

Our Ref: ID 3917
Your Ref: SSD-76008209

16 July 2026

Megan Ramsdale
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via email

email: megan.ramsdale@planning.nsw.gov.au
CC: joshua.stanbury@ses.nsw.gov.au

Dear Megan,

Comet Park Battery Energy Storage System (EIS)

Thank you for the opportunity to provide advice on the Environmental Impact Statement for Comet Park Battery Energy Storage System, located on part of Lot 763, DP 257321 (the Project Area) in Leeton Shire Local Government Area (LGA), approximately 1.5 kilometres (km) south-west of Yanco.

It is understood that the proposal seeks to develop the 4.8 hectare (ha) Project Footprint, located within a 53-ha Project Area, and would accommodate 136 BESS container units, 60 bi-directional inverters, one 180 MVA high-voltage transformer and skid-mounted medium-voltage transformers. Supporting infrastructure would include transmission lines, permanent switch rooms, a control building, operations and maintenance (O&M) facilities, a site office, internal roads, parking areas, hardstand, security fencing, and project signage. During its 18–24-month construction phase, it is projected to support **61 direct full-time equivalent (FTE) jobs**, peaking at around 45 FTE roles.

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

- Umwelt, 2026. Comet Park Battery Energy Storage System Environmental Impact Statement
- Umwelt, 2026. Comet Park Battery Energy Storage System Appendix 13 Water Resources Impact Assessment
- Umwelt, 2026. Comet Park Battery Energy Storage System Appendix 5 Summary of Management and Mitigation Measures
- WRM, 2026. Comet Park BESS Project Water Resources Impact Assessment
- Samsa Consulting, 2026. Comet Park BESS Project: Yanco Transport Impact Assessment

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 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 Planning Circular [PS 26-001 Flooding and land use planning](#).

NSW SES notes that while the EIS includes a preliminary assessment of flooding, the information provided is currently insufficient to demonstrate that flood risk, flood-related isolation and emergency management considerations have been fully assessed. In particular, further information is required to understand the flood behaviour affecting the site and surrounding road network, including River Road, across the full range of events up to and including the Probable Maximum Flood (PMF).

In summary, the NSW SES:

- **Recommend** requesting additional information with regards to flooding including consideration of:
 - flood risks at the site and access/egress roads (including any internal roads and the broader road network) from the full range of flooding events, up to and including the PMF event.
 - any risk of isolation and the duration of inundation. The impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand any evacuation constraints and ensure that people are able to evacuate the site to a safe area above the PMF level, before complete inundation of the site occurring. This is particularly important as this is a flash flood environment.
 - climate change impacts, in line with NSW Government guidelines.
- **Recommend** the flood assessment be used to inform appropriate flood mitigation and emergency management measures for the site. This includes considering site design, layout and stormwater management approaches that reduce flood impacts, enhance infrastructure resilience, minimise risks to people and property, and reduce potential flood-related damage and disruption. Where relevant, sensitive infrastructure (such as battery storage systems, inverters and other critical assets) should be located and designed to minimise exposure to flooding and reduce the risk of property damage and financial loss.

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

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

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

Please feel free to 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 dark ink, appearing to read 'P. Cinque', is positioned above the printed name.

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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹

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 Plan² and the Leeton Shire Local Flood Emergency Sub Plan³ 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. 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% Annual Exceedance Probability (AEP) flood. Climate change should also be considered, in line with NSW Government guidelines.

The site is situated within a relatively flat agricultural landscape and region comprised of a network of artificially constructed irrigation channels. No natural watercourses have been observed as transecting the development site, however, there are artificial irrigation channels within the site and in the surrounding region. Drainage and flow regimes in proximity to the development site are predominantly influenced by natural depressions.

We further note that the access road, River Road, is impacted by floodwater before the 1% AEP flooding. However more frequent events were not modelled to understand if the site becomes isolated prior to inundation, and neither were modelled higher magnitude event to understand the full extent of the flood risks to life and property at the site.

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. It is not to be impacted on by the cumulative impact of new development.

¹ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

² NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

³ NSW SES. 2023. Leeton Shire Local Flood Emergency Sub Plan

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 flood risks 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.

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. The nearest flood warning gauge is located at Narranderra, however warnings relating to this gauge will not incorporate the local sheet flooding that may occur on the Site.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.