

Our Ref: ID 3712  
Your Ref: SSD-79747209

1 April 2026

Rita Hatem  
Department of Planning, Housing & Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

Via Major Portal

email: [Rita.Hatem@planning.nsw.gov.au](mailto:Rita.Hatem@planning.nsw.gov.au)  
CC: [phil.petersen1@ses.nsw.gov.au](mailto:phil.petersen1@ses.nsw.gov.au)

Dear Rita,

**State Significant Development Application for Garoo Solar Farm (EIS)**

Thank you for the opportunity to provide advice on the State Significant Development Application for Garoo Solar Farm, 291 Garoo Road, Garoo. It is understood that the proposed development involves the construction, operation, maintenance and, where relevant, decommissioning of a solar farm and associated infrastructure, including:

- Solar array with an estimated capacity of 133.76 megawatts (MW) alternating current.
- Electrical reticulation infrastructure, including a centralised large scale Battery Electric Storage System (BESS) with a storage capacity of 360MW / 1,440 Megawatt hours.
- Permanent associated and ancillary infrastructure.
- Temporary construction facilities including a temporary workers camp including accommodation for up to 250 workers.

The development is expected to result in **10 Full Time Equivalent (FTE) staff** during operation.

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

- ERM, 2026, Environmental Impact Statement
- Engeny, 2025, Water Resources Impact Assessment,

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.

We recommend flooding issues are considered 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 4.1 Flooding and PS24-001.

The flood modelling indicates that flooding through the Project Area is typically confined to Tamarang Creek and Sugarloaf Creek in the east with broader flow paths flowing through the western portion of the Project Area.

In summary, we:

- **Recommend further consideration is given to the safety people on the site** during both the construction and operation phases, prior to consent, in order to fully understand the risk including:
  - an analysis of flooding impacts on access/egress roads should be undertaken in an updated FIRA, including frequency and duration of inundation, flood depths at the road closure points and any isolation risks for the site as a result. Evacuation must not require people to drive or walk through flood water.
  - Should a shelter in place strategy be proposed, we recommend the proposal demonstrates consistency with the [Shelter-in-Place Guideline](#), to ensure the risk to life can be adequately managed and/or mitigated.
- **Recommend** considering flood resilience of the solar farm infrastructure which is likely to be damaged by flood water in events up to and including the PMF or located in areas of less risk, where feasible, to minimize risk to property, infrastructure and financial losses.
- **Recommend** site design and stormwater management that minimises any risk to workers and the community. Any improvements that can be made to reduce flood risk will benefit the current and future community.

You may also find the following Guidelines 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,

A handwritten signature in grey ink, appearing to read 'P. Cinque', is positioned below the closing 'Yours sincerely,'.

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

## **ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>1</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 strategies identified in the NSW State Flood Plan<sup>2</sup> and the Tamworth Regional Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.<sup>3</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.

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 contains 34 ephemeral creek lines running into Sugarloaf creek which flows in a northerly direction along the sites western border and Tamarang Creek which flows through the centre of the project area.<sup>4</sup> During the PMF, flooding reaches depths in excess of 0.5<sup>5</sup> metres and reaches Hazard Level 6 (H6).<sup>6</sup> This level of hazard is unsafe for all people and vehicles with buildings at risk of structural failure. Additionally during the PMF event the proposed workers camp location is partially inundated to depths up to 0.5 metres.<sup>7</sup> As outlined in the FIRA the flood impacts on the proposed infrastructure are expected to be minimal, with further mitigation measures to be included in the detailed design stage.<sup>8</sup> We

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<sup>1</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>2</sup> NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

<sup>3</sup> NSW SES, Tamworth Regional Flood Emergency Sub Plan, Endorsed November 2023, Section 5.8

<sup>4</sup> Engeny, November 2025, Water Resources Impact Assessment, Section 2.2.2 Local Systems, Page 21

<sup>5</sup> Engeny, November 2025, Water Resources Impact Assessment, Figure C3: Developed Conditions – PMF Peak Flood Depth, Page 117

<sup>6</sup> Engeny, November 2025, Water Resources Impact Assessment, Figure C9: Developed Conditions- PMF Flood Hazard Categorization, Page 123

<sup>7</sup> Engeny, November 2025, Water Resources Impact Assessment, Figure 5.3 PMF Baseline Flood Depth at Workers Accommodation Camp, Page 82

<sup>8</sup> Engeny, November 2025, Water Resources Impact Assessment, Section 5.1.3.2 Ancillary Infrastructure, Page 77

recommend pursuing site design and stormwater management which reduces the risk to workers and the community, as well as considering the infrastructure which may be at risk of damage or contamination as a result of flooding.

While the operational staff numbers are limited, at approximately 10 FTE jobs, during the construction phase the site will provide a workspace and temporary housing for up to 250 workers. We recommend the impacts of flooding on workers in the site is fully considered prior to consent being granted including an analysis of flooding impacts on access/egress roads should be undertaken in an updated FIRA, including frequency and duration of inundation, flood depths at the road closure points and any isolation risks for the site as a result. Evacuation must not require people to drive or walk through flood water.

Should a shelter in place strategy be proposed, we recommend the proposal demonstrates consistency with the [Shelter-in-Place Guideline](#), to ensure the risk to life can be adequately managed and/or mitigated.

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

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.

**Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.**

Managing flood risks associated 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.

**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.**

As the site is affected by ephemeral creeks, there is little to no warning time available prior to the onset of flooding and therefore limited 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.**

Development within a floodplain will necessitate ongoing involvement from the NSW State Emergency Service (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
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Importantly, a private flood management plan is insufficient to address flood risk.