
From: Dale Branch
Sent: 20/04/2022 3:08:49 PM
To: Council Northernbeaches Mailbox
Cc: Janelle Branch; Steve Branch
Subject: 816 Pittwater Road, Dee Why - Submission on (DA2022/0145)
Attachments: 220420 - Final Submission - 816 Pittwater Rd (Reduced).pdf;

Dear Council,

Please find the attached submission in relation to DA2022/0145 which is on exhibition until today (20th of April 2022).

Please attention this email to Adam Mitchell who is the assessing officer for this application.

If any further information is required, please do not hesitate to contact me at the following:

Dale Branch


20 April 2022

Mr Ray Brownlee
Chief Executive Officer
Northern Beaches Council
PO Box 82
MANLY NSW 1655

Attn: Planning Assessment Officer

RE: Submission – DA2022/0145 – 4 Delmar Parade and 812 Pittwater Road, Dee Why

This submission has been prepared in relation to DA2022/0145 (the application) at 4 Delmar Parade and 812 Pittwater Road, Dee Why (the site). It has been prepared on behalf of the owners of the adjacent lot to the north and west of the site at 816 Pittwater Road (see **Figure 1**). DA2022/0145 seeks approval for demolition works and the construction of a mixed-use development comprising a five and seven storey residential building above two common basement levels (the Proposal).

We have reviewed the documentation accompanying the development application and raise our strong objection to the application for the following reasons.

- The Proposal demonstrates a lack of appropriate response to the site's constraints and is overdevelopment, proven by the requirement for three separate variations to built form development standards (Clause 4.6).
- The Proposal relies on 816 Pittwater Road remaining undeveloped to achieve fundamental amenity requirements of residential flat development, as demonstrated in the documentation submitted with the DA. This approach is fundamentally flawed and cannot be supported.
- The Proposal does not comply with the required building separation under the ADG and relies on 816 Pittwater Road remaining undeveloped to achieve compliance with ADG solar access provisions.
- Setbacks from the shared boundary (north of 812 Pittwater Road) for proposed residential apartment building do not achieve SEPP 65 compliance. The dwellings that directly face the boundary are required to be set back a minimum of 9m or reorientated to face east rather than north. The proposal would need to be significantly redesigned to achieve compliance in this regard, separate from solar access compliance.
- A superior urban outcome would be achieved by amalgamating the site with 816 Pittwater Road.
- The Proposal is inconsistent with Council's desired character for Dee Why Town Centre as a vibrant mixed-use centre. Most significantly, the Proposal is inconsistent with the objectives for development within Dee Why Town Centre provided in Clause 7.3 of the *Warringah Local Environmental Plan 2011* (Warringah LEP). Accordingly, development consent **must not** be granted per Clause 7.4 of the Warringah LEP.

The DA is accompanied by three separate clause 4.6 variations to built form (both FSR and podium height) and land use development standards, an indication that the scheme as submitted, is an overdevelopment of the site. The variations are required, in part, as a result of the site configuration and the applicant's decision not to amalgamate.

Because of these reasons, the application is unacceptable in its current form. We recommend that the development application be refused. Whilst amalgamation of site would provide a better outcome, it is important to note that 816 Pittwater Road is entirely capable of development, provided the adjoining site (particularly Building B on 812 Pittwater Road) is designed to comply with requisite planning controls. 816 Pittwater Road should not be relied upon by the proposal to achieve ADG and solar compliance.

The applicant has made the choice not to amalgamate the sites, and the burdening of 816 Pittwater Road is unreasonable. The resulting non compliances and clause 4.6 variations in the DA are issues that have been caused by the applicant, which represent an over development of their site with no basis for justification. These issues can be resolved by a reduction in proposed development responsive to the constraints of the site, or amalgamation.

The applicant should be required by Council to reconsider amalgamation with 816 Pittwater Road or revise their design, so it does not inhibit that site's economic and orderly development.

1.0 Background

Over the last 24 or so months, the owners of 816 Pittwater Road have negotiated an option for the applicant to purchase their site to be included in the development. However, after agreeing on a price, executing a term sheet and proceeding to contracts, they renegotiated on a number of items, and the transaction fell through.

Principally, the renegotiations put forward by the applicant resulted in a call option which significantly shifted the risk onto the landowner in a way which departed significantly from the term sheet which had previously been agreed.

The landowner is still open to an amalgamation of the sites, subject to an equitable arrangement being reached.

The amalgamation of the site and 816 Pittwater Road would resolve the issues presented in the introduction by:

- Enabling the orderly and economic development of both sites; and
- Providing the Proposal with larger frontage to Pittwater Road, thus enabling the development to comply with the maximum permitted FSR, and the Warringah LEP objectives for the Dee Why Town Centre.

Nevertheless, in the event that amalgamation is not achieved, the Proposal should be redesigned so it does not inhibit the economic and orderly development of 816 Pittwater Road as a standalone development site.

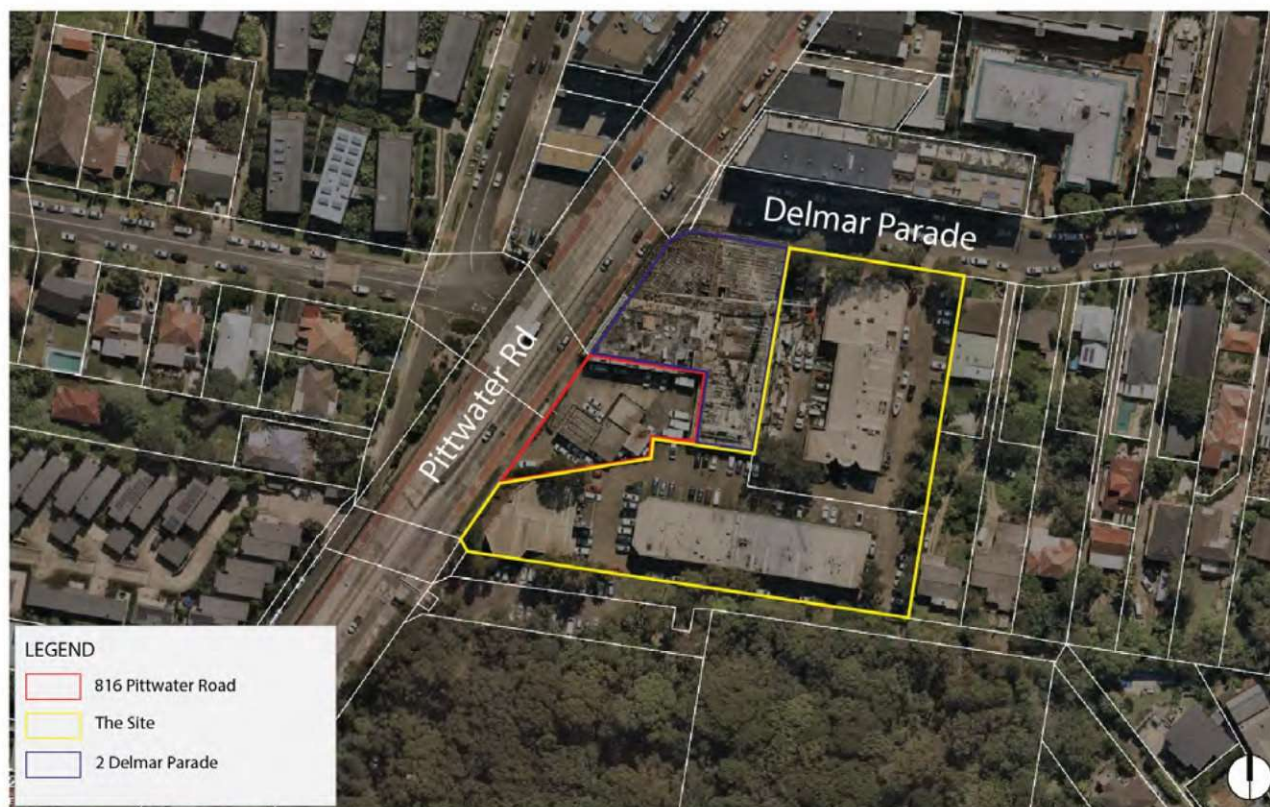


Figure 1 Site Location Diagram showing the site of the DA in yellow.

Source: Nearnmap

2.0 Design, Site Analysis and Non-Compliances

2.1 Solar access

The ADG requires that living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours of direct sunlight between 9 am and 3 pm at mid-winter. As commented in the SEPP 65 Statement that accompanies the application, the Proposal suggests that exactly 70% of proposed apartments receive the required two hours of solar access to living room windows and private open space. Of these compliant apartments, it is understood that approximately seven north-facing apartments per level in building B rely on 816 Pittwater Road remaining undeveloped to achieve compliance (see **Figure 2**). No detailed breakdown, or diagrams have been provided with the application to confirm the validity of the suggested compliance.

Contrary to the accepted approach to planning in areas undergoing transition, LEC planning principles and case law; the Proposal gives no regard to the existing or likely future development of 816 Pittwater Road when considering amenity of the proposed development. Council and the Regional Planning Panel cannot knowingly support a DA that relies on the vacancy of an adjoining site, within a key centre of the LGA on a major roadway, to support a case of compliance and good planning outcomes.

