



Office of Environment & Heritage

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Ms Monica Gibson
Director Regions
Hunter and Central Coast
Department of Planning and Environment
PO Box 1226
NEWCASTLE NSW 2300

Attention: Ben Holmes

Dear Ms Gibson

Monica

**Planning Proposal PP_2016_MAITL_002_00
Housekeeping amendment to the Maitland LEP 2011**

I refer to your request for comment on Maitland City Council's response to the Office of Environment & Heritage's concerns with the draft LEP amendments as they relate to residential development in Central Maitland. I apologise for the delay in responding formally.

The LEP amendment provides for the implementation of the Central Maitland Structure Plan (CMSP). OEHL considers that the plan is inadequate in how it deals with flood risk. The CMSP, whilst acknowledging that almost the entire area of Central Maitland and Horseshoe Bend is inundated in a 1% Annual Exceedance Probability (AEP) event, concerns itself primarily with strategies to minimise the cost of damage to property in such an event. It does not effectively address the management of risk to life and the risk associated with floods greater than the 1% AEP. It recognises the need for "strategies that allow for safe evacuation" but fails to acknowledge that no viable strategies have been identified.

The challenge for Central Maitland is that it is surrounded by high hazard floodways in floods equivalent to 5% AEP or greater and that existing evacuation routes are cut several hours before the flood peak occurs. This creates the potential for a very large number of people to be trapped in areas that might later become flooded. Even if those people were able to find refuge in upper levels of buildings, they would face the prospect of isolation without services such as electricity, water, sewerage and telecommunications for many days. OEHL and the NSW State Emergency Service consider that the evacuation, resupply and protection (from secondary emergencies) of such a population could place an unreasonable burden on emergency services and create an unnecessary risk for their personnel.

Maitland City Council adopted its Flood Risk Management Plan in November 2015. The plan recognises that any proposal to increase the population in Central Maitland would have to be accompanied by an alternative strategy to manage risk to life and that this would be best achieved by

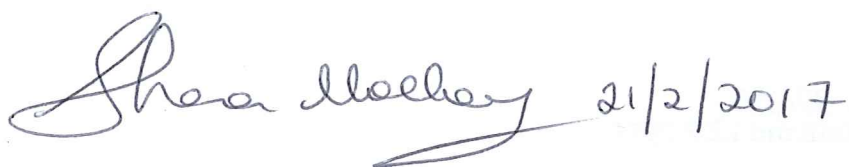
a high level evacuation route. Indicative costs ranged between \$25 million and \$80 million with the preferred strategy being the replacement of the Long Bridge across the Oakhampton floodway.

OEH participated in preliminary discussions with council and Roads and Maritime Services in 2015 in relation to possible replacement of the Long Bridge. It was established that the bridge was constructed in 1970, had no significant defects and had a design life of about 100 years. RMS indicated that replacement of the bridge in the short term would be a low priority and unlikely to attract funding. Council subsequently applied for a Floodplain Management Program grant to conduct a preliminary feasibility study for one of the high level evacuation routes. It was not successful. OEH is not aware of any further investigations of evacuation routes.

OEH's position remains that, as a matter of principle, no increase in the residential population of Central Maitland should be supported until such time as a high level evacuation route is planned and funded. In the absence of such a route, OEH would support strategies that reinforce the civic, economic and administrative functions of Central Maitland without increasing its at-risk residential population.

If you would like to discuss this advice, please contact Peter Evans, Senior Team Leader, Water, Floodplains and Coast on 4927 3107 or at peter.evans2@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, reading "Sharon Molloy", followed by the date "21/2/2017".

SHARON MOLLOY
A/Regional Director
Hunter-Central Coast

Contact officer: PETER EVANS
4927 3107