



STATEMENT OF ENVIRONMENTAL EFFECTS

2 Blair Street, Moama

Remove existing transportable building. Install new transportable building for new community building (reception and managers residence).

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Executive Summary

This Statement of Environmental Effects has been prepared to support a Development Application for the replacement of the existing reception building at 2 Blair Street, Moama (Lot 1 DP 194449), within the existing BIG4 Moama Caravan Park. The proposed development seeks to upgrade essential operational infrastructure through the installation of a two-storey transportable building that will provide a modern reception, recreation area and staff facilities at ground level, and a manager's residence above.

This Statement of Environmental Effects proposes to:

- Remove the existing transportable building, currently used for the reception of the Caravan Park.
- Install a new transportable building, with the ground floor being for reception and staff amenities, and the first floor being for residential accommodation (the managers residence).
- Remove four non-native, planted Palm Trees to accommodate the new building

The land is bushfire prone, and a BAL assessment has been provided to support the replacement of the existing community building. The land is also flood prone, and an assessment against existing flooding controls in the LEP and DCP has been provided.

The development complies with relevant planning regulations, including the Murray Local Environmental Plan (LEP) 2011 and the Murray Development Control Plan (DCP) 2011, and will have minimal environmental, social, or economic impact.

The proposal is considered to be in the public interest by supporting a local business and contributing to the region's economic development via the provision of accessible visitor and tourist accommodation. It is recommended that Council approve the application subject to any reasonable conditions deemed necessary.



Site Description

The Site is identified at figures 1-3 below. Table 2 provides a summary of the key attributes of the site and surrounding locality.

TABLE 2: SITE ATTRIBUTES

SITE AREA	13316sqm
SITE DIMENSIONS	The site is irregularly shaped. It has a frontage to Blair Street of 19.22m, and a depth of 153m on its north-eastern boundary. The southern north-western boundary is 100sqm, and south-western is 207m.
CURRENT USE AND IMPROVEMENTS	Currently used as a holiday park with 66 short term Cabin and Caravan Sites, amenities and a managers residence. The cabins and caravan sites are leased to occupants on short term basis. The manager of the caravan park lives on site.
TITLE RESTRICTIONS	Nil
TOPOGRAPHY	Gentle slope towards the north east.
AVAILABILITY OF SERVICES	Site is connected to all required services including sewer, water and power.
ACCESS AND PARKING	Each caravan site has its own parking space. Shared parking is also available for 11 vehicles near the site entrance.
SURROUNDING LAND USES AND ZONING	To the east of the development site is residential development. To the north-east is commercial development, which fronts Meninya Street. To the west and south is vacant vegetated land associated with the Murray River.

