

18 February 2019

Ms Anne-Maree Carruthers
Director, Sydney Region West
NSW Department of Planning and Environment
GPO Box 39 Sydney NSW 2001
Our ref: ID959
Attention: Mr Matthew Black (e: Matthew.Black@planning.nsw.gov.au)

Re: Planning Proposal - 27 Park Road, Vineyard and 41 Park Road, Mulgrave

Dear Mr Black,

Thank you for the opportunity to comment on the Planning Proposal 27 Park Road, Vineyard and 41 Park Road, Mulgrave ('Planning Proposal'). The NSW State Emergency Service (NSW SES) was forwarded the Planning Proposal from the Infrastructure NSW (INSW) Hawkesbury Nepean Flood Risk Management Directorate.

The NSW SES has the legislative responsibility for the protection of life and property during flood, storm and tsunami and has a strong interest in ensuring the safety of existing and future at risk communities. The NSW SES supports land use planning and development that adequately considers risks and results in development that is safe for the current and future populations. The NSW SES also takes into account the cumulative impact of development in areas that have significant flood risk and evacuation constraints, such as the Hawkesbury Nepean floodplain, to which the Planning Proposal is located.

The NSW SES works with Infrastructure NSW (INSW), Office of Environment and Heritage (OEH), the Department of Planning and Environment (DPE) and relevant local government councils in addressing the evacuation constraints in the Hawkesbury Nepean floodplain. It is from this background that the NSW SES provides the following comments on the Planning Proposal.

Planning Proposal

The Planning Proposal seeks to rezone existing RU4 (Primary Production – Small Lots) land to IN1 (General Industrial). There is currently one house on each of the existing lots.

STATE HEADQUARTERS

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Flood risk at the sites

The sites that are the subject of the Planning Proposal are impacted by backwater flooding from the Hawkesbury Nepean River. The sites are not impacted in a 1 in 100 year (1%) Annual Exceedance Probability (AEP)/ 1 in 100 year Average Recurrence Interval (ARI) flood (**Attachment 1**) and there is access to and from the sites during a flood of this magnitude; however the sites are inundated in a 1 in 500 year (0.2%) AEP flood (**Attachment 2 b**) and access is cut from the sites in a flood between the 1 in 200 year and 1 in 500 year AEP flood (refer **Attachments 2a and 2b**).

NSW SES comments / concerns

The NSW SES has reviewed the Planning Proposal and considers that although the sites are outside of the flood extent to which the statutory flood planning level applies – i.e. outside the 1 in 100 year AEP flood, the sites do exhibit flood risk that will need to be managed during a flood event that exceeds the 1 in 100 year AEP flood. This will include the need to evacuate future occupants from the site during a severe flood.

Flood evacuation routes from the sites

People located on the subject sites will need to be evacuated to ensure their safety during severe floods (i.e. floods forecast to exceed the 1 in 100 year AEP flood. There are two possible evacuations routes from the site that future occupants will need to use to ensure their safety during a severe flood. This includes:

1. Park Road in an easterly direction to Windsor Road towards the Rouse Hill area.
2. Park Road in a westerly direction to Railway Rd North across the railway crossing to Hawkesbury Valley Way evacuation route along Railway Rd South.

However, as Park Road is flooded at a low point to the east of the site in a 1 in 50 year AEP flood, the alternate route would then need to be used. This route will convey evacuation traffic from the Windsor area; however it is likely that there would be capacity on the Hawkesbury Valley Way route until the railway crossing is cut around 1 in 500 year AEP flood.

Assessing the cumulative impact of the Planning Proposal on the regional evacuation routes

It is necessary to assess the cumulative impact of the Planning Proposal on the regional evacuation routes to ensure that the change in land use does not impact on the existing regional evacuation capacity in the Hawkesbury Nepean Valley.

Currently there are only two residential houses on the two sites. Therefore it is likely that the number of people working at the site and potentially being located on the

site will increase. Therefore with the change in land use proposed by the Planning Proposal, the demand on the available regional evacuation routes will increase; however the extent of this increased impact will depend on the type of industrial development that is located on the land.

The NSW SES has assessed the impact the change in land use proposed by the Planning Proposal will have on the regional evacuation routes. It is the NSW SES's opinion that the change in land use to industrial use on the sites will lead to a minor impact on the regional evacuation routes, as the current evacuation arrangements include that Windsor would be evacuated before the 1:100 AEP flood height is reached (17.3m) and in this case there would be capacity on the Hawkesbury Valley Way route for the future occupants of 27 Park Road, Mulgrave and 41 Park Rd Vineyard to evacuate prior to the railway crossing closing in a flood around 1:500 AEP.

