

**Submission
No 235**

**INQUIRY INTO PLANNING SYSTEM AND THE IMPACTS
OF CLIMATE CHANGE ON THE ENVIRONMENT AND
COMMUNITIES**

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Date Received: 24 April 2024

Supplementary Submission for Development at Lot 50 Iona Close, Maclean NSW

- The proposed development forms part of a “corridor” of existing and proposed developments **in flood prone land and whose sewerage will be connected to the Central Avenue pump station.**
- Note also that since this DA was advertised there is now an active DA for duplexes at 1 Rannoch Avenue.
- The Central Avenue Pump Station is the main pump station for most of Maclean except for a significantly smaller area around Harwood Street.
- The Pump Station takes sewerage over to the treatment works in Woodford Island.
- The Pump Station is located on Central Avenue which borders Wherrett Park and where the 50 Iona Close development also borders along with the other developments and ... existing residences and businesses, including an aged care nursing home.
- There is a very high percentage of older age residents who live in the low lying land around Wherrett Park.

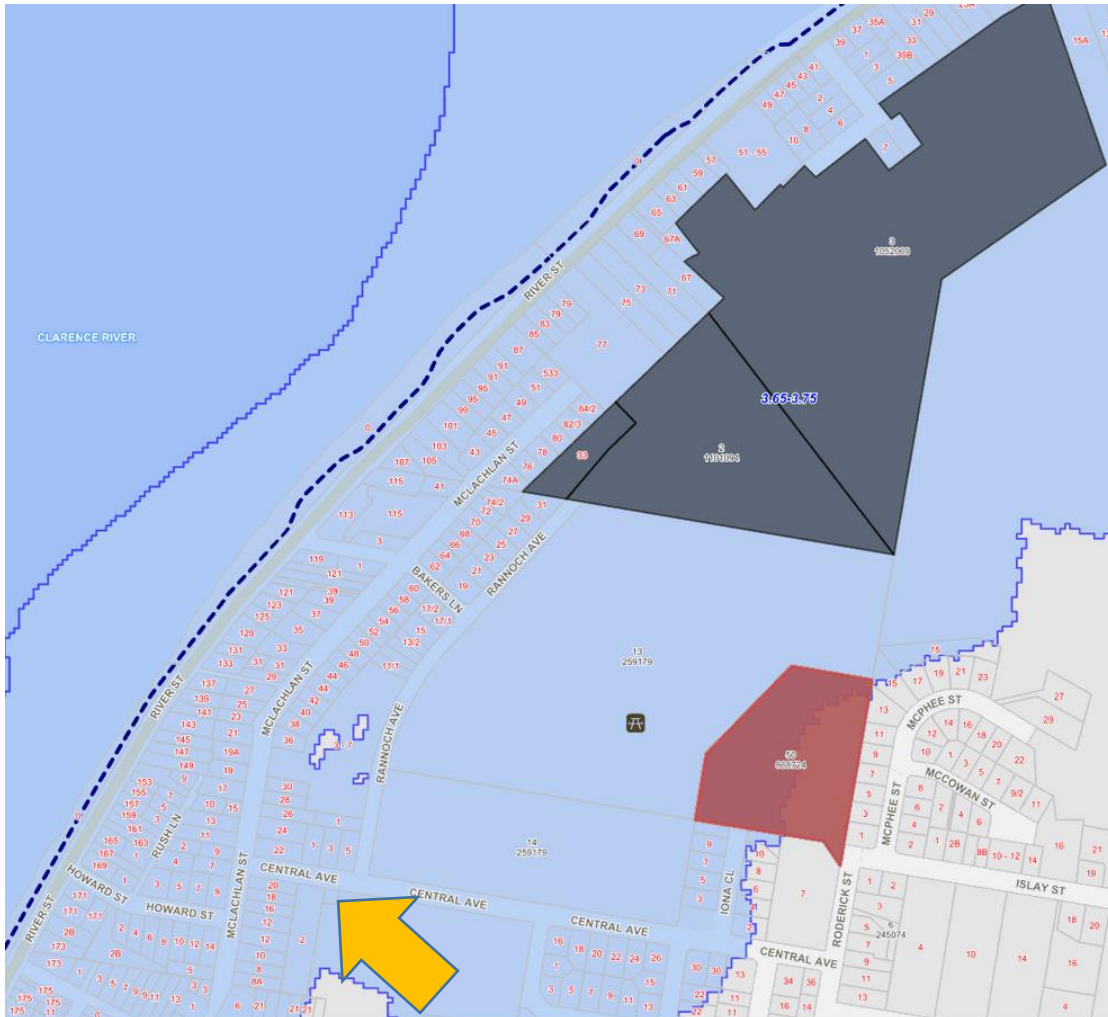
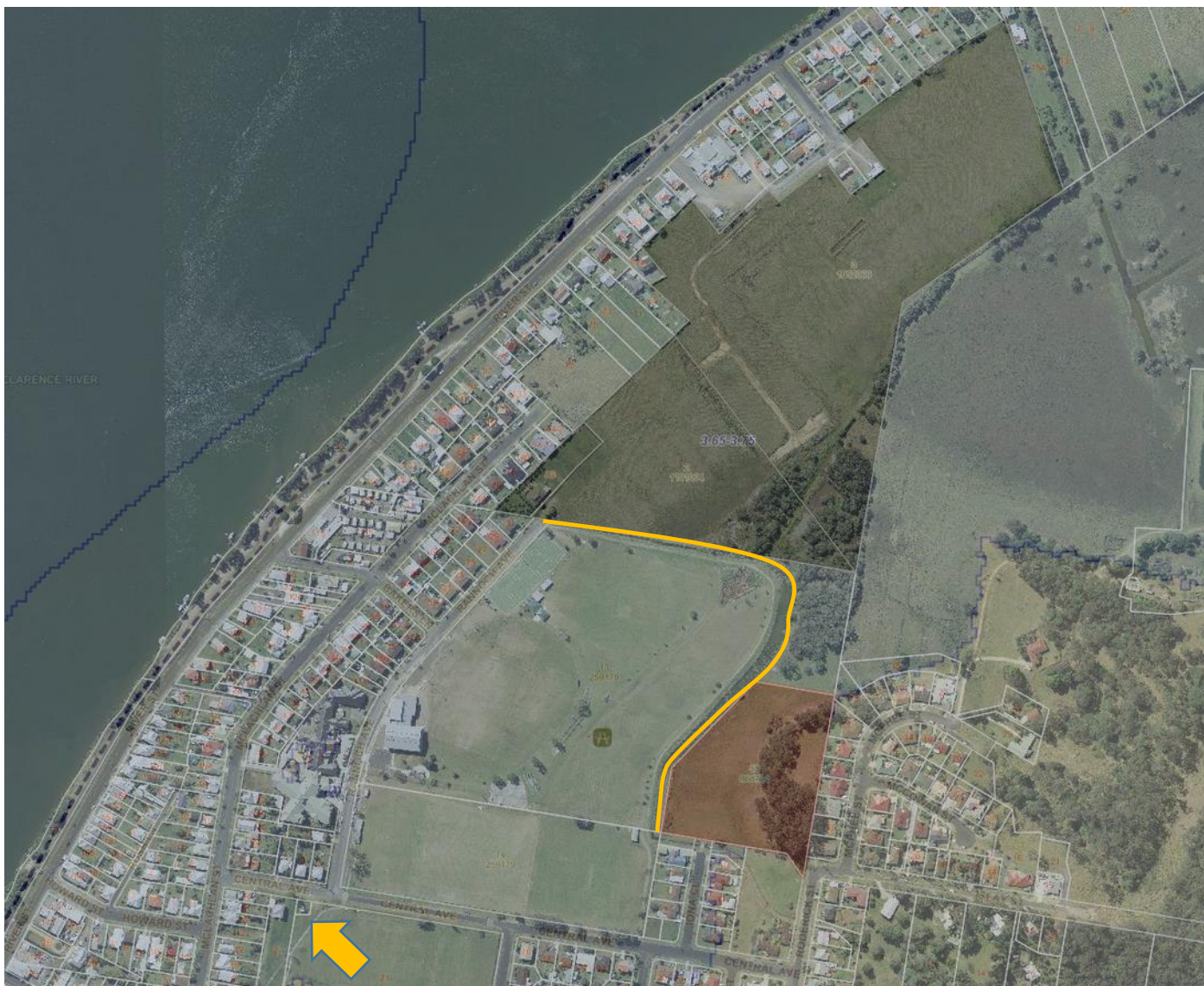


Image downloaded from Council Website. Blue shows flood prone land, the yellow arrow shows the Central Avenue Pump Station and the grey and maroon shaded areas – the “corridor” of development.

