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Subject: DA2023/095

52/54 Brighton Street Planning

It appears this application has not been referred to the Councils flood management officers for response. It has only been referred to the Water Management team who did not comment on the flood risk to the seniors' for this development.

Council's online portal states Seniors Housing is prohibited at this property. This begs the question as to why we are even considering such an application.

The bio retention ponds appears to be within the Council road reserve, and outside the parcel of land. This is unacceptable and planning proposals are to be within the boundary of the land.

Flooding

The property is situated within an overflow path and is therefore considered flood affected.

The NSW State Government Flood Policy aims to protect life and property. This is reiterated in the objectives of the Warringah DCP – E11 Flood and Council's Water Management for development policy (2021) Section 10.3.4. This DCP states seniors living as vulnerable development and it is believed the requirements of this DCP have not been met and will be placing additional vulnerable people at risk. The Water Management for Development Policy states "future occupants of the floodplain are not subject to an unacceptable level of flood risk."

The Flood Report submitted states it is low hazard and shelter in place is suitable. However, Greendale Creek FS appendix E, figure 5 shows there is H3 hazard for the 1% AEP event. This is unsafe for vehicles, children and the elderly. Figure E6 shows the PMF results which shows the overflow path is H4-H5. The Flood Report submitted states shelter in place is suitable for seniors living, however with this level of hazard to the site, it proves this site is not suitable for seniors development.

The Flood report also states the building will be built in flood compatible materials, however it is unlikely to be built to withstand the hydraulic forces of the PMF rendering it unsuitable for shelter in place.

The Draft Greendale Creek Flood Study (section 9.6.8) states the drainage line through the private properties of Harbord Park to Bennett St has a capacity of 50%-10% AEP (2-10year ARI). Anything above this will be overland flow through the proposed site for redevelopment and placement of vulnerable people. With increased storm intensities, there is more likely there will be additional overflow in the future. This contradicts both State and NBC planning instruments and cannot meet numerous requirements.

The flood report submitted with the application (RTS, July 2023) also proposes a Flood Wall (no specifications given) along western and eastern boundary and the Stormwater drawings show a flood wall on northern and eastern side of the property. It is inconsistent and will cause additional flooding for Brighton Street. This again is going against all levels of govt policy for flood management and will put additional risk to Brighton Street.

We strongly oppose this development and believe it will have major negative affect on ours and all surrounding properties.

Richard and Jackie Feledy