Our Ref: ID 3843
Your Ref: SSD-99909708

17 June 2026

Angela Berryman
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: angela.berryman@dpie.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Angela,

**State Significant Development Application for Affordable Housing Block 20A Edmondson Park Environmental Impact Statement**

Thank you for the opportunity to provide advice on the Environmental Impact Statement for the proposed development for 20A Buchan Avenue, Edmondson Park. It is understood that the proposed development seeks to construct an affordable housing development including:

- One level of basement and an at-grade, ground floor centralised parking area.
- 172 infill affordable dwellings across three buildings, of which 100% will be designated affordable rental housing.
- Communal open space centrally located on the second-floor level.
- Two generously sized ground flood lobbies within the lobby to Building A designed to cater for co-working arrangements, inclusive of a small office for the community housing provider.
- One small retail tenancy on the ground floor at the corner of Buchan Avenue and new MacDonald Road.
- The provision of a public site through link and area of open space along the north-eastern side of the development.
- Construction of the future laneway at the rear to service the proposed development.

We have reviewed the following documents provided as part of the preparation of our advice.

- Savills, 2026, Environmental Impact Statement
- GRC Hydro, 2026, Flood Assessment Report

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.

We note the proposal has considered flooding issues 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 circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including 4.1 Flooding and PS26-001.

While the site is "*located within the Maxwell Creek catchment, on the eastern bank of the creek*"[1] the development footprint is located above the PMF extent for creek flooding.[2] The site is minorly affected by overland flooding, reaching up to 0.2 metres in isolated areas during both the 1% AEP and PMF events.[3]

**In summary**, we:

- Recommend pursuing **site design and stormwater management that reduces the impact of flooding and minimises any risk to the community**. Any improvements that can be made to reduce flood risk will benefit the community.
- Highlight the **opportunity to address flooding constraints through a precinct-wide strategic approach**, by considering the most appropriate uses for flood affected areas to mitigate risk to life and property, that will result in a more resilient community, able to adapt to climate change impacts into the future.

You may also find the following Guidelines 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**

[1] GRC Hydro, 2026, Flood Assessment Report, Section 2. Introduction, Page 1
[2] GRC Hydro, 2026, Flood Assessment Report, Image 1: PMF Flood Extent and Velocity (Bewsher, 2011) with Architectural Plan Overlay, Page 3
[3] GRC Hydro, 2026, Flood Assessment Report, Figure 1 1%AEP and PMF Flood Depths, Page 8

## ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[4]

**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 strategies identified in the NSW State Flood Plan[5] and the Liverpool City Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.[6]

**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.

Further, risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. Climate change should also be considered.

While the site is "*located within the Maxwell Creek catchment, on the eastern bank of the creek*"[7] the development footprint is located above the PMF extent for creek flooding.[8] The site is minorly affected by overland flooding, reaching up to 0.2 metres in isolated areas during both the 1% AEP and PMF events.[9] As the site is currently undeveloped this is expected to be "*managed through standard stormwater design without presenting a design-critical flooding constraint*."[10] We recommend pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community.

It is also noted the site may lose access to the north during events larger than the 1% AEP event as a result of roads becoming inundated,[11] however the development appears to have flood free access to the south, including to Edmondson Square Town Centre and the wider road network.

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[4] NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline
[5] NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34
[6] NSW SES, Liverpool City Flood Emergency Sub Plan, Endorsed April 2023, Section 5.8
[7] GRC Hydro, 2026, Flood Assessment Report, Section 2. Introduction, Page 1
[8] GRC Hydro, 2026, Flood Assessment Report, Image 1: PMF Flood Extent and Velocity (Bewsher, 2011) with Architectural Plan Overlay, Page 3
[9] GRC Hydro, 2026, Flood Assessment Report, Figure 1 1%AEP and PMF Flood Depths, Page 8
[10] GRC Hydro, 2026, Flood Assessment Report, Section 7 Conclusion, Page 6
[11] Bewsher Consulting, 2004, Cabramatta Creek Floodplain Management Study and Plan

**Principle 3 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.

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. 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.

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

Managing flood risks associated with Indirectly Affected Communities 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.

**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 a development.

**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.

NSW SES utilises the Australian Warning System which is a nationally consistent, three-tiered approach to issue clear warnings and lead people to take action ahead of severe weather events. The three warning tiers consist of Advice, Watch and Act and Emergency Warning. These warnings can be viewed on the SES website and the HazardWatch website and app.

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

Development within a floodplain will necessitate ongoing involvement from the NSW SES in community awareness, preparedness, and response activities. It is essential that all site users, both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life. This includes:

- Raising awareness of flood risk
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Importantly, a private flood management plan is insufficient to address flood risk on this site.

Residents and users of the proposed development should be made aware of their flood risk and be encouraged to use available tools and resources, including:

- **Hazards Near Me app** – part of the Australian Warning System, providing timely flood warnings
- **NSW SES website** – offering comprehensive guidance on flood preparedness, response, and recovery, including multilingual resources
- **HazardWatch** – an interactive platform for accessing real-time flood information and warnings