

Our Ref: ID 3510
Your Ref: SSD-85372970

10 December 2025

Pragya Mathema
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

email: pragya.mathema@dpie.nsw.gov.au
CC: Joshua.stanbury1@ses.nsw.gov.au

Dear Pragya,

**State Significant Development Application for EIS Griffith Battery Energy Storage System
SSD-85372970**

Thank you for the opportunity to provide advice on the State Significant Development Application for EIS Griffith Battery Energy Storage System. The Project will involve the construction, operation and eventual decommissioning of a BESS and include a direct transmission connection to the Griffith Substation, and associated works. The BESS is proposed to be located opposite the Griffith Substation at the corner of Irrigation Way and Bob Irvin Road, Yoogali.¹

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 PS24-001.

In summary, we note the area is not subject to regional flooding from the Mirrool Branch Canal^{2 3}. The access and egress routes are potentially impacted by flooding. We recommend

¹ Cogency. 2025. RE: Lodgement of Environmental Impact Statement (EIS), Griffith Battery Energy Storage System (BESS), 15 Bob Irvin Road, Yoogali, New South Wales (SSD-85372970)

² HARC. 2025. Griffith BESS Hydrology Assessment

³ Torrent Consulting. 2021. Griffith Main Drain J and Mirrool Creek Mapping

updating the Hydrology Assessment to evaluate potential flood risks and impacts up to and including the PMF, incorporate climate change considerations, and identify and address any isolation issues.

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 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,



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 Griffith City Local Flood Emergency Sub Plan,⁶ where evacuation is the preferred emergency management strategy for people impacted by flooding.

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 Hydrology Assessment⁷ identifies the site is not at risk of regional flooding from Mirrool Branch Canal and associated drainage infrastructure. However, it is still unclear whether the site could be affected by larger events up to the PMF or whether flooding of access and egress routes may pose additional issues. We therefore recommend updating the Hydrology Assessment to evaluate potential flood risks and impacts up to and including the PMF, incorporate climate change considerations, and identify and address any isolation issues.

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

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. 2025. Griffith City Flood Emergency Sub Plan

⁷ HARC. 2025. Griffith BESS Hydrology Assessment

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 flooding 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.

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 State Emergency Service (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
- Strengthening community connections
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

Residents and 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