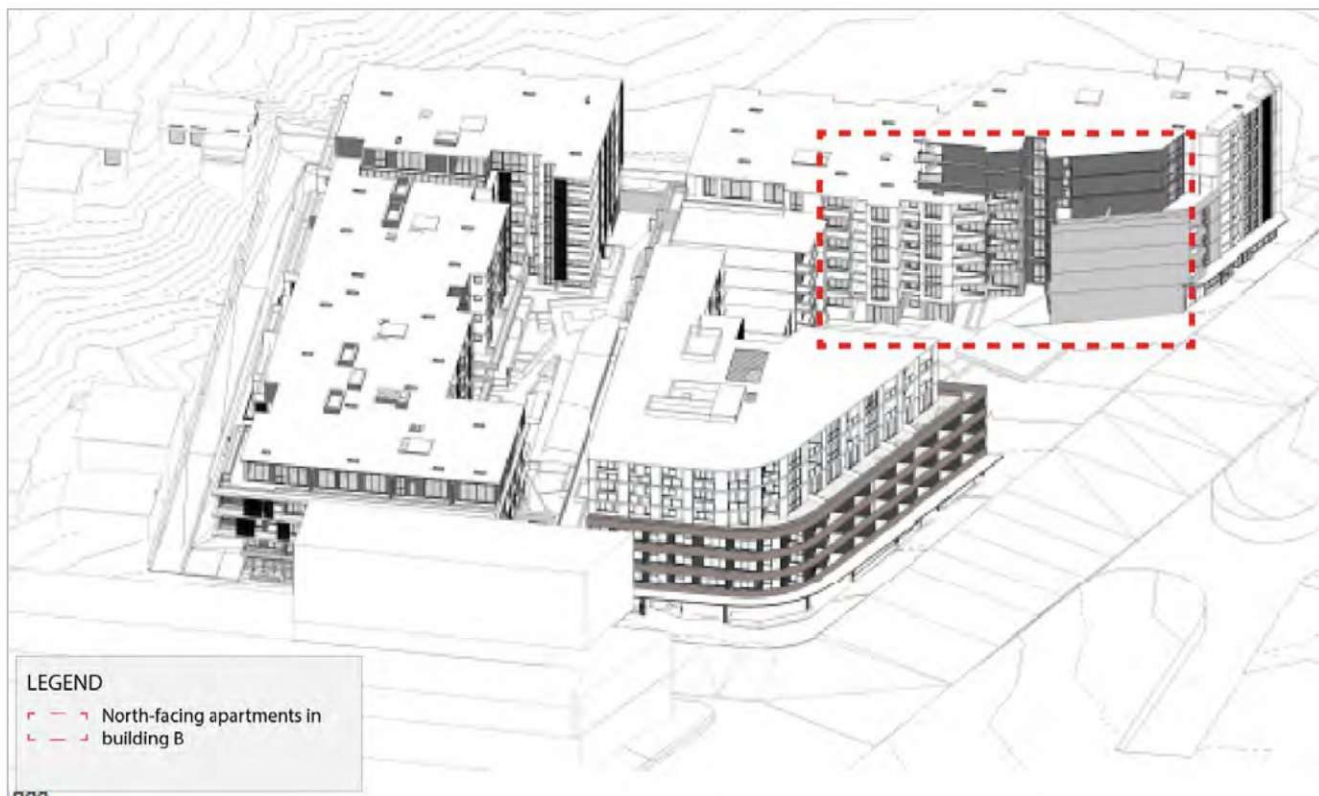


Figure 2 North-facing Apartments in Building B

Source: Rothelowman

Consequently, any development of 816 Pittwater Road would result in the Proposal no longer achieving compliance with the ADG on the measure of solar access, aside from privacy. This is evident in **Figure 3**, which provides an outline of the allowable built form at 816 Pittwater Road (24m height and 3.2:1 FSR).

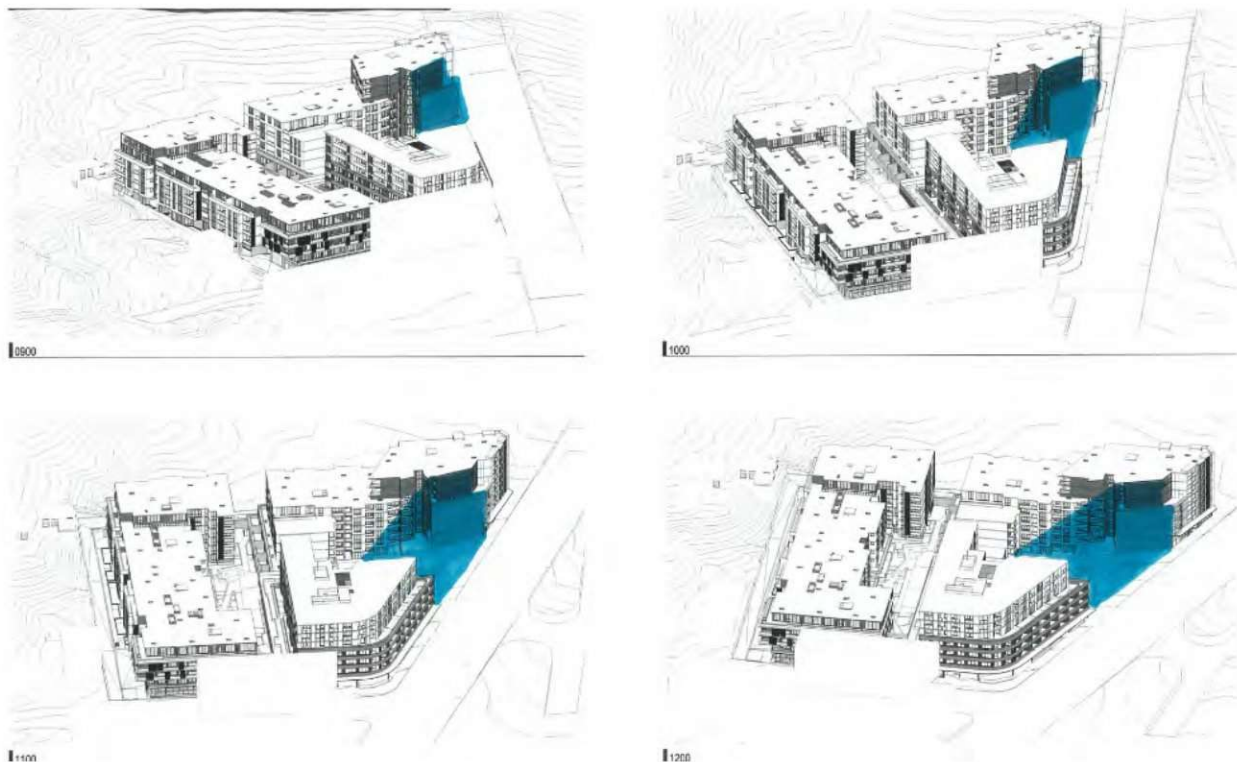


Figure 3 Solar Access to Building B with 816 Pittwater Road Developed to its Planning Controls

Source: Base image: Rothelowman with markup in blue showing the

As mentioned above, the Proposal's impact on the developability of 816 Pittwater Road is a relevant consideration as well as the impact of a future development on the site. As established in *The Benevolent Society v Waverley Council* [2010] NSWLEC 1082 (previously the *Parsonage v Ku-ring-gai* planning principle), "in areas undergoing change, the impact on what is likely to be built on adjoining sites should be considered when assessing the adequacy of solar access". It is apparent that this has not been given any regard.

As with the proposed building separation and provision of suitable setbacks to enable areas in transition, the impacts of overshadowing to the Proposal have not been appropriately considered and set up a substandard planning outcome for both No 812 and the future development of 816 Pittwater Road.

Furthermore, in *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191, Senior Commissioner Rosseth established that a proposal's impact on the development potential of surrounding sites is a relevant consideration when assessing a project's compatibility with its surrounds. The case provides guidance when considering the compatibility of a proposal with its local area.

In order to test whether a proposal is compatible with its context, the case law suggests that two questions should be asked.

- Are the proposal's physical impacts on surrounding development acceptable? The physical impacts include constraints on the development potential of surrounding sites.
- Is the proposal's appearance in harmony with the buildings around it and the character of the street?

The answer to both questions for the Proposal is no. The impacts of the current proposal on the development potential of 816 is unacceptable. Whilst the appearance of the Proposal from Pittwater Road may be considered in harmony with 2 Delmar Parade, the interface of the development No 816 is not in harmony and sets up a substandard development when future development at No 816 does occur in the future.

2.2 ADG Site separation

The ADG requires a minimum 6m separation between residential buildings to side boundaries for up to four storeys and 9m for levels 5 to 8 (assuming between non-habitable rooms). Furthermore, the minimum separation between residential buildings is 12m between habitable rooms and balconies for up to four storeys and 18m for levels 5 to 8. As shown in the below extract, the Proposal provides a 3.3m and 6m setback (with windows and balconies) between habitable north-facing balconies of levels 5 to 7 and the shared boundary with 816 Pittwater Road.

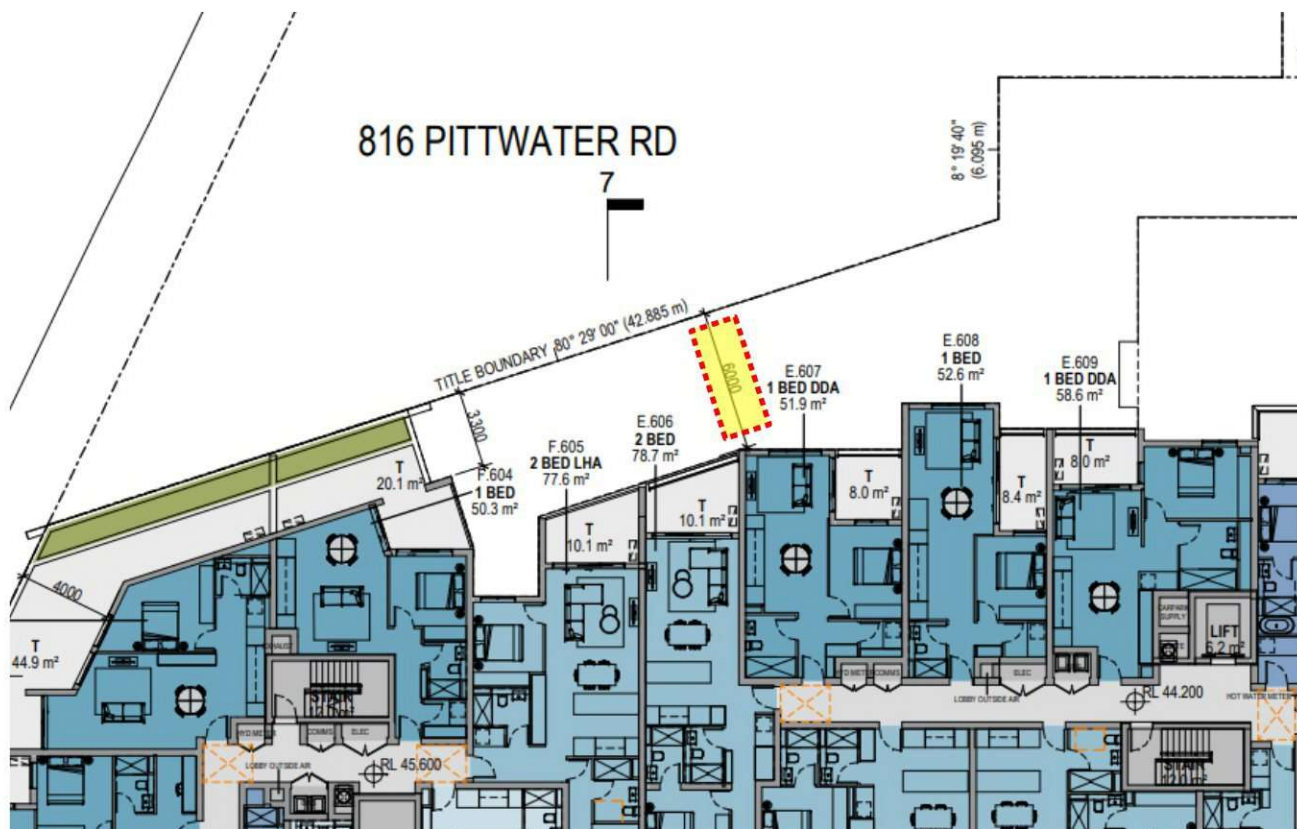


Figure 4 Proposed Building Separation – Level 5 of Building B

Source: Rothelowman

In order to comply with the ADG, the north-facing dwellings in Building B would need to be set back by a minimum of 9m or reorientated to face east (parallel with the northern boundary alignment) rather than north to achieve compliance with the ADG and provide for the orderly and economic development of 816 Pittwater Road. Without doing so, a poor planning outcome would be foreshadowed, placing an unreasonable burden on any future redevelopment of 816 Pittwater Road to provide excessive and onerous building setbacks to achieve required building separation distances. As shown in **Figure 5** below, approximately three apartment units would be lost on each level for a residential flat building developed at 816 Pittwater Road due to these onerous building setbacks.

