

Regional Town Planning Services ABN 99 112 194 519

Attention: Mr Bruce Ronan, Senior Landuse Planner, Integrated Planning General Manager Gosford City Council PO Box 21 GOSFORD NSW 2250

22 July 2013

Our ref: T1204

Dear Madam/Sir

Marana Road, Springfield Lot 3912 DP 1143985 Lot 416 DP 755227

This letter accompanies an amended planning proposal for the subdivision of two lots at Springfield. The amendments respond to Council's resolution, our meeting and your letter of 30 April 2013.

- The plan has been amended (see below) and has been separated onto two pages, to assist in providing clear details at A3 scale. Four copies are attached of each page.
- Carrying capacity: two reports were submitted to Council as part of the compulsory acquisition process of part of Lot 391 (parent of current Lot 3912):

* Don Fox Planning (DFP Planning Consultants), *Town Planning Report* to Establish the Underlying Zoning and Highest and Best Use of Lot 391 Deposited Plan 755227, Marana Road, Springfield March 2009 (prepared on behalf of the owners for Wilshire Webb Staunton Beattie Lawyers). This report concluded that prior to the acquisition, more than half the land suited a residential subdivision, with a further quarter of Lot 391 "may be included in the residential areas but not built upon", and about <2000 sq m at the northern boundary was "unsuitable for residential

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development". The yield would have been 4 residential lots of >720 sq m fronting Marana Road, two lots of >2112 sq m, with the remainder being attached to the existing dwelling's lot and with future residential development potential (Figure 10).

* Ludvik & Associates Pty Ltd, *Town Planning Report for Valuation Purposes, 61 Marana Road, Springfield* (prepared for Land and Property Information, Parramatta). This report concluded that prior to the acquisition, Lot 391 suited a 7 lot residential subdivision, and after the acquisition it suited a 2 lot subdivision (p. 27).

The current proposal is for an additional 4 lots on the post-acquisition land, with an additional lot on Lot 416 DP 755227. Note that Lot 3912 is already in two sections – north-east and south-west of the highway reserve (which is Lot 3911 DP 1143985).

 According to our 1:25000 LPI map (Gosford 9131-2S third edition), there is no watercourse in the development land on either lot. In relation to flooding, GEMS shows no flooding within about 1 km, with the nearest affected area being near Wells Street/ Willow Road (Attachment).

As a precaution, the interallotment boundary for Lots 123 and 124 is located roughly down the drainage line shown via contour mapping (Civil Directions' drawing 12G1326-01). In addition, the design of the building envelope boundaries on Lots 123 and 124 provides a large envelope on each, within which a dwelling might be feasibly located, with all required setbacks.

The envelope boundaries on Lot 124 are at or greater than 6m from any "top of bank". A garage footprint or entry way on Lot 124 might be located to the south-east of the eastern bank, which in future may have to be reconstructed to an engineer's design (subject to future structural assessment). A further amendment can be made to the building envelope in this area if required, however the detail of any future specific building design within the lot can also be controlled at a later stage. The building envelope has a generous size, despite the irregular shape. On Lots 122 and 123, there is also a shallower, artificial (and unengineered, landscaped) bank, which can also be designed around.

In relation to the potential for landscaping as a way of evaporating stormwater within each lot, acknowledgement is made that the development area defined by the bushfire report will have its vegetation managed to a specific standard (set by *Planning for Bushfire Protection*). The lots are generally managed to that standard now, so a significant increase in high-growing vegetation should not be anticipated. The same reasons apply to the use of high vegetation for nutrient control (DCP 165, S2.2). Stormwater disposal will therefore not be able to rely on evaporation or nutrient control through high vegetation: it will rely on detention, retention, ground infiltration and possibly nutrient control structures (which may have low-growing vegetation) to a future specific design for each lot. The future

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stormwater management plans will account for pre- and post-construction flows into the existing drainage line.

- Stormwater. A principle of WSUD is to reduce on-site built structures in order to provide a more natural drainage system, enhancing water quality, reducing runoff and flooding, enhancing the built and natural environment, and reducing potable water use (DCP 165, 2007, p. 3). The features of the Planning Proposal which will achieve this principle are as follows.
 - a) All 7 lots will host rainwater tanks for bushfire fighting purposes (see existing bushfire assessment). These can also be sized to capture and retain rainwater for other non-potable purposes (eg toilets, garden taps, washing machines) (DCP 165 S2.1). The building envelopes are large enough to accommodate capacious gravity-fed tanks. The tank overflows will be fed into individual dispersal systems.
 - b) Stormwater discharge can be gravity-fed into the downhill area and APZs for Lots 122-125 inclusive. Lots 121 and 126 have existing stormwater arrangements for each house, with additional areas downhill of each house available for retention (DCP 165 S2.1), or dispersal if required. Lot 127 has a smaller area between its building envelope and its downhill boundaries. More than 220 sq m is available along the southern boundary (allowing for stormwater to fall from the highest point of the envelope to a disposal area downstream of the envelope), with about 30 sq m along the western boundary. Both areas lie outside the building envelope. If needed, the detention area could be located within the envelope, with any residence simply located further uphill within the envelope. The envelopes are very generous (exceeding 650 sq m each), so engineered detention or dispersal areas can be located within or outside them, within each lot.
 - c) As individual lots move towards registration, individual internal stormwater management plans can be prepared with direct reference to DCP 165. The current proposal is more conceptual, but the DCP has been referenced in order to ensure that it can be fully implemented as the proposal proceeds towards any subdivision.
 - d) Although the driveway servicing all new lots will be slightly widened and lengthened, the bulk of the impervious area is already in place. The drainage line is piped beneath the driveway, which does not flood, according to the residents, as it is very high in the catchment.
 - e) A consequence of DCP 165 and the bushfire report may be the imposition of a Restriction-As-To-User for the APZs, for both bushfire and stormwater management purposes (eg DCP 165, S4.2(e)).
- An additional letter from our bushfire consultant has been forwarded separately, addressing RFS' concerns.
- The owners have provided evidence of their right to connect to the sewer, which was negotiated during the compulsory acquisition of part of Lot 391. The

General Arrangement Plan shows how the existing sewer line can be extended into a gravity-fed system for the whole subdivision.

- As shown on the General Arrangement Plan, a single shared access from Marana Road to all new lots and to the existing house on Lot 3912 is proposed. The existing house on Lot 416 will retain its existing (separate) access from Marana Road. There is currently no proposal to seek connection to the proposed highway, although the owners retain their right to access as negotiated during the compulsory acquisition of part of Lot 391. At this point, their objective is to receive access to the highway (whether direct, via Marana Road, or by negotiation once the highway design is underway, with public consultation).
- The General Arrangement Plan (as amended) shows the turning arrangements for garbage trucks, which require more space than RFS and emergency vehicles.
- It is proposed that Lot 123 will own the driveway, with all other lots benefitting from a right of access and easement for services. The sewer easement will follow the path of the proposed sewer line (as shown on the General Arrangement Plan) (with S88B instruments on each Title).

If the information now being submitted, when added to the previous material, is considered sufficient for submission to DOPI for the gateway determination, please advise when that is likely to occur. Otherwise, please advise the next steps.

Yours faithfully

Helen Monks

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ATTACHMENT

FLOOD EXTENT, SPRINGFIELD



Source: Gosford City Council, GEMS, accessed 12 July 2013

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