

## Natural Environment Referral Response - Flood

<b>Application Number:</b>	DA2024/0460
<b>Proposed Development:</b>	Demolition works and construction of shoptop housing
<b>Date:</b>	11/06/2024
<b>To:</b>	Adam Croft
<b>Land to be developed (Address):</b>	Lot 188 DP 16719 , 3 Gondola Road NORTH NARRABEEN NSW 2101 Lot 187 DP 16719 , 1 Gondola Road NORTH NARRABEEN NSW 2101

### Reasons for referral

This application seeks consent for the following:

- All Development Applications on land below the 1 in100 year flood level;
- All Development Applications located on land below the Probable Maximum Flood levels.

And as such, Council's Natural Environment Unit officers are required to consider the likely impacts on drainage regimes.

### Officer comments

The proposal seeks consent for a major redevelopment at 1-3 Gondola Road, North Narrabeen. The works involve the removal of all existing site structures and construction of a four-storey shop top housing development including 14 residential apartments, two ground floor retail tenancies, ground floor carparking, residential and commercial bin rooms, a basement carpark and a rooftop communal area.

The development is considered major. The property is located in a High Flood Risk Precinct area, Flood Storage Area, H5 Flood Hazard Area. The 1% AEP flood level (with climate change) is 3.9m AHD, the flood planning level for the site is 4.4m AHD and the Probable Maximum Flood (PMF) level (without climate change) is 4.89m AHD.

Council is not satisfied that the proposal is compliant with Section B3.11 and B3.12 of the Pittwater 21 DCP 2021 and Clause 5.21 of the Pittwater LEP 2014.

Reasoning provided below:

#### **Flood Effects Caused by Development**

A2 - In all events up to the 1% AEP event there is to be no net loss of flood storage. The FERP calculates a loss of flood storage of approximately 262 meters (47% loss of flood storage). Note that the existing structures (Demolished 2009) on 1 Gondola Road are considered in the storage calculations. The proposed justification that this loss of flood storage is negligible is not accepted. The FERP does not consider the cumulative adverse impact if this level of flood storage loss was allowed throughout the catchment. Flood storage is generally provided through flood storage tanks or a void between the basement and ground floor.

### **Floor Levels**

C1 - The proposed residential and commercial bin room floor levels are 2.03m AHD. To be supported these rooms must be raised to or above the FPL.

C3 - All new development must be designed to ensure no net loss of flood storage in all events up to the 1% AEP event. The proposed development results in a net loss of flood storage so is not supported (refer comments above). Flood storage compensation for the 1% AEP flood at the site must be incorporated in the plans for it to be supported.

### **Car Parking**

D6 - All enclosed car parks (including basement car parks) must be protected from inundation up to the Flood Planning Level. The development propose a staircase to the basement level carpark which is accessed from the Minarto Lane at 2.03m AHD refer to Drawing A1001 (Issue A) of the architectural drawings prepared by Mackenzie Architects International. This stair case should be removed or altered so that it is protected from inundation up to the FPL. Council will not accept any options that rely on electrical, mechanical or manual exclusion of the floodwaters from entering the enclosed carpark.

### **Emergency Response**

E1 - Evacuation as a means of emergency response is not supported. However, shelter in place is considered possible and would be supported by council if justified in a revised FERP. Refuge for residents can be provided above the PMF level as all apartments have a FFL above the PMF. Refuge for staff and patrons of the commercial spaces can be provided at the FPL which is 500mm above the 1% AEP level (with climate change). However, in the event of an extreme event where flood waters exceed could exceed the FPL of 4.4m AHD for a brief period, refuge can be relocated to the stairwells, corridors and communal rooftop area. This should be outlined in a revised FERP.

The proposal is therefore unsupported.

Note: Should you have any concerns with the referral comments above, please discuss these with the Responsible Officer.

### **Recommended Natural Environment Conditions:**

Nil.