Our Ref: ID 2702
Your Ref: DA/2024/763

4 November 2024

Emmilia Marshall
Maitland City Council
263 High Street
Maitland NSW 2320

email: shakira.muldoon@maitland.nsw.gov.au
CC: lisa.ignatavicius1@ses.nsw.gov.au

Dear Emmilia,

Concept Development Application for Anambah Road, Gosforth

Thank you for the opportunity to provide advice on the concept Development Application (DA) for 559 Anambah Road, Gosforth. It is understood that:

- the site was the subject of a planning proposal which resulted in the rezoning of RU2 Rural Landscape land to predominantly R1 General Residential in December 2020 under Maitland Local Environmental Plan 2011 (Amendment No. 26)[1].
- the concept DA seeks approval to create a new urban subdivision within the Anambah Urban Release Area, consisting of approximately 900 low and medium density residential lots, open space, roads, pedestrian networks, utilities and services, intersection upgrades and drainage infrastructure.
- the application also includes Stage 1 of the development, being the construction of 240 residential lots and associated works including road access via Anambah Road and construction of River Road for emergency access during floods[2].

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

[1] Barr Planning. 2024. Statement of Environmental Effects – Concept DA, Stage 1 DA, page 10
[2] Barr Planning. 2024. Statement of Environmental Effects – Concept DA, Stage 1 DA, page 8

Environmental Planning and Assessment Act, 1979. Some of the relevant issues which are of concern to the NSW SES are detailed in Attachment A.

In summary, we:

- **Note** the construction of River Road (which will only be operational during flood events[3]) is intended to establish connection with residential areas of Windella (south) and provide flood free egress above the 1% AEP local catchment flood for the development.[4]
- **Note** all proposed lots appear to be located on land above the PMF (both riverine and local catchment)[5].
- **Recommend** infrastructure, including the proposed River Road, are in place prior to development occurring to avoid the considerable risks of placing such a large number of people at risk of frequent and potentially long duration of isolation.
- **Recommend** investigating upgrades to the wider road infrastructure to support the existing and future communities, in consultation with the Reconstruction Authority, who have responsibilities under the State Disaster Mitigation Plan.
- **Recommend** the proposed River Road is a publicly accessible road, that is maintained to an appropriate standard for use in wet weather by large volumes of traffic. Further, the road should avoid any potential obstacles to emergency evacuation such as locked gates etc.
- **Recommend** considering the impacts of climate change. It is estimated that the actual probability of a 1 in 100 AEP for the Hunter River catchment is approximately a 1 in 65 AEP event for the current 2024 scenario[6]. For the proposed development site, this could result in more frequent isolation than what is currently expected based on previous modelling.
- **Recommend** seeking advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour for adjacent and downstream areas, particularly as fill is being proposed.

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 Ana Chitu 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

[3] Barr Planning. 2024. Statement of Environmental Effects – Concept DA, Stage 1 DA, page 19
[4] Northrop. 2024. Flood Impact and Risk Assessment, page 8
[5] Northrop. 2024. Flood Impact and Risk Assessment, figure BC6-1
[6] WMAwater. 2024. Climate Change Calculator. Retrieved 18/10/24 from https://ccc.wmawater.com.au/

interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,

Peter Cinque
Senior Manager, Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[7]

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

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.

According to the NSW State Flood Plan[8] and the Maitland City Flood Emergency Sub Plan[9], evacuation is the primary emergency management strategy for people impacted by flooding.

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, including climate change considerations.

The site appears to be on a High Flood Island.

Local Catchment Flooding

The site is impacted by local creek flooding, which, in the post-development conditions, appears to be contained within the proposed riparian corridor and on-site detention basins for flood events up to the 1 in 500 AEP.[10] In the PMF event (post-development scenario), there appears to be flooding (H4 – H5 flood hazard level[11]) on parts of the proposed internal roads.[12] However, as for the riverine flooding, all lots appear to be located on land above the PMF, and the proposal provides for the local drainage gullies to be maintained in the riparian corridor.[13]

The critical duration for local creek flooding is 2 hours or less for all modelled events, with the critical duration for the PMF event between 15 to 45 minutes,[14] suggesting that the local creek catchment area is prone to flash flooding, characterised by a rapid rise of floodwater and generally short durations. Following the proposed intersection upgrades, Anambah Road (at the north and south culvert crossings E01/E02)[15] would have flood immunity up to the 10% AEP local catchment events[16].

