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**Sent:** 23/11/2018 9:48:45 PM  
**Subject:** DA2018/1692 Boarking House 74 Willandra Road  
**Attachments:** 74 Willandra Rd boarding house submission Nov 18.docx;

Alex Keller  
DA2018/1692  
28 room boarding house  
74 Willandra Road Narraweena  
Attached is a submission from Friends of Narrabeen Lagoon Catchment

Regards Ron Patton  
Vice President Friends of Narrabeen Lagoon catchment

Friends of  
Narrabeen Lagoon  
Catchment

P.O. Box 845, Narrabeen NSW 2101



24 November 2018

The Chief Executive Officer  
Northern Beaches Council

Attention: Alex Keller

**DA2018/1692**  
**28 Rooms boarding House**  
**74 Willandra Road Narrabeena**  
**Lot 810 DP752038**

Dear Sir,

We submit this objection to this application for a 28 room boarding House.

Our community organisation has 1,500 members and supporters who are extremely concerned about the destruction of bushland in the Narrabeen Lagoon Catchment caused by these types of intense urban developments that are intruding into the non urban areas of this sensitive catchment area.

This site is in Locality B2 Oxford Falls Valley LEP2000 which is part of the 'deferred areas' in LEP2011.

This area is subject to further investigations by the Council and the Department of Planning. Further the Council with the agreement of the Department of Planning has determined that the current population targets for the Northern beaches Council area can be achieved within the existing urban areas and do not rely on the release of any non urban land.

The application relies on the State Environmental Planning Policy for Affordable Rental Housing as well as Locality B2 Oxford Falls Valley LEP2000.

This lot is not within a zoning contained in the SEPP (ARH) and should not be used in the application or the assessment.

The non urban B2 Oxford Falls Valley Locality is not equivalent to any of the urban land zones to which the SEPP applies.

Further the exhibited draft land use zone for the site is E3 Environmental Management, which would have the effect of prohibiting a boarding house.

This means that this area is not considered suitable for a boarding house, particularly a high density boarding house.

This application is for a very high residential density development in a low density neighbourhood. The proposal is a very large bulky building that is not compatible with the the planning controls in LEP2000 and will cause detrimental effects on the natural environment and the waterway near the proposed development.

**WLEP2000****Locality B2 Oxford Falls Valley****Desired Future character:**

This application is inconsistent with the DFC statement.

This type of development will dramatically change the character of the Locality.

The development is not a detached style dwelling; the proposal contains 28 self contained rooms. The Land and Environment Court has previously determined that each room in a boarding house is a separate dwelling.

The large bulky building and the associated on site facilities, together with the activities of many residents and visitors will not protect the natural landforms and vegetation on this

The proposal does not show that there will adequate control of pollution entering the waterways to Narrabeen Lagoon and does not show that it will ensure that ecological values of the natural watercourse will be maintained.

**Category 2:**

This proposal is a category 2 use as it is not listed in category 1 or 3 in LEP2000 for Locality B2. Category 2 uses may be consistent with the DFC statement; therefore it is essential that the application shows how this proposal is consistent with the DFC Statement.

**In our view this application is not consistent with the DFC Statement; the application should be refused.**

**Density Control:**

The lot size is 2.85ha which is significantly less than the required minimum of 20ha for a single dwelling.

The application contains 28 dwellings which is equivalent to 196 dwellings on 20 ha. This would be a variation of 19,500% to the control in the LEP which is unacceptable.

The application states that the subject and the adjoining vacant lot were in the same ownership on the appointed day in the LEP2000. The LEP provides that if the combined area of both lots is at least 2ha then an application can be considered for a single dwelling.

The applicant states that the two lots have a combined area of 5.34ha. If this is correct and the two lots were in the same ownership on the appointed day then one dwelling could be considered. However, the application is for 28 dwellings, which is equivalent to 20 dwellings per 2ha. This would be a variation of 1,850% to the control in the LEP which again is unacceptable.

**Due to the very high residential density in the application, compared to the very low density controls in the LEP2000, the application should be refused.**

**GENERAL PRINCIPLES***56 Retaining unique environmental features on the site*

The location of the development would result in the removal of good quality bushland from considerable area within the site. The proposal does not adequately protect the native flora on the site.

