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Dear Prity,

### **Alterations to St Philip's Christian College Cessnock Campus**

Thank you for the opportunity to provide advice on the Alterations to St Philip's Christian College Cessnock Campus, at 10 Lomas Lane, Nulkaba. The proposed development includes road upgrades, construction of 7 new buildings and aquatic centre and alters 6 existing buildings for the use of up to 1700 students.

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.

We refer to our previous letter dated 15 August to bmt global, regarding the Flood Emergency Response Plan (FERP) and notes that our advice has been considered in the revised FERP (page 17 of the Response to Submissions and page 22 of the revised FERP).

The consent authority will need to ensure that the assessment 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 principles outlined in the Manual which are of importance to the NSW SES role as described above:

- **Development should not result in an increase in risk to life, health or property of people living on the floodplain.**

The site (and existing school location) is impacted by Black Creek flooding, with the main access point from Lomas Lane flooded in a 20% AEP flood event. Alternative access is available up to and including the 5% AEP flood event. The school is subsequently inundated in a PMF, with a large proportion being high hazard (H4 to

H5) flooding (Flood Impact Assessment). This is unsafe for people and vehicles and the children, staff and other school users and visitors must not be exposed to such flooding.

- **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.**

The Flood Impact Assessment has included events up to and including the PMF.

- **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.**

The FERP has considered this risk, with access cut as quickly as 3-4 hours. As a low flood island, this puts anyone on site during a significant flood at considerable risk. Re-emphasising the need to close the school prior to the onset of flooding, and prior to the commencement of the school day. This would be particularly challenging on “non-school days” where the proposed school amenities may be used, such as the aquatic centre.

- **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.** It should be highlighted that the school has historically been evacuated (e.g. in 2015). **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.**

The strategy to “shelter in place” has been removed from the revised FERP. We note that an emergency refuge has been proposed above the PMF as a contingency.

- **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.**

This may occur if evacuation does not occur prior to the onset of flooding.

- **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.**

NSE SES encourages schools to develop appropriate emergency plans, however in accordance with sections 3.6, A-5, L-5, L-6.9.6 and N-7 of the NSW Floodplain

Development Manual, 2005 (the Manual), 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. The NSW SES also does not have statutory authority to endorse or approve flood emergency response plans.

It is noted that the revised FERP involves early closure of the school, prior to the onset of flooding. This is the preferred emergency management strategy to adopted by schools at risk of flooding or isolation. Preferably this should be prior to the school day where possible and communicated to any potential students, visitors, carers and staff. It notes the trigger for evacuation to occur is the 20% AEP, giving the school 2 hours until the main access is lost but alternative access still available. We recommend the AEP trigger is converted to a relative level on the proposed gauge to reduce user error and/or confusion. It is noted that council supports the installation of the gauge. However, we must reinforce that gauges can go offline or become damaged in severe weather and flooding and must be installed and maintained appropriately, with a contingency plan in place.

- **NSW SES is opposed to development strategies that transfer residual risk, in terms of emergency response activities, to NSW SES and/or increase capability requirements of the NSW SES.**
- **Consent authorities should consider the cumulative impacts any development will have on risk to life and the existing and future community and emergency service resources in the future.**

You may also find the following Guidelines available on the NSW SES website useful:

- Reducing Vulnerability of Buildings to Flood Damage

Please feel free to contact Elspeth O'Shannessy 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  
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**NSW State Emergency Service**