

6 August 2013

Department of Planning
GPO Box 39
Sydney NSW 2001

Dear Sir / Madam

RE: DRAFT OXFORD FALLS VALLEY AND BELROSE NORTH CORRIDOR STRATEGIC REVIEW

1. INTRODUCTION

This submission on the Draft Oxford Falls Valley and Belrose North Corridor Strategic Review is made on behalf of Cromer Golf Club which owns approximately 13ha. of land surplus to its needs within the area covered by the Draft Strategic Review. It is accompanied by the 'Planning Report for Residential Release Area – Cromer Golf Club' prepared by JBA Urban Planning Consultants dated March 2006 (hereafter referred to as the enclosed JBA Planning Report).

This submission and the enclosed JBA Planning Report demonstrate that approximately 4.5ha. of the surplus Cromer Golf Club land is suitable for low density housing, and we request this 'subject site' be zoned R2 Low Density Residential in Warringah LEP 2011.

The surplus Cromer Golf Club land is legally described as Lot 2 DP 525492, Lot 859, 860 and 861 DP 752038 and Lot 22 DP 859782 and shown in Figure 1. The 'subject site' proposed for an R2 Low Density Residential Zone comprises parts of these lots as shown in Figure 2 and in the enclosed JBA Planning Report.

This submission and the enclosed JBA Planning Report are supported by an evidence base of detailed specialist studies prepared specifically for the subject site which remain relevant including the following:

- Flora and Fauna Assessment prepared by Cumberland Ecology;
- Geotechnical Assessment prepared by Douglas and Partners;
- Traffic Implications prepared by Colston Budd Hunt & Kafes;
- Bushfire Assessment prepared by BES;
- Aboriginal Archaeological Assessment prepared by Mary Dallas Consulting;
- Initial Engineering Assessment of Constraints and Opportunities prepared by Patterson Britton and Partners; and
- Masterplan Design Options Report prepared by GM Urban Design and Architecture.

The following section of this submission provides an assessment of the subject site against the constraint criteria in the Draft Strategic Review using the detailed findings in the specialist environmental planning studies supporting the JBA Planning Report which demonstrates its suitability for an R2 Low Density Residential Zone under Warringah LEP 2011.



Figure 1 – Surplus Cromer Golf Club Land (13ha. shown orange with red outline)

