

DEVELOPMENT APPLICATION ASSESSMENT REPORT

Application Number:	DA2020/1533
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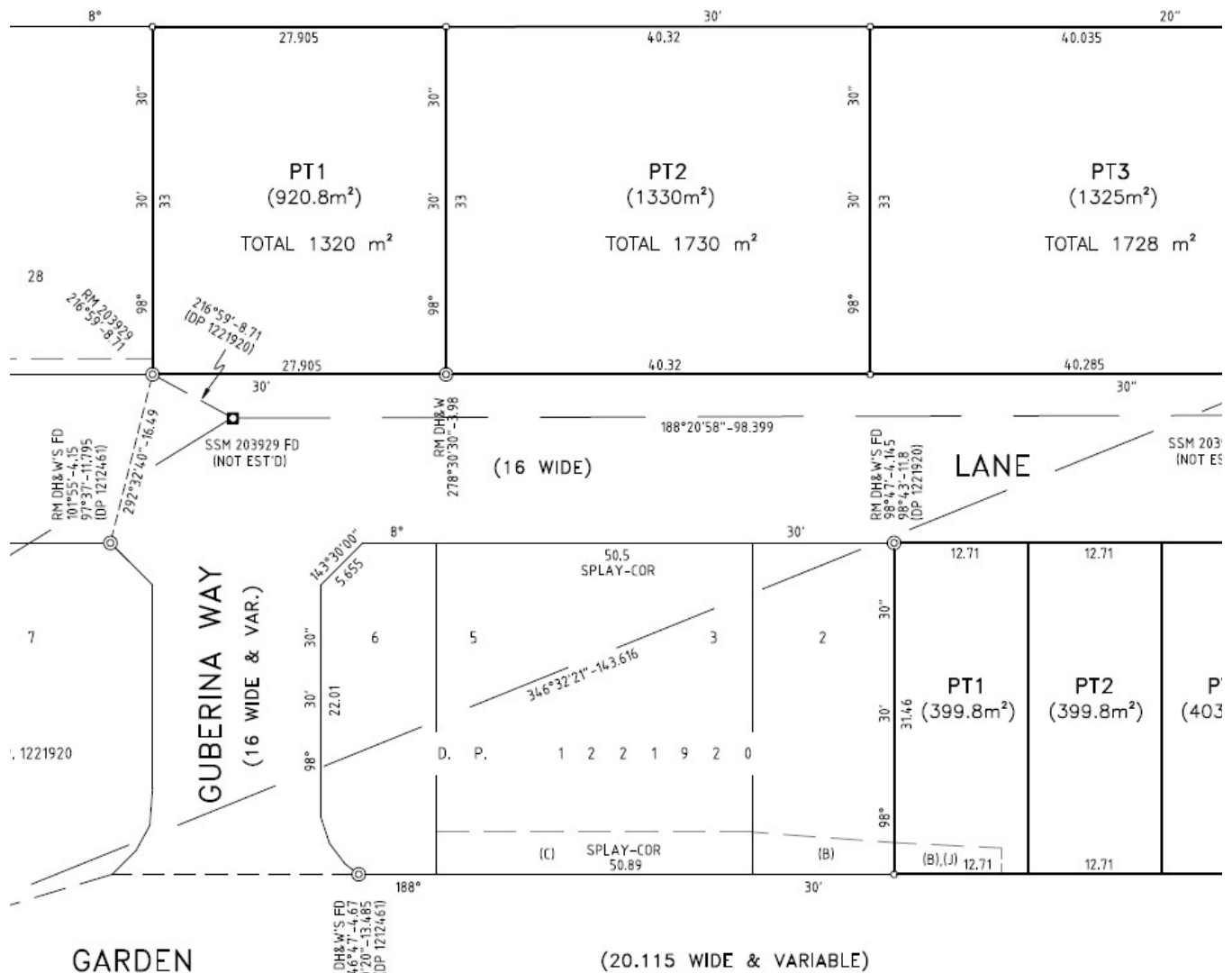
Responsible Officer:	Jordan Davies
Land to be developed (Address):	Lot 1 DP 1221920, Dove Lane WARRIEWOOD NSW 2102
Proposed Development:	Subdivision of land
Zoning:	R3 Medium Density Residential
Development Permissible:	Yes
Existing Use Rights:	No
Consent Authority:	Northern Beaches Council
Land and Environment Court Action:	No
Owner:	Abax Contracting Pty Ltd
Applicant:	Abax Contracting Pty Ltd

Application Lodged:	12/01/2021
Integrated Development:	No
Designated Development:	No
State Reporting Category:	Subdivision only
Notified:	22/01/2021 to 05/02/2021
Advertised:	Not Advertised
Submissions Received:	1
Clause 4.6 Variation:	Nil
Recommendation:	Approval

Estimated Cost of Works:	\$ 0.00
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PROPOSED DEVELOPMENT IN DETAIL

The proposed development is for a 'paper subdivision' of an existing residue lot. The proposal is to subdivide the land into three lots, each of the lots being split as a 'part lot' containing an equal portion of an existing basin lot. The proposed layout is as follows:



The lots to the western side of Dove Lane are each of a size enable future residential development in accordance with the dwelling yield requirements of Clause 6.1 PLEP 2014. The existing lot to the eastern side of Dove Lane contains a basin and is to be subdivided into part lots attached to each development lot on the western side of Dove Lane.

There is no physical works associated with the proposed subdivision.

ASSESSMENT INTRODUCTION

The application has been assessed in accordance with the requirements of the Environmental Planning and Assessment Act 1979 and the associated Regulations. In this regard:

- An assessment report and recommendation has been prepared (the subject of this report) taking into account all relevant provisions of the Environmental Planning and Assessment Act 1979, and the associated regulations;
- A site inspection was conducted and consideration has been given to the impacts of the development upon the subject site and adjoining, surrounding and nearby properties;
- Notification to adjoining and surrounding properties, advertisement (where required) and referral to relevant internal and external bodies in accordance with the Act, Regulations and relevant Development Control Plan;

- A review and consideration of all submissions made by the public and community interest groups in relation to the application;
- A review and consideration of all documentation provided with the application (up to the time of determination);
- A review and consideration of all referral comments provided by the relevant Council Officers, State Government Authorities/Agencies and Federal Government Authorities/Agencies on the proposal.

