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11/04/2025

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

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Date: 11.04.2025
To:
Thomas Burns,
Northern Beaches Council
725 Pittwater Road,
Dee Why NSW 2099

Objection Letter to Northern Beaches Council

We are writing to formally object to the proposed demolition of 116 Nareen Parade, North Narrabeen, NSW 2101, located within the C4 environmental area.

A. Inadequate Documentation Submitted to Council

1. The boundary survey prepared by Bee and Lethbridge Surveyors does not specifically mark the right-of-way gate, which is used daily by the community as a shortcut to school and other destinations. Additionally, the nearby small electrical substation is only outlined without an explanation or identification of its function.

The natural creek and watercourse markings are inconsistent. The creek is marked in blue on the northern side of the property but abruptly stops, leaving no connection to the ephemeral watercourse-an adjacent gully that typically contains water throughout most of the year. This gully is identified as a "natural watercourse" in the Erosion and Sediment Control plan but is only depicted with a green line and no accompanying explanation.

2. The erosion and sediment control plan prepared by Taylor Consulting is overly simplified and inadequate. It fails to provide proper protection along the aforementioned gully ("natural watercourse") and in areas where tree removal is proposed, including public spaces and the northern part of the property where the watercourse is located. This area also serves as parking space for residents of Eungai Place was completely omitted from the sediment control plan.

The plan indicates a small stockpile area on the eastern side of the property, which is positioned on a steep slope and lacks proper safeguarding measures. Despite the availability of typical erosion and sediment control guidelines on council websites and other online

resources, these were not incorporated into the submitted plan.

Moreover, there is no protection shown for properties at 5, 6, and 7 Kundibah Road, nor for No. 24 Eungai Place. Adjacent public land, including stairs and the cul-de-sac at the end of Eungai Place, is similarly left unprotected. As the stairs are situated at a higher elevation than the proposed demolition site, it is at risk of collapse.

3. The demolition plans, as prepared by Elo Architecture, indicate work beyond the boundary of 116 Nareen Parade, extending to areas behind the protective barrier fence on Nareen Parade shown on the erosion and sediment control plan prepared by Taylor Consulting.

4. Several trees proposed for removal are situated on public land outside the boundary of 116 Nareen Parade. The documentation does not clarify how public safety will be ensured during their removal.

5. The Traffic Management Plan, prepared by Safer Roads, Traffic Management Australia, fails to consider essential access routes, such as the right-of-way connection to Kundibah Road via Nareen Parade and No. 2 Tatiara Crescent's garage and pedestrian entry. The proposed exit onto Nareen Parade will cause significant disruption, both during demolition and future construction works.

Furthermore, the sharp corner at the entrance will pose challenges for trucks, which would need to navigate just one to two meters before turning. With no footpath in this area, children crossing Nareen Parade daily to access the Mirrool Street shortcut to Elanora Heights Primary School are at considerable risk. This section will necessitate the constant presence of traffic controllers during all working hours.

As this access point serves over 100 residential properties, the proposed traffic management measures will result in excessive disruption to the community.

6. As stated in the Waste Management Plan prepared by Rick Davis Contracting, a total of 2,085 tonnes of material is to be removed by truck and transported to a recycling outlet. Given the narrow roads and sharp corners in the area, it is assumed that smaller trucks will need to be used. This equates to approximately 173-174 trips with 12-tonne tipper trucks or 130-131 trips with 16-tonne tipper trucks. Such frequent truck movements will complicate access to the previously mentioned properties and generate excessive noise.

For this reason, it is essential that all affected properties on adjacent roads-including Tatiara Crescent, Bellara Avenue, and Eungai Place-are notified by the Council. However, many residents on Tatiara Crescent and Bellara Avenue have not been informed - as we checked the Notification Map.

7. Further clarification is needed regarding how the neighborhood will be safeguarded from disturbances, dust, and potential contamination during these works. For example, the use of open chutes during demolition should be strictly prohibited, and materials must be stored in enclosed containers or adequately covered while in skip bins to prevent dust and contamination. Given the confirmed presence of asbestos and other hazardous materials, these measures are critical.

8. The demolition proposal fails to appropriately consider the significance of the C4 environmental area and the potential environmental harm that the works may cause.

