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25 May 2023

Heritage Assessment Officer
Northern Beaches Council
725 Pittwater Road,
Dee Why NSW 2099

To whom it may concern,

RESPONSE TO COUNCIL RFI - HERITAGE - 4 DELMAR PARADE AND 812 PITTWATER ROAD DEE WHY (DA2022/0145)

Urbis has been engaged by Dee Why 3 Pty Ltd & Dee Why 4 Pty Ltd as the heritage consultant for the proposed redevelopment of the site located at 4 Delmar Parade and 812 Pittwater Road, Dee Why (the subject site), which is currently under assessment by the Northern Beaches Council (DA2022/0145). The proposed work entails demolition of the existing structures on the subject site and construction of a multi-storey mixed-use development. The subject site is located adjacent to the heritage listed, 'Stony Range Flora Reserve Conservation Area' (C6) included in *Schedule 5* of the *Warringah Local Environmental Plan (LEP) 2011* (herein referred to as the Reserve).

Urbis previously prepared the Heritage Impact Statement for the development application. This letter provides a response to heritage commentary provided in the Heritage Referral Response issued by Northern Beaches Council on the 18 January 2023.

SITE AND HERITAGE CONTEXT

The subject site is located at 4 Delmar Parade and 812 Pittwater Road, Dee Why and is legally described as SP 32071 and SP 32072. The subject site is not listed as an individual heritage item, nor is it located within a heritage conservation area. However, it is located adjacent to the heritage listed 'Stony Range Flora Reserve Conservation Area' (C6) included in *Schedule 5* of the *Warringah Local Environmental Plan (LEP) 2011*.

