

---

**From:** Peter Harley OAM  
**Sent:** 12/03/2025 2:57:25 PM  
**To:** Council Northernbeaches Mailbox  
**Subject:** TRIMMED: Friends of Freshwater Submission for DA2025/0077  
**Attachments:** 17021201.PDF;

Attention Planning Assessor Max Duncan


Please find attached our submission to the above DA

Yours Faithfully

--

**Best regards**

**Peter Harley OAM**  
**Executive Member**  
**Friends of Freshwater Inc**  
**4 Marmora St. Freshwater Beach. 2096**  
**NSW. Australia**



## Submission

DA2025/0077

Attention: Max Duncan, Planning Assessor

The Friends of Freshwater Executive on behalf of its membership has given serious consideration to this DA for such a landmark and important consolidated site in Freshwater Village. It has been anticipating this application for some years since the consolidated site was purchased from the previous owner, who had, in turn, lodged a DA which was never activated.

The previous owner had also left the various holdings poorly maintained and in need of redevelopment

It is pleasing that the current owner has seen fit to utilise CHROFI, a well-regarded local architectural firm, familiar with the Freshwater locality and landscape. It has previously provided expertise on the Watermark development and the Soldiers Avenue of Honour Master Plan (*approved by Council in 2014*)

The Lawrence St. sites have a deceptively long and steep slope which make it difficult to get continuity of design in terms of bulk and height.

For any development of these sites, the major obstacle is access to underground parking. We have always advocated that this should be from the current Dowling St entrance. This DA follows that objective and creates a ramp on its southern boundary that extends from the west to the eastern extremity of the site. This provision of parking, to accord with the requirements of the LEP, will require extensive excavation of up to 2.5 floors.

## **Parking**

The DA has a deficiency of 17 car spaces which will need to be met. We view car parking provision in Freshwater Village and elsewhere as a very serious matter given the gradual removal of on-street parking in Lawrence Street over the years. A fundamental principle of the existing LEP2011 is to bolster on-street parking with underground parking. This DA provides that opportunity.





## **Sustainability**

We note that the DA has included significant environmental upgrades from the BASIX minima. These include the following:

- Roof solar panelling
- EV charging facilities with fire safety provisions
- Removal of all reticulated gas from the building and installation of induction cooktops in all apartments
- Rainwater recycling for use on landscaped areas and public toilets
- On site battery storage
- Inclusion of ceiling fans in all apartments.
- Brick facades that do not need painting

This is a major advance which we applaud and we note that the Design and Sustainability Panel Report has also made similar observations

## **Interaction with residential properties on the southern boundary.**

Inevitably, there will be concerns expressed by the residences on the southern side of Undercliff Road which needs to be respected and addressed. Issues such as overshadowing, reduced amenity in rear gardens and interaction with apartment balconies and windows, will need to be resolved.

## **Amenities**

The provision of a substantial floor to ceiling Plaza, midway along the site is a major improvement, not only for this site and its residents but for the Village and the local community as a whole. It will inevitably adjust the locus of the Village from the Freshwater Village Plaza and compensates for the loss of the current arcade

It is also pleasing to note the provision of public toilets and bicycle racks in the DA, as the Village has a deficiency in that regard with only the external closets in Pocket Park being available.

There will be a need for provision for a substantial Waste Collection facility for both the retailers and the apartment residences in this development

The Communal rooftop terrace is also a bonus amenity as it neatly fits into the slope of the site

## **Affordable Housing provisions**

This Development utilises the provisions of the of the legislated Affordable Housing concessions with respect to height and bulk. This has allowed the structure to go above the 11m provision specified in the LEP to 13.45m, which means one level of retail and 3 levels of residential. 3X 2 bedroom and 3X1 bedroom apartments will be permanently made available to residents who qualify under the Affordable Housing provisions in terms of their income. This is a bonus for local employers as some of their employees travel to work each day from distant locations. The Affordable Housing apartments are managed, not by the landlord but by an independent agency appointed by the Government.

The design of these 30 apartments have caused many to observe that the development is excessively bulky

## **Contamination of the Sub Strata**

For many years, Dry Cleaning businesses have been operating within these sites. Their intensive use of solvents may have seeped and contaminated the sub strata and need analysis. We note the refusal of the Environmental Health specialists on this issue

## **Tree Removal**

A tree on Dowling Street is planned for removal to enable the establishment of utilities. We regret the loss of this mature melaleuca and advocate that the Developer plant with NBC a similar tree at a suitable site up further on Dowling Street.

## **IN GENERAL**

We support the Application with the caveats on parking provision: the resolution of the concerns of the residents nearby in Undercliff Road, an additional tree; and removal of soil contamination from the sub strata

Yours Faithfully

**Denise Goldstein**  
**Dianna Ryall AO**  
**Co-Chairs**