Figure1 – The portion of the site subject to the application



Figure 2 – The Site



Figure 3 – Site Context





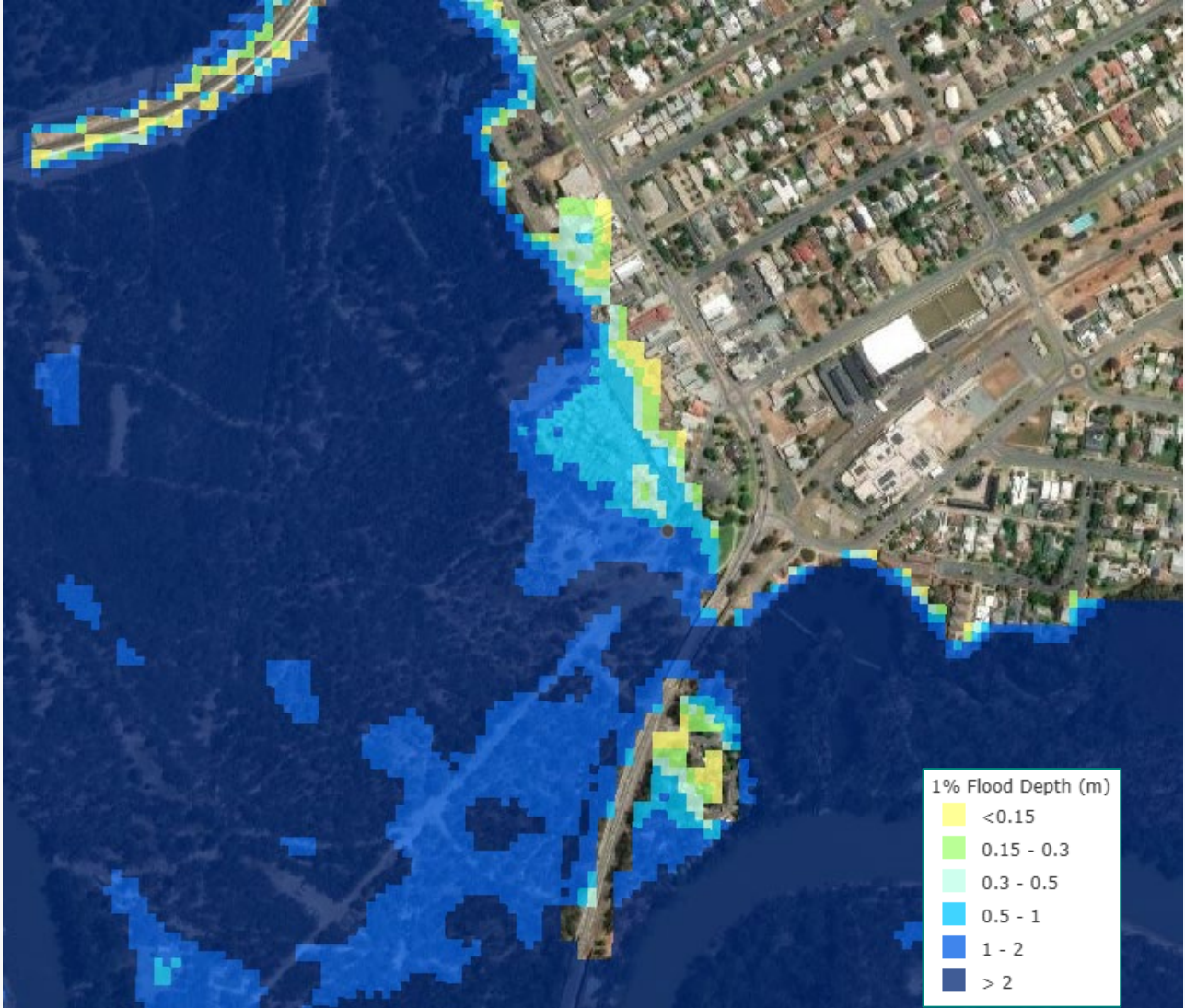
Planning Summary

Table 3 below summarises the key planning controls applicable to the Site and surrounding land.

TABLE 3: ZONING AND PLANNING CONSTRAINTS

ZONE	C3 – Environmental Management
MAXIMUM BUILDING HEIGHT	NA
MINIMUM LOT SIZE	120ha
FLOOR SPACE RATIO	N/A
CONSTRAINT MAPPING	N/A
FLOOD PRONE LAND	Yes – refer Figure 5
BUSHFIRE PRONE LAND	Yes – buffer zone

Figure 4 – Flood Mapping (Echuca Moama Torrumbarry Flood Study 2024)



Proposal

This Statement of Environmental Effects has been prepared to support a Development Application for the replacement of the existing reception building at 2 Blair Street, Moama (Lot 1 DP 194449), within the existing BIG4 Moama Caravan Park. The proposed development seeks to upgrade essential operational infrastructure through the installation of a two-storey transportable building that will provide a modern reception and staff facilities at ground level, and a manager's residence above.

In particular, the proposal comprises the following:

- Removal of existing transportable building which has a footprint of 133sqm.
- Installation of a two-storey transportable building, with a footprint of 216.4sqm.
- A dedicated reception area, with an attached recreation room for the use of visitors to the site at ground floor level.
- An outdoor deck area on the ground floor and a balcony for use of the residence on the first floor.
- Staff amenities, including a kitchenette, bathroom and office.
- A 3-bedroom managers residence on the first floor, with an open place living kitchen and balcony. The residence will be occupied by the owners and managers of the caravan park.
- Back of house area used for laundry and guest services.
- Removal of 4 non-native palm trees to accommodate the building.

One car parking space in the communal car parking area will be removed to accommodate the footprint of the new building, reducing available visitor parking to 10 spaces. No other changes to the broader Caravan Park are proposed.

