

Our Ref: ID 3537
Your Ref: SSD-67105475

31 December 2025

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CC: joshua.stanbury@ses.nsw.gov.au

Dear Nicholas,

Environmental Impact Assessment Romani Battery Energy Storage System SSD-67105475

Thank you for the opportunity to provide advice on the State Significant Development Application for EIS Romani Battery Energy Storage System located north of Booroorban-Tchelery Road, Booroorban. It is understood that the proposed development involves the construction, operation and decommissioning of the Romani battery energy storage system (BESS) and associated infrastructure.

We have reviewed the following documents provided as part of the preparation of our advice:

- ERM, 2025. Romani Battery Energy Storage System Environmental Impact Assessment.
- ERM, 2025. Romani Park Battery Energy Storage System Environmental Impact Assessment Appendix A SEARS Table.
- ERM, 2025. Romani Park Battery Energy Storage System Environmental Impact Assessment Appendix O Surface Water Impact Assessment.
- ERM, 2025. Romani Battery Energy Storage System Environmental Impact Assessment Appendix B Detailed Maps and Plans.

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.

We note the proposal has not considered flooding issues 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 circulars and directions under the *Environmental Planning and Assessment Act, 1979*, including PS24-001.

In summary, we:

- **Recommend** requesting the Surface Water Assessment to be updated to comprehensively address flood and isolation risks for the site. The update should consider key factors such as flood frequency, time to onset, hydraulic hazard, depth, velocity, and duration for events up to and including the Probable Maximum Flood (PMF), covering both the site and its access roads. Flood mapping should include clear legends and avoid overlapping polygons that obscure underlying risk information.
- **Recommend** ensuring any emergency management measures proposed are consistent with the existing emergency management arrangements.¹

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

- [Reducing Vulnerability of Buildings to Flood Damage](#)

Further information is contained in Attachment A. Please contact Gillian Webber 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 black ink, appearing to read 'Nicole Hogan', with a long horizontal flourish extending to the right.

Nicole Hogan
Assistant Commissioner, Director Emergency Management
NSW State Emergency Service

¹ NSW Government. 2023. Flood Risk Management Guideline EM01: Support for Emergency Management Planning.

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline²

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 strategies identified in the NSW State Flood Plan³ and the Murray River Local Flood Emergency Sub Plan⁴, 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.

Further, 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. Climate change should also be considered.

The site itself is prone to shallow flooding in a 1% AEP, with depths of up to 50mm. The flood hazard in the Project Area is up to H3 in a PMF which is unsafe for vehicles, children and the elderly.⁵ The access roads appear to be significantly impacted by frequent flooding; however, this has not been adequately addressed in the provided Surface Water Assessment⁶. We recommend requesting the Surface Water Assessment to be updated to include information on flood and isolation risks on the site, including frequency, time to onset, hydraulic hazard, depth, velocity and duration of flooding for flood events up to and including the Probable Maximum Flood for the site itself and the access roads. The mapping included in the main body of the report and the appendix is not sufficient to depict the flood risk and should have clear legends and not have overlaying polygons that restrict the assessment of the underlying flood risk.

We note several mitigation measures have been proposed to reduce the potential risks of flooding, including minimise filling and the extent of the project infrastructure within the 1% AEP flood, locating permanent ancillary infrastructure above the 1% AEP plus 0.5m freeboard, early warning and communication protocols.⁷

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

² NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

³ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

⁴ NSW SES. 2023. Murray River Local Flood Emergency Sub Plan

⁵ ERM, 2025. Romani Battery Energy Storage System Environmental Impact Assessment, page 13.

⁶ Engeny. 2025. ERM Romani BESS Surface Water Impact Assessment.

⁷ Engeny. 2025. ERM Romani BESS Surface Water Impact Assessment. Page v and vi

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 risks associated with flooding 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.

Current evidence suggests that flood events will become more frequent due to climate change. A Climate Change Calculator has been developed to address the updated ARR climate change guidelines⁸ recommending the adjustment of the BoM 2016 IFDs to account for the warming that has occurred since the mid-point of the data used for their development (1961-1990). This results in a significant increase in existing conditions flood levels.⁹ For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.

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.

⁸ Wasko et al. 2024. A systematic review of climate change science relevant to Australian design flood estimation. Hydrology and Earth System Sciences. 28: 1251-1285

⁹ Babister et al. 2024. Climate Change Calculator: Estimating Changes to Flood Probability Under Different Climate Change Scenarios, page 1

As the site is subject to local creek flooding, there is little to no warning time available for the community 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.

Development within a floodplain will necessitate ongoing involvement from the NSW SES in community awareness, preparedness, and response activities. It is essential that all site users, both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life. This includes:

- Raising awareness of flood risk
- Strengthening community connections
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills