

Attachment 1 to Item 10.3.3.

Table Matters raised in submissions and Council Officer responses to the submissions

Date of meeting: 11 March 2025 Location: Council Chambers Time: 6:30pm

Submission No.		Matters Raised in Submission	Officer Comment
		See attached submission	
		Road Improvements - road raising, drainage	This submission provides a number of suggestions (numbered A t
			 A. Wolseley Road, McGraths Hill – road raising B. Pitt Town Dural Road, Pitt Town – road raising, road wide C. Railway Road South, Windsor – road widening and drain D. Colith Avenue- Sirius Road – designate as evacuation ro E. Colith Avenue, south Windsor – road raising F. Colonial Drive, Bligh Park – left turn ramp G. George Street, South Windsor – drainage improvements H. Thorley Street, Bligh Park – reconfigure/widen I. Thorley Street, Bligh Park – emergency left turn bypass
			Following a review of these suggestions by the consultant, it is required merit and that further investigations be included within the Floodpl
			Suggestion A is cost prohibitive, whilst suggestion F would not pro I, involving improvements to evacuation routes or state roads are evacuation routes are currently being considered by Transport for
		Currency Creek diversion support Regional flood mitigation - Warragamba Dam advocacy	
1	Comment	Regional evacuation traffic flow	Regional evacuation routes and traffic flow on these is the response
		Legacy development	Planning and development controls are based on the frequency and appropriate controls/ restrictions based on circumstances of indivi- lawful development.
			The draft Study and Plan recommends the review of, and changes the Flood Planning Level, the use of Flood Planning Constraint Ar development controls. However, should Council adopt the Hawke 2025 including these recommendations, planning controls will not there is a process to develop, publicly exhibit and adopt flood rela recommendations into effect.
		Buyback or Land swap & House raising	The draft Study and Plan recommends further investigations in rel purchase.
		Future risk - supports new 0.5% FPL, but not freeboard for areas which are not flood islands	A freeboard is applied to the flood planning level as a factor flood level. The freeboard compensates for uncertainties in action, localised hydraulic behaviours and impacts that are embankment settlement, and other effects such as climate
			The typical freeboard for residential development due to flo creeks, is 0.5m, and the draft Study and Plan recommends freeboard should apply to the whole of the floodplain as it a flood levels throughout.
2	Comment	Identify and be able to call upon a Drone vendor to complete deliveries of food and medicine to stranded people during high flood events.	The supply of food and medicine to isolated communities/people i Services.
3	Supports	I live in Windsor and would love my house to be raised out of the flood zone	Supports the house raising option recommended in the draft Study

A to I) in relation to road improvements:

widening and realignment rainage improvements n route

nts

recommended that Suggestions B, C, D & E have dplain Risk Management Plan as a future action.

provide the expected benefits. Suggestions G, H and re outside the scope of this Project. Improvements to for NSW's Road Resilience program.

onsibility of State Emergency Services.

y and consequences of flooding, thereby ensuring lividual properties, including allowances for existing

ges to, Council's planning framework, including raising Areas and the development of appropriate vkesbury Floodplain Risk Management Study and Plan not change immediately in a statutory sense. Rather, elated development controls to bring these

relation to house raising and voluntary house

tor of safety expressed as the height above the s in the estimation of flood level, such as wave re specific event related, such as levee and te change.

flooding from waterways, such as rivers or ds the adoption of a 0.5m freeboard. The t addresses the uncertainties in the estimation of

le is the responsibility of NSW State Emergency

udy and Plan.

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		The planning needs to be done accurately. Most parts of South Windsor don't even go close to flooding, the whole suburb shouldn't be lumped in with the lower lying parts. Existing residents shouldn't be punished with more insurance and property value decline when it doesn't flood in their area. Future development applications should also not be affected in these areas.	Recent floods were approximately a 5% AEP event or less and the Windsor. Whether or not a property was flooded in recent events liable/located on a floodplain.
			Much of the township of South Windsor is located above the 1% A Flood and therefore considered to be flood prone.
4	Comment		Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of indivi
			This Project is a floodplain risk management study and plan using management options identified in the proposed Plan will not change influence on property insurance or value.
			The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
		The levees are a crucial part of floodplain management and need to be maintained and replaced immediately if damaged.	The draft Study and Plan does not support the implementation of maintenance, repair, replacement, and overall management of oth
5	Object	The 1:200 flood level planning guide is too general. We need to support existing residents in dealing with their existing flood risk. The effect of this proposal will be to kill off the community and local business.	Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of indivi lawful development.
6	Object	With the raising of the maximum flood height, it will affect the value of properties insurance will go up and also banks will be less likely to lend money as it is more of a risk. I do not agree with this and should not go ahead. This will kill the Hawkesbury and will affect first home buyers who have	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan will not change influence on property insurance or value.
		bought into the Hawkesbury making their properties worth less than they paid for it. This must not go ahead.	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
7	Object	This will ruin people financially. Please stop building on floodplains.	Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of indivi
8		Thank you for this opportunity. Simplified, my submission is around a review of flood management by various new suburban developments and the impact they have on local creeks such as Marsden Park on South Creek and Rickaby's creek as well as Redbank on the Nepean.	Local Creek flooding is outside the scope of this draft Floodplain F The Currency Creek Bypass option creates a diversion with simila however as demonstrated in the draft Study, this option does not l
0	Comment	A second submission is based on reviewing the straightening of the Hawkesbury River by the use of canals. Bends near Windsor, Cattai, Ebenezer and Cattai regions in particular. These issues with restricted water flow have been managed in the past by many European countries with great success. Thank you.	nowever as demonstrated in the draft Study, this option does not
9	Comment	The Council used to have an advisory community Flood Committee, which included experts in flood management. The Council abolished it some years ago. The effect of this has been that Council and its staff no longer have the advantage of expert community advice and perspectives in this crucial and challenging issue for the district. If the Council is serious about seeking feedback, it needs to put in place authentic community structures and systems that give the community an ongoing voice, in addition to these one-off opportunities to "have your say".	This Project has been overseen by Council's Floodplain Managen in accordance with the NSW Government's Floodplain Risk Mana community representatives.
		I am completely opposed to this decision as my partner and I have worked hard to own our own home. I agree that this plan should be made for new developments only but not existing homes. My insurance premium would go through the roof while our house price would plummet if I was ever to soll. Not happy!!!	Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of indivi lawful development.
10	Object	ever to sell. Not happy!!!	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan will not change influence on property insurance or value.
			The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.

therefore would not have impacted most of South the is not an indication that a property is not flood

AEP, however, is also below the Probable Maximum

y and consequences of flooding, thereby ensuring lividual properties.

ing existing flood data/information. Therefore, the ange existing flood risk and therefore will have no

in the area in which development controls can be

of levees, however it does recommend the other existing flood mitigating infrastructure.

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n Risk Management Study and Plan.

nilar outcomes to those suggestions in this submission, ot have an acceptable cost benefit ratio.

