



Hawkesbury City Council

attachment 3
to
item 30

Public Authority Responses

date of meeting: 28 February 2017

location: council chambers

time: 6:30 p.m.

Philip Pleffer

From: Cornelis Duba <Cornelis.Duba@endeavourenergy.com.au>
Sent: Wednesday, 24 August 2016 12:27 PM
To: Hawkesbury City Council
Cc: Jeffrey Smith
Subject: HAWKESBURY CITY COUNCIL PLANNING PROPOSAL LEP006/15 RE Various Properties Richmond Lowlands and Richmond
Attachments: Safety+clearances_May+11.pdf; Safety+on+the+job.pdf; FactSheet_Building_Construction+web.pdf; work_near_underground_assets_1419[1].pdf; work_near_overhead_power_lines_code_of_practice_1394%5B1%5D.PDF; emf-what-we-know-jan-2014-final_1_1.pdf; Template - General Restrictions for Overhead Power Lines.pdf; MDI0044%5B1%5D.PDF

The General Manager
Hawkesbury City Council

ATTENTION: Philip Pleffer, Strategic Planning Co-ordinator

Dear Sir or Madam

I refer to Council's letter of 20 July 2016 regarding Planning Proposal LEP006/15 for various properties Richmond Lowlands and Richmond to Amend the Hawkesbury Local Environmental Plan 2012 (the LEP) in order to allow for a range of additional uses on land known as the Sydney Polo Club and some adjoining land. The planning proposal also seeks to -increase the permissible building height on two allotments on the site from 10 metres to 13 metres. Submissions need to be made to Council by 5 September 2016.

As shown in the below site plans from Endeavour Energy's G/Net master facility model there is significant low and high voltage electricity infrastructure over (including easements for existing overhead power lines indicated by red hatching) and in the vicinity of the site. Please note the location of any electricity infrastructure, boundaries etc. shown on the plan is indicative only and this plan is not a 'Dial Before You Dig' plan under the provisions of Part 5E 'Protection of underground electricity power lines' of the Electricity Supply Act 1995 (NSW).

Endeavour Energy has no objections to the Planning Proposal. Its recommendations and comments are as follows:

- Network Capacity / Connection

Supply will need to be provided from Endeavour Energy's East Richmond Zone Substation located at 56 Blacktown Road, Richmond (Lot 22 DP 1127580) which is approximately 5 kilometres by road south east from the site. Depending on the range of additional permitted uses, adequate capacity may not be available from the existing feeders / low voltage network ie. the future development may require augmentation or extension of the network in order to connect the load.

Endeavour Energy's Capacity Planning section have advised that whilst they have not undertaken a detailed load assessment, at this point in time the two 11,000 volt / 11kV feeders ER1252 and ER1122 that traverse the site both have some spare capacity for additional load, but this will depend on the size of load. The applicant should note that Endeavour Energy does not reserve capacity and therefore cannot provide firm commitments to enquires. In cases where augmentation works are required this may involve considerable lead times for design, environmental assessment, approvals and construction.

Accordingly, in due course the applicant for the future proposed development of the site will need to submit an application for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined. Depending on the outcome of the assessment, any required padmount substations will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling) by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please find attached for the Panels' reference a copy of Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'. Further details are available by contacting Endeavour Energy's Network Connections Branch via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link:

<http://www.endeavourenergy.com.au/>

- Asset Relocation

If required to facilitate the future development of the site, advice on the possible relocation of the existing electrical assets on the site can be obtained by submitting a Technical Review Request to Endeavour Energy's Network Connections Branch, the form for which FPJ6007 is attached and further details (including the applicable charges) are available from Endeavour Energy's website via the following link under 'Our connection services':

<http://www.endeavourenergy.com.au/>

Alternatively the applicant future development of the site should engage a Level 3 Accredited Service Provider (ASP) approved to design distribution network assets, including underground or overhead. The ASP scheme is administered by NSW Trade & Investment and details are available on their website via the following link:

<http://www.resourcesandenergy.nsw.gov.au/energy-supply-industry/pipelines-electricity-gas-networks/network-connections/contestable-works>

- Easement Management / Network Access

Please find attached for the applicant's reference a copy of Endeavour Energy's General Restrictions for Overhead Power Lines'. The following is a summary of the usual / main terms of Endeavour Energy's electrical easements / protected electrical works requiring that the land owner:

- o Not install or permit to be installed any services or structures within the easement site.
- o Not alter the surface level of the easement site.
- o Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in accordance with such conditions as Endeavour Energy may reasonably impose.

If the proposed works will encroach/affect Endeavour Energy's easements, contact must first be made with the Endeavour Energy's Easements Officer, Jeffrey Smith, on 9853 7139 or alternately Jeffrey.Smith@endeavourenergy.com.au.

It is imperative that the access to the existing electrical infrastructure adjacent and on the site is maintained at all times. To ensure that supply electricity is available to the community, access to the electrical assets may be required at any time.

- Safety Clearances

Any future proposed buildings, structures, signage etc. must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) as specified in AS/NZS 7000:2010 'Overhead line design - Detailed procedures' and the 'Service and Installation Rules of NSW'. Different voltages are kept at different heights, the higher the voltage, the higher the wires are positioned on the pole. Similarly, the higher the voltage, the greater the required building setback. These distances must be maintained at all times and to all buildings and structures eg. for the erection of scaffolding etc., and regardless of the Council's allowable building setbacks etc. under its development controls, allowance must be made for the retention of appropriate / safe clearances.

- Earthing

The construction of any building or structure (including fencing) that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with AS/NZS 3000:2007 'Electrical installations' to ensure that there is adequate connection to the earth. Inadequate connection to the earth places persons and the electricity network at risk.

