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Director
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Online submission via NSW Planning Portal

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Dear Sir/Madam

Development Application for Café and Wine Bar at 100 Old Castlereagh Road, Castlereagh

Thank you for the opportunity to provide comment on the Development Application for Café and Wine Bar at Longs House 100 Old Castlereagh Road, Castlereagh. It is understood that the proposed development seeks change of use of a disused dwelling cottage at 100 Old Castlereagh Road, Castlereagh to a wine bar and café, involving the installation of a commercial kitchen.

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 principles which are of importance to the NSW SES role as described above are further detailed in Attachment A.

We refer to our advice regarding the Helipad development at 89-151 Castlereagh Road, Castlereagh dated 30 June 2023. It is understood that the evacuation capacity has been calculated in the Flood Evacuation Management Plan for the Sydney Helicopters site including the café.

In summary, our advice regarding the Flood Emergency Response Plan is still relevant, with several updates required. Although we do not have significant concerns regarding the

proposed development, it must be noted that the proposed café is located on a low flood island, meaning that evacuation routes will become flooded prior to the site itself becoming inundated. As such, to protect lives it is essential that the site is closed and fully evacuated prior to evacuation routes becoming cut. Flood modelling shows that evacuation routes would become flooded prior to a 1% AEP flood event¹, prior to the site itself becoming inundated in a 1 in 1000 year flood event². The site is also at risk of extreme high hazard flooding in the PMF³.

You may also find the following Guidelines, originally developed for the Hawkesbury Nepean Valley and 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 Claire Flashman 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



Elspeth O'Shannessy

A/Manager Emergency Risk Assessment, Emergency Risk Management

NSW State Emergency Service

¹ Penrith Overland Flow Flood Overview Study 2006

² Flood Risk Assessment for Sydney Helicopters Cottage Upgrade, May 2023, page12

³ Flood Risk Assessment for Sydney Helicopters Cottage Upgrade, May 2023, page12

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁴

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

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. Any proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the relevant local or state flood plan or by the NSW SES.

Evacuation must not require people to drive or walk through flood water.

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Risk assessment should 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.

We refer to our previous advice dated 30 June 2023, and note that 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.

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

There are challenges associated with flood planning, warning, evacuation, and response timing for any future development in the Hawkesbury Nepean floodplain.

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.

⁴ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

Consent authorities should consider the cumulative impacts any development will have on risk to life and the existing and future community and emergency service resources in the future.

Principle 4 Decisions on redevelopment within the floodplain does not increase risk to life from flooding.

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 the development in the Hawkesbury Nepean floodplain who may not be familiar with the flood risks.

Principle 6 Recognise the need for effective flood warning and associated limitations.

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.

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.

As previously advised, "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, 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."

While not proposed for this development, strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation. 'Shelter in place' strategy is not an endorsed flood management strategy by the NSW SES for future development. Such an approach is only considered suitable to allow existing dwellings that are currently at risk to reduce their risk, without increasing the number of people subject to such risk. The flood evacuation constraints in an area should not be used as a reason to justify new development by requiring the new development to have a suitable refuge above the PMF. Allowing such development will increase the number of people exposed to the effects of flooding. Other secondary emergencies such as fires and medical

emergencies may occur in buildings isolated by floodwater. During flooding it is likely that there will be a reduced capacity for the relevant emergency service agency to respond in these times. Even relatively brief periods of isolation, in the order of a few hours, can lead to personal medical emergencies that have to be responded to.

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

In order to ensure that any emergency management strategy remains effective and up-to-date, it must be exercised, evaluated and reviewed regularly. Ongoing community awareness should also include awareness of any changes to risk levels or procedures. For example, if updated flood modelling indicates that an earlier trigger height is required for safe evacuation, this should be incorporated into the emergency management strategy, messaging, and practice exercises.

This is clearly demonstrated by the FERP currently referring to a superseded version of the Hawkesbury-Nepean Flood Plan. As highlighted in our previous advice:

“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”.