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[7] NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline
[8] NSW Government. 2021. NSW State Flood Plan. Section 1.6 – Key Principles. 1.6.2, page 5.
[9] NSW SES. 2022. Maitland City Flood Emergency Sub Plan. Section 1.6 – Key Principles. 1.6.2, page 7
[10] Northrop. 2024. Flood Impact and Risk Assessment, Figure BC4-3
[11] Northrop. 2024. Flood Impact and Risk Assessment, Figure BC6-3
[12] Northrop. 2024. Flood Impact and Risk Assessment, Figure BC6-1
[13] Northrop. 2024. Flood Impact and Risk Assessment, page 25
[14] Northrop. 2024. Flood Impact and Risk Assessment, page 20
[15] Northrop. 2024. Flood Impact and Risk Assessment, Figure 4
[16] Northrop. 2024. Flood Impact and Risk Assessment, page 24

Riverine Flooding

The site becomes impacted by flooding up to 5 metres depth from the Hunter River PMF in isolated areas around its northeastern and southern boundaries[17] [18], however it appears that all of the lots are on land above the PMF.

Flooding of the Hunter River, which impacts Anambah Road at multiple locations south of the site in events as frequent as 20% AEP, would have significantly flood depths (between 5 – 10 metres)[19] and isolation could extend over 50 hours in extreme events.[20]

Proposed Infrastructure

The construction of the emergency access River Road (which will only be operational during flood events[21]) is intended to provide flood free egress in the 1% AEP local catchment flood for the development.[22] This road would still be overtopped in the more severe events, with H5 - H6 flood hazard level in a PMF event across River Road. However provides a much higher level of flood immunity.[23]

It should be noted that the New England Highway also gets cut at two locations around the Lochinvar Creek crossing (southwest of Windella) in events as frequently as the 10% AEP.[24] We recommend considering investigating upgrades to the wider road infrastructure, in consultation with the Reconstruction Authority, who have responsibilities under the State Disaster Mitigation Plan.

In planning for a stronger more resilient community in the Hunter River catchment, it is the preference of NSW SES that infrastructure including roads should be in place prior to development occurring in locations which otherwise become isolated by flooding.

NSW SES Historical Information

As the residential population in this area is currently minimal, minimal issues have been reported. However, in nearby residential areas where the roads become cut, there have been several incidents where people have driven into floodwater and required rescue. Further, in nearby communities that become isolated, there has been the need for NSW SES to provide medical and food resupply, and shuttle critical workers across the floodwaters where time and resources permitted. NSW SES has responded to a number of requests related to flooding along Anambah Road and sandbagging requests for property protection in Windella.

Changes to Flood Behaviour

It is noted that some localised increases in flood levels up to 550mm are expected at a number of offsite locations [25] due to proposed earthworks and fill. We recommend seeking advice

[17] Northrop. 2024. Flood Impact and Risk Assessment, Figure 8
[18] WMA Water. 2010. Hunter River Branxton to Green Rocks Flood Study, Figure 27
[19] WMA Water. 2010. Hunter River Branxton to Green Rocks Flood Study, Figure 41
[20] WMA Water. 2010. Hunter River Branxton to Green Rocks Flood Study, Figure 26a
[21] Barr Planning. 2024. Statement of Environmental Effects – Concept DA, Stage 1 DA, page 19
[22] Northrop. 2024. Flood Impact and Risk Assessment, page 8
[23] Northrop. 2024. Flood Impact and Risk Assessment, Figure BC6-3
[24] WMA Water. 2016. Lochinvar Flood Study
[25] Northrop. 2024. Flood Impact and Risk Assessment, Figure D6

from the Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour for adjacent and downstream areas, particularly as fill is being proposed.

