



Your ref: PP-2022-3959
Our ref: DOC23/406697-6

Sarah Connell
Senior Strategic Planner
Port Stephens Council

By email: sarah.connell@portstephens.nsw.gov.au

Dear Sarah,

Request for advice – Sunrise Lifestyle Village Scoping Proposal – Port Stephens LGA

I refer to your Planning Portal referral, dated 15 May 2023, seeking input into the Sunrise Lifestyle Village scoping proposal. This proposal directly relates to 13.7 hectares (ha) of land, currently zoned RU2 Rural Landscape at 4011, 4029 & 4045 Nelson Bay Road, Bobs Farm (Lot 51 DP 1175028, Lot 3622 DP 622485, Lot 2 DP 622229) (subject site). The scoping proposal seeks to include the subject site within Schedule 1 of the Port Stephens Local Environmental Plan 2013 as an Additional Permitted Use to permit a caravan park. A portion (0.4 ha) of the subject site is also proposed to be rezoned as C2 Environmental Conservation.

Biodiversity and Conservation Division's (BCD) recommendations are provided in **Attachment A** and detailed comments are provided in **Attachment B**. If you have any further questions about this issue, please contact Jayme Lennon, Senior Conservation Planning Officer, on 9585 6935 or at huntercentralcoast@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Crick'.

Steven Crick
Senior Team Leader Planning
Hunter Central Coast Branch
Biodiversity and Conservation Division

13 June 2023

Enclosure: Attachments A and B

BCD's recommendations

Sunrise Lifestyle Village Scoping Proposal

1. The BDAR should be updated to refer to and utilise the revised Eastern NSW PCTs. Adjustments to the BDAR should be made where necessary if new threatened species are considered under the current PCT that aligns with the onsite vegetation community.
2. BCD advises that the Stormwater Strategy does not satisfy the Gateway Determination requirement to demonstrate that the shelter-in-place arrangements do not pose a significant risk to life.

BCD's detailed comments

Sunrise Lifestyle Village Scoping Proposal

Biodiversity

1. Plant Community Type (PCT) 1646 Smooth-barked Apple - Blackbutt - Old Man Banksia woodland on coastal sands of the Central and Lower North Coast has been revised

The revised Eastern NSW PCTs were deployed on the 14 April 2023. Biodiversity Development Assessment Reports (BDARs) and Biodiversity Assessment Method Calculator (BAM C) files should now refer to and utilise these revised PCTs.

Recommendation 1

The BDAR should be updated to refer to and utilise the revised Eastern NSW PCTs. Adjustments to the BDAR should be made where necessary if new threatened species are considered under the current PCT that aligns with the onsite vegetation community.

Flooding and flood risk

2. Insufficient information has been provided to assess the appropriateness of the proposed flood emergency response strategy.

The proponent has not satisfactorily demonstrated that there are appropriate arrangements for shelter-in-place and evacuation in a probable maximum flood event (PMF), in consideration of the draft shelter-in-place guideline, in accordance with its Gateway Determination conditions of consent. The Stormwater Strategy, prepared by ADW Johnson, found that the site would be isolated for 14 hours, which exceeds the draft guideline's maximum of six hours. The report claims that the long duration of isolation does not pose a significant risk to life as:

- The entire Sunrise community, including internal roads and community facilities, is situated above the PMF level.
- Residents sheltering in their homes are likely to have sufficient stores of food and living essentials in the order of several days.
- Connectivity between residents is retained at all times, including residents within the existing Sunrise Stage 1 community.
- Access to an existing service station at 4136 Nelson Bay Road is uninterrupted, providing continuous access to fuel, food and basic amenities.
- Travel between the site and Anna Bay would be gained by specialist vehicles or four-wheel-drives in less than 14 hours should it be warranted by a medical emergency.
- A community bus is retained on-site which could assist with evacuation of non-driving residents once access to Anna Bay is restored.

BCD does not consider that the report has appropriately considered the risks of sheltering in place. The period of isolation for future residents is over double the acceptable limit during a PMF event. Further, Figure 11 suggests that the period of isolation exceeds the acceptable limit for flood events with AEP's as small as 5% AEP. Consequently, a detailed assessment of the risks is required. At a minimum, this assessment should consider:

- How will the frequency and duration of isolation of the site be impacted by climate change?
- What warning services does the Bureau of Meteorology (BoM) provide for this location for all types of flooding (i.e. local catchment and Hunter River)?
- Is there a warning service available from external providers, such as Emergency Warning Network (EWN)?
- How much warning time is available for both Hunter River flooding and local catchment flooding?
- Who is responsible for monitoring flood warnings and how often should they monitor warnings?
- What messaging will be provided to residents?
- Is this plan consistent with the NSW State Emergency Service (SES) Flood Emergency Sub-plan for the area?
- How much time is required for residents to prepare for isolation?
- How will messages be communicated?
- Who will be responsible for issuing the messages?
- What is the vulnerability of the community and what is the probability that a medical emergency will occur during isolation?
- What happens if a fire occurs during isolation?
- What happens if residents fail to prepare for isolation? BCD considers that it is highly unlikely that the petrol station at 4136 Nelson Bay Road will be open during a large flood event.
- Is there a need for emergency provisions to be kept on site?
- What is the hazard classification on Gan Gan Road at McKinley Swamp?
- What is the probability of a medical emergency occurring during the time that the site is isolated?
- What is the probability that sewer, water and power supply will be interrupted during a major flooding event?
- What is the impact on the residents if these essential services fail?
- What is the frequency and duration of isolation for floods smaller than the PMF?
- What happens if flood warnings are issued at night when residents are sleeping?
- Is there sufficient warning time available for residents to prepare?
- Where are the nearest continuously monitored rain gauges to the site?
- What ongoing education for the residents is required to ensure they know how to prepare for and respond in an emergency?

Recommendation 2

BCD advises that the Stormwater Strategy does not satisfy the Gateway Determination requirement to demonstrate that the shelter-in-place arrangements do not pose a significant risk to life.