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Dear Teresa,

Environmental Impact Assessment for New Public School Gregory Hills

Thank you for the opportunity to provide comment on the Environmental Impact Assessment (EIS) for New Public School Gregory Hills. It is understood that the proposed development includes:

- 44 general learning spaces and 4 support learning spaces
- Administration, staff hub and amenities
- Library, community hall and canteen
- Sports courts and play area
- Kiss and drop, on site carparking and footpath widening.

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 consent authority will need to ensure that the assessment is considered against the relevant Ministerial Section 9.1 Directions, including 4.3 – Flood Prone Land and is consistent with the NSW Flood Prone Land Policy as set out in the NSW Floodplain Development Manual, 2005 (the Manual). Attention is drawn to the following principles outlined in the Manual which are of importance to the NSW SES role as described above:

- **Development must not result in an increase in risk to life, health or property of people living on the floodplain.**

The flood impact to the site up to a PMF is noted as minimal in the Flood Study, affecting the site boundary only and not the proposed buildings. Most of the site is above the PMF.

It is understood that the proposal involves a cut and fill strategy to manage flood risk. Advice should be sought from the Environment and Heritage Group of the Department of Planning and Environment.

- **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.**

This has been considered in the flood study provided. The duration and time to onset of flooding should also be considered.

- **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.**

It is noted that many of the adjacent roads are impacted in a 1% AEP event (based on the flood study provided). However, it appears that access may still be available via the small Long Reef Circuit and Wallarah Circuit (east), if required.

- **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' is not an endorsed flood management strategy by the NSW SES for future development. Such an approach is only considered suitable to allow existing dwellings that are currently at risk to reduce their risk, without increasing the number of people subject to such risk. The flood evacuation constraints in an area should not be used as a reason to justify new development by requiring the new development to have a suitable refuge above the PMF. Allowing such development will increase the number of people exposed to the effects of flooding. Other secondary emergencies such as fires and medical emergencies may occur in buildings isolated by floodwater. During flooding it is likely that there will be a reduced capacity for the relevant emergency service agency to respond in these times. Even relatively brief periods of isolation, in the order of a few hours, can lead to personal medical emergencies that have to be responded to.

The Flood Study should be amended to reflect that the preferred strategy is early closure of the school, prior to the onset of flooding on any adjacent roads. An alternative strategy would be for the students to move away from the floodwater, as most of the school is above the PMF.

- **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.**

The Manual specifically precludes the practice of consent conditions requiring a site plan if that plan is trying to overcome an underlying flood risk that would otherwise be considered too high to permit approval (see Annex L-3). In other words, if the existence of a flood plan is ignored, is the underlying flood risk unacceptable in the context of the proposed development.

Although NSW SES encourages homes and businesses to be prepared and has developed a home FloodSafe toolkit and a Business FloodSafe toolkit, even well written plans are dependent on human application and often rely on technical support systems. Most plans will rely on the actions of one or more third parties and all plans require regular maintenance and review, and most importantly an ongoing commitment from all participants. These conditions are difficult enough to implement and monitor over the long term for a full-time emergency service and are unlikely to be achieved at all in a private ownership context where there is no external audit or monitoring.

However, we do emphasise that the preferred strategy for schools is ensuring early closure prior to the onset of flooding, preferably prior to the commencement of the school day. As there are no formal warning systems for this area, this makes this process more complex. Instead, the trigger for closure may be based on a severe weather warning for flash flooding. The dipstick is not a formal warning system and NSW SES does not issue flood warnings, which should be updated in the Flood Study.

- **NSW SES is opposed to development strategies that transfer residual risk, in terms of emergency response activities, to NSW SES and/or increase capability requirements of the NSW SES.**
- **Consent authorities should consider the cumulative impacts any development will have on risk to life and the existing and future community and emergency service resources in the future.**

In summary, preferred strategy is early closure of the school, prior to the onset of flooding on any adjacent roads. An alternative strategy would be for the students to move away from the floodwater, as most of the school is above the PMF, and there appears to be access and egress available via Long Reef Circuit and Wallarah Circuit (east).

You may also find the following Guidelines, originally developed for the Hawkesbury Nepean Valley and available on the NSW SES website useful:

- Reducing Vulnerability of Buildings to Flood Damage

Please feel free to contact Elspeth O'Shannessy 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

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

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