

Our Ref: ID 3064
Your Ref: SSD-62855708

12 May 2025

Sally Munk
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: sally.munk@planning.nsw.gov.au
CC: helen.slater@ses.nsw.gov.au

Dear Sally,

State Significant Development Application for Waste Management Facility, Botany

Thank you for the opportunity to provide comment on the State Significant Development Application for Waste Management Facility, 2-4 Hale Street, Botany. It is understood that the proposed development seeks to develop a construction and demolition waste management facility intended to run 24/7 operations. We note that the development project includes soft landscaping, a new hardstand, a purpose-built warehouse, office facilities and amenities, parking and two new crossovers.

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.

The NSW SES recommends that consideration of flooding issues is undertaken 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 directions under the *Environmental Planning and Assessment Act, 1979*.

We refer to previous correspondence dated 18 April 2024 and 24 September 2024 and meeting held on 26 March 2024. We note and appreciate the consideration of our previous advice and changes to the Flood Impact Assessment and offer the following additional advice.

In summary, we:

- **Recommend** changes to the Flood Emergency Response Plan noted as 'agreed' in the Submissions Report¹ including removal of references to AEP Events and the inclusion of actionable triggers, to be made to the plan itself.
- **Recommend** ensuring the proposed 20 minute time frame for evacuation is sufficient for personnel to evacuate to a flood free location. While the time required has been *"Based on evacuation time of 8 mins to evacuate 20 people by foot from the KLF facility in Camelia to a designated area in a fire drill we estimate a site evacuation time for Hale Street of 20mins for the same number of people given that this will involve getting into a vehicle and driving out"*² it should consider the time required to travel to a flood free location rather than just leaving the site, to avoid personnel becoming trapped on flooded roads.

You may also find the following Guidelines available 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 interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Elspeth O'Shannessy', with a horizontal line underneath.

Elspeth O'Shannessy
Manager Emergency Risk Assessment
NSW State Emergency Service

¹ Element Environment, 2025, Submissions Report, Table 4.11 SES Comments and Response, Page 74

² CJ Arms, 2025, Flood Impact Assessment, Section 10.2 Safety, Page 131