

Gateway Review – “Allfarthing” 2 Brisbane Grove Road Planning Proposal PP-2024-295 – Gateway Determination

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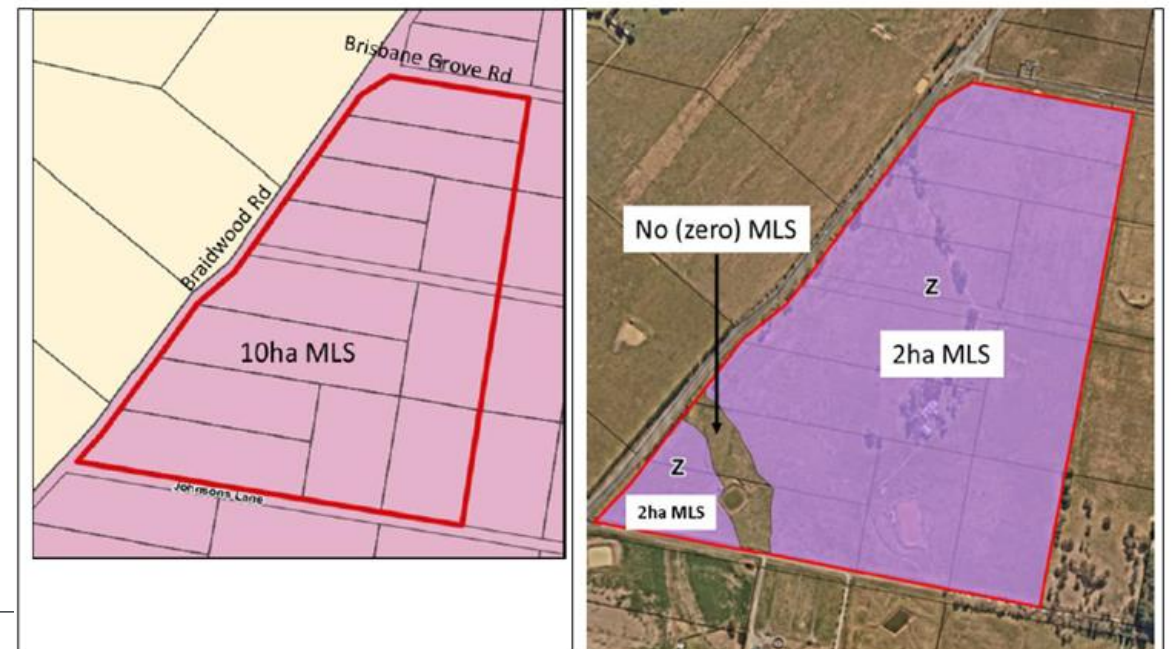
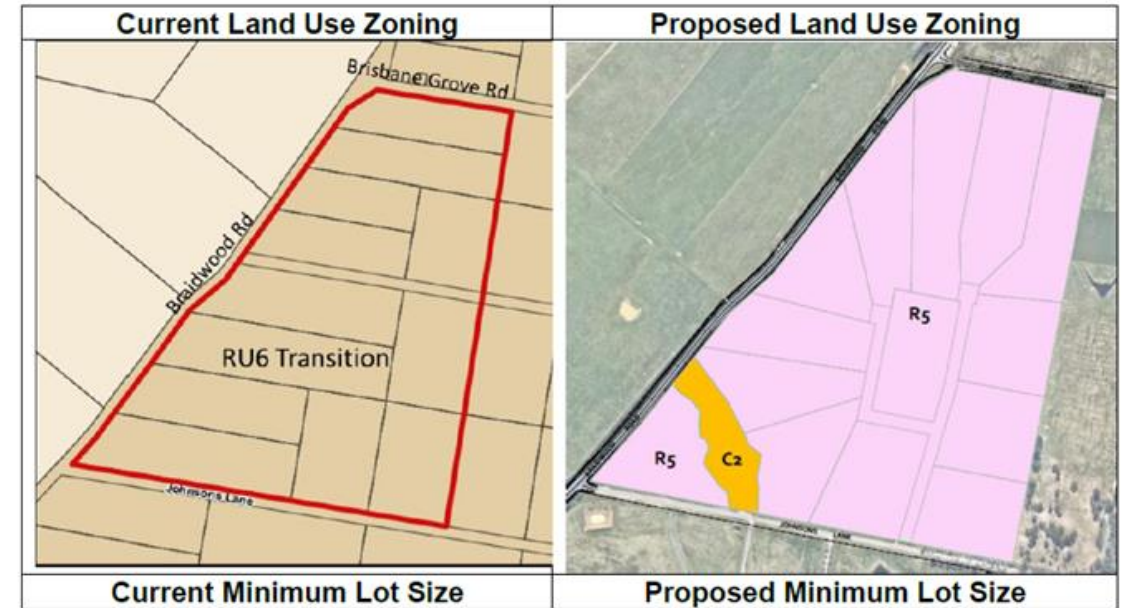
The Site

