

28 July 2020

The Chief Executive Officer
Northern Beaches Council
Attention: Ms Lashta Haidari

Development Application DA2020/0484
Additional Information Response
Frenches Forest Bushland Cemetery

BBF Town Planners are instructed by our client, Northern Metropolitan Cemeteries Land Manager, to submit this additional information in support of the subject Crown Development Application. This responds to questions from the Sydney North Planning Panel that were communicated in an email from Council on 26 June 2020. The documents accompanying this submission, and referenced herein, are provided electronically in PDF file format. These include:

- Appendix 1: Group GSA Combined Constraints Mapping
- Appendix 2: Chapel Site Area Constraints
- Appendix 3: Additional Plans - Landscape Architect – Road Reserve Planting
- Appendix 4 - Options Analysis of Potential Chapel Locations

1 Information requested by the Sydney North Planning Panel

The information requested by the Sydney North Planning Panel, as communicated to my client, is copied below:

'The issue of the location of the Chapel building was raised. The asked for full analysis and justification to be provided as to why the chapel building cannot be located elsewhere in the site, if that the analysis found that this was the most suitable location, then are asking If the building could be moved (at all) towards the north to increase the front setback.

Again if they are convinced that this the most suitable location for the chapel building, they are also wanting more Landscaping within the site and possibly within road reserve to further screen the development.

The also wanted to know if there is a Plan of Management for the site in accordance with the Cemeteries and Crematoria Act 2013, particularly the provision of Plan of Management – Link below. If there is Plan of management for the site then we will need to know how this development accords with the Plan of Management for the site'.

The following submission seeks to provide answers to the above questions.

Additional information

2 Site characteristics needed for the Chapel

A successful chapel building that is fit for its purpose and valued by the community requires certain physical and spatial characteristics for it to function appropriately, meet its intended purpose and the satisfy the needs of the community. In summary, the chapel location requires the following characteristics:

1. Approximately 1,900 to 2,000 square metres of flat or moderately sloping land (see Figure 1 below).
2. 45 conveniently located car parking spaces which accommodates the carparking demand for the majority of funeral services.
3. Pedestrian accessibility – short, walkable distances, and pedestrian gradients between the Chapel, the function / administration centre, and on-site car parking.
4. A cleared area of land so as not to adversely impact upon sensitive vegetation, including some areas of Ecologically Endangered Communities, and the established bushland character of the property.
5. Remote from bushfire prone areas of land within the site.
6. The availability of utility services such as electricity, water supply, and wastewater disposal.
7. Visitor legibility so that the Chapel and function / administration centre is easily found by mourners attending funerals and visitors to the cemetery.
8. Separation of the Chapel and function centre from current burial areas within the site to provide privacy and dignity for people attending a burial – these areas are in the northern part of the site.
9. An appropriate arrival experience that is supportive of the process one goes through as part of an appropriate, structured, and dignified mourning experience (detailed within the Architectural design statement accompanying the DA).

3 Options analysis of the proposed Chapel location

3.1 Constraints Layer Mapping Analysis

The submission is accompanied by constraints layer mapping (Appendix 1) that illustrates the relevant physical and environmental constraints (and their spatial extents) that are applicable to the property. The constraint layers include:

1. Biodiversity, bushland vegetation, riparian land, and stormwater
2. Bushfire prone land
3. Geology of the land
4. Topography of the land
5. Established interments
6. Planned interments
7. Fit-for-purpose considerations including proximity to car parking and accessible pedestrian gradients as discussed in section two above

Matters relating to biodiversity, bushland vegetation, riparian land, stormwater, bushfire prone land, and the land's geology have been addressed within the Statement of Environmental Effects and the accompanying expert reports. Further geological considerations are described

below in relation to the suitability of the land for burial interments which is a key consideration for the purpose of the property.

Eight locations within the 22ha property have been reviewed for their potential suitability to accommodate a chapel of the size and scale needed, along with its associated facilities including porte-cochere and hearse manoeuvring spaces, storeroom, mortuary, outdoor gathering space, and landscaped setting. The attached table and mapping layers detail the various locations along with the advantages and disadvantages of each.

