



Office of
Environment
& Heritage

DOC18/94288
MP09_0180 MOD 7

Emma Butcher
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Butcher

OEH comments on Notification of Modification Seniors Living Housing Development, 34-36 Memorial Avenue, Kellyville (MP09_0180 MOD 7) – floodplain risk management comments

Thank you for providing the Office of Environment and Heritage (OEH) with an extension to provide comments on the Environmental Assessment (EA) for the above Modification (MP09_0180 MOD 7) project.

In addition to the OEH submission of 26 February 2018 on the EA which relates to biodiversity issues, OEH provides the following floodplain risk management comments on the MOD 7 proposal.

The stormwater Management Report (Wood & Grieve Engineers, December 2017) Section 3.1 indicates that major runoff for events equal to or exceeding the 1% AEP would flow overland. Section 4 states 'To ensure the localized flooding is kept to a minimal, the proposed development site has been designed to ensure all runoff is directed to the existing road infrastructure. Another critical design aspect which has been incorporated into the stormwater drainage plans are overland flow paths. Overland flow paths have been included where required to ensure that the existing flow paths are maintained and unobstructed.' However, the report does not provide any details as to the overland flow path characteristics i.e. volume, depth, extent, velocity and duration for the full range of events (i.e. up to the PMF).

OEH notes that the proponent in Section 4 states '...the site is not subject to flooding and is not restricted by existing drainage capacity'. However, this information should be based on over-land flow (OLF) assessment. Under the NSW Government's Flood Prone Land Policy, the principles of the Floodplain Development Manual (2005) applies to lands affected by overland flow. Therefore, details on OLF should be included in the report for the proposed site and adjacent areas for the full range of events up to the PMF.

OEH understands that Council has developed The Hills Urban Overland Flow Study and recommends that this study is utilised to provide details on OLF within the whole site for the developed scenario.

Moreover, Section 2.4 of The Hills Development Control Plan 2012 addresses development controls that are applied to 'Sensitive Uses and Facilities'. DP&E should ensure that the development satisfies

the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005 through the application of these controls.

If you have any queries regarding this matter, please contact Janne Grose on **t**:8837 6017 or **e**: janne.grose@environment.nsw.gov.au

Yours sincerely

S. Harrison 06/03/18

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