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10/04/2025

MR Michael Page
24 Eungai Place PL
North Narrabeen NSW 2101
[REDACTED]

RE: DA2025/0266 - 116 Nareen Parade NORTH NARRABEEN NSW 2101

Mr. M Page and Dr. C Harvey
24 Eungai Place
North Narrabeen, NSW, 2101

10 April 2025

Attn: Mr. Thomas Burns
725 Pittwater Road
Dee Why NSW 2099

Dear Thomas Burns (Assessment Officer),
Re - 116 Nareen Parade, North Narrabeen DA2025/0266 - Demolition of Registered Club and associated Structures
Below are our concerns with the proposed demolition works:

1. Safe pedestrian access from Eungai Place to Nareen Parade.

The absence of a footpath on Eungai Place combined with the steep gradient and blind corner at the intersection of Eungai Place and Tatiara Crescent, result in no safe pedestrian passage from Eungai Place to Tatiara Crescent and beyond (and therefore busses, shops and other public amenities).

The gate to 116 Nareen Parade and associated footpath from the Southern end of Eungai Place has long served as the only accessible path for pedestrians from Eungai Place to Nareen Parade. Deposited Plan 237442 references a right of way in this area. This is a source of concern for number of local residents, including young families with prams, who rely on this route as safe pedestrian access to amenities including the local primary school.

It is noted that the survey plan does not show the existing gate from the southern end of Eungai Place to the site, nor does it provide sufficient detail of the public footpath within Lot 26 which leads to this gate.

Please confirm how this right of access (either through 116 Nareen Parade or via the public domain to the rear of the club building) will be maintained during the works.

2. Asbestos and Lead Management

Given the proximity of the site to residential dwellings, many of which are home to young

families, as well as the presence of a children's play park directly adjacent to the site (not labeled on the survey plan) there is considerable community concern regarding the disturbance and safe removal of the large volume of asbestos (friable and non-friable) from the site.

The Pre-Demolition Hazardous Materials Inspection Report notes that a total of 8 potentially contaminated building elements were not tested for hazardous materials. Including below ground fill material, which would be left exposed to the elements on completion of the demolition works.

I would expect to see a sectional drawing showing the proposed levels to which demolition will extend.

Further detailed information regarding hazardous waste removal would be welcomed, including what safeguards would be implemented to ensure neighboring residents are not placed at risk (expect this would include continuous air monitoring during works, and potential supervision from SafeWork NSW).

Given future plans for the site are unknown and are likely to be subject to a lengthy review process, what remediation work will be undertaken following the demolition to ensure the underlying material is not subject to erosion?

3. Environmental Concerns

a. Erosion and Sediment Control Plan appears to lack the following measures:

- i. Containment silt fence in the immediate vicinity of the proposed stockpile areas (some of which are positioned immediately adjacent to a stormwater pit)
- ii. No consideration for control of demolition waste entering the stormwater system via the pits contained within the demolition works area, and Lot 26 Eungai Pl. Will these entry points to the stormwater system be capped as part of the demolition works? If so, has the effect of their removal from the drainage system been modeled? (Pit locations are shown on the survey plan, but omitted from the erosion and sediment control plan, no service location data has been provided for conduits connecting these pits).
- iii. Given the stormwater pits on and adjacent to the site drain directly into Narrabeen Lagoon, home to regionally significant Eustruarine Reedland, Salt Marsh and Mangroves as well as Aquatic Fauna, what water quality monitoring will be implemented to ensure the demolition works do not negatively impact this significant feature of our local environment?

b. Dewatering Plan

- i. A considerable volume of water would be required for the safe demolition of the structure noting the extensive contamination profile. Dust suppression and wet cutting would be required on a daily basis. How does the demolition contractor propose to decontaminate this water and remove it from site? I would expect to see a detailed dewatering plan which accounts for the volume of dust suppression water, wet cutting slurry, and provisions for flooding given the low-lying nature of the site.
- ii. Noting the flood prone nature of the site, I would expect to see the safeguards in place which would prevent hazardous substances from entering the stormwater system in during a flood event.

c. Tree Removal

- i. The removal of trees, unless absolutely necessary to the demolition works, should only be

considered with a future DA for a subdivision of the land.

4. Heritage

Please provide further details of the council's heritage review, as it is widely reported that parts of the structure pre date the inception of the RSL club.

5. Incomplete Documentation

A number of key features are not available on the survey plan:

- Appropriate detail of the existing water course
- Drainage and right of way easements
- Complete detail of adjoining footpath from Eungai Place
- Consideration of public right of way
- Tatiara Reserve play park bordering the site

6. Geotechnical Investigations

The site is at the base of a natural 'amphitheater' of sandstone cliffs, with evidence of loose rock and a history of significant rock falls (as recently as 2024). Can the council please confirm that suitable restrictions will be placed on the size of demolition plant equipment to be employed for the proposed works, and monitoring devices installed at appropriate locations to ensure vibration from the works does not negatively impact the neighboring properties or the stability of the surround cliffs?

It appears that parts of the existing structure may serve to retain the ground to the South. Will a geotechnical investigation be conducted prior to the demolition to determine if there is risk of subsidence following demolition of the structure?

7. Contractor Compound and Parking

On street parking is an ever-increasing issue in the streets surrounding the site, with many streets reduced to one way traffic in places due to the volume of parked vehicles. Can the Council please confirm that contractor parking will be limited to the confines of the site, and detail how this will be enforced.

8. Traffic

Given the nature of the adjoining road network, condition of roads, and known congestion at the nearest access point to Pittwater Road, is it appropriate the TGS only extends for 100m either side of the site? Has consideration been given to limiting the size of trucks permitted for the works? Suggest that anything larger than a Bogie Tipper would be inappropriate for the corner intersection of Nareen Parade and Mirrool Street or Rickard Road - Anana Road intersection. Will restrictions be placed on the allowable route which trucks can use? For example, Gondola Road access point to Pittwater Road would be inappropriate for multiple large vehicle movements.

9. Working Time

Demolition works to be restricted to Monday to Friday 0800 - 1600.

Yours sincerely,

Mr. M Page and Dr. C Harvey