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

In a complex environment impacted by both flash flooding from local creek and high hazard flooding from the Hunter River,[26] the community's ability to respond to a flood event in a timely and efficient manner may be complicated by these factors. **Evacuation must not require people to drive or walk through flood water.** 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. Therefore, we recommend infrastructure to support the community, including River Road, is established prior to the development of the site itself.

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

Managing risks associated with High Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Current evidence suggests that flood events will become more frequent due to climate change. A Climate Change Calculator has been developed to address the updated ARR climate change guidelines (Wasko et al, 2024), recommending the adjustment of the BoM 2016 IFDs to account for the warming that has occurred since the mid-point of the data used for their development (1961-1990). This results in a significant increase in existing conditions flood levels.[27]

The change in flood probabilities with climate change for the Hunter River catchment results in the new probability of the 1 in 100 AEP to be approximately 1 in 65 AEP event for the current 2024 scenario, becoming even more frequent in the future.[28] For the proposed development

[26] WMA Water. 2010. Hunter River Branxton to Green Rocks Flood Study, Figure 49 & 51
[27] Babister et al. 2024. Climate Change Calculator: Estimating Changes to Flood Probability Under Different Climate Change Scenarios, page 1
[28] WMAwater. 2024. Climate Change Calculator. Retrieved 18/10/24 from https://ccc.wmawater.com.au/

site, this could result in more frequent isolation than what is currently expected based on previous modelling.

Principle 5 Risks faced by the itinerant population need to be managed.

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

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner. The Bureau of Meteorology provides flood warning for Hunter River flooding in this area, with about 12 hours warning lead time before flood levels reach 5.9 metres at the Belmore Bridge gauge.[29]

However, it should be noted that in flash flood environments (such as the local creek catchment area) there is little to no warning time and, consequently, there is little opportunity for the community to respond to a flood threat in an appropriate and timely manner. For flash flooding environments, the most suitable form of advice about the potential for flood producing storms and rainfall would be Severe Weather and Storm Warnings.

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

Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response operations.

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) for the life-span of the development. However, it is important to note that 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.

[29] Bureau of Meteorology, 2024. Service Level Specification for Flood Forecasting and Warning Services for NSW and the ACT – Version 3.15, page 20

Our Ref: ID 3159
Your Ref: DA/2024/763

27 June 2025

Emmilia Marshall
Maitland City Council
PO Box 220
Maitland NSW 2320
Via email

email: Emmilia.Marshall@maitland.nsw.gov.au; shakira.muldoon@maitland.nsw.gov.au
CC: lisa.ignatavicius1@ses.nsw.gov.au

Dear Maitland Council team,

Development Application for 559 Anambah Road Gosforth

Thank you for the opportunity to provide comment on the Development Application for 559 Anambah Road Gosforth. It is understood that:

- The site was the subject of a Planning Proposal which resulted in the rezoning of RU2 Rural Landscape land to predominantly R1 General Residential in December 2020 under Maitland Local Environmental Plan 2011 (Amendment No. 26).
- The DA seeks approval to create a new urban subdivision within the Anambah Urban Release Area, consisting of approximately 900 low and medium density residential Lots, open space, roads, pedestrian networks, utilities and services, intersection upgrades and drainage infrastructure.
- The application also includes Stage 1 of the development, being the construction of 220 residential Lots (revised from 241)[1] and associated works including road access via Anambah Road and construction of River Road for emergency access during floods.

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*. Applying sound land use planning and flood risk management by considering the broader development context and infrastructure is essential in planning for a resilient community in the Hunter River catchment.

[1] Barr Planning. 2025. Response to Request for Additional Information, page 1

We refer to our previous advice letter dated 04 November 2024, with reference ID2702. As outlined in our previous advice, the site is a **High Flood Island**, with all proposed dwelling Lots located on land above the Probable Maximum Flood (PMF) event for both riverine and local catchment flooding[2].