Whilst an argument could be made that future development would not necessarily require full adherence to separation requirements being offset or perpendicular to one and other, perpetuating a scenario that requires this issue and others (privacy, acoustics, overshadowing) to be dealt with offsite at no 816 Pittwater Road is a substandard and poor planning outcome. This is further exacerbated by the Proposal seeking to vary development standards, including a 29% exceedance on 812 Pittwater Road – an indicator of overdevelopment and lack of response to site constraints (including required setbacks).

In accordance with the aims of the ADG for building separation, application should “ensure that new development is scaled to support the desired future character with appropriate massing and spaces between buildings”. Where areas are in transition from low density or other uses to increased density, half of the separation distance should be applied in the form of a setbacks to allow for the other half of the separation requirement as the sites transition to be equitably accommodated on the adjoining site. Whilst the ADG acknowledges that separation compliance may not occur until both sides are developed, it does not propose that when a site is transitioning to a new scale it should reduce the setback and separation to unreasonably burden the future adjoining development.



Figure 5 Undevelopable Portions (Highlighted Yellow) of 816 Pittwater Road due the Proposal's ADG Building Separation Non-compliances

Source: Base image: Rothelowman, markup of compliant separation in yellow. Indicative layout required to respond to proposed development shown on 816 Pittwater Road.

Again, this inhibits the orderly and economic use and development of 816 Pittwater Road. Compounded by the approval of the previous DA at No 2 Delmar Pde, the theoretical building envelope of 816 Pittwater Road would be unreasonably and unnecessarily curtailed, as a direct result of a poor design outcome and lack of response to site constraints (including likely future development) in the current DA.

If the proposed development was approved in its current format, the consequences would be

- Building B's eventual significant non-compliance with the solar access provisions of the ADG when 816 Pittwater Road is developed, and
- An eventual non-compliance with the building separation provisions of the ADG between Building B and 816 Pittwater Road, or
- The prevention of the orderly and economic development of 816 Pittwater Road within the intended planning controls.

Both outcomes are unacceptable.

2.3 Design Excellence

The Proposal in its current format fails to demonstrate design excellence, reliant solely on an outcome that appears to presume no future development on No 816 Pittwater Road.

Despite the commentary provided in the Statement of Environmental Effects, the Proposal does not demonstrate design excellence within the Dee Why Town Centre for the following reasons.

- The Proposal's massing and meditation give little to no regard for the anticipated built form of development at 816 Pittwater Road, and by association, the area's character.
- The Proposal does not demonstrate a high standard of architectural design by proposing an inappropriate and poor response to the circumstances and constraints of the site, particularly at the northern interface of 816 Pittwater Road.
- The proposed development maximises solar access only through the inappropriate suggestion to obtain compliance over 816 Pittwater Road with no regard to the future development as intended.
- The proposed communal spaces and private open spaces on the northern elevation of 816 Pittwater Road are not exemplary or innovative and will be overshadowed entirely by the future development of 816 Pittwater Road.

3.0 Inconsistency with Dee Why Town Centre's Desired Character

The Proposal is significantly inconsistent with the Council's desired character for Dee Why Town Centre as a vibrant mixed-use centre as articulated by the Northern Beaches Local Strategic Planning Statement (LSPS), Part 7 of the Warringah LEP and Part G1 of the Warringah DCP. **Table 1** further below demonstrates the Proposal's many non-compliances with the principles, controls and clauses of these strategic and statutory documents that guide the Town Centre's vision.

Most significantly, the Proposal is inconsistent with the objectives for development within Dee Why Town Centre provided in Clause 7.3 of the Warringah LEP. Specifically, the Proposal:

- Does not balance its provision of housing with a mix of retail, business, employment, civic, cultural and recreational uses as required by Clause 7.3(b)
- Does not provide two levels of non-residential development (including the ground floor) to accommodate additional employment opportunities as required by Clause 7.3(j). Instead, it only proposes three smaller commercial tenancies across its two ground levels. with most of these floors proposed for residential apartments. Evidently, this contravenes the numerical standard set by Clause 7.3(j).

Clause 7.4 of the LEP stipulates the following regarding development that is inconsistent with the objectives in Clause 7.3:

*(1) Development consent **must not be** granted to development on land in the Dee Why Town Centre unless the consent authority is satisfied that the development—*

(a) is consistent with the objectives of this Part that are relevant to that development. [emphasis added]

Accordingly, as the Proposal is inconsistent with the objectives of Part 7 of the Warringah LEP (Clauses 7.3(b) and (j)), development consent **must not** be granted. While the Proponent submitted a Clause 4.6 variation request for the Proposal's non-compliance with Clauses 4.2, 6.7 and 7.6A(2) of the Warringah LEP.

The reasons for the Proposal's failure to provide two levels of employment-generating floorspace are indicated in the Statement of Environmental Effects that accompanied the application. It suggests that providing commercial floor space on the ground floor is unviable as the site is supposedly disconnected from the commercial core of the Dee Why Town Centre and has a limited frontage to Pittwater Road and Delmar Parade.

"...the subject site is at the periphery of the centre and is largely disconnected from the commercial core of the centre. As a result, commercial floor space on the ground floor of the internal areas of the development is not commercially viable and only commercial tenancies with a street frontage will have a chance of succeeding in this location at the edge of the centre." (SEE, pg. 26)

While the site is on the edge of the Dee Why Town Centre, the Town Centre's commercial and retail uses extend to the site. Indeed, the under-construction mixed-use development at 2 Delmar Parade, which adjoins the site, contains only commercial and retail floorspace on its ground floor.

Table 1 Non-Compliances the Dee Why Town Centre Intended Character

| Principles / Clause / Control | Compliance |
|---|--|
| Northern Beaches LSPS - Principles for the Dee Why Town Centre | |
| Support Dee Why as a mixed centre for business, community, civic and residential uses | Non-compliance The Proposal fails to provide a mix of business, community and civic uses that support Dee Why as a major centre. |
| Provide at least two levels of non-residential uses for employment. | Non-compliance The Proposal only provides three smaller commercial tenancies across its two ground levels, with most of these floors proposed for residential apartments. |
| Warringah LEP - Zone B4 Mixed Use Objective | |
| 1 Objectives of zone • To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling. | Non-compliance Despite the site being well-served by public transport, the Proposal fails to provide a mix of business, office and retail uses that would benefit from and contribute to public transport patronage. |
| • To promote a land use pattern that is characterised by shops, restaurants and business premises on the ground floor and housing and offices on the upper floors of buildings. | Non-compliance The Proposal only provides three smaller commercial tenancies across its two ground levels, with most of these floors proposed for residential apartments. This is inconsistent with the land use pattern |
| Warringah LEP - Part 7: Dee Why Town Centre | |
| 7.3 Objectives for development within Dee Why Town Centre | |
| The objectives of this Part are as follows – | |
| (b) to ensure a balance between the provision of high quality housing with a mix of retail, business, employment, civic, cultural and recreational facilities, | Non-compliance The Proposal fails to balance the provision of housing with a mix of retail, business, employment, civic, cultural and recreational uses. |
| (j) to accommodate additional employment opportunities, service functions and space for business, consistent with the role of Dee Why as a major centre, by providing at least 2 levels (including the ground floor) of development for non-residential purposes, | Non-compliance The Proposal only provides three smaller commercial tenancies across its two ground levels, with most of these floors proposed for residential apartments. |
| Warringah DCP - Part G1 : Dee Why Town Centre | |
| 5. Design and Architectural Diversity Requirements – Tower Setbacks 1. Development is to maintain minimum tower setbacks from the kerb as outlined in Figure 5. (9m) | Non-compliance The tower setback from the Pittwater Street kerb for 'Building B' appears to be significantly less than the required 9m. |

4.0 Development Potential of 816 Pittwater Road

The Site at 816 Pittwater Road is capable of being developed to achieve the anticipated built form and density of the site in Council's endorsed planning controls. However, as outlined in this submission, the proposed development will inhibit the orderly and economic use and development of 816 Pittwater Road, 'taking' its amenity from 816 Pittwater Road and unreasonably transferring a burden on any future development of 816 Pittwater Road as set out below:

- The Proposal relies on 816 Pittwater Road remaining underdeveloped to achieve compliance with the solar access provisions of the ADG for approximately seven dwellings per level in Building B. If 816 Pittwater Road were developed, the Proposal would no longer achieve compliance with the ADG. This severely limits the ability for 816 Pittwater Road to be developed to its allowable built form.
- Building B of the proposal does not comply with the ADG 6m setback criteria for levels 1 to 4 and 9m setback criteria for levels 5 to 7 to the shared boundary between the site and 816 Pittwater Road. This places an unreasonable burden on any future redevelopment of 816 Pittwater Road to provide excessive and onerous building setbacks to achieve required building separation distances. As described, approximately three apartment units would be lost on each level of a residential flat building developed at 816 Pittwater Road due to onerous building setbacks.

