

Our Ref: ID 3316
Your Ref: SSD-65595459

24 September 2025

Teresa Gizzi
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124
Via Major Portal

email: teresa.gizzi@planning.nsw.gov.au
CC: lisa.ignatavicius1@ses.nsw.gov.au

Dear Teresa,

State Significant Development Application for Indoor Sports Centre (HISC)

Thank you for the opportunity to provide comment on the State Significant Development Application (SSDA) for Hunter Indoor Sports Centre (HISC) at 2 Monash Road and 24 Wallarah Road, New Lambton, Newcastle LGA. It is understood that the amended project description and works for which the SSDA seeks consent are:

- Demolition of existing amenities block and flood lighting infrastructure.
- Site remediation and Tree removal.
- Site layout including carpark and landscaping.
- A single storey plus mezzanine indoor sports centre with amenities, administration spaces and retail tenancy, mezzanine level function rooms, administration space and training areas. The centre will provide 12 sports courts including a show court with retractable grandstand seating for 2,500 people and high-performance training facilities (teaching space and gym).
- GFA of approximately 17,700m², comprising ground floor of approximately 15,300m² and first floor mezzanine of 2,400m² and maximum building height of RL 25.25 (16.03m).
- Civil works including construction of new vehicular access and egress point to Turton Road and an internal roadway.
- Service infrastructure provision.
- Car park with 240 spaces.
- Site landscaping.
- Pedestrian paths.
- Building and site signage.
- Public domain works to part of the site frontage to Turton Road.
- Consent is sought for the entire proposal, with flexible staging to construction and operation of the HISC in two stages.

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 NSW SES recommends that consideration of flooding issues is undertaken 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 directions under the *Environmental Planning and Assessment Act, 1979*.

We refer to our previous response dated 11 November 2024, with reference ID2728, including the key considerations relating to emergency management. We provide further advice below, based on our review of the proposed amendments and updated project documentation.

Recommendations

In summary, we:

- **Recommend** considering site design to avoid entry or exit through high hazard areas (such as the Turton Road exit).
- **Recommend** investigating alternative site design options that may provide vehicular access northwest to Womboin Road, *if feasible*, noting that currently this is the proposed pedestrian emergency access – which appears to remain flood free up to and including the 0.2% AEP events and provides rising road access,¹ thus providing improved flood resilience compared to the Turton Road access.
- **Support** the approach of early closure of the site ahead of the weather event, particularly given the flash flooding nature of the local catchment that would provide insufficient opportunity to evacuate.²
- **Recommend** referring to the considerations in the [Shelter in Place Guideline](#) (DPHI, 2024, including the considerations for the refuge area design).
- **Recommend** removing any reference to people wading through floodwater from the FERP³. Evacuation must not require people to drive or walk through flood water.
- **Recommend** considering building design able to withstand the potential flood forces and debris loading of the PMF, so that structural failure is avoided during a flood, especially considering the flash flood nature at the site.
- **Recommend** seeking advice from NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impacts of the proposed

¹ Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Impact and Risk Assessment – Response to Submissions Draft, Figure 7-1 and Figures A-5 & B-5

² Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Impact and Risk Assessment – Response to Submissions Draft, page 49

³ Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Impact and Risk Assessment – Response to Submissions Draft, page 52

development on flood behaviour at the site and neighbouring and downstream properties, particularly as the proposal includes significant fill within the floodplain.

Flood risk at the site

In existing conditions, a small part in the northeastern corner of the site becomes impacted by flooding (less than 0.2 metres peak) as frequently as 10% Annual Exceedance Probability (AEP) events,⁴ however, site vehicular access (onto Turton Road) would be cut in these frequent events, and therefore access/egress and evacuation would be restricted.⁵

In a 1% AEP the eastern half of the site becomes inundated with flood depths peaking around 1 metre depth and H3 flood hazard level,⁶ with the higher flood depths and hazard level around its vehicular access/egress point. It is understood that in post-development conditions some of the flood flows are captured within the proposed swale (that can see flood depths in excess of 2 metres in a 1% AEP event⁷), however the site access/egress remains impacted by H3 hazard level flooding which is unsafe for people and vehicles.⁸

In a Probable Maximum Flood (PMF) event, almost the entire site becomes inundated with flood depths that can exceed 2 metres and flood hazard peaking at H4 - H5,⁹ noting that in both existing and post-development conditions, the site's vehicular access/egress onto Turton Road is cut by H5 hazard level flooding.¹⁰ It is understood that the building ground floor is expected to become flooded in a PMF event, with a depth of around 0.5 metres.¹¹

The duration of isolation is anticipated to be less than six hours, based on the critical duration design events, however this has not been demonstrated in the current report.¹²

We **note** that the FERP acknowledges that “the provision of space and toilets is slightly less than recommended in the Australian Red Cross guidelines,”¹³ with the nominated flood refuge area on the first-floor level of the building, providing an “**available floor area of around 2400 m², the Flood Refuge can accommodate up to 2500 people potentially present on the Site.**”¹⁴

The FERP also implies it is safe to enter floodwater, “*Even during the peak conditions of a PMF event, **pedestrian egress from the Site would still be possible to Womboin Road, albeit by***

⁴ Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Impact and Risk Assessment – Response to Submissions Draft, Figure 4-4

⁵ Ibid., page 50

⁶ Ibid., Figure A-3 & A-8

⁷ Ibid., Figure B-3

⁸ Ibid., Figure B-8

⁹ Ibid., Figure 4-6 & 4-9

¹⁰ Ibid., Figure 5-7

¹¹ Ibid., page 51

¹² Ibid., page 52

¹³ Ibid.

¹⁴ Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Impact and Risk Assessment – Response to Submissions Draft, page 55 - 56

wading through medium hazard flood waters.”¹⁵ Floodwaters should not be entered, particularly by school children who are particularly vulnerable to the hydraulic hazards and potential debris and contaminants.

Further, it is noted that *“An on-site flood warning system monitors the water level within the swale area at the front of the Site adjacent to Turton Road. Once the water level reaches a sufficient height to compromise egress from the Site (7.8 m AHD), an alarm will be activated inside the building. This enables a remotely operated boom gate to be closed, preventing vehicular egress from the Site. A second alarm will be activated if the water level in the swale continues to rise to a level high enough to initiate flooding within the car park (8.2 m AHD). This provides sufficient time to relocate people to the first floor of the building prior to any potential (albeit extremely unlikely) internal inundation of the building.”¹⁶*

While the NSW SES does not advise against having the on-site water level sensors **as an additional layer for warning**, we would like to **emphasise** that the Bureau of Meteorology (BOM) and NSW SES official warning products **must be the primary source of truth** to trigger evacuation from/closure of the site and these official warnings will override any indication/decision made by the site Flood Wardens based on the on-site flood level sensor indications. We **appreciate** that the FERP acknowledges that *“any flood response directive issued by the SES or by delegated authority to others acting on its behalf must be followed by BANL staff and visitors. This includes any order to evacuate the Site or not evacuate the Site, irrespective of what decisions have been made by management in accordance with this FERP.”¹⁷*

Please feel free to contact Ana Chitu 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,



Elspeth O'Shannessy
Manager Emergency Risk Assessment
NSW State Emergency Service

¹⁵ Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Impact and Risk Assessment – Response to Submissions Draft, page 52

¹⁶ Torrent Consulting. 2025. Hunter Indoor Sports Centre Flood Emergency Response Plan - Response to Submissions Final, page 18

¹⁷ Ibid., page 20