- 34.8 hectare rural site comprising 12 existing lots. 3-4 dwellings permissible
- Located south of the Hume Highway, 3km south of the Goulburn Urban Area and 800metres south of the Mulwaree River.
- Bounded on three sides by Braidwood Road, Johnson's Lane and Brisbane Grove Road.
- Locally listed heritage item ("Allfarthing") is located in the middle of the site (Lot 73 DP976708)



The Planning Proposal

- RU6 Transition Zone to R5 Large Lot Residential and C2 Environmental Conservation Zone under the Goulburn Mulwaree LEP 2009.
- 10ha minimum lot size to 2 ha minimum lot size and no (zero) minimum lot size for land zoned C2.
- Apply Clause 5.22 “Special Flood Consideration” Clause for land between the Flood Planning Area and the Probable Maximum Flood.
- 14 Potential dwellings



Background

History / Timeline

- November 2021 – Previous planning proposal PP-2021-6932 (16 dwellings) submitted to Council.
- October 2022 – Council referred the PP to DPHI seeking a gateway determination.
- November 2022 – DPHI issued a Gateway determination which required the PP be completed by November 2023.
- Council undertook pre-agency consultation with RFS, WaterNSW, HeritageNSW and DPE Biodiversity and Conservation Division (BCD).
- BCD objected to the proposal due to concerns about the adequacy of flood investigations and inconsistencies with the S.9.1 Direction 4.1 Flooding. BCD requested Council prepare a Flood Impact and Risk Assessment (FIRA).
- October 2023 - As the FIRA had yet to be completed, DPHI issued an Alteration of Gateway determination in October 2023 that the planning proposal not proceed.

- February 2024 - Council lodged a new Planning Proposal PP-2024-295 (14 dwellings), and the completed FIRA, on the Planning Portal seeking a gateway determination.
- February 2024 - DPHI sought comment from DCCEEW (Biodiversity, Conservation and Science) and the SES on the PP.
- Submissions provided by SES in April 2024 and DCCEEW (BCS) in June 2024.
- 10 July 2024 - DPHI met with Council, SES and DCCEEW.
- 25 July 2024 – DPHI meeting with Council.
- 21 November 2024 - Gateway determination (not to proceed) issued by DPHI.

Department of Climate Change, Energy, The Environment and Water

- Concerned the FIRA has not demonstrated that new residential sites can be evacuated prior to becoming isolated.
- Concern about the increased number of planning proposals in the area south of the Hume Highway at Goulburn. Need to consider the cumulative impacts associated with the increased occupation of land for residential use and issues linked to flood isolation.
- Concern, that although the FIRA indicates that new houses may be above the PMF, the flood isolation issue has not been addressed and is likely to result in an increase in government spending on emergency management services, flood mitigation and emergency response measures, particularly flood free road access.

State Emergency Service

- Concern that several lots are affected by the PMF and will be impacted by high hazard floodwaters.
- Concern the entirety of the site becomes frequently isolated from vehicular access/egress in at least the 10% AEP event. The development would expose the number of people and property exposed to the effects of flooding and other secondary emergencies.
- Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood waters are not supported and are not equivalent to evacuation.
- Opposes transfer to residual risk, in terms of management response activities, to the SES.

Gateway determination issues

Strategic merit:

- Inconsistent with current and draft South-East and Tablelands Regional Plans
- Inconsistent with Section 9.1 Directions 1.1 Implementation of Regional Plans (resilience/ suitable location for housing) and 4.1 Flooding (safe occupation and efficient evacuation and increase in government expenditure) and the inconsistencies have not been adequately justified.
- Is identified as an “Opportunity Site” in Council’s Local Housing Strategy which identified flooding as an issue to address. The Housing Strategy endorsed by DPHI in 2020 subject to detailed assessment including flooding of Opportunity Sites via the PP process.
- DPHI advised it was unlikely to support other similar proposals with long isolation periods, associated risks to future residents and emergency services workers and need for significant government investment on emergency management services and flood mitigation measures.
- DPHI recommended that Council consider reviewing the suitability of the Brisbane Grove Precinct for large lot residential development in Council’s Urban Fringe and Housing Strategy.

