
From: [REDACTED]
Sent: 11/02/2025 7:47:03 AM
To: Council Northernbeaches Mailbox; [REDACTED]
Subject: TRIMMED: Submission on DA2025/0008 62-64 Powderworks Road and 32 Bellara Avenue North Narrabeen
Attachments: FINAL Submission on Northern Beaches DA2025 008 62 and 64 P'works Road and 32 Bellara Avenue North Narrabeen Febuary 2025.pdf;

Attention Thomas Prosser

To Whom it May Concern

Please find attached my submission on DA2025/0008 for 62-64 Powderworks Road and 32 Bellara Avenue North Narrabeen.

Could you acknowledge receipt of this submission via email.

Yours sincerely,

Lindsey Dey

Email sent using Optus Webmail

**Submission on DA 2024/0008 62 and 64 Powderworks Road and 32 Bellara Avenue
North Narrabeen
10 February 2025**

In this objection submission reference is made to Development Application (DA2005/0008) at 62 and 64 Powderworks Road, as well as 32 Bellara Avenue, in North Narrabeen. The Powderworks Road lots have a combined area of 2790 sqm (SEEp.5).

The DA states that the proposed development includes the subdivision of 2 lots into 3 and the construction of a new 5 plus bedroom dwelling house on future Lot 2 as well as access driveway and services, including a stormwater management system. The proposed development also includes the provision of infrastructure and services and a driveway access to proposed Lot 2 via a right of carriageway over the adjacent property to the immediate west at 32 Bellara Avenue. Photo 1 ahead depicts the existing access to 32 Bellara Avenue, looking northeast towards proposed lot 2.





Photo 2 depicts the head of the cul de sac at Bellara Avenue with a 3 plus metre high retaining wall in the mid ground and covered but unsealed deeper excavation behind the wall. The photo is looking north across 32 Bellara Avenue towards the boundary with proposed lot 2.

The DA documentation states that the existing 2 dwellings on proposed lots 1 and 3 are to be retained. This differs from Council's web site (accessed 21 January 2025) that indicates that DA2024/1379 for demolition and construction of a new house and ancillary facilities was approved on 16 January 2025. The approved dwelling house is located at the Powderworks Road (northern) end of current no.62 Powderworks Road.

Council's web site also indicates that DA2025/0044 has been recently lodged for a dwelling house and ancillary facilities at 32 Bellara Avenue. Note: The status of the latter mentioned DA on Council's web site states "more information required".

Proposed Building footprint and associated infrastructure placement on the site

Most of the grounds for objecting to this DA result from the applicant's choice to site the proposed building, retaining walls, driveway access and ancillary services on the steep, heavily treed, southern section of the overall site.

No consideration of alternative building footprints/ platforms has been included in the DA. A previous Survey submitted as part of the DA indicates a *building platform* towards the northern, more level part of the site where there may be opportunity to materially reduce vegetation clearing and earthworks.

A dwelling house at this location would far better meet the requirements of Pittwater LEP 2014 and Pittwater DCP 21 (DCP), including sections A4.11 and D.11 North Narrabeen Locality *to remain 2 storey, landscaped, integrated with landform and landscape... building height below tree canopy, native tree canopy retained, to retain and enhance wildlife corridors...*

There are alternative locations that would have minimal environmental impact on the site and its surrounds.

Tree Loss

Although the land surface has been disturbed on the site (and now includes invasive species such as lantana) that part of the site where development is proposed is heavily vegetated with *significant* tree species (Biodiversity Conservation Act 2016). Further, the area has been included in Council's Biodiversity Value Map, is also a Category 2 Land and Wildlife Corridor (DCP 4.4 Flora and Fauna Habitat Enhancement) and is within the Scenic Protection Area (pers comms Council officer).

The Arboricultural Impact Assessment Report prepared by Joanne Willis states that **61** trees will be impacted i.e. 51 on the site and 10 on adjoining land. 6 of these trees have high conservation value, 27 have moderate value and 28 have low value. A total of 13 protected trees will be removed for the building footprint, terrace and retaining walls, and an additional 3 for the driveway. At least 2 additional trees have the potential to be damaged or destroyed as a result of the proposed development. This is not *no removal of significant vegetation* as stated on p.32 of the SEE that forms part of the DA.

No required 7 Part Test or Tree Protection Plan under DCP B4.2.2 has been submitted as part of the DA.