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Submission No.		Matters Raised in Submission	Officer Comment
11	Object	Making this change will drastically affect the current residents of the Hawkesbury and surrounding areas. Doing this will increase our insurance costs and make most properties surrounding the river in the Hawkesbury uninsurable. Doing this, will decrease value on residents' properties substantially, potential buyers may not be able to insure Making the properties harder to sell. Current landowners may not be able to develop or change their land - which under the normal conditions would be possible. I would strongly suggest to keep the current measurements as they are. Not to make any changes that will affect the livelihood, incomes and potential future value of our land and property. I am strongly against this as our family have been residents of the Hawkesbury for the past 39 years. We cannot afford for our property to be subject to change in value or flood risk because of councils' decision to change the plan.	This Project is a floodplain risk management study and plan using eximanagement options identified in the proposed Plan will not change eximfluence on property insurance or value. The raising of the Flood Planning Level will result in an increase in the applied to increase the resilience of development to flooding.
12	Object	You cannot raise the level. That high! Our properties will become worthless. Please look at lowering the level of the dam and keeping it there and use the expensive desalination plant as backup for water.	This Project is a floodplain risk management study and plan using exi management options identified in the proposed Plan, including raising existing flood risk and therefore will have no influence on property ins The raising of the Flood Planning Level will result in an increase in the applied to increase the resilience of development to flooding. Raising the Warragamba Dam wall or lowering the water level in the role in this respect is in advocacy.
13	Object	If council were to dredge the river (it hasn't been done in about 20 years because of the greenies). Flood mitigate the dam. Not put up the building requirement of 19.5 meters and leave at 17.5. The dredging and flood migration would alleviate major flooding in the Hawkesbury basin. Council needs to use commonsense and work for the people of the Hawkesbury.	Dredging of rivers have legislative implications and approvals, as well Raising the Warragamba Dam wall or lowering the water level in the or role in this respect is in advocacy.
14	Support	Yes	Noted.
15	Object	I oppose the proposed change in the flood level for the Hawkesbury. This change would mean I would not be able to insure my home, and the value of my property would severely decrease.	This Project is a floodplain risk management study and plan using exi management options identified in the proposed Plan, including the rai change existing flood risk and therefore will have no influence on prop The raising of the Flood Planning Level will result in an increase in the applied to increase the resilience of development to flooding.
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18	Object	I disagree with the updates to the 2025 flood planning document of raising the flood planning at Windsor to 19.3 meters. This will do more harm than good for residents as a flood can still be mitigated at this level if the unlikely event it was to occur. However, it will make it even harder to get flood insurance, affect the property values and make it difficult for banks to lend to owners in this new zone. It is just like the PFAS issue which has the potential to have a negative impact on house prices in the Hawkesbury. There are articles in the works highlighting how the PFAS issue was swept under the rug and homeowners in the Hawkesbury were kept in the dark when purchasing their property that these manmade substances were in our local drinking water which was coming from the river. Now this has come to light and will continue to, it's another thing against Hawkesbury homeowners.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
19	Object	Council had always controlled Development's and should compensate property owners for extremely poor planning. Class action to sue council will be likely unless they raise Dam wall. Hawkesbury council needs to protect Hawkesbury residents they have failed, by mitigating the flood issues or buying out residents at market prices.	Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of individent lawful development. The draft Study and Plan recommends Voluntary Purchase for home
			a mitigation option. Raising the Warragamba Dam wall or lowering the water level in trole in this respect is in advocacy.
20	Comment	 Hawkesbury Councillors made decisions that affect where developers can build since the start of councils control of McGrath's Hill. Their poor decisions are now being reviewed by this flood report and council has to protect residents they have failed by buying out properties affected by flood levels due to higher insurance premiums and how banks view borrowings on new "prone land" according to this report. Putting funds into increasing the dam wall would be much cheaper than buying out residents or council being sued due to liability and poor planning. 	Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of individent and the standard development. Flood related development controls have been applied throughout that time. Raising the Warragamba Dam wall or lowering the water level in the role in this respect is in advocacy.
21	Object	I write to oppose the planned changes to the flood levels. I believe the current classifications met residential safety requirements. Any lifting of the flood levels will have adverse implications for local residents and businesses.	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of indivi- lawful development.
22	Comment	Please make it very clear that the proposed bypass at Pitt Town is not included in the same breath at flood evacuation. That Hortons Bridge area goes many metres underwater.	The draft Study provides the following in respect to the Pitt Town The Pitt Town Bypass aims to reduce traffic through the town cen flood resilience for local residents. The Pitt Town Bypass is currer an overflow path from Pitt Town lagoon to Long Neck Lagoon tha area should be carefully designed to result in minimal impact in th Pitt Town levee modelling discussed in Section 8.3 does not cons included in the 2024 Hawkesbury-Nepean Flood Study.
23	Object	Against this idea - would cause further economic heartache for so many businesses and households. Insurance is already through the roof in Pitt Town even in areas that don't flood.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan will not chan influence on property insurance or value.
24	Object	I do not agree with this proposal.	Noted.
25	Object	This is unnecessary and unfair	Noted.
26	Object	Leave it as is please.	Noted.

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and consequences of flooding, thereby ensuring ividual properties, including allowances for existing
nouses located in extreme flood hazard/risk areas as
n the dam is a State Government matter. Council's
and consequences of flooding, thereby ensuring
ividual properties, including allowances for existing
out time based on the flood information available at
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and consequences of flooding, thereby ensuring ividual properties, including allowances for existing
n Bypass:
entre, improve safety for road users and enhance ently planning for construction. The Bypass crosses at activates in 5% AEP events. Crossings in this the regional flood events not just local events. The nsider the Pitt Town bypass, which is also not
ng existing flood data/information. Therefore, the inge existing flood risk and therefore will have no

Submission No.		Matters Raised in Submission	Officer Comment
27	Comment	 Having lived and resurrected my home through multiple floods it is concerning to see no real plan is in place to cover issues such as: Dam levels. Rivers silting up Diversion of rising water Insurance policies being different things for different areas Road repairs and mitigation. With no action being taken the ongoing cost to the wider community to restore life and property is unbelievably high and should be dealt with so this cost is minimised as far as possible. Why we don't keep the Warragamba dam at 90% especially with weather warning systems more accurate is beyond anyone. We need to stop getting hung up on words like "Flood mitigation" or water restrictions because the best way to stop billion in \$\$ being spent on clean-up is keeping the level at 90%. That way the Hawkesbury has a chance to escape to the coast and not create the bathtub effect along the estuaries. Will it fix the heavy rains? We don't know but it used to when dam was below 90% (check your records) Next point is to keep dredging the river system and use the valuable silt for builders and get income for this and at same time keep rivers flowing properly. Please don't respond by saying environmental concerns as the rivers were deeper in the early 2000 and now they are not so they should be taken back to what they were. Remember when barges went all the way to St Albans?? No chance now. Lastly create a diversion river further down the Hawkesbury which allows rainfall to be swept into massive drainage pipes before Wisemans Ferry and re-emerges further down so the town and surrounds are spared. This would save enormous costs. It's all rural land so easily approved. The insurance issue is a real worry so the councils and NSW government need to establish a flood pol for insurance that residents can put into each month and builds up to a level that can help with insurance cover. Right now homeowners can't afford flood insurance and no one can get finance for	Raising the Warragamba Dam wall or lowering the water level in the role in this respect is in advocacy. Dredging of rivers have legislative implications and approvals, as the Currency Creek Bypass option creates a diversion similar to the draft Study, this option does not have an acceptable cost benefit respective investigations into the use of tunnels is not within the scope of this investigations into the use of tunnels is not within the scope of the second
28	Comment	Stop progressing and building upon a well-known floodplain! History has not changed, nor will it and your need to keep building upon a lot of old swamp lands is only making it worse! You are responsible for putting our homes and lives at risk!	Noted.
29	Object	Undoubtedly flooding is an ongoing issue in the Hawkesbury. I do not agree with that the current plan should be adopted. I believe a less severe flood target should be adopted. Property values will plummet, and insurance will sky rocket or be unobtainable for a much larger community than is necessary. Scale it back please!	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on provide the raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individually lawful development.
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y and consequences of flooding, thereby ensuring dividual properties, including allowances for existing

