your animals: www.getreadyanimals.nsw.gov.au
- Live traffic information: www.livetraffic.com and Live Traffic app



Need help?

For emergency help in floods call NSW SES on 132 500

For all life threatening emergencies call 000

- Hearing/speech impaired SMS NRS: 0423 677 767
- Internet Relay: <https://internet-relay.nrs�all.gov.au>
- If you are homeless call **Link2Home** on **1800 152 152**
- If an interpreter is required, emergency services can access translation services



My important contacts

Who will you need to contact in an emergency?

(e.g. emergency contact, relatives, friends, doctor, pharmacist, carer, support worker, Link2Home)

Name:

Phone:

Name:

Phone:

Name:

Phone:

Name:

Phone:

Name:

Phone:



My checklist

I am prepared because:



→ I know where to find information like weather updates, warnings and advice

→ I know where I will go in an evacuation and how I will get there

→ I know what I will take with me

→ I have talked with my household about what we will do if we need to evacuate

→ I have a plan for keeping my animals safe

→ I know how I will manage my health

→ I have talked through my plan with relatives, friends and neighbours

→ I have a list of my important numbers ready

8 TIPS

YOU CAN DO NOW TO PREPARE FOR FLOODS

1

KNOW YOUR RISK



2

KNOW WHERE TO GO



3

KNOW WHO TO CALL



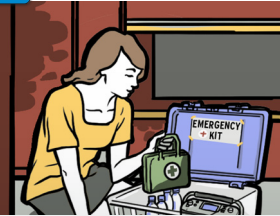
4

KNOW YOUR PLAN



5

GET YOUR KIT
TOGETHER



6

PREPARE NOW TO
ACT EARLY



7

CHECK YOUR INSURANCE



8

LISTEN TO LOCAL RADIO



APPENDIX G – SES CONSULTATION

Our Ref: ID2007

Your Ref:

30 June 2023

Andrew Beattie
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

email: andrew.beattie@planning.nsw.gov.au
cc: rra@ses.nsw.gov.au

Dear Andrew,

Flood Emergency Response Plan for 89-151 Old Castlereagh Road, Castlereagh

Thank you for the opportunity to provide comment on the Flood Emergency Response Plan (FERP) for the proposed Helipad development at 89-151 Old Castlereagh Road, Castlereagh.

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.

It is the preference of NSW SES that all developments follow the application of sound land use planning, flood risk management, site design and stormwater management measures that minimise any risk to the community. Furthermore, developments that are at known risk of flooding or isolation are closed prior to flooding commencing and when there is an indication that flooding is likely, for example, when there is a Watch and Act product issued by NSW SES indicating evacuation may be required.

The NSW SES has reviewed the proposed FERP and the flood risk information (e.g. Local Flood Plan, Flood Studies etc.) available to the NSW SES, noting the proposed development is at risk of flooding in a and the adjacent roads may be cut by floodwaters. In accordance with sections 3.6, A-5, L-5, L-6.9.6 and N-7 of the NSW Floodplain Development Manual, 2005 (the Manual), 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.

The NSW SES does not have statutory authority to endorse or approve flood emergency response plans, which is referred to in the Manual (particularly section N7), however provides the following advice based on the principles outlined in the Manual:

- **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 site itself is prone to flooding in a 20% AEP flood, with the hydraulic hazard in a PMF of H6, which is unsafe for people and vehicles, and all buildings are considered to be vulnerable to failure (Nepean River Flood Study 2017 and Hawkesbury-Nepean Valley Regional Flood Study 2019).

We are aware of a 2D Hawkesbury Nepean Valley Flood Study that is expected to be completed late 2023. The results from this flood study must be considered within managing the risk for the proposed development and be used to update the content within Section 4.1 and 4.2 of the FERP.

