

Our Ref: ID 3413
Your Ref: SSD-73365208

31 October 2025

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

email: cameron.thomson@dpie.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Cameron,

State Significant Development Application for Fairfield Showground Community and Events Centre

Thank you for the opportunity to provide comment on the State Significant Development Application for Fairfield Showground Community and Events Centre, located at 430-482 Smithfield Road, Prairiewood. It is understood that the proposed development is for the construction of a multi-purpose building to be used for a recreation facility (indoor), function centre and entertainment facility, with a capacity of up to 3,000 persons,¹ that will provide about 241 construction jobs and a mix of 26 full time and casual jobs during operation.²

The project forms part of a masterplan located on the Fairfield Showground site which will comprise works to be carried out under multiple planning pathways, as follows.³

The proposed extent of works to be carried out under the development permitted without consent (Part 5/REF) planning pathway as part of the masterplan includes:

- Demolition of six small ancillary buildings and construction of a new amenities block;
- Road and car parking upgrades and new car parking area;
- New kiosk/substation; and
- Associated civil and landscape works.

The proposed extent of works to be carried out under this SSDA as part of the masterplan includes:

- Construction and use of a one-storey multi-purpose building; and

¹ DFP. 2025. Environmental Impact Statement - SSD-73365208, page xiii & 2

² DFP. 2025. Environmental Impact Statement - SSD-73365208, page 16

³ WMAwater. 2025. Flood Impact and Risk Assessment, page 7 - 8

- Associated civil and landscape works.

We note on-site at-grade car parking is provided in multiple locations throughout the site, with a total of 1,010 parking spaces comprising 754 formal and 256 informal available in Fairfield Showground at the completion of the project, representing a net reduction of 31 informal spaces from the last surveyed parking at Fairfield Showground.⁴

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.

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*. Some of the key considerations relating to emergency management are further detailed in Appendix A.

The Flood Impact and Risk Assessment (FIRA) notes that the site is impacted by mainstream and overland flooding, with the latter producing the highest peak flood levels across the full range of events.⁵ The peak flood depths in the PMF event reach up to 1 m (at the northwestern corner of the building) and up to H4 – H5 flood hazard level.⁶ We **note** the proposed finished floor level of the main building is at 30.81 m AHD,⁷ above the PMF level of 30.48 m AHD at the site.⁸ The modelling suggests that the access and evacuation routes to the south of the site appear to remain trafficable in the PMF event, providing rising road access.^{9 10}

In summary, we:

- Noting the flood emergency management plan proposes shelter in place in the building above the PMF due to the flash flooding nature of the catchment,¹¹ we **advise** the proponent should demonstrate consistency with the [Shelter in Place Guideline](#) (NSW Government, 2024) to ensure the risk to life is adequately managed and/or mitigated. Further, any **proposed refuge location should** align with the design criteria in the NSW Government shelter-in-place for flash flooding Guideline,¹² and the Red

⁴ DFP. 2025. Environmental Impact Statement - SSD-73365208, page 2 & 27

⁵ WMAwater. 2025. Flood Impact and Risk Assessment, page 11

⁶ WMAwater. 2025. Flood Impact and Risk Assessment, Figure 10

⁷ WMAwater. 2025. Flood Impact and Risk Assessment, Attachment

⁸ WMAwater. 2025. Flood Impact and Risk Assessment, Table 2, page 11

⁹ WMAwater. 2025. Flood Impact and Risk Assessment, Figure 3 & 10

¹⁰ Molino Stewart. 2015. Three Tributaries Floodplain Risk Management Study & Plan, Figure 29, page 81

¹¹ WMAwater. 2025. Flood Impact and Risk Assessment, page 23

¹² NSW Department of Planning, Housing and Infrastructure. 2024. Shelter-in-place guideline for flash flooding, page 6

Cross Preferred Sheltering Practices for Emergency Sheltering in Australia,¹³ including water supply, waste management, sanitation, food, and shelter and space management.

- **Recommend considering** early closure of the site and cancelling any major events ahead of the onset of rainfall, if there is any indication of potential for flooding at the site, such as Severe Weather Warnings for this area. This will assist in mitigating risk to life for people who may not be familiar with the flood risk in the area and may attempt to travel through flood affected roads to get to/from the site, noting there are multiple road closure points in the broader surrounding area, some as frequent as 20 year Annual Recurrence Interval (ARI) flooding events.¹⁴
- **Support** updating the Fairfield Showground Flood Emergency Management Plan (FEMP) to incorporate the new proposed facility,¹⁵ and **recommend ensuring** that it provides for flood risk education and awareness of all site users (staff, contractors and visitors), including information and signage for people to avoid the northern and western parts of the site and access points during flooding events, due to high hazard flooding in these areas of the site, and directing people to the southern access/egress in case of emergency during flooding events.
- **Recommend considering** relocation of the equipment (such as fire pumps, hydrant booster, etc.) from the basement level at the northern side of the building, which may be inundated to a depth of approximately 1.1 metres in the PMF event, as this area would likely not be accessible and equipment may not be functional in the PMF event.¹⁶ This would ensure critical equipment remains accessible and functional at all times, to improve resilience to flooding and ensure secondary risks to life and property (such as building fire) can be appropriately mitigated.
- **Recommend** the consent authority is satisfied that building design considers the potential flood and debris loadings of the PMF so that structural failure is avoided during a flood.