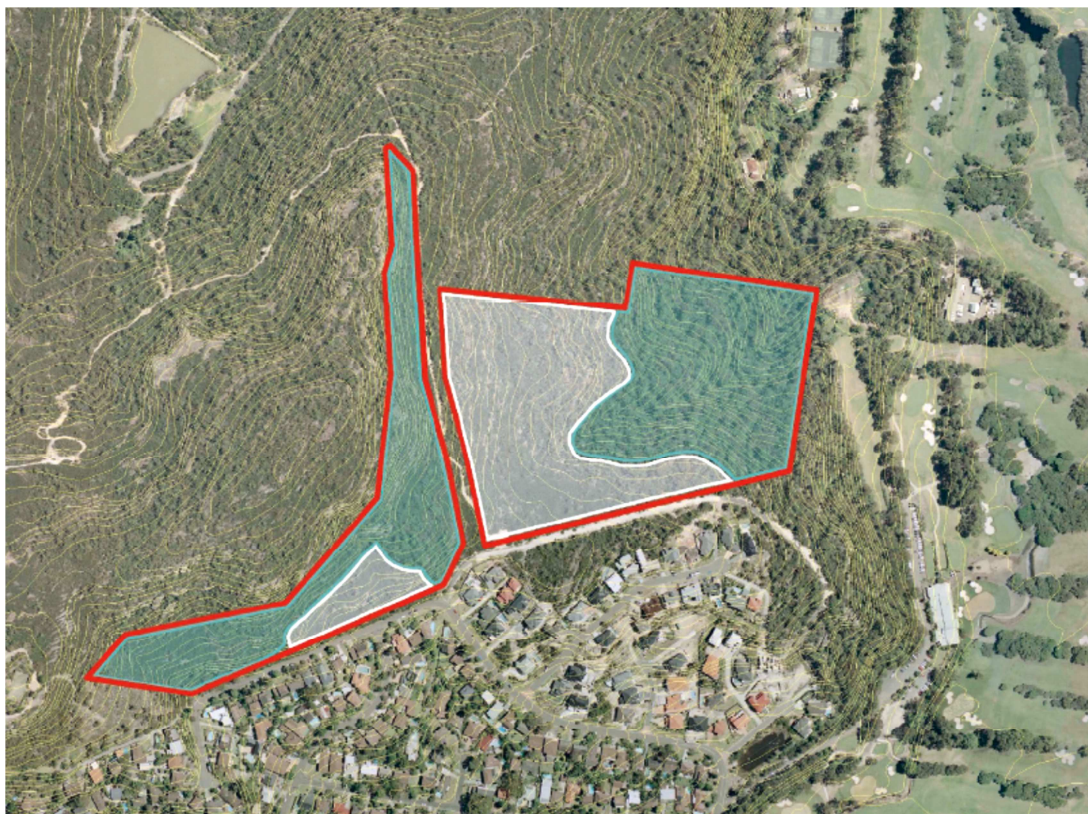


Figure 2 – 'Subject site' proposed for R2 Low Density Residential Zone (4.5ha. shown shaded white)

2. ASSESSMENT OF CONSTRAINT CRITERIA WITH DETAILED EVIDENCE BASE OF SPECIALIST ENVIRONMENTAL PLANNING STUDIES FOR SUBJECT SITE

The Draft Strategic Review includes an environmental constraints methodology for assessing land with primary and secondary environmental constraint criteria. This submission provides an assessment of the primary and secondary environmental constraints on the subject site according to the findings in the more detailed specialist environmental planning reports supporting the enclosed JBA Planning Report.

2.1 Assessment of Primary Environmental Constraints

The primary environmental constraints methodology used in the Draft Strategic Review comprise the following eight primary constraints:

- Riparian;
- Significant vegetation;
- Wetland buffers;
- Slope;
- Designated wildlife corridor or core habitat;
- Flooding;
- Acid sulphate soils; and
- Threatened species habitat.

An assessment of the above primary constraints on the subject site based on the findings in the specialist environmental planning reports used in the enclosed JBA Planning Report is provided below.

Riparian

The site is not identified in the Riparian Constraints Land Map in the Draft Strategic Review as having a riparian zone or buffer in Category A or B. There is no riparian zone running through the subject site or adjoining land of such special environmental significance or value as to preclude an R2 Low Density Residential Zone or warrant an E3 Environmental Management Zone over the site.

A specialist Engineering Assessment of Constraints and Opportunities for Rezoning prepared for the site by the engineers Patterson Britton and Partners Pty Ltd supports the enclosed JBA Planning Report and includes a comprehensive water management strategy. This specialist assessment demonstrates the site is capable of supporting new housing in an R2 Low Density Residential Zone in a way which can improve water quality and quantity conditions and conservation outcomes on the overall Cromer Golf Club land including both on the subject site and existing golf course.

Significant vegetation

The subject site is not identified as containing a threatened or rare community in the Significant Vegetation Constraints Land Map in the Draft Strategic Review.

A specialist Flora and Fauna Assessment prepared by Cumberland Ecology for the surplus Cromer Golf Club land and used in the enclosed JBA Planning Report provides a detailed evidence base and survey of flora and fauna on the land. It identifies the following vegetation communities on the land:

- woodland communities on the eastern lower slopes and western upper slope ridge top;
- scrub and low woodland communities on the central mid-slope.

Biodiversity / ecological value –The specialist Flora and Fauna Assessment finds that there is:

- no threatened flora species or EECs on the subject site;
- no evidence of threatened fauna on the subject site;
- limited habitat significance on the subject site given the above and the extent to which the vegetation communities are represented in the area.

