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Your Ref: SSD-78247462

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

Via Major Portal

email: megan.ramsdale@planning.nsw.gov.au
CC: Amanda.pollock@ses.nsw.gov.au

Dear Megan,

Canyonleigh Battery Energy Storage System (EIS)

Thank you for the opportunity to provide advice on the Environmental Impact Statement for Canyonleigh Battery Energy Storage System (BESS), 962 Canyonleigh Road, Brayton. It is understood that the proposed development involves the construction, operation, maintenance and decommissioning of a BESS and associated infrastructure, including:

- A large-scale BESS with a storage capacity of up to 300MW / 1,200 MWh.
- Electrical reticulation infrastructure, including an onsite substation, switching station and internal transmission and feeder lines.
- Permanent associated and ancillary infrastructure.
- A maximum of five workers on-site periodically during operation and approximately 100 full-time equivalent jobs during the peak of construction.

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

- ERM, 2026, Environmental Impact Statement
- Engeny, 2026, 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 note the proposal has 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 4.1 Flooding and Planning Circular [PS 26-001 Flooding and land use planning](#).

Parts of the site, within existing flowpaths, become inundated as frequently as the 5% Annual Exceedance Probability (AEP) flood.¹ During the Probable Maximum Flood (PMF) event flooding within the site remains largely contained within these flowpaths, reaching depths of up to 3 metres² and Hazard Level 5 (H5).³ This level of hazard is unsafe for all people and vehicles. While the proposed development is largely outside these flowpaths the site becomes isolated as frequently as the 5% AEP event, due to Canyonleigh Road becoming inundated on either side of the site restricting access/egress.

In summary, we:

- Recommend any flood emergency management plan for the site includes the **early closure of the site and evacuation of any personnel** on site early in advance of the site becoming isolated to **reduce the exposure of people to high hazard flooding and minimise risk to life**.
- Emphasise NSW SES does not have authority to endorse or approve private Flood Emergency Response Plans, however we recommend that it is regularly exercised, clearly communicated, and periodically reviewed to ensure it remains current, practical, and effective and aligns with contemporary emergency management arrangements documented in the Local Flood Emergency Sub Plan. It should also include clear triggers for site closure, be self-sufficient and place no additional burden on NSW SES.

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 should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be

¹ Engeny, 2026, Water Resources Impact Assessment, Figure B1 Existing Conditions 5% AEP Flood Depth, Page 100

² Engeny, 2026, Water Resources Impact Assessment, Figure B5 Existing Conditions – PMF Flood Depth, Page 104

³ Engeny, 2026, Water Resources Impact Assessment, Figure B15 Existing Categories PMF Flood Hazard Categorisation, Page 114

interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,



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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁴

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 Plan⁵ and the Goulburn Mulwaree Flood Emergency Sub Plan, where evacuation is the preferred emergency management strategy for people impacted by flooding.⁶

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 is located approximately 250 metres east of the Wollondilly River and contains a number of non-perennial flow paths and streams as well as four existing farm dams.⁷ Parts of the site, within these flowpaths, become inundated as frequently as the 5% AEP flood.⁸ During the PMF event flooding within the site remains largely contained within these flowpaths, reaching depths of up to 3 metres⁹ and Hazard Level 5.¹⁰ This level of hazard is unsafe for all people and vehicles.

While the proposed development is largely outside these flowpaths the site becomes isolated as frequently as the 5% AEP event, due to Canyonleigh Road becoming inundated on either side of the site restricting access/egress. While the FIRA states *“Road cut locations 1 and 2 would likely remain trafficable during most modelled events (except the PMF) with hazard*

⁴ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

⁵ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

⁶ NSW SES, Goulburn Mulwaree Flood Emergency Sub Plan, Endorsed September 2021, Section 5.8

⁷ ERM, 2026, Environmental Impact Statement, Section 6.8.1 Surface Water, Page 161

⁸ Engeny, 2026, Water Resources Impact Assessment, Figure B1 Existing Conditions 5% AEP Flood Depth, Page 100

⁹ Engeny, 2026, Water Resources Impact Assessment, Figure B5 Existing Conditions – PMF Flood Depth, Page 104

¹⁰ Engeny, 2026, Water Resources Impact Assessment, Figure B15 Existing Categories PMF Flood Hazard Categorisation, Page 114

categorisations of H1 (generally safe for vehicles, people, and buildings) and H2 (unsafe for small vehicles)”¹¹ NSW SES does not support any strategy which requires people or vehicles to enter flood water regardless of the level of hazard.

We recommend any flood emergency management plan for the site includes the early closure of the site and evacuation of any personnel on site early in advance of the site becoming isolated.

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.

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 associated with High 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.

Principle 5 Risks faced by the itinerant population need to be managed.

¹¹ Engeny, 2026, Water Resources Impact Assessment, Section 4.5.2 Available Warning Times, Page 54

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.

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
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

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

Users of the proposed development should be made aware of their flood risk and be encouraged to use available tools and resources, including:

- [Hazards Near Me app](#) – part of the Australian Warning System, providing timely flood warnings
- [NSW SES website](#) – offering comprehensive guidance on flood preparedness, response, and recovery, including multilingual resources
- [HazardWatch](#) – an interactive platform for accessing real-time flood information and warnings