Figure 5 – Ground floor

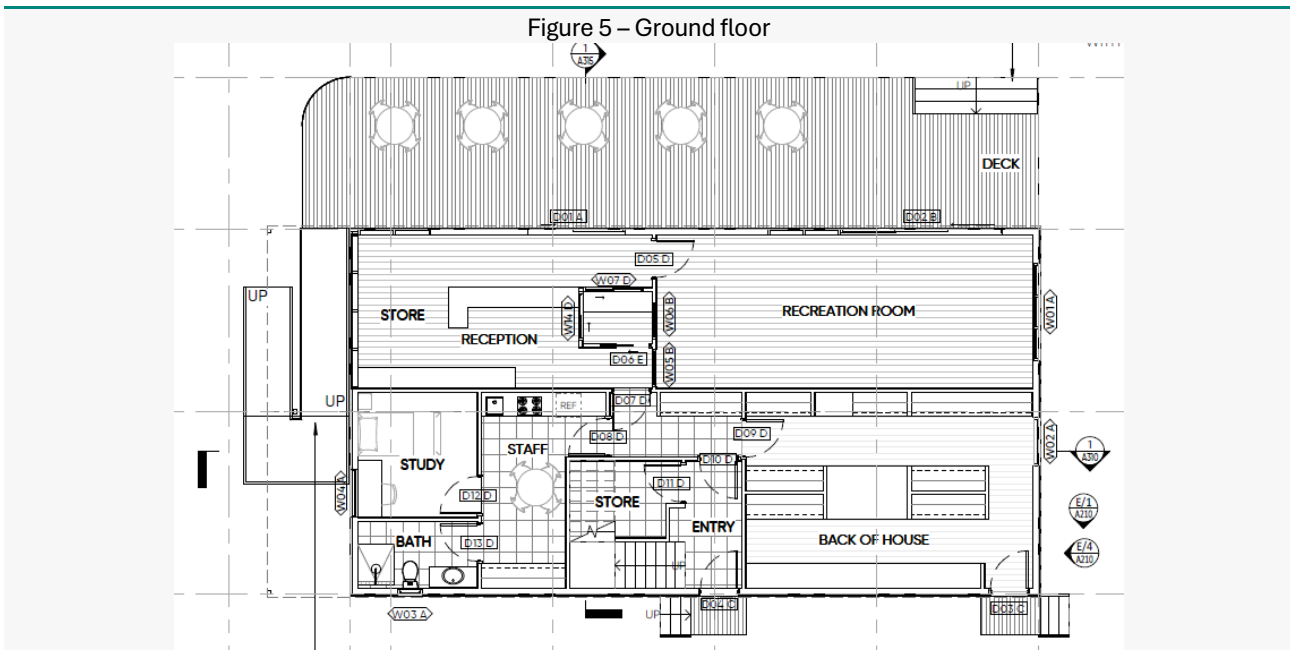
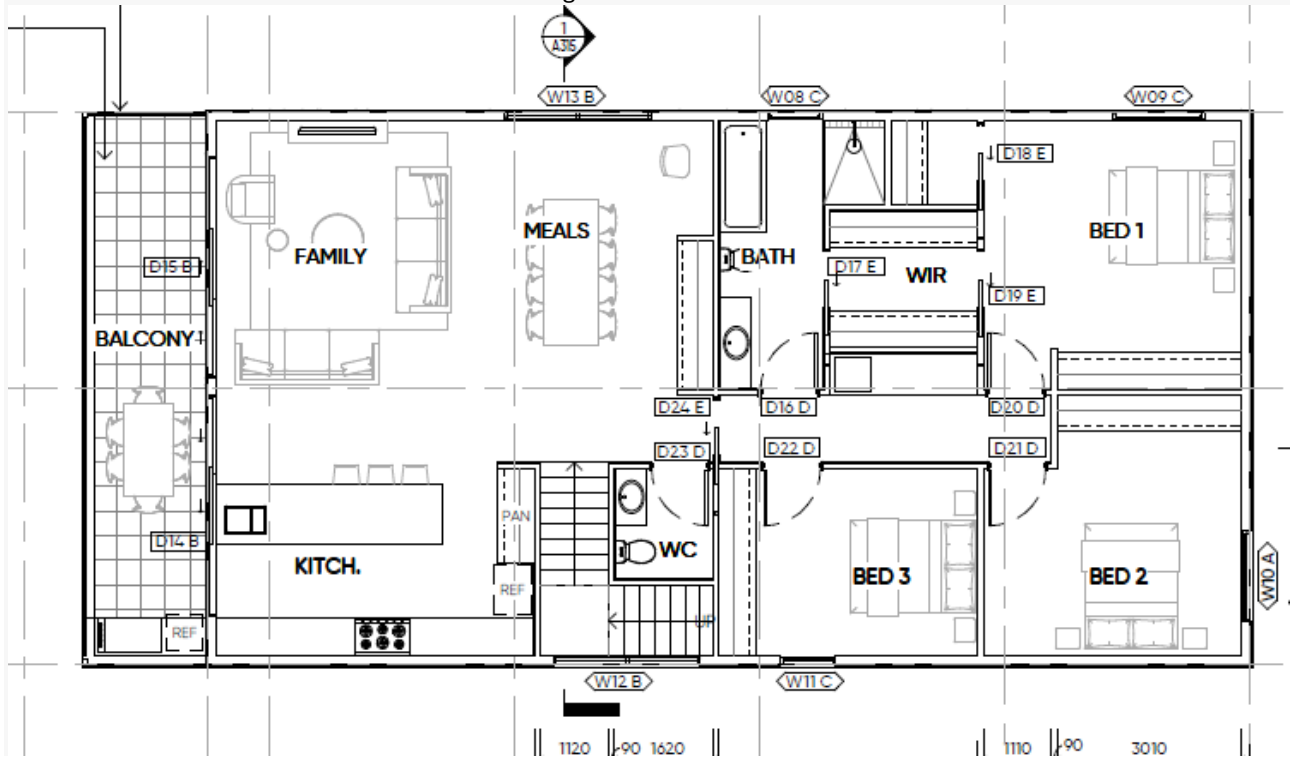


Figure 6 – First floor





Assessment

Environmental Planning and Assessment Act 1979

Section 4.14 Consultation and development consent—certain bush fire prone land

*(1) **Development consent cannot be granted for the carrying out of development for any purpose** (other than a subdivision of land that could lawfully be used for residential or rural residential purposes or development for a special fire protection purpose) **on bush fire prone land** (being land for the time being recorded as bush fire prone land on a relevant map certified under section 10.3(2)) unless the consent authority—*

*(a) **is satisfied that the development conforms to the specifications and requirements of the version (as prescribed by the regulations) of the document entitled Planning for Bush Fire Protection** prepared by the NSW Rural Fire Service in co-operation with the Department (or, if another document is prescribed by the regulations for the purposes of this paragraph, that document) that are relevant to the development (the relevant specifications and requirements), or*

(b) has been provided with a certificate by a person who is recognised by the NSW Rural Fire Service as a qualified consultant in bush fire risk assessment stating that the development conforms to the relevant specifications and requirements.

The site has existing use rights for the purpose of a Caravan park and the proposed new community amenities building replaces an existing community amenity building on site. A BAL assessment is provided with the application and bushfire protection measures confirmed on the proposed plans for the development.

It is understood that a Caravan park constitutes a Special Fire Protection Purpose Development (SFPP). It is unclear as to whether a bushfire risk assessment is triggered for the replacement of an existing community amenity building. Should a bushfire risk assessment be required, it is requested that Council request this as part of an information request. The applicant would utilise Council services for this assessment.

Division 4.11 Existing uses

The relevant zone is C3 Environmental Management. The development was approved as a *Caravan Park* under its original consent. Caravan Parks are prohibited in the C3 Environmental Management zone, by way of not being listed as permitted with consent. The use therefore relies on existing use rights under Division 4.11 of the *Environmental Planning and Assessment Act 1979*.

Clause 4.65 of the Act defines an existing use as:

(a) the use of a building, work or land for a lawful purpose immediately before the coming into force of an environmental planning instrument which would, but for this Division, have the effect of prohibiting that use, and

(b) the use of a building, work or land—



(i) for which development consent was granted before the commencement of a provision of an environmental planning instrument having the effect of prohibiting the use, and

(ii) that has been carried out, within one year after the date on which that provision commenced, in accordance with the terms of the consent and to such an extent as to ensure (apart from that provision) that the development consent would not lapse.

As the use has been in continuous operation since its commencement the Caravan Park is defined as an existing use.

