

General Manager  
Parramatta City Council  
30 Darcy Road,  
PARRAMATTA NSW 2150

August 27, 2015

PROJECT: **21A TUCKS ROAD, TOONGABBIE**  
RE: **PLANNING PROPOSAL**

This letter is prepared in support of the Planning Proposal for 21A Tucks Road, Toongabbie. The letter has been prepared to respond to the relevant key issues contained within the Section 117 Direction in relating to flooding. The relevant provisions are outlined below with a response provided against each point. The Planning Proposal contains an address of all 117 Directions while this letter is confined to the key flooding issues that must be considered.

***(4) A planning proposal must include provisions that give effect to and are consistent with the NSW Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005 (including the Guideline on Development Controls on Low Flood Risk Areas).***

- Although Parramatta City Council's Flood Map indicates the site as being partially flood affected in the 1% AEP Event, The local flood regime is actually a function of local catchment runoff exceeding the capacity of the formal stormwater pipe system. The major system flowpath is the road reserve adjoining both the eastern and western boundaries of the site.
- The existing LEP contains flood related planning development controls that would apply to any development proposal on the subject site. These provisions are retained and the underlying zone of the land remains unchanged.
- The redevelopment of the allotment is able to occur in a manner consistent with the provisions of the Floodplain Development Manual 2005 and Councils own flooding controls that would apply to the development. It is expected that detailed assessment of flooding and analysis of consistent with Councils flood related development controls would occur at DA stage.

***(6) A planning proposal must not contain provisions that apply to the flood planning areas which:***

***(a) permit development in floodway areas,***

- A very small area adjacent to the western boundary of the site is within the designated 1:100 year ARI (1%AEP) flowpath. The depth is shallow due to the topography of the site being very flat (tennis courts)

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- The site is classified as flood prone land as it is *"land susceptible to flooding by the PMF"* as described in the Floodplain Development Manual 2005
- The appropriate Flood Planning Level (FPL) for this site will be the 1% AEP (1 in 100 year) Flood Event plus 0.5m freeboard.
- Flood management strategies will be implemented for the PMF event and will be detailed in a Flood Risk Assessment Report with any Development Application.

It is important to note that the NSW Floodplain Management Manual 2005 states the following:

***"it is neither feasible nor socially or economically justifiable to adopt the PMF as the basis for FPL's. FPL's for typical residential development would generally be based around the 1% AEP flood event plus an appropriate freeboard (typically 0.5m)"***

For the purpose of this project, the following overland flowpath levels are applicable

- R.L. 25.65m AHD as the 100 year flood level
- R.L. 30.02m AHD as the PMF level.

#### GROUND FLOOR LEVELS

The boundary levels around the perimeter of the site are currently at an average of R.L. 25.60m AHD (i.e marginally below the 1 in 100 year flow path level)

#### BASMENT ACCESS RAMPS.

Any access ramp from the Tucks Road or Rausch Road frontages will need to ramp up to a crest before sloping down to the basement car park (to achieve 500mm freeboard)

#### RESIDENTIAL LEVELS

Given that the ground floor will be commercial/retail and floor to floor heights in this zone would typically exceed 4m, the first floor level will be at least R.L. 30.10m AHD

This means all residential levels will be above the PMF level.

*(b) permit development that will result in significant flood impacts to other properties,*

- A very small area along the western boundary of the site is inundated by the 100 year flood event. The depth of flow along the western site boundary at this location is relatively shallow and therefore any impacts on existing flood storage will be negligible and there will be no significant impacts to other properties.

*(c) permit a significant increase in the development of that land,*

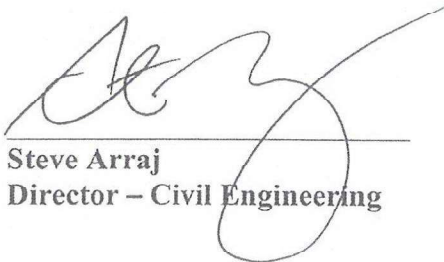
- The Planning Proposal will result in additional occupants on the site. As the site is in a highly urbanized catchment, the flood durations are relatively short and occupants are likely to shelter in place rather than evacuate the site. Accordingly, the need for increased services is considered minimal.
- For storm events up to the 100 year event, it is possible to evacuate the site to the Rausch Street frontage and travel in a southerly direction along Rausch Street. The footpath along the western side of Rausch Street is at or above the 100 year flood level and considered safe to travel along. Vehicle are also able to evacuate the basement car park as flood depths at the driveway entry are below the maximum allowable depth of 200mm for vehicle egress.
- For storm events greater than the 100 year flood event and up to and including the PMF, occupants will shelter in place. A mechanically operated roller shutter and warning systems in the basement car park will be linked to the alarm system and vehicular egress will be prohibited.
- As occupants shelter on site (a communal area will be provided above the PMF level) the number of occupants and increase in development of land will not impact on the evacuation strategies applied to the site.
- The proposal incorporates a twenty-four hour gymnasium which will have a manager permanently stationed for the commercial facilities. The Facility Manager will be assigned the task of conducting any evacuations in the event of fire or flood or any other emergency. This procedure will be outlined in the Evacuation and Management Plan incorporated with the strata by-laws and lodged with the Development Application.
- A Flood Risk Assessment and Flood Warning, Evacuation and Management Plan will be lodged with the Development Application and detail the measures that will be incorporated for this site.

(d) *are likely to result in a substantially increased requirement for government spending on flood mitigation measures, infrastructure or services, or*

- Development on the site will not, in all likelihood, result in a need for substantially increased requirements for government spending on flood mitigation measures, infrastructure, or services as the floodwater and flooding impacts can be addressed through design measures rather than broader measures that would require changes to the catchment. The proposal does not create a need for any spending for flood mitigation measures or infrastructure as the design at ground level does not create any detrimental effects on the flood regime at the site and throughout the associated catchment. This will be comprehensively detailed in the flood risk assessment which will be submitted at the DA stage.

I trust explains our position regarding this application, if you have any queries, please do not hesitate to contact me on (02) 9687-9222

Sincerely Yours,



Steve Arraj  
Director – Civil Engineering

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