SUMMARY OF ASSESSMENT ISSUES

Pittwater Local Environmental Plan 2014 - 6.1 Warriewood Valley Release Area

SITE DESCRIPTION

Property Description:	Lot 1 DP 1221920 , Dove Lane WARRIEWOOD NSW 2102
Detailed Site Description:	<p>The subject site consists of one (1) allotment which is split into two 'part lots', with one large portion located on the western side of Dove Lane and the other part lot on the eastern side of Dove Lane. The eastern side contains a constructed stormwater detention basin, with the western lot is vacant.</p> <p>The western lot is regular in shape with a frontage of 108.51m along Dove Lane and a depth of 33m with a total area of 3577sqm. The lot on the eastern side of Dove Lane contains a stormwater basin and has a front of 38m along Dove Lane and a depth of 31.46m, with a total area of 1203sqm.</p> <p>The site is located within the R3 Medium Density Residential zone, with the western lot vacant and the eastern lot containing a basin.</p> <p>The site is level and is void of any trees.</p> <p>Detailed Description of Adjoining/Surrounding Development</p> <p>Adjoining and surrounding development is characterised by two storey dwellings, vacant residential lots and medium density style development.</p>

Map:



SITE HISTORY

The land has been used for residential purposes for an extended period of time. A search of Council's records has revealed the following relevant history:

Application **N0067/16** for Torrens title subdivision of a yet to be created Lot into 28 allotments and associated civil works was approved by Pittwater council on 11/08/2016.

Application **N0379/14** for Two staged subdivision and associated civil works. Stage 1 provides for the Torrens Title subdivision of 6 Residential lots and a large residue, including the construction of a detention basin and associated landscaping and civil works. Stage 2 provides the subdivision of the residue lot, including the construction and dedication of a public road, the construction of a detention basin and associated landscaping and civil works at 2 and 2A Orchard Street and 204 Garden Street, Warriewood. approved by Pittwater Council on 30/07/2015.

Application History

The application was submitted originally as a four (4) lot subdivision which proposed to subdivide the western residue lot into three (3) development lots and the eastern lot as a separate lot containing a basin.

In Council's review of the application, concern was raised with the subdivision layout with regards to ongoing maintenance and future ownership of the separate basin lot on the eastern side of Dove Lane, as this lot would be an undevelopable lot that would result in an isolated asset which is not associated with any developable land.

In response to these concerns, an amended subdivision plan was submitted to Council which included the subdivision of the land into three (3) 'part lots', with a portion of the basin lot being included in each of the three development lots on the western side of Dove Lane. This arrangement results in each development lot being responsible for a portion of the basin lot to divide the future responsibility of maintenance and ownership of the basin lot.

Council also requested the applicant provide a concept development scheme to address Clause 6.1 of the Pittwater LEP with regards to residential density. The applicant subsequently provided this to Council to satisfy the concerns.

Council also requires a draft 88b instrument to set out the maintenance regime of the basin and process for any dispute resolution of basin maintenance into the future.

As the proposed amended plans did not increase any environmental impacts or number of lots, the application was not required to be re notified.

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT, 1979 (EPAA)

The relevant matters for consideration under the Environmental Planning and Assessment Act, 1979, are:

Section 4.15 Matters for Consideration'	Comments
Section 4.15 (1) (a)(i) – Provisions of any environmental planning instrument	See discussion on "Environmental Planning Instruments" in this report.
Section 4.15 (1) (a)(ii) – Provisions of any draft environmental planning instrument	Draft State Environmental Planning Policy (Remediation of Land) seeks to replace the existing SEPP No. 55 (Remediation of Land). Public consultation on the draft policy was completed on 13 April 2018. Site contamination has been considered under the parent subdivision which created the residue lot. The proposed development retains the residential use of the site, and is not considered a contamination risk.
Section 4.15 (1) (a)(iii) – Provisions of any development control plan	Pittwater 21 Development Control Plan applies to this proposal.
Section 4.15 (1) (a)(iiia) – Provisions of any planning agreement	None applicable.
Section 4.15 (1) (a)(iv) – Provisions of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation 2000)	<p><u>Division 8A</u> of the EP&A Regulation 2000 requires the consent authority to consider "Prescribed conditions" of development consent. These matters have been addressed via a condition of consent.</p> <p><u>Clause 50(1A)</u> of the EP&A Regulation 2000 requires the submission of a design verification certificate from the building designer at lodgement of the development application. This clause is not relevant to this application.</p> <p><u>Clauses 54 and 109</u> of the EP&A Regulation 2000 allow Council to request additional information. Additional information was requested in relation to amended subdivision layout to address stormwater basin ownership concerns.</p> <p><u>Clause 92</u> of the EP&A Regulation 2000 requires the consent authority to consider AS 2601 - 1991: The Demolition of Structures. This clause is not relevant to this application.</p> <p><u>Clauses 93 and/or 94</u> of the EP&A Regulation 2000 requires the</p>

Section 4.15 Matters for Consideration'	Comments
	<p>consent authority to consider the upgrading of a building (including fire safety upgrade of development). This clause is not relevant to this application.</p> <p><u>Clause 98</u> of the EP&A Regulation 2000 requires the consent authority to consider insurance requirements under the Home Building Act 1989. This clause is not relevant to this application.</p> <p><u>Clause 98</u> of the EP&A Regulation 2000 requires the consent authority to consider the provisions of the Building Code of Australia (BCA). This matter has been addressed via a condition of consent.</p> <p><u>Clause 143A</u> of the EP&A Regulation 2000 requires the submission of a design verification certificate from the building designer prior to the issue of a Construction Certificate. This clause is not relevant to this application.</p>
Section 4.15 (1) (b) – the likely impacts of the development, including environmental impacts on the natural and built environment and social and economic impacts in the locality	<p>(i) Environmental Impact The environmental impacts of the proposed development on the natural and built environment are addressed under the Pittwater 21 Development Control Plan section in this report.</p> <p>(ii) Social Impact The proposed development will not have a detrimental social impact in the locality considering the character of the proposal.</p> <p>(iii) Economic Impact The proposed development will not have a detrimental economic impact on the locality considering the nature of the existing and proposed land use.</p>
Section 4.15 (1) (c) – the suitability of the site for the development	The site is considered suitable for the proposed development.
Section 4.15 (1) (d) – any submissions made in accordance with the EPA Act or EPA Regs	See discussion on “Notification & Submissions Received” in this report.
Section 4.15 (1) (e) – the public interest	No matters have arisen in this assessment that would justify the refusal of the application in the public interest.

EXISTING USE RIGHTS

Existing Use Rights are not applicable to this application.

BUSHFIRE PRONE LAND

The site is not classified as bush fire prone land.

NOTIFICATION & SUBMISSIONS RECEIVED

The subject development application has been publicly exhibited from 22/01/2021 to 05/02/2021 in

accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and the Community Participation Plan.

As a result of the public exhibition process council is in receipt of 1 submission/s from:

Name:	Address:
Mr Lindsay Andrew Dyce	8 Mahogany Boulevard WARRIEWOOD NSW 2102

The following issues were raised in the submissions and each have been addressed below:

- Concern that proposed development could result in exceeding the dwelling yield under Clause 6.1 PLEP. Or alternatively, a CDC could be submitted which could result in less than the dwelling yield required.
- The landscaping of the stormwater detention basin as originally approved should be implemented and should be done as part of this application.
- The responsibility of on going basin maintenance needs to be quantified and specified to Council's satisfaction and also allow the public road to drain into the lots.
- The proposal to divide the ownership of the basin between 3 lots will be problematic for the future maintenance and could cause disputes regarding maintenance between the three development lot owners. A community title subdivision or strata subdivision is a better outcome.

