
Sent: 17/08/2023 1:01:32 AM
Subject: DA2023/0995 at 52-54 Brighton Street, Freshwater
Attachments: DA2023-0995 52-54 Brighton St subm 20230816.doc;

Submission attached.

To: Northern Beaches Council
Email: council@northernbeaches.nsw.gov.au
Attention: Adam Croft
16 August 2023

DA2023/0995 Seniors housing
Address: 52-54 Brighton Street, Freshwater
Development proposal for seniors housing development incorporating eight (8) in-fill self-care housing units and basement car parking for 27 vehicles.

I object to the proposed development. Reasons include:

The proposal is an over-development of the site

The bulk and scale of the development greatly exceeds that of the surrounding low density area.

The attached dwellings have a combined frontage extending across two single front boundaries.

The wide frontage is inappropriate in this low density zone.

The proposed consolidation of lot size and building width may be appropriate in a medium density (R3) zone, but not the existing low density zone.

The proposal consists of two large blocks of units, with an East-West indent, linked together. The visual impact is an elongated building, with inadequate spatial separation, that dominates the surrounding low density area.

The wall height of 9.2m (variable) is 2m higher than the 7.2m (max) wall height of existing dwellings.

The double frontage with greenery draped over the balconies is no substitute for a landscape setting that allows space between dwellings.

The wide building frontage spans two adjoining lots and the design of the apartment building is not consistent with the detached style dwellings in the existing low density area.

The proposal does not consider the spaces between buildings consistent with the existing street.

The proposal does not conform to the existing pattern of development in the low density area.

The proposal includes an underground car park for 27 vehicles compared with est. 4 vehicles.

This large underground car park is out of character within the low density environment, and no underground car parking is currently located in the street.

The development poses a potential safety hazard for pedestrians and cyclists, including students attending the nearby Freshwater Senior Campus.

The site is within an overland flow path and the development would greatly reduce the landscape open space and infiltration of runoff within the site.

The relocated underground stormwater pipe to the east side and front setback limits the depth of soil for dense planting and trees.

The proposed excavation for basement car park extends across much of the site area. The excavation would impact on natural drainage regime and sub-surface flow.

Note: The Geotechnical Report is not included among the documents on public exhibition.

The proposed wall height is almost as high as the roof and results in a box-like appearance.

Kitchens and living areas that extend into outdoor balconies are a potential source of noise.

The proposal does not satisfy the following planning controls and guidelines:

SEPP (HOUSING) 2021

Floor Space Ratio

108 Non-discretionary development standards for independent living units—

(2) (c) the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,

Building Planes

84 Development standards—general

(2) Development consent must not be granted for development to which this section applies unless

(c) (iii) if the development results in a building with more than 2 storeys—the additional storeys are set back within planes that project at an angle of 45 degrees inwards from all side and rear boundaries of the site.

97 Design of in-fill self-care housing

SENIORS LIVING POLICY

URBAN DESIGN GUIDELINES FOR INFILL DEVELOPMENT

OVERVIEW

it is important to emphasise that all developments should adopt a contextual approach. That is, the design should respond to both neighbourhood and streetscape character...

1. RESPONDING TO SITE CONTEXT

Built environment:

Residential neighbourhoods are often consistent in terms of built form. This includes not only the size and shape of buildings but the spaces between them. It is important that new built form, as far as possible, follows these patterns.

3. IMPACTS ON STREETSCAPE

New infill developments need to achieve a harmonious fit with the existing streetscape character or desired future character.

Design principle

Respond to the desired streetscape character by:

– locating and designing new development to be sympathetic to existing streetscape patterns (building siting, height, separation etc.)

4. IMPACTS ON NEIGHBOURS

Site analysis should reveal the existing spatial relationships between adjacent dwellings in an area, and provide clues for reducing potential impacts.

Built form:

▫ Design the relationship between buildings and open space to be consistent with the existing patterns in the block:

Protect neighbours' amenity by carefully designing the bulk and scale of the new development to relate to the existing residential character...

WARRINGAH LEP 2011

Zone R2 Low Density Residential

Objectives of zone

- To provide for the housing needs of the community within a low density residential environment.
- To ensure that low density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah.

WARRINGAH DCP 2011

Wall Heights

DCP Control B1

7.2m maximum wall height for R2 low density zone.

Minimise the impact of development on adjoining or nearby properties.

The proposed development has a variable wall height of up to 9.2 m

Excavation and Landfill

DCP Control C7

Excavation and landfill works must not result in any adverse impact on adjoining land.

Building Bulk

DCP Control D9

Minimise the visual impact of development when viewed from adjoining properties and street.

EP&A ACT 1979

4.15 Evaluation

(b) The likely impacts of that development, including environmental impacts on both the natural and built environments and social and economic impacts in the locality,

Context and Setting

i. What is the relationship to the local context in terms of:

- The character and amenity of the locality and streetscape
- The scale, bulk, height, mass, form, character, density, and design of development in the locality

In conclusion, the proposed development will have an adverse impact on the character and amenity of the low density locality and streetscape, including the public domain, and should be refused.

Ann Sharp