Our Ref: ID 3618
Your Ref: SSD-85149458

10 February 2026

Patrick Nash
Department of Planning, Housing and Infrastructure
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Parramatta NSW 2124

email: patrick.nash@planning.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Patrick,

State Significant Development Application for EIS Leichhardt Oval Refurbishment
SSD-85149458

Thank you for the opportunity to provide advice on the State Significant Development Application for Leichhardt Oval Refurbishment. It is understood that the proposed development seeks to refurbish the existing Leichhardt Oval to provide new and upgrades spectator and player amenities, broadcasting facilities, improved accessibility and increased number of fixed seating (no change to overall spectator capacity), including:

- Upgrades to the existing Western Grandstand, including:
  - Demolition of existing spectator and player amenities located on ground floor, existing seating, broadcast areas, hospitality and coaching facilities on level 2, existing stairs at the front of the grandstand and some facade elements.
  - New player change rooms and facilities, medical facilities, facilities for match officials and coaching staff, spectator amenities, utilities and other 'match day' related facilities
  - New 'Grandstand Bar', gym, spectator amenities, stairs and storage, and relocation of the existing telecommunications server
  - New spectator seating, corporate suites, television and radio broadcasting facilities, spectator amenities and upgrading the existing Centurions Lounge corporate area
  - Improved spectator circulation and egress arrangements, and general upgrades and maintenance to the existing building
- The construction of a new 'Northern Grandstand', including:
  - Earthworks and modification of existing retaining wall and embankment
  - Demolition of existing bathrooms at north end of seating bowl
  - A new concourse to provide spectator amenities and food and beverages
  - New spectator seating to level 1 of the grandstand above the concourse
  - Removal of 13 trees to facilitate the new grandstand
- Replacing existing seating to the lower seating bowl surrounding the playing field.

We have reviewed the following documents provided as part of the preparation of our advice.

- Planning & Co, 2025, EIS Leichhardt Oval Refurbishment
- TTW, 2025, Flood Statement Leichhardt Oval Refurbishment
- Cox Architecture, 2025, Leichardt Oval Refurbishment SSDA Design Report
- Planning & Co, 2025, Mitigation Measures Table TOD – 8-24 Nicholson Street, Wollstonecraft (SSD-86462209)
- If possible, can we **please request the Mitigation Measures Table for Leichhardt Oval Refurbishment to be provided.**

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.

We note the proposal has considered flooding issues in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines, including the Support for Emergency Management Planning and relevant planning circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including 4.1 Flooding and PS24-001.

In summary, the key issue identified is the risk of short-term isolation of the site due to floodwater, due to the impacts of climate change on access and egress routes. The flood modelling in 2010[1] and 2017[2] shows partial inundation on all access/egress routes to the site, therefore any increases to flooding on surrounding streets may lead to potential isolation of the site. Although updated flood modelling considering the latest Australian Rainfall and Runoff (ARR) guidelines has not been provided, the Flood Report provided does state *"the updated climate change factors are notably higher than those applied in the 2014 Flood Study, with a projected uplift of 41% in rainfall intensity for storm durations of less than 60-minutes by 2100 under SSP2- 4.5, a medium reference scenario."*[3] As the surrounding streets are prone to flash flooding, we recommend updated modelling should be undertaken to understand the risks of flooding which may isolate the site.

We provide the following recommendations:

- Consider undertaking updated climate change modelling using the latest ARR standards, to identify any changes to flood risk for access/egress routes.
- If updated flood modelling indicates that the site becomes isolated due to floodwater, consider providing clear messaging, such as signage, for people using the site to be aware of potential flood risk when accessing or leaving the site.

[1] Cardno, 2014, *Leichhardt Flood Study Volume 2* (Figures dated June 2010)
[2] Cardno, 2017, *Leichhardt Flood Study Addendum*
[3] TTW, 2025, *Flood Statement Leichhardt Oval Refurbishment*, page 23.

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

- Reducing Vulnerability of Buildings to Flood Damage
- Managing Flood Risk Through Planning Opportunities

Please feel free to contact Claire Flashman via email at 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
Senior Manager, Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[4]

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan[5] and the Inner West Council Flood Emergency Sub Plan[6] where evacuation is the preferred emergency management strategy for people impacted by flooding.

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Further, risk assessment should consider the full range of flooding, including events up to the PMF and not focus only on the 1% AEP flood. Climate change should also be considered based on the latest ARR guidelines. It is noted that the site itself may be prone to isolation by floodwater in PMF due to flooding on surrounding streets, which may increase when climate change considerations are included. If the site is prone to isolation by floodwater it will be classified as a High Flood Island.[7]

We recommend considering the impacts of climate change on access and egress routes. The flood modelling in 2017 shows partial inundation on all access/egress routes to the site, therefore any increases to flooding on surrounding streets may lead to potential isolation of the site. The Flood Report notes *"the updated climate change factors are notably higher than those applied in the 2014 Flood Study, with a projected uplift of 41% in rainfall intensity for storm durations of less than 60-minutes by 2100 under SSP2- 4.5, a medium reference scenario."*[8] It is also estimated that the actual probability of a 1 in 100 Annual Exceedance Probability (AEP) for this catchment area is approximately a 1 in 57 AEP event for the current 2026 scenario.[9] For the proposed development site, this could result in more frequent isolation than what is currently expected based on previous modelling.

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[4] NSW Government. 2023. Principles outlined in the *Support for emergency management planning guideline*
[5] NSW Government. 2024. *NSW State Flood Plan.* Section 5.1.7, page 34
[6] NSW SES. 2023. *Inner West Council Flood Emergency Sub Plan*. Section 5.8, page 17.
[7] State of NSW and Department of Planning and Environment. 2023 *Support for emergency management planning – Flood risk management guideline EM01*, Section C2, page 37.
[8] TTW, 2025, *Flood Statement Leichhardt Oval Refurbishment*, page 23.
[9] WMAwater. 2024. *Climate Change Calculator*. Retrieved 21 January 2026 from https://ccc.wmawater.com.au

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

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. Evacuation must not require people to drive or walk through flood water.

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.

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing flood risks associated with High Flood Islands requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Principle 5 Risks faced by the itinerant population need to be managed.

Any Emergency Management strategy needs to consider people visiting the area or using a development.

Principle 6 Recognise the need for effective flood warning and associated limitations.

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner.

NSW SES utilises the Australian Warning System which is a nationally consistent, three-tiered approach to issue clear warnings and lead people to take action ahead of severe weather

events. The three warning tiers consist of Advice, Watch and Act and Emergency Warning. These warnings can be viewed on the SES website and the HazardWatch website and app.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

It is essential that all site users, both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life.