The matters raised within the submissions are addressed as follows:

- *Concern that proposed development could result in excellence of dwelling yield under Clause 6.1 PLEP. Or alternatively, a CDC could be submitted which is less than the dwelling yield required.*
Comment:
This is discussed in detail later in this assessment report under the assessment against Clause 6.1 PLEP. The applicant has provided concept plans demonstrating how the sites can be developed within the permitted dwelling range yield and Council is satisfied with the details submitted. Should any CDC be issued by a Private Certifier this would be inconsistent with the requirements of the PLEP and any CDC could be void should this clause not be considered in the issuing of a CDC.
- *The landscaping of the stormwater detention basin as originally proposed should be implemented and should be done as part of this application.*
Comment:
Any incomplete landscaping works associated with the construction of the Basin is not an issue to be addressed as part of this application or a trigger to further enforce any previous works not completed as part of the subdivision certificate which created the basin lot. Any incomplete works are to be followed up as part of the bond and maintenance requirements as enforced by Council's development engineering or compliance team.
- *The responsibility of on going basin maintenance needs to be quantified and specified to Council's satisfaction and also allow the public road to drain into the lots.*
Comment:
The applicant has provided a draft 88b instrument which includes Northern Beaches Council (which includes a public road owned by Northern Beaches Council) as a benefited party which allows drainage of the public road into the basin (which is the existing approved situation

unchanged via this application). The draft 88b sets out the basin maintenance responsibility and ownership proportionate to the size of the development lots. These restrictions to be implemented as part of the 88b in the created lots to address the on going maintenance of the basin.

- *The proposal to divide the ownership of the basin between 3 lots will be problematic for the future maintenance and could cause disputes regarding maintenance. A community title subdivision or strata subdivision is a better outcome.*

Comment:

Council in the assessment of the application did raise with the applicant that a community title subdivision should be pursued for the proposal to achieve a more simple outcome with regards to basin maintenance into the future. However, the applicant does not agree to amend the application to a Community title subdivision and has put forward a Torrens title subdivision with an arrangement to split the ownership of the basin between the three development lots, along with the management regime to be stipulated on the 88b instrument. Whilst a community title subdivision would be a more simple solution for maintenance, the proposed Torrens subdivision with the maintenance requirements set out in the 88b has sufficient legal weight to require the owners of the lots to complete the ongoing maintenance and for Council to enforce maintenance should there be the need. Furthermore, the applicant has included the steps to be implemented within the draft 88b instrument for any dispute resolution between the owners should this occur.

Whilst it is acknowledged that community title subdivision is what would occur ordinarily in Warriewood Valley to deal with such matters regarding basin maintenance, the subject site is a unique circumstance where the surrounding lots and subject basin has already been subject to Torrens Title Subdivision, which includes a public road and private lots draining to the basin. Therefore, the proposed split ownership solution and 88b is appropriate in dealing with this particular circumstance in Warriewood Valley, with there being sufficient legal weight into the 88b to deal with maintenance requirements of the basin.

REFERRALS

Internal Referral Body	Comments
NECC (Development Engineering)	<p>Comments 3/6/21.</p> <p>The subdivision application has been amended to transfer ownership of the water quality treatment /OSD basin facility (Lot 1) to the future 3 proposed lots. Whilst this is a better outcome then the previous arrangement and not as ideal as a community title subdivision there are still ongoing concerns about dispute resolution and funding the ongoing maintenance of the basin between 3 separate future strata plans.</p> <p>It is noted also the Manager Strategic and Place planning recommends that legal advice should be sought on the 88B Instrument to specifically address dispute resolution and the maintenance of the water management facility for the life of the development. This recommendation is supported.</p> <p>Engineering conditions will be provided.</p>

Internal Referral Body	Comments
	<p>*Planner Comments - The proposed draft 88b instrument has been updated with details regarding dispute resolution and maintenance of the basin. It has been confirmed that the 88b has sufficient legal weight for the enforcement of the covenants in Council requiring future land owners to maintain the basin and to deal with dispute resolution.</p> <p>Comments 21/4/2021 The previous engineering comments still apply and also reference is made to the Natural Environment Riparian referral response which is supported also. The proposed subdivision into 3 lots is therefore not supported.</p> <p>Previous comments The proposed re-subdivision is not supported for the following reason: The original subdivision consent approval N0067/16 detailed a future stage 4 strata scheme part lot 1 west whilst part lot 1 east contained stormwater detention/bioretenction basin which has been built. The basin was built to treat stormwater runoff from the completed road (Dove lane) and part lot 1(stage 1). The stormwater detention/ bioretention basin was a requirement of the DA approved Water Management Report Issue 7 prepared by Civil certification Pty Ltd dated 30/01/2017.</p> <p>The stage 4 strata scheme was to fund the costs of the future maintenance of the detention/bioretenction basin.</p> <p>The SEE has not addressed how the above requirements for ongoing maintenance of the detention/bioretenction basin will be managed in to the future.</p>
NECC (Water Management)	<p>Updated Response The applicant has provided a new subdivision plan that has a Torrens subdivision of the main lot into three lots, with each lot owning one third of the stormwater basin. While ownership under community title would have been preferable, conditions have been applied that attempt to ensure maintenance of the basin under this ownership structure. Due to the ownership structure, it has not been possible to apply a condition requesting a maintenance contract is entered into, as would typically be required for these devices. To prevent disputes and avoid the need for Council compliance activities, owners are required to submit an annual maintenance report. This is commonly required by many Councils in the Sydney area.</p> <p>Previous response: A Torrens subdivision is not suitable for this lot, as the bio-retention basin at the proposed lot 4 is providing water management for the proposed lots 1-3. Therefore the proposed lots 1-3 will be responsible for maintenance and replacement of the basin on the proposed lot 4. Subdivision is possible under a community title arrangement only to ensure appropriate management of the basin.</p>