The SEE suggests that the issue of isolation has been suitably addressed because vehicle access alternative from Pittwater Road were considered and inspired in the DA for 2 Delmar Parade. The SEE infers that because of this point alone, with no commentary on any other impacts, 816 Pittwater Road can "*independently and reasonably developed and therefore is not an isolated site*". This methodology is erroneous and misleading. The Proposal provides no analysis of the likely future development of 816 Pittwater Road, other than what appears to be broad scale massing in the Urban Design Report.

Complaint setbacks and portion of separation in accordance with the ADG are required in the proposal to ensure that appropriate development can occur on 816 Pittwater Road, and not required the onus to be transferred to address separation at a later stage.

If the current proposal was to be supported, 816 Pittwater Road would likely remain significantly underutilised as an isolated AVIS car hire shop that detracts from the intended character of Dee Why as a mixed-use major centre. As described in **Section 5.0**, the applicant should be instructed to either consider amalgamation with 816 Pittwater Road or revise their design, so it does not inhibit the economic and orderly development of 816 Pittwater Road as a standalone development site. Both options would result in a better urban outcome than 816 Pittwater Road remaining as an AVIS car hire shop or its development resulting in significant solar access and building separation ADG non-compliances.

5.0 Proposed Alternative

As demonstrated throughout this letter, the Proposal in its current form is unacceptable as:

- a. It is inconsistent with the Council's desired character for Dee Why Town Centre, as demonstrated by its many non-compliances with the Northern Beaches LSPS, Part 7 of the Warringah LEP and Part G1 of the Warringah DCP; and
- b. It will inhibit the orderly and economic use and development of 816 Pittwater Road.

The solution to the above issues is either the amalgamation of the site and 816 Pittwater Road **or** the Applicant revises their Proposal to provide a 9m building setback to the shared site boundary and account for solar impacts associated with the development of 816 Pittwater to its development potential. This may involve reorientating apartments in Building B.

Concerning amalgamation, Commissioner Tour in *Karavellas v Sutherland Shire Council* [2004] NSWLEC 251 provides the following general questions when dealing with the amalgamation of sites or when a site is isolated through redevelopment:

- *Firstly, is amalgamation of the sites feasible*

- *Second, can orderly and economic use and development of the separate sites be achieved if amalgamation is not feasible.*

Regarding the second question, this submission clearly demonstrates that the Proposal will inhibit the orderly and economic use and development of 816 Pittwater Road due to solar access and building separation. Development at 816 Pittwater Road that is consistent with the site's planning controls (24m height and 3.2:1 FSR) will become unachievable, as demonstrated in **Figures 3** and **5** which would require setbacks as per ADG on 812 Pittwater Road to maintain compliance.

In addition to enabling the economic and ordered development of 816 Pittwater Road, amalgamation would also deliver the following benefits in the public interest:

- The Proposal's distribution of built form and massing could be extended into 816 Pittwater Road to resolve the Proposal's significant non-compliance with the maximum permitted FSR 3.2:1 along Pittwater Road. The Proposal's current variance from the development standard (+1.12:1 or 28.6%) is only being sought to maximise the building envelope fronting Pittwater Road.
- The development site would benefit from a substantially increased Pittwater Street frontage (20m to 65m) that would enable to proponent to deliver commercially viable floor that is consistent with Dee Why Town Centre's desired character. It would also enable the development to meet the following objectives of the B4 mixed use zone:
 - *To promote building design that creates active building fronts, contributes to the life of streets and public spaces and creates environments that are appropriate to human scale as well as being comfortable, interesting and safe.*
 - *To promote a land use pattern that is characterised by shops, restaurants and business premises on the ground floor and housing and offices on the upper floors of buildings.*
- Building height could be rearranged from Building B to 816 Pittwater Road to further reduce overshadowing impacts on the Heritage Conservation Area to the site's south without a reduction in yield. It is noted from the referral provided to the DA, Council's heritage department currently does not support the application due to impacts on the Heritage Conservation Area.
- A larger site area would provide additional space to rearrange the Proposal, enabling a dedicated waste truck access point and a larger waste room and bulky goods room. This would also address the concerns raised by Council's waste team.

Site amalgamation is also consistent with the objectives of the B4 mixed use land use zone and 'Part D8 - 6. Site Amalgamation' of the Warringah DCP.

6.0 Conclusion

The planning principles in *The Benevolent Society v Waverley Council* [2010] NSWLEC 1082 and *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191, establish that the Proposal's impact on the developability of 816 Pittwater is a relevant consideration when assessing the application. When considering both of the planning principles and case law, the objectives and controls in the LEP (including the 3 x clause 4.6 variation) and inadequate and unaddressed non-compliances with the ADG and DCP, the proposal in its current form cannot be supported by Council.

This submission clearly demonstrates that the Proposal will inhibit the orderly and economic use and development of 816 Pittwater Road, consistent with its planning controls (24m height and 3.2:1 FSR) for the following two reasons.

1. The Proposal relies on 816 Pittwater Road remaining underdeveloped to achieve compliance with the solar access provisions of the ADG for approximately seven dwellings per level in Building B. If 816 Pittwater Road were developed, the Proposal would no longer achieve compliance with the ADG.
2. Building B does not comply with the ADG 6m setback criteria for levels 1 to 4 and 9m setback criteria for levels 5 to 7 to the shared boundary between the site and 816 Pittwater Road. This places an unreasonable burden on any future redevelopment of 816 Pittwater Road to provide excessive and onerous building setbacks to achieve required building separation distances.

The Proposal is inconsistent with the objectives for development within Dee Why Town Centre provided in Clause 7.3 of the *Warringah Local Environmental Plan 2011* (Warringah LEP). Accordingly, development consent **must not** be granted per Clause 7.4 of the Warringah LEP.

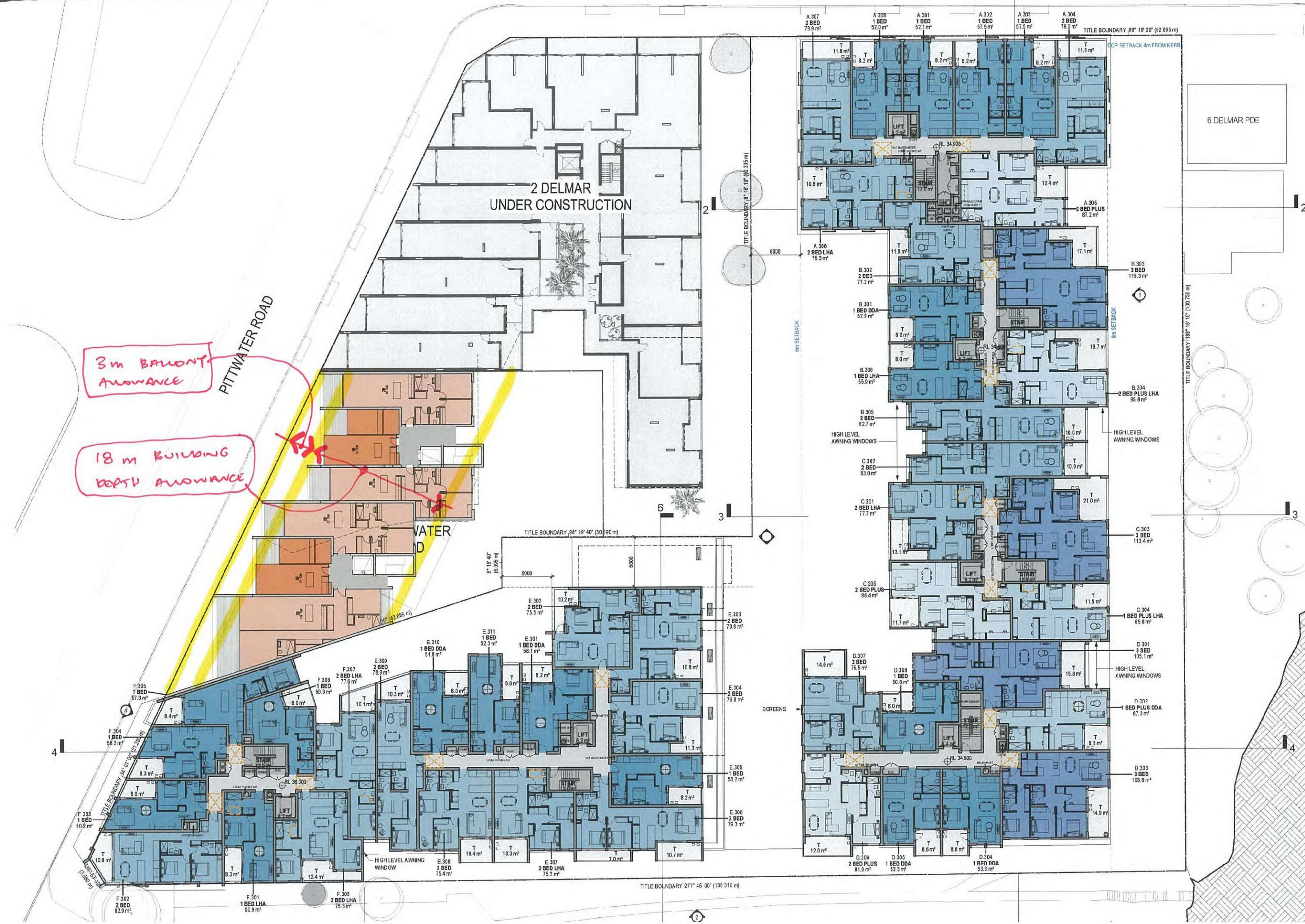
In order to resolve the above issues, the application must be revised to provide adequate separation (9m setbacks) on the site to comply with the ADG. The setbacks of Building B must also be revised to account for the solar impacts associated with the development of 816 Pittwater to its development potential as anticipated by the combined development controls. This may involve reorientating apartments in Building B.

We trust this submission will be considered and any response or additional information be provided to us so it can be reviewed, and any further comments made. Should you have any questions, please don't hesitate to contact the author of this letter.

