

Our Ref: ID 1521
Your Ref: IRF21/4659

15th December 2021

[REDACTED]
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150 via email:

[REDACTED]

Dear [REDACTED]

Exhibition of Draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review) and Amendment to State Environmental Planning Policy (State Significant Precincts) 2005

Thank you for the opportunity to provide comment on the Draft Sydney Olympic Park Master Plan 2030 (Interim Metro Review) and Amendment to State Environmental Planning Policy (State Significant Precincts) 2005.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunamis 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.

There have been a number of issues with road closures during storm events. Several locations within the Olympic precinct have been identified as sites for a Mass Care Facility for flood and other emergency events.

At this stage, the NSW SES is not able to provide a detailed assessment of the Sydney Olympic Park Master Plan as there is no flood study or floodplain risk management study covering the area of interest available. It is important that the Master Plan considers local flooding risks, including access and egress, given the emergency management arrangements outlined above. We would be interested in a meeting with SOPA to discuss these concerns.

Nevertheless, the consent authority will need to ensure that the proposal is considered against the relevant Ministerial Section 9.1 Directions, including 4.3 – Flood Prone Land 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 principals outlined in the Manual which are of importance to the NSW SES role as described above:

- ✦ Risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF).

- ✦ Zoning should not enable development that will result in an intolerable increase in risk to life, health or property of people living on the floodplain.
- ✦ 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.
- ✦ 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 soundland use planning and flood risk management.

You may also find the following Guidelines, originally developed for the Hawkesbury Nepean Valley and available on the NSW SES website useful:

1. [Reducing Vulnerability of Buildings to Flood Damage](#)
2. [Designing Safer Subdivisions](#)
3. [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact me via email [REDACTED].au should you wish to discuss any of the matters raised in this correspondence.

Yours sincerely,



Elspeth O'Shannessy
Planning Coordinator, Metro Zone
NSW State Emergency Service