

Our Ref: ID 3038
Your Ref: SSD-72700708

17 April 2025

Renah Givney
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: renah.givney@dpie.nsw.gov.au
CC: elena1.palamara@ses.nsw.gov.au

Dear Renah,

State Significant Development Application for 25-27 Boyd Street, Tweed Heads Affordable Housing

Thank you for the opportunity to provide comment on the State Significant Development Application for 25-27 Boyd Street, Tweed Heads Affordable Housing. It is understood that the proposal seeks to construct 13-storey residential flat building to be used for affordable housing comprising:

- 80 apartments;
- a ground level community room and bicycle storage area;
- landscaping; and
- two basement carparking levels for 66 vehicles

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 NSW SES recommends that consideration of flooding issues is undertaken 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 directions under the *Environmental Planning and Assessment Act, 1979*.

In summary, based on the currently available information we do not have significant concerns regarding the proposed development, however:

- Recommend considering the impact of flooding up to the probable maximum flood (PMF) in the assessment, as the current assessment only considers the risk up to 1% AEP.

- Recommend considering the impacts of climate change. It is estimated that the actual probability of a 1 in 100 AEP for this catchment area is approximately a 1 in 60 AEP event for the current 2025 scenario.¹ For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.

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 me 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,

A handwritten signature in black ink, appearing to read 'Elspeth O'Shannessy', written over a horizontal line.

Elspeth O'Shannessy
Manager Emergency Risk Assessment
NSW State Emergency Service

¹ WMAwater. 2025. Climate Change Calculator. Retrieved 14 April from <https://ccc.wmawater.com.au/>

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.

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan³ and the Tweed Shire Local Flood Plan⁴ 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.

NSW SES has responded to multiple flood related requests in this area relating to sandbagging requests for property protection in the area, however the available mapping identifies this area to be flooded in extreme events only (between the 1% AEP and PMF).⁵

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

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:

- 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.

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

³ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

⁴ NSW SES. 2023. Tweed Shire Local Flood Emergency Sub Plan

⁵ WMA Water. 2024. Tweed Valley Flood Study Update and Expansion

Current evidence suggests that flood events will become more frequent due to climate change. A Climate Change Calculator has been developed to address the updated ARR climate change guidelines⁶ recommending the adjustment of the BoM 2016 IFDs to account for the warming that has occurred since the mid-point of the data used for their development (1961-1990). This results in a significant increase in existing conditions flood levels.⁷

The change in flood probabilities with climate change for this catchment area results in the new probability of the 1 in 100 AEP to be approximately 1 in 60 AEP event for the current 2024 scenario, becoming even more frequent in the future.⁸ For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.

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.

It is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.

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

Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response requirements.

⁶ Wasko et al. 2024. A systematic review of climate change science relevant to Australian design flood estimation. *Hydrology and Earth System Sciences*. 28: 1251-1285

⁷ Babister et al. 2024. Climate Change Calculator: Estimating Changes to Flood Probability Under Different Climate Change Scenarios, page 1

⁸ WMAwater. 2025. Climate Change Calculator. Retrieved 14 April from <https://ccc.wmawater.com.au/>