Continuing research by the Bureau of Meteorology and the CSIRO predicts more intense, short duration heavy rainfall events. The projected increase in heavy rainfall will increase flood risk in cities, built-up urban areas, and small catchments, where extreme rainfall over hours to a day not only can result in Hawkesbury-Nepean flooding but can also quickly become flash floods and cut roads prior to the onset of riverine flooding. This would impact on the evacuation of Penrith Lakes.

The operators of the new helipad would need to cognisant of the flood hazard at the site and factor that into their asset protection and business continuity planning.

- **Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes.**

In the context of future development, self-evacuation of the community should be achievable in a manner which is consistent with the NSW SES's principles for evacuation. Evacuation must not require people to drive or walk through flood water.

We understand that the total anticipated number of patrons and staff occupying the Sydney Helicopters site at any given time would be 60, with 40 parking spaces available onsite.

Currently the confident warning timeframe for the Penrith flood gauge is around 8 hours as specified in the Bureau SLS with a flood peak forecast criteria (70% +/- 0.3m).

The timeframe calculated for evacuation to be completed does not consider the potential for convergence on evacuation routes, potential traffic issues and delays associated with severe weather and road safety. This is likely to see the evacuation time to be longer than the "4 minutes" identified in the FERP (page 3), due to converging traffic from the surrounding areas including North Penrith Industrial Estate, Penrith Lakes developments, Lakeview Estate and the Industrial Estate north of Boundary Creek.

The time for evacuation is the time for the occupants of the site to reach The Northern Road, which would be much longer than 4 minutes due to significant congestion.

NSW SES does not support pedestrian evacuation as a primary evacuation strategy for the proposed development. It is unacceptable, as the primary evacuation strategy, to expect people to escape from a flood on foot (also referred to as overland escape/overland access), especially with the high likelihood of ongoing poor weather conditions and should not be used to justify the development. Pedestrian evacuation is a backup strategy.

The private motor vehicle is likely to be the most effective means of evacuation transport for most community members. The motor vehicle also provides an important although limited capacity for people to save some of their possessions or key business documents, most of which will almost certainly be lost in large floods.

Pedestrian evacuation is a rare phenomenon since car ownership became widespread and factors associated with a large-scale pedestrian evacuation are not well-understood. However, research following the 9/11 attack on the World Trade Centre indicates that the pedestrian evacuation that occurred was multi-modal, where many people walked to get a ferry, bus or train. Many complex issues were identified in this event, including the safety challenges of pedestrians and vehicles sharing routes, the large number of officials required to coordinate the evacuation on-ground, pedestrians being exposed to the weather, limited capacity to carry important documents and possessions particularly those requiring medicines or children's items and with pets.

In the context of the proposed development pedestrian evacuation would be constrained by:

- Distances that evacuees may need to travel. Evacuation by foot could exceed a distance greater than 1 km.
- Weather at the time of an evacuation becoming necessary. An evacuation by foot may coincide with heavy rainfall and strong winds which may dissuade people from selecting this strategy.
- Time of day. People may be reluctant to evacuate at night.
- Evacuation of people with special needs who may lack the mobility to evacuate by foot.
- Disruption to onsite and offsite infrastructure resulting in evacuees navigating streets, paths and bridges in darkness.
- Hazards such as downed powerlines due to strong winds and storm damage.

Similarly, evacuation by helicopter, also referred to as rescue, is not supported as a primary evacuation strategy. We note that this option has been conservatively left out of the evacuation calculations within the FERP. However, we would like to emphasise that the use of helicopters may not always be feasible during floods due to weather or other risks.

- **Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation. 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.**

Due to the potential flood hazard at the site, sheltering in a building at this location is not safe. Sheltering in buildings where entrances and exits may become flooded in the larger floods may result in isolating people potentially without food or water for several hours or more depending on the weather system/s. Isolation also increases the risk of fire or medical emergencies.

