
From: Iona Williams
Sent: 26/06/2023 4:25:53 PM
To: Council Northernbeaches Mailbox
Subject: DA2023/0647 submission response 13 ALLEYNE AVENUE, NORTH NARRABEEN, NSW 2101
Attachments: Scan 9.pdf; PastedGraphic-4.tiff;

26 june 2023

Dear Jordan Howard,

Planner

RE: DA2023/0647 PROPOSED ALTERATIONS AND ADDITIONS

TO AN EXISTING DWELLING AT

13 ALLEYNE AVENUE, NORTH NARRABEEN, NSW 2101

LOT 46 DP 7593

Please find following a response outlining neighbourhood issues of concern in relation to the proposed new works:

Extension of the existing timber deck to be replaced with a new wider timber deck and roof.

Extension of the roof form by a new 2-degree pitch Colorbond roof over the new deck extension.

Proposed new external stairs, allowing access from the deck to the rear backyard.

As there is concern that contrary to the conclusion in the SEE, prepared by JJ Drafting Aust p/l, there are indeed considerable detrimental impacts on the neighbour's adjoining property.

So that the objectives of Council's controls are not achieved by this proposal.

By way of adversely impacting and exacerbating the *visual privacy issues* for neighbours.

Whilst the *visual impact* in terms of bulk and scale caused by the lack of sensitive response to the natural topography and consideration of the existing built forms and alignments is also negatively impacted upon by the proposal.

As it lacks compatibility with existing bulk and scale.

Additionally, there are issues regarding the *accuracy of the solar access* diagrams and the impact on the neighbouring home as a consequence of this proposal.

Issues presented:

Visual Privacy (C1.5)

Contrary to the conclusions stated in the SEE that: "There will be no affect to adjoining properties in privacy loss."

There will infact be a very adverse affects to adjoining properties in terms of privacy loss.

Please note that the documents (SEE & Dwg. set). do not provide the critical dimensions required for the exact measurement for the extent of the proposed deck's width past that of the existing deck. Only an amalgamated width for the total new deck of 3500mm (DA 07)

(Whilst scaling off the drawings reveals the extent of the new deck to be 4400mm.)

Nor are there any clear measurements on any of the sectional drawings for the actual new additional width proposed. eg.DA11 (which completely omits any critical horizontal measurements and only has vertical measurements provided).

Not even a width for the proposed new stairs is provided which should be shown for compliance with Australian standards for external staircases.

While DA08 only provides a depth measurement of 2500mm for the proposed new roof on the plan above the rear deck extension plan.

Additionally the only measurement for the 'wider' deck given in the SEE is:

Existing Rear setback Ground Floor Deck—————14m

New Rear setback Ground Floor New Deck-----13.870m

(Which only equates to 130mm. Which is clearly not the case.)

Pittwater DCP 21 clearly states:

Direct views of private open space Pittwater DCP 21 (C1.4)

(Source: AMCORD 1995)

that: "Direct views of private open space or any habitable room window within 9m can be restricted by:

vegetation/landscaping

a window sill height 1.7 metres above floor level, or

offset windows

fixed translucent glazing in any part below 1.7 metres above floor level, or

solid translucent screens or perforated panels or trellises which have a maximum of 25% openings.

Additionally, **Pittwater DCP 21 (C1.5)**

states: "locate balconies to avoid overlooking."

But none of these issues or measures to ameliorate the visual impact on the adjoining private open space has been considered in the proposal.

Please refer to the Proposed Built Form Visual Impacts Dwg. No. 1

Pittwater LEP 4.3 height of buildings (2D) where the land slopes.

So that the built form responds sympathetically to the existing topography and the visual impact is substantially reduced.

But the effects of the height and extra bulk and scale of no.13 (designed as an almost sheer 3 storey 'wall' of built form) obviously does not take into account the slope of the land by 'breaking' up the bulk to 'step down the slope'.

Whereas the neighbour's home at No.15 is far more appropriately designed and sited as it 'steps down the slope' (while also creating a more 'earth sheltered' and energy efficient home).but by doing this it is adversely impacted by the adjoining proposal that does not account for natural slope of the land.

Nor does the proposal does take any other measures to reduce its visual impact.