Clause 4.66 of the Act states:

(1) Except where expressly provided in this Act, nothing in this Act or an environmental planning instrument prevents the continuance of an existing use.

Therefore, the development may continue operating and Council is able to consider this application.

Environmental Planning and Assessment Regulation 2021

Clause 164 Enlargement, expansion and intensification of existing uses

This clause states that development consent is required for any enlargement, expansion or intensification of an existing use. It also states that:

(2) The enlargement, expansion or intensification must be—

(a) for the existing use and for no other use, and

(b) carried out only on the land on which the existing use was carried out immediately before the relevant day.

The proposed new caravan site is for the existing use (being a Caravan Park) and is for the land in which the existing use is being carried out. Therefore, the proposal is permissible under the Regulations.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

The objective of this policy is to protect vegetation. Some non-native palm trees have been proposed to be removed to accommodate the proposal. The trees are not identified as biodiversity. A BMAT has been prepared, which has confirmed that a BDAR is not required.

Figure 7 – Palm Trees to be removed



Local Government Act (1993)

Section 68 of the Local Government Act states that approval from Council is required to operate a Caravan Park and to install Moveable Dwellings. The caravan park has already received a Section 68 approval to operate.

Part 3, Division 3 Caravan parks and camping grounds

Division 3 relates to matters Council must consider when approving a Caravan Park. This section provides an assessment against the relevant provisions of Division 3.

The regulation defines a **community building** as a building used or intended to be used in connection with a community amenity, including a building used as a manager's or caretaker's office or residence.

As the dwelling is proposed to be used as a manager's residence, the entire proposal is defined as a community building rather than a dwelling site for the purposes of the Regulation. Consequently, Only relevant clauses of the Regs relating to community amenities buildings have been considered.

Subdivision 1 Land and site requirements

The subject site of the caravan park as a whole is not proposed to change, and therefore this subdivision does not apply.

Subdivision 2 Setbacks



88 Setbacks for community buildings

Boundary setback

This clause allows for community buildings to be 3 metres from the boundary of the caravan park and 5m or more from the boundary of a dwelling site if the building will be “properly screened, fenced, enclosed or otherwise treated”. The building is proposed to be setback 5.5m from the northern side boundary.

The recreation room has been designed with no windows or openings facing the boundary, and a 1.8-metre-high fence is currently in place and will be retained. It is considered highly unlikely that the adjoining neighbour will be adversely affected by noise from the recreation room.

Openings on the remainder of the southern elevation include a small kitchen window, a light well serving the internal staircase, and a modest window to Bedroom 3. These spaces are not anticipated to generate significant noise or pose any unreasonable impact to the neighbour’s privacy.

The proposed 5.5-metre setback complies with the setback provisions outlined in the Development Control Plan (DCP) for two-storey buildings, which are intended to safeguard privacy and acoustic amenity for neighbouring properties. Accordingly, the setback is considered appropriate and reasonable in this context.

