

RECORD OF PRE-DEVELOPMENT ADVICE



9 January 2024

Lucinda Craig

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Dear Ms Craig,

Mingara Recreation Club Seniors Housing, Tumby Umbi (SSD-63475709) – Council Submission

I refer to your email of 20 December 2024 where a time extension was granted until 10 January 2025 for Council to provide the following comments on the exhibited development.

PLANNING

[Water Management Act 2000](#)

It is unclear whether the proposed development is located within 40 metres of a watercourse which would require a controlled activity approval under the *Water Management Act 2000*. The proposed development is to be clearly indicated in relation to the watercourse to determine whether the development is 'Nominated Integrated Development'.

[State Environmental Planning Policy \(Transport and Infrastructure\) 2021](#)

Clause 2.119 relates to development with frontage to a classified road (Wyang Road) and seeks to ensure that new development does not compromise the effective and ongoing operation and function of classified roads, and to prevent or reduce the potential impact of traffic noise and vehicle emission on development adjacent to classified roads.

[Central Coast Local Environmental Plan 2022](#)

- Clause 5.21 – Flood Planning:

The 1%AEP flood event partially impacts the development site. Depths range from 10-100mm at the southwestern boundary of the development site to 5mm at the eastern boundary of the development site. Flow velocities through the site typically do not exceed 0.1m/s and the flood hazard is classified as HI in the 1%AEP event, which is safe for the elderly.

The development application must address this flooding risk to ensure Council is satisfied that the development–

a) *is compatible with the flood function and behaviour on the land, and*

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- b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and*
 - c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and*
 - d) incorporates appropriate measures to manage risk to life in the event of a flood, and*
 - e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.*
- Clause 5.22 – Special Flood Considerations:

This clause applies to sensitive and hazardous development land between the flood planning area and the probable maximum flood, noting sensitive and hazardous development means development comprising boarding houses, caravan parks, correctional centres, early education and care facilities, eco-tourist facilities, educational establishments, emergency services facilities, group homes, hazardous industries, hazardous storage establishments, hospitals, hostels, information and education facilities, respite day care centres, seniors housing, sewerage systems, tourist and visitor accommodation, water supply systems.

The site is identified as impacted with various Flood Precincts. Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the whether the development—

- (a) will affect the safe occupation and efficient evacuation of people in the event of a flood, and
- (b) incorporates appropriate measures to manage risk to life in the event of a flood, and
- (c) will adversely affect the environment in the event of a flood.

The Mingara Site is classed as a High Flood Island by the Tuggerah Lakes Floodplain Risk Management Study and Plan 2018. The entire site would be cut off during a PMF event. It is reasonable to assume that a significant proportion of occupants may require frequent medical attention and regular access to hospital. Ambulance access to the Mingara precinct will be cut off during the 20% AEP, 5% AEP and 1%AEP events.

Due to its lack of safe evacuation the seniors living development at this location would not be consistent with the recommendations of the Floodplain Risk Management Toolkit 2023. The development would fail to satisfy CCLEP cl. 5.22 Special Flood Considerations due to its lack of safe evacuation for vulnerable occupants. Refer to Floodplain Development comments below for further information.

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[Central Coast Development Control Plan 2022](#)

- Part 2: Development Provisions

[2.13 Transport and Parking](#)

The proposal includes a significant amount of stacked parking. The stacked parking in front of the villa garages is impractical as it blocks access to the garages. Some of the stacked parking shows 3 car spaces in front of 2 garages. Even if the parking is only used by the residents of the villas with garages, 2 cars would need to move for 1 car to access the garage (refer to Figure 1).

Some of the car parking spaces have trees located in the centre, garden beds partially located in car parking spaces, some car spaces have no driveway access or will conflict with other parked cars when manoeuvring into the parking space (Figures 2-4).

The seniors living development is proposed to be located within the grassed parking area for the athletics track. The Traffic Report states that there is sufficient existing parking on the site, however, there is only the 2 spaces that are located near the track. The loss of parking should be accommodated within a convenient location near the track which provides safe access for families (close to and not crossing main access roads to Mingara). It is noted that the athletics track currently has approval for 1000 people. The aerial photograph in Figure 5 shows the extent of the grass area currently used for parking during events at the athletics track. Figure 6 shows the proposed walking routes from the proposed parking areas for the track if the seniors living development is constructed. These parking areas are not considered to be safely and conveniently located for athletics track parking. Refer to Traffic and Transport comments for further information.

- Part 3: Environmental Controls

[3.5 Tree and Vegetation Management](#)

It is noted that a BDAR and Vegetation Management Plan (VMP) has been submitted with the SSD application and are on exhibition.

There is not sufficient time for Council to undertake a detailed technical review of the BDAR. It would be expected that DEECCW would provide any BDAR review comments to DPHI. However, any approval should include conditions that the mitigation measures in the BDAR and the requirements of the VMP are implemented by the proponent.

The current VMP states implementation is voluntary, and that the performance measures are not a "conditional compliance requirement" (section 5). Implementation of the VMP is a biodiversity mitigation and management measure for the direct and indirect impacts of the development, and as such implementation should form part of any conditions of approval. Council would also request that copies of VMP certification reports should also be forwarded to the consent authority and Council's Ecologist when they fall due, the current VMP only requires reporting to MLG. Refer to Ecology comments for further information.

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Other Matters

Street Design Guideline

Council's Street Design Guidelines are required to be implemented within the overall design of the proposed development. Details of the guidelines can be accessed [here](#).

