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Subject: Online Submission

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RE: DA2018/1692 - 810 / Willandra Road NARRAWEENA NSW 2099

Dear Northern Beaches Council,

RE: 810 Willandra Road, Narraweena DA2018/1692

The boarding house proposed at 810 Willandra Road, Narraweena should be rejected on the following grounds.

The applicant has already tried to unsuccessfully apply for a boarding house on this land in 2014 and previously in 2013. This DA was previously rejected and the considerations applied at that time should still stand under this new DA for a larger footprint development of the same type ie: Boarding House. The previous DA No: 2014/1164 had a smaller footprint than the current application.

The land to which this DA applies cannot be assessed under WLEP2011, or SEPP AH 2009 as it is DEFERRED LAND which HAS NOT YET BEEN ZONED. IT IS NOT AVAILABLE FOR URBAN DEVELOPMENT AT THIS TIME. IT MUST BE ASSESSED UNDER WLEP 2000.

None of the adjoining blocks of land have any development upon them. They are all native bushland. The impacts of developing a high-density urban boarding house development in the middle of 3 bushland blocks must be very carefully considered in terms of how this will impact the currently biodiverse nature of the area. This development would be completely out of character with the biodiverse bushland area in this context.

This land cannot not be built on in any capacity because it is not zoned urban and nor has it been opened-up for urban renewal release by Council.

Development of this land or approval of such a development on this land type is against the Strategic Plans of the Northern Beaches Council and the Greater Sydney Commission's plans outlined in the North District Plan for the Northern Beaches LGA.

The Council has advised they do not need to open-up any of the DEFERRED LAND to meet the housing targets for the Northern Beaches LGA.

The Greater Sydney Commission's North District Plan clearly outlines that a biodiversity mapping assessment is required on all the DEFERRED LAND across the Northern Beaches before any zoning can be applied. This has not yet been done. This is an important assessment to ensure that the biodiversity & endangered species, flora and fauna of the block in question, surrounding bushlands; and the entire DEFERRED LAND AREA is properly assessed prior to any zoning being applied. No development should be approved on any DEFERRED LAND MATTER due to this requirement.

Classification = Deferred land is Land which may be identified for future urban uses following the extension of urban services, the progressive development of adjacent urban areas, and resolution of any environmental planning and assessment requirements relating to development. None of these uses have been satisfied for the land parcel known as 810 Willandra Road, Narraweena.

It is illogical to approve this DA as the issues relating to the actual types of developments that

will be allowed on the land have not yet been resolved.

REASONS FOR REJECTION:

- The proposed DA should be rejected solely on the basis that it is intending to place a development on DEFERRED LAND.
- This is non-urban land.
- This DA is an "urban development". It is a high-density development. Urban development cannot be built on un-zoned non-urban land which is currently DEFERRED LAND which is yet to be zoned. It must therefore be rejected, no exceptions.
- The land is not able to be developed under its current classification.
- There is no sewerage management currently on the land. There is no approved document from Sydney Water saying that this land is appropriate for sewerage connection; and therefore, it is non-compliant and should be rejected. The land is unsuitable for onsite self-contained sewerage tank management.
- This Deferred LAND falls under WLEP 2000 which means SEPP AH 2009 doesn't apply and nor does WLEP 2011. It is important that Council's assessment reports do not contain conflicts of interest in this regard, which the referral responses seem to be doing.
- Under Warringah LEP 2000 this NON-URBAN deferred matter is NOT able to have 1 dwelling on it as it doesn't meet the hectare size requirements of 1 dwelling per 20 hectares. This land parcel is Lot 810 DP 752038 Land Area: 5.43 Ha.
- This land is not a zone type to which SEPP AH 2009 relates and accordingly this land is not developable nor assessable under this legislation.
- There are 13 parcels of deferred land within the Northern Beaches LGA. These un-zoned lands are largely natural bushland containing biodiversity, endangered species, high fire risk areas and natural flood plains, waterfalls and landslip areas. The Deferred Matter or "lands" total many hectares and include Crown Land and Aboriginal Council Owned Land.
- Assessors should very carefully consider what precedent they set when deciding on whether this inappropriate DA should be recommended for approval, to ensure a dangerous precedent is not set for inappropriate overdevelopment across all 13 "at risk parcels of deferred land". This Deferred land extends from Belrose, Davidson and Oxford Falls all the way to Narrabeen Lagoon, Cromer and Wakehurst parkway.
- No assumptions should be made that it can be approved "if XYZ are achieved". The application should be assessed on its current merit and the current land classification, not by assuming documentation or approvals that have not yet been provided will comply in the future.
- This DA is not aligned with the future planning vision of the Northern Beaches.
- There is no built form near this parcel.

President - Northern Beaches Strategic Community Group