

Our Ref: ID 2262
Your Ref: 14614

16 February 2024

Max Strassmeir
Wollondilly Shire Council
PO Box 21
Picton NSW 2571

email: council@wollondilly.nsw.gov.au
CC: amanda.pollock@ses.nsw.gov.au

Dear Max,

Planning Proposal for Appin (Part) Precinct No. 2

Thank you for the opportunity to provide comment on the Planning Proposal for Appin (Part 2). This is the second Planning Proposal, hence the Proposal's identification as the Appin (Part 2). It is understood that the planning proposal seeks to:

- Rezone 100.10 hectares of land (the Site) within the Greater Macarthur Growth Area (GMGA) Appin precinct;
 - Lot 32 DP 736923 110 Macquariedale Road, Appin
 - Lot 1 DP 1000355 90 Macquariedale Road, Appin
 - Lot 3 DP 804375 725 Wilton Road, Appin
 - Lot 1 DP 804375 525 Wilton Road, Appin
- Rezone the site from Rural Landscape to Urban Development and Environmental Conservation to permit housing, roads, and the environmental management of ecologically significant land.

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 Ministerial Section 9.1 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. Key considerations relating to emergency management are outlined in Attachment A.

In summary, we:

- **Note** that the flood extents are contained in the well-defined Elladale Creek and Ousedale Creek traversing the site and flooding within these creeks is well contained within the riparian corridors suggesting that the development of Appin (Part 2) Precinct will not be impacted during a major flooding event.
- **Recommend** a comprehensive assessment of evacuation capability for the Greater Macarthur Growth Area (GMGA) through a flood impact and risk assessment (see Flood impact and risk assessment FRM guideline LU01) undertaken on a strategic basis to support the Picton Part 2 proposal.
- **Recommend** that consideration should be given to the cumulative impacts of developments in Wollondilly LGA with regard to Emergency Services requirements, including future NSW SES Unit facilities which must be located above the PMF.
- **Support** the consideration of climate change in flood modelling using the best available science for climate risk assessments. The NSW SES encourages the sharing of this risk information, which will enable other organisations, such as NSW SES, to plan for extremes in climate events and sequences.
- **Recommend** that any fast-track planning process for Wollondilly Shire would still require consideration of flood risk for development located on flood prone land.
- **Recommend** considering proposed infrastructure to be located above the PMF, to minimise disruption to essential services and reduce secondary risks.

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 Gillian Webber 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
Manager Risk Assessment Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹

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, for example as identified in the Wollondilly Shire Local Flood Plan. Evacuation is the NSW SES' primary Emergency Management Strategy for development at risk of flooding.

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. The NSW SES recommend that strategic plans for the Greater Macarthur Growth Area (GMGA) are underpinned by robust constraints analysis and mapping (considering flood, bushfire, ecological communities, etc.) undertaken by relevant experts to identify the suitability of different lands for different uses and thereby ensuring that appropriate statutory controls are in place to protect the community and the environment from adverse impacts such as flooding, including the Flood Risk Management Process.

Based on the available information in the Wollondilly Shire Flood Study (Broad Scale Assessment) 2021² as well as the Wollondilly Shire Council (WSC) interactive online mapping system (IntraMaps) the subject site appears to be predominantly above the probable maximum flood (PMF) with the exception of well-defined creeks. We note that the catchments are generally characterised as small (<40 ha), and consequently, flood risks will be managed by providing a conventional major /minor street drainage system³⁴.

The Wollondilly Shire Local Government Area currently has detailed Floodplain Risk Management Studies for Picton (2020) and Nepean River (2015). We recommend that further information regarding the isolation risk due to road closures, including time to onset, duration, frequency and hazard of floodwater isolating the proposed area should accompany the Planning Proposal.

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

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development. The existing road network is broadly spaced

¹ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

² Advisian (2021) - Wollondilly Shire Flood Study – Broad Scale Assessment

³ Wyndham Prince (2023) - Water Cycle Management Strategy Report Walker Corporation Appin (Part 2) Precinct pg 19

⁴ Walker (2023) – Appin (Part 2) Precinct Planning Proposal pg67

and rural in nature, and existing intersections are priority-controlled⁵. The Appin and North Appin Precincts are predominately bound by waterways, with Murrumbidgee Creek to the north, Georges River to the east, Nepean River to the west and Cataract River to the south.

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. 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.

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.

It is important to note that there is no formal flood warning system available for the proposed area, which may be subject to flash flooding. Therefore, there are significant challenges associated with flood planning, warning, evacuation, and response timing for any future development. Local flooding has the potential to displace individuals, disrupt essential services and cause isolations.

⁵ Walker (2023) – Appin (Part 2) Precinct Planning Proposal pg32