In summary, we **support** the introduction of an access and egress route to reduce the frequency and duration of isolation of the proposed community. However, we **recommend:**

- Considering increasing the flood resilience of the proposed roads and road upgrades, including River Road and the broader road network. This should include accommodation for climate change impacts.
- The proposed access via River Road remains publicly accessible and that is maintained to an appropriate standard for use in wet weather. Further, the road should avoid any potential obstacles to emergency evacuation, such as locked gates, as this could cause delays and put people in danger. This is particularly important considering the flash flooding nature of local catchment flooding, providing little warning time.
- Flood resilient infrastructure, including roads, are in place prior to development occurring to avoid placing a large number of people at risk of frequent and potentially long duration isolation. This should consider the cumulative development in the area.

The existing access and egress routes

The site is currently **isolated** by both Hunter River and local catchment flooding. Flooding of the Hunter River impacts Anambah Road, the primary access route, at multiple locations south of the site in events as frequent as 20% AEP, and not infrequent occurrences such as the 1% AEP events as stated in the Urban Design Report.[3] In a 20% AEP event, flooding in Gosforth would have significant flood depths (between 5 and 10 metres)[4] and isolation could extend to over 50 hours in extreme events.[5] In the most recent event of May 2025, NSW SES issued evacuation and isolation warnings for this area, noting that Anambah Road was isolated for up to 72 hours. We therefore disagree with the description of Anambah Road flooding from Hunter River events as *infrequent and brief interruptions*[6] or (of) *low frequency and short duration*[7].

Egress routes may also be cut by localised flooding before the onset of Hunter River flooding, which could impede or delay evacuation. In relation to isolation caused by local flooding, we note the proposed intersection upgrades, Anambah Road (at the north and south culvert crossings E01/E02)[8] would have flood immunity up to the 10% AEP local catchment events[9] and therefore could get isolated in events of greater magnitude.

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[2] Northrop. 2025. Flood Impact and Risk Assessment – Revision B, Figure BC6-1

[3] Taylor Brammer Landscape Architects. 2025. Anambah Urban Design Report, page 18

[4] WMA Water. 2010. Hunter River Branxton to Green Rocks Flood Study, Figure 41

[5] Ibid., Figure 26a

[6] Barr Planning. 2025. Response to Request for Additional Information, page 21

[7] Ibid., page 22

[8] Northrop. 2024. Flood Impact and Risk Assessment, Figure 4

[9] Ibid., page 24

We emphasise that the risk of prolonged isolation from floodwaters of significant depths, such as that of Hunter River flooding, compounded by the local catchment flash flooding creates a complex environment which affects the community's ability to respond to a flood event in a timely and efficient manner. There is no known safe period of isolation, however prolonged isolation is more likely to require the intervention of emergency services for rescue, resupply and medical evacuation operations, increasing demand and pressure on emergency services resources. This will be at a time when resources are in abnormally high demand.

The proposed alternate access and egress route

Emergency access and egress to and from the site is expected to be available via the **proposed River Road link with a flood immunity up to a 1% AEP**[10]**.** This is proposed to be located on Council on owned land to Windella Estate and further to New England Highway when Anambah Road is compromised by local catchment flood events or/and Hunter River flooding.[11] [12] Flooding at the 1% AEP level would cut the New England Highway both east and west of the site,[13] further noting that the New England Highway gets cut at two locations around the Lochinvar Creek crossing (southwest of Windella) in events as frequently as the 10% AEP.[14] While we support the introduction of the proposed River Road as a higher level flood access route, we also recommend increasing the flood resilience of River Road and the broader access/egress roads to accommodate for climate change impacts wherever possible and ensuring the proposed road remains publicly accessible and appropriate for use during wet weather.

Consideration of cumulative impacts of development on access/egress routes

We note an analysis of the River Road and New England Highway intersection was conducted and indicates that the intersection fails before any traffic from the Anambah Urban Release Area (URA) is added to the intersection and that the priority intersection allows for up to 249 Lots from Anambah before failure[15]. We recommend considering cumulative impacts of this development (total 900 Lots, and not only limited to Stage 1) on evacuation, ensuring that the existing community is still able to effectively respond (including self-evacuating) within the available timeframe. 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.

Please feel free to contact our team 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.