The Significant Vegetation Constraints Land Map in the Draft Strategic Review and the specialist Flora and Fauna Assessment demonstrate that the vegetation on the subject site does not exhibit any special ecological, scientific, or biodiversity value that precludes an R2 Low Density Residential Zone or that particularly warrants an E3 Environmental Management Zone.

Visual landscape / aesthetic value – A visual landscape analysis in the enclosed JBA Planning Report finds that the subject site is:

- not visible from the west or south;
- not visible from the north other than from within a relatively narrow view corridor across Narrabeen Lagoon; and
- visible, but not prominent, in views from the east in the suburb of Wheeler Heights.

The visual landscape analysis in the enclosed JBA Planning Report demonstrates that the subject site does not have any special visual landscape or aesthetic value that warrants an E3 Zone or precludes an R2 Zone for detached housing.

Wetland buffers

The subject site does not contain any wetland or wetland buffer that constrains an R2 Low Density Residential Zone or that warrants an E3 Environmental Management Zone.

Slope (erosion hazard)

The topography of the subject site is described in the enclosed JBA Planning Report as a central mid-slope bench with a predominantly gentle to moderate 5° to 10° slope.

A specialist Geotechnical Assessment prepared by Douglas Partners supporting the enclosed JBA Planning Report finds there is no evidence of landslide, cliff line collapse or slope instability on the subject site. The assessment notes that the site has rock close to the surface with a high potential for erosion of the shallow sandy soil profile, and housing is developable with appropriate engineering practices.

The topography and geotechnical conditions of the subject site on a predominantly gentle to moderate 5° to 10° slope are not prohibitive to an R2 Low Density Residential Zone for new housing, and do not pose any special environmental significance or hazard to warrant an E3 Zone.

Designated wildlife corridor or core habitat

As noted above, a specialist Flora and Fauna Assessment prepared by Cumberland Ecology specifically for the surplus Cromer Golf Club land and used in the enclosed JBA Planning Report finds that there is:

- no threatened flora species or EECs on the site;
- no evidence of threatened fauna on the site;
- limited habitat significance on the subject site given the above and the extent to which the vegetation communities are represented in the area.

Flooding

The subject site does not contain any flood prone land that constrains or poses a risk to housing in an R2 Low Density Residential Zone or that warrants an E3 Environmental Management Zone.

Acid sulphate soils

The subject site has no evidence of acid sulphate soils that would constrain an R2 Low Density Residential Zone or warrant an E3 Environmental Management Zone.

Threatened species habitat

As mentioned above, the subject site is not identified as containing a threatened or rare community in the Significant Vegetation Constraints Land Map in the Draft Strategic Review, and further the specialist Flora and Fauna Assessment prepared by Cumberland Ecology for the site finds that there is no threatened flora species or EECs on the site, no evidence of threatened fauna on the site, and limited habitat significance on the site. The specialist Flora and Fauna Assessment demonstrates that the vegetation on the subject site does not exhibit any special ecological, scientific, cultural or aesthetic value that warrants an E3 Zone or precludes an R2 Low Density Residential Zone.

2.2 Assessment of Secondary Environmental Constraints, Infrastructure and Planning Considerations

The secondary environmental constraints and planning considerations methodology used in the Strategic Review includes the following:

- Isolated and constrained;
- Physical and human infrastructure;
- Cultural Heritage;
- Bushfire;
- Proximity to centres;
- Proximity to public transport;
- Availability to connect to water, sewer and electricity;
- Telecommunications buffer;
- Riparian corridor;
- Significant vegetation;
- Wildlife Corridor and Core Habitat;
- Threatened Species;
- Flooding; and
- Wetland Buffers

An assessment of the secondary constraints and considerations relating to the subject site based on the detailed findings in the specialist environmental planning studies supporting the enclosed JBA Planning Report is provided below.