- Noise

The electricity network is operational 24/7/365 ie. all day, every day of the year. Overhead power lines can produce an audible sound or buzz as a side effect of carrying electricity. The sound can be louder if there is increased moisture (during rain, fog, frost etc.) or pollutants in the air. The sound usually occurs at the poles at the insulators supporting the power lines. The transformer in substations may emit a hum – especially when under heavy load say in the summer peak when use of air conditioning is at its highest. These sounds are generally not an issue in non-urban / non-residential areas but with increasing density and building heights Endeavour Energy believes it is worth considering. Where development is proposed in the vicinity of electricity infrastructure, Endeavour Energy is not responsible for any acoustic / noise amelioration measures for such noise that may impact on the nearby proposed development.

- Electric and Magnetic Fields (EMF)

Endeavour Energy recognises that a causal link between power-line EMF exposure and demonstrated health effects has not been established, even after much scientific investigation throughout the world. There are no state or federal exposure standards for 50/60- hertz (Hz) EMF based on demonstrated health effects. Nor are there any such standards world-wide. Among those international agencies that provide guidelines for acceptable EMF exposure to the general public, the International Commission on Non-Ionizing Radiation Protection established a level of 1000 milligauss (mG). Endeavour Energy recognises that timely additional research is unlikely to prove the safety of power-line EMF to the satisfaction of all.

Endeavour Energy is committed to ensuring that its activities and assets conform to all relevant International and Australian Standards, National Health and Medical Research Council (NH&MRC) Standards, Energy Networks Association (ENA) Standards and NSW legislation. This includes a commitment to a policy of prudent avoidance as endorsed by the ENA with regard to the location of assets and electric and magnetic fields. Please find attached a copy of ENA's 'Electric & Magnetic Fields – What We Know, January 2014' which can also be accessed via the ENA's website at <http://www.ena.asn.au/>.

Likewise Endeavour Energy believes that Council should also adopt a policy of prudent avoidance by the siting of more sensitive uses away from any electricity infrastructure to minimise exposure to EMF eg. buildings should be designed with habitable rooms away from any electricity infrastructure with these orientations used for non-habitable rooms which by their nature are occupied neither frequently nor for extended periods.

- Vegetation Management

The planting of large trees in the vicinity of electricity infrastructure is not supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure. Only low growing shrubs not exceeding 3.0 metres in height, ground covers and smaller shrubs, with non-invasive root systems are the best plants to use. Larger trees should be planted well away from electricity infrastructure and even with underground cables, be installed with a root barrier around the root ball of the plant. Landscaping that interferes with electricity infrastructure may become subject to Endeavour Energy's Vegetation Management program and/or the provisions of the Electricity Supply Act 1995 (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.

- Demolition

Demolition work is to be carried out in accordance with Australian Standard AS2601: The demolition of structures (AS 2601). All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected ie. the existing customer service lines will need to be isolated and/or removed during demolition. Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. street light columns, power poles, overhead and underground cables etc.

- Dial before You Dig

Before commencing any underground activity the applicant is required to obtain advice from the **Dial before You Dig 1100** service in accordance with the requirements of the Electricity Supply Act 1995 (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical infrastructure across the sites, but also to identify them as a hazard and to properly assess the risk.

- Public Safety

Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. I have attached Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why you may be at risk and what you can do to work safely. The public safety training resources are also available via Endeavour Energy's website via the following link:

<http://www.endeavourenergy.com.au/wps/wcm/connect/ee/nsw/nsw+homepage/communitynav/safety/safety+brochures>

- Emergency Contact

In case of an emergency relating to Endeavour Energy's electrical network, the applicant should note Emergencies Telephone is 131 003 which can be contact 24 hours/7 days.

I appreciate that not all the foregoing issues are necessarily significant in relation to the Planning Proposal, noting that due to flooding and contamination constraints the proposal does not seek to make permissible any sensitive land uses such as residential, schools or a child care facility, however Endeavour Energy's preference is to alert applicants of the potential matters that may arise should further development of the site occur so they can be given appropriate consideration.

Could you please pass on the attached resources to the applicant? Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me or the contacts identified above in relation to the various matters. As I am working on different projects across the company's franchise area, to ensure a response contact by email is preferred.