ECOLOGY

As identified in the riparian restoration area plan provided, a Vegetation Management Plan (VMP) should be prepared for the drainage corridor. Council's [Flora and Fauna Guidelines 2019](#), provide some information on VMP requirements. The VMP should also integrate with NSW DPE Water requirements. Being an SSD, the department will review the VMP with comment usually provided by Council. Items the VMP should address include:

- The VMP area needs to be clearly defined and should encompass most of the drainage corridor adjacent the precinct.
- Identify vegetation management zones, APZs, weed density/other management issues which need to be addressed.
- Management actions detailed using the 'SMART' goals approach (Specific, Measurable, Achievable, Reasonable and Time bound).
- Management actions should be staged across a minimum three phases including pre-development, development and post development (ongoing, for a minimum five years).
- Identify weed species in the VMP area and provide appropriate control techniques.
- Provide a plant schedule and identify nurseries that could be engaged to supply local provenance plants.
- Provide best practise methodology on planting technique and required maintenance of plantings.
- Consider providing interpretive educational signage at strategic areas along the footpath on wetland ecology and biodiversity.
- Note, copies of VMP certification reports should be forwarded to the consent authority and Council's Ecologist when they fall due.

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URBAN DESIGN

Masterplan

Council previously advised in the pre-lodgement meeting with the applicant that a masterplan for the site should be prepared given the size, scale and density proposed in the seniors living development especially given there is no public road access. No masterplan has been prepared.

Residential Amenity

- The proposed communal spaces are confined to the Building 2. The lobby and café/servery area in Building 2 is only sufficient for the Aged Care beds section of the development. Given the number of dwellings, the communal facilities are considered to be insufficient for the scale of the development and does not provide reasonable access to the facilities for all residents.
- The EIS states that while the proposed seniors living is located in close proximity to the Mingara Recreation Club, the seniors living is not a part of Mingara Recreation Club and will be under separate ownership and operate independently. Given this, the proposed development cannot rely upon Mingara Recreation Club for the provision of communal resident facilities.
- Communal open space needs to be provided for each residential flat building.
- Study nooks that are enclosed with walls and doors will not comply with BCA requirements for light and ventilation e.g. unit B1.501
- There is no commercial kitchen on any of the levels of the Aged Care beds, so meal preparation will need to occur on ground level.
- Section 92 of SEPP (Housing) 2021 requires the consent authority to be satisfied that the development includes appropriate measures to separate the club from residential areas to avoid land use conflicts prior to granting consent. Insufficient information has been provided to assess the acoustic impacts and light spill from the registered club and the athletics track. In particular the athletics track is in close proximity to the seniors living development and likely to have light spill from flood lights and acoustic impacts from the use of PA systems and amplified music for events.

Urban Design and Architecture

- There is an overwhelming visual dominance of car parking at ground level across the whole development.
- The villas all have garages facing the internal laneway. Garages make up the majority of the ground floor elevations, with very few living areas providing a visual connection and passive surveillance to the laneway. Driveway areas are occupied by external car parking, which makes the internal streetscape appear like an extensive car park.

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- The architecture of the villa units is very poor. The villa unit buildings have 4 garages at ground level topped with box-like prisms at the upper level punctuated by windows or door openings. The villa units look like small industrial units with garages protruding in the front. There has been little attempt to use any traditional residential architectural features or materials to provide a more home-like or human scale to the villa unit buildings.
- There is ground level car parking in the residential flat buildings, which does not contribute to the streetscape or provide any active frontages or visually appealing building elements at pedestrian level.
- The ground level parking of the RFBs and the shared facilities of Building 2 extend beyond the residential building footprints of level 1. There are large areas of flat roof decking that will be visible to the units above and will reflect a lot of light and heat. This is a poor design outcome in terms of visual impacts to residents as well as unsustainable climate impacts. These roof areas could be landscaped and made trafficable to accommodate common open space and reduce the effects of heat and light.
- The design resolution of the ground floor facade of Building 2 is poor. Pedestrian entries to buildings are not articulated. Glass curtain walls are proposed to common areas facing west, which will lead to unacceptable heat loads in warmer seasons.
- The facades on upper levels of the parts of the building containing the aged care beds could be better resolved. There is a lack of connection with the ground level podium. The grey walls are punctuated by windows but little else has been done to provide an aesthetically pleasing design.
- The overall design approach to each of the four buildings is the same. There is little differentiation in the facades and the main architectural feature seems to be the lift core and overrun. Pedestrian entries are not well articulated in the building form. Way finding will be difficult considering each building looks so similar.
- There seems to be little attempt to address the different orientations of each building with no shading screens provided to the east and west, and no visible difference between the north and south. This approach is similar to the hotel where each elevation is the same, and no acknowledgement of climate is evident.
- Building 4 in particular is of concern as it is approximately 77m long and will be an imposing building form on the site. The façade treatment does little to break up the visual bulk and scale of the building. There is little provision for landscaping to soften the appearance, especially at ground level where the car parking areas provide no activation to the internal 'streets'.

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Solar Access

- The Central Coast region has a requirement of 70% of apartments in RFBs to receive a minimum of 3 hours solar access to living areas and private open space in mid-winter (not 2 hours). A minimum of 70% of apartments will not achieve a minimum of 3 hours solar access due to the orientation of the buildings and as the buildings overshadow themselves. The taller the building the greater the effects of overshadowing of communal open spaces and the greater the separation distances between buildings that are required.
- The solar access diagrams and calculations are incorrect as they include the villa units. The villa units do not qualify to be a residential apartment development as defined under the SEPP Housing and can not be used in the solar access calculation for the RFBs.

