

Our Ref: 3251
Your Ref: SSD-48225958

31 July 2025

Cameron Ashe
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: cameron.ashe@dpie.nsw.gov.au
CC: amanda.pollock@ses.nsw.gov.au

Dear Cameron,

State Significant Development Application for Gundry Solar Farm

Thank you for the opportunity to provide comment on the State Significant Development Application for Gundry Solar Farm, at 961 Windellama Road, Gundry. It is understood that the proposed Gundry Solar Farm (the Project) development seeks to include the construction, operation, maintenance and decommissioning of an approximate 400 MWp solar farm and associated infrastructure including:

- Employment generation and the creation of approximately 400 jobs during the construction phase and two to four permanent staff during the operational phase.¹
- Approximately 740,740 solar panels bifacial flat plate solar photovoltaic (PV) modules each generating approximately 540 Watt (W) in single axis tracking arrangement with a maximum height of 5 m above ground level.
- A system of inverters and voltage step-up transformers positioned throughout the solar arrays.
- Onsite underground electrical conduits and cabling to connect inverter stations to the onsite substation to be built for the project.
- A lithium-ion BESS to store energy generated by the Project.
- An onsite switchyard, 33/330 kilovolt (kV) substation and ancillary infrastructure to connect the Project to the existing 330 kV transmission line. An additional transmission tower may be erected on the current line to accommodate the grid connection.
- Internal access tracks to allow for site maintenance.
- Site office and operations and maintenance building with parking for the operations team.
- Primary solar farm site access point from Windellama Road.

¹ Umwelt. 2022. Gundry Solar Farm Scoping Report, page 7

- Drainage line crossings if and where required to manage existing surface water flows (to be determined during further design development) and access points for construction purposes.
- Emergency access and egress points at select points on the project boundary.
- Perimeter security fencing, crossing gates, water tanks or dams, and access points to facilitate sheep grazing.

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.

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 our previous response dated 27 March 2025 with reference ID2965 and **appreciate the Project team being proactive in relation to the flood risk and considering the NSW SES advice in updating the Flood Impact and Risk Assessment (FIRA)**. We have reviewed the updated FIRA and Management and Mitigation Measures documents, and:

- **Support** the approach to implement early evacuation as the principal means of managing flood risk at the project site prior to evacuation routes into Goulburn being cut off by floodwaters,² noting that Bungonia Road gets cut in events potentially more frequent than the 20% Annual Exceedance Probability (AEP) event³ and the broader road network is constrained by flooding at multiple locations.⁴
- Note that the project includes construction and upgrade works to access and internal tracks, including watercourse crossings,⁵ we therefore **recommend considering** flood resilience of the road infrastructure servicing the site. Ideally, the access/egress routes (including any internal tracks) should provide rising road access where feasible without causing negative impacts. This is important to avoid people becoming trapped at the site due to localised flooding, which may impede and delay evacuation.
- **Recommend considering** closing the site down and postponing any maintenance works, if there is a risk of riverine flooding, on receipt of advice from the Bureau of Meteorology (BoM), or when other evidence leads to an expectation of flooding. During site works, check the BoM website prior to start of the workday for any Severe Weather Warnings that may impact this area. We note there are no official flood

² WRM. 2025. Updated Flood Impact and Risk Assessment, page 25

³ GRC Hydro. 2022. Goulburn Floodplain Risk Management Study and Plan, page 69

⁴ Ibid., page 38 - 40

⁵ WRM. 2025. Updated Flood Impact and Risk Assessment, page 21

warning systems currently in use for Wollondilly or Mulwaree Rivers flooding at Goulburn,⁶ therefore there may be no formal Flood Warning products and river level predictions from the BoM for this area.

Please feel free to contact our team 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,



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

⁶ GRC Hydro. 2022. Goulburn Floodplain Risk Management Study and Plan, page 74