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**From:** Mehran Mozaffari  
**Sent:** 11/04/2025 4:52:48 PM  
**To:** Council Northernbeaches Mailbox  
**Subject:** Objection to Demolition DA 2025/0266 - 116 Nareen Parade, North Narrabeen (Lot A DP 395600)

MR Mehran Mozaffari  
21 Eungai PL  
North Narrabeen NSW 2101  
[REDACTED]

RE: DA 2025/0266 - 116 Nareen Parade, North Narrabeen (Lot A DP 395600)

Dear Sir/Madam,

I am writing to lodge a formal objection to Development Application (DA) 2025/0266, which seeks consent for the demolition of the former registered club building and associated structures at 116 Nareen Parade, North Narrabeen. Having reviewed the proposal and supporting documents, I believe the demolition—particularly in the manner presented—risks significant adverse impacts on our local environment, community amenity, and public safety. Below, I outline the key planning grounds for my objection, with reference to relevant Council and State planning provisions.

### **1. Incompatibility with C4 Environmental Living Zone Objectives**

The site lies within a C4 Environmental Living zone, which aims to protect special ecological, scenic, and environmental values. In this context, any proposal must demonstrate how it will minimise site disturbance, conserve local biodiversity, and protect waterways. The demolition's scope and methodology, as currently detailed, raise concerns:

- **Excessive Site Disturbance & Stabilisation:** There is insufficient information on how vegetation or landform around the demolished structures will be protected or stabilised post-demolition, risking erosion or slippage.
- **Conservation Intent:** The proposal does not detail how it will uphold the conservation-oriented objectives of the C4 zone, especially regarding creek protection and sensitive vegetation.

**Request:** The applicant should provide a more rigorous demonstration of how demolition works and subsequent site management will uphold the C4 zone objectives of environmental protection and minimal disturbance.

### **2. Impacts on Waterway, Narrabeen Lagoon, and Stormwater Management**

#### **2.1 Water Quality**

A creek on or adjacent to the site ultimately feeds into Narrabeen Lagoon, a vital ecological system. Erosion, sediment runoff, and potential contamination pose a heightened threat to downstream flora, fauna, and water quality:

- **Deficient Erosion and Sediment Control Plan (ESCP):** The submitted ESCP does not adequately address stockpile locations, sediment fencing, or debris management.
- **Water Quality Monitoring:** There is no clear plan for monitoring turbidity, pH levels, or potential pollutants during demolition. Regular testing and reporting are crucial.
- **Dust Suppression & Dewatering:** There is potential for contaminated fill or materials to be mobilised by dust suppression water or rainfall. A comprehensive plan is needed for collecting

and safely disposing of wastewater, especially during demolition and any subsequent site clean-up.

## 2.2 Flood Risk

The site is known to be flood-prone, with a history of significant flood events in North Narrabeen:

- **Altered Flow Paths:** Demolition activities could unintentionally alter or block drainage lines.
- **Flood Impact Assessment:** A thorough flood risk assessment is necessary to ensure no adverse impact on upstream or downstream properties, consistent with Council's Flood Planning controls.

## 3. Geotechnical Instability, Vibration, and Noise

### 3.1 Stability Concerns

Proximity to sandstone cliffs, coupled with documented rockfalls (e.g., in 2024), necessitates a comprehensive geotechnical assessment:

- **Slopes & Retaining Structures:** Removal of trees and the existing structure may affect slope stability.
- **Monitoring:** On-site vibration monitors should be installed to detect unsafe levels of movement in both the cliff face and adjacent structures.

### 3.2 Vibration & Noise Impacts

- **Amplified Effects:** The natural acoustics in this area can intensify demolition noise, affecting nearby homes, schools, and childcare centres.
- **Equipment Limits:** Strict controls on demolition methods, equipment size, and hours of operation are essential to mitigate both noise and vibration.

## 4. Hazardous Material Management (Asbestos)

### 4.1 Proximity Risks

With residential properties and a children's play area (Tatiara Reserve) in close vicinity, the safe handling of asbestos and other hazardous materials must be paramount.

### 4.2 Incomplete Assessment

The Hazardous Materials Inspection Report reportedly has untested materials (e.g., fill), leaving open the risk of encountering unexpected asbestos or contaminated soils during demolition.

### 4.3 Management Plan

A legally compliant Asbestos Management Plan must detail:

- **Continuous Air Quality Monitoring:** Real-time particulate monitoring during all asbestos-related work.
- **Licensed Removal & Disposal:** Ensuring a fully accredited contractor supervises removal and transport.
- **Soil Testing:** Any demolition or excavation in suspect fill material should be tested and certified as safe.