Cross Ventilation

- Similar to solar access, cross-ventilation diagrams and calculations are incorrect as they include the villa units. The villa units do not qualify to be a residential apartment development as defined under the SEPP Housing and can not be used in the cross ventilation calculation for the RFBs.
- The unit in the corner of building 4 has been incorrectly calculated as having cross-ventilation even though it is a single aspect unit.

Inconsistent/Insufficient Information

- The number of staff for the Residential Care Facility is inconsistent between the application documentation, which states in some documentation that the number of staff will be 10, 12 or 15.
- No detailed floorplan for Building 3, Level 5.
- The EIS indicates Stage 1 includes Buildings 1-3 and Villas 1-6 as well as the drainage and earthworks in the southern and western portions of the site and the landscaping and road works within the north-eastern corner of the site and the pathways connecting to the hotel. However, the Architectural Plans only show Buildings 1-3 and Villas 1-6 in Stage 1, while the remainder of the works are not shown to be in any stage.
- There are inconsistencies in the location of front doors and gates between the landscape plans and architectural plans.

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TRAFFIC AND TRANSPORT

Vehicle Access

- There is no provision for vehicle turning within the site. The proposed driveway layout is not even sufficient for a holiday park layout or manufactured home estate. Residential flat development requires vehicle access to each and every building for waste removal, emergency services, fire trucks and car parking. Suitable turning heads at the dead ends are required for waste, ambulances, fire and removalist trucks. There is currently not even a sufficient turning head for cars to turn around.
- The site does not have any vehicle access by formal roads. The proposed density is extreme for a site without any roads. The existing access roads through Mingara Recreation Club become congested during peak periods and have poor traffic flow through the site.

Parking

- The proposal includes a significant amount of stacked parking. The stacked parking in front of the villa garages is impractical as it blocks access to the garages. Some of the stacked parking shows 3 car spaces in front of 2 garages. Even if the parking is only used by the residents of the villas with garages, 2 cars would need to move for 1 car to access the garage – see Figure 1.
- Some of the car parking spaces have trees located in the centre, garden beds partially located in car parking spaces, some car spaces have no driveway access or will conflict with other parked cars when manoeuvring into the parking space (Figures 2-4).

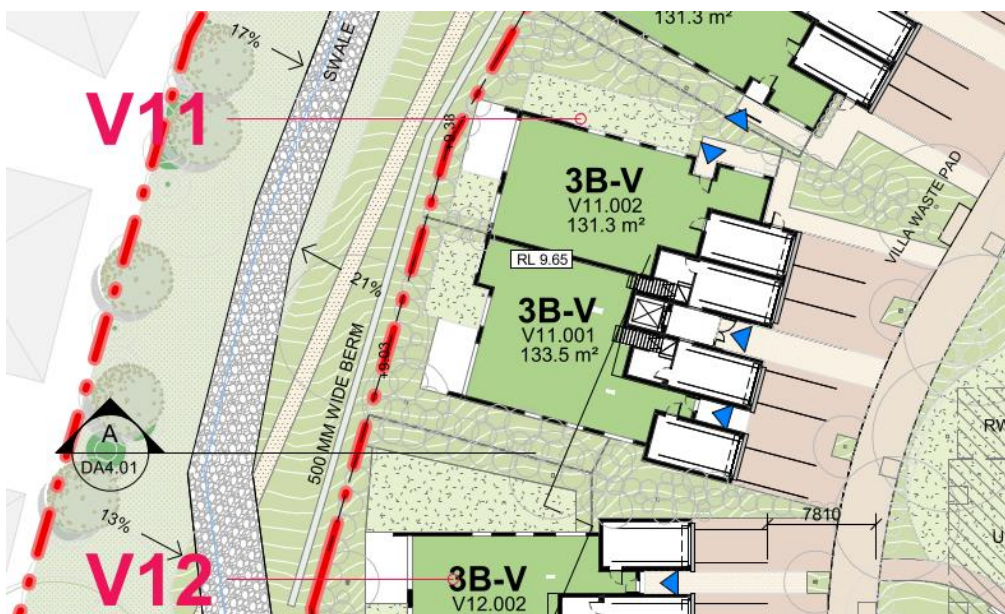


Figure 1: Villa building 11 showing 3 spaces in front of two garages, requiring 2 cars to be moved to access the garage. Note also the tree planted in the centre of the access to the middle space.

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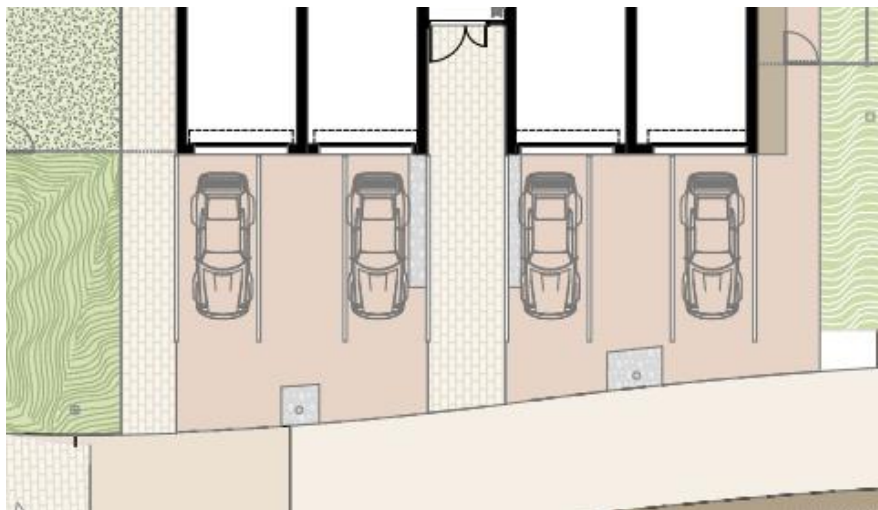


Figure 2: Trees and garden beds located within the carparking spaces or prevent access to the carparking spaces.