Yours sincerely,
Dale Branch
For and On Behalf of Fineoak Pty Ltd
The Landowner of 816 Pittwater Road

BUILDING ENVELOPE

DELMAR GARAGE



SOUTH ORIENTATION

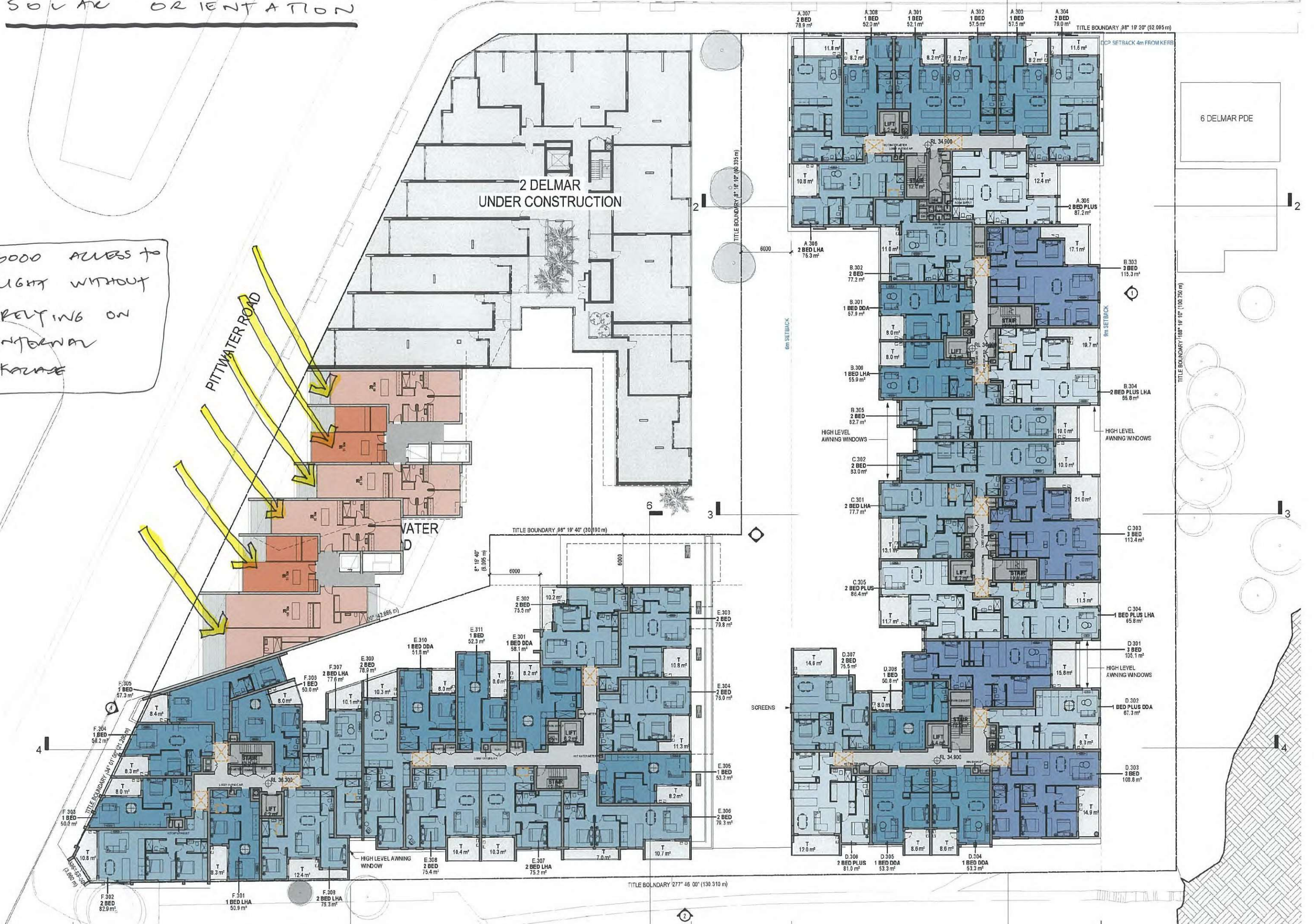
GOOD ACCESS TO LIGHT WITHOUT RELYING ON INFORMAL KANAL

PITTSWATER ROAD

2 DELMAR UNDER CONSTRUCTION

PITTSWATER ROAD

6 DELMAR PDE



CROSS VENTILATION



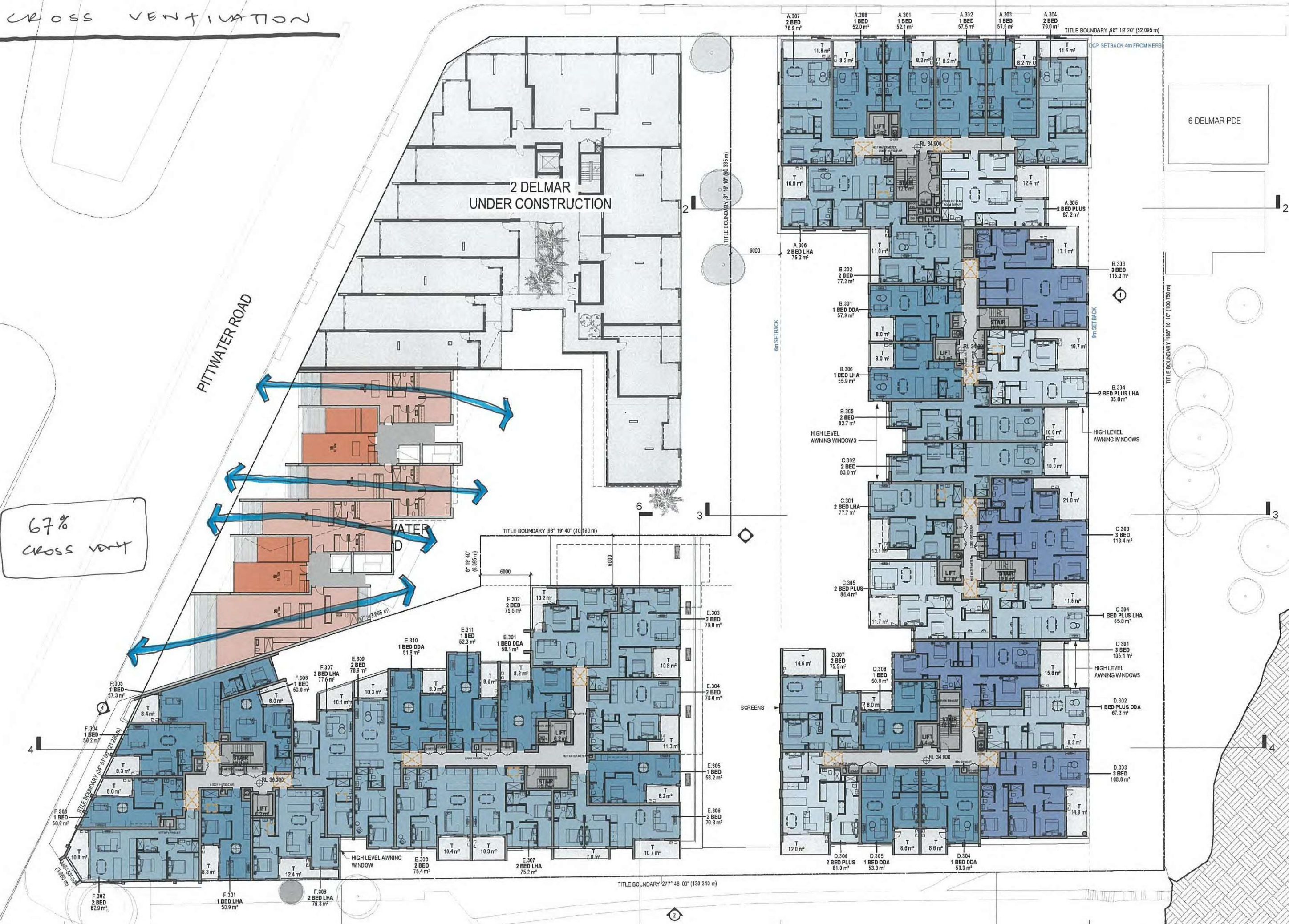
67%
cross vent

PITTWATER ROAD