## 5. Traffic Management, Parking, and Access

### 5.1 Local Road Constraints

- **Nareen Parade, Mirrool Street, and Gondola Road** have narrow bends, substandard pavements, and limited capacity for heavy vehicle traffic. The proposal must specify limitations on truck size and frequency to ensure safety.

### 5.2 Contractor Parking

- **Parking Congestion:** Requiring all contractor vehicles to remain within the site is crucial given the already constrained on-street parking. Enforcement measures should be described in the Traffic Management Plan.

### 5.3 Pedestrian Safety & Existing Access

- Eungai Place lacks footpaths, posing significant pedestrian risks. Historically, a gate and pathway at the southern end of Eungai Place offer a safe route through the site to Nareen Parade—widely used by families.
- Right of Way/Access: This existing informal pedestrian connection must be documented, protected, or replaced to maintain safe, established access during and after demolition.

## **6. Tree Removal and Biodiversity**

### **6.1 Timing & Justification**

Trees should be assessed holistically—ideally as part of a future development application—rather than preemptively removed under a demolition DA:

- Habitat Loss & Slope Stability: Removing mature trees impacts wildlife corridors (e.g., powerful owls, possums) and can exacerbate erosion or slippage risks near Tatiara Crescent and along the creek bank.

### **6.2 Qualified Arborist Evaluation**

Any proposed tree removals must be supported by a comprehensive arborist report demonstrating:

- Necessity: Why each tree must go for demolition.
- Ecological Assessment: Habitat value, ecological corridor significance, and offset or replacement planting where warranted.

## **7. Acid Sulfate Soils (ASS)**

Given the site's proximity to coastal waterways, there is potential for acid sulfate soils:

- Assessment & Mitigation: A detailed ASS management plan should be provided if excavation or sub-surface works are likely.
- Preventing Acidic Runoff: Proper handling is essential to protect the adjacent creek and Narrabeen Lagoon from acidic leachate.

## **8. Heritage Considerations**

The area around 116 Nareen Parade has a long history, possibly pre-dating its registered club use:

- Local Heritage Significance: The original usage (e.g., as farmland or a dairy) and any Aboriginal heritage should be investigated.
- Documentation: Has a Heritage Impact Statement been conducted? Failing to acknowledge potential cultural or historical value risks permanently erasing community history.

## **9. Future Use, Site Maintenance, and Survey Accuracy**

### **9.1 Lack of Clarity on Future Development**

Without clear plans for site redevelopment, it is difficult to assess if early demolition is warranted or consistent with the final land use.

### **9.2 Post-Demolition Maintenance**

Abandoned or unsecured sites can become derelict, posing safety hazards and environmental risks (e.g., illegal dumping, weed growth).

### **9.3 Survey Deficiencies**

The submitted site survey omits critical details, such as:

- Full Creek Line and drainage infrastructure
- Public footpath or access easements
- Nearby play areas (Tatiara Reserve)
- Electrical substation

An accurate and updated survey is foundational for Council's proper assessment of the site constraints.

## **10. Working Hours**

I reiterate the request that, should the Council ultimately grant demolition approval, strict working hours (e.g., 8:00 am–4:00 pm, Monday to Friday) be enforced, minimising disruption to local residents.

## **Conclusion and Request**

In light of the above issues—encompassing environmental protection, flood risk, hazardous materials, traffic and pedestrian safety, heritage values, and site survey accuracy—I strongly recommend that:

1. Northern Beaches Council refuse DA 2025/0266 due to the significant unresolved concerns and deficiencies in the application's supporting documentation.
2. If Council were to consider approval despite these concerns, it must impose stringent conditions ensuring:
  - Proper erosion and sediment controls with active water-quality monitoring
  - Comprehensive geotechnical oversight and vibration monitoring
  - Strict asbestos management protocols
  - Preservation of safe pedestrian access routes
  - Protective measures for existing trees and habitat
  - Thorough flood risk and acid sulfate soil mitigation

Thank you for considering this submission. The environment, community safety, and local amenity of North Narrabeen warrant careful scrutiny of proposals in such a sensitive C4 Environmental Living zone. I trust Council will conduct a thorough assessment and uphold the community's interest in preserving the unique natural and social fabric of this area.

I look forward to your response.  
Yours faithfully,

Mehran Mozaffari