B. Lack of a Formal Development Application

Although no formal Development Application has been lodged, only a Demolition Application, the Statement of Environmental Effects for the property-prepared by Greg Boston of Boston Blyth Fleming Pty Ltd-provides insight into the developer's intentions.

In Section 4 of the Statutory Planning Framework under the Pittwater Local Environmental

Plan 2014 (PLEP 2014), the statement notes:

"The property is located within the C4 Environmental Living zone pursuant to the provisions of Pittwater Local Environmental Plan 2014 (PLEP 2014). Demolition works are permissible with consent. The demolition of the existing non-conforming Club use on the land to facilitate a residential subdivision consistent with the minimum lot size provisions and sensitive to the environmental characteristics of the site can be seen as better achieving the objectives of the C4 Environmental Living zone."

1. Based on this, it appears the developer intends to subdivide the land. With a minimum lot size requirement of 550m² and the total area of the property being 18,720m², under ideal conditions, up to 34 lots could theoretically be created.

/ 18 720m² : 550m² = 34.036 / However, we acknowledge that factors such as access, watercourses, and the land's shape may reduce this number.

2. Further, it is important to note the proposed changes to the Current LEP (PLEP 2014) under the Conservation Zones Review for 116 Nareen Parade, North Narrabeen. This review recommends rezoning the site from the C4 Environmental Living zone (where dual occupancies are prohibited) to NBC Residential (where dual occupancies are permitted). The review states:

"Land considered: Low Density Residential Area (see Zoning Methodology button)

Review recommendation: A conservation zone does not apply as the site does not meet the required thresholds for any Hazards Criteria, High Environmental Value (HEV) Criteria and/or Medium Environmental Value (MEV) Criteria."

3. This rezoning would allow for potential dual occupancies, meaning two homes could be constructed on each lot. Consequently, the developer may propose a new Development Application involving townhouses or dual occupancies, which would significantly increase the density of the area.

4. Should dual occupancies be permitted, the density of the C4 Environmental Living zone, encompassing Tatiara Crescent, Bellara Avenue, and Eungai Place-currently no-through roads accessible only via Nareen Parade-could increase unnaturally. This change would result in approximately 25-30 additional lots, or up to 34 in total /which is not achievable/, with the possibility of constructing two homes per lot.

5. With these streets currently containing slightly over 100 houses combined, adding 50-60 new residences would exacerbate traffic congestion, particularly at the Nareen Parade and Tatiara Crescent intersection. This bottleneck would dramatically alter traffic conditions and significantly impact the quality of life for residents in these areas.

C. Lack of Transparency

The absence of a Development Application highlights a lack of transparency in the process, necessitating the implementation of proper procedures to mitigate the significant community impact. The proposed demolition has the potential to drastically alter the character of this ecologically sensitive area, with far-reaching consequences for the environment and its residents.

The reports provided, including those addressing biodiversity, riparian zones, parks, reserves, foreshores, landscape, contaminated lands, arboriculture, and Ausgrid responses, focus exclusively on the demolition aspect.

We believe that if a formal development proposal were lodged, it would likely face significant opposition and be subject to more stringent conditions than the demolition application currently is.

This appears to be the primary reason why the Demolition Application was submitted prior to the Development Application.

D. Lack of Justification

We respectfully urge the planning authority to reconsider the proposed demolition and explore alternative solutions-such as preservation or adaptive reuse-that would allow the existing building to remain a valuable part of the community.

This reconsideration should address concerns including parking, public transportation accessibility, and the capacity of local roads to handle additional vehicular traffic. Ensuring that future development does not place undue strain on existing infrastructure is essential to preserving the quality of life for residents.

The northern part of the property currently supports wildlife and biodiversity, serving as a natural extension of the green network that facilitates wildlife movement. The land also provides an essential function in collecting and gradually releasing rainwater-an advantage that would be lost if developed.

Furthermore, the site has served recreational purposes for decades and continues to be utilized by the community for social, educational, and recreational needs, even following the closure of the RSL club. Its daily use by children and older residents underscores the enduring importance of this space to the local community.

We trust that the Council, equipped with the necessary expertise, will address these discrepancies and carefully reconsider the application to ensure proper procedures are followed. We respectfully request that the Planning Department review this demolition proposal thoroughly. Once the existing building is removed, the opportunity to preserve its legacy will be permanently lost.

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