

Good morning Emma,

The following comments are made in relation to MOD14 at Huntlee.

In summary the following comments are made with further details provided below:

- The proposed development is at risk of significant inundation in the event of a flood. Should the flood risk behaviour considered to be acceptable, Council would request that the proponent install and maintain a flood warning system.
- Centralised sewer is available, as such it is considered appropriate that the site should be connected in. On-site sewage management is not considered to be a viable option and is discouraged. Should on-site disposal be considered appropriate, the following restrictions should be imposed on the Deposited Plan and 88B dwelling size restrictions, building envelope, level of treatment and disposal methods mandated in accordance with the most up-to-date report and a restriction on ancillary development to be contained within the building envelope.
- Building envelopes should be appropriately sited to avoid any significant vegetation.

Flooding

- Concerns in raised in relation to flood risk of flood events rarer than the 1% AEP (100yr ARI) flood.
- The Black Creek Stage 2 flood model shows flood depths in this subdivision of up to 7m with the majority of the site experiencing H6 flood hazard. What this means is that an event similar to a PMF could result in loss of life and serious structural damage of buildings and infrastructure.
- The response received is shown below and is extracted from page 27 Stormwater Management Strategy for Wine Country Drive Large Lot Residential Subdivision, Northrop April 2021:

During the regional PMF event, the subject site is expected to be affected by up to approximately 7 meters of flood water over the developable portions of the site. It is anticipated that given the magnitude of the event, enough notice will be available for future residents to evacuate prior to the peak of the event. This is expected to be addressed in a regional flood emergency plan.

- This response assumes that flood risk can be adequately managed in a regional flood emergency plan. It is likely that the only reliable method to manage this risk will be the installation of a flood warning system. This system should be paid for by the proponent, as there is no existing residential zoned nearby that would benefit from a flood warning system.
- In addition it is requested that LWP prepared flood mapping for the 0.5% AEP (200yr) and 0.2% AEP (500yr) which show flood risk and demonstrate flood free evacuation routes for all residents.

Sewage Management

- The report was completed on the basis of sewer connection **not** being available, it is our understanding that sewer is available for connection.
- The feasibility of providing sewer has previously been established as evidenced by the current approval and given the scale and nature of the development approved is appropriate.
- No justification has been provided for departing from centralised sewage system on which the current approval is subject to including comparison on the basis of ecological sustainability and public health outcomes.

- Whilst a subdivision level wastewater report is provided, it does not consider the established feasibility of centralised sewer option and provides recommendations on the basis of conditions and assumptions considering the overall development and their implementation.
- In our experience, the basis of such conclusions and implementation of fundamental elements of the report is rarely realized following subdivision and the splintering of ownership across individual property owners.
- Further, in cases of small allotments which are commonly sought feasibility does not extend beyond a maximum sized house to include ancillary development commonly associated with established properties such as garages, carports, landscaping, driveways, parking, entertainment or recreation areas, and swimming pools.
- This results in a large number of properties being established that are unable to meet the basic expectation of current day demands on residential properties. Longer term the value of the properties is compromised or otherwise illegal development encroaches on systems disposal areas irreparably undermining the systems operation and prospect or re-establishing a sustainable solution.
- In NSW The Health Protection Guidelines for Single Households quotes EPA modelling suggesting that minimum lot sizes of 4000-5000m² total area is necessary to reduce impacts in the medium to long term of on-site sewage management. Even at these levels constraints and risk are not eliminated but are able to be better managed and balanced against the expectation of the property's capability.
- Supporting such a development proceeding reliant on onsite wastewater where centralised sewage is feasible would result in the significant and likely irreversible missed opportunity to secure long term sustainable solution in perpetuity and design out the inherent constraints and risk associated with onsite wastewater management.
- Where centralised sewer is not available and onsite sewage is determined to be the best long term option close scrutiny is required to ensure that the desired outcomes as modelled are achieved by ensuring
 - Suitable lot sizes;
 - The basis of which suitability has been identified including conditions, constraints and assumptions relied on is protected and enshrined through the imposition of restrictions on the land i.e. dwelling size restrictions, building envelopes, level of treatment and disposal methods mandated and restrictions on ancillary development.

Planning

- Identification of a building envelope on the DP and 88b for each allotment. The building envelope for each allotment should be sited within the existing cleared area of each allotment, where possible.

Should additional information be submitted throughout the assessment of the modification, Council reserves the right to provide further input. While every effort has been made to provide full and comprehensive advice, a detailed assessment of all associated impacts is considered necessary.