Internal Referral Body	Comments
	<p>1. It is not an effective arrangement for Council's compliance staff to rely on a positive covenant and a large number of individual property and strata managers (the current concept offered is two strata RFBs and a set of townhouses), with whom council would have to negotiate to achieve compliance with maintenance obligations and improvements. It is particularly difficult when the parties subject to the positive covenant do not own the land containing the shared infrastructure.</p> <p>2. The proposal presents significant risk to council in that the basin is located on a lot that will be retained by the developer. At some stage the developer will pass over ownership of the lot, and because it is an unsellable lot and a buyer is unlikely to be found, council as the provider of last resort, would be forced to take on the lot. While a positive covenant would still be in place, the first point still applies.</p> <p>Please note Pittwater 21 DCP C6.1 Integrated Water Cycle Management says: "With the exception of the Inner Creekline Corridor, the water management facilities will remain in private ownership. The maintenance responsibility for this private infrastructure remains with the owners of the land/development."</p>
Strategic and Place Planning (S94 Warriewood Valley)	<p>Updated Referral Comments (Issued 2 June 2021)</p> <p>Introduction</p> <p>This assessment is based on whether Strategic and Place Planning (S&PP) are satisfied with the additional details addresses the concerns initially raised by S&PP's response of 3 March 2021.</p> <p>The original Strategic and Place Planning Referral dated 03/03/2021 (TRIM: 2021/165361) requested the following information:</p> <p><i>1. Details of the proposed dwelling numbers and building footprint on Lots 1, 2 and 3 to ensure the future residential development of each of these lots addressing:</i></p> <p><i>a. the site-specific water management and impervious area controls developed in conjunction with detention basin on proposed Lot 4, and</i></p> <p><i>b. The distribution of a maximum 22 dwellings being accommodated across these three residential lots.</i></p> <p><i>2. Details on the future ownership and maintenance of Lot 4 including the detention basin contained within it, given that this DA creates this lot and will service the three residential lots the subject of this DA.</i></p> <p>Assessment of additional information</p> <p>Advice below seeks to reconcile how the additional information has addressed S&PP original concerns:</p> <p>1a. Proposed lots 1, 2 and 3 now show the building footprint of</p>

Internal Referral Body	Comments
	<p>residential accommodation. Separate DA's for the residential accommodation on each of these lots is subject to future DA.</p> <p>The subdivision is proposed to be Torrens Title and the applicant has now submitted an 88B Instrument. Concern is still raised on the ongoing maintenance and management of the water management facility; in particular as the lot containing the water management facility will form part of Lot 1, 2 and 3 and approach in the event of dispute between the 3 owners.</p> <p>Legal advice should be sought on the 88B Instrument to specifically address dispute resolution and the maintenance of the water management facility for the life of the development.</p> <p>1b. This development site is part of the former 204 Garden Street and 2, 2A Orchard Street Warriewood; and there is a remaining 22 new dwellings still to be realised. Proposed lots 1, 2 and 3 now show the building footprint of residential accommodation demonstrating there will be 22 dwellings across these 3 lots. Separate DA's for the residential accommodation on each of these lots is subject to future DA.</p> <p>As this DA is not proposing any new dwellings on Lots 1, 2 and 3, development contributions are not required/calculated at this time.</p> <p>2. In addition to the discussion to 1a immediately above, there is not enough certainty regarding the future management of the detention basin. This proposal presents a risk to Council:</p> <ul style="list-style-type: none"> a. If there were to be a dispute between the three owners who is the adjudicator? b. How is the basin managed after the 5 year agreement expires? c. How can the basin be managed effectively across the 3 allotments? <p>Given these specific risks and its implications on Council, S&PP are not supportive of this DA. It is acknowledged that it is up to the Assessing Officer to consider these matters among others.</p> <p>Development Contributions</p> <p>The Warriewood Valley Section 94 Contributions Plan Amendment 16 Revision 3 (the Plan) applies to all new developments in the Warriewood Valley Release Area. The Plan applies a levy to fund the infrastructure improvements required to support the future anticipated population in the release area. Nonetheless, section 2.5.1 of the Plan reads as follows:</p> <p><i>Developments Involving Land Subdivision Only - Warriewood Valley S94 Contributions Plan</i></p> <p><i>Where the land subdivision will create a lot to accommodate multiple dwellings being constructed on this lot, and the actual quantum of dwellings is unknown (i.e. not part of the development consent for the</i></p>

Internal Referral Body	Comments
	<p><i>land subdivision), the development contribution is not to be applied to this lot at this time. The contribution must be applied at the time when Council consents to the actual number of dwellings to be constructed on this lot.</i></p> <p>As this Development Application involves Land Subdivision only, development contribution is not required to be paid for this Development Application as the contribution can only be calculated when there is certainty on the quantity of new dwellings being approved by Council. It is understood that the residential development on proposed lots 1, 2 and 3 (being the lots being created by this DA) will be subject to a future DA(s).</p> <p>RECOMMENDATION</p> <p>The proposal is not supported due to the risks on Council regarding the uncertainty with the management of the water management facility. Legal advice should be sought on the 88B Instrument to specifically address dispute resolution and the maintenance of the water management facility for the life of the development.</p> <p>There are no conditions (specific to S&PP). Nonetheless, the applicant should be advised of the following:</p> <p><i>This DA is not subject to development contributions under the Warriewood Valley Section 94 Contributions Plan Amendment 16 Revision 3</i></p> <p><i>Development contributions will be imposed on future consents for the construction of dwelling(s) on the three residential lots being created by this Development Application.</i></p> <p><i>*Planner Comments - The proposed draft 88b instrument has been updated with details regarding dispute resolution and maintenance of the basin. It has been confirmed that the 88b has sufficient legal weight for the enforcement of the covenants in Council requiring future land owners to maintain the basin and to deal with dispute resolution.</i></p> <p>Original Referral Comments (Issued 2 March 2021)</p> <p>Applicant's Description of the DA</p> <p>The subject Development Application DA2020/1533, seeks development consent to subdivide the subject property into 4 Torrens Title lots. The applicant's Statement of Environmental Effects (SEE), prepared by Willow Tree Planning states:</p> <p>The primary objective of the proposal is to create appropriately sized residential lots (proposed Lots 1-3) which would be to facilitate future residential accommodation. Proposed Lot 4 will remain as a detention basin (existing) which will be utilised by proposed Lot 1-3. The detention basin was previously approved under DA N0379/14 (refer to</p>

