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Your Ref: SSD-50725708

4 September 2025

Jess Watson  
Department of Planning, Housing & Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

Via email

email: [jess.watson@dpie.nsw.gov.au](mailto:jess.watson@dpie.nsw.gov.au)  
CC: [joshua.stanbury@ses.nsw.gov.au](mailto:joshua.stanbury@ses.nsw.gov.au)

Dear Jess,

### **State Significant Development Application for Dinawan Wind Farm**

Thank you for the opportunity to provide comment on the State Significant Development Application for Dinawan Wind Farm, located within the Murrumbidgee and Edward River LGAs and encompasses parts of Goolgumbra Road, Wilson Road, Fernbank Road, McLennons Bore Road, and Kidman Way. It is understood that the proposed development includes the installation, operation, maintenance and decommissioning of up to 200 wind turbine generators (WTGs) and associated infrastructure including:

- A network of up to 200 three-blade WTGs with a maximum blade tip height of 250m.
- Electrical connection system, collector substations and control rooms.
- Electricity transmission line infrastructure (above ground and underground), including infrastructure connecting the collector substations to the Dinawan Substation site.
- Temporary construction infrastructure, including workforce accommodation, construction compounds, site offices and amenities, concrete batching plants, construction materials storage including stockpiles, laydown areas, temporary meteorological monitoring masts (up to 200m high), water tanks, water and sediment management infrastructure, storage and parking areas and borrow pits.
- Permanent supporting infrastructure, including operation and maintenance infrastructure, hardstands, water tanks and up to 10 permanent meteorological monitoring masts (up to 200m high).
- Site access and internal access roads including access points from the public road network on Kidman Way, Fernbank Road, Goolgumbra Road and McLennons Bore Road.

- Road upgrades to facilitate the delivery of project infrastructure to the development corridor, including intersections away from the project area required for heavy vehicles under escort.

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

**In summary, we:**

- **Recommend** considering flood resilience of the infrastructure, which is likely to be damaged or contaminated by flood water, to events up to and including the Probable Maximum Flood (PMF). This could include placing any critical infrastructure such as substations, etc., above the PMF level, if feasible, to minimise risk to property, disruptions of essential services and financial losses.
- **Recommend** seeking further information regarding the duration of inundation during flood events, particularly for the PMF event when egress from the worker accommodation becomes unsafe for vehicles.<sup>1</sup>
- **Recommend** incorporating flooding into the site emergency plan, including the construction phase when workers are accommodated on site, and the operational phase. 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.
- **Recommend** closing the work site and securing materials in advance of flooding, such as on receipt of a Severe Weather Warning from the Bureau of Meteorology, to prevent people or materials from entering floodwater.
- **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.

You may also find the following Guidelines available on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)

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<sup>1</sup> EMM, 2025, Amendment Report, Appendix D.12 Flood Mapping Work Accommodation Facilities Pages 218-224

- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Kate Dawes via email at [rra@ses.nsw.gov.au](mailto: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<sup>2</sup>**

### **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,<sup>3</sup> the Murrumbidgee Council Flood Emergency Sub Plan<sup>4</sup> and the Edward River Flood Emergency Sub Plan<sup>5</sup> 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 site is traversed by a number of water courses<sup>6</sup> and is affected by flooding in the 1% Annual Exceedance Probability (AEP) event reaching depths in excess of 1 metre in isolated areas.<sup>7</sup> The areas surrounding the accommodation facilities are also identified as partially flood affected in the 1% AEP event to depths of up to 0.16 metres. During the Probable Maximum Flood (PMF) flooding in the area of the proposed accommodation reaches depths of 0.58 metres<sup>8</sup> and Hazard Level 3 (H3).<sup>9</sup>

We recommend incorporating flooding into the site emergency plan and closing the work site and securing materials in advance of flooding, such as on receipt of a Severe Weather Warning from the Bureau of Meteorology, to prevent people or materials from entering floodwater.

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<sup>2</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>3</sup> NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

<sup>4</sup> NSW SES, Murrumbidgee Council Flood Emergency Sub Plan, Endorsed October 2023, Section 5.8

<sup>5</sup> NSW SES, Edward River Flood Emergency Sub Plan, Endorsed October 2023, Section 5.8

<sup>6</sup> EMM, 2025, Amendment Report, Figure 6.9 Waterfront Land and Riparian Zones, Page 135

<sup>7</sup> EMM, 2025, Amendment Report, Figure 6.10a and 6.10b 1% AEP Flood Depth, Page 137

<sup>8</sup> EMM, 2025, Amendment Report, Table 6.23 Maximum Flood Depth at the Accommodation Facilities, Page 133

<sup>9</sup> EMM, 2025, Amendment Report, Table 6.24 Peak Flood Hazard at the Accommodation Facilities, Page 133

We further recommend seeking additional information regarding the duration of inundation during flood events, particularly for the PMF event when egress from the worker accommodation becomes unsafe for vehicles. Any emergency plan should include the construction phase when workers are accommodated onsite and address their ability to evacuate safely in the event of extreme flooding.

**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 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 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.

**Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.**

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) for the life-span of the development.