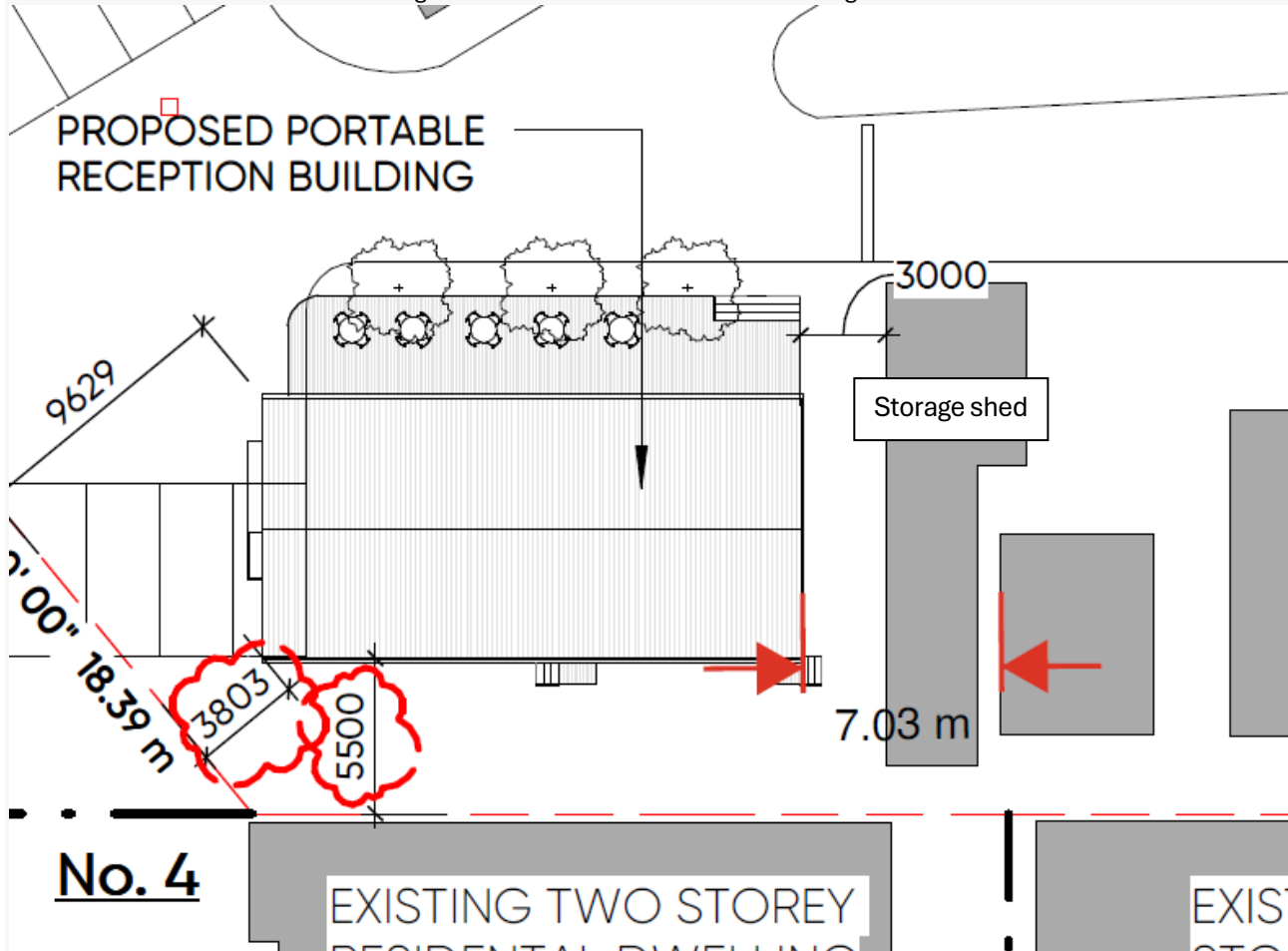
Setback from dwelling sites

This clause allows for community buildings to be setback 5m from dwelling sites if the building will be “properly screened, fenced, enclosed or otherwise treated”. The building is proposed to be setback 7m from the nearest dwelling site, with a shed in between the community building and the dwelling as per Figure 7.

This is considered appropriate as the storage shed will act as a buffer between the community building and the dwelling site. Further, there is only one window on the second floor of the building overlooking this dwelling site, which is a highlight window for Bedroom 2, significantly lowering any risk of privacy or noise impacts. All windows on the lower floor will not have a view to the nearby dwelling due to the placement of the shed. This shed will also dampen any potential noise issues and will act as an affective screen or treatment to maintain adequate separation and privacy.

Accordingly, a 7m setback to the nearest dwelling site is considered appropriate in this instance.

Figure 7 – Setbacks from shed and dwelling site



Subdivision 3 Roads

No changes to the internal road layout are proposed.

97 Visitor parking

The proposal includes the removal of one visitor parking space to accommodate the expanded footprint of the building. This clause requires 1 visitor parking space for every 20 short-term sites. The land has 66 short-term sites and therefore 3 visitor parking spaces are required. The site will continue to offer 11 visitor parking spaces, exceeding the requirement of this clause.

98 Visitor parking for people with disabilities

The building expansion will remove the existing accessible parking, and the applicant will dedicate a new parking spot for accessible parking. It is requested that this be dealt with via conditions of consent.



Subdivision 4 Utility Services

The site is fully serviced, including for water, sewer, electricity and stormwater. No changes to the internal layout of services is proposed.

Subdivision 5 Shower and toilet facilities

Not proposed to change as part of this application.

Subdivision 6 Laundry facilities

This clause requires for the site, based on 66 short-term sites:

- 2 washing machines
- 2 laundry tubs
- 1 clothes dryer
- 1 iron and ironing board

This will be provided for in the room marked 'back of house' in proposed plans of this proposal.

Subdivision 7 Management

No changes proposed.

Subdivision 8 General

No changes proposed.

Subdivision 9 Primitive camping grounds

Not proposed.

The new transportable building will be installed subject to approval under a separate Section 68 application.



Figure 8 – Approved Site Map



BIG4
HOLIDAY PARKS

Thank you for choosing BIG4
Moama Holiday Park as your
holiday destination!
"In the heart of Moama"



BIG4 Moama
Holiday Park



Murray Local Environmental Plan 2013

1.3 Zone objectives and land use table

The relevant zone is C3 Environmental Management. The development was approved as a *Caravan Park* under its original consent. Caravan Parks are prohibited in the C3 Environmental Management zone, by way of not being listed as permitted with consent. The use therefore relies on existing use rights under the *Environmental Planning and Assessment Act 1979*. This has been addressed above.

The objective of C3 Environmental Management is as follows:

- *To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values.*
- *To provide for a limited range of development that does not have an adverse effect on those values.*

The application complies with these objectives as it is for development related to an existing use on an already disturbed portion of land. No land with ecological, scientific, cultural or aesthetic values will be impacted by the proposal.

5.21 Flood Planning

This clause requires that Council is satisfied that the development:

IS COMPATIBLE WITH THE FLOOD FUNCTION AND BEHAVIOUR ON THE LAND	The proposal is to replace an existing building on flood liable land. The proposed uses on the ground floor of the building are non-habitable uses, being a reception, staff amenities and a recreation room. The 1% AEP flood height at this location is 95.50RL and the proposed finish floor level is approximately 96RL. This brings the development 500mm above the 1% AEP flood event. The development is considered to be compatible with the flood risk and function, particularly as the building replaces an existing building at the same location. The <u>Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021 - NSW Legislation</u> specifically contemplates and allows for the installation of moveable dwellings and associated structures on flood liable land at Part 3, Division 2, Subdivision 2, clause 75. Therefore, the proposal is considered an acceptable outcome at the site.
WILL NOT ADVERSELY AFFECT FLOOD BEHAVIOUR IN A WAY THAT RESULTS IN DETRIMENTAL INCREASES IN THE POTENTIAL FLOOD AFFECTATION OF OTHER DEVELOPMENT OR PROPERTIES	The footprint of the existing building is 133sqm, and the new building footprint is 216sqm. This constitutes a total increase in footprint of this building of 39%. However, the land is already significantly developed with cabins, with a total development area of conservatively 2500sqm



