Our Ref: ID 3969
Your Ref: SSD-113872990

3 August 2026

Victor Casasanta
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

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CC: shelly.stingmore@one.ses.nsw.gov.au

Via Major Portal

Dear Victor,

State Significant Development Application for Residential Flat Building with in-fill affordable housing 35-39 Darley Street East, Mona Vale (EIS)

Thank you for the opportunity to provide advice on the Environmental Impact Statement (EIS) for a proposed residential flat building with in-fill affordable housing located at 35-39 Darley Street East, Mona Vale. It is understood that the site currently has 18 apartments and a swimming pool, and the proposed development seeks consent for:

- demolition of all buildings and associated structures, tree removal and site clearing
- construction of an eight (8) storey residential flat building with in-fill affordable housing, with 53 residential apartments, and Communal open space for all residential apartments is proposed at the ground floor
- three (3) levels of basement carparking with 124 car parking spaces (including 18 visitor spaces and 14 accessible spaces) and associated landscaping.

Vehicle access to the basement parking levels is provided off Darley Street East which will also allow access for the proposed waste collection and loading.

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

- Planning Ingenuity, July 2026, Environmental Impact Statement
- SGC, 2026, Stormwater Letter, 20250242-L02 Flood Statement

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

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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 the Ministerial Local Planning Directions 4.1 Flooding or the Local Plan Making Direction P5.7 – Flooding (for proposals lodged from 1 July 2026 onwards), and Planning Circular PS 26-001 Flooding and land use planning.

The site begins to be affected by shallow flooding in a 1% Annual Exceedance Probability (AEP) event to flood depths of around 0.3m, on the western boundary fence line then as water flood levels rise extends to south-western boundary fence during a Probable Maximum Flood (PMF)[1] with depths of up to 0.5m and flood hazard H1-H2.[2]

As the site is affected by flash flooding there are no Bureau of Meteorology quantitative flood warnings available. Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall.

In summary, we do not have significant concerns with the proposal, however recommend considering placing **all openings to the basement (ramp, vents, etc) above the Probable Maximum Flood (PMF) or 1% AEP plus freeboard**, whichever is higher as a condition of consent. If this is not feasible reconsider basement carparking as any openings to the basement below the PMF will pose risk to life and property.

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 Daniela Mitreski 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

[1] Haskonning Australia. 2017. McCarrs Creek, Mona Vale and Bayview Flood Study Review
[2] SGC, 2026, Stormwater Letter, 20250242-L02 Flood Statement

Senior Manager, Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[3]

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 [4] and the Northern Beaches Flood Emergency Sub Plan[5], where evacuation is the preferred 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.

The site begins to be affected by a 1% AEP event to flood depths above ground level of 0.34m, on the western boundary fence line then as water flood levels rise extends to south-western boundary fence during a PMF[6] with depths of up to 0.5m and flood hazard H1-H2.[7] The site is on a High Trapped Perimeter and may become isolated during events as frequent as a 20% AEP event due to inundation on Darley Street East, Barrenjoey Road, Surfview Road and Bassett Street East.

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.

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

Managing flood risks requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

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[3] NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline
[4] NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34
[5] NSW SES. 2021. Northern Beaches Flood Emergency Sub Plan
[6] Haskonning Australia. 2017. McCarrs Creek, Mona Vale and Bayview Flood Study Review
[7] SGC, 2026, Stormwater Letter, 20250242-L02 Flood Statement

- 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.

We recommend ensuring that all openings to the basement (ramp, vents, etc) are situated above the PMF or 1% AEP plus freeboard, whichever is higher as a condition of consent. If this is not feasible reconsider basement carparking as any openings to the basement below the PMF will pose risk to life and property.

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.

As the site is affected by flash flooding there are no Bureau of Meteorology quantitative flood warnings available. Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall.

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