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

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

Please feel free to contact our team 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.

¹³ Smith, C., and Parsons, C. 2015. Preferred Sheltering Practices for Emergency Sheltering in Australia. Retrieved from <https://www.redcross.org.au/globalassets/cms-assets/documents/emergency-services/2015-preferred-sheltering-practices-for-emergency-sheltering-in-australia.pdf>

¹⁴ Molino Stewart. 2015. Three Tributaries Floodplain Risk Management Study & Plan, Figure 29, page 81

¹⁵ WMAwater. 2025. Flood Impact and Risk Assessment, page 23

¹⁶ WMAwater. 2025. Flood Impact and Risk Assessment, page 24

Yours sincerely,

A handwritten signature in grey ink, which appears to read 'P. Cinque', is positioned below the closing salutation.

Peter Cinque
Senior Manager Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹⁷

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 evacuation strategies identified in the NSW State Flood Plan¹⁸ and the Fairfield City Local Flood Emergency Sub Plan,¹⁹ 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.

We note the project site area has a gradual fall northward, from RL 31 m AHD to RL 29 m AHD. **(EIS, p 2)** Orphan School Creek flows through the northern portion of the site and comprises tributaries towards the west, south and east of the site.²⁰ It is understood that the Fairfield Golf Course Detention Basin upgrades, which included upgrading the embankment that forms the levee on the northern side of the site have been completed by Fairfield Council and this updated flood model with the embankment was used to inform mainstream and overland flood behaviour for the proposed Community and Events Centre.²¹

The identified critical duration storm for the creek was the 2 hour storm for the 5% and 1% AEP events, and the 1 hour storm for the PMF event, with a duration of inundation at the northwestern corner of the proposed building (above 0.15 m depth) if approximately 70 minutes.²²

The modelling suggests that the proposed development site is not affected by **mainstream flooding** in the 5% Annual Exceedance Probability (AEP) or 1% AEP events, mainly due to the level of protection afforded by levees to the north of the site.²³ In the Probable Maximum Flood (PMF) event, flood waters overtop the banks of creek to the west and levees north of the site, with the northern portion of the broader showground site being inundated with flood

¹⁷ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

¹⁸ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

¹⁹ NSW SES. 2023. Fairfield City Local Flood Emergency Sub Plan. Section 1.6.2, page 8

²⁰ DFP. 2025. Environmental Impact Statement - SSD-73365208, page 3

²¹ WMAwater. 2025. Flood Impact and Risk Assessment, page 9 - 10

²² WMAwater. 2025. Flood Impact and Risk Assessment, page 10 & 22

²³ WMAwater. 2025. Flood Impact and Risk Assessment, page 9 and Figure 1 & 2

depths up to 1 metre.²⁴ At the proposed building location, peak flood depths in the PMF event reach up to 0.5 m (at the northwestern corner of the building), and the peak flood level at the building is 30.1 mAHD, occurring at the western side of the building.²⁵

The proposed development site appears to not be affected by the 5% AEP **overland flooding** events, and flow depths remain less than 0.15 metres up to the 0.5% AEP events.²⁶ In the PMF overland flooding event, flood waters overtop the banks of creek to the west and levees north of the site, with a significant part of the showground site (the northern portion) being inundated with flood depths in excess of 1 metre and up to H5 flood hazard level.²⁷ At the proposed building location, peak flood depths in the PMF event reach up to 1 m (at the northwestern corner of the building) and up to H4 – H5 flood hazard level,²⁸ and the peak flood level at the building is 30.5 mAHD, occurring at the western side of the building.²⁹

It is understood that the current **vehicular access** to Fairfield Showground is not proposed to change. The main entrance is via Smithfield Road and Richards Road intersection. Secondary vehicular access point is available from the Moonlight Road and Greenfield Road intersection. A secondary access is available north of the main entrance on Smithfield Road.³⁰

The site appears to have rising road access south, via Smithfield Road (either from the internal road directly onto Smithfield Road, or via Greenfield Road, Scotchey Street onto Smithfield Road), up to and including the PMF events.³¹ Similarly, the overland flood modelling suggests that the proposed access and evacuation routes to the south of the site appear to remain trafficable in the PMF event.³² *Open car parking is proposed on the southern side of the building, with the existing car park to be regraded and resurfaced. The car park is not part of the scope of works being assessed in this report, however, it is noted that the minimum existing level is 31.71 mAHD. This is approximately 1.2 m above the PMF level and complies with minimum level controls. The internal road to this car park rises from the car park to the south and is also not inundated.*³³