The maroon area is the Iona Close proposal requesting approval to fill land to 3 metres (plus?).

- Wherrett Park is “protected” by a levee wall.
- The image below (from Council website) shows the “corridor” of development and a yellow line which indicates roughly where the levee is located around Wherrett Park. Note also the location of the Central Avenue Pump Station (yellow arrow).
- The importance of the role of Wherrett Park is further acknowledged in the Council’s announcement of 21.10.22 that \$677,805 will be funded by a 2021 Community Local Infrastructure Recovery Program.



- During the February / March 2022 Event, the ponding in Wherrett Park remained for about 2 weeks despite the best efforts of Council to remedy the problem under extreme conditions. **I acknowledge these conditions and furthermore, I thank and applaud Council employees for their extraordinary efforts.** During the prolonged ponding time the town was exposed to a potential “brewing ground” of disease.
- The images on the next page, help to demonstrate what extreme events are capable of. Climate Change is now recognised as a problem creating regular extreme events.
- Since Wherrett Park was created, the Pacific Highway has had major earth works including huge amounts of fill to lift it above flood height.
- The Wherrett Park levee was overtopped in Feb/March 2022.

Image below shows as best as possible one place (next to Iona Close) where the Wherrett Park levee was overtopped.





This image was taken in Feb / Mar 2022 at the beginning of the flood event and before the river had reached the top of the Clarence River levee. It shows a significant amount of water in the Park. The pump did not cope with the stormwater from the previous day. Had it been able to then the events that followed possibly (probably) would not have occurred.

Note the sewer leakage from the manhole at the eastern end of Central Avenue.



This image shows the water in Wherrett Park at the height of the flood looking across Rannoch Avenue which adjoins Central Avenue.

The yellow arrow points to the western end of Central Avenue approximately where the Pump Station is located just a short distance past those trees.

The green arrow indicates the nursing home location.

This image does give some indication of the potential for waters to go into the town and in fact, did start to.



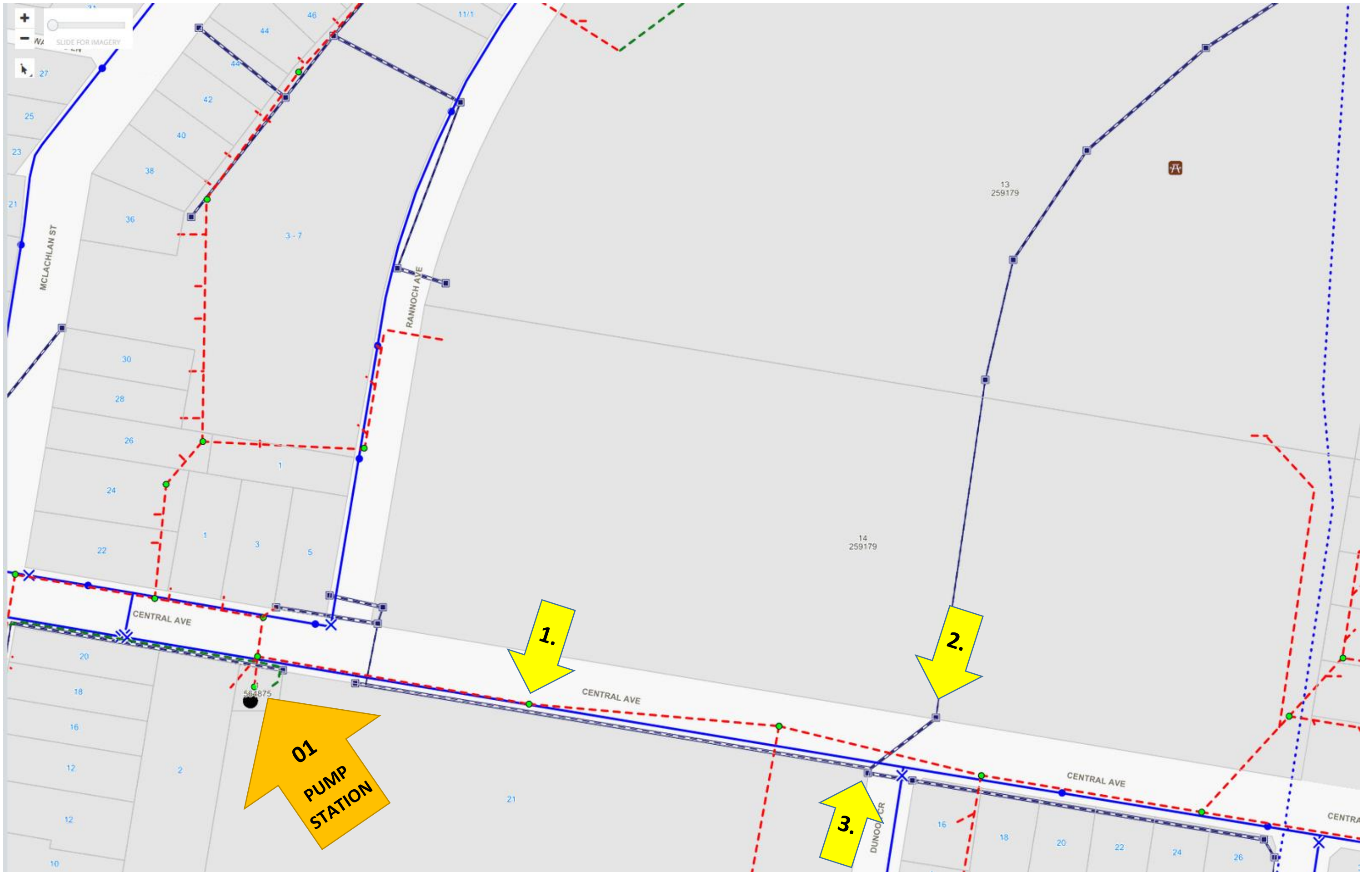
Image helps to highlight what was being experienced. Note the sewer leakage at the markers.

