Our Ref: ID 3097
Your Ref: SSD-50505215

20 May 2025

Emma Mitchell
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via Major Portal

email: emma.a.mitchell@dpie.nsw.gov.au
CC: brendon.johnson@ses.nsw.gov.au

Dear Emma,

State Significant Development Application for Bullawah Wind Farm: Response to Submissions

Thank you for the opportunity to provide comments on the response to Submissions (RtS) for the Bullawah Wind Farm State Significant Development Application. It is understood that the proposed development is located 36km southeast of Hay and includes:

- Up to 143 wind turbine generators (WTGs)
- A battery energy storage facility.
- Permanent ancillary infrastructure including internal roads, hardstands, main and collector substations, switchyards, operations and maintenance facilities, underground and overhead electricity transmission lines and poles, telecommunications facilities and utility services, permanent meteorological masts and water storage tanks.
- Temporary facilities including a temporary workforce accommodation (TWA) camp, site offices, amenities, construction compounds and laydown areas, on-site borrow pits, rock crushing facilities, concrete or asphalt batching plants, minor 'work front' construction access roads, environmental management and monitoring and signage.
- Off-site road works, involving upgrades to the proposed local transport route and establishment of site access points for wind turbine components to be delivered to the Site.

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*. Some of the key considerations relating to emergency management are further detailed in Appendix A.

In summary, we:

- **Recommend** risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF), as well as climate change, and not focus only on the 1% AEP flood.
- **Recommend** pursuing, if relevant, site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements to flood resilience that can be made to reduce flood risk will benefit the community.
- **Recommend** incorporating flooding into the site emergency plan. Note that the NSW SES is not able to endorse or approve such plans, and do not support the use of such plans to manage a significant underlying flood risk.

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 Gillian Webber 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

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline[1]

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 Plan[2] and the Hay Shire Local Flood Emergency Sub Plan[3] 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.

The risk assessment regarding flooding is limited and 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.

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing flood risks 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.

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[1] NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

[2] NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

[3] NSW SES. 2023. Hay Shire Local Flood Emergency Sub Plan

Current evidence suggests that flood events will become more frequent due to climate change. A Climate Change Calculator has been developed to address the updated ARR climate change guidelines[4], recommending the adjustment of the BoM 2016 IFDs to account for the warming that has occurred since the mid-point of the data used for their development (1961-1990). This results in a significant increase in existing conditions flood levels.[5]

Principle 5 Risks faced by the itinerant population need to be managed.

An Emergency Management strategy needs to consider people visiting or working on site.

The NSW SES recommend incorporating flooding into the site emergency plan, which is consistent with the NSW SES plans listed in Principle 1 above. Please note that the NSW SES does not have the statutory authority to endorse private Flood Emergency Response Plans and evacuation plans nor does it have the resources to review and comment on private plans for individual businesses. However, we recommend that the plan includes clear actionable triggers, timeframes, actions, resources required and routes for evacuation.

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 in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response requirements.

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase. However, it is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.

Users of the proposed development should be made aware of their flood risk, the Hazards Near Me app (a tool to receive flood warnings as part of the Australian Warning System) and

[4] Wasko et al. 2024. A systematic review of climate change science relevant to Australian design flood estimation. *Hydrology and Earth System Sciences.* 28: 1251-1285

[5] Babister et al. 2024. Climate Change Calculator: Estimating Changes to Flood Probability Under Different Climate Change Scenarios, page 1

the NSW SES website which contains comprehensive information for the general community about what to do before, during and after floods as well as in-language resources and HazardWatch (NSW SES interactive information and warnings site).