- **The FERP should be regularly reviewed, evaluated, updated and exercised regularly**

The FERP refers to the NSW SES Hawkesbury-Nepean Flood Plan from 2015. Please note the most recent version of this plan is 2020, and should be referred to. Under the 2020 Hawkesbury-Nepean Flood Plan, the site is contained within the Penrith North Sector, subsector 8.5 (Castlereagh). Penrith North Sector will need to be completely evacuated if the predicted flood level will exceed 8.2m at the Penrith gauge (Annex D Evacuation Management Arrangements, p66). The draft FERP is consistent with the triggers and evacuation routes (on page 2, not in the attached maps) listed in the 2020 Hawkesbury-Nepean Flood Plan.

These subsectors are being further refined with information from flood events and flood studies, such as 2021 and 2022 flooding as well as the revised 2D Flood Study being completed by INSW due for completion late 2023. This is a key example of why FERP's must be regularly reviewed and exercised.

We strongly encourage that the FERP aligns with the NSW SES triggers for evacuation, and ensure that the Advice, Watch and Act and Emergency Warning Products are received and adhered to by all occupants of the proposed development. However, given the relatively small increase in population as a part of the proposal, the evacuation capacity is not likely to be significantly impacted by this development alone.

We support alternative arrangements being made for commercial properties during a major flood to avoid being on the floodplain during flooding, such as closing the

business during a flood. However, the feasibility and economic losses associated with this must be considered.

Section 4.3 of the FERP discusses the “awareness” component of the FERP. However, this should also involve reducing human behaviour risks by undertaking regular exercising of the FERP similar to a building fire evacuation drill. This may also include emergency warning notification (or PA) system.

Section 4.4 contains outdated references to the “Sydney Western Region”, which should be updated to “Metro Zone”. Consistent with the Australian Warning System, NSW SES issues “Advice”, “Watch and Act” and “Emergency Warning” products that should be referred to within the FERP. These products align with the flood predictions issued by the Bureau of Meteorology.

Further useful information can be found:

- NSW SES website <https://www.ses.nsw.gov.au/disaster-tabs-header/flood/>
- Emergency Business Continuity Plan (<http://www.sesemergencyplan.com.au/business/>)
- The Department of Planning and Environment website <https://www.environment.nsw.gov.au/research-and-publications/publications-search/floodplain-development-manual>

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

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

Elspeth O'Shannessy

A/Manager Risk Assessment, Emergency Risk Management

NSW State Emergency Service

APPENDIX H – TFNSW CONSULTATION

From: [Nav Prasad \(TRAFFIC SAFETY\)](#)
To: [Sabina Lohani](#)
Cc: markh@sydneyhelicopters.com.au
Subject: RE: [110934.02] Helipad Site FEMP Consultation
Date: Friday, 1 September 2023 12:54:29 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

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Hi Sabina,

It is noted that this report has addressed the TfNSW requirement the updated report and that Penrith Council and the SES have been consulted on the updated Flood Evacuation Management Plan.

In this regard TfNSW have no further comments.

Regards

Nav Prasad

Development Assessment Officer
Planning and Programs
Greater Sydney

Transport for NSW

Ph. (02) 9983 3193

Level 4, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

Please note that I am contracted to TfNSW in a part time capacity and generally available Mondays, Tuesdays and Wednesdays only.



**Transport
for NSW**



I recognise and acknowledge that modern New South Wales is an overlay on Aboriginal land and that many of the transport routes of today follow songlines. Aboriginal people have followed for tens of thousands of years. I pay my respects to the Aboriginal people of NSW and Elders past and present.

Please consider the environment before printing this email.

OFFICIAL

From: Sabina Lohani <slohani@jwprince.com.au>
Sent: Friday, 11 August 2023 10:52 AM
To: Development Sydney <Development.Sydney@transport.nsw.gov.au>
Cc: markh@sydneyhelicopters.com.au
Subject: [110934.02] Helipad Site FEMP Consultation

You don't often get email from slohani@jwprince.com.au. [Learn why this is important](#)

CAUTION: This email is sent from an external source. Do not click any links or open attachments unless you recognise the sender and know the

Hi Zhaleh,

We note that Urbis Pty Ltd has prepared the Response to Submissions (RTS) report for Sydney Helicopters in February 2022 in response to the community and agency submissions received during the public exhibition of the Environmental Impact Statement (EIS) for a proposed Helipad facility. As per the 2022 report, it is understood that TfNSW has stated primary evacuation routes have been incorrectly identified and the proposal should revisit flood evacuation procedures and include consultation with NSW State Emergency Services on the preferred regional evacuation path.

