

Our Ref: ID 2728  
Your Ref: SSD-65595459

11 November 2024

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Department of Planning, Housing & Infrastructure  
Locked Bag 5022  
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Via Major Portal

email: navdeep.singhshergill@planning.nsw.gov.au  
CC: lisa.ignatavicius1@ses.nsw.gov.au

Dear Navdeep

**Environmental Impact Assessment for Hunter Indoor Sports Centre (HISC) SSD-65595459**

Thank you for the opportunity to provide comment on the Environmental Impact Assessment (EIS) for EIS Hunter Indoor Sports Centre (HISC), 2 Monash Road and 24 Wallarah Road, New Lambton. It is understood that the proposed development seeks to undertake development of an indoor sports stadium including:

- Demolition of existing buildings, site remediation and tree removal.
- Site layout including carparking and landscaping.
- Construction of a single-storey plus mezzanine indoor sports centre with amenities, administration spaces and retail tenancy, mezzanine level function rooms, administration space and training areas.
- Civil works including vehicle access points and internal roadway.
- Service infrastructure.
- Car park with 240 spaces.
- Landscaping, external recreation area, landscaping and pedestrian paths.
- Building and site signage.
- Public domain works to part of the site frontage to Turton Road.

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 and circulars relating

to the *Environmental Planning and Assessment Act, 1979*. Some of the issues which are of concern to the NSW SES are detailed in Attachment A.

**In summary:**

- **Note** the site is affected by flooding up to 1 metre in depth during the 1% Annual Exceedance Probability (AEP) flood event<sup>1</sup>. During the Probable Maximum Flood (PMF) event the site is inundated to depths in excess of 1.5 metres across the site<sup>2</sup>.
- **Recommend** revising the Flood Emergency Response Strategy including:
  - an assessment of the full range of flood risk on site and surrounding access/egress routes, including time to overtopping of roads, time to onset and duration of inundation.
  - review of available warnings for the site and the amount of warning time available, including warnings from the Australian Warning System.
  - clearly defined actions and triggers for implementing emergency plans.
- **Emphasise** that NSW SES does not support shelter in place as a strategy for new development or the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.
- **Recommend** closing the site early if there is a risk of flooding, on receipt of advice from the Bureau of Meteorology (BoM), or when other evidence leads to an expectation of flooding, as a primary emergency management strategy.
- **Recommend** seeking advice from the Department of Climate Change, Energy, the Environment and Water.

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](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

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,



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

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<sup>1</sup> Rhelm, 2023, Throsby, Styx and Cottage Creek Flood Study, Map G306b Peak Flood Depth and Elevation 1% AEP

<sup>2</sup> Rhelm, 2023, Throsby, Styx and Cottage Creek Flood Study, Map G308b Peak Flood Depth and Elevation PMF

## **ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>3</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 evacuation strategies identified in the relevant local or state flood plan or by the NSW SES. As per the NSW State Flood Plan<sup>4</sup> and the City of Newcastle Flood Emergency Sub Plan, evacuation is the primary emergency management strategy for people impacted by flooding<sup>5</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. Climate change considerations should also be included.

The southern boundary of the site is formed by Ker-rai Creek, also identified as a storm water canal<sup>6</sup> with the site affected by flooding up to 1 metre in depth during the 1% AEP flood event<sup>7</sup>. During the PMF event the site is inundated to depths in excess of 1.5 metres across the site<sup>8</sup>, reaching a high hydraulic hazard (H5), unsafe for all people and vehicles with buildings requiring special design and construction.

The Flood Emergency Response Strategy provided includes a proposed evacuation route which is accessible only on foot and by traversing H3 flooding during the PMF event<sup>9</sup>. It is unacceptable, as the primary evacuation strategy, to expect people to escape from a flood on foot (also referred to as overland escape/overland access), especially with the high likelihood of ongoing poor weather conditions and should not be used to justify the development. Pedestrian evacuation is a backup strategy. We recommend the preferred emergency response should be to close the facility early on early if there is a risk of flooding, on receipt of advice from the Bureau of Meteorology.

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<sup>3</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>4</sup> NSW Government. 2021. NSW State Flood Plan. Section 1.6 – Key Principles. 1.6.2, page 5.

<sup>5</sup> NSW SES, City of Newcastle Flood Emergency Sub Plan, Endorsed December 2022, Section 5.8

<sup>6</sup> Urbis, 2024, Environmental Impact Statement, Table 5 Key Features of Site and Locality, Stormwater and Flooding, Page 34

<sup>7</sup> Rhelm, 2023, Throsby, Styx and Cottage Creek Flood Study, Map G306b Peak Flood Depth and Elevation 1% AEP

<sup>8</sup> Rhelm, 2023, Throsby, Styx and Cottage Creek Flood Study, Map G308b Peak Flood Depth and Elevation PMF

<sup>9</sup> Torrent Consulting, 2024, Flood Emergency Response Strategy, Figure 2-2 Flood Egress/Ingress Route, Page 13

The Emergency Response Strategy further states *“The flood hazard condition during the peak of the PMF event is H3, which is suitable for wading by adults. This will enable access to the building by emergency services personnel, if required and/or to evacuate people from the Site<sup>10</sup>.”* While this level of hazard may be below the recommended working limit for trained adults<sup>11</sup>, it is unacceptable as a primary response strategy to expect SES personnel to wade through flood water. NSW SES has historically attended incidents relating to flooding, including people trapped in vehicles along Turton Road and flooding on Monash Road.

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.

**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. We are aware of proposed development in the Broadmeadow area immediately adjacent. Consideration should be given to the cumulative impact of the new development.

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 risks associated with Low 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.

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<sup>10</sup> Torrent Consulting, 2024, Hunter Indoor Sports Centre Flood Emergency Response Strategy, Section 2.5 Evacuation Routes and Flood Refuges, Page 13

<sup>11</sup> Department of Planning and Environment, 2023, FB03 Flood Hazard, Figure 2 Thresholds for the stability of people in floods, Page 8

There is no known safe period of isolation, however, the longer the period of isolation, the more chance there is for mishap requiring external intervention. 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. During flooding it is likely that there will be a reduced capacity for the relevant emergency service agency to respond in these times.

**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.**

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. However, it is important to note that 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.

Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response operations.