Internal Referral Body	Comments
	<p>Table 1 [in SEE]).</p> <p>It is important to note that the future development and residential accommodation types for proposed Lots 1-3 are yet to be determined however, given the size and dimensions of these lots, it is considered reasonable to assert that these lots would be capable of catering to a range of residential accommodation typologies and are therefore suitable for the Site and its context...</p> <p>Based on a review of the existing development and development consents across the Site and Section 901A, the following yield applies:</p> <ol style="list-style-type: none"> 1. Stage 1 allotments – 6 dwellings 2. Stage 3 allotments – 27 dwellings 3. Stage 4 allotments – 3 dwellings [the subject DA]. <p>Total = 36 dwellings.</p> <p>The forecast dwelling yield is therefore consistent with the yield contained with the Strategic Review and with Clause 6.1(3) of the PLEP2014.</p> <p>Based on the submitted documents, the proposal is surmised as follows:</p> <p>Lot 1 = 920.8m² Lot 2 = 1330m² Lot 3 = 1325m² Lot 4 = 1203m² and containing the detention basin and is to service the 3 proposed lots</p> <p>The Site</p> <p>The subject property is a newly registered allotment that was subject of previously approved subdivisions (undertaken in three separate DA's) of the original parcels No. 204 Garden Street and 2, 2A Orchard Street Warriewood. The detention basin on proposed Lot 4 is an existing basin approved under consent N0379/14.</p> <p>Access onto the 4 proposed lots will be from the newly constructed Dove Lane.</p> <p>Assessment of the DA2020/1489</p> <p>This DA is a paper subdivision to create 4 lots as there are no earthworks required to facilitate the subdivision.</p> <p>Nonetheless, the SEE has erroneously stated this DA will result in 3 dwellings particularly given the size and dimensions of proposed Lots 1, 2 and 3. The overall subdivision/development of the parent lots (No. 204 Garden Street and 2, 2A Orchard Street Warriewood) is permitted up to 53 dwellings, therefore based on existing approvals there are up to 22 dwellings still to be realized.</p> <p>These 22 dwellings could be spread across the proposed Lots 1, 2</p>

Internal Referral Body	Comments
	<p>and 3 (to be created by this DA).</p> <p>I raise the following concerns:</p> <p>(1) Proposed Lots 1, 2 and 3 will contain residential accommodation in the future and should be the subject of future DA (not a Complying Development Certificate pathway) for the following reasons:</p> <p>a) Each of the proposed lots is subject to site-specific water management and impervious area requirements developed for the overall development of the parent parcels (namely No. 204 Garden Street and 2, 2A Orchard Street Warriewood) that these new lots are to be created from.</p> <p>b) Clause 6.1 of Pittwater LEP details the permissible dwelling range for each sector/buffer area and is to be read in conjunction with the Warriewood Valley Strategic Review; wherein any proposal that results in exceeding the permissible dwelling numbers for same inherently acts as a prohibition. The Complying Development Certificate pathway however will need to consider the permissibility based on Clause 6.1 and not just the zoning table (see TRIM 2020/501044).</p> <p>(2) The existing detention basin on proposed Lot 4 is inferred to only service proposed Lots 1, 2 and 3. Nonetheless, it is uncertain on the long-term ownership and ongoing maintenance regime of the detention basin and Lot 4.</p> <p>Additional Information should be requested to specifically address the 2 above-mentioned matters:</p> <p>Details of the proposed dwelling numbers and building footprint on Lots 1, 2 and 3 to ensure the future residential development of each of these lots addressing:</p> <p>a. the site-specific water management and impervious area controls developed in conjunction with detention basin on proposed Lot 4, and</p> <p>b. the distribution of a maximum 22 dwellings being accommodated across these three residential lots.</p> <p>Details on the future ownership and maintenance of Lot 4 including the detention basin contained within it, given that this DA creates this lot and will service the three residential lots the subject of this DA.</p> <p>Additionally, the applicant should be advised of the following:</p> <p>The SEE has erroneously stated that this DA will result in 3 dwellings particularly given the size and dimensions of proposed Lots 1, 2 and 3. Proposed Lots 1, 2 and 3 are of a size and dimensions that can accommodate in excess of a single dwelling house on each.</p> <p>The overall subdivision/development of the parent lots (No. 204 Garden Street and 2, 2A Orchard Street Warriewood) is permitted up</p>

Internal Referral Body	Comments
	<p>to 53 dwellings, therefore based on existing approvals there are up to 22 dwellings still to be realized.</p> <p>A maximum 22 dwellings can be distributed across proposed Lots 1, 2 and 3 (being the balance of permitted dwellings still to be accommodated on the overall development at former No. 204 Garden Street and 2, 2A Orchard Street Warriewood). Any more than 22 dwellings will exceed the maximum permitted dwelling range and will result in those dwellings being prohibited development.</p> <p>Given this DA does not contemplate the actual dwelling numbers for Lots 1, 2 and 3, the development contribution amount payable will be imposed on future consents for the construction of dwelling(s) on each of the three residential lots being created by this DA.</p>

ENVIRONMENTAL PLANNING INSTRUMENTS (EPis)*

All, Environmental Planning Instruments (SEPPs, REPs and LEPs), Development Controls Plans and Council Policies have been considered in the merit assessment of this application.

In this regard, whilst all provisions of each Environmental Planning Instruments (SEPPs, REPs and LEPs), Development Controls Plans and Council Policies have been considered in the assessment, many provisions contained within the document are not relevant or are enacting, definitions and operational provisions which the proposal is considered to be acceptable against.

As such, an assessment is provided against the controls relevant to the merit consideration of the application hereunder.

State Environmental Planning Policies (SEPPs) and State Regional Environmental Plans (SREPs)

SEPP 55 - Remediation of Land

Clause 7 (1) (a) of SEPP 55 requires the Consent Authority to consider whether land is contaminated. Council records indicate that the subject site has been used for residential purposes for a significant period of time and residential subdivision has previously occurred on the land. The land has previously been considered with regards to contamination risk under the parent subdivision and therefore this has previously been addressed. In this regard it is considered that the site poses no risk of contamination and therefore, no further consideration is required under Clause 7 (1) (b) and (c) of SEPP 55 and the land is considered to be suitable for the residential land use.

SEPP (Infrastructure) 2007

Ausgrid

Clause 45 of the SEPP requires the Consent Authority to consider any development application (or an application for modification of consent) for any development carried out:

- within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists).
- immediately adjacent to an electricity substation.

- within 5.0m of an overhead power line.
- includes installation of a swimming pool any part of which is: within 30m of a structure supporting an overhead electricity transmission line and/or within 5.0m of an overhead electricity power line.

Comment:

The proposal was referred to Ausgrid. No response has been received within the 21 day statutory period and therefore, it is assumed that no objections are raised and no conditions are recommended.

Pittwater Local Environmental Plan 2014

Is the development permissible?	Yes
After consideration of the merits of the proposal, is the development consistent with:	
aims of the LEP?	Yes
zone objectives of the LEP?	Yes

Principal Development Standards

Standard	Requirement	Proposed	% Variation	Complies
Minimum subdivision lot size:	No Minimum lot size	Lot 1: 1320sqm	N/A	Yes
		Lot 2: 1730sqm		
		Lot 3: 1728sqm		

Compliance Assessment

Clause	Compliance with Requirements
1.9A Suspension of covenants, agreements and instruments	Yes
2.6 Subdivision - consent requirements	Yes
6.1 Warriewood Valley Release Area	Yes
7.2 Earthworks	Yes
7.3 Flood planning	Yes
7.10 Essential services	Yes

Detailed Assessment

6.1 Warriewood Valley Release Area

The land is within Sector 901A under Clause 6.1 Warriewood Valley Release Area PLEP 2014. To address the requirements of the control, the applicant must demonstrate how the land can be developed to meet the minimum residential density targets which have been set by the *Warriewood Valley Strategic Review Addendum Report* to the satisfaction of Council.

