

31st January 2019

Ms Anne-Maree Carruthers
Department of Planning and Environment
GPO Box 39 Sydney NSW 2001
Via email: aerotropolis@planning.nsw.gov.au
Attention: [REDACTED]

Dear Ms Carruthers

Re: Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan

Thank you for providing the NSW State Emergency Service (NSW SES) the opportunity to provide a submission on the Draft Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan ('the Plan').

The NSW SES is the legislated agency responsible for ensuring safety to people and property before, during and after flood, storm and tsunami. It has an interest in the strategic management of land to ensure intolerable risks are avoided to future communities. From this position, the NSW SES provides the following comments on the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan.

NSW SES comments, concerns and recommendations in the review of the Plan.

The Plan states that

Planning for the Aerotropolis will embrace natural systems as valuable assets, rather than constraints (p 24).

However, in embracing natural systems as valuable assets, the NSW SES recommends that there still needs to be consideration of the risks that are created from a new community being exposed to the natural environment, especially where a new community is exposed to natural hazards such as flooding.

Where there is a greater understanding of the full range of hazards including rare but conceivable events (e.g. probable maximum flood), planning can better incorporate the risk into the land use planning strategy. For example, understanding the full range of risk could lead to the need to design a road system to enable safe and timely evacuation to ensure safety of a future community exposed to flood hazard.

The Plan also states that

'Clear criteria will be established so proposals to assess rezonings are dealt with quickly when it comes time to rezone the precincts' (p 25)

However, there should be consideration of not overriding the requirement to consult with government agencies such as the NSW SES and NSW Rural Fire Service, who have legislated responsibilities to ensure the safety of people and property before, during and after natural disasters.

The NSW SES considers that the Plan needs to embrace the considerations highlighted in the Western City District Plan. That is the Plan should have

Consideration of natural hazards and their cumulative impacts includes avoiding growth and development in areas exposed to natural hazards and limiting growth in existing communities that are exposed and vulnerable to natural hazards. (Western City District Plan, p 136)

Although the Plan is embracing South Creek and its natural environment, it should not overlook the potential for the flood risk to significantly increase as a result of increased development within proximity to a watercourse.

In this way, the Plan should embrace risk-based land use planning. Risk-based land use planning has the greatest potential to reduce future disaster risk on communities, avoid preventable deaths, and manage unrealistic resource demands on the emergency management sector.

To achieve consistency with the Greater Sydney Region Plan and the Western City District Plan, achieve disaster resilience and avoid increasing risk to the NSW community, the NSW SES provides three recommendations to DPE to consider in the finalisation of the Plan. The justification for these recommendations are within the addendum included with this submission.

The NSW SES recommends that:

1. DPE incorporate risk-based strategic land use planning that incorporates considerations of natural hazards, such as flood and storm to identify areas more suitable for development given the risks and to ensure the safety of future communities.
2. NSW SES be included in discussions and strategic land use planning on the future growth identified for the South Creek corridor and other proposed greenfield urban development areas.
3. The NSW SES has further and increased involvement at the strategic planning level, through involvement in development of the Interim Land Use and Infrastructure Implementation Plans. Regional Road Evacuation Master Plans should also be developed for key flood risk areas where necessary.

Thank you for the opportunity to comment on the Plan. Please contact Marcus Morgan on [REDACTED] if you wish to discuss any of the matters raised in this correspondence.

Yours sincerely,



Kaylene Jones
Director Planning and Preparedness

Addendum

The following supports the NSW SES's three recommendations for consideration in finalisation of the Plan.

1. Risk-based strategic land use planning supported by evidence that incorporates considerations of natural hazards, such as flood, storm and tsunami.

The risk-based approach to strategic planning that considers the full range of flood sizes (up to the PMF) as identified in the Draft Western City District Plan (p 123), is one that should consider the consequences to the existing and current communities and the emergency management agencies. The NSW SES brought this to the attention of the Greater Sydney Commission (GSC) for consideration in the review of the draft Western City District Plan.

A risk-based approach to land use planning that incorporates consideration of natural hazards should consider a range of risk situations including more probable but lower consequence events and less probable but greater consequence events. For example when assessing the risks from flooding, there should be consideration up to the probable maximum flood (PMF) for both riverine and flash flood (overland flow) events.

Where data is not available, or only available for model events up to the 1% Annual Exceedance Probability (AEP) flood, it should be necessary to assess the full range of flood risk up to the PMF when undertaking strategic land use plans and before plans are finalised.