Yours faithfully

Cornelis Duba

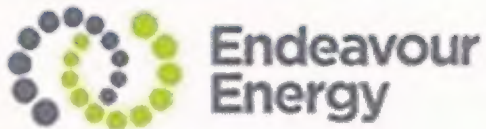
Acting Public Safety Advisor

T: 9853 7896

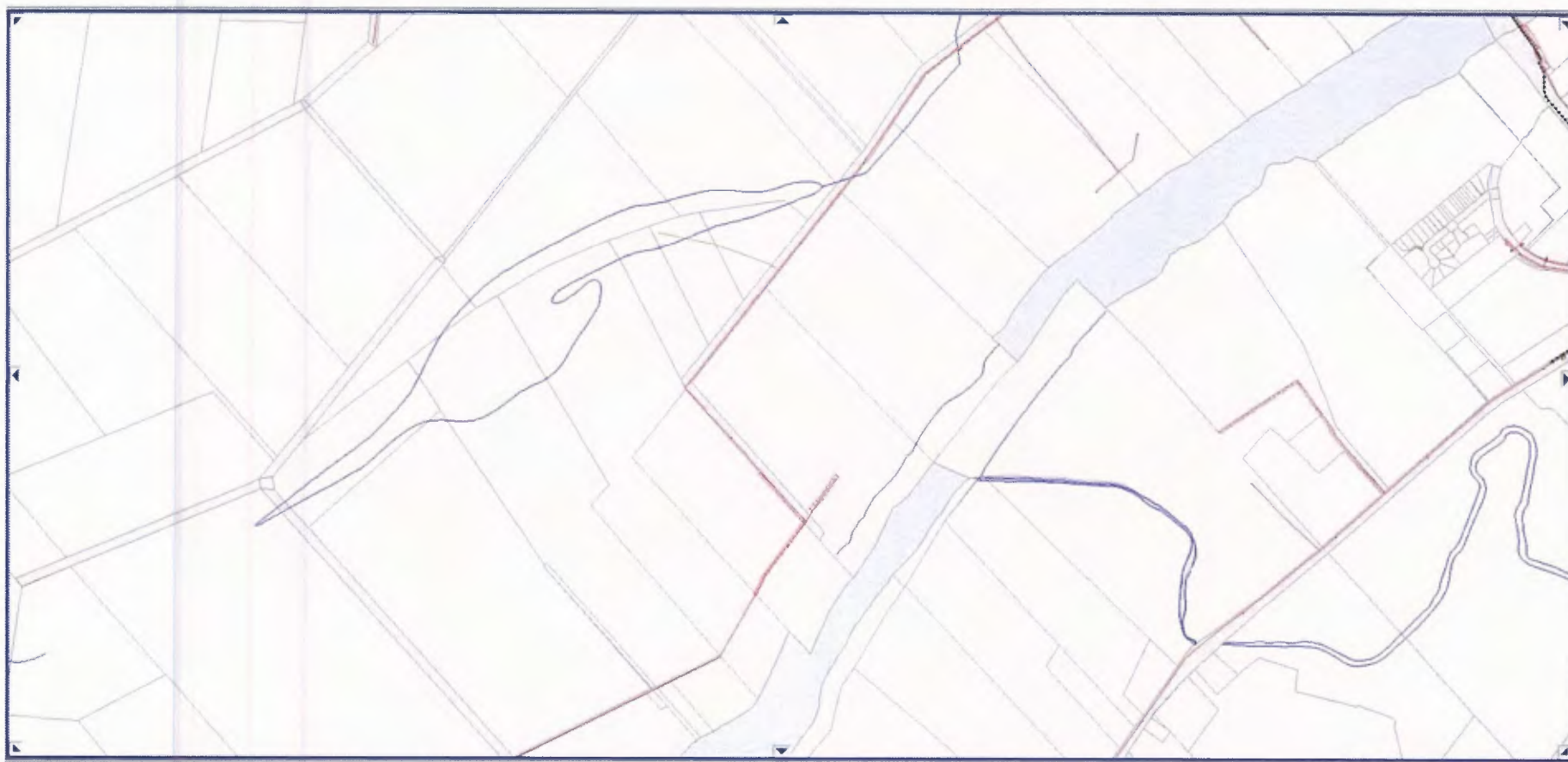
E: cornelis.duba@endeavourenergy.com.au

51 Huntingwood Drive, Huntingwood NSW 2148

www.endeavourenergy.com.au









File No: SF16/ 31288
Ref No: DOC16/ 360914

Philip Pleffer
Strategic Planning Co-ordinator
Hawkesbury City Council
PO box 146
WINDSOR NSW 2756

By email: council@hawkesbury.nsw.gov.au

Dear Philip Pleffer

RE: Planning Proposal to amend Hawkesbury LEP 2012 - Various properties at Richmond Lowlands and Richmond.

I refer to your letter dated 20 July 2016 regarding the abovementioned planning proposal. The planning proposal seeks to amend the Hawkesbury Local Environmental Plan (LEP) 2012 to allow a range of additional uses on land known as the Sydney Polo Club and some immediately adjoining land. The subject site comprises 24 allotments at Edwards Road and Ridges, Cornwells, Triangle, and Powells Lanes, Richmond Lowlands and Old Kurrajong Road, Richmond. The planning proposal also seeks to increase the permissible building height on two allotments on the site from 10 metres to 13 metres.

It is noted that a farm building and fence, identified as items of non-Aboriginal Heritage in Schedule 1 of Sydney Regional Plan No. 20 are located within the subject site. No items listed on the State Heritage Register or Schedule 5 of the Hawkesbury LEP 2012 are situated within the subject site. A Georgian farmhouse at 216 Edwards Road, listed in the Schedule 5 of the Hawkesbury LEP 2012 is located immediately to the north-east of the site.

The planning proposal prepared by JBA Urban Planning Consultants states that no specific development is proposed within the immediate vicinity of the above mentioned items of regional heritage significance. Nevertheless, it is advised that the Hawkesbury City Council as a consent authority give consideration to any adverse impacts on the heritage significance of the items of regional significance located on the subject site and also on the local heritage items in the vicinity of the subject site. Further, the Council should be confident that the proposed development is an appropriate outcome in that location and should ensure that the proposed development does not adversely impact the scenic quality and existing rural character of the locality.

If you have any questions regarding the above matter please contact Vibha Bhattarai Upadhyay, Heritage Assessment Officer, at the Heritage Division, Office of Environment and Heritage on 9873 8587 or at vibha.upadhyay@environment.nsw.gov.au.

Yours sincerely



Katrina Stankowski
Acting Manager, Conservation
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council
26 August 2016

26 August 2016

Phillip Pleffer
Strategic Planning Co-Ordinator
Hawkesbury City Council
PO Box 146
Windsor NSW 2756

Planning Proposal to amend HELP 2012- Various properties at Richmond Lowlands and Richmond.

Dear Phillip Pleffer,

Thank you for notifying Sydney Water of the Planning Proposal listed above. We have reviewed the application and provide the following comments for your consideration.