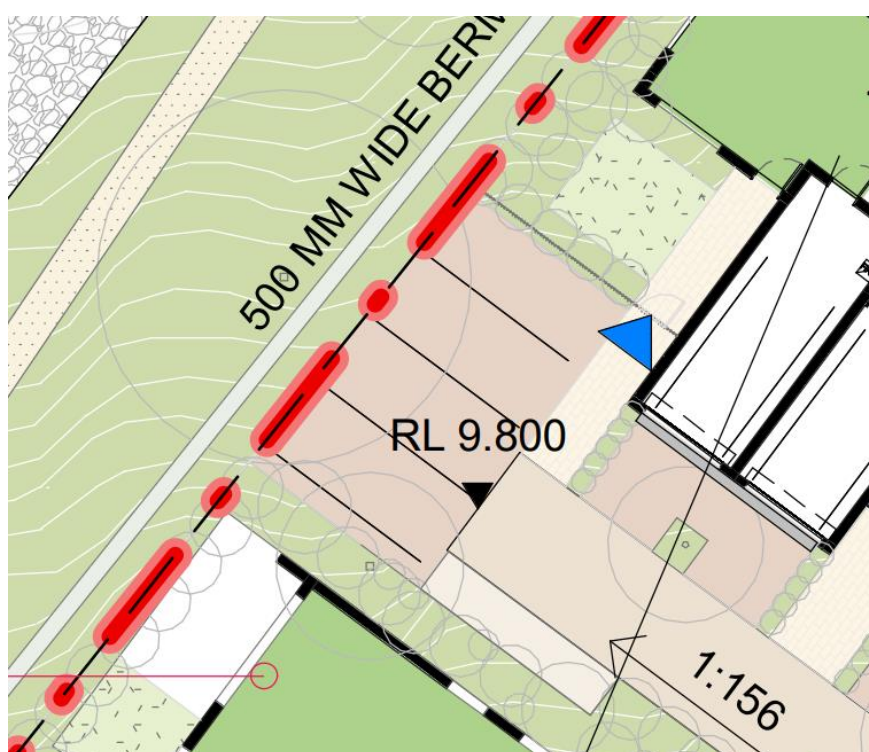


Figure 3: Carparking spaces have no driveway access

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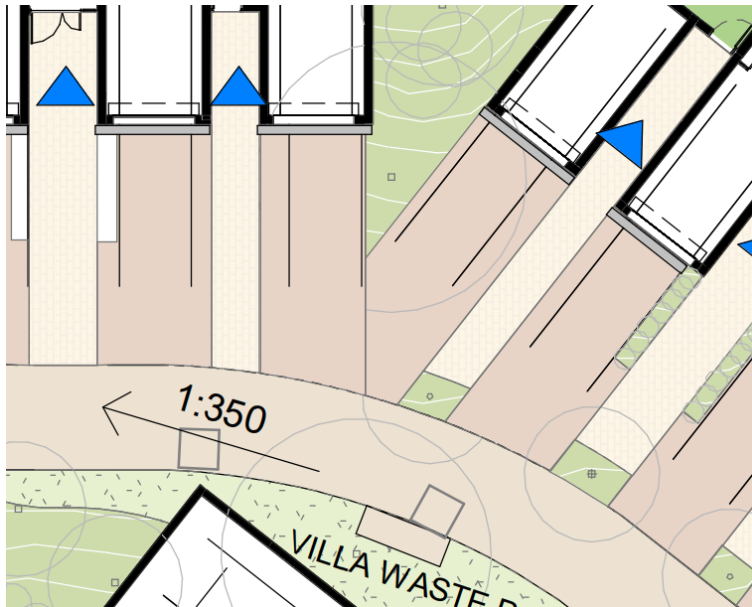


Figure 4: Carparking spaces conflict with each other and prevent manoeuvring.

- It is not clear from the documentation how many staff will be on duty in the development. There are conflicting numbers between the submitted documentation, varying from 10-15 in the RACF. For 3 levels of aged care beds and 1 level of aged care facilities including a kitchen, the likely number of employees is at least 15. Therefore, a minimum of 8 staff car parking spaces are required and only 5 have been provided.
- The seniors living development is proposed to be located within the grassed parking area for the athletics track. The Traffic Report states that there is sufficient existing parking on the site, however, there is only the 2 spaces that are located near the track. The loss of parking should be accommodated within a convenient location near the track which provides safe access for families (close to and not crossing main access roads to Mingara). It is noted that the athletics track currently has approval for 1000 people. The aerial photograph in Figure 5 shows the extent of the grass area currently used for parking during events at the athletics track. Figure 6 shows the proposed walking routes from the proposed parking areas for the track if the seniors living development is constructed. These parking areas are not considered to be safely and conveniently located for athletics track parking.