Future flood related controls on the development at the site

Although not subject of the Planning Proposal, the NSW SES considers that controls that minimise potential damage to structures on the future sites would help minimise the damage and resulting financial cost involved recovering from the effects of a flood. This is especially important in less probable but higher consequence events, from the 1:200 year ARI flood up to and including the probable maximum flood.

The Planning Proposal states:

*'The proposed industrial zoning of the site could allow for the erection of industrial buildings, without providing risk to safety in terms of flooding/water management. **Future development could be appropriately design(ed) and conditioned in this regard.** (p 50) (emphasis added).'*

The NSW SES encourages Council to place suitable flood related controls on the sites at the development application stage that would result in minimising potential property damage during a severe flood.

Thank you for the opportunity to comment on the Planning Proposal. The NSW SES looks forward to working with the Department of Planning and Environment in the future and is available to meet to discuss this matter further if required. The NSW SES would like to be involved early in the planning process to ensure that potential high flood risk proposals are assessed for their strategic planning merit before they cause unnecessary costs to proponents and government agencies.

Please contact Peter Cinque on (02) 8811 7700 or Marcus Morgan on (02) 4251 6665 if you wish to discuss any of the matters raised in this correspondence.

Yours sincerely,

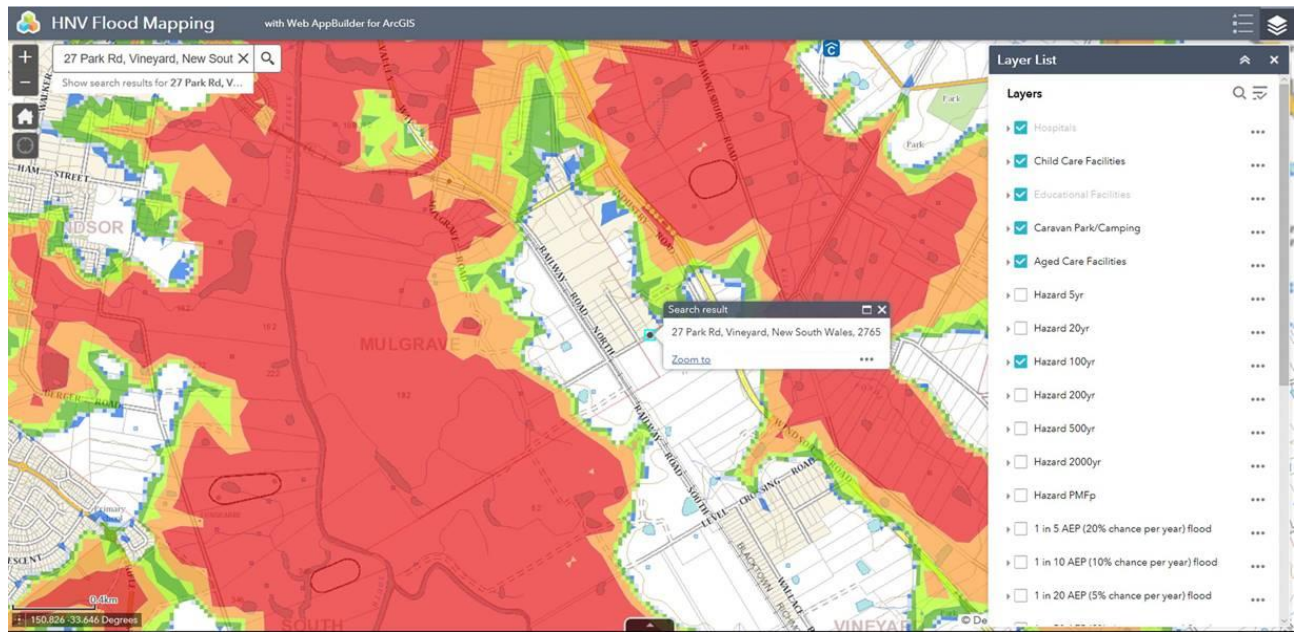
A handwritten signature in dark ink, appearing to read 'P. Cinque', is positioned above the printed name.

Peter Cinque ESM OAM
Principal Advisor, Hawkesbury-Nepean Strategy
NSW State Emergency Service