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30	Comment	Hi there, I tried to make a submission on the 'your feedback will make a difference have your say' site but it would not send me the 4-digit code I needed to register to make a comment. Typical. I have been severely impacted by 3 major floods that ruined my business in Windsor each time. Despite being only 2 km from the RAAF base no help was offered from our defence force. The only help I got throughout each flood was from a few volunteers bagging sand in the local park. We had to go get the bags ourselves. Otherwise, the Red Cross and Rotary both laundered donations back into their vast coffers and no-one saw any money from those groups. The Recovery centre was a complete waste of everyone's time and efforts. Mostly a lot of board government bureaucrats (many flown in and accommodated at the government's expense) sitting around behind computers twiddling their fingers. The government compensation grants (mostly only loans for farmers) and compensation were the most difficult and humiliating scheme anyone could get through. I had to resubmit information many times, was interrogated for my personal details and evidence and found that the experience of dealing with them was worse than the actual flood. I know many people that gave up on this process and fled the area. Volunteers from the fire brigades helped a bit moving out ruined furniture. Council was useless; they left flood rubbish pile (council said sory they forgot) but they did offer mental health service directions and aerobic classes for us at the local hub - like we need that! They still expected the rates to be paid on time of cause. There was no investigation as to the cause of the major parties. They decided to pour our money into better roads so we can escape better. Ha. Politicians flew over in helicopters and visited volunteer hubs with their new crews trying to look sad. So useless.	Noted.
31	Comment	The solution to the flooding in the Hawkesbury is to change the legislation so Warragamba Dam can be mitigated BEFORE these very well forecast rain systems arrive. After all we do have desalination plants that supply water as well.	Noted. Raising the Warragamba Dam wall or lowering the water level in role in this respect is in advocacy.
32	Object	I disagree with the 2025 flood risk management study and proposed mitigations. Further expenditure for flood management is simply justification for council to continue to approve development in a known flood plain. As a resident of the Hawkesbury for over 50 years, more than the majority of bureaucrats using theoretical models to predict floods, it is an insult. What a waste of rate / taxpayer's money. It is an appeasement to those who relied on council to provide them with accurate information. Blaming Warragamba Dam for the large floods is simply a demonstration of the lack of accountability for councils planning decisions. Levees are insanity and denial of the root cause. Implementing the proposed strategy and reclassifying areas after people have invested, will devalue properties. No consideration has been given to the resulting costs of insurance for all properties in the same postcode which will never be impacted by flood e.g. 2756 which is a significant area. There should be a class action against council - lobbyists are already commencing this motion. The days of council accountability are getting closer.	Noted. The study doesn't support levees with the reasons why discussed Warragamba dam is not blamed for floods, and the raising of the the Warragamba Dam wall or lowering the water level in the dam respect is in advocacy.
33	Comment	Penrith Lake could be a secondary dam with a levee around it. Raising the Warragamba Dam would also create more water reserves for the dry years ahead. It should also be managed as a flood mitigation dam.	Noted. Raising the Warragamba Dam wall or lowering the water level in role in this respect is in advocacy.

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sed in the draft Study.

the dam wall is supported by the Draft Study. Raising am is a State Government matter. Council's role in this

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34	Object	A review of the mapping would highlight that the impact to the Hawkesbury residents is massive with loss of value of these properties and residents may find it impossible to sell or even be able to insure. The basis of the mapping I believe is incorrect as some areas shown have never flooded or been impacted by flooding. I would question the value of these statistics and their accuracy for future planning.	Flood frequency analysis has been undertaken in the Hawkesbury Reconstruction Authority) using very long historic records, and the historical flood events giving confidence to the calculation of define Recent floods were approximately a 5% AEP event or less and the Windsor. Whether or not a property was flooded in recent events, property is not flood liable/located on a floodplain. Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individ lawful development.
35	Comment	See Submission Learning from other Councils - Elevating homes and driveways; flood resilient design Promoting Resilience and Adaptability - flood resilient design and materials for new builds and retrofits; incentives for retrofits Strategic Rezoning and Buy-Back Schemes Comprehensive Community Support Programs - clear, accessible information; financial assistance Concerns with Proposed Flood Level Adjustments	The draft Study and Plan recommends flood proofing of buildings, development where feasible. Council's existing and future flood re- for the use of flood resilient design and material. The use of Flood Planning Constraint Categories (or similar) ident identification of appropriate planning controls relating to land use to The draft Study and Plan uses existing flood level data from the H Reconstruction Authority). The draft Study and Plan proposes to of the imposition of flood related development controls on more prop development into the future. The management options identified in the proposed Plan will not of influence on property insurance or value.
36	Comment	See Submission Resilience – Transport for NSW to fast-track Richmond Bridge Project and to raise bridges along Springwood Road to 1% AEP level in time with the opening of the Grose River Bridge. Essential Services Protection - Electrical Substations, sewer and water infrastructure to 1% AEP level Planning Certificates and Insurance - Flood Planning Level rise - impact on existing development, impact on insurance. Flood Planning Level and Exempt and Complying Development - effect on complying development approvals Resilient Lands Strategy - Revised Housing Strategy	The timeframe of Transport for NSW projects is subject to State G advocacy. Whilst the location of essential services above the 1% AEP flood le practical when providing services on existing floodplains. Busines responsibility of the providers. Council's role is one of advocacy. The draft Study and Plan uses existing flood level data from the H Reconstruction Authority). The draft Study and Plan proposes to o the imposition of flood related development controls on more prop development into the future. The management options identified in the proposed Plan will not o influence on property insurance or value. The raising of the Flood Planning Level will result in additional pro purposes of undertaking Complying Development. If these proper lots', complying development will not be able to be undertaken, an through the development application pathway. In this case, develop appropriate and is carried out in such a manner that minimises and

ury-Nepean River Flood Study (prepared by NSW the modelling has been calibrated to these numerous fined flood events.

therefore would not have impacted most of South its, or even past events, is not an indication that a

/ and consequences of flooding, thereby ensuring lividual properties, including allowances for existing

gs, which can include the retrofitting of existing d related development controls include requirements

entifies different areas within the floodplain for the se type and building construction.

e Hawkesbury-Nepean River Flood Study 2024 (NSW to change the Flood Planning Level, which will enable roperties thereby improving the resilience of more

t change existing flood risk and therefore will have no

Government priorities. Council's role is only one of

d level or higher is desirable, this is not always ness continuity planning for essential services is the y.

e Hawkesbury-Nepean River Flood Study 2024 (NSW to change the Flood Planning Level, which will enable operties thereby improving the resilience of more

t change existing flood risk and therefore will have no

properties being identified as 'flood control lots' for the perties cannot meet the requirements for 'flood control and the proponent will be required to seek approval velopment consent will ensure that the development is and/or mitigates the impact of flooding.

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37	Comment	See Submission Adoption of Clause 5.22 - implications for evacuation capacity of Pitt Town (Hawkesbury-Nepean Valley Flood Evacuation Model) Flood Planning Constraint Categorisation - further details/clarity provided in regard to types of development controls for each category. Development of a Flood Chapter for the Hawkesbury DCP - further details/clarity provided in regard to types of development controls for each category. Impacts on Flood Insurance, Financing and Land Values - Options to mitigate the impacts of Council adopting the revised flood level from the Hawkesbury-Nepean River Flood Study and higher flood planning level.	The draft Study and Plan recommends the use of Flood Planning appropriate development controls. However, should Council adop Study and Plan 2025 including these recommendations, planning sense. Rather, there is a process to develop, publicly exhibit and these recommendations into effect. The change in flood levels including the Probable Maximum Flood the impact of global warming to date. It is not a result of this study extensively assessed by state government studies and this study that no option other than the Warragamba raising can address the this reason, it is important that planning levels address this increase methods to assess premiums, and these are not directly linked to withdraw from certain suburbs if they believe the planning levels a It is important that existing and future land holders understand the The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency an appropriate controls/ restrictions based on circumstances of individ lawful development.
38	Object	See Submission Object to raising the Flood Planning Level - negative impacts on property values, saleability, insurance, access to loans, ability to improve property and ability to change use of property. This change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk.	It is important that any major new development or redevelopment purchases properly understand the flood risk. This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p The raising of the Flood Planning Level will result in an increase ir applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and appropriate controls/ restrictions based on circumstances of indivi- lawful development.
39	Object	See Submission Proposed change to the flood control level to 0.5% AEP plus 0.5m. In my view Council should not adopt the report recommendation to raise the flood control level. Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event. It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk.	It is important that any major new development or redevelopment purchases properly understand the flood risk. This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individ lawful development.

ng Constraint Areas and the development of dopt the Hawkesbury Floodplain Risk Management ng controls will not change immediately in a statutory nd adopt flood related development controls to bring

bod is the result of better techniques and specifically idy. Broad scale mitigation options have been dy has looked at more localised options. It is apparent the increase in flood levels due to climate change. For ease in risk. Insurance companies use their own to planning levels. Though insurance companies do s are too low.