- Sydney Water generally supports the Planning Proposal.
- Sydney Water notes that the planning proposal does not require connection to the existing water and wastewater systems.
- The proponent is encouraged to submit a feasibility application should they consider connection to the water network or connection to the wastewater network.
- The proponent must engage a licenced Water Servicing Co-ordinator (WSC) to submit a Feasibility Application on their behalf (fees apply). A list of WSCs can be found at the following link:
http://www.sydneywater.com.au/ProviderInformation/wsc/waterserv_ext_print.htm

If you require any further information, please contact Manwella Hawell of Urban Growth Strategy on 02 8849 4354 or e-mail manwella.hawell@sydneywater.com.au.

Yours sincerely,


Greg Joblin
Manager, Growth Strategy



5 September 2016

Phillip Pleffer
Strategic Planning Co-ordinator
Hawkesbury City Council
PO Box 146
Windsor NSW 2756

Emailed: council@hawkesbury.nsw.gov.au

Your Reference: LEP006/15
Our Reference (TRIM): OUT16/32941

Dear Mr Pleffer

**Re: Proposal to amend Hawkesbury LEP 2012
– Various properties at Richmond Lowlands & Richmond**

Thank you for the opportunity to provide advice on the above matter. This is a response from NSW Department of Industry – Geological Survey of New South Wales (GSNSW).

The planning proposal seeks to amend the Hawkesbury Local Environment Plan (LEP) 2012 in order to allow additional permitted uses on land known as the Sydney Polo Club and some adjoining land.

The objective of the planning proposal is to permit a range of additional uses to support the tourism industry, particularly those activities associated with the polo operations. The planning proposal is intended to facilitate delivery of infrastructure to support the upcoming Polo World Cup event.

The subject lands are located within an identified resource area called the 'Richmond Lowlands Sand & Gravel Resource'. The Richmond Lowlands resource is an undeveloped state significant resource of construction sand and gravel. The Richmond Lowlands resource was identified in *Sydney Regional Environmental Plan No 9 – Extractive Industry (No 2-1995) (SREP 9)*. The primary aim of SREP 9 is to facilitate the development of extractive resources in proximity to the Sydney Metropolitan Area and to ensure consideration is given to the impact of encroaching development.

The Richmond Lowlands resource was also included in the NSW State-wide Mineral Resource Audit (MRA). MRA mapping for the Hawkesbury LGA was supplied to Council most recently as a data package in May 2014. The MRA was conducted in accordance with Section 117(2) Direction 1.3 – Mining, Petroleum Production and Extractive Industries under the *Environmental Planning and Assessment Act 1979*. The objective of Section 117(2) Direction 1.3 is to ensure that access to State and regionally significant mineral and extractive resources is not compromised by inappropriate development.

GSNSW concurs with Council's statement in its correspondence (dated 20 July 2016) that the proposal has the potential to "restrict the future winning of extractive resources from the Richmond Lowlands area and surrounds". The proposal could possibly lead to development

that has the potential to restrict access to and may ultimately sterilise a significant part of the Richmond Lowland resource area.

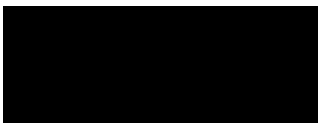
GSNSW notes that with the Penrith Lakes extraction area ceasing production in mid-2015 and the impending progressive re-development of the Kurnell Peninsular, the Sydney Planning Region will require replacement sources of high quality construction sand and gravel. The Richmond Lowlands resource represents a major undeveloped source of fine/medium construction sand and gravel with the potential to supply much of the Sydney Planning Region's ongoing needs.

As GSNSW has noted in previous studies and reports the Richmond Lowlands resources have been the subject of significant environmental and land use constraints including the value ascribed to the land as prime agricultural land, conservation values of various wetlands, and the possible impact of extraction on the Hawkesbury-Nepean River system.

GSNSW acknowledges that Council would need to consider these constraints when assessing planning and development proposals in the Richmond Lowlands area against the benefits of future extraction. Section 12 of SREP 9 contains items specifically related to extractive industry on the Richmond Lowlands that Council should consider when preparing a draft LEP.

Queries regarding the above information, and future requests for advice in relation to this matter, should be directed to the GSNSW Land Use team at landuse.minerals@industry.nsw.gov.au.

Yours sincerely

A black rectangular box used to redact the signature of Cressida Gilmore.

Cressida Gilmore
Manager - Land Use



Office of
Environment
& Heritage

DOC16/367764
LEP006/15

The General Manager
Hawkesbury City Council
PO Box 146
WINDSOR NSW 2756

Attention: Phillip Pleffer

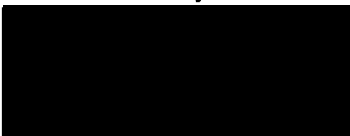
Planning Proposal - Sydney Polo Club, Richmond Lowlands and Richmond

I refer to your letter received 21 July 2016, seeking comments from the Office of Environment and Heritage (OEH) on the Planning Proposal for the Sydney Polo Club.

OEH has reviewed the documentation relating to the above proposal, and provides comments in relation to biodiversity and floodplain risk management at Attachment 1. The Heritage Division of OEH may provide comments separately.

If you have any further questions about this issue, please contact Marnie Stewart, Senior Regional Operations Officer on 9995 6868 or marnie.stewart@environment.nsw.gov.au.

Yours sincerely



05/09/16

SUSAN HARRISON
Senior Team Leader Planning
Regional Operations

Contact officer: MARNIE STEWART
9995 6868

ATTACHMENT 1 – Office of Environment and Heritage (OEH) comments on Planning Proposal for Sydney Polo Club

1. Background

OEH understands that the Planning Proposal (PP) proposes to amend the Hawkesbury Local Environmental Plan (LEP) 2012 to permit a range of uses on the RU2 Rural Landscape part of the site including eco-tourist facilities, shops, function centres, light industries, recreation facilities and veterinary hospitals. The PP will also amend the height of buildings map to enable the development of a two storey function centre on part of the site.

