



Your ref: SSD-62855708
Our ref: DOC25/358131

Sally Munk
Principal Planner
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy St,
Parramatta NSW 2150

29 May 2025

Subject: Waste Management Facility, Botany – SSD-62855708 – RTS

Dear Sally,

Thank you for your referral received 28 April 2025 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group of the Department of Climate Change, Energy and the Environment (DCCEEW) on the Response to Submissions (RTS) for this State Significant Development (SSD-62855708).

CPHR has reviewed the Submissions Report prepared by Element Environment (dated 23 April 2025) and the Flood Impact Risk Assessment (FIRA) prepared by CJ Arms (dated 11 April 2025) and provides its comments and recommendations at Attachment A.

Should you have any queries regarding this matter, please contact Theo Wilkinson, Senior Conservation Planning Officer via theo.wilkinson@environment.nsw.gov.au.

Yours sincerely,

Louisa Clark
Director, Greater Sydney
Regional Delivery – Greater Sydney Branch
Conservation Programs, Heritage and Regulation Group

CPHR response on the RTS for Waste Management Facility, Botany – SSD-62855708

Flood risk management

In preparing this advice, CPHR has reviewed the following documents:

- Submissions Report – Element Environment – 23 April 2025
- Flood Impact Risk Assessment (FIRA) – CJ Arms – 11 April 2025.

While the updated FIRA and Submissions Report provided additional modelling and clarification of isolation durations, the FIRA does not adequately resolve all the key issues raised in CPHR's previous submission (dated 13 September 2024). The proposal does represent an improvement in flood risk management when compared to the previous land uses on the site.

The RTS confirms that the site:

- is rapidly inundated in the probable maximum flood (PMF) with no safe evacuation time
- may be isolated for more than 10 hours under the 5% and 1% annual exceedance probability (AEP) events
- cannot rely on additional fill to manage flood levels
- has limited drainage capacity due to surrounding infrastructure
- is vulnerable to worsening flood conditions under climate change.

Key assessment issues and recommendations

The consent authority should ensure it is satisfied that the risks associated with flood isolation during rare events are manageable. The proponent should consult further with the NSW State Emergency Service (SES) regarding evacuation feasibility and shelter-in-place strategies to support any proposed emergency arrangements.

The key issues outlined below require further consideration prior to determination.

1. Flood isolation and access

The revised modelling confirms prolonged isolation during more frequent flood events.

CPHR recommendation: The proponent should consider the operational implications of site closure, including communication protocols with staff and service providers.

Extent and timing: prior to determination.

2. Evacuation triggers

It is unlikely that flash flooding at this site can be forecast with sufficient lead time to enable safe evacuation.

CPHR recommendation: If evacuation is proposed, the proponent should develop triggers in consultation with the NSW SES.

Extent and timing: prior to determination.

3. Shelter in place

CPHR recommendation: If evacuation is not feasible, any shelter-in-place strategy must comply with the [Shelter in place guideline for flash flooding](#), which includes the requirement to demonstrate access to power, communication and safety for the full duration of isolation (potentially multiple days).

Extent and timing: prior to determination.

4. Climate resilience

While the proposed design includes freeboard to 2050, the [Understanding and Managing Flood Risk Guideline](#) (FB01) recommends planning to 2100 for long-term industrial uses.

CPHR recommendation: The proponent should outline how flood risk will be managed over the full lifecycle of the facility.

Extent and timing: prior to determination.

End of Submission