To summarise the current “corridor of development” that will impact on the Maclean sewerage, stormwater and flood mitigation:

- **River Glen** is under active development and appears to be large. Changes to Essex Drain located through their land were made in 2016 under historic Council approvals and, I believe are still able to continue under that approval. **This is flood prone land. Its sewerage will link into the Central Avenue pump station.**
- **50 Iona Close DA** – bordering on Wherrett Park and sharing Essex Drain - for 16 townhouses is currently in Council’s system for approval. It proposes 3 or more metres of fill and releasing storm water into Essex Drain. Stormwater release is expected to be increased due to loss of pervious ground for buildings and infrastructure. **This is flood prone land. Its sewerage will link into the Central Avenue pump station.**
- **Lot 1052069** – is next to the River Glen development – it is a large area which I understand is zoned Low Density. Part of their land borders or encompasses the Essex Drain. I am of the understanding that there could be some activity in developing this area as there are large concrete drain pipes being stored there at the moment. Whatever the case, the owners of this parcel of land would certainly be motivated to commence development given the progress of River Glen, Iona Close and Rannoch Avenue. **This is flood prone land. Its sewerage will link into the Central Avenue pump station.**
- **1 Rannoch Avenue - DA SUB2022/0045** - a smaller development but significant in its location to the abovementioned (and ownership if owned by the owners of River Glen). **This is flood prone land. Its sewerage will link into the Central Avenue pump station.**

Demonstration Event Illustrating Stormwater Without Riverine Flooding

- The following images demonstrate ponding and stormwater issues which occurred after heavy downpours during the night of 23.10.22 and early hours of 24.10.22. The numbers on the map have a corresponding image on the following page. I do not have photos of what occurred during the darkness.
- This is not an unusual scenario for any heavy downpours and are regularly worse than what is illustrated here, regardless of whether it is an extreme event or not.
- The ponding did not significantly reduce until about 7.00pm on 24.10.22.