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Submission No.		Matters Raised in Submission	Officer Comment
40	Object	 See Submission I urge Council to not adopt the report recommendation to raise the flood control level – and to maintain the flood control level at the existing and conventional 1% AEP level. The stated benefits of the muted change are illusory – raising the flood control level will do nothing to protect the developed townships and will have no relevance to a catastrophic flood event. The economic consequences for the townships of this measure have not been considered. A key component of flood resilience is the financial resilience of the affected homes and businesses. This proposed measure will erode that resilience. I urge Council to recognise and work with the existing historic footprint of development, to continue to promote flood awareness and preparedness, and to work with State bodies on a comprehensive flood evacuation policy. 	Council has an obligation to use the best available information and proposed changes will make new development and large-scale re- investing in renovations or purchasing properties need to understa This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individ lawful development.
41	Object	 Although I understand why there may be a need to raise the flood level from 1:100 to 1:200 to control future development on the floodplain there is another side to this scenario - existing residential properties and businesses and there are no positives for this sector. I was notified by insurance companies that for home and contents they would no longer be insuring properties in Windsor Downs as they have changed underwriters. Even though my land is above the current 1:100. I can only imagine the issues if it becomes 1:200. How many more companies won't offer insurance in some suburbs in the Hawkesbury. Residents living in affected suburbs would be unable to get any insurance forcing them to sell and move out or risk being uninsured. For any insurance companies still offering coverage it would most likely be far more expensive. In the first instance uninsured properties may become a financial burden to both local and state governments during flooding or fires and secondly if residents leave the area because they can't get insurance or can't afford the extremely high costs then revenue from rates etc may decline simply because of falling property values when the flood level becomes 1:200 and more properties are now classed as being below the new flood level. Raising the level to 1:200 will obviously decrease the value of residences in the area even if they were above the 1:100 flood level but are now below the new 1:200 level. In these circumstances to finance a knock down and rebuild, renovations, additions etc for premises below the 1:200 the lender may require flood cover insurance if finance is required. If that is not possible then none of the above can proceed unless finance from a lender is not required. Lenders may also only lend an amount for the value of the land thus requiring the owner to have a far greater deposit (possibly up to 50%) Overall properties will be worth less in a flood zone - cheaper to purchase and have a lower selling price. Ther	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individ lawful development. Insurance companies use their own methods to determine their ov the planning level will not change premiums but it will provide som shouldn't abandon the market as new buildings will be more resilie

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own risk and what they do in marketplaces. Changing ome confidence to insurance companies they silient.

Submission No.		Matters Raised in Submission	Officer Comment
42	Object	 One can understand why there may be a need to raise the flood level from 1:100 to 1:200 to control future development on the floodplain but there is another side to this scenario - existing residential properties and businesses and there are no positives for this sector. I was notified by my insurance company for home and contents (Coles) that they would no longer be insuring properties in Pitt Town as they have changed underwriters. APIA is just another insurer who has also decided not to offer insurance to residents in Pitt Town. Even though my land is 23m AHD that was immaterial as the new underwriter looked at suburbs, not individual properties - and this was at 1:100! Heaven help us if it becomes 1:200! How many more companies won't offer insurance in some suburbs in the Hawkesbury. Residents thus living in particular suburbs and unable to get any insurance may have to sell and move out or risk being uninsured. Those companies still offering coverage would most likely be far more expensive. In the first instance uninsured properties may become a financial burden to both local and state governments during flooding or fires and secondly if residents leave the area because they can't get insurance or can't afford the extremely high costs then revenue from rates et may decline simply because of faling property values when the flood level becomes 1:200 and more properties are now classed as being below the new 1:200 level. In these circumstances to finance a knock down and rebuild, renovations, additions etc for premises below the 1:200 the lender may require flood cover insurance if finance is required. Lenders may also only lend an amount for the value of the land thus requiring the owner to have a far greater deposit (possibly up to 50%) Overall properties will be worth less in a flood zone - cheaper to purchase and have a lower selling price. There are absolutely no positives for existing residents is some suburbs of the Hawkes	Noted. This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and appropriate controls/ restrictions based on circumstances of indivi- lawful development. Insurance companies use their own methods to determine their ow the planning level will not change premiums but it will provide soms shouldn't abandon the market as new buildings will be more resilied appropriate the market as new buildings will be more resilied.
43	Object	 I believe the Council should not adopt the report's recommendation to raise the flood control level. Raising the flood control level will not change the situation for the towns that are already developed and will not make any difference in a major flood event. It also makes no difference to most of the floodplains that sit below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long-established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk. 	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency an appropriate controls/ restrictions based on circumstances of indivi- lawful development. Insurance companies use their own methods to determine their ow the planning level will not change premiums but it will provide som shouldn't abandon the market as new buildings will be more resilied

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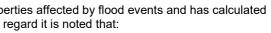
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45	Object	In my view Council should not adopt the report recommendation to raise the flood control level. Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event. It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk.	This Project is a floodplain risk management study and plan using existing flood data/information. Therefore, the management options identified in the proposed Plan, including the raising of the Flood Planning Level, will not change existing flood risk and therefore will have no influence on property insurance or value. The raising of the Flood Planning Level will result in an increase in the area in which development controls can be applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and consequences of flooding, thereby ensuring appropriate controls/ restrictions based on circumstances of individual properties, including allowances for existing lawful development. Insurance companies use their own methods to determine their own risk and what they do in marketplaces. Changing the planning level will not change premiums but it will provide some confidence to insurance companies they shouldn't abandon the market as new buildings will be more resilient.
46	Object	 SUBMISSION TO: Draft Hawkesbury Floodplain Risk Management Study and Plan 2025 Proposed change to the flood control level to 0.5% AEP plus 0.5m. In my view Council should not adopt the report recommendation to raise the flood control level. Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event. It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk. 	This Project is a floodplain risk management study and plan using existing flood data/information. Therefore, the management options identified in the proposed Plan, including the raising of the Flood Planning Level, will not change existing flood risk and therefore will have no influence on property insurance or value. The raising of the Flood Planning Level will result in an increase in the area in which development controls can be applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and consequences of flooding, thereby ensuring appropriate controls/ restrictions based on circumstances of individual properties, including allowances for existing lawful development. Insurance companies use their own methods to determine their own risk and what they do in marketplaces. Changing the planning level will not change premiums but it will provide some confidence to insurance companies they shouldn't abandon the market as new buildings will be more resilient.

