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Your Ref: SSD-77527735

2 July 2026

Pragya Mathema
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Parramatta NSW 2124

Via Major Portal

email: pragya.mathema@dpie.nsw.gov.au
CC: joshua.stanbury@ses.nsw.gov.au

Dear Pragya,

Mangoplah Battery Energy Storage System (RTS & Amendment Report)

Thank you for the opportunity to provide advice on the Amendment Report for State Significant Mangoplah Battery Energy Storage System, at 4178 Holbrook Road, Mangoplah, Wagga Wagga LGA. It is understood that the proposed amendments include:

- An increase of the Development Footprint on the southern side of the Holbrook Road site access of 0.51 hectares (ha) to facilitate a revised intersection geometry.
- A revised substation design layout with a 20-metre (m) asset protection zone (APZ).
- Relocation of Project infrastructure and APZ's to avoid the existing 132 kilovolt (kV) transmission line easement.
- The increase of daily heavy vehicle trips from 64 to 123 (inclusive of non-high-risk Over-size/Overmass (OSOM) and high-risk OSOM) during peak construction.

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

- NGH. 2026. Amendment Report – Mangoplah Batter Energy Storage System (V2)
- Cumulus Engineering. 2026. Flood Impact Assessment - Mangoplah Batter Energy Storage System (Version 008)

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](#).

We note the proposed project amendments and also refer to our meeting from 24 July 2025, and previous correspondence dated 31 July 2025 (reference ID3234) and 10 December 2025 (reference ID3511).

It is understood that the BESS is generally flood free for all events including the Probable Maximum Flood, limited to low hazard (H1) flooding in the northeastern corner of the BESS footprint.¹ However, there are access/egress constraints and the potential for flood isolation at the site, or site users driving through floodwaters noting that the proposed access **Route A** (via unnamed track to Paper Forest Creek and then Holbrook Road) is inundated by flood events as frequently as the 5% Annual Exceedance Probability (AEP) events, and becomes impassable for **up to 39 hours** during higher magnitude flood events.²

Access **Route B** (via an unnamed track to Paper Forest Road and then Zadows Road) provides access and egress during events up to the 1% AEP event.³ The updated Flood Impact Assessment (FIRA) included modelling of Route A only, however, Route B may provide improved flood resilience, and this should be investigated, including events below the 1% AEP to understand when roads first get cut.⁴

In summary, we:

- **Note and appreciate that** a project refinement has been made to the flood management approach as part of the updated Flood Impact Assessment (FIRA), as not to rely on access Route B.⁵ We recommend an assessment of any available access/egress routes under post-development conditions is undertaken, once the specific design details for access routes are finalised,⁶ to understand the flood immunity of the access/egress roads serving the site and understand what is the last opportunity to leave the site before access is cut.
- **Support and emphasise** the flood emergency management strategy for the site being the pre-emptive site closure to ensure all personnel are evacuated well before local watercourses rise to impassable levels.⁷

¹ Cumulus Engineering. 2026. Flood Impact Assessment - Mangoplah Battery Energy Storage System, Drawing: PMF Flood Hazard – Developed Conditions

² Cumulus Engineering. 2026. Flood Impact Assessment - Mangoplah Battery Energy Storage System, page 31

³ Cumulus Engineering. 2025. Flood Impact Assessment: Mangoplah Battery Energy Storage System, page 27 - 29

⁴ Cumulus Engineering. 2026. Flood Impact Assessment - Mangoplah Battery Energy Storage System, page 31

⁵ NGH. 2026. Amendment Report – Mangoplah Battery Energy Storage System, page 11

⁶ Cumulus Engineering. 2026. Flood Impact Assessment - Mangoplah Battery Energy Storage System, page 31

⁷ Cumulus Engineering. 2026. Flood Impact Assessment - Mangoplah Battery Energy Storage System, page 33

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 Ana Chitu 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 grey ink, appearing to read 'P. Cinque'.

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