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[10] Ibid., page 8 & 27

[11] Northrop. 2025. Flood Impact and Risk Assessment – Revision B, page 27

[12] SCT Consulting. 2025. Request for Additional Information DA/2024/763 – Concept Development Application for Two (2) into Nine Hundred (900) Lot Staged Torrens Title Subdivision, and Stage 1 Torrens Title Subdivision of Two Hundred and Twenty 177/874171, 55/874170 559 Anambah Road GOSFORTH NSW 2320, page 2 & Appendix A

[13] Ibid.

[14] WMA Water. 2016. Lochinvar Flood Study

[15] Barr Planning. 2025. Response to Request for Additional Information, page 9

Yours sincerely,

Peter Cinque
Senior Manager, Emergency Risk Management
NSW State Emergency Service

Emmilia Marshall

From: Jason McIntosh <jason@varaconsulting.com.au>
Sent: Tuesday, 29 July 2025 5:11 PM
To: NSW SES Risk Reduction
Cc: Lisa Ignatavicius; Emmilia Marshall; Shakira Muldoon; Brian Swaine; Robert Huxley; Florian Caillon; Steve Barr (sbarr@barrpandp.com.au); Samuel Liu
Subject: RE: RESPONSE TO SES COMMENTARY – DA/2024/763 – 559 ANAMBAH ROAD, GOSFORTH (Your Ref: ID2702 & ID3159)

Dear Ana,

Thank you again for your detailed response and ongoing engagement.

We wish to clearly clarify a critical point regarding the function of River Road within our proposal for 559 Anambah Road.

River Road is not being proposed as an "emergency access" or "evacuation route". These terms are not appropriate in the context of our application and may lead to misunderstanding. The proposed use of River Road is simply to enable safe and practical day-to-day movement for existing and future residents during flood events, when Anambah Road is inundated and cut off. This ensures people can continue their normal lives during such events—accessing work, school, medical care, etc.

Importantly, River Road will also provide reliable access for emergency service providers ***to*** residents in the area (including the existing Gosforth community) who may otherwise be isolated during a flood. It is not intended as a conduit for evacuation, nor is it promoted as part of any formal evacuation strategy. The flood constraints on the subject site simply do not warrant the need for evacuation, even in the most severe Hunter River or local catchment flood events.

We appreciate SES's constructive role in this process and remain available to collaborate further on the design and communication of the access strategy to ensure alignment with broader flood resilience objectives.

Thanks,

JASON MCINTOSH | 0417 689 270
Suite 9a, 172-178 Pacific Highway
Swansea NSW 2281
jason@varaconsulting.com.au

VARA
CONSULTING

From: NSW SES Risk Reduction <rra@ses.nsw.gov.au>
Sent: Tuesday, 29 July 2025 2:46 PM
To: Jason McIntosh <jason@varaconsulting.com.au>
Cc: Lisa Ignatavicius <lisa.ignatavicius1@ses.nsw.gov.au>; Emmilia Marshall <emmilia.marshall@maitland.nsw.gov.au>; Shakira Muldoon <shakira.muldoon@maitland.nsw.gov.au>; Brian Swaine <brian@thirdigroup.com.au>; Robert Huxley <robert@thirdigroup.com.au>; Florian Caillon <florian@thirdigroup.com.au>; Steve Barr (sbarr@barrpandp.com.au) <sbarr@barrpandp.com.au>; Samuel Liu <sliu@barrplanning.com.au>; NSW SES Risk Reduction <rra@ses.nsw.gov.au>

Subject: RE: RESPONSE TO SES COMMENTARY – DA/2024/763 – 559 ANAMBAH ROAD, GOSFORTH (Your Ref: ID2702 & ID3159)

Dear Jason,

Good afternoon and thank you for your email.

We appreciate you clarifying the proposed access strategy for the development proposal at 559 Anambah Road.

I just wanted to clarify that while the NSW SES support the alternate access, for the safety of the community we do not support this access being restricted/conditioned by any factors that may impede/delay evacuation during a flood event. This can become particularly dangerous in a flash flooding environment such as the local catchment, providing very limited warning time for the community to take protective action. Restricted/controlled access could potentially introduce another vulnerable link in the evacuation process and, as touched on in our previous email, can become problematic in large scale flooding events when emergency services resources are already in high demand. That's why, from an emergency management perspective, the NSW SES support that the proposed access via River Road remains publicly accessible and that is maintained to an appropriate standard for use in wet weather to support existing and future communities.