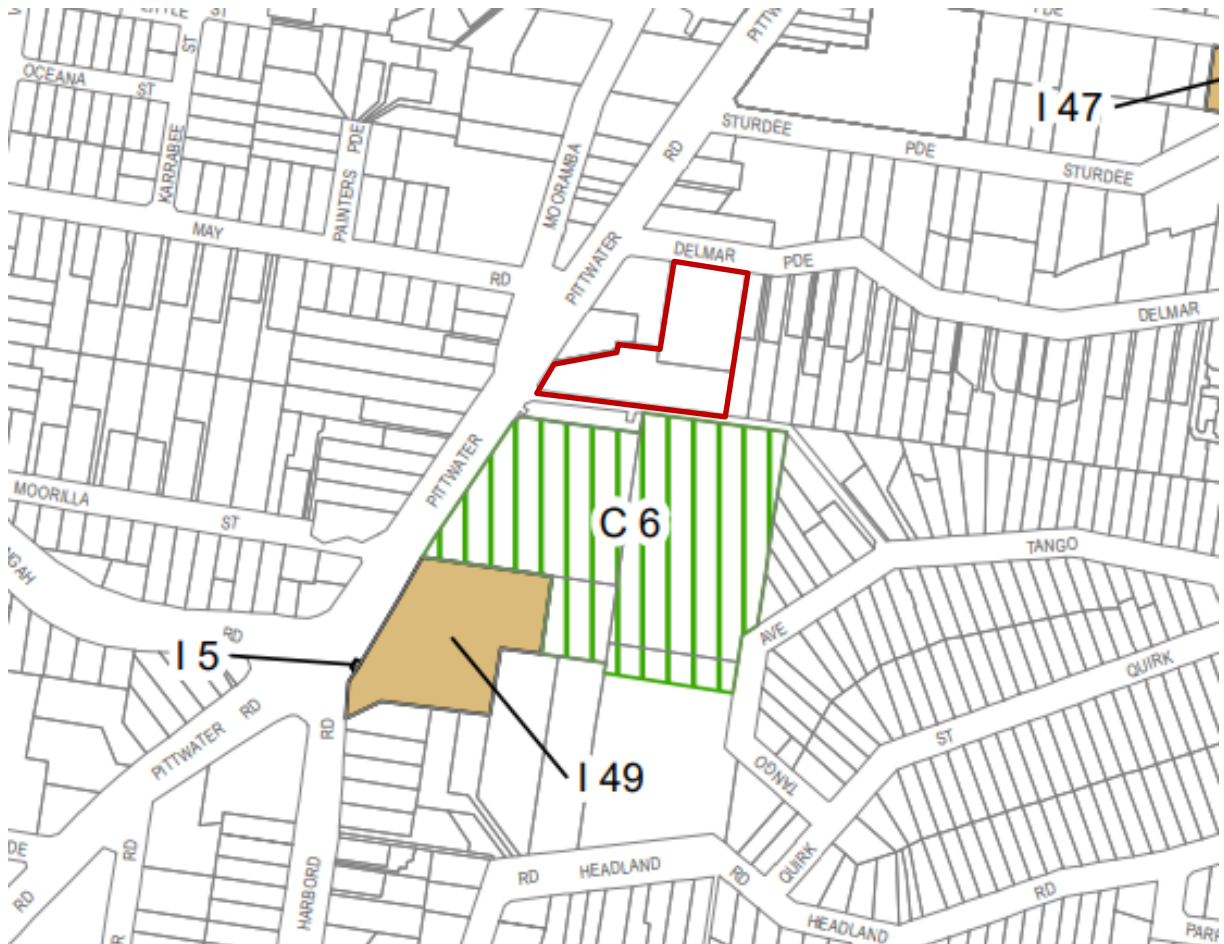


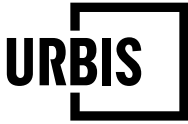
Figure 1 – Extract of heritage map with the subject site outlined in red.

Source: Warringah LEP 2011, Heritage Map HER_10A

Statement of Significance – Stony Range Flora Reserve Conservation Area (C6)

The State Heritage Inventory includes a statement of significance for the Stony Range Flora Reserve Conservation Area as follows:

The Stony Range Flora and Fauna Reserve has a high degree of local significance for growing a wide range of native flora, mostly endemic to the Sydney Region, and for contributing to community awareness of them. It is a skilfully and aesthetically designed, laid out and planted cultural landscape which has a combination of scientific, research



and educational functions which are much valued by the community, both local and regional.¹

RESPONSE TO COUNCIL FEEDBACK

The RFI – Heritage Referral Response provided by Northern Beaches Council (dated 18 January 2023) included the following heritage comments:

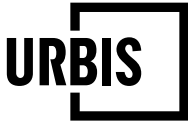
The subject site is not a listed heritage item but adjoins a heritage conservation area with a small section of parking area to the immediate south of the proposal. The impact of the existing buildings on the subject site, adjoining the reserve, is considered neutral, however the proposed high rise building, replacing the existing two storey building, located at the south-west of the site, is considered to impact upon the significance of the HCA and also to impact upon the views to and from the HCA, especially views from Pittwater Road. Heritage would recommend the low-rise section of the proposal to be located adjacent to the conservation area, to minimise the impact.

Heritage also raised concerns for the possible overshadowing impact of the high-rise portion of the proposal on the heritage listed reserve, given that the extent of the overshadowing to the south is not clear from the submitted documents.

In response to Council's comments, Urbis provides the following:

- The visual context of the subject site is predominantly urban in character and includes large-scale commercial, retail, medium density residential and mixed-use buildings. The area is currently undergoing substantial transformation from low scale office premises and light-industrial buildings to mixed-use development that includes commercial and residential.
- The proposed development is in accordance with Northern Beaches Council planning controls. The subject site, including the part of the site that borders the Reserve is zoned as MU1: Mixed Use and has a Building Height planning control of 24 metres towards Pittwater Road and 16 metres to the rear.
- Urbaine Design Group was engaged to prepare a Visual Impact Assessment (VIA) that included eleven different vantage points within the Reserve looking towards the proposed development. Urbis have reviewed the VIA prepared by Urbaine Design Group (dated May 2023). Views to the proposed development would be negligible due to the density of foliage within the Reserve and would not detract from the overall heritage significance of the Reserve. As above, the proposed bulk, scale and massing of the proposal is not inconsistent with that of which would reasonably have been anticipated by the planning controls.
- Existing views from the public domain along Pittwater Road towards the Reserve are predominantly restricted to close views towards the Reserve to the south of the subject site. These views will not be impacted by the proposal.
- Existing views towards the Reserve from the public domain in the wider landscape are predominantly obscured by existing built form, including the extant buildings at the subject site.

¹ NSW Heritage, 'Stony Range Flora Reserve Conservation Area',
<<https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2610089>>



- Whilst it is acknowledged that the proposed redevelopment of the site is larger in scale, form and height than the existing two-storey warehouse structures, the existing warehouse and industrial complex located on the subject site provides no contribution to the heritage significance of the Reserve. The proposed development will provide an enhanced setting comparatively and aims to activate the site via the provision of the north south axis through the site which will enable a visual connection through the site to the Reserve, resulting in a positive heritage outcome.
- Rothelowman Architects have prepared shadow diagrams (dated 11 May 2023) that provide further evidence regarding potential overshadowing of the proposed development and accompany this submission. Potential overshadowing would be negligible and would not detract from the significance of the Reserve.

CONCLUSION

It is assessed that the proposed redevelopment of the subject site located at 4 Delmar Parade and 812 Pittwater Road, Dee Why will have an acceptable impact on the adjacent heritage listed bush Reserve.

On the basis of this assessment, it is recommended that Council view this application favourably on heritage grounds.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Zulaikha". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rebecca Zulaikha
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