The proposed development does not comply with the DCP (including C1.1. and C1.2) in relation to retention/ enhancement of tree canopy and specific replacement tree planting requirements.

The DA provides for the replanting of only **14** trees and minimal small-scale planting adjacent to the proposed house. This is an inadequate landscaping response to the proposed development (loss of 61 trees). It is noted that Council's Landscape section does not support the proposed development because of the proposed tree removal and has referred it on to Council's Bushland and Biodiversity section for input (end January 2025).

It is not known whether the proposed stormwater management system approximately 4-5 metres from the boundary with properties in Nareen Parade could further damage or destroy trees. At least 1 tree in this area is proposed to be removed.

The actual and potential tree loss as a result of the proposed development is of major concern to my clients.

Ecological value

The Biodiversity Development Assessment Report (BDAR) prepared by East Coast Ecology states that the area consists of Sydney Coastal Enriched Sandstone Forest. Only 13% of the site has remaining native vegetation cover. The report states that the site has a highly disturbed understorey and little

or no groundcover. However, the endangered Swift Parrot is present on the site, and if the development proceeds the report recommends that there will be a requirement for *2 credits to be applied*. This has not been addressed in the SEE.

Proposed dwelling house

The proposed dwelling house does little to enhance the site from an aesthetic or design perspective. There is no sense of entry or *arrival* at the proposed dwelling house. The amenity of future residents living in the proposed dwelling in regard to light and ventilation is questionable, particularly on the lower levels, given the extent of deep excavation and the overall proposed dwelling's southern exposure.

There is an excessive amount of excavation proposed (approximately 5.2 metres (Source: Geotech Report)) to minimise its bulk and scale. There is little architectural interest proposed in terms of fenestration or articulation. The proposed house does not meet the intent of the side boundary envelope requirements of the DCP (D11.9). The Council preferred lightweight construction with pier and beam footings in environmentally sensitive areas has not been employed in this instance (DCP D11.14).

The steep slope of the site will enhance the bulk and scale of the proposed dwelling which is at the maximum height of 8.5 metres when viewed from adjoining properties to the south. The southern wall, together with significant retaining wall structures (not detailed in elevation or section plans), is non-compliant as they are all within the 6.5 metre rear boundary setback minimum (DCP D11.7).

No planting along the southern boundary is proposed, or likely to ever be viable, given the steep slope, proximity to the proposed development, sunlight deficient microenvironment and proposed stormwater management system in this area. No detail of surface treatment to protect the site and its surrounds is provided in the DA.

A minimum area of 80 sqm of Private Open Space (POS) is required to be provided (DCP 1.7). The DA provides all POS in the form of 2 first floor decks. There is no POS at ground level. This is largely because of the extent of cut into the site for the proposed dwelling house. As a result, future residents will not have direct access to any garden in what is identified by Council as a significant natural environment. In this regard the proposed development does not meet the objectives of the prevailing zone of the DCP (including section 1.7).

The width of the garage does not meet Council's minimum standard of 6 metres.

The overshadowing diagrams appear inaccurate and lessen the impact of the proposed development. It is requested that sunlight diagrams based on the winter solstice be prepared and submitted to Council for assessment by a Registered Architect (DCP C1.4).

The proposed design does not embrace the outstanding scenic locality, nor meet the Pittwater LEP 2014 overall Aims or C4 Zone-specific objectives

There will be a significant loss of residential amenity for the adjacent property owners immediately south at no.80 Nareen Parade in terms of loss of privacy, overlooking, bulk, scale and light spill (DCP C1.5). There will be no buffer to properties south of the site and the visual impact re bulk and scale

will be significant. Any future dwelling approved needs to have south elevation windows with a sill height of 1.5 metres and/or translucent to protect neighbour privacy.

Landslip

Concern is expressed about both the construction and completion phases of the proposed development and the risk of landslip for my clients, particularly in relation to the impact of climate change and rainfall events. Ahead is a link to a newspaper article regarding an incident in the locality of Nareen Parade.

[Police keep watch on house set to fall imminently during Sydney storms | Daily Telegraph](#)

Landscaping

Proposed landscaping of the site is minimal and confined to the perimeter of the new dwelling house. No under and mid storey planting with appropriate species is proposed. There is no Landscape and Vegetation Management Plan provided and no details of how the required 60% of the site will be landscaped (DCP D11.11). The DA indicates no removal and ongoing management of lantana and other invasive species that dominate most of the existing site at ground level (DCP C1.1).