2. Biodiversity

An Ecological Constraints and Opportunities Analysis (EA) was prepared by Cumberland Ecology dated April 2016 to provide a preliminary ecological investigation for the PP. The EA was prepared based on a general site inspection undertaken on one day, but did not involve flora plots or fauna surveys. The EA notes that vegetation around the Hawkesbury River may constitute River Flat Eucalypt Forest Endangered Ecological Community (EEC) which could be habitat for threatened species such as bats. Species such as the Eastern Bent-wing Bat and the Southern Myotis have been found in the vicinity of the site.

The EA further notes that the site contains freshwater wetlands which are zoned E2 Environmental Conservation and identified on the Wetlands and Terrestrial Biodiversity Maps in the Hawkesbury LEP. The wetlands are the EEC Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions. Some remnant native vegetation occurs around the billabong.

The EA describes the freshwater wetlands (billabong) as follows:

It is noted that the billabong might be part of a system of back swamps, marshes and wetlands which stretch across this floodplain from Yarramundi Lagoon to the Richmond Lowlands, within the Richmond floodplain sub-catchment. This system may be an old anabranch of the Hawkesbury River and the possibility exists of sub-surface connectivity amongst these wetlands across the Richmond Lowlands.

The EA states that the wetlands, as well as land adjacent to the Hawkesbury River, may provide habitat for waterbirds and other aquatic species such as turtles, amphibians, fish and insects.

The freshwater wetlands EEC is under threat from activities associated with development such as flood mitigation and drainage works, filling, pollution from urban and agricultural runoff and activation of acid sulfate soils. While the PP applies only to the RU2 land, OEH is concerned that the proposal may adversely impact on the freshwater wetlands (E2 zone) and riparian land (W1 zone) as a result of:

- Changes to the drainage regime of the site (surface and sub-surface);
- Changes to stormwater quality and quantity;
- On-site sewage management;
- Acid sulfate soil disturbance; and
- Filling and flood management works.

OEH considers that it is difficult to appreciate the potential impacts of the PP in the absence of an understanding of the significance of the wetlands and vegetation on the site as habitat for flora and fauna.

OEH therefore recommends that:

- A detailed flora and fauna assessment (F&F) be undertaken which includes all of the RU2, E2 and W1 land (Note: a parcel of land in the western part of the site was not included in the EA study area); and

- The PP includes an assessment of the consistency of the proposal with Sydney Regional Environmental Plan No 20 – Hawkesbury-Nepean River (SREP 20), in particular Section 6 Specific planning policies and recommended strategies.

Flora and fauna assessment

The F&F assessment should be based on survey work by a suitably qualified ecologist, with knowledge and expertise of the species and ecological communities in the area. OEH recommends the F&F assessment includes, but is not restricted to:

- details of the methods, timing and extent of survey work undertaken;
- site specific surveys for threatened fauna and flora species and ecological communities and their habitat;
- identification, including site specific surveys of any F&F species and ecological communities and their habitat which are of local, regional or state conservation significance; and
- maps detailing the remnant vegetation on and adjacent to the site, the classification of these assemblages and possible habitat corridors and vegetation linkages (all maps should be of the same scale and composite maps showing all relevant data should be included in the report).

To identify ecological communities and their condition, reference should be made to any existing ecological or vegetation assessments that have been undertaken in the area. Any regional scale mapping should be ground-truthed and checked.

The F&F assessment should be used as the basis for determining the biodiversity values by assessing the:

- conservation significance of the remnant vegetation communities on site. The criteria for establishing significance should be documented;
- recovery potential and ecological role of cleared land and areas supporting modified vegetation. This should enable further consideration of linkages that could be made as part of the development and assessments of priorities for improving the condition of remnant vegetation on site. In undertaking this assessment it is recommended that relevant areas be compartmentalised into land units classified into categories of high, moderate and low recovery potential; and
- significance of habitat for threatened species and regionally and locally significant fauna and flora species.

These assessments should be compiled into a single map indicating areas of high, moderate or low biodiversity value and it should be used to prediction of the likely impact of planning proposal on the values identified.

Further OEH guidance on threatened species survey and assessment can be found at: www.environment.nsw.gov.au/threatenedspecies/surveyassessmentgdlns.htm

3. Floodplain Risk Management

OEH notes that Council is required to undertake pre-exhibition consultation with the Hawkesbury-Nepean Valley Flood Management Review Taskforce (HN Taskforce) in relation to Section 117 Direction 4.3 Flood Prone Land. Accordingly, OEH will provide comments on floodplain risk management via the HN Taskforce.

(END OF SUBMISSION)



12 September 2016

Roads and Maritime Reference: SYD16/0962 (A14419462)
Council Reference: LEP006/15

General Manager
Hawkesbury City Council
PO Box 146
Windsor NSW 2756

Attention: Philip Pleffer

Dear Sir/Madam,

**PLANNING PROPOSAL TO AMEND HAWKESBURY LOCAL ENVIRONMENTAL PLAN 2012 -
VARIOUS PROPERTIES AT RICHMOND LOWLANDS AND RICHMOND (SYDNEY POLO
CLUB)**

Reference is made to Council's letter dated 20 July 2016, concerning the abovementioned planning proposal, which was referred to Roads and Maritime for comment in accordance with the consultation requirements under Section 56(2) of *Environmental Planning and Assessment Act 1979*. Roads and Maritime appreciates the opportunity to comment on the planning proposal, and apologises for the delay in providing a response.

Roads and Maritime has reviewed the submitted documentation and notes the planning proposal introduces a range of additional permitted uses for the subject site (23 lots) under Schedule 1 of the LEP, in order to legitimise certain uses currently occurring on the site and to also introduce desired future uses for the site. The overall effect would allow the site to be used as a major outdoor private recreational facility for major polo events with ancillary ongoing uses including function centres, light industrial/microbrewery, markets etc.