Isolated and constrained

The subject site is adjacent to an established residential zone and associated infrastructure, and it is not isolated to warrant an E3 Zone. The location of the subject site adjacent to an existing residential neighbourhood is suitable for an R2 Low Density Residential Zone.

Physical and human infrastructure

The subject site is adjacent to the physical and human infrastructure in the established residential suburb of Cromer and the northern beaches as described in the enclosed JBA Planning Report which shows the community infrastructure in the area including schools, child care, parks, beaches, clubs and community centres, police stations and medical facilities. The location of the subject site with its proximity to physical and human infrastructure in the locality is suitable for an R2 Low Density Residential Zone.

Cultural Heritage

A specialist aboriginal archaeological assessment of the subject site prepared by Mary Dallas supports the enclosed JBA Planning Report and finds that there are no aboriginal sites or objects found in field survey or documented on the subject site to warrant an E3 Zone or preclude an R2 Low Density Residential Zone.

Bushfire

A specialist Bushfire Assessment prepared by BES for the subject site supports the enclosed JBA Planning Report and was updated in 2009. The assessments demonstrate that the bushfire hazard in bushland to the north is not prohibitive to an R2 Low Density Residential zoning on the subject site, and that appropriate bushfire protection measures can be implemented to support housing on the site and also provide better bushfire protection for adjacent residential properties.

Proximity to centres

The subject site is located on the edge of the residential suburb of Cromer approximately 1.5km from two neighbourhood centres and the industrial zone at Cromer, and 4km from the Dee Why major centre. The location of the subject site with its proximity to centres is suitable for an R2 Low Density Residential Zone in the same way as the existing R2 Zone on adjacent land.

Proximity to public transport

The subject site is identified within 400m of a bus stop in the Proximity to Public Transport Infrastructure Map in the Draft Strategic Review. The bus stops are for the 178 and E78 bus routes at Cromer which provide direct bus route to and from Dee Why town centre, Warringah Mall shopping centre and Sydney City. The location of the subject site with its proximity to public transport is suitable for an R2 Low Density Residential Zone.

Availability to connect to water, sewer and electricity

The specialist Engineering Assessment of Constraints and Opportunities for Rezoning prepared by the engineers Patterson Britton and Partners Pty Ltd and used in the enclosed JBA Planning Report finds that the full range of utility services (water, sewer, gas, electricity and telecommunications) are available adjacent to the subject site and can be extended to service housing on the site, particularly as the site is contiguous with an existing urban area. The availability of utility infrastructure contributes to the suitability of the subject site for an R2 Low Density Residential Zone.

Telecommunications buffer

The subject site is not known to be in any telecommunications buffer that would warrant an E3 Zone or preclude an R2 Low Density Residential Zone.

Riparian corridor

As mentioned in Section 2.1 above, the subject site is not identified in the Riparian Constraints Land Map in the Draft Strategic Review as having significant riparian zone or buffer that warrants an E3 Zone or precludes an R2 Low Density Residential Zone.

Significant vegetation, Wildlife Corridor and Core Habitat, and Threatened Species

As mentioned in Section 2.1 above, the subject site is not identified as containing a threatened or rare community in the Significant Vegetation Constraints Land Map in the Draft Strategic Review. Further, the specialist Flora and Fauna Assessment prepared by Cumberland Ecology supporting the enclosed JBA Planning Report finds that there is no threatened flora species or EECs on the subject site, no evidence of threatened fauna on the subject site, and limited habitat significance on the site given the extent to which the scrub and woodland communities are represented in the area. The assessment demonstrates with detailed specialist evidence that the vegetation on the subject site does not exhibit any special ecological, scientific, or biodiversity value or natural landscape value that precludes an R2 Low Density Residential Zone or that particularly warrants an E3 zone.

Andrew Wilson - Town Planning Consultancy Service

PIA Certified Practising Planner

The visual landscape analysis in the enclosed JBA Planning Report demonstrates that the subject site on the mid-slope bench with scrub and low woodland does not have any special visual landscape or aesthetic value that warrants an E3 zone and is not prohibitive to an R2 Low Density Residential Zone.