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Figure 5: Cars parked on the grass near the athletics track on Thursday, 18 August 2022



Figure 16: Walking Routes from Parking Areas to Track

Figure 6: Proposed walking routes to the track after construction of the seniors living development

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- The development consent for the athletics track required the provision of set-down areas and buses. The proposed reconfigured access to the athletics track and two parking spaces are not sufficient for set-down areas and a bus area for the athletics track.
- There are no disabled parking spaces provided for the athletics track. The provision of disabled spaces located within a safe location close to the front entry is required.
- There is no provision for caravan parking, boat parking or visitor parking.
- A number of the villa garages include circulation space to multiple doors. Given the size of the garages there is not sufficient space to park a car and allow for access to the doors.

WATER AND SEWER

Water and sewer services are available to the land, but based on initial investigations there is insufficient water and sewer reticulated main capacity to adequately service this pre development proposal.

As such this proposal is not currently supported by Water and Sewer until it can be demonstrated that the proposal can be adequately serviced with Water and Sewer. A water and sewer servicing plan is to be prepared and provided including point of connection to Council mains, location of conduits between Council mains and the proposed consolidated lot, easements for services. Once received, further feedback can be provided.

Note:

- A Torrens title subdivision is proposed, each unique lot is to be separately connected to Council water and sewer services.
- Connection off other private services in the vicinity is not permitted.
- Pressure tests were previously obtained by Triaxial in 2022 for Mingara Fire fighting requirements and could assist site investigation.
- The WM's in Thornbill Grove are within a different supply zone to Mingara Drive.
- Water supply pressure statement(s) can be applied for on:
<https://www.centralcoast.nsw.gov.au/council/forms-and-publications/form/water-pressure-statement-application>
- Ensure that the proposal will not impact the fire fighting compliance of nearby developments like Mingara and Glengara Village.
- The recently constructed Hotel connected to the 225mm main on the southern boundary with 25.8ET loading.

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Figure 7: Services



Figure 8: 225mm main on the southern boundary with 25.8ET loading

Once the proposal is demonstrated it can be adequately serviced with water and sewer, Water Authority requirements will apply of a Section 305 application being required to obtain a Section 307 Certificate of compliance. The resulting Section 306 letter of requirements will contain Water Authority conditions.

This will include:

- Payment of developer contributions for each stage. Current rate is \$6,822.14 per Equivalent Tenement (ET) and subject to change. For more information refer to:

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<https://www.centralcoast.nsw.gov.au/plan-and-build/plumbing-and-sewage/water-and-sewer-development>

- Building in proximity to Engineering requirements for structures proposed within the zone of influence of Council pipes:
<https://cdn.centralcoast.nsw.gov.au/sites/default/files/Council/Policies/d14133228buildinginproximitytowaterandsewerpipelinesprocedure.PDF>
- Easements required over private pipe.

Prior to issue of any construction certificate

Submit an application to Council under section 305 of the Water Management Act 2000 for a section 306 Requirements Letter. The Application form can be found on Council's website [centralcoast.nsw.gov.au](https://www.centralcoast.nsw.gov.au). Early application is recommended.

The section 305 application will result in a section 306 letter of requirements which must be obtained prior to the issue of any Construction Certificate. The requirements letter will outline which requirements must be met prior to each development milestone e.g. prior to construction certificate, subdivision works certificate, occupation certificate and/or subdivision certificate.

Prior to the issue of any subdivision certificate

Obtain the Section 307 Certificate of Compliance under the Water Management Act 2000 for water and sewer requirements for the development from Central Coast Council as the Water Supply Authority, prior to issue of the Subdivision Certificate.

All water supply and sewer works for the development must be completed and all other conditions of the Section 306 letter satisfied. Completion of works includes the submission and acceptance by Council of all work as executed drawings plus other construction compliance documentation and payment of a maintenance / defects bond to Council in accordance with Council's adopted fees and charges.

CRIME AND SAFETY

Proposals must be designed having regard to strategies relating to surveillance, access control, territorial reinforcement, and space management, identified within *Crime Prevention through Environmental Design* (CPTED).

CPTED refers to the principles specified under the *Crime Prevention and the Assessment of Development Applications* published by Department of Urban Affairs and Planning Guidelines for consideration under section 4.15 of the *Environmental Planning and Assessment Act 1979* as amended. Under this section, all councils are required to consider and implement CPTED principles when assessing Development Applications. In addition, the proposed seniors housing development must meet the design principles in schedule 8 of *State Environmental Planning Policy (Housing) 2021* for crime prevention.