Roads and Maritime has reviewed the supporting studies and cannot make an informed comment on the impacts of the planning proposal in its current form. In this regard, detailed comments and further assessment requirements are provided at **Attachment A** in relation to the traffic and access impacts of the proposed uses, to be addressed prior to gazettal of the LEP amendments.

If you have any questions in relation to the above matters, please contact the nominated Land Use Planner Rachel Nicholson on phone 8849 2702 or development.sydney@rms.nsw.gov.au.

Yours sincerely,

Greg Flynn
Manager Strategic Land Use
Network Sydney

Attachment A – Detailed Comments on Traffic and Access

1. Roads and Maritime notes that the 'Scenario Two' modelled has considered the traffic impacts of two functions associated with the additional permitted uses occurring at one time. However, the modelling has only considered a Friday PM peak when right turn restrictions are in force for the right turn movement at the intersection from Old Kurrajong Road to Kurrajong Road. Hence, this modelled scenario does not represent the likely worst case traffic impacts at this intersection.

Roads and Maritime requests an addendum to the traffic impact assessment is provided to consider/model traffic impacts for Saturday site peaks for 'Scenario 2'. This would need to assess the potential impacts on the right turn movements at the intersection of Old Kurrajong Road and Kurrajong Road, in the event that two functions/events might occur on a Saturday resulting in increased delays for these critical movements. Roads and Maritime has road safety concerns with the likely increase to the delay for these vehicles, as excessive delays for uncontrolled right turn movements are likely to result in driver frustration and high-risk gap acceptance behaviour.

2. The addendum to the traffic impact assessment should identify any works/treatments required to mitigate any safety or efficiency impacts identified as a result of the proposed intensified uses of the site on an ongoing basis (outside of special event traffic control periods). Any safety and efficiency impacts identified at the intersection of Kurrajong Road/Old Kurrajong Road/Yarramundi Lane intersection would need to be addressed with any treatments identified.
3. Other access route options may also need to be investigated. Road upgrades may be required to cater for elevated traffic flows and increased heavy vehicle activity on the local roads e.g. increased horse floats, large service vehicles associated with the light industrial/brewery uses etc. In this regard, consideration to the suitability, and impacts on the environmental capacity, of local road access routes should be considered (ie Old Kurrajong Road east in the vicinity of Triangle Lane intersection).
4. Electronic files of the Sidra Intersection modelling undertaken to support the planning proposal should be submitted to Roads and Maritime for review.
5. As suggested in the traffic impact assessment, special events such as the annual polo cup and the Polo World Cup in 2017 will require event Traffic Management Plans to address the operational matters of special events onsite, and would need to be submitted to the Local Traffic Committee in accordance with the *Guide to Traffic and Transport Management for Special Events*.

12th September 2016

Hawkesbury City Council
366 George Street
Windsor NSW 2756

Attn:

Dear Mr Pleffer,

Thank you for the opportunity to provide comment on the planning proposal for the Sydney Polo Club development. As you would be aware, the New South Wales State Emergency Service (NSW SES) is the combat agency for floods, storms and tsunamis within NSW. An integral part of this role includes planning for, responding to, and coordinating early recovery efforts from flooding. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, especially where the development may exacerbate existing risk or create new risk areas.

The proposal seeks to intensify recreational and commercial use within an area of extreme flood hazard, including significant increases in high-value livestock. It is noted that the Planning Proposal was updated to exclude 'tourist and visitor accommodation' use on the site given the flood constraints.

The intended uses do add operational complexity to any flood response within the Hawkesbury-Nepean Valley.

Hawkesbury-Nepean Regional Planning Strategy

The NSW Government recently announced the Hawkesbury Nepean Strategy (<http://www.infrastructure.nsw.gov.au/news/currentnews/hawkesbury-nepean-flood-risk-management-strategy.aspx>). Part of that strategy is to develop a Regional approach to land use, road and emergency planning within the Hawkesbury-Nepean Valley. The NSW Government and the Greater Sydney Commission will have a role to play in informing land use planning in the Valley based on region-wide flood modelling and evacuation capacity. The proposed regional approach to land use planning will provide more certainty where there are opportunities to develop across the Valley while accounting for flood risk and risk to life.

A regional land use planning approach is critical to managing the cumulative impact of growth. This is of critical importance to the NSW SES, and significant

development prior to the release of this regional strategy should be discussed with the NSW State Emergency Service and the new Hawkesbury Nepean Flood Risk Directorate within Infrastructure NSW.

Warning

Appendix B to the Planning Proposal states:

Typically occupants on the site have several days warning before a flood [REDACTED] prepare for an evacuation.

Whilst Flood Watches issued by the Bureau of Meteorology often may provide 1-3 days qualitative advice of expected flooding, there are occasions where the Hawkesbury Nepean River system can flood within 24 hours from not only flows along the Nepean River (from the Nepean dams and Warragamba Dam) but also the Grose River just downstream from the proposal area. In any case the Bureau of Meteorology is only able to provide a reliable forecast of a particular height being reached within in 9-15 hours using forecast rain. This, along with the nature of flooding in the proposal area (see below), does make it somewhat problematic in being able to provide precise warnings for the proposal area.

Evacuation

The NSW SES policy is to pro-actively evacuate areas before floodwaters affect the area. Evacuation (rather than rescue) ensures public safety and eliminates the need for time-critical rescue operations due to inundation, resupply operations due to prolonged isolation, and maintains the safety of residents in the face of extended utilities outages. The regional road evacuation network is a common network across the key council areas. Growth in one area can affect the capacity of individuals in other areas to safely evacuate.

