

Our Ref: ID 2099
Your Ref: SSD-45024776

18 September 2023

Judith Elijah
Department of Planning & Environment
Locked Bag 5022
Parramatta NSW 2124

email: judith.elijah@dpie.nsw.gov.au

Dear Judith,

State Significant Development Application for Narwee Parklands Seniors Housing

Thank you for the opportunity to provide comment on the Response to Submissions (RtS) Report for Narwee Parklands Community Care SSD-45024776 dated 29 August 2023. It is understood that the proposed development seeks consent for the demolition of all structures, site preparation works and construction of a new 3 storey Residential Care Facility (RCF) comprising 163 beds, communal facilities, basement car parking, signage and associated landscaping works at 59-67 Karne Street North, Narwee (the site).

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 refer to our previous correspondence dated 9 March 2023, and note that our advice has been incorporated into the RtS. In summary, it appears the proposed development will be isolated by flooding above the 1% AEP, but not inundated by flooding up to the PMF after the establishment of the flood protection wall¹. We recommend consulting with the Department of Planning and Environment, Environment and Heritage Group regarding the flood protection wall and its impacts on flooding, including the potential for wall collapse in the event of lack of maintenance or other circumstance. A Flood Risk Management Plan and Emergency Response Plan has been prepared for the site, noting that the risk is not inundation, rather access and egress concerns. The plan must be updated, exercised and reviewed regularly to ensure awareness for relevant personnel and to ensure it remains consistent with best practice and existing emergency management arrangements. This is consistent 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](#)

¹ TTW (2023) - Flood Impact Assessment Section 7 page 33

[Emergency Management Planning](#). The floodplain risk management issues in the Manual which are of concern to the NSW SES are further articulated for completeness in Attachment A.

Please feel free to contact Claire Flashman 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 Guideline²

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

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

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 impact of the cumulative development on evacuation has not been demonstrated in the existing documents provided, however given the flash flood risk in the area and the lack of warning systems, this is unlikely to be an issue.

Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation.

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

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, which is the proposed population. Safe access and egress routes should be clearly communicated to staff, visitors, students and carers.

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

It is important to note that there is currently no formal flood warning system available for the proposed area, which is subject to flash flooding. Therefore, there are challenges associated with flood planning, warning, evacuation, and response timing for any future development. Even with a local warning system, the more specific the warning requirement for individuals and sites becomes, in this case a seniors housing community including 163 beds, the more difficult it is to deliver warnings in the short time frames that may apply. An effective strategy with clear and concise messaging understood by the community is key to providing an opportunity to respond to a flood threat in an appropriate and timely manner.

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

² NSW Government. (2023) Principles Outlined in the Support for Emergency Management Planning Guideline

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. This is unlikely for the proposed development.