

# Hawkesbury City Council

Your Ref: 11/03622  
Our Ref:

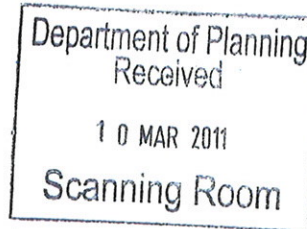
7 March 2011



NSW Department of Planning  
Locked Bag 5020  
PARRAMATT NSW 2124

Attention: Gilead Chen

Dear Gilead Chen



366 George Street  
(PO Box 146)  
Windsor NSW 2756  
Phone: 02 4580 4444  
Facsimile: 02 4587 7740  
DX: 8601 Windsor

**SEPP (Housing for Seniors and People with a Disability) 2004**  
**Application for a Site Compatibility Certificate - 28 & 30 Ivy Avenue, McGraths Hill**  
**(Lot 25 & 26, DP 1025505)**

I refer to the Department's letter of 23 February 2011 requesting comments from Hawkesbury City Council in relation to the application for a Site Compatibility Certificate for the abovementioned property. A review of the application has been undertaken and the following comments are provided.

The application has adequately described the concept development proposal and has addressed many of the requirements for the Site Compatibility Certificate. However, Council has concerns with the strategic justification of the proposal, particularly in relation to the "Consistency with Local and Regional Strategies" and in relation to flood evacuation of the property.

## **Consistency with Local and Regional Strategies**

The application has stated that the proposed development is consistent with the Sydney Metropolitan Strategy and the Hawkesbury Community Strategic Plan. However, the application has not made adequate mention of the draft Northwest Subregional Strategy and has made no mention of the draft Hawkesbury Residential Land Strategy and the direction that this document is proposing in relation to development in the McGraths Hill locality.

It is not considered appropriate that an individual development be assessed for consistency against high level strategies such as the Sydney Metropolitan Strategy or the Hawkesbury Community Strategic Plan. These Strategies are not intended to be used to assess individual proposals but are aimed at overall strategic directions for Cities or Local Government Areas. In this regard, the statement made in the application that the proposal is consistent with these documents is of little value and should not be considered as justification for such an application.

When the application is assessed against the draft Northwest Subregional Strategy and the draft Hawkesbury Residential Land Strategy it is clear that the proposal is inconsistent with the general direction of both of these documents.

## **Flood Evacuation**

The draft Northwest Subregional Strategy contains the following statement:

Dept Planning Site Compatibility McGraths Hill.doc/m

*Where people make the difference.*

All communications to be addressed to the General Manager  
P.O. Box 146, Windsor NSW 2756  
Website: [www.hawkesbury.nsw.gov.au](http://www.hawkesbury.nsw.gov.au)  
E-mail: [council@hawkesbury.nsw.gov.au](mailto:council@hawkesbury.nsw.gov.au)  
Hours: Monday to Friday 8.30am - 5.00pm



*"For most parts of the Hawkesbury local government area to the south of the Hawkesbury River there is no capacity for additional growth outside that already planned under Hawkesbury Council's Local Environmental Plan, without substantial further upgrades to the flood evacuation network." (p82)*

This statement is made in the context of future development in the Hawkesbury and is of particular relevance to the compatibility of the subject land for development of Seniors Housing. There is a clear understanding in this Strategy that flood evacuation is a major issue that must be addressed in the Hawkesbury prior to development of additional residential development, including Seniors Housing.

The current draft Hawkesbury Residential Land Strategy has recently completed public exhibition (October 2010 to end January 2011) and is to be reported to Council for adoption in April. The purpose of this strategy is to identify land suitable for further investigation for residential development. The identified land was selected based on criteria contained in the relevant State strategies and some local criteria adopted by Council in July 2008. One of the criteria relates to flood prone land and the Strategy contains, amongst other statements relating to flood prone land, the following statement in regard to land that has been excluded from further investigation:

*"Non-urban flood prone land – All non-urban zoned land currently affected by the 1:100 year flood event is not considered suitable for intensification of residential development."*

For the reasons set out in the draft Residential Land Strategy and the statement above, the locality of McGraths Hill has not been identified for future investigation for residential development due primarily to the flood affectation and evacuation problems of the locality.

The current application has not made any provision for flood evacuation of the site. The evacuation route in times of flood would be via Pitt Town Road and Windsor Road (as the route via Pitt Town and Windsor is very low (5m AHD) and is frequently cut in a flood of less than 5 year occurrence interval.) However, this primary flood evacuation route from the site is cut in Ivy Street itself, close to the intersection of Pitt Town Road. The road level in this vicinity is approximately 14.5m AHD and will be inundated in a 1 in 10 or 12 year flood event. Given that the proposed development is for Seniors Housing it is not appropriate that such housing should be located in an area that is isolated relatively frequently by flood water.

In this regard it is considered that the proposed development is inconsistent with the draft Northwest Subregional Strategy and the draft Hawkesbury Residential Land Strategy. Due to this inconsistency and the relatively frequent isolation of the land in times of flood it is considered that a site compatibility certificate for development of the site for Housing for Seniors and People with a Disability should not be issued.

Should you have any further queries regarding this matter please contact the undersigned.

Yours faithfully



Matthew Owens  
Director City Planning

Direct Line: (02) 4560 4540