

Our Ref: ID 1489  
Your Ref: 2021/740948

02 December 2021

Ms Felicity Shonk  
Northern Beaches Council

via email: [felicity.shonk@northernbeaches.nsw.gov.au](mailto:felicity.shonk@northernbeaches.nsw.gov.au)

Dear Ms Shonk,

**PLANNING PROPOSAL FOR 1294-1300 PITTWATER ROAD AND 2-4 ALBERT STREET  
NARRABEEN**

Thank you for the opportunity to provide comment on the Planning Proposal for 1294-1300 Pittwater Road and 2-4 Albert Street Narrabeen.

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 planning 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:

- 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 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.
- 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.

Due entirely to the need to meet priorities dictated by legislated responsibilities, the NSW SES is not able to assess any detailed development proposal or to work with developer's consultants in preparing any such proposal.

Please feel free to contact me 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.

Yours sincerely,



Nicholas Kuster  
Manager Emergency Planning  
**NSW State Emergency Service**