

21 August 2015

Dr Liz Develin
Deputy Secretary
The Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

PO Box R220
Royal Exchange NSW 1225
P+612 8016 0100
Email@insw.com
www.insw.com
ABN 85 031 302 516

Dear Dr Develin,

Thank you for the opportunity to comment on the Hawkesbury City Council Planning Proposal for General Amendments to Hawkesbury Local Environmental Plan (LEP) 2012 (Planning Proposal).

The Hawkesbury-Nepean Flood Management Taskforce is currently progressing the recommendations of the 2013 Hawkesbury-Nepean Valley Flood Management Review with the aim of improving the community's resilience to flood risk in the Hawkesbury-Nepean Valley (the Valley). The Hawkesbury City Council local government area (LGA) boundaries fall within the Valley. Some areas of the LGA are liable to riverine flooding from the Hawkesbury-Nepean River and are below the maximum flood level.

The Planning Proposal includes a proposed amendment (Item 3.3) to permit secondary dwellings and dual occupancies (detached) within all rural zones and E3 and E4 environmental zones subject to the Hawkesbury Local Environmental Plan 2012. The Taskforce recommends that consideration of this proposal be deferred pending the completion of the current phase of Taskforce work. The reasons for this recommendation are outlined below.

The 1997 *Achieving a Hawkesbury-Nepean Floodplain Management Strategy* and the Hawkesbury City Council's 2012 *Hawkesbury-Nepean Floodplain Risk Management Study and Plan* identified flood evacuation constraints in the Valley. Work completed by the Taskforce supports the identification of flood evacuation constraints in the Valley. Consequently, the need to improve the capacity of road infrastructure to provide adequate evacuation capacity is a key consideration for the Taskforce.

Currently, the time to safely evacuate the Windsor-Richmond population exceeds the Bureau of Meteorology forecasting horizon because of the extreme flood depths and rates of rise, increasing population and large number of low points in flood evacuation roads. The Planning Proposal acknowledges that 'emergency management and flood evacuation are significant issues in the Hawkesbury'. However, any further rezonings would further exacerbate the evacuation capacity issue.

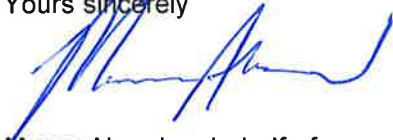
Proposals for additional development located below the probable maximum flood level require assessment of the cumulative impacts of the proposals on evacuation capacity now and following future growth. This assessment may identify the need for additional investment in evacuation infrastructure. It is important that this additional investment be quantified and suitable resources be allocated it. If this does not occur, there an increased risk to life if the increased development is not

matched with supporting evacuation infrastructure. This requires a regional approach to the assessment of the impact of development on evacuation capacity. The Taskforce is developing a process to understand and manage these cumulative impacts which will be considered by government towards the end of 2015.

Therefore, it is recommended that consideration of current planning proposals be deferred until the implications of its cumulative impacts on evacuation planning can be determined in light of the recommendations to be made by government.

If you have any questions please do not hesitate to contact Maree Abood at maree.abood@insw.com (phone: 02-8016-0167).

Yours sincerely



Maree Abood on behalf of
Mark Bethwaite AM
Independent Chair
Hawkesbury-Nepean Valley
Flood Management Taskforce