Sent: 9/02/2020 12:08:00 AM

Subject: DA2019/1340

Attachments: DA2019-1340 Meatworks OxFalls FoNLC 20200208.doc;

Submission attached.

Friends of Narrabeen Lagoon Catchment



P.O. Box 845, Narrabeen NSW 2101

8th February 2020

To: The CEO Northern Beaches Council Civic Centre, 725 Pittwater Road Dee Why NSW 2099

DA2019/1340

100 / 0 Meatworks Avenue OXFORD FALLS NSW 2100

Alterations and additions to the existing premises

We wish to object to the proposed development for the following reasons:

PROPOSAL

The application proposes the expansion of the previously approved light industrial/warehouse development with ancillary office space.

The application seeks the construction of an additional 16 industrial/ warehouse units with ancillary office space and associated basement parking of which 3 have larger single level floor plates. A large roof top communal open space is also proposed.

OBJECTIONS

The approved development was for 30 industrial units housed in seven buildings.

The proposal is for an additional 16 units, which a significant increase.

WLEP2000

DESIRED FUTURE CHARACTER (DFC)

The proposal is not consistent with the following clauses in the DFC.

Future development will be limited to...low intensity, low impact uses.

The natural landscape including landforms and vegetation will be protected and, where possible, enhanced.

Development in the locality will not create siltation or pollution of Narrabeen Lagoon and its catchment and will ensure that ecological values of natural watercourses are maintained.

The development is not a low intensity, low impact use.

The proposal will result in landform impacts and excavation; vegetation will be removed for development and APZ.

The development will not maintain the ecological values of natural watercourses.

GENERAL PRINCIPLES

The proposal is not consistent with the following General Principles

Clause 52 - Development near parks, bushland reserves and other public open spaces

The adjoining bushland reserve "may be threatened by a number of direct and indirect processes, including the erosion of soils, the siltation of streams and waterways and the spread of weeds and exotic plants within the bushland".

Clause 56 - Retaining distinctive environmental features on sites

The development does not retain distinctive environmental features of its site, such as rock outcrops and remnant bushland.

Clause 58 - Protection of existing flora

The development is not sited and designed to minimise the impact on remnant indigenous flora, including understorey vegetation.

Clause 60 - Watercourses and aquatic habitat

The development is not sited and designed to maintain and enhance natural watercourses and aquatic habitat.

Clause 63 - Landscaped open space

The development will reduce the landscaped open space available for the establishment of appropriate plantings, to facilitate water management and conserve significant features of the site.

Clause 66 - Building bulk

The proposed building would visually dominate surrounding spaces and be highly visible from a wide area, including public land, within Narrabeen Lagoon Catchment.

Clause 82 - Development in the vicinity of heritage items

A heritage conservation area is to the northwest of the site. The development would adversely affect the setting and scenic views from the heritage conservation area.

CATEGORY 3 USE

The proposed industrial/ warehouse and ancillary development is a Category 3 land use in the B2 Oxford Falls Valley Locality. The proposed alterations and additions would result in a significant increase in development and intensity of land use.

DEVELOPMENT STANDARDS

Building height

Buildings are not to exceed 8.5 metres in height, where height is the distance measured vertically between the topmost point of the building and the natural ground level below.

Buildings are not to exceed 7.2 metres from natural ground level to the underside of the ceiling on the uppermost floor of the building.

The proposed industrial/ warehouse building exceeds both height controls.

Rear and side building setback

The minimum rear and side building setback is 10 metres.

The proposed building has a 7.5 metre setback to the western boundary.

FLORA

The development will result in the complete clearance of 0.10ha of Red Bloodwood – Scribbly Gum heathy woodland. An APZ is required around the southern margin of the development. A total of 0.31 ha will also be impacted to accommodate the proposed APZ.

EP&A ACT 1979 - Evaluation

- The development will have adverse impacts on the natural environment.
- The location of the site in the non-urban Oxford Falls Valley locality is not suitable for the proposed expansion of Category 3 development.

PREVIOUS APPROVED DEVELOPMENT

The previous development was approved on the proviso that "existing natural bushland to the south and south east of the site will not be affected by the proposal". The current proposal reneges on this commitment, together with related constraints and conditions, which were integral to the approval.

[Attached are extracts are from the Statement of Environmental Effects (SEE) for the previous approved development in 2013.]

All of the environmental aspects, including stormwater runoff, would be adversely affected by the current proposal to expand the Category 3 development.

In our view the proposed alterations and additions are not consistent with the requirements of the Warringah LEP 2000 and should be rejected.

Yours sincerely,

Ron Patton, President

EXTRACTS from SEE for the previous approved development in 2013

The subject site is located within the B2 – Oxford Falls Valley Locality under the Warringah Local Environmental Plan 2000. Immediately to the northwest of the site is Public Open Space which is also located within the B2 Locality and is an identified Conservation Area.

The existing natural bushland to the south and south east of the site will not be affected by the proposal.

It is acknowledged that the vegetated south-eastern portions do provide suitable and in some cases provide optimal habitat for a number of threatened species.

The remnant areas of vegetation on the south-eastern portions will remain untouched and provide undisturbed habitat for threatened flora and fauna species.

The site does adjoin a drainage channel/watercourse which runs in a south to north direction to the east of the site. Stormwater from the proposed development is to be disposed of to this watercourse.

WLEP 2000

Clause 56 - Retaining unique environmental features on site

The vegetated south-eastern portions will be provided with a natural buffer from the proposed development along the southern aspects due to an existing escarpment.

Clause 58 - Protection of existing flora

The proposal will not result in the removal of any remnant vegetation which exists upon the site.

Clause 61 - Views

The proposal seeks to retThe subject site is located within the B2 – Oxford Falls Valley Locality under the

Warringah Local Environmental Plan 2000. ain all existing bushland.

Clause 63 - Landscaped open space

This clause aims to ensure that development provides landscaped open space that is of sufficient dimension to accommodate appropriate plantings, an outdoor recreation and services area and facilitate water management.

Clause 76 – Management of stormwater

A Stormwater Drainage Plan has been prepared which provides for all collected stormwater from the building to discharge to a detention basin/pond with a volume of 1024.0m2 with overflows being directed to the existing watercourse adjacent to the northeast portion of the site.

Locality Statement B2 - Oxford Falls

It is considered that the proposal is consistent with the relevant desired future character statement of the B2 Locality for the following reasons:

The proposal has no impact on the existing natural landscape to the north and south of the site. The proposed works are located in the previously levelled and cleared portions of the site and as such do not require the