As a Part of the DA approval requirement, J. Wyndham Prince has prepared the FEMP for the Helipad site at Penrith and SES has been consulted. Please find the FEMP for the site provided in the link below for your consideration.

[Helipad Site FEMP](#)

If you have any questions, please do not hesitate to contact me.

Kind Regards,

Sabina Lohani – Manager-Stormwater & Flooding



P 02 4720 3342 **M** 0416 018 959
W www.jwprince.com.au

Level 2, 50 Belmore Street, Penrith NSW
PO Box 4366 PENRITH WESTFIELD 2750

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APPENDIX I – NSWRA CONSULTATION

Attn: Sabina Lohani
Manager-Stormwater & Flooding
J. Wyndham Prince
Level 2, 50 Belmore St
PENRITH NSW 2750

Sydney Helicopters– Proposed Helicopter Facility at 89-151 Old Castlereagh Road, Castlereagh – Flood Evacuation Management Plan (FEMP) – request for comments

Dear Sabina,

I refer to your email dated 11 August 2023 seeking to comply with a Development Approval (DA) condition requiring the Hawkesbury-Nepean Valley Flood Risk Management Directorate within Infrastructure NSW be consulted on flood evacuation management plan (FEMP) for the proposed Sydney Helicopters facility at 89-151 Old Castlereagh Road, Castlereagh.

From 1 July 2023 the functions and staff of the Hawkesbury-Nepean Valley Flood Risk Management Directorate in Infrastructure NSW were transferred to the New South Wales Reconstruction Authority (NSWRA). This response is therefore coming from the NSWRA.

The NSWRA notes that the assessment of the regional flood risk has utilised the Penrith City Council Nepean River flood study. The NSWRA is completing an updated Hawkesbury-Nepean Flood Study, and the NSWRA will be consulting with the community on the results of this study in the third quarter of 2023. This study, which includes assessment of recent flood events, indicates that flood levels have risen in the Penrith floodplain, and are projected to increase even further with climate change. Penrith City Council is aware of and has access to the results of this flood study, and the results have been provided to the Department of Planning and Environment and Penrith City Council.

In terms of regional flood evacuation risk, the development adds to the considerable evacuation traffic generated from the Castlereagh area, which is to increase with the construction of the Nepean Business Park and other developments. The development would need evacuation for events greater than 1 in 20 chance per year, and vehicles would have a number of road low points before rising above PMF. This means the evacuation risk to life is relatively low, but people in vehicles should be aware that they may have problems getting onto The Northern Road due to both day-to-day traffic and evacuation and diverted traffic from other parts of the floodplain during flood events.

The NSW State Emergency Service (SES) is the combat agency for flood events, and is responsible for managing flood events including flood emergency evacuations. The NSWRA support the issues they raised in their letter on the FEMP to the Department of Planning and Environment dated 30 June 2023 (attached). Also during flood emergencies the directions from the SES and other emergency response agencies must prevail over the measures outlined in the FEMP.

If you have any questions, please do not hesitate to contact the Directorate at emma.whale@reconstruction.nsw.gov.au or phone – 0424766061.

Yours sincerely

A handwritten signature in cursive script that reads "Whale".

Emma Whale

A/Head of Hawkesbury-Nepean Valley Flood Risk Management

Reconstruction NSW

Att: Letter dated 30 June 2023 from NSW SES to the Department of Planning and Environment on the Flood Evacuation Management Plan (FEMP) for the Proposed Helicopter Facility at 89-151 Old Castlereagh Road, Castlereagh