WILL NOT ADVERSELY AFFECT THE SAFE OCCUPATION AND EFFICIENT EVACUATION OF PEOPLE OR EXCEED THE CAPACITY OF EXISTING EVACUATION ROUTES FOR THE SURROUNDING AREA IN THE EVENT OF A FLOOD	(assuming 60sqm per cabin x 39 cabins + larger communal buildings within the park). Given the total footprint of all buildings on the development site, this development proposes an increase in footprint of only 3.3%. Therefore, the impact of the development on flood function and behaviour is expected to be negligible. The draft Echuca-Moama flood study states that “there is typically a <u>warning time of multiple weeks</u> before the Murray River peaks at Echuca due to upstream rainfall.” This provides sufficient time to safely evacuate the proposed residence in the event of a flood. It also ensures that evacuation routes can be used efficiently, with minimal risk of congestion due to the extended lead time available.
INCORPORATES APPROPRIATE MEASURES TO MANAGE RISK TO LIFE IN THE EVENT OF A FLOOD	The primary measure to manage risk to life in the event of a flood is that the residence is on the first floor of the building, well above the 1% AEP flood height of RL95.5. This means that if a resident is in the dwelling in the time of flood, the dwelling will not be inundated with flood waters. Further, there is ample warning time of several weeks leading up to a flood event. The site is fully serviced with sealed roads within metres of the main street of Moama. These are considered appropriate measures to manage risk to life in the event of a flood.
WILL NOT ADVERSELY AFFECT THE ENVIRONMENT OR CAUSE AVOIDABLE EROSION, SILTATION, DESTRUCTION OF RIPARIAN VEGETATION OR A REDUCTION IN THE STABILITY OF RIVERBANKS OR WATERCOURSES.	The development has sufficient separation from Murray River of over 400m and is to be located on an already developed portion of land. The proposal is therefore not expected to cause erosion, siltation or destruction of riparian vegetation or riverbanks.

5.22 Special flood considerations

This clause applies as the use is a caravan park which is defined as a *sensitive and hazardous development* under this clause.

Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered whether the development—

WILL AFFECT THE SAFE OCCUPATION AND EFFICIENT EVACUATION OF PEOPLE IN THE EVENT OF A FLOOD, AND	The draft Echuca-Moama flood study states that “there is typically a <u>warning time of multiple weeks</u> before the Murray River peaks at Echuca due to upstream rainfall.” This provides sufficient time to safely evacuate the
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<p><i>INCORPORATES APPROPRIATE MEASURES TO MANAGE RISK TO LIFE IN THE EVENT OF A FLOOD, AND</i></p>	<p>proposed dwelling in the event of a flood. It also ensures that evacuation routes can be used efficiently, with minimal risk of congestion due to the extended lead time available.</p> <p>The Caravan park is an existing established use at this location. The primary measure to manage risk to life in the event of a flood is that the dwelling is on the first floor of the building, well above the 1% AEP flood height of RL95.5. This means that if a resident is in the home in the time of flood, the home will not be inundated with flood waters.</p> <p>Further, there is ample warning time leading up to a flood event. The site is fully serviced with sealed roads within metres of the main street of Moama.</p> <p>These are considered appropriate measures to manage risk to life in the event of a flood.</p>
<p><i>WILL ADVERSELY AFFECT THE ENVIRONMENT IN THE EVENT OF A FLOOD.</i></p>	<p>The site is already fully disturbed, and the proposed building will be installed wholly on an existing development site. No storage of contaminating chemicals will occur. The proposed new office and managers residence will not affect the environment in the event of a flood.</p>

7.1 Essential Services

All essential services are available on the land, by virtue of the land already operating as a caravan park.

7.2 Earthworks

Any earthworks proposed would be minor in nature to ensure a flat building pad and would otherwise be exempt development.



Murray Development Control Plan 2013

Chapter 5 – Tourist Accommodation

Tourist accommodation will only be permitted where adequate potable water supply, both quality and quantity, is available, having regard to the proposed use of the site.

Complies. Potable water is available to the property, and the proposed building will not unreasonably increase demand.

It will also only be encouraged where provision of a reticulated sewerage system is available.

Complies. Reticulated sewer is available to the property.

Development that has the potential to have a detrimental impact on the natural landscape or environment will not be supported.

As demonstrated throughout this document, the proposed building will not have a detrimental impact on the natural landscape as it is proposed to be positioned in an already disturbed area.

The design and construction of caravan parks or camping grounds is to be in accordance with the provisions of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005.

The Caravan park is an existing, lawful use at this location. The proposed new structure replaces an existing structure at this location. The transportable building will be designed and installed in accordance with the *Local Government Regulation 2005*, subject to a separate Section 68 application.

The impact of the development on the natural environment and the means of protection to be employed against any potential effect

As demonstrated throughout this document, the proposed building will not have a detrimental impact on the natural landscape as it is proposed to be positioned in an already disturbed area.

The impact of the development on the built environment, the character of the area and significant places of heritage value;

The proposal is unlikely to impact the surrounding built environment or character of the area. The established building form in this part of Moama is predominately 1 storey buildings. However, directly adjacent to the block is an existing two storey dwelling house with a 0-setback from the shared boundary, and an 8m setback to Blair Street. Conversely, the proposed development has a 16m setback to Blair Street and a 6m setback from the side boundary.

Therefore, the proposed building will not be intrusive to the streetscape or existing building form of Blair Street.

There are no heritage items within the vicinity of the development.

The proximity and means of access to an urban centre and facilities

The site is within direct walking distance along a sealed road with a footpath of Meninya Street, the main street of Moama. The development site therefore has the support of adequate urban services and facilities.

