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Department of Planning and Environment  
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Parramatta NSW 2124

Email: [DPE Major Planning Portal](#)  
cc: [judith.elijah@dpie.nsw.gov.au](mailto:judith.elijah@dpie.nsw.gov.au)

Dear Judith,

**Environmental Impact Assessment for Narwee Parklands Seniors Housing**

Thank you for the opportunity to provide comment on the Environmental Impact Assessment (EIS) for Narwee Parklands Seniors Housing at 59-67 Karne Street (Lots 2&3 of DP16063, Lot 2 of DP518877 and Lots C&D of DP403467) Narwee NSW, in Canterbury-Bankstown LGA. It is understood that the Environmental Impact Assessment is for the proposed development for construction of a residential care facility (RCF) development comprising of 7,039m<sup>2</sup> gross floor area, including:

- 165 beds within a single building three (3) storeys in height;
- Communal facilities including kitchens, dining rooms, lounge rooms and activity rooms on each level;
- 30 spaces of basement car parking and one at grade ambulance bay.

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 assessment 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 NSW Floodplain Development Manual, 2005 (the Manual). Attention is drawn to the following principles outlined in the Manual which are of importance to the NSW SES role as described above:

- Zoning should not enable development that will result in an increase in risk to life, health or property of people living on the floodplain.

- 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.
- 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.
- In the context of future development, self-evacuation of the community should be achievable in a manner which is consistent with the NSW SES's principles for evacuation.
- Future development must not conflict with the NSW SES's flood response and evacuation strategy for the existing community.
- Evacuation must not require people to drive or walk through flood water.
- Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation. 'Shelter in place' strategy is not an endorsed flood management strategy by the NSW SES for future development. Such an approach is only considered suitable to allow existing dwellings that are currently at risk to reduce their risk, without increasing the number of people subject to such risk. The flood evacuation constraints in an area should not be used as a reason to justify new development by requiring the new development to have a suitable refuge above the PMF. Allowing such development will increase the number of people exposed to the effects of flooding. Other secondary emergencies such as fires and medical emergencies may occur in buildings isolated by floodwater. 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.
- 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.
- NSW SES is opposed to development strategies that transfer residual risk, in terms of emergency response activities, to NSW SES and/or increase capability requirements of the NSW SES.

- Consent authorities should consider the cumulative impacts any development will have on risk to life and the existing and future community and emergency service resources in the future.


Evacuating residents without causing harm to very frail elderly residents can take many hours for even the smallest of facilities. NSW SES note in the Civil Integrated Water Management Plan provided for the Narwee Parklands Care Community that a stormwater system has been developed to intercept and discharge all upstream flows up to a PMF flood event. The preparation and planning to reduce the effects of extreme weather events on the functioning of the seniors housing development will protect residents and staff. Building resilient infrastructure, thus reducing the risk during times of emergency, also reduces reliance on emergency services.

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](mailto: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 that reads 'Gillian S. Webber'.

Gillian Webber  
Planning Coordinator, Emergency Risk Management  
**NSW State Emergency Service**