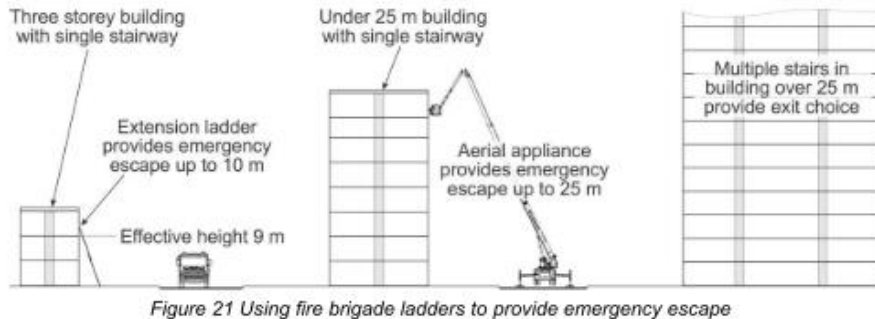
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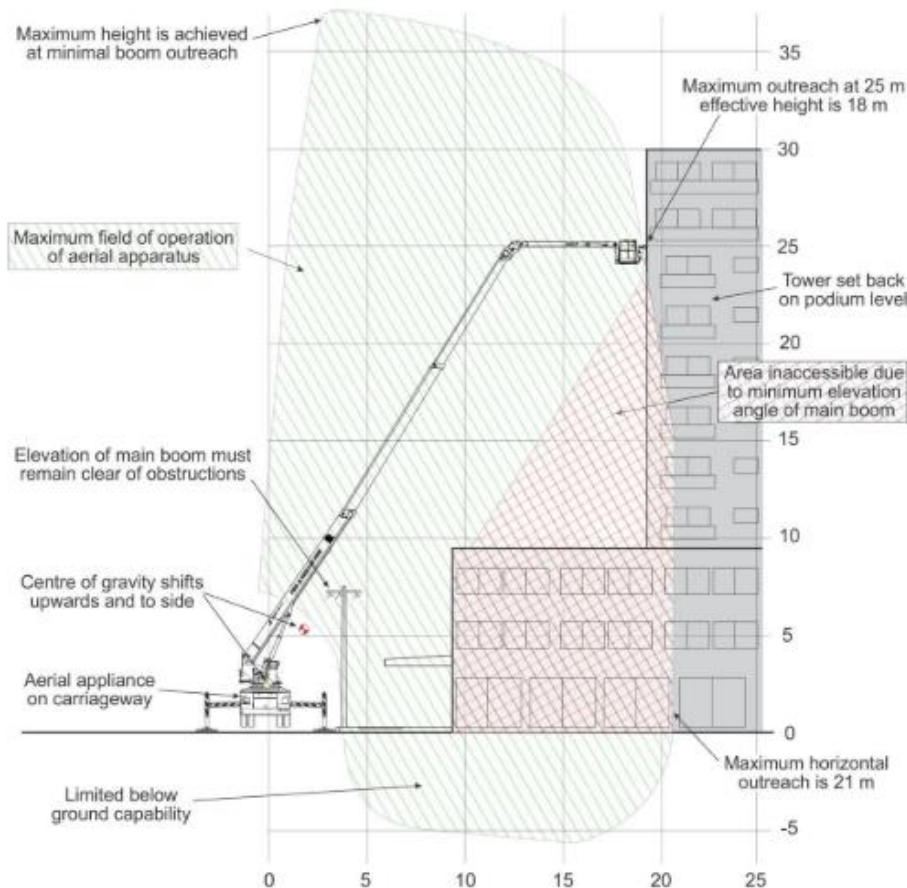
Council's concerns associated with the proposal and in response to the above-mentioned legislation is provided below:

- The proposed seniors housing development does not satisfactorily meet the design principle in schedule 8 of *State Environmental Planning Policy (Housing) 2021* for crime prevention.
- The villas do not provide visual surveillance as they are not designed to allow residents to see who approaches their dwellings without the need to open the front door in accordance with design principle 5(c)(iii).
- Wayfinding through the site is poor. In particular it is noted that most of the villas do not have front doors which provide a clear entry for visitors and emergency services.
- There is no continuous pedestrian footpath through the site to key locations (e.g. waste pads, communal open space, connection to the villas, the footpath around the development and along the drainage area). Residents will generally need to walk on the driveways to get across the site.
- There is no existing road access to the site. Currently it is only accessible via the internal driveways of Mingara. This is an issue because emergency service vehicles will need to slow down to 10km/hr to get to the site, and then they will have to navigate narrow driveways to try and get to the emergency.
- There is no differentiation in the architectural treatment of buildings across the site which will make wayfinding difficult in times of emergency.
- There is no egress from the site in times of flood. This is of particular concern for elderly residents with limited mobility and those confined to the aged care beds.
- The development should have regard for Fire and Rescue NSW Fire Safety Guideline and be designed to cater for a specialist fire appliance as the development includes buildings which are over 9m high. The development has not been adequately designed to provide for:
 - A minimum 6m wide carriageway width is required for a specialist fire appliance.
 - As the development includes dead end carriageways which extend more than 120m a suitable turning head designed for a specialist fire appliance is required at each dead end so that the specialist fire appliance does not need to reverse out.
 - A minimum 6m wide access around the buildings for a specialist fire appliance to set up the fire truck in a clear space close to the part of the building that is on fire as shown in Figure 9.
 - Passing bays are required to allow traffic flow around a fire appliance and for vehicles to pull over to allow a fire appliance to pass.

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10.4.5 An *aerial appliance* has a limited field of operations that requires it to be positioned adjacent to and near the building; any part of a building that is set back from the *carriageway* may be outside the reach of the *aerial appliance* (see Figure 22).



Uncontrolled if printed, copied or emailed. Always check the Fire and Rescue NSW website for the most recent version.

Figure 9: Extract from Fire and Rescue NSW Guidelines showing operation of a specialist fire appliance.

- As part of the site is bushfire prone, the provisions of *Planning for Bushfire Protection 2019* apply. It is noted that the development does not provide adequate access and passing bays in accordance with *Planning for Bushfire Protection 2019*.
- Access should be provided which allows for an ambulance and sufficient area for ambulances to park in an emergency. It is unrealistic for an ambulance to park in the ambulance bay if the patient is in the other buildings or in one of the villas as it increases response time and the distance a patient will need

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to be transported through the site to get to the ambulance. The ambulance bay is also not easily located and is difficult to quickly manoeuvre into.

FLOODPLAIN DEVELOPMENT

The proposed development is for a Seniors Living development within the Mingara Precinct. The site is bound by Mingara Athletics Centre along the north, Mingara Club and Mingara Parking Lots to the east. The applicant has engaged Stantec to prepare a Flood Impact Assessment (FIA) and Flood Emergency Management Plan (FEMP) in support of the development.

