



General Manager
Northern Beaches Council
Pittwater Rd
Dee Why 2099,

3 Bolwarra Rd
North Narrabeen 2101
28 January, 2017

Submission on Application number: PP0005/16 Draft Planning Proposal (rezoning) 6 Jacksons Road, 10 & 12 Boondah Rd Warriewood.

I object to this proposal and say it should be refused because;

1. The subject land is located in the designated Southern Buffer Zone, an area specifically adopted by Council under the Warriewood Valley Water Management Specification for Flood Mitigation.
2. The subject land is located generally at approximately 2m AHD (and under) and is identified as an Overland Floodway, being on flood prone land., It is therefore not capable of the up-zoning to the higher land use as proposed by this application.
3. The application claims there would be no adverse consequence for total overbank floodplain storage on site. However, the application proposes to achieve this stated purpose by way of excavating areas under buildings to below existing Natural Ground Levels. This is not feasible, due to potential groundwater infiltration or overtopping of the excavated volumes resulting in possible flooding of proposed car parking areas thereunder.
4. If approved, proper Flood Emergency Response Planning to deal with Predicted Maximum Flood levels will require a considerable raising of existing Boondah Rd levels. Such a re-constructed road elevation would result in unacceptable blockage of the extreme event overland flow path. Such a blockage was never designed for and would effectively be in conflict with existing Warriewood Valley Floodplain Risk Management calculations.

Further, the Floodplain Development Manual, which has direct relevance to this site, and by extension, the Southern Buffer Zone is covered by Appendix N of State Emergency Service, whereby Emergency Response Planning requires that persons seeking to escape from flooded areas should never have to ride or drive through floodwaters.

Further, essential Flood Emergency Response Planning as contained in National Best Practice Guidelines obliges authorities such as Council to ensure that overland escape routes must be provided to ensure that Overland Escape by Walking is possible and safe.

5. The planned land use for these and other Boondah Road properties is active and passive open space which should be adhered to for Flood Mitigation purposes.
6. The active space needs of this northern end of Northern Beaches Council (formerly Pittwater) have been comprehensively dealt with in "The Open Space Needs Study" by Heather Nisbett, which concludes there is a high need for not only extra playing fields at the local level, but also, even more so, in terms of District and Regional shortfalls.
7. Active and passive recreational use remains the outcome for the subject land as planned for by Council. It should be adhered to by Council, as being the highest order of land use capable within this heavily constrained Floodway.

Yours truly,

David James OAM