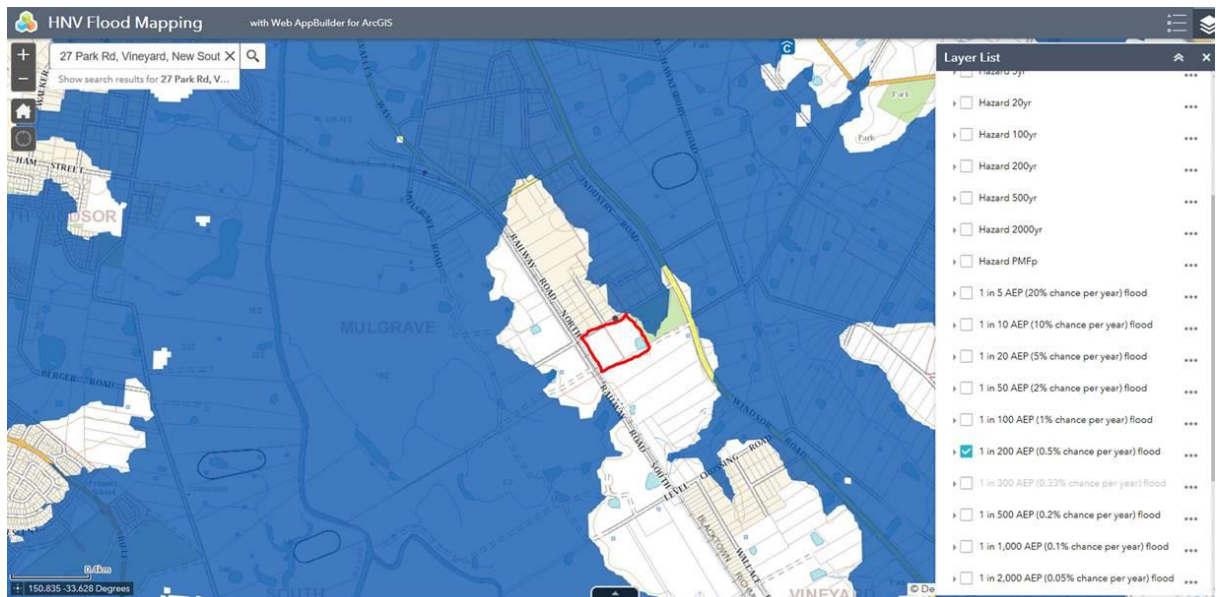
Cc: George Jeoffreys, Senior Manager Risk Reduction and Avoidance; Marcus Morgan, Planning Coordinator (future risk)

Attachment

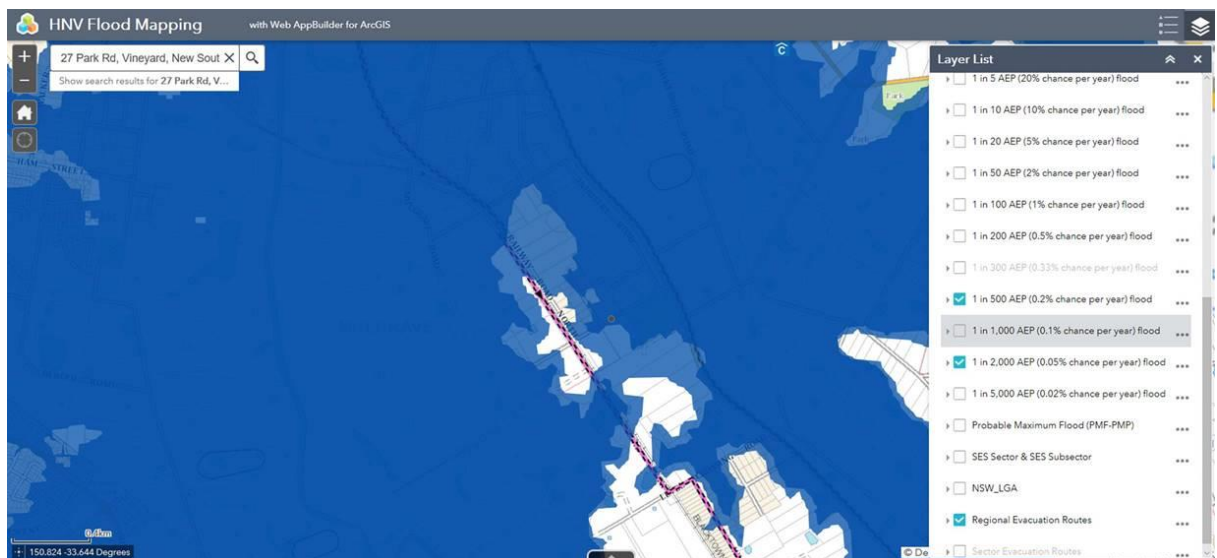
1. 1 in 100 year (1%) Annual Exceedance Probability (AEP) flood (provided by INSW Hawkesbury Nepean Flood Risk Management Directorate)



2. 1 in 200 year (0.5%) and 1 in 500 year (0.2%) Annual Exceedance Probability (AEP) flood (provided by INSW Hawkesbury Nepean Flood Risk Management Directorate)



a. 1 in 200 year (0.5%) Annual Exceedance Probability (AEP) flood



b. 1 in 500 year (0.2%) Annual Exceedance Probability (AEP) flood

End of submission