Sector 901A requires a dwelling yield of no more than 190 dwellings or no less than 154 dwellings. However, Sector 901A covers a large area of land and includes parcels of land which are under separate ownership and therefore, the *Warriewood Valley Strategic Review Addendum Report* sets out

'sub sectors' for individual owners of land to achieve the dwelling yield to ensure the overall range for Sector 901A is achieved.

The subject land sits within a sub sector which must achieve a dwelling yield of between 53 and 66 dwellings. At present, there are 33 residential lots within the existing sub sector, leaving a remaining range of 20 to 33 dwellings to be achieved.

The applicant proposes to subdivide the land into three lots each with a developable area between 920sqm - 1330sqm , intended for future medium density residential development. The applicant has provided a draft concept plan which demonstrates 22 dwellings can be achieved through town houses (four townhouses) and two residential flat buildings (each containing 9 units).

The submitted scheme is generally in accordance with the built form controls contained within the PLEP/PDCP and Apartment Design Guidelines and therefore, Council is satisfied that the proposed subdivision can provide for future development which can achieve the dwelling yield required under Clause 6.1. Any of the built form is subject to a future application and is not approved under this development consent.

Pittwater 21 Development Control Plan

Compliance Assessment

Clause	Compliance with Requirements	Consistency Aims/Objectives
A1.7 Considerations before consent is granted	Yes	Yes
A4.16 Warriewood Valley Locality	Yes	Yes
B3.6 Contaminated Land and Potentially Contaminated Land	Yes	Yes
B5.15 Stormwater	Yes	Yes
D16.1 Character as viewed from a public place	Yes	Yes

THREATENED SPECIES, POPULATIONS OR ECOLOGICAL COMMUNITIES

The proposal will not significantly affect threatened species, populations or ecological communities, or their habitats.

CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN

The proposal is consistent with the principles of Crime Prevention Through Environmental Design.

CONCLUSION

The site has been inspected and the application assessed having regard to all documentation submitted by the applicant and the provisions of:

- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- All relevant and draft Environmental Planning Instruments;
- Pittwater Local Environment Plan;
- Pittwater Development Control Plan; and
- Codes and Policies of Council.

This assessment has taken into consideration the submitted plans, Statement of Environmental Effects, all other documentation supporting the application and public submissions, and does not result in any unreasonable impacts on surrounding, adjoining, adjacent and nearby properties subject to the conditions contained within the recommendation.

In consideration of the proposal and the merit consideration of the development, the proposal is considered to be:

- Consistent with the objectives of the DCP
- Consistent with the zone objectives of the LEP
- Consistent with the aims of the LEP
- Consistent with the objectives of the relevant EPIs
- Consistent with the objects of the Environmental Planning and Assessment Act 1979

It is considered that the proposed development satisfies the appropriate controls and that all processes and assessments have been satisfactorily addressed.

RECOMMENDATION

THAT Council as the consent authority grant Development Consent to DA2020/1533 for Subdivision of land on land at Lot 1 DP 1221920, Dove Lane, WARRIEWOOD, subject to the conditions printed below:

DEVELOPMENT CONSENT OPERATIONAL CONDITIONS

1. **Approved Plans and Supporting Documentation**

The development must be carried out in compliance (except as amended by any other condition of consent) with the following:

a) Approved Plans

Subdivision Plans - Endorsed with Council's stamp		
Drawing No.	Dated	Prepared By
Plan of subdivision of Lot 1 in DP 1221920, Ref 12063-DP1	15 September 2020	Mick Morris

b) Any plans and / or documentation submitted to satisfy the Deferred Commencement Conditions of this consent as approved in writing by Council.

c) Any plans and / or documentation submitted to satisfy the Conditions of this consent.

In the event of any inconsistency between conditions of this consent and the drawings/documents referred to above, the conditions of this consent will prevail.

Reason: To ensure the work is carried out in accordance with the determination of Council and approved plans.

2. **Prescribed Conditions**

- (a) All building works must be carried out in accordance with the requirements of the Building Code of Australia (BCA).
- (b) BASIX affected development must comply with the schedule of BASIX commitments specified within the submitted BASIX Certificate (demonstrated compliance upon plans/specifications is required prior to the issue of the Construction Certificate);
- (c) A sign must be erected in a prominent position on any site on which building work, subdivision work or demolition work is being carried out:
 - (i) showing the name, address and telephone number of the Principal Certifying Authority for the work, and
 - (ii) showing the name of the principal contractor (if any) for any building work and a telephone number on which that person may be contacted outside working hours, and
 - (iii) stating that unauthorised entry to the work site is prohibited.

Any such sign is to be maintained while the building work, subdivision work or demolition work is being carried out, but must be removed when the work has been completed.
- (d) Residential building work within the meaning of the Home Building Act 1989 must not be carried out unless the Principal Certifying Authority for the development to which the work relates (not being the Council) has given the Council written notice of the following information:
 - (i) in the case of work for which a principal contractor is required to be appointed:
 - A. the name and licence number of the principal contractor, and
 - B. the name of the insurer by which the work is insured under Part 6 of that Act,
 - (ii) in the case of work to be done by an owner-builder:
 - A. the name of the owner-builder, and
 - B. if the owner-builder is required to hold an owner-builder permit under that Act, the number of the owner-builder permit.

If arrangements for doing the residential building work are changed while the work is in progress so that the information notified under becomes out of date, further work must not be carried out unless the Principal Certifying Authority for the development to which the work relates (not being the Council) has given the Council written notice of the updated information.
- (e) Development that involves an excavation that extends below the level of the base of the footings of a building on adjoining land, the person having the benefit of the development consent must, at the person's own expense:
 - (i) protect and support the adjoining premises from possible damage from the excavation, and
 - (ii) where necessary, underpin the adjoining premises to prevent any such damage.
 - (iii) must, at least 7 days before excavating below the level of the base of the footings of a building on an adjoining allotment of land, give notice of intention to do so to the owner of the adjoining allotment of land and furnish particulars of the excavation to the owner of the building being erected or demolished.
 - (iv) the owner of the adjoining allotment of land is not liable for any part of the cost of work carried out for the purposes of this clause, whether carried out on the allotment of land being excavated or on the adjoining allotment of land.

In this clause, allotment of land includes a public road and any other public place.

Reason: Legislative requirement.

3. **General Requirements**

- (a) Unless authorised by Council:
Building construction and delivery of material hours are restricted to:

- 7.00 am to 5.00 pm inclusive Monday to Friday,
- 8.00 am to 1.00 pm inclusive on Saturday,
- No work on Sundays and Public Holidays.