Flooding would affect the area usually from the Cornwallis end (due to backup flooding along Rickabys Creek initially). Even though most of the existing dwellings on the site are located on high ground along the river with vehicle access provided from Ridges Lane, these areas would need to be evacuated before local egress routes are flooded.

In Appendix B the proponents state:

Early evacuation from the site to Richmond (via Old Kurrajong Rd or Kurrajong Road) and North Richmond (via the North Richmond Bridge) is recommended prior to the roads and bridges becoming inundated. These

areas are less susceptible to flooding and provide access to regional evacuation routes.

There is limited infrastructure on the western side of the river to deal with evacuees and in any case the North Richmond Bridge is cut in moderate flooding around 8.8m AHD. The designated regional evacuation routes for the proposal area would be Castlereagh Road and Londonderry Road towards Penrith.

The location of the proposed development, within a highly flood-prone area, will [REDACTED] complex evacuations including livestock movement, at lower levels of flooding. This is explained within the proponents document, which details that evacuation will need to take place prior to bridges and key traffic routes being cut. These cuts occur at minor flood levels. All internal roads within the site should be developed to provide rising road access away from floodwaters to avoid people becoming trapped earlier than anticipated.

Increased Operational Complexity

Complexity of operations arises due to the scale, location / accessibility, and severity of an emergency incident. Given the large areas and population affected by flooding in the Hawkesbury-Nepean River Valley, the rescue of significant numbers of people is very difficult. Even with the best evacuation plans, there will still be those residents who require rescue, and this must be taken into account in any consideration of the proposed development. The tourism nature of the development will result in higher populations of people who are unfamiliar with the locale and potentially less likely to appreciate the severity of the flood problem. Furthermore, the increased numbers of local and international, high-value livestock will exacerbate operational complexity during evacuations, with extensive and probably repeated movements into and out of the development area being required to relocate all animals.

Closing Comments

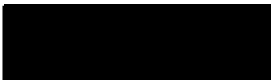
The proposal details development that is more compatible than residential development given the flood risk. I also note that the international Polo World Cup event in Australia is intended to be hosted on the Sydney Polo Club site in October 2017.

The NSW State Emergency Service agrees in principle that the proposed development would be a better use of the land than residential or tourist accommodation. However, as noted above, the proposal area is inundated in lower level and more frequent floods and does provide some challenges in

providing adequate warning, evacuation and increased operational complexity. We would welcome the opportunity to work further with Council and the proponents to find a way forward on the various identified issues.

If you require further information, please feel free to contact me via phone or email.

Yours Sincerely



Peter Cinque ESM OAM

Region Controller – Sydney Western Region
New South Wales State Emergency Service

12 September 2016

Philip Pleffer
Strategic Planning Co-ordinator
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WINDSOR NSW 2756

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Dear Mr Pleffer

**Re: Proposed amendment of Hawkesbury LEP 2012 for various properties,
Richmond Lowlands and Richmond**

I refer to your letter dated 20 July 2016 (your reference LEP006/15) consulting with the Hawkesbury-Nepean Flood Risk Management Taskforce (the Taskforce) under Section 56(2)(d) of the Environmental Planning and Assessment Act 1979 on the proposed amendment of Hawkesbury LEP 2012 for various properties, Richmond Lowlands and Richmond. Comment is provided on behalf of the Hawkesbury-Nepean Valley Flood Risk Management Directorate (the Directorate).

The Hawkesbury-Nepean Flood Risk Management Taskforce (the Taskforce) progressed the recommendations of the 2013 Hawkesbury-Nepean Valley Flood Management Review and has developed a Strategy for the reduction of flood risk in the Valley. This Strategy has been accepted by Government and its implementation will be coordinated by the Directorate.

The Taskforce overall findings have emphasised that any proposed increase in development in the Hawkesbury-Nepean Valley needs to be considered in a regional context to adequately assess cumulative and interdependent impacts on flood risk. This flood risk is concentrated in residential development, and it is noted that this rezoning does not permit any residential or accommodation development.

The proposed amendment to the Hawkesbury LEP 2012 are to facilitate the upgraded but existing use of the various properties for polo fields and recreation, including the 2017 Polo World Cup. Although the various properties are subject to a high flood risk and have to evacuate in relatively minor (1 in 5 year) flood events, the Directorate considers that recreational activity is an appropriate use of this land if an appropriate flood evacuation plan can be developed and endorsed by the State Emergency Service.

If you have any questions please do not hesitate to contact the Directorate at maree.abood@insw.com (phone: 02 8016 0167).

Yours sincerely



Maree Abood
Executive Director, Water Planning, Infrastructure NSW
Hawkesbury-Nepean Valley Flood Management Directorate

Cc

Peter Cinque
Regional Controller – Sydney Western Region
NSW State Emergency Service

Robyn Felsch

From: Sam Higgs <Sam.Higgs@environment.nsw.gov.au>
Sent: Wednesday, 2 November 2016 11:12 AM
To: Philip Pleffer
Cc: Andrew Kearns; Dana Alderson; Marnie Stewart
Subject: RE: Sydney Polo Club further information and meeting request

Dear Philip,

Further to your phone conversation this morning with Marnie Stewart and Dana Alderson, OEH have reviewed the Cumberland Ecology 'Response to OEH Submission' dated 5 October 2016 and note that the proponent does not wish to carry out additional flora and fauna assessment (FFA) at this stage of the planning process.

As discussed, OEH still recommends the preparation of a FFA at the rezoning stage to gauge possible impacts on the E2 zoned freshwater wetlands EEC and W1 Waterways riparian land.

Given the above, and the absence of any additional assessment, OEH does not see that a meeting with Council and the proponent is warranted at this stage.

If you require any further information please contact Marnie on marnie.stewart@environment.nsw.gov.au or Dana on dana.alderon@environment.nsw.gov.au.