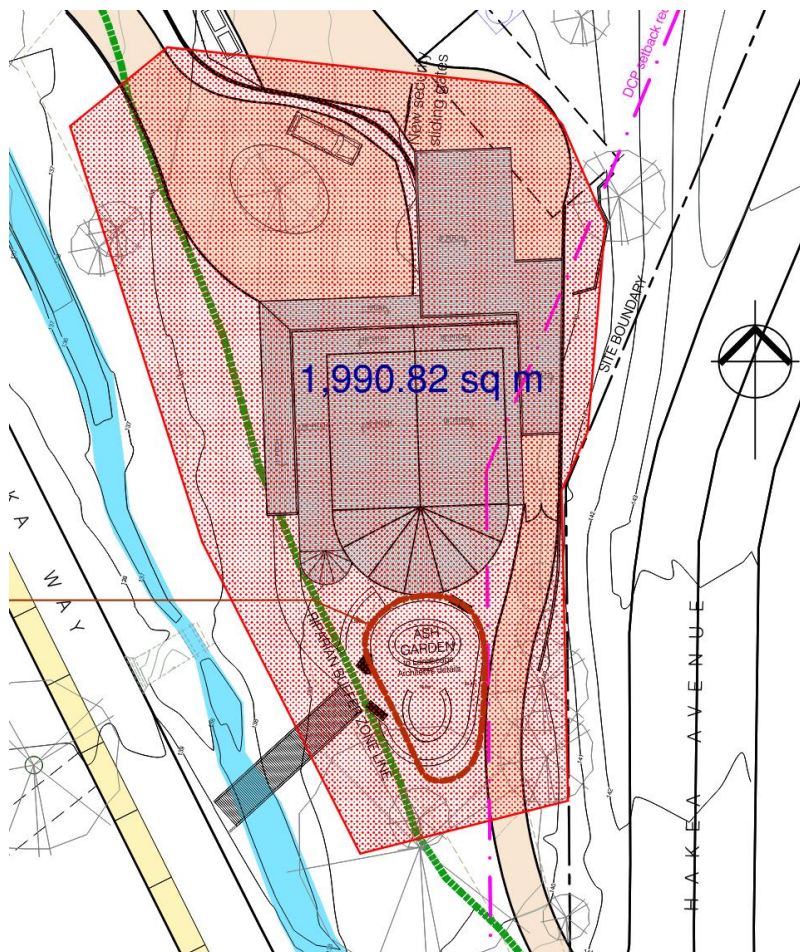


Figure 1 - Approximately 1,900 to 2,000 square metres of land is needed to accommodate the proposed development

3.2 Geology needed for burial interments

In relation to the site's geological conditions, much of the property has a shallow bedrock foundation which is unsuitable for burial interments. Typically, an interment depth of 2200 mm is required to achieve double interment burials (current practice). Not only is such excavation expensive, it also creates noise and dust disturbance which adversely impacts on the local amenity. For these reasons, such areas on the property are excluded for future burial interments use.

The geotechnical investigation report conducted by JK Geotechnics (lodged with the DA), highlighted that the cemetery sits on top of Hawkesbury Sandstone comprising of medium to coarse grained quartz sandstone, very minor shale and laminate lenses. The borehole tests

carried out also verified the presence of shallow sandstone. Hawkesbury Sandstone bedrock was encountered from depths of 1.4m (BH201) to 2.9m (BH203), (JK Geotechnics, page 6,) in the area in which the Chapel is proposed.

This information verifies that the proposed location of the Chapel is not suitable for interment purposes (due to the shallow sandstone depth) but represents efficient and effective use of the land for an ancillary cemetery function. Furthermore, due to the severe shortage of burial land within the Metropolitan Sydney it would be inappropriate and contrary to the provisions of the aims of the Cemeteries Act to locate the chapel on land that is appropriate and designated for burial interments.

3.3 Justification of the proposed Chapel location

Based on the constraints layer mapping analysis, the location of the proposed Chapel building is assessed as the most suitable location upon the site to accommodate such an addition and is justified upon the following grounds:

1. The Chapel's proposed location near the established vehicle entry to the site.
2. Through demolition of an unused caretaker's cottage the proposed location minimises land clearing, tree removal, and negative impacts on EEC.
3. Negative impacts on EEC are minimised by the Chapel's proposed location.
4. As the Constraints Layer Mapping Analysis demonstrates, there are no contiguous areas of sufficient land within the site of a suitable size to accommodate the proposed Chapel building and its associated elements (storage room, mortuary, vehicle turning areas, viewing room, gathering area, etc). Conversely, the Chapel's proposed location has the appropriate land area and topography to accommodate the development.
5. The Chapel's proposed location utilises the amenity of the existing creek line and proposes to enhance this feature delivering social and environmental benefits.
6. The Chapel's proposed location has access to 45 conveniently located car parking spaces within to accommodate the carparking demand for the majority of funeral services.
7. Pedestrian accessibility – short, walkable distances, and pedestrian gradients between the Chapel, the function / administration centre, and on-site car parking.
8. The Chapel's proposed location avoids bushfire affected land within the property.
9. The Chapel's proposed location makes use of a area of the site where the geology is unsuitable for burial interments due to the shallow depth of sandstone foundations.
10. The Chapel's proposed location avoids impacting upon both established and planned interments and therefore is in accordance with the aims of the Cemeteries and Crematoria Act 2013, one of which is to '(c) to ensure that sufficient land is acquired and allocated so that current and future generations have equitable access to interment services'.
11. The location provides clear access between the Chapel and function / administration centre due to its proximity to the Cemetery's main entrance, arrival / departure point.
12. The Chapel's proposed location enhances and augments the existing arrival experience to the cemetery with the Chapel being visible from the main entry and Hakea Avenue facilitating way finding for visitors to the property. Within the broader landscape of the cemetery, it is intended for the Chapel become an appropriate focal point for visitors as part of the cemetery's functions.