## *60 Watercourses and aquatic habitat*

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

### **NATURAL DRAINAGE AREA**

The development site is located over a natural drainage line within the catchment of Wheeler Creek.

The proposed location of the boarding house is situated on a natural drainage line. The drainage line is well defined at the base of a natural gully which is located at the headwaters of a waterway which flows towards Wheeler Creek. The drainage line could also be described as an ephemeral watercourse.

The proposal does not satisfy requirements of the desired future character that:

- “the ecological value of natural watercourses are maintained” and
- “The natural landscape including landform and vegetation will be protected and, where possible, enhanced.”

### **BUSHFIRE PRONE AREA**

*Hazardous fuels surrounding the proposed boarding house consist of forest vegetation located within the immediate vicinity of the building footprint (north, north-west and west) transitioning to tall heath vegetation approximately 120m to the east of the building.*

The site is located in a bushfire prone area that is not suitable for a boarding house.

### **APZ**

The APZ requires clearing of bushland from the slopes of the natural gully, including the rocky ridge areas along the western slope.

The proposed development site requires clearing of good quality bushland in a natural gully that also provides good habitat for native fauna. The gully forest contains moderately dense ground cover including ferns which are characteristic of moist habitat areas.

The proposed location of the dwelling and APZ does NOT minimise the impact on the site and is not consistent with the DFC, which states: “Buildings will be located...in areas that will minimise disturbance of vegetation and landform”.

The NE corner, which is near to Willandra Road, contains an area that has been disturbed previously. It is preferable that vegetation removal and soil disturbance is restricted to this area.

### **SOILS**

*The soil landscape is ‘Lambert’ (Chapman and Murphy, 1989). This soil landscape has a very high soil erosion hazard, largely because the sandy soil has minimal coherence, and would be readily mobilised by concentrated flow.*

The removal of natural vegetation and disturbance of soils will increase the potential for erosion and siltation within the catchment.

## **FLORA & FAUNA**

The site provides core habitat for many native species of fauna, including threatened fauna. The site in its natural condition supports a dense and diverse habitat. This includes a ground layer of vegetation that comprises shrubs, ferns and vines.

### **Sandstone Gully Forest**

- *This vegetation community comprises just over 40% of Lot 810 and mostly within the central portion of the Lot.*
- *The height of the canopy is approximately 17-22m tall and up to 25m tall in the more sheltered areas. The projected foliage cover is moderate, around 30-45%. The canopy height decreases towards the edge of the Banksia Scrub.*
- *The mid-storey is moderately dense and diverse with a number of shrubs and small trees varying between 1 and 10m tall. The projected foliage cover of the mid-storey within quadrat 1 was 40-50%.*
- *The ground layer of vegetation (to 1m tall) is moderately dense but comprises more small shrubs, herbs, ferns and vines than it does grasses.*

## **CONSERVATION VALUES**

The Warringah Biodiversity Conservation Study (September 2011) assigns the following Conservation Values to the area in which the site is located:

- Conservation Significance – Creek: Category A (Wheeler Creek Catchment).
- Conservation Significance – Connectivity: Regional Core
- Conservation Significance Rating: Very High

The boarding house and APZ would be located in regional core habitat within the Wheeler Creek Catchment.

## **ENVIRONMENTAL IMPACTS**

Under s79 C of the EP&A Act matters for consideration include the likely impacts of that development on the natural environment in the locality.

The boarding house would be located in a gully in the Narrabeen Lagoon Catchment. The drainage line lies within the Wheeler Creek Catchment and flows towards a tributary of Wheeler Creek, which has high conservation value.

The environmental impacts associated with the boarding house, APZ and Effluent Treatment Area, driveway access and services that require soil disturbance, are NOT compatible with the DFC.

The boarding house would have direct and indirect impacts on the environment and would have a greater impact than a single dwelling due to the number of inhabitants, increased demand for on-site effluent treatment etc. The impacts would be cumulative as they would be associated with ongoing impacts on the surrounding area.

**Mitigation measures**

The mitigation measures associated with the development proposal do not compensate for the extensive removal of bushland for APZ, disturbance of soils and changes to hydrology. Storm-water mitigation measures such as the rubble drains are not a substitute for the existing bushland and natural landforms.

**For the above reasons, we believe that the development proposal should be refused.**

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. C. Bennett'.

Judith Bennet  
President, Friends of Narrabeen Lagoon Catchment