The proposed building maintains access to the southern side up to the PMF event³⁴ and the main building floor level is at 30.81 m AHD, over 1 metre above the minimum required floor level of 29.50 m AHD (1% AEP + 0.5 m freeboard), placing the ground floor level above the

²⁴ WMAwater. 2025. Flood Impact and Risk Assessment, page 10 and Figure 3

²⁵ WMAwater. 2025. Flood Impact and Risk Assessment, page 10 and Figure 3

²⁶ WMAwater. 2025. Flood Impact and Risk Assessment, page 10

²⁷ WMAwater. 2025. Flood Impact and Risk Assessment, page 10 and Figure 7 & 10

²⁸ WMAwater. 2025. Flood Impact and Risk Assessment, Figure 10

²⁹ WMAwater. 2025. Flood Impact and Risk Assessment, page 10

³⁰ DFP. 2025. Environmental Impact Statement - SSD-73365208, page 26

³¹ Molino Stewart. 2015. Three Tributaries Floodplain Risk Management Study & Plan, Figure 29, page 81

³² WMAwater. 2025. Flood Impact and Risk Assessment, Figure 10

³³ WMAwater. 2025. Flood Impact and Risk Assessment, page 17

³⁴ WMAwater. 2025. Flood Impact and Risk Assessment, page 22 - 24

PMF level (30.48 m AHD)³⁵ by approximately 0.3 metres.³⁶ Noting the flood emergency management plan proposes for people to shelter in place in the building above the PMF in the event of flooding due to the flash flooding nature of the catchment,³⁷ we **advise** the proponent should demonstrate consistency with the [Shelter in Place Guideline](#) (NSW Government, 2024) to ensure the risk to life is adequately managed and/or mitigated.

Any proposed refuge location should align with the design criteria in the NSW Government shelter-in-place for flash flooding Guideline,³⁸ and the Red Cross Preferred Sheltering Practices for Emergency Sheltering in Australia,³⁹ including water supply, waste management, sanitation, food, and shelter and space management.

In addition, we **recommend considering** early closure of the site and cancelling any major events ahead of the onset of rainfall, if there is any indication of potential for flooding at the site, such as Severe Weather Warnings for this area. This will assist in mitigating risk to life for people who may not be familiar with the flood risk in the area and may attempt to travel through flood affected roads to get to/from the site. Noting that while the southern access appears to remain flood free, there are multiple road closure points in the broader surrounding area, some as frequent as 20 year Annual Recurrence Interval (ARI) flooding events, including Smithfield Road (both further south and north of the site) and Moonlight Road (west of the site).⁴⁰ The analysis of the impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand the risks.

We **support** updating the Fairfield Showground Flood Emergency Management Plan (FEMP) to incorporate the new proposed facility,⁴¹ and **recommend ensuring** that it provides for flood risk education and awareness of all site users (staff, contractors and visitors), including information and signage for people to avoid the northern and western parts of the site and access points during flooding events, due to high hazard flooding in these areas of the site, and directing people to the southern access/egress in case of emergency during flooding events. A regular testing, monitoring and review schedule should be included in the flood emergency plan. FEMPs should be regularly exercised, similar to building fire evacuation drills and updated at regular intervals and whenever additional flood information is available or highlighted during the drills or flood events.

The building has basement level (B1 level) at an elevation of 29.41 m AHD situated at the northern end of the building, where utilities associated with the building are located. Although this area is above the 1% AEP level, it may be inundated to a depth of approximately 1.1 m in

³⁵ WMAwater. 2025. Flood Impact and Risk Assessment, Table 2, page 11

³⁶ WMAwater. 2025. Flood Impact and Risk Assessment, page 14

³⁷ WMAwater. 2025. Flood Impact and Risk Assessment, page 23

³⁸ NSW Department of Planning, Housing and Infrastructure. 2024. Shelter-in-place guideline for flash flooding, page 6

³⁹ Smith, C., and Parsons, C. 2015. Preferred Sheltering Practices for Emergency Sheltering in Australia. Retrieved from <https://www.redcross.org.au/globalassets/cms-assets/documents/emergency-services/2015-preferred-sheltering-practices-for-emergency-sheltering-in-australia.pdf>

⁴⁰ Molino Stewart. 2015. Three Tributaries Floodplain Risk Management Study & Plan, Figure 29, page 81

⁴¹ WMAwater. 2025. Flood Impact and Risk Assessment, page 23

the PMF event. It is likely that this area would not be accessible and equipment (such as fire pumps or the hydrant booster) may not be functional in the PMF event.⁴² To improve resilience to flooding and ensure secondary risks to life and property (such as building fire) can be appropriately mitigated, we **recommend considering** relocation of this equipment to an area above the PMF, if feasible, to ensure critical equipment remains accessible and functional at all times.

In addition, we **recommend** the consent authority is satisfied that building design considers the potential flood and debris loadings of the PMF so that structural failure is avoided during a flood.

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 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.

⁴² WMAwater. 2025. Flood Impact and Risk Assessment, page 24

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.

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

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase, for the life-span of the development.