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Ingrid Zhu  
Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

Via email

email: [ingrid.zhu@dpie.nsw.gov.au](mailto:ingrid.zhu@dpie.nsw.gov.au)  
CC: [shelly.stingmore@one.ses.nsw.gov.au](mailto:shelly.stingmore@one.ses.nsw.gov.au)

Dear Ingrid,

**State Significant Development Application for Newington College Redevelopment  
(Concept and Stage 1) (EIS)**

Thank you for the opportunity to provide advice on the Environmental Impact Statement for the Newington College Redevelopment (Concept and Stage 1), 200 Stanmore Road, Stanmore. It is understood that the proposed development seeks to undertake alterations and additions to the existing school campus including:

- Building envelope for the redevelopment of Sevington Courts to accommodate recreational facilities and teaching spaces.
- Building envelope for alterations and additions to Centenary Hall and development of an adjoining four storey teaching and learning facility (College Lane Building). This development will accommodate a cafeteria and dining hall, lecture theatre, multi-purpose teaching spaces and additional pastoral spaces.
- Building envelope for the redevelopment of the Concordia building to accommodate a performance theatre, multi-purpose gallery and exam centre, new teaching spaces and basement car parking and new pedestrian bridge across Stanmore Road to the main campus.
- Landscaping design strategy across the campus.
- Carparking provision and circulation arrangements.
- Increase of 368 Students and 45 full-time equivalent staff.

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

- Urbis, 2026, Environmental Impact Statement
- TTW, 2026, Flood Impact and Risk Assessment

- TTW, 2026, Flood Emergency Response Plan

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 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 Planning Circular [PS 26-001 Flooding and land use planning](#).

The site is affected by shallow overland flooding as frequently as the 39% Annual Exceedance Probability (AEP) event.<sup>1</sup> During the Probable Maximum Flood (PMF) flooding across the school campus are “*generally less than 100mm. Maximum flood depth in the detention system at the south-east corner sporting field is approximately 1.6m.*”<sup>2</sup> Flood Hazard during the PMF event is generally modelled as Hazard Level 1 (H1) with High Hazard (H5) in some isolated areas “*on the steep drop areas around the sporting fields*”<sup>3</sup> and on surrounding roads.

In summary, we:

- Support the proposed **protection of new buildings and basement car parking up to the PMF level** and the proposed emergency management strategy of **pre-emptive closure** of the school where possible.<sup>4</sup>
- **Recommend considering passive flood protection for pedestrian entryways rather than relying on flood gates.** Relying on a flood gate to mitigate flood risks as proposed, poses a higher risk of failure than truly passive flood mitigation, such as a landscape crest.

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

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

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<sup>1</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.1 39% AEP Event, Page 26

<sup>2</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.3 PMF Event, Page 30

<sup>3</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.3 PMF Event, Page 30

<sup>4</sup> TTW, 2026, Flood Emergency Response Plan

Please feel free to contact Kate Dawes 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,

A handwritten signature in grey ink, appearing to read 'P. Cinque'.

Peter Cinque  
Senior Manager, Emergency Risk Management  
**NSW State Emergency Service**

## **ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>5</sup>**

### **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<sup>6</sup> and the Inner West Council Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.<sup>7</sup>

### **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 Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. Climate change should also be considered.

The site is affected by shallow overland flooding as frequently as the 39% AEP event.<sup>8</sup> During the PMF flooding across the school campus are “*generally less than 100mm. Maximum flood depth in the detention system at the south-east corner sporting field is approximately 1.6m.*”<sup>9</sup> Flood Hazard during the PMF event is generally modelled as Hazard Level 1 (H1) with High Hazard (H5) in some isolated areas “*on the steep drop areas around the sporting fields*”<sup>10</sup> and on surrounding roads.

It is noted that the proposed development includes “*proposed basement car parking area of the Sevington building (Stage 1 works) will be protected to the Probable Maximum Flood (PMF) event assessed, including the PMF event in the future 2090 conditions*”<sup>11</sup> as well as floor levels of proposed buildings located above the PMF level. The redeveloped Concordia Building will also include protection for basement parking up to the PMF level, providing a higher level of flood immunity than the existing Concordia Building which begins to experience basement inundation during the 1% AEP event “*as the flood level in the car park entrance area is*

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<sup>5</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>6</sup> NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

<sup>7</sup> NSW SES, Inner West Council Flood Emergency Sub Plan, Endorsed October 2023, Section 5.8

<sup>8</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.1 39% AEP Event, Page 26

<sup>9</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.3 PMF Event, Page 30

<sup>10</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.3 PMF Event, Page 30

<sup>11</sup> Urbis, 2026, Environmental Impact Statement, Section 6.1.7 Flooding Risk, Page 126

*estimated to be approximately 37.006m AHD (i.e. the crest to the car parking area is surveyed at 37.00m AHD)”<sup>12</sup>*

It is further noted that the development includes a “*minimum height of 700mm of flood gates/barriers are proposed at the Sevington pedestrian entrance areas to prevent floodwater from Stanmore Road from inundating the proposed Sevington podium and connected building areas.*”<sup>13</sup> Flood gates and barriers are considered to introduce additional risk compared to passive protection and careful consideration should be given to their inclusion.

In addition to a significant risk of failure, flood gates may prevent access during flood events. The safety of the floodgates as they activate, and the vulnerability of the occupants should be considered. Young children or persons with reduced mobility, for example, may be exposed to an unacceptable hazard. Flood gates across pedestrian entry points also introduce the risk of trapping people outside the development in high flood risk areas, this requires particular consideration as the Stanmore Road, adjacent to the proposed flood gate location is inundated by High Hazard H5 flooding as frequently as the 1% AEP event.<sup>14</sup>

There are currently no regulations to enforce the continued use of flood gates for the life of the development. Maintenance of the flood gates may also be perceived as too onerous and expensive by the operators of the facility. At a minimum a condition of consent requiring the maintenance of the flood gate to the manufacturers specifications should be included for the life of this development.

**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.**

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<sup>12</sup> TTW, 2026, Flood Impact and Risk Assessment, Section 5.1.2 1% AEP Event, Page 28

<sup>13</sup> TTW, 2026, Flood Impact and Risk Assessment, Executive Summary, Page 4

<sup>14</sup> TTW, 2026, Flood Impact and Risk Assessment, Figure 22 Existing Scenario – Peak Flood Hazard at the Site in the 1% AEP Event, Page 30

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.**

Development within a floodplain will necessitate ongoing involvement from the NSW SES in community awareness, preparedness, and response activities. 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. This includes:

- Raising awareness of flood risk
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Importantly, a private flood management plan is insufficient to address flood risk on this site.

Residents and users of the proposed development should be made aware of their flood risk and be encouraged to use available tools and resources, including:

- [Hazards Near Me app](#) – part of the Australian Warning System, providing timely flood warnings
- [NSW SES website](#) – offering comprehensive guidance on flood preparedness, response, and recovery, including multilingual resources
- [HazardWatch](#) – an interactive platform for accessing real-time flood information and warnings