The proposed development comprises subdivision of land the construction and operation of a seniors housing development. The proposal includes thirteen villa buildings, three multi-storey independent living unit (ILU) buildings and one mixed high care and ILU building housing communal facilities together with car parking, open space and associated works including site preparation works and landscaping.

The proposed seniors living development is a sensitive use development which is populated by vulnerable people. If this were a Development Application, the applicant would be required to demonstrate that the development satisfies CCLEP cl. 5.21 Flood Planning and CCLEP cl. 5.21 Special Flood Considerations. The applicant is also required to demonstrate that the development is consistent with the principles of the Floodplain Risk Management Manual 2023 and Floodplain Risk Management Toolkit 2023.

Flood Impact Assessment (FIA)

The applicant is required to demonstrate that the development would result in a negligible flood impact. The applicant has used the existing model for the Tuggerah Lakes Southern Catchments Flood Study as a base case for the Flood Impact Assessment.

The 1%AEP flood event partially impacts the development site. Depths range from 10-100mm at the southwestern boundary of the development site to 5mm at the eastern boundary of the development site. Flow velocities through the site typically do not exceed 0.1m/s and the flood hazard is classified as HI in the 1%AEP event, which is safe for the elderly.

The entire development site is located within the PMF flood extent. Flood depths vary through the development site, with a main overland flow path observed running south-west to east through the site. A flood hazard of H1-H3 is observed through the development site, with only a minor portion at the south-western boundary being classified as a H3 hazard.

To eliminate flood impacts as a result of the development, additional flood storage has been provided to the south of the development site. There is a minor depression in the surface in the existing site which acts as a swale to direct flows around the development site. The applicant proposes to lower the existing levels by approximately 600mm to create additional storage volume and eliminate impact to downstream properties.

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There is a negligible flood impact during the 1%AEP event. This can be attributed to the additional flood storage to the south and east of the development site. Minor localised increases in flood level are observed to the south-east of the development site within the Mingara Club site of approximately 10-20mm. The development site itself is flood free during the 1%AEP flood event in the post development scenario.

The development site is flood free during the PMF event, which is a result of the increased flood storage to the south of the development. There is an increase of approximately 40mm generally observed immediately to the south and west of the development site in the PMF event. The existing constructed wetland to the north has an increase in flood levels of 25-30mm and a minor portion of Caralee Place, Thornbill Grove and Sandpiper Way also have an increase in flood levels of 20mm. There does not appear to be any change in Hydrological Flood Categorisation in these properties during the PMF event. These properties were H1 in the existing scenario and remain H1 in the post development scenario. The swale to the south of the site has an increase in flood hazard in the post development scenario as it has been made deeper to increase flood storage. It is accepted that this is not trafficable by pedestrians.

Central Coast Council Flood Engineer Conclusion and Recommendation

The Flood Impact Assessment has demonstrated that the 1%AEP and PMF Flood Impacts from the site are acceptable.

As the development site is flood free during the PMF event, the floor levels are acceptable. The applicant has not considered a climate change flood impact scenario. It is recommended that the applicant undertake a Climate Change Flood Impact Assessment consistent with NSW Flood Impact and Risk Assessment LU01.

Flood Emergency Management Plan (FEMP) - Evacuation from the Site

The Flood Emergency Management Plan (FEMP) details the duration of inundation at certain locations during the Flood Event.

The Wyong Road Site Entrance into the site is classified as a H5-H6 hazard in the PMF flood event. It is assumed that the road crossing over the channel is 110mm during the PMF event. The road as it extends into the site is largely classified as a H3 Hazard. As per Table 3 of the FEMP, the Wyong Road Site Entrance will not be trafficable for a 1 hour period between minute 40 and minute 100.

Wyong Road itself is inundated in the PMF event between the intersection of Beckingham Road and Wyong Road and the intersection of Peach Ave and Wyong Road. High Hazards of up to H5-H6 are observed in the PMF event. As per Table 4, Wyong Road west of the proposed development up to Beckingham Road and Wyong Road will be cut off by H5 floodwaters for 80 minutes between minute 10 and minute 90. As per Table 5, Wyong Road east of the proposed development site up to Peach Ave will be cutoff by H4/H5/H3 floodwater for an extended period between minute 20 and minute 295.

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The Mingara Drive Entrance into the site largely classified as a high hazard zone with a H4-H5 classification due to its proximity to the Tumby Umbi Creek. It is not considered by Stantec to be a suitable access point to the site given the extended duration of high hazard flows observed along Mingara Drive in the PMF event.

Stantec proposes that the most appropriate evacuation procedure is vertical evacuation or shelter in place. The Mingara Club is located immediately south of the proposed development site and is located outside of the PMF flood extent. The Mingara Club is currently used as a refuge shelter and protocols are in place to ensure occupants of the site are moved to the Club in the event of flooding. It is classified as a High Flood Island in the Tuggerah Lakes Southern Catchments Flood Study. It is expected that occupants are to remain within the club until floodwaters recede and it is safe to leave. This is expected to be less than 3 hours.

The Flood Emergency Management Plan does not reference the duration of flooding in events other than the PMF event. According to the Tuggerah Lakes Southern Catchments Flood Study 2018, Wyong Road east of the proposed site will be subjected to H5 flood conditions during the 1%AEP event, H3 flood conditions during the 5%AEP event and H2 conditions during the 20%AEP event. While the duration of inundation during these events is likely to be less than that of the PMF, it is fair to conclude that should these events occur, Mingara site could not be accessed from the east on Wyong Road for a certain period. There appears to be continual safe access to the Site from the west during all flood events up to and including the 1%AEP event.

