

12th May 2025

The CEO
Northern Beaches Council
PO Box 82
Manly NSW 1655

Attention: Tom Burns – Principal Planner

Dear Mr Burns,

**Development Application DA2024/1684
Supplementary Statement of Environmental Effects/ RFI Response
Construction of a mixed use development
638 Pittwater Road, Brookvale**

Reference is made to Council's correspondence of 17th March 2025 and a subsequent meeting with Council staff to discuss the content of such document and potential amendments moving forward. This supplementary statement has been prepared in response to the issues raised and is to be read in conjunction with the following amended architectural plans prepared by Barry Rush and Associates P/L:

LIST OF DRAWINGS

A01A	LOCATION DIAGRAM
A02B	B3 BASEMENT FLOOR PLAN
A03B	B2 BASEMENT FLOOR PLAN
A04B	B1 BASEMENT FLOOR PLAN
A05A	GROUND FLOOR PLAN
A06B	FIRST FLOOR PLAN
A07B	SECOND FLOOR PLAN
A08B	ROOF PLAN
A09B	ELEVATIONS
A10B	ELEVATIONS
A11B	SECTIONS
A12B	SHADOW DIAGRAMS
A13A	SITE ANALYSIS
A14A	DEMOLITION PLAN
A15A	VIEWS FROM SUN
A16A	VIEWS FROM SUN
A17A	DRIVEWAY SECTION
A18B	EXTERNAL COLOUR SCHEDULE
A19A	MEZZANINE FLOOR PLAN
A20B	THIRD FLOOR PLAN

This submission is also accompanied by Revision SK1 landscape plans prepared by Conzept Landscape Architects. The amendments are detailed within the schedule of amendments at **Attachment 1** with photographic evidence of the placement of notification signage at **Attachment 2**.

The following section of this submission will detail the response to the various issues raised.

DSAP Report & Built Form / Urban Design

Response: We respond to the recommendations contained within the minutes of the Design and Sustainability Advisory Panel (DSAP) meeting of 6 February 2025 as follows.

1. Provide streetscape analysis scenarios to test and support any proposed additional storey: under the existing LEP controls; and the Brookvale Structure Plan with current draft LEP amended controls.

Response: On 15th April 2020 development consent DA2019/0239 was approved by the Northern Beaches Local Planning Panel with the consent subsequently modified on 24th February 2021 pursuant to mod 2020/0598 involving the introduction of storage mezzanines into the approved commercial spaces and the provision for an adjustment to the approved car parking numbers and arrangement to accommodate required fire service areas and storage.

This application seeks to provide an additional 20 apartments through the construction of an additional storey of residential accommodation noting that the shop top housing land use, height, form and residential density proposed are entirely consistent within anticipated for development on the land following the adoption of the Brookvale Structure Plan (BSP) by Northern Beaches Council at its meeting of 28 November 2023 which anticipates building heights of 30 metres or 8 storeys on the site.

We note that development consent DA2019/0239 has been commenced that due to ongoing holding costs our client is unable to wait until the gazettal of the draft Comprehensive Northern Beaches Local Environmental Plan (draft LEP) which has only recently been endorsed by Council and forwarded to the Minister for Planning and Public Spaces for Gateway Determination

The construction of a four (4) storey building on this prominent corner site is considered to represent a better planning and urban design outcome having regard to the BSP and the heights anticipated to emerge through the future development of the Brookvale precinct. The proposal provides for the orderly and economic use and development of the land without adverse streetscape, residential amenity or environmental consequences.

Accordingly, we consider it unreasonable and unnecessary to require the preparation of streetscape analysis scenarios to test and support any proposed additional storey: under the existing LEP controls; and the Brookvale Structure Plan with current draft LEP amended controls as recommended by the panel.

2. Generally, the façade treatments must retain the approved level of detail and modelling of building elements if not actively seek to improve them.

Response: The plans have been amended to reinstate the general level of façade treatments and detailing as originally approved with setbacks increase that the upper-level to ensure that it is a visually recessive element compared to the levels below.