We also recommend careful consideration of cumulative impacts of future development on evacuation capacity for the broader Anambah Urban Release Area (AURA), and strongly advise working with Council as the consent authority to consider the evacuation capability for future development in the broader context ensuring it can provide for safe evacuation of future communities, while maintaining that of existing communities.

I hope this helps.

Warm regards,

Ana Maria Chitu
Planning and Research Officer | Emergency Risk Assessment

NSW STATE EMERGENCY SERVICE

E rra@ses.nsw.gov.au
Suite 5, Level 9, 1 Rider Boulevard,
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Rhodes NSW 2138
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From: Jason McIntosh <jason@varaconsulting.com.au>
Sent: Tuesday, 29 July 2025 11:14 AM
To: NSW SES Risk Reduction <rra@ses.nsw.gov.au>
Cc: Lisa Ignatavicius <lisa.ignatavicius1@ses.nsw.gov.au>; Emmilia Marshall <emmilia.marshall@maitland.nsw.gov.au>; Brian Swaine <brian@thirdigroup.com.au>; Robert Huxley <robert@thirdigroup.com.au>; Florian Caillon <florian@thirdigroup.com.au>; Steve Barr (sbarr@barrpandp.com.au) <sbarr@barrpandp.com.au>; Samuel Liu <sliu@barrplanning.com.au>
Subject: RE: RESPONSE TO SES COMMENTARY – DA/2024/763 – 559 ANAMBAH ROAD, GOSFORTH (Your Ref: ID2702 & ID3159)

Dear Ana Maria,

Thank you for your considered response and for acknowledging our approach to flood access and the function of River Road as part of the broader Anambah Urban Release Area (AURA) access strategy.

We are pleased that SES supports River Road as a valuable alternate flood access route, and we agree with the benefit to the broader community.

To clarify two key aspects of the proposed strategy for 559 Anambah Road:

1. Interim Use of River Road
River Road is described as a "interim" flood access solution only in the context that it may be superseded by the Western Link Road (Windella Road), if and when it is delivered. Should the Western Link Road not proceed within a reasonable timeframe - or at all - River Road remains available in perpetuity. In that sense, it is a fully viable long-term flood access solution unless and until it is replaced by the Western Link Road.

2. Purpose of Controlled Access
The controlled access arrangement for River Road is not intended to restrict use by emergency services in any way. Rather, it is a deliberate and measured response to ongoing community concerns from existing Windella Estate residents about the permanent opening of River Road to general traffic. These controls aim to manage day-to-day vehicle movement while ensuring that alternate access remains unfettered during flood events. We note SES's advice regarding the potential operational challenges of restricted access during large-scale flood events. To address this, the access control system will be designed with SES-compatible solutions (e.g., automated gates with remote override, signage, and a clearly defined Emergency Access Management Plan), to ensure reliability and ease of use by emergency services. We are happy to engage further with SES to ensure the final design aligns with emergency services management requirements.

In relation to SES' comment regarding consent conditions, we also wish to provide further context around the Western Link Road. While it is identified in the strategic access framework for the AURA, Council is currently leading the design and approvals process for that road in collaboration with another landowner. This work has occurred independently of Thirdi, who has not been involved in the planning or funding discussions to date, nor has Council sought Thirdi's input. As such, and critically, our application for 559 Anambah Road does not rely on the delivery of the Western Link Road to proceed. Our access strategy is fully functional based on existing road infrastructure, with River Road forming the basis for alternate flood access.

We appreciate the collaborative approach taken by NSW SES in reviewing this proposal, and we remain available to further discuss the details of the Emergency Access Management Plan or broader development access strategy as required.