Regards,

Sam Higgs
Acting Senior Team Leader Planning, Greater Sydney
Regional Operations Group
Office of Environment and Heritage
PO Box 644
Parramatta NSW 2124
T: 9995 6824

W: www.environment.nsw.gov.au

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7 February 2017

Roads and Maritime Reference: SYD16/0962/02 (A15952073)
Council Reference: LEP006/15

General Manager
Hawkesbury City Council
PO Box 146
Windsor NSW 2756

Attention: Philip Pleffer

Dear Sir/Madam,

**PLANNING PROPOSAL TO AMEND HAWKESBURY LOCAL ENVIRONMENTAL PLAN 2012 -
VARIOUS PROPERTIES AT RICHMOND LOWLANDS AND RICHMOND (SYDNEY POLO
CLUB)**

Reference is made to Council's email dated 16 November 2016, concerning the additional information submitted in support of the abovementioned planning proposal, which was referred to Roads and Maritime Services (Roads and Maritime) for comment in accordance with the consultation requirements under Section 56(2) of *Environmental Planning and Assessment Act 1979*. Roads and Maritime appreciates the opportunity to comment on the addendum traffic study, and apologises for the delay in providing a response.

It is noted that while a number of the issues raised in Roads and Maritime's previous submission letter (dated 12 September 2016) have been addressed in the supplementary traffic study dated 15 November 2016, some key issues remain unresolved.

While it is appreciated that a mitigation measure has been recommended at the intersection of Kurrajong Road and Old Kurrajong Road that goes some of the way to address traffic and safety impacts at the intersection, further detail/assessment is required in order to ensure the necessary works to mitigate all traffic and safety impacts at this intersection associated with the planning proposal will be delivered.

Detailed comments in relation to the supplementary traffic report and the planning proposal are provided at **Attachment A**, which should be addressed to the satisfaction of Council and Roads and Maritime prior to the gazettal of the proposed amendment to the LEP. Roads and Maritime would be willing to facilitate a meeting with Council to discuss these matters in more detail.

If you have any questions in relation to the above matters, please contact the nominated Land Use Planner Rachel Nicholson on phone 8849 2702 or development.sydney@rms.nsw.gov.au.

Yours sincerely,

Greg Flynn
Program Manager Strategic Land Use
Network Sydney

Roads and Maritime Services

Attachment A – Detailed Comments on Traffic and Access

1. As the planning proposal will introduce a range of additional permitted uses for the subject site (23 lots) under Schedule 1 of the LEP, collectively this will lead to an increase in development intensity and traffic generation potential of the site. In effect, this would allow the site to be used as a major outdoor private recreational facility with ancillary ongoing uses (ie function centres, light industrial/microbrewery, markets etc). Given this, the proponent/s should identify suitable infrastructure required to ameliorate the traffic and safety impacts associated with the future development.
2. Roads and Maritime notes that the addendum traffic study recommends a restriction to the right turn from Old Kurrajong Road (north) to Kurrajong Road; specifically, it is proposed to extend the duration of the existing right turn ban on this movement, from the existing hours of 3pm-7pm to proposed hours of 10am-7pm. As Old Kurrajong Road is a local road under the care and control of Council, ultimately this will require Council's approval.

Roads and Maritime would recommend that if a restriction to this approach is pursued to address the safety and efficiency issues associated with the increased delays on the approach, the approach should be restricted and signposted to 'Left turn only' to also address the safety and efficiency issues associated with through movements from Old Kurrajong Road (north) to Old Kurrajong Road (south)/Yarramundi Lane at this intersection.

Should Council endorse this treatment, Roads and Maritime would raise no objection to this mitigation measure to address safety issues associated with the increased traffic on this approach. However, prior to the gazettal of the planning proposal and implementation of the proposed treatment, a Traffic Management Plan should be prepared to consider the impacts of the redistributed trips (and any other improvements required) and should be submitted to Council's Local Traffic Committee for review and approval. Council should be satisfied that the appropriate community consultation is undertaken in order to consider potential impacts to affected land owners.

Should the above treatment not be endorsed by Council, an alternate treatment to address the increased traffic and delays on this approach would need to be identified and agreed prior to the gazettal of the LEP amendment.

3. In addition to the above matter, the addendum traffic study should also identify an appropriate intersection treatment to safely and efficiently facilitate the increased right turn movements into Old Kurrajong Road (north) from Kurrajong Road. In this regard, an appropriate treatment should be identified.

The treatment identified should be modelled to ensure appropriate geometric design (ie length of deceleration lane/storage) and operation of the treatment.

Roads and Maritime considers it is likely that the provision of a Channelised Right (CHR) turn treatment would be necessitated by the future development based on the traffic volumes indicated with reference to the warrants for turn treatments in the *Austroads Guide to Road Design, Part 4A Unsignalised and Signalised Intersections*.

4. Once the intersection treatment is identified and agreed, a strategic concept plan for the intersection treatment should be developed in consultation with Roads and Maritime. The treatment would need to be designed in accordance with Austroads standards and Roads and Maritime's supplements.
5. Council or the proponent/s should identify a suitable funding mechanism (eg Section 94 Plan or other planning agreement), prior to the gazettal of the amendment to the LEP (and

prior to the lodgement of any future development applications), to ensure that the works will be constructed to support the future development.

6. As mentioned in previous correspondence, special events such as the annual polo cup and the Polo World Cup will require special event Traffic Management Plans to be prepared to address operational matters, event traffic and access arrangements, and would need to be submitted to the Local Traffic Committee for approval in accordance with the *Guide to Traffic and Transport Management for Special Events*. This would be recommended condition of consent for any future development application for the works and structures to facilitate special functions and events on site, or for any special event DA.