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47	Object	 Draft Hawkesbury Floodplain Risk Management Study and Plan 2025 Proposed change to the flood control level to 0.5% AEP plus 0.5m. In my view Council should not adopt the report recommendation to raise the flood control level. Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event. It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without 	This Project is a floodplain risk management study and plan using existing flood data/information. Therefore, the management options identified in the proposed Plan, including the raising of the Flood Planning Level, will not change existing flood risk and therefore will have no influence on property insurance or value. The raising of the Flood Planning Level will result in an increase in the area in which development controls can be applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and consequences of flooding, thereby ensuring appropriate controls/ restrictions based on circumstances of individual properties, including allowances for existing lawful development. Insurance companies use their own methods to determine their own risk and what they do in marketplaces. Changing the planning level will not change premiums but it will provide some confidence to insurance companies they shouldn't abandon the market as new buildings will be more resilient.
48	Object	 achieving any real improvement in managing the flooding risk. In my view Council should not adopt the report recommendation to raise the flood control level. Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event. It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk. 	This Project is a floodplain risk management study and plan using existing flood data/information. Therefore, the management options identified in the proposed Plan, including the raising of the Flood Planning Level, will not change existing flood risk and therefore will have no influence on property insurance or value. The raising of the Flood Planning Level will result in an increase in the area in which development controls can be applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and consequences of flooding, thereby ensuring appropriate controls/ restrictions based on circumstances of individual properties, including allowances for existing lawful development. Insurance companies use their own methods to determine their own risk and what they do in marketplaces. Changing the planning level will not change premiums but it will provide some confidence to insurance companies they shouldn't abandon the market as new buildings will be more resilient.
49	Object	In my view as a local, home occupant, employee and business owner in the Hawkesbury, our Council should NOT adopt the report recommendation to raise the flood control level. Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event. It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level. Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property. I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels. The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk.	This Project is a floodplain risk management study and plan using existing flood data/information. Therefore, the management options identified in the proposed Plan, including the raising of the Flood Planning Level, will not change existing flood risk and therefore will have no influence on property insurance or value. The raising of the Flood Planning Level will result in an increase in the area in which development controls can be applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency and consequences of flooding, thereby ensuring appropriate controls/ restrictions based on circumstances of individual properties, including allowances for existing lawful development. Insurance companies use their own methods to determine their own risk and what they do in marketplaces. Changing the planning level will not change premiums but it will provide some confidence to insurance companies they shouldn't abandon the market as new buildings will be more resilient.
50	Comment	To Whom It May Concern. I write to provide feedback on the Draft Hawkesbury Floodplain Risk Management Study and Plan 2025, with a focus on the critical importance of revisiting the proposed flood level measures.	

Submission No.	Matters Raised in Submission	Officer Comment
	While the plan acknowledges significant challenges and proposes valuable solutions, there are key areas requiring reconsideration to ensure equitable and sustainable outcomes for all affected communities.	
	Revising Flood Levels to Avoid Widespread Impact:	
	The current proposal to increase the flood level may directly impact approximately 300 properties However, it will disproportionately adversely affect over 15,000 properties already burdened by frequent flooding. This approach risks exacerbating vulnerabilities for a large portion of the population, including financial, social, and economic disadvantages. Residents in areas such as South Windsor and McGrath's Hill are particularly at risk: Without proper support and planning, these towns could devolve into economically depressed areas, where property owners—overwhelmed by repeated flooding and insufficient recovery options—are unable to maintain or improve their homes. This could lead to the creation of ghettos and amplify existing inequalities, leaving residents with fewer opportunities to rebuild or relocate.	 the tangible flood damages for each defined flood event. In this refines the tangible flood damages for each defined flood event. In this refines the tangible flood damages for each defined flood event. In this refines \$1,985,984,728. In a 0.5% (1 in 200) AEP flood event 7,211 properties (6,263 \$2,920,302,887. This highlights that an additional 1,823 properties are affected in a 1% (1 in 100) AEP event resulting in an additional cost of \$934,31 property, which is significant compared to the average cost of dame event has higher damages; being \$602,533 per property. In addition, it is noted that whilst an additional 1,823 properties be Level, only 116 of these lots are vacant commercial and industrial The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Planning and development controls are based on the frequency are appropriate controls/ restrictions based on circumstances of individuational development. The draft Study and Plan recommends the use of Flood Planning appropriate development controls. However, should Council adop Study and Plan 2025 including these recommendations, planning
		sense. Rather, there is a process to develop, publicly exhibit and a these recommendations into effect.
	Promoting Resilient and Adaptive Solutions:	
	Rather than increasing the flood level, the plan should prioritize measures that enhance resilience and enable quicker recovery for flood-affected residents:	
	1. Encouraging Resilient Buildings:	
	Introducing planning controls that require existing buildings to be rebuilt to higher flood resilience standards will reduce the long-term impact of flooding. Strengthened infrastructure is key to supporting families and businesses in returning to normalcy more swiftly.	Current development controls support all developments, including resilient standards. Future development controls will also support
	2. Rebuilding and Retrofitting:	
	Providing incentives and guidance for retrofitting existing homes with flood-resistant materials or designs will ensure that affected residents have the tools to protect their properties and livelihoods.	Noted.
	3. Rezoning for Long-Term Safety and Sustainability:	
	Rezoning properties in high-risk areas to more suitable uses, such as open spaces or commercial flood-tolerant activities, would address safety concerns while reducing the economic strain on individual households. Coupled with a buy-back scheme, rezoning can help residents transition to safer living environments without suffering financial losses.	Rezoning land would involve reducing land use potential of the lan Council would be open to having to provide compensation. The dr zonings within the floodplain, and do not propose any changes. C Flood Policy provides suitable considerations/requirements to appr risk. The buy-back scheme adequately works without the necessit
	Recommendations for Inclusion in the Plan:	
	Introduce targeted buy-back schemes for the most vulnerable properties, supported by rezoning efforts.	See above comment.
I		1



es affected (4,766 above floor) with total damages of

3 above floor level) are affected with total damages of

n a 0.5% (1 in 200) AEP flood event compared to the 318,159 in damages. This equates to \$512,517 per amages for other flood events. Only the 1% AEP

be affected by an increase in the Flood Planning al lots and 65 are vacant residential lots.

in the area in which development controls can be

and consequences of flooding, thereby ensuring vidual properties, including allowances for existing

g Constraint Areas and the development of opt the Hawkesbury Floodplain Risk Management ig controls will not change immediately in a statutory ad adopt flood related development controls to bring

ng rebuilding of existing structures, to high flood ort this philosophy.

and and therefore also land values. As a result, draft Study and Plan has reviewed the current Council's current Local Environmental Plan and opropriately regulate development based on flood sity for rezoning first.

Submission No.		Matters Raised in Submission	Officer Comment
		Rezoning flood affected properties to more suitable resilient uses would give the current owners uplift in value which may reduce the need for Government assistance in the form of buy back schemes.	See above comment.
		 Implement mandatory rebuilding standards that prioritize resilience and adaptability in high- risk areas. Rebuilding existing homes should be encouraged to improve resilience. Encouraging the rebuilding of homes affected by flood could improve recovery time and resilience of communities. 	Current development controls support all developments, including resilient standards. Future development controls will also support
		 Focus on community support programs to help residents transition effectively, including financial assistance and clear communication of options. 	Noted.
		• Re-evaluate flood level adjustments to prevent undue burden on the existing 15,000 properties already facing challenges. Focus on the improvement of the resilience of homes by way of building standards that could be developed with the collaboration of Government and the Insurance Council of Australia. This should be a priority, rather than just increase the flood planning level.	See above comments.
		Conclusion	
		The Hawkesbury region requires a flood risk management strategy that balances safety, equity, and economic sustainability. Increasing the flood level as proposed risks leaving thousands of residents more vulnerable, financially strained, and socially disadvantaged.	
		Instead, we must focus on building resilience through strategic planning, modernized infrastructure, and rezoning that aligns with long-term safety goals.	
		Thank you for considering this submission.	
		I urge the Council to adopt an approach that minimizes harm while fostering a stronger, more resilient Hawkesbury for all.	
		Draft Hawkesbury Floodplain Risk Management Study and Plan 2025	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the
		Proposed change to the flood control level to 0.5% AEP plus 0.5m.	change existing flood risk and therefore will have no influence on p
		In my view Council should not adopt the report recommendation to raise the flood control level.	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
		Raising the flood control level won't change the situation for the towns that are already developed and won't make any difference to a major flood event.	Planning and development controls are based on the frequency ar
51	Object	It also makes no difference to most of the flood plain that's sitting below the existing 1 in 100 flood level.	appropriate controls/ restrictions based on circumstances of individ lawful development.
		Raising the flood control level will have a major negative impact on property values, saleability, insurance, access to loans, ability to improve property, and ability to change use of a property.	Insurance companies use their own methods to determine their ow the planning level will not change premiums but it will provide som shouldn't abandon the market as new buildings will be more resilie
		I believe this change would be unfair to those affected who bought or developed properties in areas subject to the long established 1 in 100 flood levels.	
		The proposed change will lead to the neglect of properties and financial hardship, without achieving any real improvement in managing the flooding risk.	
52	Object	There will be negative results to existing property owners and small businesses with this change to flood levels.	Noted

ing rebuilding of existing structures, to high flood port this philosophy.

ing existing flood data/information. Therefore, the the raising of the Flood Planning Level, will not on property insurance or value.

in the area in which development controls can be

y and consequences of flooding, thereby ensuring dividual properties, including allowances for existing

r own risk and what they do in marketplaces. Changing some confidence to insurance companies they silient.