2 DELMAR
UNDER CONSTRUCTION

WATER

6 DELMAR PDE

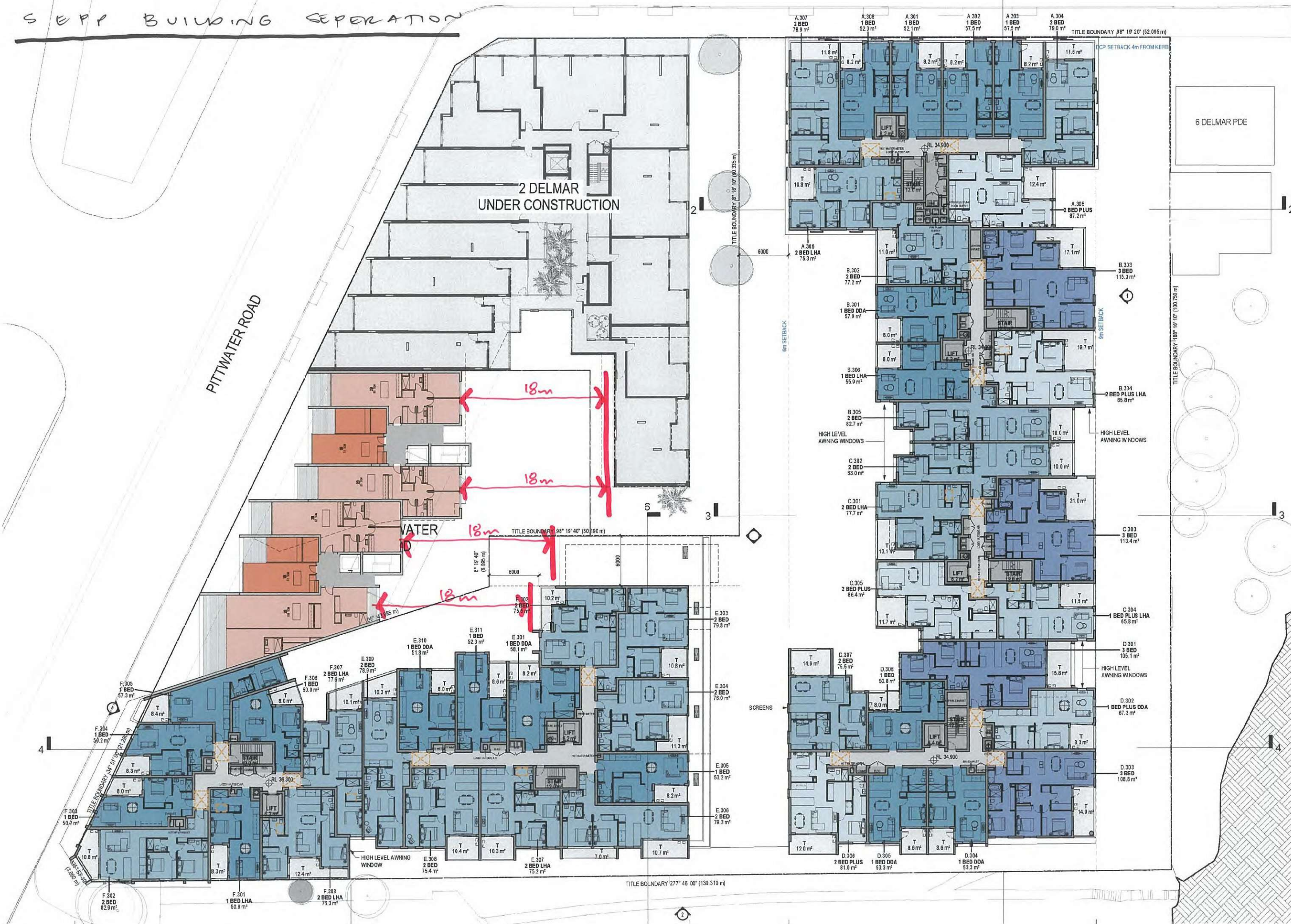


SEPP BUILDING SEPERATION

2 DELMAR UNDER CONSTRUCTION

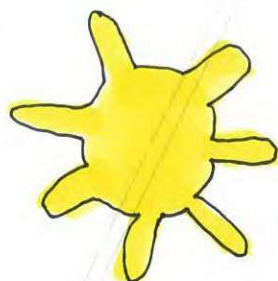
PITTWATER ROAD

6 DELMAR PDE



ADJOINING NEIGHBOUR

SOUND RELIANCE ACROSS
SIDE BOUNDARY

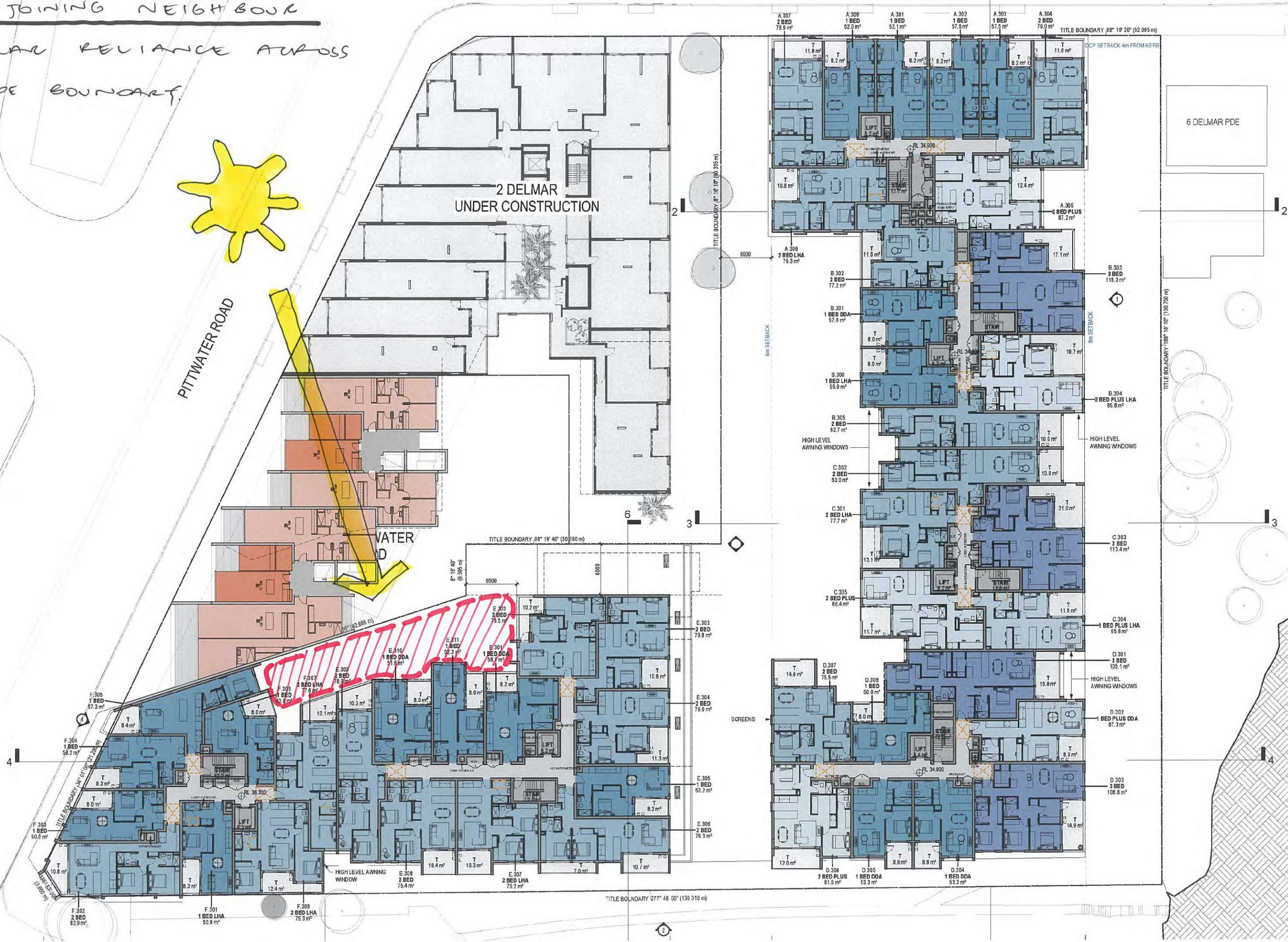


PITTWATER ROAD

2 DELMAR
UNDER CONSTRUCTION

WATER
D

6 DELMAR PDE



TITLE BOUNDARY 277° 46' 00" (130 310 m)