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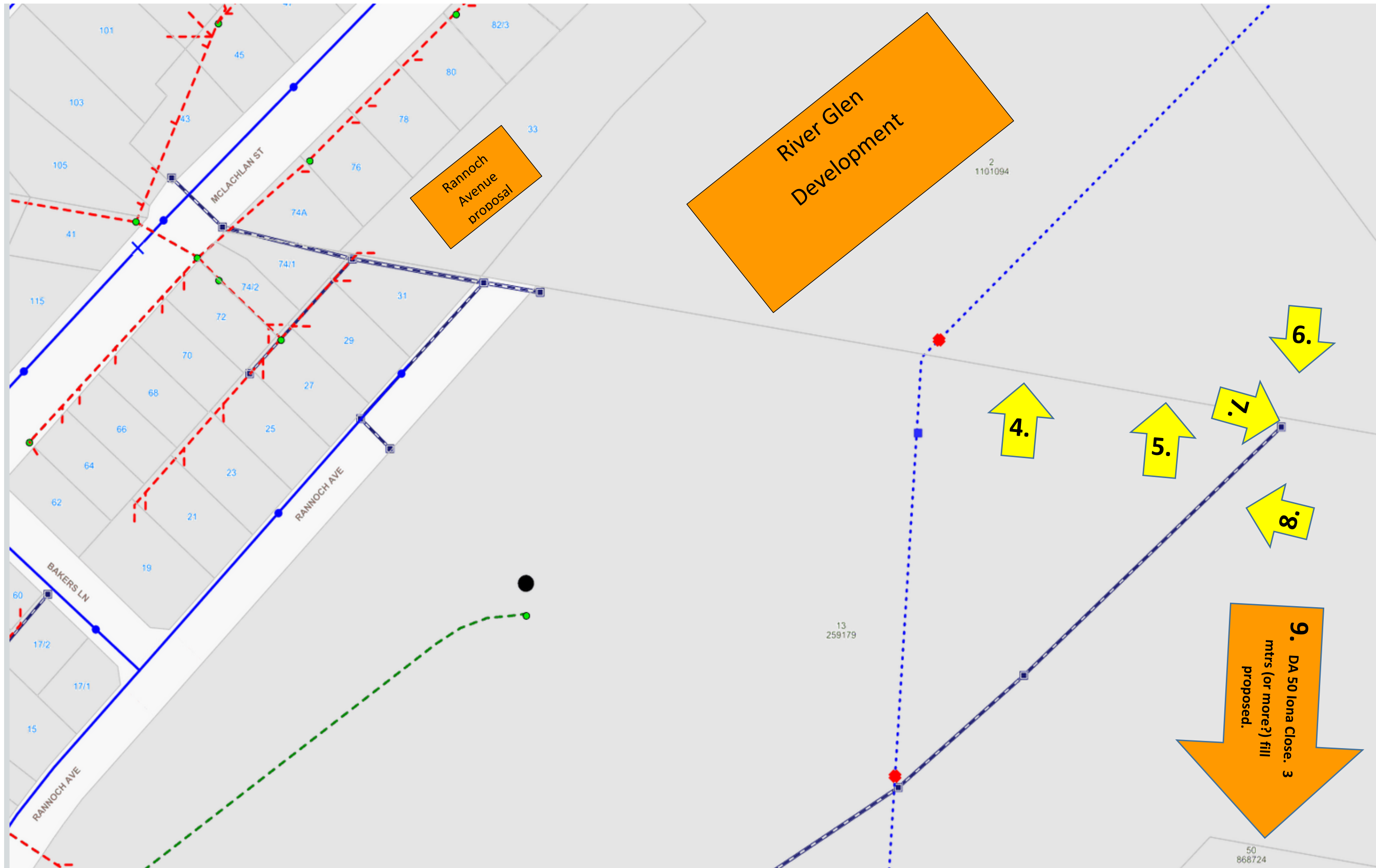
Manhole – NB exposed toilet paper. (This is not a new phenomenon.)



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6.



7.



8. NB This is Council's Conservation area located next to the DA area and its stormwater discharge point.



9.