Demolition and excavation works are restricted to:

- 8.00 am to 5.00 pm Monday to Friday only.

(Excavation work includes the use of any excavation machinery and the use of jackhammers, rock breakers, excavators, loaders and the like, regardless of whether the activities disturb or alter the natural state of the existing ground stratum or are breaking up/removing materials from the site).

- (b) Should any asbestos be uncovered on site, its demolition and removal must be carried out in accordance with WorkCover requirements and the relevant Australian Standards.
- (c) At all times after the submission the Notice of Commencement to Council, a copy of the Development Consent and Construction Certificate is to remain onsite at all times until the issue of a final Occupation Certificate. The consent shall be available for perusal of any Authorised Officer.
- (d) Where demolition works have been completed and new construction works have not commenced within 4 weeks of the completion of the demolition works that area affected by the demolition works shall be fully stabilised and the site must be maintained in a safe and clean state until such time as new construction works commence.
- (e) Onsite toilet facilities (being either connected to the sewer or an accredited sewer management facility) for workers are to be provided for construction sites at a rate of 1 per 20 persons.
- (f) Prior to the release of the Construction Certificate, payment of the Long Service Levy is required. This payment can be made at Council or to the Long Services Payments Corporation. Payment is not required where the value of the works is less than \$25,000. The Long Service Levy is calculated on 0.35% of the building and construction work. The levy rate and level in which it applies is subject to legislative change. The applicable fee at the time of payment of the Long Service Levy will apply.
- (g) The applicant shall bear the cost of all works associated with the development that occurs on Council's property.
- (h) No skip bins, building materials, demolition or excavation waste of any nature, and no hoist, plant or machinery (crane, concrete pump or lift) shall be placed on Council's footpaths, roadways, parks or grass verges without Council Approval.
- (i) Demolition materials and builders' wastes are to be removed to approved waste/recycling centres.
- (j) No trees or native shrubs or understorey vegetation on public property (footpaths, roads, reserves, etc.) or on the land to be developed shall be removed or damaged during construction unless specifically approved in this consent including for the

- erection of any fences, hoardings or other temporary works.
- (k) Prior to the commencement of any development onsite for:
- i) Building/s that are to be erected
 - ii) Building/s that are situated in the immediate vicinity of a public place and is dangerous to persons or property on or in the public place
 - iii) Building/s that are to be demolished
 - iv) For any work/s that is to be carried out
 - v) For any work/s that is to be demolished
- The person responsible for the development site is to erect or install on or around the development area such temporary structures or appliances (wholly within the development site) as are necessary to protect persons or property and to prevent unauthorised access to the site in order for the land or premises to be maintained in a safe or healthy condition. Upon completion of the development, such temporary structures or appliances are to be removed within 7 days.
- (l) A "Road Opening Permit" must be obtained from Council, and all appropriate charges paid, prior to commencement of any work on Council property. The owner/applicant shall be responsible for all public utilities and services in the area of the work, shall notify all relevant Authorities, and bear all costs associated with any repairs and/or adjustments as those Authorities may deem necessary.
- (m) The works must comply with the relevant Ausgrid Network Standards and SafeWork NSW Codes of Practice.
- (n) Requirements for new swimming pools/spas or existing swimming pools/spas affected by building works.
- (1) Child resistant fencing is to be provided to any swimming pool or lockable cover to any spa containing water and is to be consistent with the following;

Relevant legislative requirements and relevant Australian Standards (including but not limited) to:

 - (i) Swimming Pools Act 1992
 - (ii) Swimming Pools Amendment Act 2009
 - (iii) Swimming Pools Regulation 2018
 - (iv) Australian Standard AS1926 Swimming Pool Safety
 - (v) Australian Standard AS1926.1 Part 1: Safety barriers for swimming pools
 - (vi) Australian Standard AS1926.2 Part 2: Location of safety barriers for swimming pools.
 - (2) A 'KEEP WATCH' pool safety and aquatic based emergency sign, issued by Royal Life Saving is to be displayed in a prominent position within the pool/spa area.
 - (3) Filter backwash waters shall be conveyed to the Sydney Water sewerage system in sewered areas or managed on-site in unsewered areas in a manner that does not cause pollution, erosion or run off, is separate from the irrigation area for any wastewater system and is separate from any onsite stormwater management system.
 - (4) Swimming pools and spas must be registered with the Division of Local Government.

Reason: To ensure that works do not interfere with reasonable amenity expectations of

residents and the community.

ON-GOING CONDITIONS THAT MUST BE COMPLIED WITH AT ALL TIMES

4. **Maintenance of Stormwater Treatment Measures - Major**

Stormwater treatment measures must be maintained at all times in accordance with the Stormwater Treatment Measure Operation and Maintenance Plan, manufacturer's specifications and as necessary to achieve the required stormwater quality targets for the development.

Vegetated stormwater treatment measures must maintain an 80 percent survival rate of plantings and limit weed cover to no more than 10 percent of the total area of the stormwater treatment measure, and be kept free of sediment, debris and litter.

Ensure that all removed silt, rubbish, debris, and filter media will be disposed of in a manner consistent with all relevant laws and regulations in effect at the time.

Northern Beaches Council reserves the right to enter the property and carry out appropriate maintenance of the device at the cost of the property owners.

Reason: Protection of the receiving environment.

5. **Reporting of stormwater treatment measure maintenance**

As a minimum, the collective owners of the stormwater treatment measures are required to submit an annual maintenance report to Council by 1 September each year.

This report must detail the inspection and maintenance activities carried out on-site over the previous 12 months, including any waste disposal dockets.

Council reviews the reports to ensure appropriate maintenance is occurring, and is authorised under the Local Government Act 1993 to enter premises and serve penalty notices for failure to comply with maintenance requirements set out in the Positive Covenant.

Reports must be submitted annually from the issue of the subdivision certificate until five years after all burdened lots have received their final occupation certificate.

Reports must be directed to Council's Environment (Catchments) Team at catchment@northernbeaches.nsw.gov.au.

CONDITIONS THAT MUST BE COMPLIED WITH PRIOR TO THE ISSUE OF ANY STRATA SUBDIVISION OR SUBDIVISION CERTIFICATE

6. **Positive Covenant for Drainage Structures**

The Applicant shall submit a positive covenant (under the provisions of Section 88B of the Conveyancing Act) to be created on the final plan of subdivision and accompanying 88B instrument. The covenant will require the proprietors of the land to maintain the Water Quality Control /Stormwater detention basin located on Lot 1 (DP 1221920 east) in accordance with the standard requirements of Council.

The positive covenant should :

1) Reference the original council approved Water Management Report dated January 2017 (Issue 7) prepared by Civil Certifiers which details the Water Quality Control /Stormwater detention basin.