SEPP 65

BUILDING SEPARATION REQUIREMENTS

2 DELMAR UNDER CONSTRUCTION

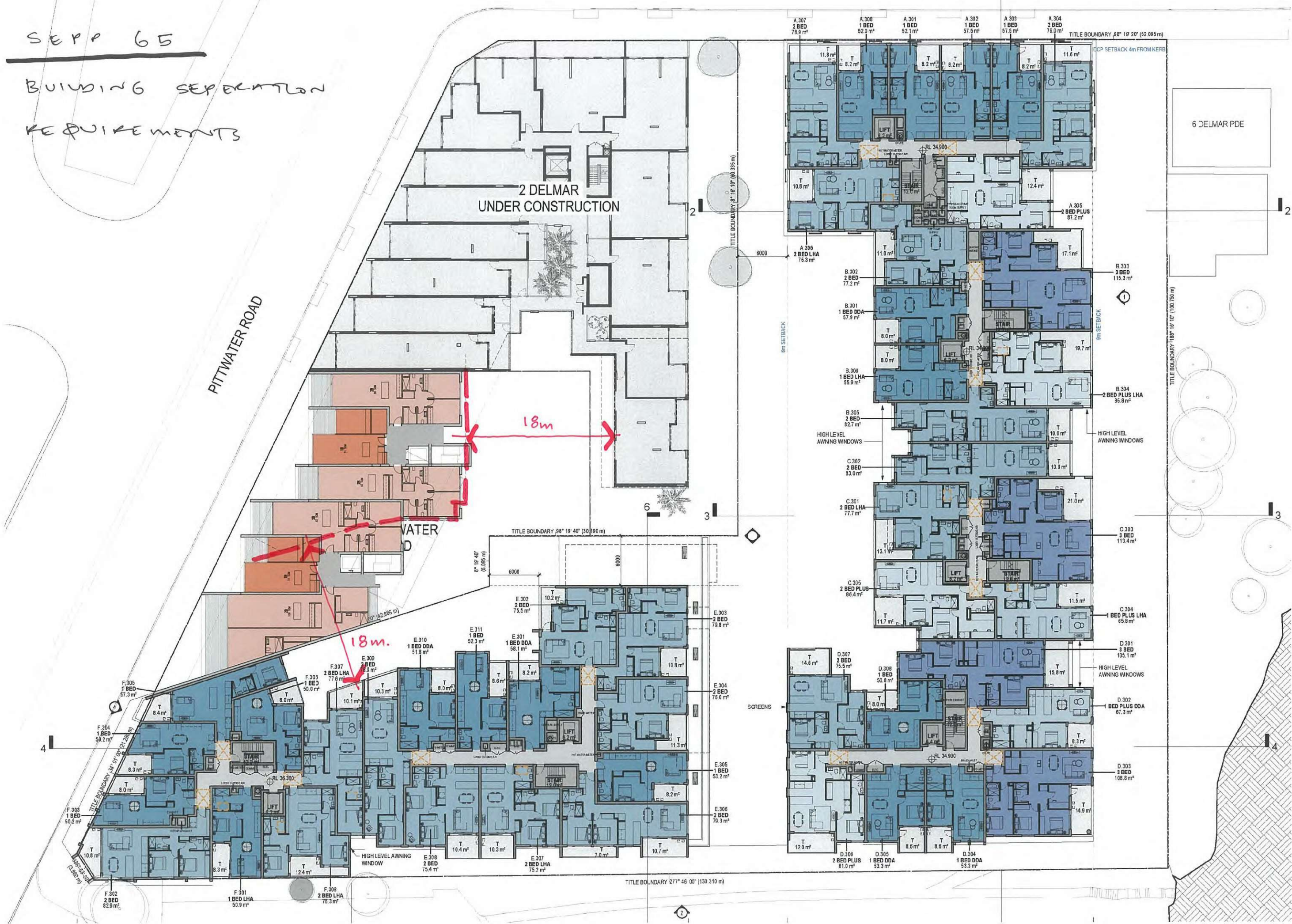
PITTWATER ROAD

6 DELMAR PDE

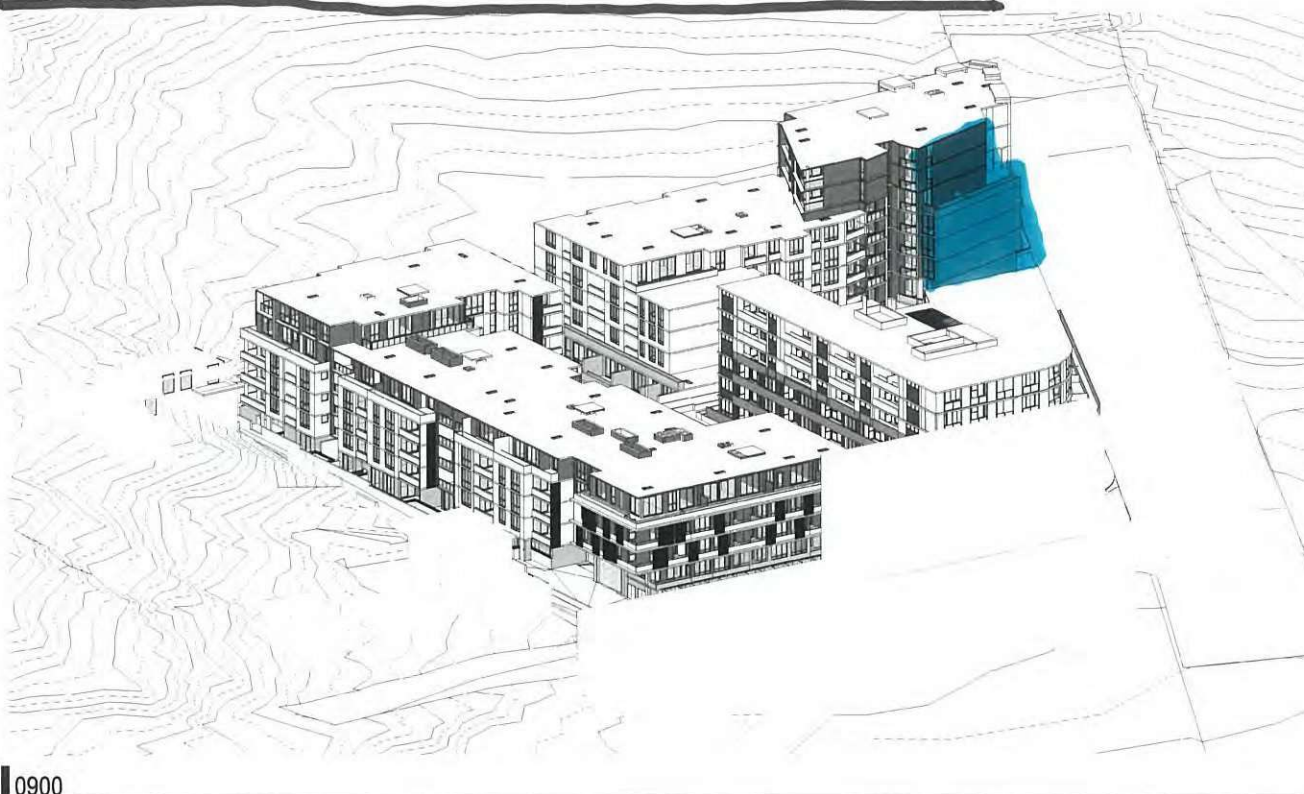
18m

18m

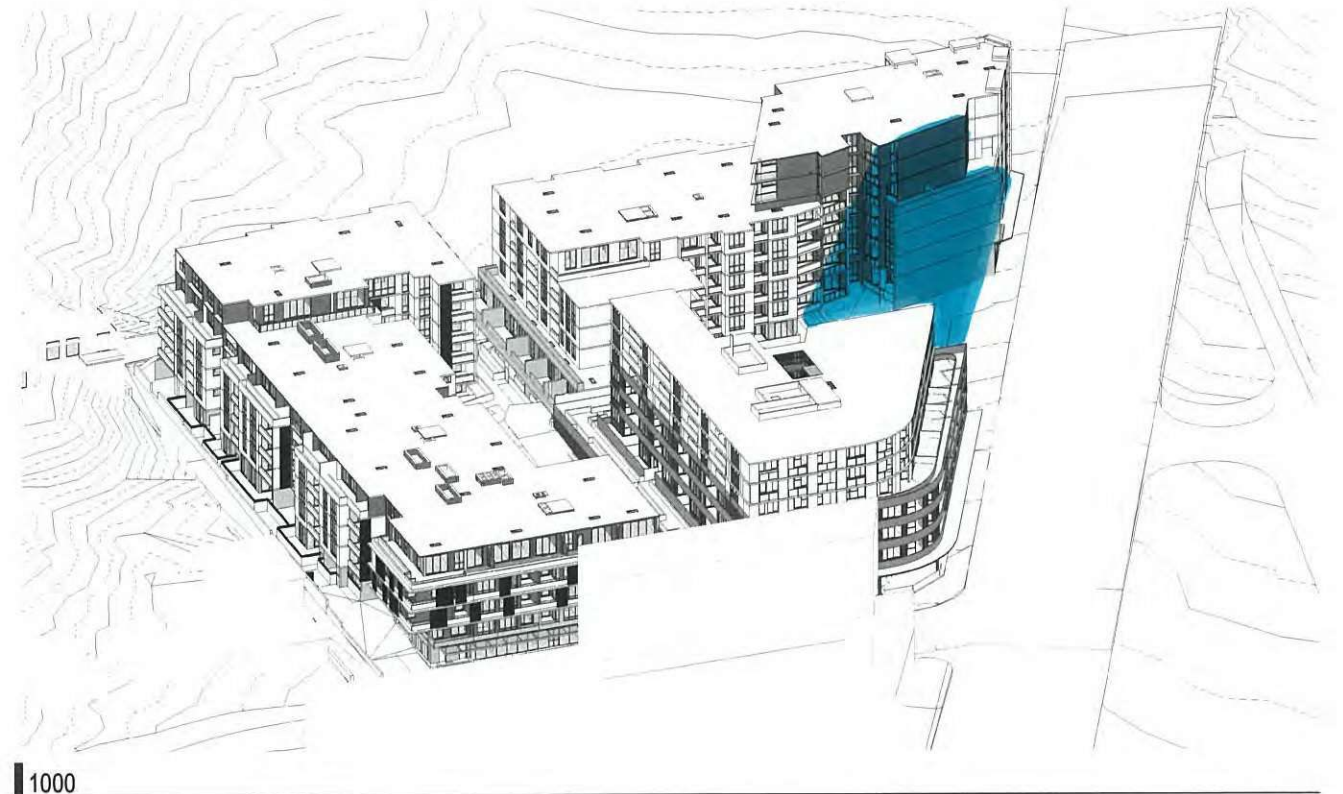
WATER



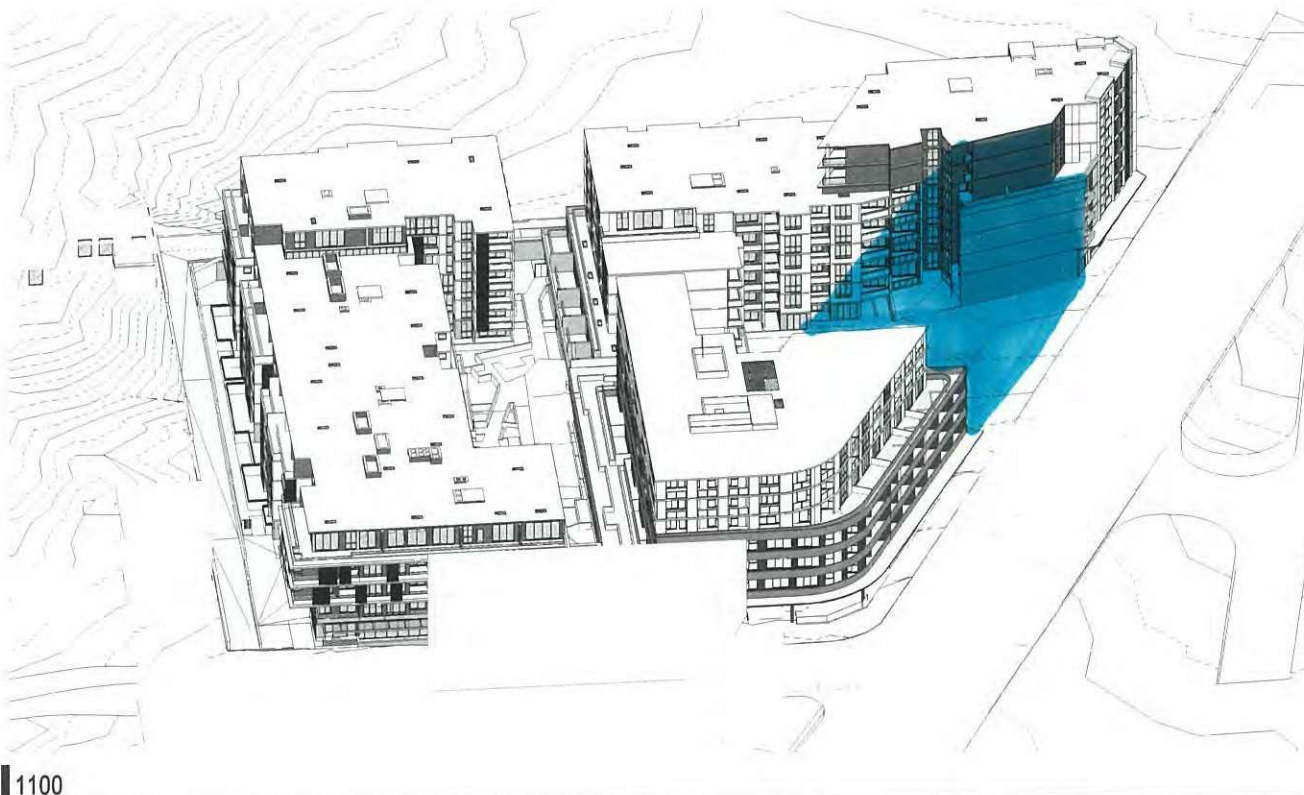
ASSUMED INFILL BUILDING.



