

Our Ref: ID 1683  
Your Ref: SSD-11070211 – Mod 1

15 August 2022

Patrick Andrade  
Department of Planning and Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2150

via email: Patrick.Andrade@dpie.nsw.gov.au; Tahlia.Alexander@planning.nsw.gov.au

Dear Patrick,

**State Significant Development Modification for New Public School in Mulgoa Rise,  
Glenmore Park**

Thank you for the opportunity to provide comment on the State Significant Development (SSD) modification for the New Public School in Mulgoa Rise, Glenmore Park. It is understood that the modification application seeks approval for the temporary placement of demountables to operate a temporary school for up to two years, whilst the permanent school is being constructed.

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.

NSW SES has reviewed the SSD modification and associated documents against the existing information available, including flood studies and flood emergency plans. Attention is drawn to the following principals outlined in the NSW Floodplain Development Manual, 2005 (the Manual) which are of importance to the NSW SES role as described above:

- The Flood Impact Assessment only considers the impacts of riverine flooding for a 1% AEP flood, not the PMF. **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.** There is no information available for the site relating to Surveyors Creek, which may impact the site.
- **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.** It appears that the proposed school becomes isolated by overland flooding by the time a 1% AEP flood is reached, and evacuation routes are no longer accessible. The study should consider floods that are also more frequent, e.g. 5% AEP, 10% AEP etc. to determine how frequently the

school is at risk of isolation. The school is then flooded in a PMF by shallow floodwater (<0.5m) across the entire site.

- Page 12 of the Flood Impact Assessment identifies the potential to consider shelter in place as an emergency management strategy. **Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation.** 'Shelter in place' strategy is not an endorsed flood management strategy by the NSW SES for future development.
- **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.** As school-aged children are unable to self-evacuate they must rely on carers to pick them up prior to the roads becoming flooded. It is advisable that the school is closed prior to flooding commencing, and if possible prior to the commencement of the school day. For example, this may be based on Severe Thunderstorm Warnings and Severe Weather Warnings from the Bureau of Meteorology in the metropolitan area to give an indication of possible overland flooding. Given the shallow depth and short duration of the overland flooding identified at the site, refuge may sought in flood free buildings within the school as a last resort if evacuation is not successfully completed in time and the school day has already commenced.
- **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 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 the school children remain on-site during 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.** We note the condition for consent has been provided to demonstrate feasibility of evacuation prior to occupation.

Please feel free to contact me 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. We would be interested in receiving information regarding the outcome of this referral in the future.

Yours sincerely,



Elspeth O'Shannessy  
Planning Coordinator, Emergency Risk Management  
NSW State Emergency Service