

## **Attachment G – Request for additional information (Flooding), BCD**

Mr Paul Hickey  
Ballina Shire Council  
PO Box 450  
Ballina NSW 2478

Attention: Ms Jessica Hutley

Dear Mr Hickey

**RE: Seniors Housing Development, 550-578 River Street WEST BALLINA (2022/721/1)**

Thank you for your referral dated 16 March 2023 about the proposed seniors housing development at West Ballina seeking comments from the Biodiversity and Conservation Division (BCD) of the Biodiversity, Conservation and Science Directorate in the Environment and Heritage Group of the Department of Planning and Environment. I appreciate the opportunity to provide input and apologise for our delayed response relating to flooding matters.

We have reviewed the following documents in relation to flooding:

- *Seniors Housing – GemLife Land Lease Community – Statement of Environmental Effects (SEE)* prepared by RPS and dated 16 January 2023.
- *GemLife Ballina – Interim Flood Report* prepared by BMT and dated 9 December 2022.

We understand that flood modelling and assessment for the proposal has not yet been completed, and the flood assessment in the SEE and Interim Flood Report are based on assessment undertaken for a previous development application on the site. Nevertheless, given the proposed development footprint is smaller than the previous development application, the flood modelling is expected to result in less of an impact and therefore be acceptable.

In the *Ballina Flood Study Update 2008* (prepared by BMT), the flood level estimates for the proposed development area are:

- 20yr Average Recurrence Interval (ARI) - 1.6m AHD;
- 50yr ARI - 1.8m AHD;
- 100yr ARI - 2.0-2.1m AHD;
- 500yr ARI - 3.0-3.5m AHD;
- Probable Maximum Flood (PMF) - 3.7m AHD.

In the Ballina Shire Development Control Plan 2012 - Chapter 2B: Floodplain Management, the flood level estimates for the proposed development area are:

- 100yr ARI 2050 - 2.3m AHD;

- 100yr ARI 2100 - 2.7m AHD.

An emergency access point to the north of the site via River Street is proposed to be used for evacuation during extreme flood events. We understand that a more detailed analysis will be provided in a final Flood Report and Flood Emergency Management Plan (FEMP) when data is provided from the Council to undertake modelling. The FEMP will need to identify safe areas to gather and be evacuated in the case of extreme flooding events.

A full analysis and review of flood issues cannot be undertaken until the updated modelling, Flood Report and FEMP are provided. The issues that need to be addressed include, but may not be limited to:

- Modelling of the full range of flood events including events larger than the 100-year ARI;
- Estimation of possible isolation time and need for evacuation;
- Protocols and availability of shelter in place;
- Evacuation routes;
- Timelines for evacuation;
- Flood predictions and triggers for the site;
- Consideration of the impacts of climate change;
- Consistency with Local Flood Plans;
- SES feedback and assessment of resources and consistency with SES plans and protocols.

If you have any questions about this advice, please do not hesitate to contact Mr Gene Mason, Senior Conservation Planning Officer, at [gene.mason@environment.nsw.gov.au](mailto:gene.mason@environment.nsw.gov.au) or 8289 6315.

Yours sincerely



13/04/2023

**DON OWNER**  
**A/-Senior Team Leader Planning, North East Branch**  
**Biodiversity and Conservation**