

Your ref: PAW-297138 Our ref: DOC23/342628-17

Department of Planning and Environment 4 Parramatta Square 12 Darcy Street Parramatta NSW 2150

By planning portal

Dear Sir/Madam,

**Request for Advice –** A request for NSW Government agency consideration of application PAN-297138 at182 GERTRUDE STREET NORTH GOSFORD 2250 was submitted to BCD on 27 April 2023. The consent authority's reference number is DA 23/3021.

The development site is redevelopment of existing residential property and there are no biodiversity related comments

Biodiversity and Conservation Division (BCD) Floodplain officers have reviewed the provided flood report, water cycle management plan, stormwater design and council's referral notes from the pre DA meeting

BCD's recommendations are provided in **Attachment A** and detailed comments are provided in **Attachment B.** If you have any further questions about this issue, please contact Angela Halcrow, Senior Floodplain Management Officer, on 43204243 or at <u>huntercentralcoast@environment.nsw.gov.au</u>

Yours sincerely

Jos Mony

Joe Thompson Director Hunter Central Coast Branch Biodiversity and Conservation Division

5/5/23

Enclosure: Attachments A and B

## **BCD's recommendations**

## **182-186 Gertrude Street North Gosford**

- 1. Detailed analysis of true flow paths will be required to ensure that the subject development can be protected from overland flow entering the basement and habitable spaces. Overland flow paths will need to be incorporated in the development to ensure they do not contribute to additional nuisance flows offsite.
- 2. The "drains" model needs to be updated to correctly represent the onsite detention calculations provided to ensure that upgrade of the stormwater easement infrastructure is not required.
- 3. Matters raised by Central Coast Council in the pre DA assessment will need to be assessed by Central Coast Council to ensure that the development is consistent with Council's requirements in this area.

# **BCD's detailed comments**

## **182-186 Gertrude Street North Gosford**

## Flooding and flood risk

## 1. The provided overland flood study does not reflect observed low points at the site

The provided overland flood study has been prepared from a combination of LiDAR and site survey pre and post development. Inspection on site revealed that the roadway in this location is a split level road with significantly different flow paths at each level. This is not consistent with the flow paths predicted by the overland flow study.

The site is located near the top of a catchment and Council's flood information certificate indicates the site is impacted by overland flow but not encoded as a flood control lot. It is unlikely that the development will result in risk to life however design will need to ensure that overland flows are routed around the building and do not cause added nuisance to downstream properties or risk to property at the development site. The proposed development and access ramp significantly alters the existing low point in the service road which would currently be the main flow path

#### Recommendation 1

Detailed analysis of true flow paths will be required to ensure that the subject development can be protected from overland flow entering the basement and habitable spaces. Overland flow paths will need to be incorporated in the development to ensure they do not contribute to additional nuisance flows offsite.

# 2. The existing stormwater easement pipework is unlikely to be adequate to serve the development.

The stormwater design indicates that low points adjacent to the access ramp will be drained by a 375mm pipe. The development stormwater plan also shows 300 mm pipes, the 375mm pipe and a 150mmm pipe all connecting to the council easement pipework. The council easement pipework is a 375mm pipe. The inflow pipework size appears to exceed the capacity of the connection point and may lead to additional surcharge of council pipework and additional overland flows to downstream properties. An onsite detention system has been proposed to limit flows from the development however the water cycle management plan has not correctly assessed credit for the rainwater reuse. This may result in the system not achieving the designed decrease in flows.

### Recommendation 2

The "drains" model needs to be updated to correctly represent the onsite detention and calculation provided to ensure that upgrade of the stormwater easement infrastructure is not required.

# 3. The development has not addressed important matters raised in Councils pre DA assessment

Documents provided to BCD do not indicate that the proponent has adequately addressed Councils concerns in matters raised in the pre-development assessment including sewer relocation, waste management, overland flow management and building height envelopes. These significantly impact the viability of the architectural and stormwater plans provided

## Recommendation 3

Matters raised by Central Coast Council in the pre DA assessment will need to be assessed by Central Coast Council to ensure that the development is consistent with Council's requirements in this area.