Submission No.		Matters Raised in Submission	Officer Comment
		The Hawkesbury Business Group (HBG) represents the interests of businesses across the Hawkesbury Local Government Area, advocating for sustainable economic growth and resilience.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on
		With the forthcoming Western Sydney Airport and the associated economic opportunities, it is critical that the Floodplain Risk Management Study and Plan 2025 considers the unique needs of businesses operating within the floodplain.	The raising of the Flood Planning Level will result in an increase i applied to increase the resilience of development to flooding.
		The floodplain encompasses industries uniquely positioned to adapt to periodic inundation, such as agriculture, logistics, and production. These industries are not only integral to the Hawkesbury economy but also support broader regional growth. To ensure their continued viability, the plan must prioritize retrofitting existing premises with flood-resilient infrastructure and allow for adaptive construction methods tailored to floodplain conditions.	Planning and development controls are based on the frequency a appropriate controls/ restrictions based on circumstances of indiv lawful development. Insurance companies use their own methods to determine their o
53	Comment	Retrofitting measures, including elevated building designs, the use of flood-resistant materials, and the protection of critical operational systems, would enable businesses to recover swiftly after flood events. Equally, varying the criteria for future construction by integrating adaptive techniques—such as elevated platforms, modular designs, and water-tolerant structures—will allow floodplain industries to maintain productivity while effectively managing risk.	the planning level will not change premiums but it will provide son shouldn't abandon the market as new buildings will be more resili
		A one-size-fits-all approach to flood management could inadvertently stifle businesses that are better suited to operate on flood-prone land. The plan must acknowledge and support these industries' adaptive capacities by incorporating targeted strategies that balance flood mitigation with economic sustainability. The Hawkesbury floodplain is a cornerstone of regional growth, and the businesses that operate within it are vital to Western Sydney's expansion. By focusing on retrofitting and adaptive construction, the Hawkesbury City Council can ensure these industries continue to thrive, contributing to the local economy and enhancing the region's resilience to future challenges.	
		Adopted Terminology Whilst a great deal of effort has been put into trying to clarify flood frequency terminology, it seems to have made describing a level of expected flooding more confusing. For example, a flood may start as a very frequent event and then change to a frequent/rare or very rare event. Why not just stick to AEP (%) for consistency.	The rationale for the terminology used has been outlined in the drindustry practice.
		Table 1 - what is Design Flood Level - include in glossary	Included.
		Page xvi - refers to rising of Warragamba Dam - should be raising	Amended.
		Table 3 - FM5 - survey of levels should include review of reports leading up to implementation of existing levels and associated plans (available within council) to compare with existing structures and current level of service - including flood gates	The draft Study and Plan recommends the maintenance, repair, r flood mitigating infrastructure. This will be included in the final Pla
		PM6 - more vulnerable uses - should be users	Amended to clarify the intent of this option.
54	Comment	2.6.1 Land Use I would have thought the majority of flood affected land is primary production/recreation with the remainder being residential/industrial.	Noted.
		2.6.3 Local Council policy - 2nd para, 3rd last line - local environmental plan should be "plans"	Noted.
		3. Available Data 3.1 Flood Model - what are GPU cards	Amended.
		4. Community Consultation 4.1 Hawkesbury Floodplain Management Committee - does the committee not have any elected representatives anymore or are they included as Council management?	Revised.
		5. Existing Flood Behaviour 5.1 Design Flood Behaviour - I do not understand why there are significant increases in flood levels in extreme events caused by "bend losses" in the "tightest bends"- I would have imagined that most bend losses would have occurred whilst the flow was within the channel - once the flood had exceeded the channel, particularly at larger events, flow would be almost linear from Camden to Sackville	Noted. This information sourced from the Hawkesbury-Nepean R Reconstruction Authority.

ing existing flood data/information. Therefore, the the raising of the Flood Planning Level, will not on property insurance or value.

in the area in which development controls can be

y and consequences of flooding, thereby ensuring dividual properties, including allowances for existing

own risk and what they do in marketplaces. Changing ome confidence to insurance companies they silient.

draft Study and Plan and is consistent with current

r, replacement, and overall management of existing Plan as an action.

n River Flood Study (2024) prepared by NSW

Submission No.	Matters Raised in Submission	Officer Comment
	Table 9 - Floodway - 3rd dot point "flood flow, which my" should be may	Amended.
	Flood Fringe - 2nd dot point - one would think cumulative development in flood fringe areas, if allowed would ultimately impact the pattern of flood flows, storage and/or flood levels.	Development does have an impact on flows and flood levels, however it is not significant and therefore not prohibitive for future land use.
	6.0 Consequences of Flooding on the Community The first paragraph lends itself for the reader to think that all "flooding affects the Hawkesbury Community much worse than in most locations in NSW", however the remainder of the paragraph relates to PMF and 1% AEP. Perhaps the paragraph should commence by saying "Major flooding affects"	Noted.
	6.1 Hawkesbury-Nepean Flood Evacuation Modelling Again, the extreme risk to life in the Hawkesbury-Nepean occurs in major flood events. The paragraph should perhaps read "Due to the extreme risk to life during major flood events in the"	Noted.
	6.2 Road Overtopping and length of inundation 1st para. 2nd sentence - "Due to the extent and depth" should read "subject to the extent and depth" (obviously depending on the severity of the event)	Noted.
	1st para. last sentence - should refer to Ferry Services, not just Ferrys being cut	Amended.
	Table 10: Low level crossings and their typical period of closure in a 1% AEP event should read typical "estimated" period as there is no typical period.	Amended to clarify that the period of closure is given for a 1% AEP design event.
	Table 11: 3rd column should read Flood levels for "estimated" 1% AEP at	Table 11 shows 'Design Flood Levels at Low Points in Roads', therefore there is no need for this amendment.
	Table 12: Inundation Times of Road Low points During Typical "Estimated" 1% AEP Flood Event	Amend to refer to 1% AEP design flood event.
	Why is Kurmond Road not identified as an evacuation route (for Wilberforce/Ebenezer etc.)	The roads listed are formal evacuation routes identified by NSW State Emergency Services.
	Diagram 2 Locations on identified roads should be added	The roads identified in Table 12 that are impacted in a 1% AEP design flood event are labelled on Diagram 2.
	6.4 Economic Impact of Flooding Diagram 3 - Serious injury/loss of life should have a tangible cost - Residential opportunity - grant availability to move out of flood plain	The methodology for determining the costs associated will flooding is outlined in Section 6.4, including consideration of both tangible and intangible factors in the determination of costs.
	6.4.1 - I don't see the value that could be achieved by doing a further detailed survey of properties.	Noted. Detailed survey is suggested for future studies and the value of such a survey can be considered at that time.
	6.4.2.1 - Internal damages were assumed (add "to") follow Considering the variability of assets provided at caravan parks, toilet blocks, administration, games rooms etc. this figure seems low	Amended.
	6.4.2.2 - Structural damages were assumed (add "to") follow - if it has been identified that some buildings may have to be demolished in a 1% AEP event, there should be a cost attributed to make the numbers realistic.	Amended.
	6.4.2.3 - Direct External Damages - seems low when considering the likely quality of the buildings affected and the fact that they will likely need replacement along with fencing etc.	External damages (laundry/garage/yard/vehicle) were assumed to \$13,860 for houses on the basis that the majority of vehicles and items are moved by residents. The methodology used to determine the costs of flooding is in accordance with industry best practice.
	6.4.2.4 Indirect Damages - again estimated costs seem low - additional accommodation and loss of rent would probably equate to less than 1 month at the amount identified.	Noted. The methodology used to determine the costs of flooding is in accordance with industry best practice.
	6.4.3.1 - Non-residential Properties Damages - there could be significant costs to primary production properties due to clean-up, erosion repairs, re-planting etc.	Noted. The methodology used to determine the costs of flooding is in accordance with industry best practice.
	6.4.3.2 - Similarly, caravan parks may have damage to boat ramps, septic systems, roads, swimming pools, tennis courts etc.	Noted. The methodology used to determine the costs of flooding is in accordance with industry best practice.