While the proposed new roof and the proposed verandah extension will also protrude way past the existing built form alignment pattern established by the neighbouring properties.

Building Facades (C1.5)

Outcomes:

Improved visual aesthetics for building facades.

The proposal does not represent any improved visual aesthetics. As it does not 'break down' the scale of the proposal or alleviate the lack of proportion of the very prominent new extension.

North Narrabeen Locality (A11)

Desired future character

and Character as viewed from a public place (D11.1)

Not only will the deck contribute further to visual privacy and bulkiness of the extension, but also the *bulk of the new staircase* will also contribute to visual impacts.

And will only be made worse if the staircase is also extended any further past the existing building's rear alignment.

Since the new deck (RL 38.51) will be 3.01 metres above Ground level (RL 35.5) which already represents a considerably big staircase to accommodate this height difference.

Solar Access (C1.4)

It is not clear by the minimal shadow diagrams provided in the DA set (DA 17 and DA18) if "No loss of daylight to habitable rooms in adjacent dwellings will be experienced as consequence of this proposal.

Or that adjoining dwellings will receive a minimum of 3 hours of sunlight between 9am and

3pm.”

As there does not seem to be enough evidence to support that the sun angles provided take into account the much lower altitude of the winter sun.

As only the sun's azimuth angle appears only to be depicted and not the sun's reduced height for these times.

Since, the sun's elevation is considerably lower in winter and drops to only 33°.

But the sun's lower altitude does not appear to be considered for the proposed new extension's extreme height difference above the neighbour's habitable spaces nor the substantial slope of the land; as a factor contributing to overshadowing issues.

Therefore more evidence needs to be provided that the sun angles are not just for a flat site with adjacent building floor levels at the same heights as the proposal's - when in reality there is a considerable height difference of 3 stories.

Eg. the new roof extension (RL 41.42 - at the gutter and the new proposed new wall with balustrade above - no RL supplied)

And the adjacent dwellings will therefore be at least *7.17 metres higher* than the adjoining private open space at No.17 (RL 34.25) and 6.97 metres higher than the ground floor levels. (RL 34.45)

And 4.27 metres **higher** than the adjoining First Floor habitable living spaces (RL 37.15) .

And exacerbated further especially since the proposal is due west of the neighbouring home.

Additionally the shadow diagrams are of such a small scale it is doubtful that they are very accurate in any case.

4.3) Height of Building (LEP 4.3)

The maximum building height control - 8.5m

The proposed alteration and additions exceed the 8.5m building height – and do NOT COMPLY.

As the ridge height of the existing dwelling at No. 13 (RL 45.39) is already exceeding the maximum building height as it is 10.02 metres above the ground level (RL 35.37)

Information to be included in the Statement of Environmental Effects

The SEE for the proposed extension does not comply with Council's requirements that state: "An analysis outlining how the proposal achieves an acceptable level of privacy for residents and users and protects the privacy of any adjoining development."

Since this information should be provided and clearly this DA makes no attempt to ameliorate the adverse impacts as they simply ignore and otherwise do not even acknowledge the adverse impacts.

At the very least there should have been some effort to provide some kind of visual 'screening'.

While **Pittwater DCP 21 (C1.1)**

landscaping changes to external appearance (C1.1)

Requires a Landscaping plan where a proposal :

“ involves changes to the external appearance, or increase the footprint of an existing building and / or

... causes any substantial change to the visual character of the site.”

But the Landscape plan in the SEE is NOT a Landscape plan.

It is just an area calculations plan and is totally inadequate as a Landscape Plan and should not be labelled as a 'Landscape Plan.'

Summary

5.0) DEVELOPMENT STANDARDS AND THE EFFECTS OF THE PROPOSAL

Pittwater 21 Development Control Plan

The proposed development does not respond to the characteristics of the site and the qualities of the surrounding neighbourhood in a sympathetic and positive manner.

As it is not compatible and will not complement the character of the area.

So that any further additions to the existing bulk and scale in the proposal will adversely dominate the locality's existing residential and natural character.

As it already protrudes past the established built form alignment and should not go any further.

And will set a new precedent for encroachment past the built form line that will only *increase visual privacy issues* for adjoining properties.