2) Reference a Council approved Stormwater treatment and operations maintenance manual for the Water Quality Control /Stormwater detention basin. This manual is to be prepared by Civil Certifiers.

The terms of the positive covenant are to be prepared to Council's standard requirements, which are available from Northern Beaches Council. Northern Beaches Council shall be nominated as the sole authority empowered to release, vary or modify such covenant. Details demonstrating compliance are to be submitted to the Principal Certifying Authority prior to the issue of the Subdivision Certificate.

Reason: To ensure ongoing maintenance of the on-site stormwater detention system

7. Restriction as to User (On-site Stormwater Detention)

The Applicant shall create a restriction as to user (under the provisions of Section 88B of the Conveyancing Act) on the final plan of subdivision and accompanying 88B instrument for the water quality control structure/on-site stormwater detention basin, restricting any alteration or additions to the system. The terms of such restriction are to be prepared to Council's standard requirements. Council shall be nominated as the party to release, vary or modify such restriction.

Details demonstrating compliance are to be submitted to the Principal Certifying Authority prior to the issue of the Subdivision Certificate.

Reason: To ensure no modification to the on-site stormwater detention structure without Council's approval.

8. Certification of Water Quality Control/On-site Detention Basin (Lot 1 DP1221920)

A Compliance Certificate is to be submitted by a the design engineer from Civil Certifiers confirming to the satisfaction of the Principal Certifying Authority that the water quality/on-site stormwater detention basin is functioning as designed to achieve the water quality/quantity outcomes as required by the Water Management Report prepared by Civil Certifiers dated January 2017 (Issue No7) and was constructed in accordance with the approved plans as nominated on the Development Consent (N0067/16) and relevant conditions of Development Consent. The Subdivision Certificate will not be released until this certification has been submitted and the Principal Certifying Authority has confirmed that this condition has been satisfied.

Reason: To ensure the Water Quality/On-site Detention System has been built to the appropriate standard

9. Sydney Water Compliance Certification

The Applicant shall submit a Section 73 Compliance Certificate under the Sydney Water Act 1994 issued by Sydney Water Corporation. Application must be made through an authorised Water Servicing Co-ordinator. Please refer to the Building Developing and Plumbing section of the web site www.sydneywater.com.au <<http://www.sydneywater.com.au>> then refer to "Water Servicing Coordinator" under "Developing Your Land" or telephone 13 20 92 for assistance.

Following application a "Notice of Requirements" will advise of water and sewer infrastructure to be built and fees to be paid. Please make early contact with the coordinator, since building of water/sewer infrastructure can be time consuming and may impact on other services and building, driveway or landscape design.

Details demonstrating compliance are to be submitted to the Principal Certifying Authority prior

to the issue of the Subdivision Certificate.

Reason: To ensure compliance with the statutory requirements of Sydney Water.

10. Release of Subdivision Certificate

The final plan of subdivision will not be issued by Council until the development has been completed in accordance with terms and conditions of the development consent.

Reason: Council's subdivision standards and the statutory requirements of the Conveyancing Act 1919.

11. Stormwater Treatment Operation and maintenance manual- Water Quality Treatment/ Stormwater Detention Basin (Lot 1 DP1221920)

An Operation and Maintenance Manual is to be prepared by Civil Certifiers detailing the Water Quality Treatment/ Stormwater Detention Basin maintenance intervals and regime to achieve the objectives of the original design. Costings for the maintenance requirements/schedule are also to be provided as an initial guide of maintenance costs for future landowners.

Maintenance of Stormwater Treatment Measures must be maintained at all times in accordance with the Stormwater Treatment Measure Operation and Maintenance Plan, manufacturer's specifications and as necessary to achieve the required stormwater quality targets for the development.

Vegetated stormwater treatment measures must maintain an 80 percent survival rate of plantings and limit weed cover to no more than 10 percent of the total area of the stormwater treatment measure, and be kept free of sediment, debris and litter.

Ensure that all removed silt, rubbish, debris, and filter media will be disposed of in a manner consistent with all relevant laws and regulations in effect at the time.

The on site stormwater detention control structure is to be regularly cleaned including all screens . All inlet pipes are to be also regularly inspected for blockages and cleaned accordingly.

Northern Beaches Council reserves the right to enter the property and carry out appropriate maintenance of the device at the cost of the property owners.

Reason: Protection of the receiving environment and receiving waters.

12. Positive Covenant, Restriction as to User and Registration of Encumbrances for Stormwater Treatment Measures

The positive covenant, restriction as to user and the certificate of title registered for DP1221920 are to be updated to reflect the new ownership arrangement for the stormwater treatment measures.

The terms of the positive covenant and restriction as to user are to be prepared to Council's standard requirements (available from Council) at the applicant's expense and endorsed by the Northern Beaches Council's delegate prior to lodgement with the Department of Lands. Northern Beaches Council shall be nominated as the party to release, vary or modify such covenant.

A copy of the certificate of title demonstrating the creation of the positive covenant and restriction as to user is to be submitted to the Principal Certifying Authority prior to the issue of

the Subdivision Certificate.

Reason: To identify encumbrances on land, ensure ongoing maintenance, and ensure modification to the stormwater treatment measures is not carried out without Council's approval.

13. Title Encumbrances

The Applicant shall ensure all easements, rights of carriageway, positive covenants and restrictions as to user as detailed on the plans and required by the development consent are to be created on the title naming Council as the sole authority empowered to release or modify.

Details demonstrating compliance are to be submitted to the Principal Certifying Authority prior to the issue of the Subdivision Certificate.

Reason: To ensure proper management of land.

14. Positive Covenant for dispute resolution and maintenance responsibility

A positive covenant (under the provisions of Section 88B of the Conveyancing Act 1919) is to be created on the final plan of subdivision and accompanying 88B instrument, outlining the steps and measures to be implemented with regards to dispute resolution relating to maintenance of the basin for any of the burdened properties, details of the maintenance regime to be implemented for each lot and proportion of responsibility for each lot within the plan of subdivision. The terms of the positive covenant are to be prepared to Council's standard requirements, which are available from Northern Beaches Council. Northern Beaches Council shall be nominated as the sole authority empowered to release, vary or modify such covenant. Details demonstrating compliance are to be submitted to the Principal Certifying Authority prior to the issue of the Subdivision Certificate.

Reason: To ensure ongoing maintenance of the on-site detention system.

15. Preparation of Final 88B Instrument

The final 88B is to be prepared in accordance with the draft 88B prepared by Storey and Gough Lawyers as provided to Council on 9 June 2021, except where amended by any condition within this development consent.

Reason: To ensure the ongoing maintenance of the storm water basin.

In signing this report, I declare that I do not have a Conflict of Interest.

Signed



Jordan Davies, Planner

The application is determined on 15/06/2021, under the delegated authority of:



Lashta Haidari, Acting Development Assessment Manager