

Our Ref: ID 1060  
Your Ref:

25 August 2021

Mr Andrew Watson  
DA Coordinator, Key Sites & Regional Assessments  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2150

Dear Mr Watson,

**Re: Planning Proposal – Penrith Lakes Employment Lands Subdivision  
and Works (DA 9876) 14-278 Old Castlereagh Road, Castlereagh**

I refer to your email dated 13 August 2021 consulting with the NSW State Emergency Service on the amended development application for 14-278 Old Castlereagh under clause 55 of the Environmental Planning and Assessment regulations.

The NSW State Emergency Service (NSW SES) is the lead agency responsible for dealing with floods, storms, and tsunami in NSW. This role includes planning for, responding to, and coordinating the initial community 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 documentation relating to the revised DA in particular the Flood Emergency Response Plan (FERP) prepared by Molino Stewart. The NSW SES position on a FERP being prepared as a condition for approval of a DA is contained in the Section N7 of the Floodplain Development Manual 2005.

However, the NSW SES does have serious concerns regarding the evacuation capacity for the proposed development and the Penrith Lakes precinct. During flood operations evacuation, primarily by vehicle, ahead of evacuation routes

being cut is the primary method of reducing risk to life in the Hawkesbury Nepean Valley. Shelter in place is not supported due to the depth and duration of flooding in the valley.

We note the FERP state the site is above the 1:100 AEP height plus 1 metre freeboard – as provided for in the SEPP (Penrith Lakes). However, the NSW SES plans for the full range of floods up to the Probable Maximum Flood (PMF). We also note the provision contained in Clause 33 of the SEPP (Penrith Lakes) which states:

*(3) Development consent must not be granted for development on land zoned Employment, Residential or Tourism unless the consent authority is satisfied that the development will not adversely affect the safe and effective evacuation of the land and the surrounding area.*

The evacuation routes out of the Penrith Lakes area includes Castlereagh Road to Andrews Road and Coreen Avenue to the Northern Road. These routes are also shared with the nearby Penrith North industrial area. The Northern Road regional evacuation route capacity is also shared between evacuation traffic from the Hawkesbury LGA and Penrith LGA. The proposed development will impact these evacuation routes.

We note the recent announcement of a large film studio and are aware of other developments that may be proposed for the Penrith Lakes area, all of which will use the same evacuation routes. The NSW SES considers it imperative the evacuation capacity for development in the Penrith Lakes area must consider the cumulative effect of current and future development.

NSW SES has been working with Infrastructure NSW, Transport for NSW and DPIE on flood evacuation modelling for a range of scenarios across the Hawkesbury Nepean Valley including the Penrith Lakes precinct. Preliminary results show there is insufficient evacuation capacity for the Penrith Lakes area considering future development in the precinct. This modelling work is not yet complete and will inform our advice to the Department and the Hawkesbury Nepean Flood Strategy.

One strategy that has been proposed is early evacuation from the Penrith Lakes area to reduce the interaction with the evacuation from Penrith North and the Richmond/ Windsor floodplain. This strategy is being explored by DPIE in conjunction with the NSW SES, Infrastructure NSW, and Transport for NSW. This work is not yet complete, and we are collectively working through the various complex issues.

The analysis of the evacuation issues presented in the FERP does not provide, in our view, sufficient comfort that allows the NSW SES to advise the Department that the development will not adversely affect the safe and effective evacuation of the land and the surrounding area. The cumulative impact of proposed and possible development and the results of the evacuation modelling project must be considered.

Should you wish to discuss any of the matters raised in this correspondence, please contact Peter Cinque on 0418 257 028 or via email at [peter.cinque@ses.nsw.gov.au](mailto:peter.cinque@ses.nsw.gov.au) (with CC to [nswses.riskreduction@ses.nsw.gov.au](mailto:nswses.riskreduction@ses.nsw.gov.au)).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nicole Hogan', is written above the printed name.

**Nicole Hogan**

Assistant Commissioner, Metro Operations  
**NSW State Emergency Service**