

Our Ref: ID 2766
Your Ref: PP-2024-101 Ref-3290

3 December 2024

David Kiernan
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Goulburn NSW 2580

Via email

email: david.kiernan@goulburn.nsw.gov.au
CC: dylan.whitelaw1@ses.nsw.gov.au

Dear David,

Planning Proposal for 292 Rosemont Road, Boxers Creek

Thank you for the opportunity to provide comment on the Planning Proposal for 292 Rosemont Road, Boxers Creek. It is understood that the planning proposal seeks to *amend the Goulburn Mulwaree Local Environmental Plan (LEP, 2009) to change the land use zoning at the site from RU6 Rural Transition to part R5 Large Lot Residential, C2 Environmental Conservation and the remaining land to retain the RU6 Rural Transition zone. A minimum lot size of 2 ha is proposed for the R5 zoned land, 20 ha to be retained on the RU6 zone and 100 ha for the C2 zone. The lot configuration results in a total of 4 future lots with a minimum lot size of 2 ha. The lots will not be connected to Council water and sewage mains and will be largely self-contained.*¹

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunamis in NSW. This role includes, planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

The consent authority will need to ensure that the planning proposal is considered against the relevant Section 9.1 Ministerial Directions, including 4.1 – Flooding and is consistent with the NSW Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines, including the Support for Emergency Management Planning. Key considerations relating to emergency management are outlined in Attachment A.

¹ GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, Rev B, page 5 and 7

It is understood that a Gateway Determination has been issued on 5 August 2024, subject to conditions, including the requirement for Council to address “*evacuation of the site including the consideration of providing an emergency access/egress point off the Hume Highway directly onto Rosemont Road, which can be accessed by emergency services during flood events.*”² **We refer to our previous response dated 29 April 2024, with reference ID2404.**

Part of the site, specifically Lots 1, 2 and 3 appear to remain flood free up to the Probable Maximum Flood (PMF), and the largest lot, Lot 4, is impacted by high hazard flooding, up to H6 hazard level in a 0.05% Annual Exceedance Probability (AEP) event.³ We note however that all proposed dwelling pads are located outside of the PMF extent.

Noting that the site internal roads are proposed *to be flood free for events up to and including the PMF event*⁴, we would like to **emphasise** that the broader road network that provides access/egress to/from the site is flood affected. The site becomes isolated due to Rosemont Road (both east and west of the site access point) becoming inundated at multiple locations⁵ from local creek and overland flooding. Further, the site becomes isolated from Goulburn CBD with multiple access roads being cut due to mainstream flooding of the Mulwaree and Wollondilly Rivers, some in events as frequently as 20% Annual Exceedance Probability (AEP)⁶, including Bungonia Road, Hume Highway bridges, Sydney Road bridge and Braidwood Road, along with multiple access roads around the CBD,^{7 8 9} thus limiting access to critical services such as hospitals located in Goulburn. Isolation in this area due to riverine flooding can be up to 3 days.¹⁰

Further, the flood assessment states that “*the effects of changes in imperviousness associated with potential future development are considered negligible (..) and were not assessed in the flood model*”, retaining the proposed conditions flood model as per existing conditions with no modifications of the model.¹¹

² Department of Planning, Housing and Infrastructure. 2024. Gateway Determination - Planning proposal (Department Ref: PP-2024-101): Rezone and amend Minimum Lot Size at 292 Rosemont Road, Boxers Creek, 1(b)

³ GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, Rev B, Figure A6

⁴ GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, Rev B, page 11

⁵ GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, Rev B, Figure D1 and Table 4, page 13

⁶ GRC Hydro. 2022. Goulburn Floodplain Risk Management Study and Plan. Version 6 – Final Report, page 39

⁷ GRC Hydro. 2022. Goulburn Floodplain Risk Management Study and Plan. Version 6 – Final Report, page 39

⁸ GRC Hydro. 2022. Goulburn Floodplain Risk Management Study and Plan. Version 6 – Final Report, Appendix C

⁹ WMA Water. 2016. Wollondilly and Mulwaree Rivers Flood Study, Figure 44

¹⁰ GRC Hydro. 2022. Goulburn Floodplain Risk Management Study and Plan. Version 6 – Final Report, page 39

¹¹ GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, page 8

In summary, we:

- **Recommend** seeking advice from the NSW Department of Climate Change, the Environment, Energy and Water (DCCEEW) in relation to the suitability of the modelling pre-/post-development conditions assumption in relation to the impacts of the proposed development on flood behaviour at the site and on adjacent and downstream areas.
- **Emphasise** that the proposed site could be isolated from Goulburn for up three days and **recommend** if development is pursued and any infrastructure upgrades are being considered (as per the Gateway conditions), that these are in place prior to development occurring to avoid the risks of placing future residents in an area at risk of frequent and potentially long duration of isolation.
- **Recommend** investigating upgrades to the wider road infrastructure to support the existing and future communities.
- **Emphasise** that the proposed risk mitigation measures for secondary risks, such as the provision and maintenance of a Home Fire Safety Kit, Automated External Defibrillator and First Aid Kit¹², heavily rely on the ability of these measures to be implemented and maintained in a private ownership context where there is no external audit or monitoring¹³.

Please feel free to contact Ana Chitu via email at rra@ses.nsw.gov.au should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,



Elspeth O'Shannessy
Manager Emergency Risk Management
NSW State Emergency Service

¹² GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, page 20

¹³ GRC Hydro. 2023. 292 Rosemont Road, Boxers Creek, Planning Proposal – Flood Assessment, page 21 and 25