Submission No.		Matters Raised in Submission	Officer Comment
		6.4.4 - Summary of Damages - 3rd line this flood damage estimates - should be "these" flood damage estimates	Amended.
		Table 14 - how are the Average Annual Damages (AAD) estimated/defined?	The methodology for determining the Average Annual Damages is
		8.4.1 Flood Access - Transport for NSW is currently undertaking concept design for a higher-level bridge for North Richmond.	Amended.
		There is a major opportunity lost with this project in not taking into account additional traffic generating development with the proposed extension of Redbank to the west and the proposed development of Hambledon Park on Terrace Road at North Richmond.	Noted. These proposals have not been determined. If approved, flood evacuation will be considered with nay future studies.
		The alternative route identified as an extension of The Driftway through to Grose Vale Road (NOT EXTENDING THROUGH THE CURRENT REDBANK DEVELOPMENT) at a 1% AEP level west of Castlereagh Road would give the opportunity to split traffic demand from the North Richmond/ Grose Vale/Grose Wold/Bowen Mountain/Kurrajong areas from other traffic generated from the west and northwest of North Richmond. It would also give additional access to residents west of the river in flood events greater than the 1 in 20 AEP and also provide an alternate evacuation route for Richmond residents in an event up to the 1% AEP event if required.	
		8.4.4.1 Flood Planning Levels It is a huge jump, with little justification to jump from a 1% AEP with freeboard to a 0.5% AEP level with freeboard. The consequences of such a decision are far reaching, particularly to residents who over the years have built to floor levels adopted/imposed by Council over time. The implications in relation to insurance costs and property values of those residents are enormous.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
		This recommendation should not be supported.	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
			Planning and development controls are based on the frequency an appropriate controls/ restrictions based on circumstances of indivi- lawful development.
			Insurance companies use their own methods to determine their ow the planning level will not change premiums but it will provide som shouldn't abandon the market as new buildings will be more resilie
		8.5.1 Flood warning (RM1) Whilst continual education/reminders of flood danger/warnings are supported, it has to be done in a manner where it is retained in the community otherwise the impetus and knowledge trying to be conveyed will be ignored/lost. Fridge magnets specific to identified areas showing evacuation routes would be worth considering.	Noted. Will be considered when implementing these actions.
		Table 32 PM6 - concerns - more vulnerable uses (should be users)	Amended to clarify the intent of this option.
		Finally - The Breakaway, Freemans Reach I have observed over the past few floods that the river at, and to the west of The Breakaway appears to be silting. This will, if not addressed cause increased water levels upstream of this area in flood events and ultimately, as the name suggests will cause the river to break its banks, and possibly once again gouge its way across farmland to attempt to rejoin the main channel downstream of Windsor causing significant damage. The buildup in the bed needs to be investigated and addressed.	Noted.
		See Submission	
55	Object	Raising Flood Planning Level (Current FPL 17.4mAHD. Proposed FPL 18.5 mAHD. Increase of 1.6m)	
		Council should clarify whether flood-related development controls and the method for determining the applicability of these controls will be updated and, if so, identify how they will be updated.	The draft Study and Plan recommends: o a Flood Chapter in the DCP
			 development controls based on Flood Planning Con

s is outlined in Section 6.4.
ed, the impacts of these development on flooding and
ing existing flood data/information. Therefore, the the raising of the Flood Planning Level, will not on property insurance or value.
e in the area in which development controls can be
and consequences of flooding, thereby ensuring lividual properties, including allowances for existing
own risk and what they do in marketplaces. Changing ome confidence to insurance companies they silient.

Constraint Categories

Submission No.		Matters Raised in Submission	Officer Comment
		<u>Flood-Related Development Controls</u> Requests that further details and clarity be provided regarding the types of development controls that would be proposed for each of the FPCCs	The draft Study and Plan recommends the review of, and change the Flood Planning Level, the use of Flood Planning Constraint Ar development controls. However, should Council adopt the Hawke 2025 including these recommendations, planning controls will not there is a process to develop, publicly exhibit and adopt flood rela recommendations into effect.
		Adoption of Clause 5.22	
		Council provide further details and clarity regarding the types of development controls that would be proposed for areas above the FPL	Clause 5.22 (standard wording) relates to controlling 'sensitive an evacuation/safety considerations are required. The adoption of C Plan 2012 is discussed in detail in the Report, with a recommendation of the commendation of
		Clarification on the implications for the evacuation capacity of Richmond based on FEM	The Flood Evacuation Model is not available for use outside of the Evacuation Model outcomes will be considered in the NSW Recor Adaptation Plan for the Hawkesbury-Nepean Valley. Council will in this matter.
			NSW State Emergency Services has reviewed the document and capacity/matters.
			Evacuation capability is based on design flood event/Flood Planni change. The current condition for an evacuation capability assess practicality will be reviewed with the development of the Developm
		Voluntary Purchase	
		Supported.	Noted.
		Development of Flood Chapter	
		Further details and clarity be provided regarding the types of development controls that would be proposed and how they would differ from the existing development controls set out in the Flood Policy.	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Plan frequency and consequences of flooding, thereby ensuring approp of individual properties, including allowances for existing lawful de
			The draft Study and Plan recommends the review of, and changes the Flood Planning Level, the use of Flood Planning Constraint Ar development controls. However, should Council adopt the Hawke 2025 including these recommendations, planning controls will not there is a process to develop, publicly exhibit and adopt flood rela- recommendations into effect.
		Infill residential development	
		Impacts of infill development (particularly residential) on evacuation capacity	See Previous Comments under Clause 5.22 re: evacuation.
		Transition Arrangements	
		Transition arrangements for existing development.	Development controls for existing development will be based on p improvements in flood resilience.
56	Comment	It is recommended that Council assess the implications of the new flood planning level in collaboration with NSW floodplain management guidelines to determine suitable adaptations or exemptions for waste management infrastructure. We advise conducting further analysis of development controls and considering options for flood	The draft Study and Plan recommends the review of, and changes the Flood Planning Level, the use of Flood Planning Constraint Ar development controls. However, should Council adopt the Hawke 2025 including these recommendations, planning controls will not there is a process to develop, publicly exhibit and adopt flood rela recommendations into effect.
		mitigation to support sustainable operations at the Hawkesbury City Waste Management Facility and adjacent areas.	Planning and development controls are based on the frequency a and its vulnerability to flooding thereby ensuring appropriate contr individual properties/uses, including allowances for existing lawful

ges to, Council's planning framework, including raising Areas and the development of appropriate vkesbury Floodplain Risk Management Study and Plan not change immediately in a statutory sense. Rather, elated development controls to bring these

and hazardous' uses and 'particular risk to life' where f Clause 5.22 into Hawkesbury Local Environmental ndation not to incorporate it into the Plan.

the NSW Reconstruction Authority. The Flood construction Authority's development of the Disaster *i*ll be reliant on State Government guidance/direction

nd have raised no concerns in relation to evacuation

nning Level which includes considerations for climate essment under Council's Flood Policy, and its opment Control Plan Flood Chapter.

e in the area in which development controls can be lanning and development controls are based on the propriate controls/ restrictions based on circumstances development.

ges to, Council's planning framework, including raising Areas and the development of appropriate wkesbury Floodplain Risk Management Study and Plan not change immediately in a statutory sense. Rather, elated development controls to bring these

practicality in meeting floor height standards and

ges to, Council's planning framework, including raising Areas and the development of appropriate vkesbury Floodplain Risk Management Study and Plan not change immediately in a statutory sense. Rather, elated development controls to bring these

/ and consequences of flooding, type of development, ntrols/ restrictions based on circumstances of ful development.