The *Australian Business Roundtable for Disaster Resilience and Safer Communities*, in their report titled 'Building resilience to natural disasters in our states and territories (Deloitte Access Economics, 2017)', refers to the Queensland Office of the Chief Scientist that recommended 'community decision-making be better informed on acceptable flood risks and consider both the chance of a flood happening and its potential consequences. (p 32)' instead of defaulting to the 1% AEP flood without assessing the consequences of the various flood probabilities.

The impact of increased development on the ability of emergency services to ensure community safety in all floods, storms and tsunamis needs to be incorporated into strategic land use planning more effectively and not just when considering areas identified for urban renewal but also for local infill development and land release areas. In this regard, there needs to be a clear assessment of what a decision to increase development has on the ability for emergency services to undertake emergency response and whether there needs to be improved infrastructure to enable such a response. This will help guide planning to ensure the safety of new and existing communities.

2. NSW SES has further and increased involvement at the strategic planning level for the Western Sydney Aerotropolis and South Creek

Where there are constraints to growth from flood, storm or tsunami risk, where not already, the NSW SES and Office of Environment and Heritage floodplain management team needs to be involved at the strategic planning level.

a. Land Use and Infrastructure Implementation Plans and integrating land use and transport planning to consider emergency evacuation needs

The sustainability priorities in the 2017 draft West District Plans included a priority to *Integrate land use and transport planning to consider emergency evacuation needs* suggesting:

'Relevant planning authorities should coordinate with Transport for NSW and the State Emergency Service to consider land use and local road planning, so that it is integrated with emergency evacuation planning and takes into account the cumulative impact of growth on road evacuation capacity.'

How these matters have been taken into account is to be demonstrated in any relevant planning proposal (draft West District Plan, p 138).'

The plans also stated 'better integration of land use and road planning must account for the cumulative impact of growth on available flood evacuation road capacity and the complexity of flood emergency operations (draft West District Plan, p 141).'

However the subsequent draft and final West District Plan deleted the requirement to *integrate land use and transport planning to consider emergency evacuation needs*.

The approach taken in the Resilient Valley, Resilient Communities – Hawkesbury-Nepean Valley Flood Risk Management Strategy ('HN Flood Strategy') needs to be developed for key flood risk areas in Greater Sydney such as the South Creek corridor.

Outcome 3 of the HN Flood Strategy is to implement

'Strategic and integrated land use and road planning — including preparation of a *Regional Evacuation Road Master Plan* and a *Regional Land Use Planning Framework* to better manage flood risk in the Valley.'

The development of a *Regional Land Use Planning Framework and Regional Evacuation Road Master Plan* based on data and evidence, will ensure that future development is placed in the right locations to ensure safety of the community during floods and storms.

The development of a *Regional Evacuation Road Master Plan* that *identifies a coherent evacuation road network and suitable flood design standards* will enable any consequent increased costs to be factored early in a project proposal, business case reviews and design.

Investment in the strategic planning phase will save the Government money in the longer term through investment in prevention rather than relying on a costly response, rescue and recovery process to ensure the safety of the community.

3. Proposed South Creek corridor

The NSW SES has previously requested inclusions in discussions on the future growth identified for the South Creek corridor to ensure that the proposed greenfield urban development is guided to the locations most appropriate for the delivery of new homes having careful consideration of natural hazards such as floods and storms.

However, there has yet to be any formal or informal invitation from DPE in regards to including the NSW SES in strategic land use planning discussions.

Greenfield development should be guided by risk-based strategic land use planning that incorporates considerations of natural hazards, such as flood and storm.

The points raised in 1. above, regarding the consideration of flooding up to the probable maximum flood, including riverine and flash flooding (overland flow) and the emergency management implications of developing in flood prone locations, including assessing evacuation constraints, need to be addressed in strategic planning for the South Creek Corridor.

References:

1. Council of Australian Governments (February 2011), *National Strategy for Disaster Resilience*
<<https://www.ag.gov.au/EmergencyManagement/Documents/NationalStrategyforDisasterResilience.PDF>>.
2. Australian Business Roundtable for Disaster Resilience and Safer Communities (Deloitte Access Economics, 2017) *Building resilience to natural disasters in our states and territories*.
<http://australianbusinessroundtable.com.au/assets/documents/ABR_building-resilience-in-our-states-and-territories.pdf>.