Flooding

The subject site does not contain any flood prone land that constrains or poses a risk to housing in an R2 Low Density Residential Zone or that warrants an E3 Environmental Management Zone.

Wetland Buffers

The subject site does not contain any wetland or wetland buffer that constrains an R2 Low Density Residential Zone or that warrants an E3 Environmental Management Zone.

4. SUMMARY AND CONCLUSION

This submission and the enclosed JBA Planning Report demonstrate with an evidence base of detailed specialist environmental planning studies that approximately 4.5ha. of the surplus Cromer Golf Club land is suitable for low density housing, and we request this subject site be zoned R2 Low Density Residential in Warringah LEP 2011. The subject site is not found to exhibit any 'special ecological, scientific, cultural or aesthetic value' or significant 'natural landscape' value to meet the objectives of the E3 Environmental Management Zone. The site is physically capable of supporting housing development without unreasonable environmental impacts or risks, and is in a location with existing infrastructure and a level of accessibility to centres and public transport suitable for low density urban housing.

The proposed R2 Low Density Residential Zone on the subject site is consistent with the adjoining land to the south which had more significant constraints and was previously rezoned by the NSW Government for low density housing in the 1990's. The proposed R2 Zone on the subject site would facilitate the development of new detached houses to make a modest, but not insignificant, contribution to the supply of housing choices on the northern beaches of Sydney to meet housing demand. It would also facilitate continued environmental management on Cromer Golf Course including substantive water conservation measures and formalised public access around the foreshore of Narrabeen Lagoon.

The table on the following page provides a summary of findings from the specialist environmental planning studies used in the enclosed JBA Planning Report against all of the primary and secondary environmental constraint criteria in the Draft Strategic Review demonstrating the merit of an R2 Low Density Zone on the subject site and its limited environmental value for an E3 Zone.

If you have any queries about this submission or would like to discuss it further, please contact me on awplanning@outlook.com or on 0412 575 942.

Yours sincerely



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Environmental Constraint Criteria used in Draft Strategic Review	Summary of Findings for Subject Site in Specialist Environmental Planning Studies Used in Enclosed JBA Planning Report
Primary Constraint	
Riparian	No riparian zone or buffer.
Significant vegetation	No threatened flora species or communities and no evidence of threatened fauna. Limited habitat significance as vegetation is well represented in the area. No special visual landscape or aesthetic quality due to limited visibility of land from surrounding areas.
Wetland buffers	No wetlands or buffers.
Slope	No steep slope or evidence of land instability.
Designated wildlife corridor / core habitat	No threatened flora species or communities and no evidence of threatened fauna. Limited habitat significance as vegetation is well represented in the area.
Flooding	No flood prone land.
Acid sulphate soils	No evidence of acid sulphate soils.
Threatened species habitat	No threatened flora species or communities and no evidence of threatened fauna. Limited habitat significance as vegetation is well represented in the area.
Secondary Constraint	
Isolated and constrained land	Site is adjacent to an established urban area and is not isolated.
Physical and human infrastructure	Physical and social infrastructure available in the surrounding urban area.
Cultural Heritage	No Aboriginal sites or objects found in field survey or documented, and no known European heritage.
Bushfire	Bushfire hazard is not prohibitive to housing with appropriate bushfire protection measures.
Proximity to centres	Proximity to centres is commensurate with low density housing.
Proximity to public transport	Public transport within 400m is suitable for housing.
Availability to connect to water, sewer and electricity	Utility services are available from adjacent residential neighbourhood.
Telecommunications buffer	No known telecommunications buffer.
Riparian corridor	No riparian zone or buffer.
Significant vegetation Wildlife Corridor and Core Habitat Threatened Species	No threatened flora species or communities and no evidence of threatened fauna. Limited habitat significance as vegetation is well represented in the area.
Flooding	No flood prone land.
Wetland Buffers	No wetlands or buffers.