Floodplain Risk Management Toolkit 2023

The Flood Risk Management Guideline EM01 states that the consequences associated with failed evacuation of developments with vulnerable occupants (eg. aged care) need to be considered and inform suitability of land use and permissible development types to minimise the Emergency Management risk to occupants and staff. It recommends identifying areas with less flood related constraints for the location of developments with more vulnerable occupants.

The Mingara Site is classed as a High Flood Island by the Tuggerah Lakes Floodplain Risk Management Study and Plan 2018. The entire site would be cut off during a PMF event. It is reasonable to assume that a significant proportion of occupants may require frequent medical attention and regular access to hospital. Ambulance access to the Mingara precinct will be cut off during the 20% AEP, 5% AEP and 1%AEP events.

Central Coast Council Flood Engineer Conclusion and Recommendation

Due to its lack of safe evacuation the seniors living development at this location would not be consistent with the recommendations of the Floodplain Risk Management Toolkit 2023. The development fails to satisfy CCLEP cl. 5.22 Special Flood Considerations due to its lack of safe evacuation for vulnerable occupants.

RECORD OF PRE-DEVELOPMENT ADVICE



WASTE

- All the waste from the buildings and villas are proposed to be transferred to the temporary waste collection rooms in Building 2 for collection. A single waste collection point is not practical for this size development. Given the amount of waste likely to be generated each building should provide a collection point for a HRV to access and collect directly from the building.
- The proposed compaction of bins can be supported. However, the over compaction of bins can lead to bins that are too heavy to be moved and can create manual handling issues for staff and collection personnel.
- There is no indication of any bulk waste storage within any building or any of the villas.
- The temporary bin rooms are inaccessible while the waste truck is parked in the waste loading bay which prevents the bins from being moved from the waste room to the rear of the truck for emptying.
- The swept paths indicate that the waste truck will need to drive off the road when turning into the driveway in front of Building 2. The swept paths also show that the waste truck will hit the wall of the loading bay when leaving.
- The shared ambulance bay and waste truck loading bay is not supported. Given the number of bins, the waste truck could be in the loading bay for 20 minutes and would not be easily moved quickly in the event of an emergency.
- Swept paths are currently shown for a 10.5m vehicle. Council's Waste Guidelines require swept paths for a 12.5m HRV.
- A minimum 3.5m clear vertical height clearance must be provided in all waste vehicle manoeuvring areas and collection points. The vertical clearance within the manoeuvring areas and collection points must be free of ceiling services and utility installations.
- The proposed waste loading area is insufficient and does not provide enough clearance around the truck for the collection staff to manoeuvre bins from the temporary bin holding area to the rear of the truck.

Waste - Proposed Villa Accommodation

- Operational waste management details have not been submitted for the proposed villas.
- The waste pads within the villas should be screened and landscaped to reduce the visual impacts of the bins and have safe pedestrian access to the bins for residents.
- HRV waste truck access has not been shown to all the villas. There is no indication of a turning point or "through road" to allow forward access for the HRV waste truck. Truck access must be shown via a swept travel plan analysis and provide forward access and a turnaround point at the end of each lane.

RECORD OF PRE-DEVELOPMENT ADVICE



- Supplied WMP indicates a "caretaker will be responsible for collection bins from each "pad" and taking them to the temporary waste storage area in Building 2. This may not be the most efficient service and operational requires manual handling of bins that potentially can be collected from the "collection pads"

Waste - Proposed ILU's

- Chute access must be via a dedicated service room, not a cupboard in a hallway for all buildings.
- Residents must not have to travel more than 2 floors or 30m to access an interim storage room to deposit waste/recycle/FOGO material.
- The proposed chutes in Buildings 1 and 3 do not appear to line up. The location of the chutes in the waste room is wider/further apart than what has been indicated on the floors above.
- There is no bulk waste storage room for all buildings and a collection point.
- The proposed bin tug parking area and travel path shown in the WMP may not be suitable for the proposed bin tug.
- No details of the type of bin tug proposed to be used has been provided.
- The chute discharge room in Building 2 appears to be congested and double stacking of bins is not supported. The consolidation rooms/chute discharge rooms must be adequately sized plus an additional 70% of room to allow for the safe movement of bins within the storage room.
- The commercial waste storage is insufficient and not large enough for the proposed bins.
- Residents in Building 2 are unable to access the bin storage room.
- The chute of Building 3 does not appear to discharge into a bin.
- Chute discharge points have not been shown on the plans for Building 4.
- Bin stacking is not supported. Access should be available to all bins all the time.
- There is no resident access to bin room in Building 3 and bin room A in Building 4.

The issues identified in this correspondence are brought to the attention of the Department for consideration in the detailed assessment of the proposal. In doing so, it is acknowledged that these issues, and any other issues raised by state government agencies or via public submissions, will be duly assessed by the Department in their overall consideration of the application under a merit assessment. It is requested that Council is re-notified if any amendments to the application are publicly re-notified.

RECORD OF PRE-DEVELOPMENT ADVICE



For further clarification, contact the undersigned on 0439 136 835.

Regards

A handwritten signature in black ink, appearing to read "Antonia Stuart".

Antonia Stuart
Section Manager
DEVELOPMENT ASSESSMENT UNIT