Figure 9 – Distance of development site to Meninya Street



The impact of the development on adjoining land use activities and the amenity of nearby residents

The building is a two storey development, setback 5.5 metres from the neighbouring property to the north. By virtue of the development being south of their neighbours, it will not increase overshadowing onto the neighbouring properties. The development also complies with Councils residential development setback



requirements of 5m from side boundaries on lots greater than 4000sqm. The setback is therefore considered adequate to manage privacy and overlooking concerns onto the neighbouring properties.

The potential economic benefit

The proposed development, comprising a new reception area and manager's residence, will enhance the operational efficiency of the site. Upgraded reception facilities will improve visitor servicing, while the on-site manager's residence will support effective day-to-day management, contributing to the overall economic viability and long-term success of the development.

Provision of suitable of road access and egress

The existing access to the land is considered suitable as a fully formed and sealed vehicular access, and the proposal does not necessitate upgrades to the development site as it will not increase the vehicular movements to the land.

Provision of a potable water supply

Water is available to the land and the proposed development will not unreasonably increase use.

Provision of wastewater disposal facilities;

Sewer is available to the land and the proposed development will not unreasonably increase use.

The availability of telecommunication services; electricity

Telecommunications and electricity are available.

Natural hazards including flooding, bushfire or other risks to public safety and property;

The land is flood liable. However, the caravan park is already in operation and the proposal replaces an existing building at this location. The habitable portion of the building is located at first floor level, well above the 1% AEP. As discussed within the LEP section of this report, the proposal is considered acceptable taking into account the sites flood characteristics and the existing use of the land.

Landscaping including retention of existing vegetation and proposed planting.

Four planted palm trees are proposed for removal as part of the application, however the site will remain well landscaped.



Chapter 11 – Flood Prone Land

Pre lodgement advice was sought from Council regarding the application of Chapter 11 of the DCP to this development. Council provided advice to consider generally the Objectives and Decision Guidelines of the chapter, rather than the specific controls.

OBJECTIVE	RESPONSE
PROVIDE DETAILED CONTROLS AND CRITERIA FOR THE ASSESSMENT OF DEVELOPMENT APPLICATIONS ON LAND AFFECTED BY FLOODING IN MURRAY SHIRE	Noted, as advised by Council an assessment against the objectives and decision guidelines has been provided.
CONSOLIDATE EXISTING FLOOD PLANNING PRINCIPLES AND POLICIES FROM RELEVANT GOVERNMENT AGENCIES INTO A COHERENT FRAMEWORK FOR APPLICATION AT THE DEVELOPMENT CONTROL LEVEL BY MURRAY SHIRE COUNCIL	Noted
REDUCE THE IMPACT OF FLOODING AND FLOOD LIABILITY ON INDIVIDUAL PROPERTY OWNERS AND OCCUPIERS.	Complies. The proposed development is 500mm above the 1% AEP flood height. This means that the building will be wholly protected in the event of a flood.
REDUCE PRIVATE AND PUBLIC LOSSES RESULTING FROM FLOODING	Complies. The proposal replaces an existing building at this location. The floor level will be 500mm above the 1% AEP flood height. This means that the building will be wholly protected and will not result in any losses in the event of a flood.
RESTRICT THE INTENSIFICATION OF DEVELOPMENT BELOW THE FLOOD PLANNING LEVEL.	Complies, the development has a finished floor level 500mm above the 1% AEP flood height.
LIMIT DEVELOPMENT BELOW THE FLOOD PLANNING LEVEL TO THOSE ACTIVITIES AND WORKS CONSIDERED TO HAVE AN ESSENTIAL RELATIONSHIP WITH THE RIVER AND ITS FLOODPLAIN.	Complies, the development has a finished floor level 500mm above the 1% AEP flood height.
PROVIDE SPECIFIC MEASURES FOR THE CONTROL OF CARAVAN PARKS AND ASSOCIATED DEVELOPMENT TYPES WITHIN FLOOD AFFECTED AREAS.	The proposed development is for the replacement of an existing building, within an existing caravan park and will be used for business services and as a managers residence. The development is also 500mm above the 1% AEP flood height, and it is considered compatible with the flood affectation of the land.
PROVIDE FOR THE CONSIDERATION OF THE CUMULATIVE EFFECTS OF ANY DEVELOPMENT ON FLOOD AFFECTED LAND, WHICH IN OR OF	The proposed development is for the replacement of an existing building, within an existing caravan park and the new structure will be built above the flood planning level. The new structure only marginally



ITSELF MAY BE CONSIDERED TO BE INSIGNIFICANT	increases the existing developed footprint within the Caravan park and is expected to have a negligible affect on available flood storage at this site.
PROVIDE FOR AND PROTECT THE NATURAL PASSAGE, STORAGE AND QUALITY OF FLOOD WATERS	The proposal is to replace an existing building, and is therefore highly unlikely to result in any material change to the existing flows of floodwaters in this location.
RECOGNISE AND HELP SUSTAIN THE NATURAL ECOSYSTEMS OF FLOODPLAINS AND RIPARIAN ZONES.	The proposal relates to an already developed site. The proposal will not impact natural ecosystems or riparian zones.

Decision Guidelines

Whether the proposed development is reasonable having regard for the flood risk and resources available to the location. Applicants should place no reliance on the implementation of a condition specifying a private evacuation/flood management plan as a means to overcome an unacceptable flood risk.

The proposal seeks to replace an existing building. Importantly, the proposed building has been designed to mitigate flood risk through an elevated floor level, with the finished floor level at RL96.0, which is 500mm above the defined 1% AEP flood level of RL95.5. This exceeds standard freeboard requirements and ensures that critical components of the development, including the habitable areas (first-floor dwelling), are located well above the flood risk threshold.