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Submission No.		Matters Raised in Submission	Officer Comment
57	Object	Adding my property into the flood planning area even though it is >20 metres well above the Hawkesbury City Council flood planning floor level will significantly affect my property value. We purchased a 1/4-acre block in Bligh Park with R3 zoning for the potential increase in land value. All this will do is reduce my property value and make insurance prohibitive. Perhaps the Council and NSW State Government should look into flood resilience in the Hawkesbury Nepean and flood proof evacuation routes and consider levies to the 1% AEP to protect the majority of properties from the more likely flood events.	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding. Plan frequency and consequences of flooding, thereby ensuring approp of individual properties, including allowances for existing lawful dev It is noted that if the respondent's property is above 20m AHD and are within the proposed flood planning area. Regardless, the prop Maximum Flood and therefore has always been located on the flood
			The NSW State Government, including Transport for NSW and the respect to road resilience for flood evacuation purposes, and deve
		I oppose the proposed change to the flood control level - it does not improve flood resilience and will have serious negative consequences for existing property owners.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
			The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
58	Object		Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individ lawful development.
			Insurance companies use their own methods to determine their ow the planning level will not change premiums but it will provide som shouldn't abandon the market as new buildings will be more resilie
		While I support HCC for being proactive towards flood management, I think some of these changes are excessive. For example, in the July 2022 flood (14m) a lot of properties in this location were affected by flood water (and none of the houses on Threlkeld drive were flooded). In my opinion, the existing 1 in 100 flood event level (17m) is appropriate for new developments	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
50	Object	and modifications or amendments to existing houses in this area. Bearing in mind that flood mitigation measures at Warragamba are being proposed by the state government which will help future potential flooding. Please do not change the minimum flood level to the 1 in 200 event, the	The raising of the Flood Planning Level will result in an increase in applied to increase the resilience of development to flooding.
59		potential effects from increased insurances to renovation costs etc will only have a detrimental effect on our properties.	Planning and development controls are based on the frequency ar appropriate controls/ restrictions based on circumstances of individ lawful development.
			Insurance companies use their own methods to determine their ow the planning level will not change premiums but it will provide som shouldn't abandon the market as new buildings will be more resilie
60	Object	My million dollar investment into my future aka my house, with its carefully planned and researched purchase is going to be worth diddly squat now because someone has marked half of it as floodable? Is this a direct consequence of the mass production of housing and concrete jungle in Marsden Park, affecting the natural run offs? Why do I get penalized by this?	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
61	Object	I do not support the changes. We are not classified in this mapping to be flood prone however I believe that the changes are not required and are over exaggerated. It will cause us and many around us to lose property value. Land rates are ridiculous and unfairly charged also.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
62	Object	My daughter would now live in a flood zone with these changes. As her property will lose value and her insurance will increase, what compensation ate you offering particularly as they have not been impacted at all be previous floods. Are your expectations that further floods will be higher? If so why?	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
63	Object	Based upon the Flood planning Area and PMF extent it makes no sense to apply the Vineyard Stage 2 development. This should not go ahead. Small block ownership in this PMF area also makes it harder and more costly do develop (civil works, roads, etc - due to small land plots - ie. 300sqm as opposed to developing acreage lots) increasing Hawkesbury Council Costs and risk associated with flooding. Instead housing development away from the FPA and PMF should continue to occur along Boundary Road up to old Pitt Town Road where there will be a 4-lane road from Windsor Road. This encompasses continuing housing development North from Menin	Noted

in the area in which development controls can be anning and development controls are based on the ropriate controls/ restrictions based on circumstances development.

nd located in Bligh Park, then it is unlikely that they operty would be located below the Probable floodplain and considered to be flood liable.

the Reconstruction Authority are undertaking work in velopment a regional disaster adaptation plan.

ng existing flood data/information. Therefore, the the raising of the Flood Planning Level, will not n property insurance or value.

in the area in which development controls can be

and consequences of flooding, thereby ensuring ividual properties, including allowances for existing

own risk and what they do in marketplaces. Changing ome confidence to insurance companies they ilient.

ng existing flood data/information. Therefore, the the raising of the Flood Planning Level, will not n property insurance or value.

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Submission No.		Matters Raised in Submission	Officer Comment
		Road along Boundary Road up to Old Pitt Town Road, then Hanckel Road and back down Bocks Road to the current development. The pocket of land ownership are all acreage blocks making development much easier and use of current facilities supplied by the Box Hill development.	
64	Object	The Hawkesbury River has a hairpin bend at Wisemans Ferry. To divert flood water coming down the Hawkesbury River and save residents at Wisemans Ferry, Lower Macdonald and others along the Macdonald River, a diversion of flood water should be cut/created which only operates during elevated water levels (floods) such that the excess water running down the Hawkesbury is diverted across the open land before the hairpin bend and re-enters the Hawkesbury River after the hairpin bend. This will save residents in Wisemans Ferry and Lower Macdonald and others along the Macdonald River (which backs up when excess water is running down the Hawkesbury River and so water cannot exit the Macdonald River - like a bath effect up the Macdonald River).	Noted.
65	Object	As my property is on the same level as the airstrip, I don't believe it should be classed as a flood zone.	Land located below the Probable Maximum Flood level is located flood prone.
66	Object	Considering this is a proposal for the flood risk management, I would have liked to see the visual outline of the proposed change in the flood planning area, as well as the outline of the proposed freeboard area.	Noted.
67	Object	So all the first home buyers that have bought in the Hawkesbury there property will be worth a lot less and also insurances will go up worst case insurance companies will not insure the properties at all because of the added risk not to mention banks will be less likely to lend due to the heightened risk I really don't see what this will achieve why aren't they putting their effort into flood mitigation.	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
68	Object	What about all the housing that has taken up valuable ground to soak up water that now goes into our creeks/waterways that now backs up and causes additional flooding that was not there b4. I know Baulkham Hills approved all the development, but the impact is seen in the Hawkesbury. Hawkesbury Council needs to be aware of the impact on the same development.	Noted for further consideration.
69	Object	Will the Council be lowering rates to match the loss of property value?	This Project is a floodplain risk management study and plan using management options identified in the proposed Plan, including the change existing flood risk and therefore will have no influence on p
70	Object	What consultation has been had with neighbouring councils to stop the development along the floodplain AND the raising of the land? Every flood this year has risen much faster than before due to the direct effect of increased housing and added landfill in Marsden Park.	Noted for further consideration.

d on the floodplain and therefore defined as being	
ng existing flood data/information. Therefore, the he raising of the Flood Planning Level, will not n property insurance or value.	
ng existing flood data/information. Therefore, the he raising of the Flood Planning Level, will not n property insurance or value.	
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