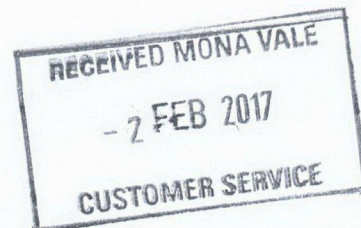


**Warriewood
Residents
Association**
INC 9896003



Warriewood Residents Association Incorporated
25 Utingu Place
BAYVIEW NSW 2104

30 January 2017

General Manager
Northern Beaches Council
PO Box 882
MONA VALE 1660

Draft Planning Proposal for 6 Jacksons Road, 10 and 12 Boondah Road Warriewood: No PP0005/16

Dear Sir

We wish to make a submission on the Draft Planning Proposal No PP0005/16.

The Warriewood Residents Association (WRA) has studied the application and the attached documentation.

Summary

The WRA supports the former Pittwater Councils' decision to designate the sites be reserved for council open space for the following reasons.

1. The increase in the population of the Warriewood Valley requires additional recreation space.
2. The land is generally flat and therefore suitable for playing fields.
3. The land has minimal site improvements that preclude its purchase.
4. The land is close to other facilities and recreation assets.
5. There are known problems with flooding and proximity to bushfire zones.
6. The decision to limit the sites use was supported by the community.
7. WRA does not support spot rezoning following the Warriewood Strategic Review.

Reasons

The Warriewood Valley Strategic Review did not consider these sites. However, the Warriewood Valley Strategic Review Addendum Report 2014 was developed and considered by the community and the elected council and with the aid of many reports and feedback from owners and residents agreed to a set of rules appropriate for this site.

This application sets out to amend the following controls.

1. Land use zoning
2. Height of the buildings for two zonings
3. Change the Floor Space Ratio

The WRA wish to highlight some of the features relating to the sites that we understand should be considered when evaluating the draft planning proposal.

Changes to the current land use zoning

We will only address the issue of changing the land use as this is the crux of the matter with changes to the height and FSR controls only applicable if the land use is changed. The WRA has consistently opposed one-off spot rezoning in the Warriewood Valley.

The council did concede, in 2014, that there was a SMALL area of the combined sites at the far north of the area that was suitable for development, if a sufficient case were presented to Council. It was in 17 November 2014 that the strategic Review was amended as the Warriewood Valley Strategic Review Addendum Report 2014. The following extracts are from that report and unless there has been a significant change in the flood and land use potential for these sites these conclusions from the elected council must still stand.

4.4 Southern Buffer and Sectors 172, 173 and 174

The 2012 Strategic Review investigated development opportunities for the Southern Buffer (including Sectors 172, 173 and 174) however due to the significant environmental constraints and divergent landowner expectations, no future land use was recommended for this area. The 2012 Strategic Review invited landowners, either individually or collectively, to pursue development opportunities for their lands through the lodgment of a Planning Proposal addressing, as a minimum, the constraints Identified during the 2012 Strategic Review. The 2012 Strategic Review identified flooding as a major constraint to any future development. The majorities of the properties within the Southern Buffer are low lying and are inundated during flood events. Flood depths reach approximately 1-2 metres above natural ground level across most of the Southern Buffer and flood events are typically long in duration and influenced by backwater flooding from the Warriewood Wetlands and Narrabeen Lagoon. These findings were reiterated in the Narrabeen Lagoon Flood Study 2013.

All the sites in this proposal are flood affected. There is a small area rated B (Land affected by PMF flood level only) at the northern extremity and the remaining area rated C (Land affected by 1% AEP flood level).

It appears from the submission that the strategy to be adopted is one of water storage and allowing undercroft inundation. "site can be developed with increase in temporary flood storage through use of the revised cut/fill and under croft area" We do not see how this overcomes the conclusions of the Warriewood Valley Strategic Review Study 2011. Part of the 2011 report is attached below, and this set out land uses recommendations for the various areas in the Warriewood Valley.

