



Patrick Copas
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Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

2 October 2025

Subject: NEXTDC S4 Data Centre Horsley Park – SSD-63741210 – Amendment Report

Dear Patrick,

Thank you for your referral received 15 September 2025 requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group on the Amendment Report for State significant development SSD-63741210.

CPHR has reviewed the Revised Flood Risk Assessment Report (FIRA) (Taylor Thomson Whitting, 28 April 2025) and accompanying Flood Emergency Response Plan (FERP) (Taylor Thomson Whitting, 28 April 2025) and provides its comments and recommendations below and at Attachment A.

CPHR does not support the reliance on a private site-specific evacuation plan to manage risk to life. Notwithstanding, should the proponent consider that a private plan would assist in preparing for and responding to flooding, then CPHR has provided advice for consideration at Attachment A. Additionally, CPHR is satisfied that the revised FIRA has adequately addressed previous comments and advises that no further information is required.

CPHR request that it not be given a role in the conditions of approval unless agreed. Should you have any queries regarding this matter, please contact Peter Braga, Senior Conservation Planning Officer via peter.braga@environment.nsw.gov.au.

Yours sincerely,

Louisa Clark
**Director, Greater Sydney
Regional Delivery
Conservation Programs, Heritage and Regulation**

CPHR response on the Amendment Report for NEXTDC S4 Data Centre Horsley Park – SSD -63741210

CPHR has reviewed the following documents

- Revised Flood Risk Assessment Report (FIRA), Taylor Thomson Whitting, 28 April 2025
- Flood Emergency Response Plan (FERP), Taylor Thomson Whitting, 28 April 2025.

Flood risk management

<p>Site-specific flood response plans</p>	<p>The proposal should not rely on a private site-specific evacuation plan to manage risk to life. The NSW State Emergency Service (SES) does not consider these plans to be an effective measure to strategically and effectively manage emergency management (EM) risks to the community during flooding. Furthermore, the NSW SES does not have statutory authority to endorse such plans.</p> <p>Emergency management risks should be addressed through sound land use planning and flood risk mitigation. However, if the proponent considers that a private plan would assist in preparing for and responding to flooding, then CPHR provides the following advice for consideration:</p> <ul style="list-style-type: none"> • Bureau of Meteorology (BoM) Flood Warning Service: Section 7 of the FERP outlines emergency management triggers that rely on flood watches and warnings issued by the Bureau of Meteorology (BoM). However, the BoM does not provide a flood warning service for either the Reedy Creek or Ropes Creek catchments. <p>These are flash flood-prone, ungauged catchments, and the BoM typically only issues flood warnings for major river systems where sufficient monitoring infrastructure exists. Due to the rapid onset and localised nature of flash flooding in these areas, it is not feasible for the BoM to detect and provide timely warnings.</p> <p>Further information on the flood forecasting and warning services provided for by the BoM can be found in the publication Service Level Specification for Flood Forecasting and Warning Services for New South Wales (BoM, 12 August 2024).</p> <ul style="list-style-type: none"> • Role of NSW SES: The FERP suggests evacuation should be considered if the NSW SES issues action statements covering the site. However, the NSW SES has statutory authority as the lead combat agency for floods. Any directive issued by the NSW SES must be followed, regardless of site-specific decisions. • Scope of the Site Manager’s responsibilities: The FERP requires the Site Manager to determine whether evacuation or shelter-in-place is appropriate, based on their assessment of whether site access will be compromised in the coming hours. <p>This expectation is problematic, as the Site Manager is unlikely to possess the necessary training, expertise, real-time information, or situational awareness to make such decisions, particularly under time pressure during a flood emergency. Additionally, the FERP does not provide the Site Manager with clear, quantifiable triggers to guide emergency management actions.</p> <p>Given that the supplied FIRA has demonstrated that the site itself is not flood-prone, has access routes with relatively high flood immunity, and the risk of isolation is low, it may be preferable to limit the Site Manager’s responsibilities to collecting and</p>
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	<p>disseminating information to site occupants. Individuals can then make their own informed decisions about their response, provided these actions remain consistent with NSW emergency management arrangements and any directives issued by the NSW SES.</p> <ul style="list-style-type: none"> • Evacuation Drills: The Site Manager is responsible for coordinating flood evacuation drills. However, requiring flood evacuation drills may be overly onerous considering the low flood risks at the site. <p>Recommended action: The proponent is encouraged to prepare a site-specific action plan that aligns with the responsibilities outlined in the Fairfield City Local Flood Emergency Sub-Plan (Fairfield City Council and NSW SES, April 2023).</p>
Extent and Timing	No further response is required regarding revising the FERP, as preparation of a FERP remains at the discretion of the facility owner.
Revised Flood Impact and Risk Assessment Report	CPHR is satisfied that the revised FIRA has adequately addressed CPHR's previous comments and advises that no further information is required.
Extent and Timing	No response required.

End of Submission