
From: DYPXCPWEB@northernbeaches.nsw.gov.au
Sent: 6/04/2025 11:54:36 AM
To: DA Submission Mailbox
Subject: Online Submission

06/04/2025

MR Andrew Bellamy
7 Eungai PL
North Narrabeen NSW 2101
[REDACTED]

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

Dear Northern Beaches Council,

I am writing to express my concern with the proposed development at 116 Nareen Parade NORTH NARRABEEN NSW 2101 (Application Number: DA2025/0266). The proposed development poses significant concerns regarding environmental impact, community safety, community character, infrastructure strain, and long-term resilience and sustainability. North Narrabeen has a unique coastal environment with Nareen Creek and the Nareen Wetland flowing into Narrabeen lagoon. This area is a haven for biodiversity with an abundance of flora and fauna which needs to be preserved.

One of the most concerning aspects of development at 116 Nareen Parade is its potential impact on Nareen Creek, a fragile and ecologically significant waterway. Nareen Creek supports a diverse range of native flora and fauna, including protected species, is a significant catchment area for a rare Sydney wetland area (Nareen Wetland) and the coastal estuary of Narrabeen Lagoon and plays a crucial role in local water management. Increased urbanization in its vicinity could lead to:

- **Habitat Destruction:** Clearing vegetation near the creek will disrupt the ecosystems that depend on it, reducing biodiversity and displacing native wildlife. I have observed an abundance of wildlife at the northern tip of 116 Nareen Parade which is directly across the road from my house including eels, turtles, water dragons, green tree snakes, various types of frogs (Peron's Tree Frogs, Tusked Frogs and Striped Marsh Frogs as identified by the Australian Museum Scientists using the Frog ID App), Bandicoots, Brush Tail and Ring Tail Possums, Flying Foxes, Micro Bats, Powerful Owls, Tawny Frog Mouths, Bush turkeys (with a large nest) and Kookaburras, to name just a few
- **Water Pollution:** Runoff from construction, roads, and increased human activity could introduce pollutants, sediments, and chemicals into the creek, degrading water quality.
- **Erosion and Flooding Risks:** Altering the natural landscape could exacerbate soil erosion and increase flood risks, in extreme weather events. North Narrabeen has been significantly affected by flooding both up and downstream of the site including Nareen Parade, Gondola Road, Rickard Road, Eungai Place, Narroy Road and Lido Avenue in recent weather events. The councils flood report also indicates that these flooding events may become more frequent and severe due to global climate change. Any changes to this large and important overflow area could exacerbate flooding both up and downstream. It may also make it harder for existing residents to get insurance for flooding.

Any development at 116 Nareen Parade should seek to have a large, protected corridor along Nareen Creek to preserve this important ecosystem and environmental feature of the area. In addition to these environmental concerns I also have specific concerns related to some of the documentation that has been submitted with the DA. I am an environmental scientist who

has worked for more than 20 years dealing with contaminated land, hazardous materials, occupational hygiene and human health and from a professional perspective the documentation submitted does not meet the following minimum requirements:

- The hazardous material register identifies that the site contains, asbestos, lead paint, PCBs, and SMF. Due to the sites previous use, I would also expect the report to cover ozone depleting substances as there would have to be refrigerant gases in use for refrigeration and air conditioning.
- The register of asbestos according to Clause 425 of the WHS Regulation should indicate the location type and condition of the asbestos containing materials. The report provided with the DA specifically does not indicate the materials condition. In the case of the corrugated asbestos roof, the condition assessment is very important as the severe weathering of this material has deteriorated the upper surface to the point where it should be classified as friable.
- The asbestos register should be accompanied by a rigorous risk assessment that considers sensitive receptors including local residents and site workers.
- Based on the sites previous use I would expect that an environmental site assessment in accordance with NEPM requirements for contaminated sites be conducted. Some obvious reasons to suspect land contamination are as follows:
 - o Systematic use of pesticides and herbicides to maintain bowling greens.
 - o Uncontrolled fill behind the large retaining wall on the northern side of the building. This area will definitely be impacted by the proposed demolition, and I find it hard to believe no soil will be removed while demolishing this building.
 - o Uncontrolled filling under bowling greens should also be suspected.
- The Statement of Environmental Effects submitted with the DA indicates there are no geotechnical hazards despite the southwest corner of the building (that is to be demolished) clearly sitting within the H1 geotechnical hazard zone. The building itself appears to form a retaining wall on this side of the site and the land may be destabilise if not considered properly during demolition. Many residents along Eungai Place will tell you that this geotechnical risk is very real with large boulders from the escarpment sitting in our back yards.

At best I would describe the documentation submitted with this DA as lazy and at this point I don't believe it contains the diligence required to protect the safety of the environment and local community.

Regards

Andrew Bellamy