4.4.1 Warriewood Valley Strategic Review Hydrology Study 2011

The Warriewood Valley Strategic Review Hydrology Study 2011 (2011 Hydrology study) undertaken for the 2012 Strategic Review classified land into developable land categories (based on criteria set out in the 2011 Hydrology Study) and recommended land uses for each category. The recommended land uses for each category are as follows:

- Category A: “No aged care facilities, retirement villages, educational establishments, child care centres and other essential services,”*
- Category B: “Most land uses are permitted... assuming that they comply with relevant policies on floor levels and other constraints.”*
- Category D: “Most land uses are permitted... assuming that they comply with relevant policies on floor levels and other constraints.”*
- Category F: “Sporting fields and recreational areas are the only land use recommended.”*
- Category G: “Commercial and industrial land uses recommended.”*
- Note: No areas within the Release Area are classified Category C or E. In relation to the Southern Buffer, the Study classified:*
- Northern section as part Category B and part Category D.*
- Southern section (at junction of Jacksons Road and Pittwater Road) as Category G.*
- Remaining lands (being 2, 4 and 6 Jacksons Road; 1, 2, 2A, 3, 4A, 6, 8 and 10 Boondah Road; and Sectors 172, 173 and 174) as Category F.*

This Study, in considering potential development opportunities, recommended the creation of two developable islands at the highest points within the sector.

This was to be achieved through significant excavation and filling in parts of the sector. Under this scenario, the central areas of the Southern Buffer were WARRIEWOOD VALLEY STRATEGIC REVIEW ADDENDUM REPORT RESULTS 37 determined suitable for open space only due to flood depths and flow path requirements.

We note in this case that the construction of the apartments and road along Boondah has altered the overland flow and this may exacerbate the flood profile of the sites. The maps included in the submission appear to be prior to the completion of the apartments. Therefore, if there is a change in the landform within the subject area as a result of development then it stands to reason that the downstream water flow will be altered and the most likely impact will be on Warriewood Square and the playing fields south of Jacksons Road.

4.4.2 Recent review following adoption of the Narrabeen Lagoon Flood Study 2013

Due to revised flood modeling under the Narrabeen Lagoon Flood Study 2013, Cardno was commissioned to review the flood behavior in the Southern Buffer area and have regard to the recommendations made for these lands under the 2011 Hydrology Study. The review identified that the floor levels required for development would increase from the 2011 Hydrology Study. In addition the evacuation potential would not be improved. The review also confirmed that the majority of the Southern Buffer land continues to be classified as Category F consistent with the recommendations of the 2011

Hydrology Study.

It reaffirmed the land uses recommended for Category F classification is sporting fields and recreational areas only.

It is this recommendation that was adopted for this area of land.

4.4.3 Review of existing Council policies and studies

Council, in considering the recommendations of the 2012 Strategic Review, was advised there were additional infrastructure requirements commensurate with the additional demand as a result of the increased development. At that time, it was identified that up to 5 hectares of additional recreational area was required to be purchased.

Pittwater Council took action to comply with the requirement for additional recreation area, and decided, because of its unsuitability for building, and proximity to other sports fields, the Southern Buffer should be designated for open space.

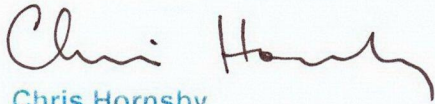
These sites were part of a recent planning proposal that was to be a large mixed-use development. This application was refused based on the known planning conditions and supplemented by the sites relationship to the bushfire, overland water flow, and planning needs to have extended playing fields as part of the Warriewood Valley Development. Pittwater Council commissioned Don Fox Planning to undertake an assessment of the previous Planning Proposal and this should also be considered by the authority given charge of reviewing this application.

The WRA also notes that the whole western boundary of the sites is designated as Bushfire Flame Zone and the whole site is Bushfire buffer. While this can be ameliorated, this is not a desirable situation, for many land uses, when the decision to change the land use involves agreeing to a risk, not there if the land is used as open space.

The developers should be encouraged to explore with council innovative land use solutions for the land so that the uses for the various parcels of land meet the planning controls agreed to by the community, Pittwater Council and Department of Planning.

To restate our position regarding development on this site, the WRA supported the outcome of the Strategic Review and has maintained the position that all development should be controlled by the 2014 Warriewood Valley Strategic Review Addendum Report.

Yours faithfully,

A handwritten signature in dark ink, appearing to read "Chris Hornsby". The signature is fluid and cursive, with the first name "Chris" being more prominent than the last name "Hornsby".

Chris Hornsby
President WRA

Copies WRA, NBC Administrator, Mr Stokes