Additionally there are detrimental impacts to the visual privacy and overlooking caused to the neighbouring property at No.15 caused by the extent of the rear deck's height, bulk and scale.

If you have any questions relating to this submission, please do not hesitate to contact me either by phone or e-mail.

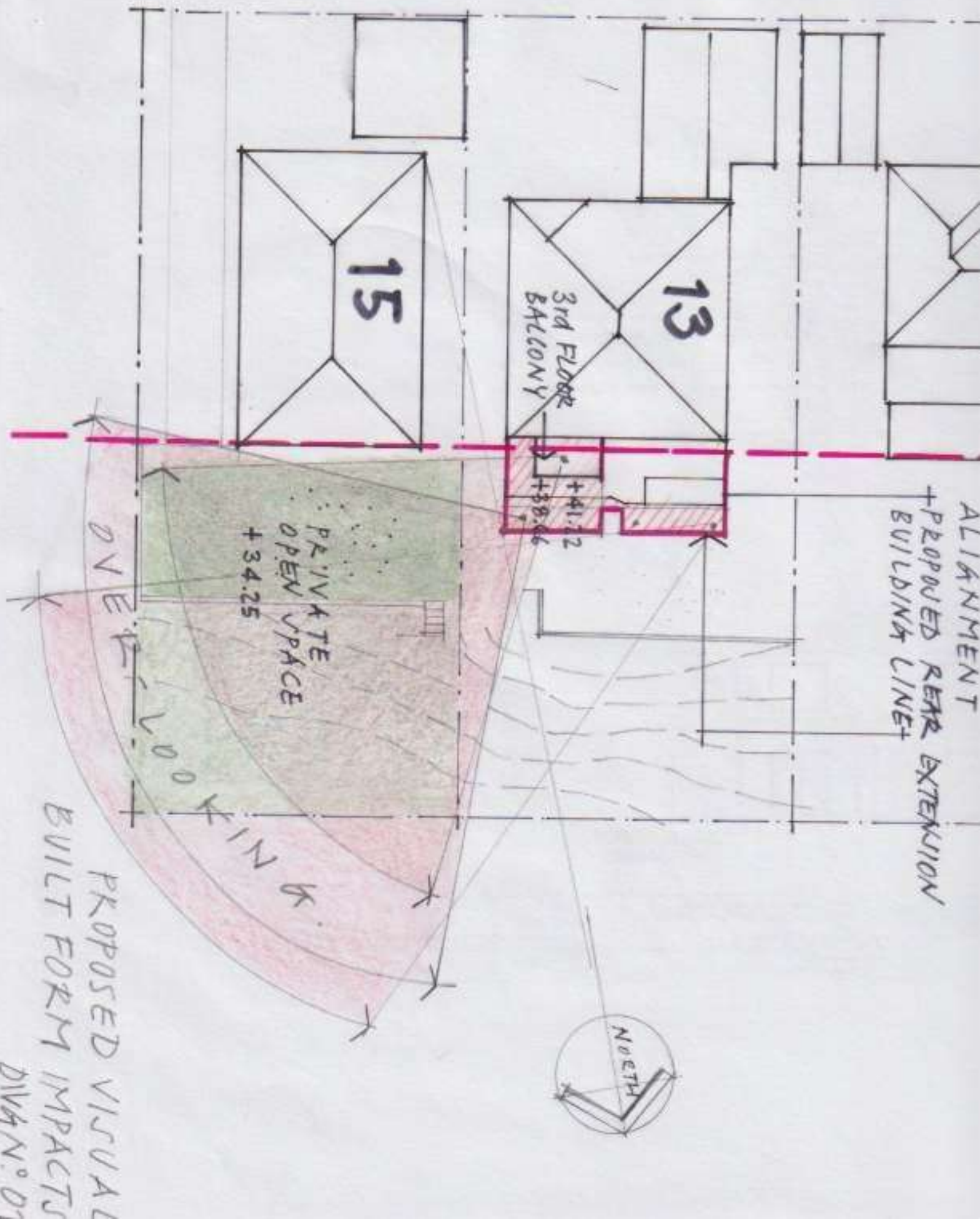
Kind regards,

Iona Williams
B.Arch (hons) B.L'Arch (hons)

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ALLEYNE AVENUE



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