

Our Ref: ID 3144

Your Ref: PP-2024-1780 Ref-3706

27 June 2025

Sunehla Bala Hawkesbury City Council PO Box 146 Windsor NSW 2756

Via Planning Portal

email: sunehla.bala@hawkesbury.nsw.gov.au

CC: helen.slater@ses.nsw.gov.au

Dear Sunehla,

Planning Proposal for Redbank Expansion Area (Kemsley Park)

Thank you for the opportunity to provide comment on the Planning Proposal for Redbank Expansion Area (Kemsley Park), Arthur Phillip Drive, North Richmond. It is understood that the planning proposal seeks to deliver approximately 300 to 350 lots, in addition to the master planned Redbank development comprised of 1399 dwellings and the completed 80 bed aged care facility and 192 home retirement village.

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 consent authority will need to ensure that the planning proposal is considered against the relevant Section 9.1 Ministerial Directions, including 4.1 – Flooding and is consistent with the NSW 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.

We refer to our previous correspondence dated 22 November 2023 and 17 July 2024, and note the site is located above the Probable Maximum Flood (PMF) level for regional Hawkesbury Nepean flooding. NSW SES has reviewed the Redbank Expansion Area Flood and Bushfire Safety Evaluation, and other related documents as provided. We note and appreciate the extensive discussion of the indirect impacts of regional flooding on the development.



P (02) 4251 6111 F (02) 4251 6190

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We further note the additional information provided regarding local creek flooding from Redbank Creek at the northern site boundary, including that "most of the PMF will be confined to open space areas" and "As this is a greenfield urban development, it will be possible to subdivision layouts and building footprints so that no dwellings experience above floor flooding." 1

In summary, we again reiterate:

- that rising road access should be provided for all proposed dwellings on the site to avoid the risk of isolation including from local flooding. The Flood and Bushfire Safety Evaluation states "Local flooding is (only) likely to affect internal roads to the development and then only in the more extreme rainfall events and for less than one hour."2
- further flood information should be sought regarding time to overtopping and duration of inundation of these roads.

You may also find the following Guidelines 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 Kate Dawes via email at rra@ses.nsw.gov.au should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,

Peter Cinque

Senior Manager Emergency Risk Management

NSW State Emergency Service

 $^{^{\}rm 1}$ Water Technology, 2025, Redbank Expansion Area Flood and Bushfire Safety Evaluation, Section 3.6.2.1 Local Flooding, Page 20

² Water Technology, 2025, Redbank Expansion Area Flood and Bushfire Safety Evaluation, Section