



CROMER GOLF CLUB

6th August 2013

The Director General
NSW Department of Planning & Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Dear Sir,

Re: Draft Oxford Falls Valley and Belrose North Draft Strategic Review

We forward our comments and response to the draft strategic review of the Oxford Falls Valley, which was circulated by the Department for public comment.

As a major landowner in the precinct we own a 13ha parcel of land that is wholly contained within the proposed E3 zoning. We note that we have previously objected for the purposes of this strategy to being included within the Oxford Falls valley as our land is completely detached from that location and should be assessed on its own merit.

Since 2005, we have been attempting to have 4.5ha, a minor portion of our holding rezoned to a low density residential use, in order to generate much needed funds for the Cromer Golf Club to complete substantial environmental works within the course proper as well as to secure the Club's financial future.

During the course of the last 7 years, our consultants have:

- Prepared extensive planning reports that endorse the potential and suitability of the land for development.
- Have engaged leading land planner and urban designer Gabrielle Morrish to prepare a range of suitable development options.
- Engaged specialist flora, fauna, bushfire and archaeology experts to inspect and report on the suitability of the land for development, and,
- Undertaken two rounds of public consultation presentations having notified 2,000 surrounding local households by direct mail.

To date it is our belief that at no time in this process has either the Department or the Warringah Council read a single word of these extensive submissions and the development potential of the land has yet to be considered in any professional manner.

Indeed we attach a copy of the Councils assessment of the land undertaken as part of the PAC review. We note that a key undertaking of the PAC was to invite the landowners to be present when this inspection took place. We were not afforded that opportunity or courtesy.

The one page tick the box analysis is superficial and totally inadequate as a means of assessment of whether land is suitable for any particular zoning consideration. When compared to the very extensive professional assessments undertaken by the Club, which have yet to be read or considered by Council, the Club questions the integrity of the entire process underpinning this Strategic Review.

The land, which we believe, needs to be assessed for development is shown overlayed on the attached zoning plan prepared by the Department. This land will support about 45 low-density dwellings and will be the final stage following the rezoning and development of adjoining land for housing with Landcom in the 1990's. Our land has no constraints at all and being located immediately adjacent to an existing urban precinct should qualify it for consideration as worthy of rezoning to a residential use.

Specifically, the reports attached to our submission coordinated by Andrew Wilson Town Planning Consultancy Service demonstrate in the constraints summary the following performance:

Riparian	No riparian zone
Significant vegetation	No evidence of threatened flora
Wetland buffers	No wetlands
Slope	No steep slope
Wildlife corridor	No evidence of threatened fauna
Flooding	No flood prone land
Acid Sulphate soils	No acid sulphate soils
Threatened species habitat	No evidence of threatened fauna
Isolated constrained land	Abuts existing urban area
Physical human infrastructure	Available
Cultural Heritage	No evidence
Bushfire	Not prohibitive
Proximity to centres	Commensurate with low density housing
Public transport	Available
Essential services	Available
Telecommunications buffer	No buffer

In short, the site identified has no constraints whatever and should be able to be assessed for new housing development and zoned R2 Low Density Residential.

We would also make comment upon the notions previously expressed by Council that there is no need for additional land for housing supply on the northern beaches at this time, and that our site is small, its yield is minimal and therefore it has no real value.

We submit that there is overwhelming evidence demonstrating an undersupply of housing in Sydney that is not keeping pace with demand and that our site is in a location more accessible and suitable than other housing release areas on the northern beaches. Its size and potential yield is irrelevant.

The site, if zoned residential, would be developed straight away to provide housing choice, which is a matter of planning concern to the Department. It would also potentially provide the community with a financial dividend from infrastructure charges as well as an enhanced environment on the Golf Club. The sites low constraints, low yield, low impact will have a much bigger financial impact for the community.

We submit that our 4.5ha site should be given serious consideration to be excised from the E3 zone and rezoned to R2 Low Density Residential as demonstrated on the attached draft zoning plan.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Katrina Brown', with a large, stylized initial 'K'.

Katrina Brown
President
Cromer Golf Club Ltd