Site Specific Merit:

- The site is not a suitable location for housing due to concerns about flooding, safe occupation and efficient evacuation of the site.
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Flooding

- The site is not affected by the Flood Planning Area (1%AEP +0.8m freeboard)
- The northern corner is affected by the Probable Maximum Flood (PMF)
- All dwellings are proposed to be located outside of the PMF.



Evacuation

- However, only vehicle evacuation route is via Braidwood Road.
- Site access is lost during events rarer than a 5% Annual Exceedance Probability (AEP) flood.
- The road is expected to be inundated for 22.5hours during a 1% AEP event and 38hours during the PMF.

Image 5: Braidwood Road crossing of the Mulwaree River

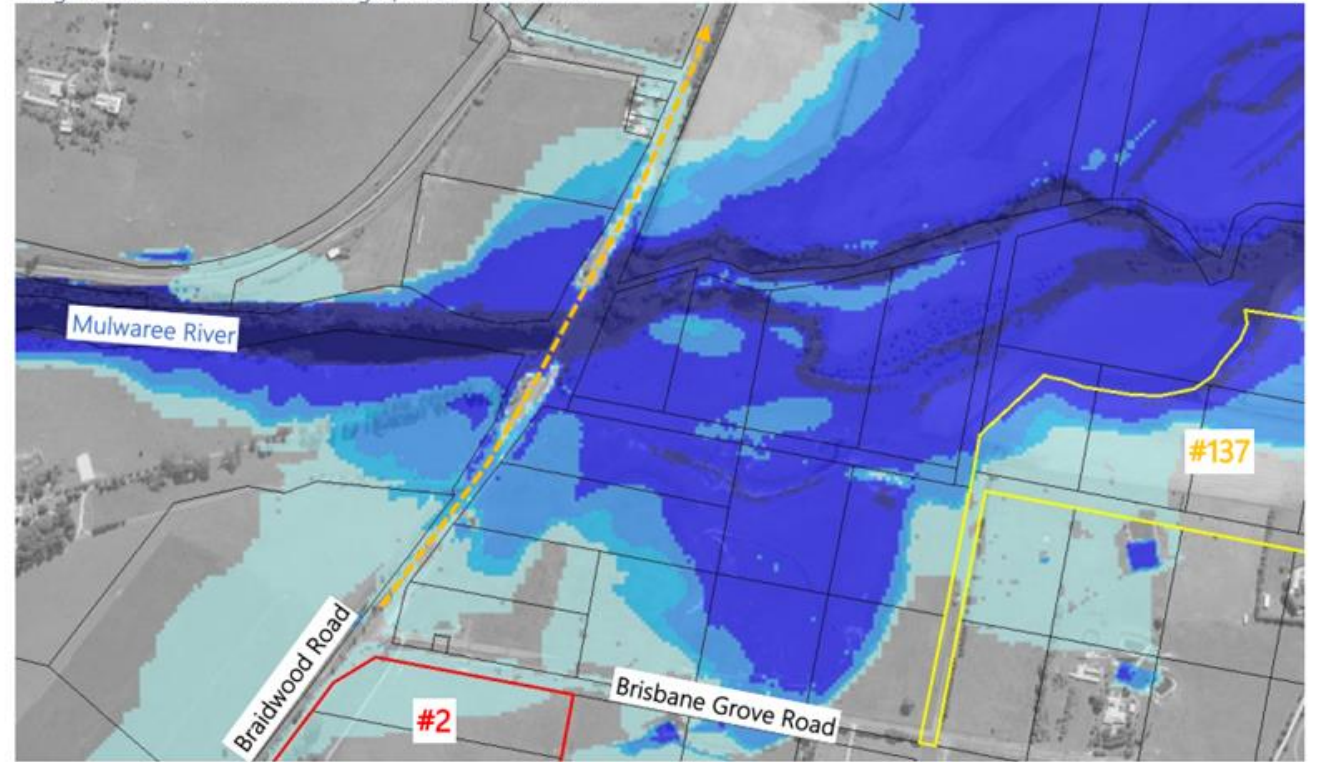


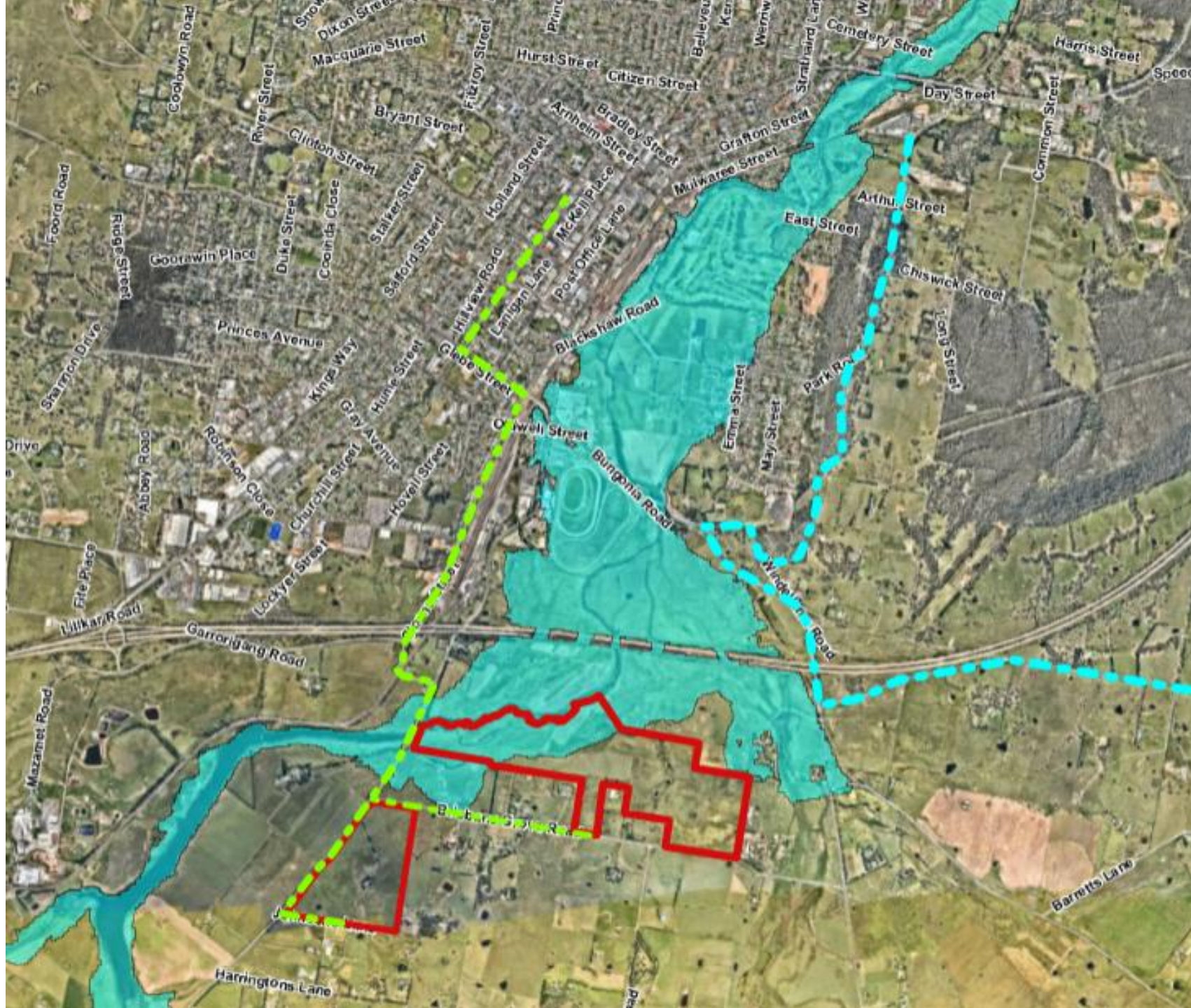
Table 5: Frequency, depth and duration of inundation of Braidwood Road

Events	Max Depth (m)	Duration of inundation	Duration with depth > 0.5 m
10%	-	-	-
5%	0.03	3.7	-
1%	0.57	22.5	8.5
0.5%	0.74	26.2	14.5
0.2%	0.98	30.2	20.5
PMF	8.62	38.4	35.7

Brisbane Grove PP Sites & Evacuation Routes



1% AEP



PMF