Thanks,

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jason@varaconsulting.com.au

VARA
CONSULTING

From: NSW SES Risk Reduction <rra@ses.nsw.gov.au>
Sent: Monday, 28 July 2025 1:10 PM
To: Jason McIntosh <jason@varaconsulting.com.au>
Cc: Lisa Ignatavicius <lisa.ignatavicius1@ses.nsw.gov.au>; Emmilia Marshall

<emmilia.marshall@maitland.nsw.gov.au>; Brian Swaine <brian@thirdigroup.com.au>; Robert Huxley <robert@thirdigroup.com.au>; Florian Caillon <florian@thirdigroup.com.au>; Steve Barr (sbarr@barrpandp.com.au) <sbarr@barrpandp.com.au>; Samuel Liu <sliu@barrplanning.com.au>; NSW SES Risk Reduction <rra@ses.nsw.gov.au>
Subject: RE: RESPONSE TO SES COMMENTARY – DA/2024/763 – 559 ANAMBAH ROAD, GOSFORTH (Your Ref: ID2702 & ID3159)

Dear Jason,

Thank you for reaching out and we appreciate your considered response to our advice letter, along with clarifying the function of River Road.

We note that the use of River Road is intended to be a temporary alternate access route engineered to provide improved flood resilience, and that consistent with Council's views for the Anambah Urban Release Area (AURA), the long-term access strategy is to deliver a western road link through to Windella Road and the New England Highway. However, understanding the flooding constraints in the broader area, any additional alternative emergency access route that can be used long-term (as opposed to a temporary basis) during a flooding event would benefit the community, particularly noting the potential for future expansion of the population within the AURA.

In this context, it is important to consider if the western road link is confirmed and funded, and the timeframe until completion of this road. We understand that the applicant for Anambah DA1 at 381 Anambah Road, Anambah is engaging *"in delivering the Wyndella Road upgrades and subsequent lead-in road (western road link) upfront. The western road link will be the main access point for the applicant's land holding. The applicant acknowledged that the development application would need to be conditioned to ensure the western road link is delivered prior to the issue of a subdivision certificate for the first allotment."* **(Ethos Urban, 2025, Statement of Environmental Effects, page 12)** We suggest a similar condition may be explored and put in place for this proposal at 559 Anambah Road to mitigate risk by having the appropriate infrastructure in place prior to development occurring.

It is understood that the aim of providing controlled access via River Road is to manage any negative traffic impacts to Windella Estate residents in non-flood periods. We note that SES-compatible lockboxes, remote access systems, or automated gates, supported by signage and a clear Emergency Access Management Plan, are being proposed to manage this. In relation to this approach, the NSW SES advise that generally locked gates/restricted access can add complexities for warnings, emergency response and evacuation and could cause delays; this becomes particularly problematic during flooding events of large scale when resource demands are already quite high, therefore this is a less desirable solution from an emergency management perspective.

Please don't hesitate to reach out should there be any questions.

Warm regards,

Ana Maria Chitu
Planning and Research Officer | Emergency Risk Assessment

NSW STATE EMERGENCY SERVICE

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From: Jason McIntosh <jason@varaconsulting.com.au>
Sent: Wednesday, 23 July 2025 5:09 PM
To: NSW SES Risk Reduction <rra@ses.nsw.gov.au>

Cc: Lisa Ignatavicius <lisa.ignatavicius1@ses.nsw.gov.au>; Emmilia Marshall <emmilia.marshall@maitland.nsw.gov.au>; Brian Swaine <brian@thirdigroup.com.au>; Robert Huxley <robert@thirdigroup.com.au>; Florian Caillon <florian@thirdigroup.com.au>; Steve Barr (sbarr@barrpandp.com.au) <sbarr@barrpandp.com.au>; Samuel Liu <sliu@barrplanning.com.au>
Subject: RESPONSE TO SES COMMENTARY – DA/2024/763 – 559 ANAMBAH ROAD, GOSFORTH (Your Ref: ID2702 & ID3159)

Att: Mr Peter Cinque

Dear Peter,

Please find attached response to correspondence received from NSW SES via Maitland City Council on the above project. Note I will also upload a copy of this to the Planning Portal.

Feel free to call me directly if you wish to discuss.

Thanks,

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