The proposed development is not compliant with DCP D11.6 where vegetation is to be retained and enhanced to visually reduce built form.

The proposed lack of landscaping information will potentially increase the risk of landslip within and without the site during and following construction of the dwelling house and ancillary facilities.

Sustainability

No sustainability measures are included in the DA, particularly regarding the reuse and recycling of stormwater, grey water etc as appropriate. This does not comply with the aims and objectives of the LEP.

Ridgeline view impacts

If approved the DA would result in the loss of significant, substantial native trees on the steepest and most heavily vegetated part of the site. The resultant “scar” would be highly visible and disrupt views to the existing, heavily vegetated ridgeline from parts of North Narrabeen and Elanora Heights, as well as the public domain of Nareen Park.

This would also be a cumulative view impact from the existing, substantial driveway entrance and associated works at no.32 Bellara Avenue that has resulted in significant tree loss and erosion. See Photos 1 and 2 earlier.

The proposed development does not meet the intent and requirements of DCP C1.2, overall D.11 (particularly 11.2) and D11.15.

Subdivision

Although the subdivision meets the numeric minimum lot size requirements it does not comply with the LEP Lot Size provision objectives. *The resulting lots are not consistent with the desired character of the locality, or the pattern, size and configuration of existing lots in the locality.* See Image 1 extracted from the SEE that provides surrounding lot details. The proposed lots are significantly smaller than those to the east and south. The earlier subdivision pattern is likely to have reflected the natural quality and steepness of the locality, as well as a response to hazards including land slip.



The proposed building which will be the result of the proposed subdivision will *diminish* existing residential amenity on neighbouring properties and those who view the ridgeline. The risk of hazards such as landslip over the site and adjacent properties to the south will potentially increase, and the quality of the natural environment will decrease (DCP B2.2).

Construction

The DA includes an excessive amount of excavation which is not compliant with the intent or requirements of the DCP (including D11.14). There is no consideration of minimising the impact of the building footprint of an environmentally sensitive site and locality. As previously stated there will be an increased risk of landslip on and in the vicinity of the site.

No Construction Management Plan has been submitted with the DA which is considered critical for this site and adjacent properties. There would have to be significant safety fencing constructed in the vicinity of my clients during the construction phase if this DA was approved (DCP 8.4).

The DA does not include adequate driveway access details, including sections and the extent of cut and fill across 32 Bellara Avenue and proposed lot 2.

Other DA Concerns

The following includes additional concerns:

1. No analysis of visual impact as required by Council.
2. No comprehensive details i.e. species, size, location, minimum 5 metres from all built structures etc of the replacement trees has been provided in the DA.
3. The DA documentation states that the proposed dwelling house in a modest 2 storey 4 bedroom. It is in fact 3 storeys and 5 plus bedrooms. Hence, the Waste Management Plan and BASIX Certificate are out of date and inaccurate.
4. The proposed dwelling house will not be *below tree canopy* as required by Council because the tree canopy will be largely removed.
5. Proposed Lot 2 will rely on infrastructure works for stormwater disposal via the inter allotment drainage system. Although required, the DA does not include the owner/s of 32 Bellara Avenue's written consent for this to occur.
6. No drainage line details are provided.

Conclusion

Largely because of its location on proposed lot 2 the DA does not meet the overall Pittwater LEP 2014 Aims. It does not *promote environmental and social sustainability*. It is not *consistent with the desired character of the locality, nor is it housing in an appropriate location*. It does not *protect or enhance Pittwater's natural environment*. The DA does not *minimise risks to the community in areas subject to environmental hazards and climate change*.

Further, the proposed development does not meet the C4 Environmental Living zone objectives. It is not a *low-impact residential development* and is within *an area with special ecological, scientific or aesthetic values*. The proposed development will have an adverse impact on those values.

The proposed development is not *integrated with the landform and landscape*, nor does it *retain and enhance the existing wildlife corridor*.

There will be a significant loss of residential amenity for the adjacent property owners immediately south at no.80 Nareen Parade in terms of loss of privacy, overlooking, bulk, scale and light spill (DCP C1.5).

Please contact me should you require clarification of any matter raised in this submission. My clients and I request that we be kept informed of progress with the DA and be given the opportunity to make a further submission on any amended proposals.

Yours sincerely,

Lindsey Dey
Principal
Lindsey Dey Planning



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E: [Redacted]

W: www.lindseydeyplanning.com.au