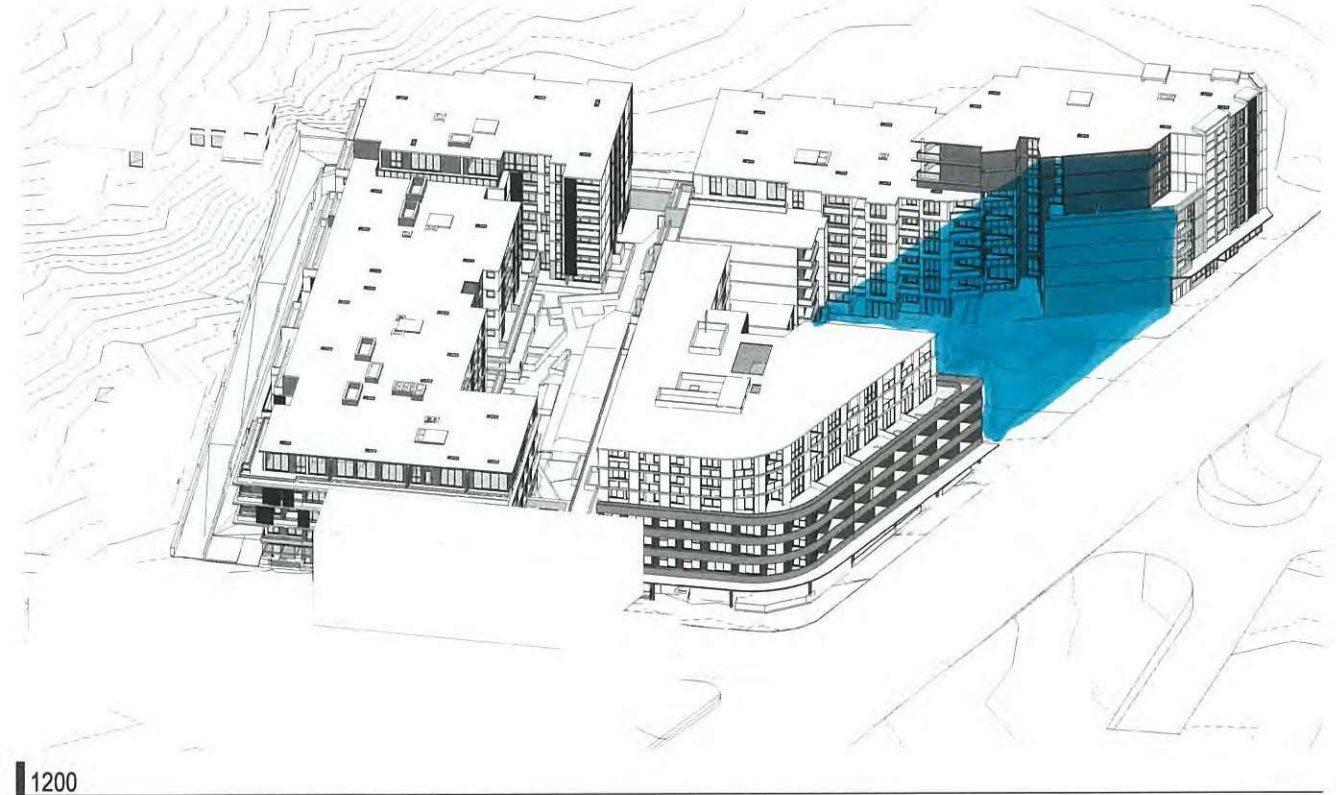
0900



1000



1100



1200

DA SUBMISSION

Revisions / A 14.12.2021 DEVELOPMENT APPLICATION JC

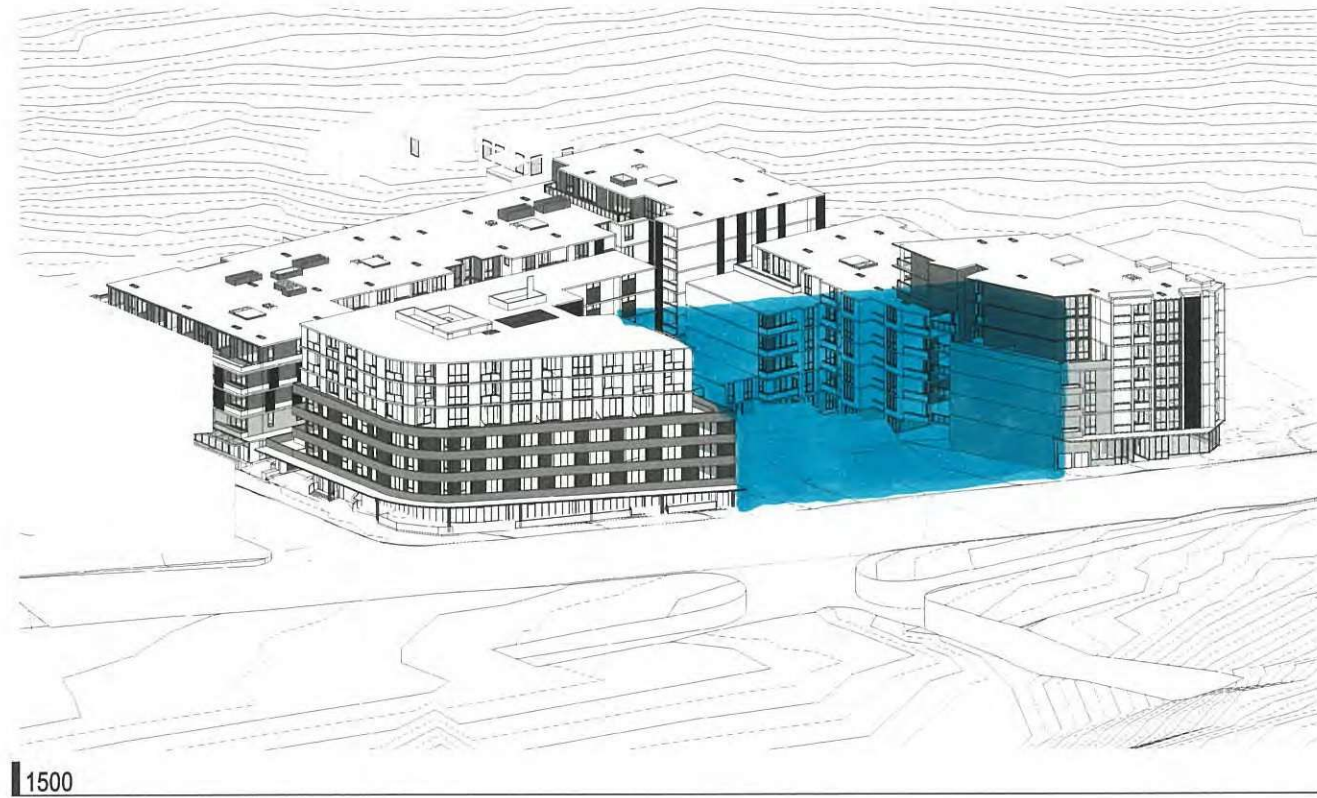
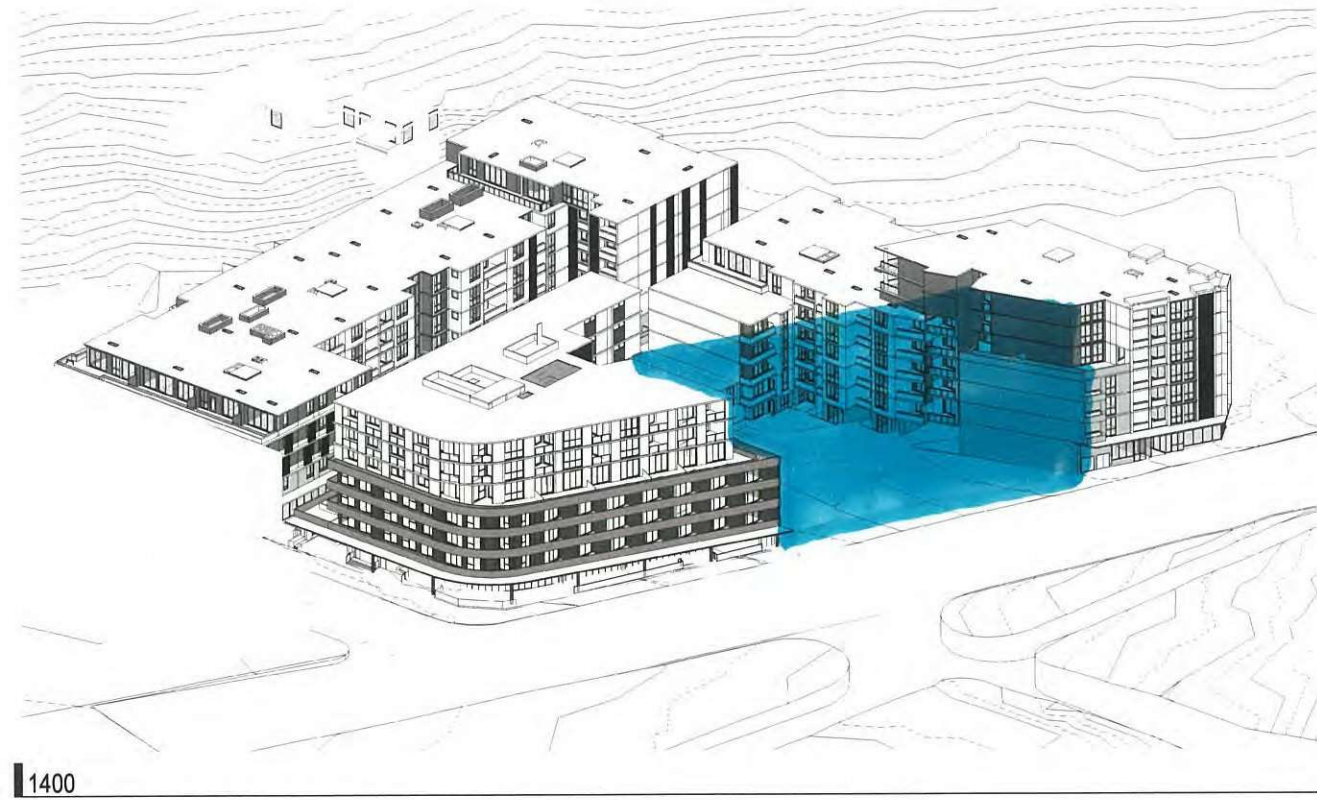
Client / Dee Why 3 Pty Ltd & Dee Why 4 Pty Ltd Project / 4 Delmar Pde & 812 Pittwater Rd, Dee Why

Drawing / SHADOW ANALYSIS - POV Project No / 221054 Date / 14.12.2021 Author / JC Scale: @ A1

Drawing No. / TP05.01 A

rothelowman

Brisbane, Melbourne, Sydney www.rothelowman.com.au



DA SUBMISSION

Revisions / A 14.12.2021 DEVELOPMENT APPLICATION JC

Client / **Dee Why 3 Pty Ltd & Dee Why 4 Pty Ltd** Project / **4 Delmar Pde & 812 Pittwater Rd, Dee Why**

Drawing / **SHADOW ANALYSIS - POV** Project No / **221054** Date / **14.12.2021** Author / **JC** Scale: @ A1

Drawing No. / **TP05.02 A**

rothelowman

Brisbane, Melbourne, Sydney
www.rothelowman.com.au