

01 February 2023

Dear Adam Richardson,
Northern Beaches Council

Development Application No: DA2022/1860 for Alterations and additions to an existing commercial premises (Palm Beach Golf Club) at 2 Beach Road PALM BEACH.

In response to your issues identified:

Building Assessment- Fire and Disability

Michael French has since confirmed with me that the correct BCA Report (Issue B) has been referred to and an amended BCA Report is not required.

Stormwater and Floodplain Engineer

Council's Stormwater and Floodplain Engineer has reviewed the proposed development

and made the following comments:

The proposed site from Beach Road is affected by the Medium Flood Risk Precinct. The existing floor level is below Flood Planning Level of 3.11m AHD (FPL).

The proposal is considered non-compliant with C4 of Section B3.11 of Council's DCP.

Control C4 states that "A one-off addition or alteration below the Flood Planning Level of less than 30 square metres (in total, including walls) may be considered only where:

"(a) it is an extension to an existing room; and

(b) the Flood Planning Level is incompatible with the floor levels of the existing room; and

(c) out of the 30 square metres, not more than 10 square metres is below the 1% AEP flood level."

The proposed additional area is approximately 18m² which is 150mm below 1% AEP flood extent. The proposal is considered non-compliant with C4 of Section B3.11 of Council's DCP.

Justification for variation of this control:

The Flood Engineer, Youssef Riad from NY Civil Engineering has outlined additional justification to support a departure from strict compliance to Control C4 Section B3.11

Justification for the variation to Council's DCP is as follows;

1. The finished floor level to the 'Green Keepers meal room' and 'office/files room' will be increased a further 50mm to RL 2.99m AHD to achieve additional height above external finished levels (updated plans supplied).
2. The low depth of flooding, resulting in a possible 90mm of inundation, does not pose a risk of injury or loss of life to the occupants, or significant damage to property.
3. The proposal does not expose existing occupants of the development to greater risk of injury/loss of life, or increase the number of occupants to the site.
4. The proposal incorporates an additional egress point from the building through the 'meal room. The meal room can evacuate safely both into the building and outward to the car park, further minimising risk of injury/loss of life.
5. The proposal does not increase the flood depth, risk, or hazard levels, and has no impact on adjoining properties.
6. Considering the significant size of the existing development, the proposal variation is proportional to what would be considered a 'minor' development.

Further to the Flood Engineer's comments I would like to add the following:

1. The proposal is a unique situation that involves a minor increase the GFA of the existing development, which is located fully within the existing building footprint.
2. *out of the 30 square metres, not more than 10 square metres is below the 1% AEP flood level.*" is an obscure equation that may not be effectively targeted to this location and class of building. Furthermore, an additional 8m² beyond the control requirements would be considered minor, given the size of the existing building and the site it resides upon.
3. This proposal is surround by large bitumen carpark and driveways that can effectively transport flood water around the building to the street ensuring no additional impacts to surrounding properties.

4. Strict application of the control in this circumstance hinders the positives of adaptive reuse of the existing structure. Flexibility of the control would reduce the requirement for additional freestanding development on site or on the golf course grounds.
5. There is no net increase of in numbers of occupants of the public or staff due to the development. The areas proposed are for administration and commercial use only. Staff meal room and office/files room are intended for sporadic use during business hours, further limiting any exposure to flood injury or loss of life.
6. The increase of the floor height by 50mm to provide a compliant step down to the existing carpark level further reduces flood impacts.
7. Raising the floor height by the suggested 150mm is not ideal due to existing ceiling heights and structural beam locations (refer to Section and plans). The new proposed FFL (increase of 50mm) of the Office Files Room and the Meal Room is 2.99.
8. The existing floor level of the development was set many decades ago when the club was constructed, noting this was a compliant floor level at the time. Strict adherence to the controls by raising the floor levels 150mm for the extent of the extension would render the 2 rooms awkward and not fit for purpose.
9. An additional point of egress of the building increases safety of the occupants of the building in the event of flooding or fire.
10. Flood compliant electrical work would be incorporated, as it has been throughout the ground level for other recent Council approved development.

We request that Council show mild flexibility in this merit based assessment due to the minor nature of development to this existing community serving club. We believe strict adherence to the C4 B3.11 Control is not warranted in this circumstance and approval should not be unreasonably withheld.

Kind Regards,



Wade Cogle

Hot House Architects