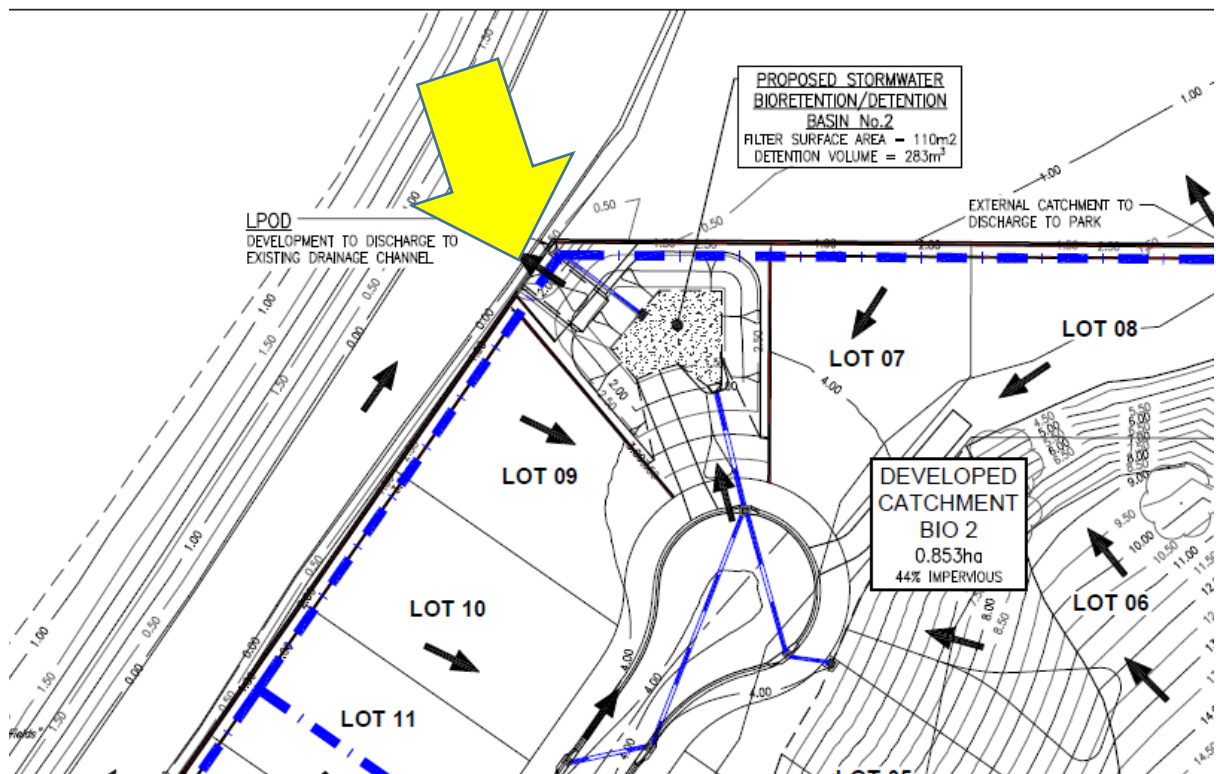
With respect, we object to the approval of this DA until the following questions are answered and considered:

- What will be done to increase the capacities for sewerage and stormwater and flood mitigation for existing properties of Maclean/Wherrett Park? Will the Developer pay for this?
- Will the developers contribute to an upgrade of the sewerage and stormwater systems including the pump stations?
- How will Council in any approval, address the increase in stormwater flow rates due to impervious areas and ensure that changes in levels will not negatively impact on existing residents?
- Given this DA's proximity to the "corridor" of development, what will be done to ensure flood mitigation for the town and Wherrett Park in particular are not compromised? Who will pay for this?
- Iona Close is part of a "corridor" of development in a flood prone area – has Council developed a masterplan or other plan that considers the collective areas and not just for each development?
- Is there a Flood Emergency Management Plan for this development?
- Has the Council considered the impacts on sewerage, stormwater and flood mitigation **given the collective "corridor"**?
- Will the Council hold a public meeting to discuss the impacts of this DA and the "corridor" of development specifically regarding sewerage, stormwater and flood mitigation?
- Has Council factored in Climate Change impacts and the Highway changes in their considerations?
- When are funds available for improvements to Wherrett Park ponding under the 2021 Community Local Infrastructure Recovery Program CLIRP?
- Are all funds available now or will it be subject to Government budgets and delays?
- Is this funding enough particularly given the development that is planned in this area?
- When will the improvements be made and what are they?
- Will this work be done prior to any building development but importantly, this DA?
- During construction, will the Developer be contributing to road repair costs?

- In April 2017, significant erosion occurred on the Wherrett Park Levee near Iona Close (we know because we reported it and photos were submitted to Council). It occurred at the end of the major drain next to Iona Close (see arrow below). It was repaired with a rock and steel revetment.



- We note that in the Westera report that the Point of Discharge for stormwater will be into the existing drainage “channel”. Please see image out of their report below.



- What will the Developer do to protect the levee wall and the adjoining Council Conservation area from erosion or any other damage including environmental caused directly or indirectly?

We would like to make clear that we are not “anti” development but we have a very pragmatic, common sense attitude backed up with actual experience.

We feel that we speak on behalf of all nearby residences and Maclean as a whole, that given our questions and input we have real issues that need to be fairly and honestly addressed.

The residents of Maclean should not be disadvantaged for the benefit of others. If there are real solutions that improve the situation for all, then let us know and put some real assurances and guarantees behind it.