

Reference: 190927

21 October 2024

Cornerstone
102b, 6 North Lakes Drive
NORTH LAKES QLD 4509

Attention: Luke Goodwin

Dear Luke,

Re: Gosford Medihub – Flood RFI Response

The Department of Planning, Housing and Infrastructure (DPHI) have provided a Request for Information (RFI) relating to flooding at the abovementioned development.

1.0 Compliance with Central Coast Council's DCP

The RFI specifically relates to the level of the lowest proposed commercial tenancy in relation to the 1% AEP flood level. The tenancy in question is located on basement 3 at RL -1.6m, whilst the 1% AEP flood level adjacent to the site is RL 10.26m (adopted from the original stormwater management report prepared by ACOR).

Despite the tenancy being located at a lower level than the flood level, it is noted that the only path for external water to enter the lower basement levels is through the driveway ramp. A review of the latest architectural drawings indicates that the driveway ramp grades up to RL 11.1m before grading back down to the lower levels of the basement.

The peak level of the driveway ramp (11.1m) is 0.84m above the external flood level and 0.34m above the sites flood planning level (FPL). Given the driveway ramp level will not allow external water into the lower basement levels, from a flooding perspective, the tenancy on basement 3 can be considered to be located above the 1% AEP flood level and FPL.

In accordance with Section 3.1.4.1 of Central Coast Council's DCP 3.1 Floodplain Management / Water Cycle Management, for a commercial development located above the FPL, flood related development controls do not apply. Accordingly, the design in its current format is compliant with Council's DCP.

It is noted that the only areas of the building lower than the FPL is a small section of the entry ramp which does not require any flood related controls.

Proposed Land use	Precinct 1 FPL to PMF	Precinct 2 Below FPL	Precinct 3 Flood Storage and Flow Paths (up to 10% AEP)	Precinct 4 High Hazard (up to 50% AEP)
1 Single Dwelling Houses		1, 9	2, 5, 7	
2 Agriculture & Recreation		2	2, 5, 7	
3 Sheds / Garages / ancillary Residential		1	2, 5, 7	
4 Commercial and Industrial Uses		2, 6		
5 Medium to High Density Residential				
6 Critical or Sensitive Facilities	3			
7 Land Subdivision	4			
8 Tourist Development				
9 Caravan parks - short-term sites		6	5, 6	
10 Permissible Earthworks		8		
Flood related development controls do not apply				
Flood related development controls apply (refer to numbered prescriptive criteria below)				
If the proposal is to be pursued further, a performance based assessment is to be provided demonstrating that the proposed development is compatible with the flooding characteristics of the site (refer to Section 3.2 and Appendix C).				

Figure 1: Extract from CCC DCP 3.1.4.1.

2.0 Latest Flood Levels

ADW Johnson has reviewed Council's flood mapping tool, and the latest floodplain management reports available on Council's website and note that the most up to date report available for this area is the 'Gosford CBD Local Overland Flow Study' prepared by Cardno. The Cardno report was utilised in the original stormwater management report to determine flood levels. Therefore, the flood levels adopted in the original report (and therefore Section 1 of this report) are the most up to date.

3.0 Flood Planning of State Environmental Planning Policy (Precincts Regional 2021)

As requested in the RFI, ADW Johnson has reviewed the abovementioned policy to confirm the projects conformance with it. The review indicates that the project is in line with the requirements of the policy. A matrix has been provided as **Appendix A** with comments against each section of the policy outlining the compliance.

4.0 Conclusion

Given the project complies with both Central Coast Council's DCP 3.1 and Flood Planning of State Environmental Planning Policy (Precincts Regional 2021), it is ADW Johnson's opinion that, from a flooding perspective, the proposed amendment should be supported.

Should you have any queries, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ben Myles'.

Ben Myles

Senior Civil Engineer

MIEAust CPENG NER

ADW Johnson Pty Ltd

RESPONSE TABLE

Clause	ADWJ Comment
<i>(1) The objectives of this section are as follows—</i>	
<i>(a) to minimise the flood risk to life and property associated with the use of land,</i>	N/A
<i>(b) to allow development on land that is compatible with the land's flood hazard, taking into account projected changes as a result of climate change,</i>	N/A
<i>(c) to avoid significant adverse impacts on flood behaviour and the environment.</i>	N/A
<i>(2) This section applies to land at or below the flood planning level.</i>	
	N/A
<i>(3) Development consent must not be granted to development on land to which this section applies unless the consent authority is satisfied that the development—</i>	
<i>(a) is compatible with the flood hazard of the land, and</i>	The development is largely located outside of the 1% AEP flood extent and is therefore compatible
<i>(b) is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and</i>	This has been addressed in the original stormwater management report. The proposed amendment is internal and does not impact upon this.
<i>(c) incorporates appropriate measures to manage risk to life from flood, and</i>	Access to levels above the PMF are available from internal lifts and stairwells, enabling easy evacuation to levels above the PMF.
<i>(d) is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and</i>	N/A
<i>(e) is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding.</i>	As flooding will not impact on the lowest tenancy in the 1% AEP event there will be no consequence of flooding.
<i>(4) A word or expression used in this section has the same meaning as it has in the Flood Risk Management Manual, unless it is otherwise defined in this section.</i>	
	N/A