The ground floor level of the building is non-habitable and the first floor development will be occupied by the managers of the park. This means that the occupiers will generally understand the flood risk and behaviour of Moama and receive evacuation alerts in line with other dwellings in the area.

The Echuca-Moama Flood Study identifies that the Murray River flood events typically allow for multiple weeks of advance warning. This provides a critical window for coordinated flood response measures, including safe evacuation via established and sealed road networks. While it is acknowledged that reliance on private evacuation or flood management plans is not considered an acceptable mechanism for addressing significant flood risk, in this instance, evacuation is not proposed as the sole mitigation measure. Instead, the design fundamentally avoids placing residents at risk by locating all habitable areas well above the modelled 1% AEP flood level.

Further, the site's proximity to existing urban infrastructure and services, including sealed road access within metres of the Moama town centre, ensures that emergency services can access the site without undue strain on local resources.



The need for a benefit/cost assessment that takes account of the full cost to the community of the flood response and flood damage likely to be incurred to the development and upon other development.

In considering the need for a benefit/cost assessment that accounts for the full cost to the community of potential flood response and damage, it is important to note that the proposed development replaces an existing building within an established and operational caravan park. The proposed building will support the ongoing operation of the caravan park, and therefore the tourist and visitor economy of Moama. The proposal does not introduce any additional tourist accommodation or population to the site and therefore does not intensify land use or increase the overall exposure of the community to flood risk.

The proposed building will accommodate a managers residence on the upper floor and business-related functions on the ground floor, including reception, staff amenities and a recreation space. The entire building is located above the 1% AEP flood level, with a finished floor level of RL96.0—500mm above the modelled flood level of RL95.5. This elevation exceeds standard flood planning controls and is consistent with flood-resilient development practice.

From a broader perspective, the proposed development contributes positively to the ongoing viability of the caravan park by upgrading aging infrastructure and supporting operational needs through improved on-site management facilities. Caravan parks play an important role in the local and regional economy, particularly in terms of affordable tourism and seasonal workforce accommodation. By investing in safer, more resilient infrastructure without increasing exposure to flood risk, the proposal strengthens the economic sustainability of the park while maintaining compatibility with the flood-prone nature of the site.

Specific principles relating to flood liable land contained within Murray Regional Environmental Plan No.2 - - Riverine Land (MREP2)

This LEP has been superseded. An assessment against the provisions of the *Murray Local Environmental Plan 2012* has been provided for in the LEP section of this report.



Matters for Consideration

Clause 4.15 of the *Environmental Planning and Assessment Act 1979* details the matters for consideration required to be used by a consent authority in determining a development application. These are addressed as follows;

(a) the provisions of—

(i) any environmental planning instrument, and

The provisions of the Murray LEP 2011 and applicable SEPP's have been addressed elsewhere in this report, with the proposal being identified as consistent with the provisions of these environmental planning instruments.

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

Not applicable. There is no draft EPI relevant to this application.

(iii) any development control plan, and

An assessment against the requirements of Murray DCP 2011 is provided in this document with respect to tourist and visitor development. The proposal is considered to be in accordance with the relevant objectives and controls of this DCP.

(iii) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and

Not applicable. There are no Planning Agreement relevant to this application.

(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),

The regulations are generally complied with.

(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,

The proposal is unlikely to result in any adverse environmental, social or economic impacts, as detailed in this Statement of Environmental Effects.



(c) the suitability of the site for the development,

The site is located in an existing Caravan Park. Whilst the land is flood liable, as discussed in this report the dwelling is proposed to be on the second floor and is therefore unlikely to unreasonably increase risk to the development site or occupants.

The land is also bushfire prone, and a BAL assessment has been prepared in support of the assessment. Bushfire Protection Measures have been confirmed on the plans.

As detailed throughout this report, the site is suitable for the proposed development.

(d) any submissions made in accordance with this Act or the regulations,

In the event that submissions are received, these would need to be taken into account in the assessment of this application.

(e) the public interest.

Given the nature of the proposed development, being a new reception area and managers residence for the existing caravan park, it is considered that the proposal would be unlikely to result in an unacceptable impact on the wider public interest at this location. The development is in the public interest as it will support the continued operation of an existing caravan park.



Conclusion

This Statement of Environmental Effects has been prepared to support a Development Application for the replacement of the existing reception building at 2 Blair Street, Moama (Lot 1 DP 194449), within the existing BIG4 Moama Caravan Park. The proposed development seeks to upgrade essential operational infrastructure through the installation of a two-storey transportable building that will provide a modern reception and staff facilities at ground level, and a manager's residence above.

A Bushfire Attack Level (BAL) assessment has been undertaken, and the design has responded appropriately to the identified risk. The site is located on flood-prone land; however, the development is sited above the 1% AEP flood level and has been demonstrated to be compatible with the flood characteristics of the area. The proposal does not intensify the use of the land or increase exposure to flood risk.

The proposed works are consistent with the planning controls and objectives of the Murray Local Environmental Plan 2011 and the Murray Development Control Plan 2011. The building footprint represents only a minor increase in the context of the broader developed site and will not result in unacceptable environmental impacts. The removal of four non-native palm trees is necessary to facilitate the development and will not result in loss of significant vegetation or biodiversity values.

From a broader perspective, the proposal supports the ongoing viability and safe operation of a well-established local tourism enterprise. Caravan parks such as BIG4 Moama provide accessible visitor accommodation and contribute meaningfully to the regional economy. The proposed development replaces ageing infrastructure with a flood-resilient, modern facility that supports long-term management of the park while improving staff functionality and visitor servicing.

The development will not result in any unreasonable environmental, social, or economic impacts, and is considered to be in the public interest. It is therefore recommended that Council grant consent to the application, subject to reasonable conditions of consent.