



Natural Resources Access Regulator

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Dear Jon

23 January 2020

Iron Gates Residential Release – Evans Head - Draft Master Plan

Thank you for giving the Natural Resources Access Regulator (NRAR) and the Department of Planning, Industry and Environment – Water (DPIE-Water) the opportunity to comment on the Draft Master Plan for the Iron Gates Residential Release at Evans Head. NRAR and DPIE-Water have reviewed the plans and provides the following comments:

NRAR:

1. The Draft Master Plan for the Iron Gates Residential Release at Evans Head proposes a 10-metre setback from the mapped SEPP14 wetlands.
2. In accordance with the Guidelines for Riparian Corridors (NOW, 2012), wetlands are required to have a 40-metre Vegetated Riparian Zone setback.
3. The proposed Draft Master Plan for the Iron Gates Residential Release at Evans Head is not consistent with the Guidelines for Controlled Activities and NRAR recommends that the proposal be modified to include 40m setbacks.

DPIE-Water

1. The Iron Gates development proposal site lies at a pinch point on the Evans River. A slight elevation is aligned approximately along an existing road easement west of Lot 276 DP 755624. The subdivision is located on the eastern flank of this elevation, extending into a SEPP 14 coastal wetland.
2. A flood study developed for the Evans River indicates likely inundation of the Iron Gates Road and potential floodwater storage within the development area. The development is likely to be isolated during floods, and climate change risks of increased flooding severity may pose some threat to part of the development area.
3. The Master Plan does not provide sufficient information for assessment of geomorphic risks arising from existing flood regimes or potential changes as climate change scenarios occur.

4. Geomorphic processes driving sediment transport and deposition are significant in a wave dominated delta estuary. Sediment accumulation may drive increased flood height or storm surge backwater storage in the SEPP 14 wetland and associated watercourses and drainage lines.
5. Geomorphic processes are not addressed in the documentation provided. Detailed assessment of estuarine geomorphic processes is required to account for likely and possible changes in flood flow behaviour resulting from climate change, leading to altered sediment transport and deposition processes in the Evans River estuary. This should form a basis for mitigation to flooding risk to the Iron Gates subdivision proposal and identify appropriate development limits to housing on the site.
6. Hydrologic linkages between the Richmond River estuary and the Evans River inlet through the Tuckmobile Canal below Woodburn require further detailed examination.
7. The risk of inundation and isolation of the Iron Gates proposal resulting from storm surge meeting flood wave travelling along the Evans River requires detailed explanation. The flood scenarios rely upon the WBM Evans River Flood Study, therefore the inundation and fringing flood zones adjacent to the development site should be assessed against the recommended flood protection elevation buffers for the lower Evans River.
8. Sedimentation storage and influence on flood surges into and along the lower Evans River should also be included in any such study. This must also address intrusion into the existing SEPP 14 wetland and development adjacent to an unnamed drainage line within Lot 544 DP 48550.

Should you have any further queries in relation to this submission please do not hesitate to contact NRAR at nrar.servicedesk@industry.nsw.gov.au.

Yours sincerely



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