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Your Ref: SSD-95341456

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Via Major Portal

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CC: [helen.slater@ses.nsw.gov.au](mailto:helen.slater@ses.nsw.gov.au)

Dear Liam,

**Secretary's Environmental Assessment Requirements for Concord Avenue, Victoria Avenue  
and George Street, Concord West**

Thank you for the opportunity to provide advice on the Secretary's Environmental Assessment Requirements (SEAR's) for a concurrent State Significant Development Application (SSDA) and Rezoning Proposal relating to a new residential flat building development at 7 Concord Avenue, 202 George Street, and 69-73 Victoria Avenue, Concord West.

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 has reviewed the proposed development and the flood risk information available to the NSW SES. 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*. The floodplain risk management issues which are of concern to the NSW SES are detailed in Attachment A.

**In summary**, we **note** the site is subject to flooding in extreme events<sup>1</sup> and **recommend** undertaking a detailed Flood Impact and Risk Assessment<sup>2</sup> as identified in the Scoping Report<sup>3</sup> to understand the full extent of the flood risk to the proposed site up to and including the Probable Maximum Flood (PMF), including the impacts of climate change.

Please feel free to contact our team 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,



Peter Cinque  
Senior Manager Emergency Risk Management  
**NSW State Emergency Service**

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<sup>1</sup> WMA Water. 2019. Powells Creek Flood Study

<sup>2</sup> NSW Government. 2023. Flood Risk Management Guideline LU01: Flood Impact and Risk Assessment

<sup>3</sup> Beam Planning. 2025. HDA State Significant Development Scoping Report 7 Concord Avenue, Concord West Page 11

## **ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>4</sup>**

### **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<sup>5</sup> and The Bay Flood Emergency Sub Plan<sup>6</sup> 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 EIS should investigate the flood risk to the site and the impacts that the proposal may have on the flood behaviour for the full range of flooding, up to the Probable Maximum Flood (PMF) include climate change considerations.

### **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.

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 risks associated with flooding requires careful consideration of development type, likely users, and their ability respond to minimise their risks. The EIS should include consideration of:

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<sup>4</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>5</sup> NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

<sup>6</sup> NSW SES. 2021. The Bay Flood Emergency Sub Plan

- 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.**

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

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

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase. However, 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.