3.4 Wider strategic planning grounds

In addition to the site-specific justifications described above, the Chapel's proposed location is justified upon wider strategic planning grounds. The chapel is proposed in a location on the site that makes efficient use of zoned cemetery land which is consistent with established community need and government policy.

Demand for burial space is high and land supply (zoned and unzoned) is limited within the Greater Sydney Metropolitan Area. Establishment of new cemeteries is inherently difficult due to various environmental considerations, the large land area needed, and the scarcity of suitable land within the Greater Metropolitan Area of Sydney in proximity to established communities.

The 'Metropolitan Sydney Cemetery Capacity Report' (November 2017 by Cemeteries and Crematoria NSW) has been adopted by the NSW State Government and provides a detailed strategic analysis that demonstrates that there is strong demand and need for cemetery land, having regard to population projections, the capacity of existing cemeteries, and the anticipated operational lifespan of existing cemeteries.

Despite the fact that supply shortages are forecast to arise from 2050, no additional land within the Northern Beaches area or North District has been identified, zoned or set aside for future cemetery use. Higher utilisation of the Frenchs Forest Bushland Cemetery makes a positive contribution to meeting future burial demand in this part of Sydney. The report is referenced within the 'Greater Sydney Regional Plan – A Metropolis of Three Cities – Connecting People (March 2018 updated). It outlines the delivery and long-term direction for cemeteries and crematoria infrastructure as part of 'Direction 1.11: Deliver infrastructure', and the associated 'Action 1.11.5: Deliver long-term planning for cemeteries and crematoria infrastructure'.

It is therefore justified that the Crown Land Manager optimises the utilisation of the land which the siting of the proposed Chapel achieves. The above considerations provide environmental planning grounds in justification of the proposed Chapel's location on the property.

4 Why the chapel building cannot be located elsewhere in the site?

Based on the above, the proposed Chapel cannot be located elsewhere in the site principally because there are no other contiguous areas of land that satisfy the physical and spatial characteristics required. These characteristics are profiles within Section 2 of this submission.

5 Can the chapel be moved (at all) towards the north to increase the front setback?

The proposed Chapel cannot be moved towards the north to increase the front setback without resulting in significant redesign of the proposed Chapel for the following key reasons:

1. hearse manoeuvring
2. the location of the existing maintenance building
3. the location of established large native eucalypt trees
4. the irregular shape of the proposed Chapel site and the cemetery's eastern boundary

Notwithstanding, as detailed below, additional landscaping provision has been considered and can be provided to assist in enhancing the eastern edge of the property and screening the proposed Chapel building.

6 Landscaping within the site

Consideration has been given to providing more landscaping within the site and possibly within road reserve to further screen the development.

The application is accompanied and supported by landscaping plans (Appendix 3 – Road Reserve Planting) which propose a retaining wall within the boundary of the cemetery land to provide a suitable area with flatter gradient for the planting of native vegetation along the eastern edge of the proposed Chapel development. The landscape plans demonstrate that a suitable and effective planting strip can be established that will enhance the development of the site as viewed within the streetscape.

This proposal will involve no capital cost to Council, with the responsibility for maintaining the retaining wall being borne by the Crown land managers. A condition may reasonably be imposed to give effect to this outcome.

7 Plan of Management for the site

There is currently no approved Plan of Management for the site under the provisions of the Subdivision 4 of the Cemeteries and Crematoria Act 2013.

Section 93 of the Act states that the Cemeteries authority may require the land manager to prepare a plan of management. In this instance, this hasn't been requested by the Cemeteries Authority. Notwithstanding, the Northern Metropolitan Cemeteries Land Manager has been preparing a masterplan for the property as reflected in the document submitted for information purposes with the DA prepared by Group GSA architects and urban designers. It reflects the current stage of the masterplan's development. The development of the Chapel proposed as part of the subject DA is entirely consistent with the draft masterplan for the site.

8 Conclusion

Based on the above, the questions from the Sydney North Planning Panel, as communicated within Council's email dated 26 June 2020, have been appropriately responded to. In our considered opinion the application as provided appropriate consideration and responses to the questions raised and there remain no outstanding issues or impediments to the approval of the application.

Should you need to clarify any matters, I welcome you to contact me at 0408 663 971 or michael@bbfplanners.com.au.

Yours sincerely,



Michael Haynes
Director - BBF Town Planners