3. The additional storey is to present a clear physical separation from the storeys below including areas of wall planes extending from storeys below. This is needed so the base, middle and top of the building is coordinated to be 3-dimensionally defined.

Response: As previously indicated increased setbacks have been provided to the upper-level to ensure that it is a visually recessive element compared to the levels below with variation in materiality also contributing to such outcome. The development clearly reads as having a base middle and top.

4. The curved corner façade is to increase the modulation more consistent with the approved DA and reduce the extent of glazing. This is needed to address the following: - so building elements in the façade demonstrate a 3-dimensional quality to the edge detailing - so junctions of materials and articulation of building elements can better control long-term weathering, - to increase the level of visual interest as a positive contribution to the street, and - better manage resident amenity. Note: dark tinted glazing or colour-backed glazed panels to manage solar heat gain and/or visual privacy is not supported as it disengages from the public domain, has poor internal amenity for residents/tenants, and would introduce a further busyness to an already busy materials/colour palette

Response: This recommendation has been incorporated into the amended plans as previously detailed.

5. The addition is to be physically defined not rely on painted surface finishes.

Response: This recommendation has been incorporated into the amended plans as previously detailed.

6. The top floor is to be modulated consistently so that it expresses the termination of the built form – top floor and roof.

Response: This recommendation has been incorporated into the amended plans as previously detailed.

7. Building height – floor-to-floor heights should be included in the current application to demonstrate a minimum of 3.2 metres plus realistic structural depths in section drawings. This should be increased where wet areas are proposed above habitable rooms of units below.

Response: This recommendation has been adopted with floor to floor heights increase to 3.2 metres as requested.

8. Reinstate the framing building elements deleted from openings to street frontages – also required to mitigate western sun.

Response: This recommendation has been incorporated into the amended plans as previously detailed.

9. See Amenity for implications for acoustic treatments and natural ventilation that may impact on the built form of the addition.

Response: This recommendation has been incorporated where possible into the amended plans. Appropriate visual and acoustic amenity is achieved.

10. Consideration be given to car parking to be at the minimum required rates where impacts could be reduced.

Response: No changes to the previously approved car parking regime are proposed.

11. Considered whether amenity improvements can be made between the ground level truck/loading and adjacent SOHO and podium above.

Response: This recommendation relates to elements which do not form part of the subject application.

12. Consideration should be given to street planting within a structural root cell system to enhance the streetscape and provide critical shade to the development. Tree species with an appropriate canopy spread should be selected to minimise or indeed eliminate the need for heavy pruning of branches on the building side of the trees in future years.

Response: This recommendation relates to elements which do not form part of the subject application.

13. Some building articulation to allow for planting on structures or some type of planter boxes to soften the building with overspill planting should be considered – including the detailed design of awnings to allow trees to grow and for canopy spread over time.

Response: Whilst street level awnings do not form part of the subject application the roof top communal open space has been provided with substantial landscape opportunity as detailed on the accompanying landscape plans with such landscaping discernible in a streetscape context.

14. The existing trees along the eastern boundary need to be assessed by a Level 5 Arborist and appropriate measures taken to ensure their health is protected and long-term viability is delivered.

Response: This recommendation relates to elements which do not form part of the subject application.

15. The proposal should consider a green roof option with low growing ground covers – (there are several companies specialising in this area) to respond to reducing the heat island effect, reduce the reliance on heating and cooling, and improve the performance of rooftop PV.

Response: The roof top communal open space has been provided with substantial landscape opportunity as detailed on the accompanying landscape plans with such landscaping discernible in a streetscape context.

16. The internal courtyard area does not seem to address the space well and does not provide much in the way of vegetation especially tree planting. Consideration for redesigning this space including its relationship with the ground level could be undertaken with little design changes to any other part of the building or infrastructure.

Response: This recommendation relates to a matter which does not form part of the subject application.

17. Solar modelling – sun-eye (or views-from-the-sun) analysis is to include compliant building envelopes for future development of neighbouring sites/sites in the vicinity to determine solar performance and overshadowing to and from permitted development.

Response: This recommendation can only relate to the proposed upper-level apartments which will receive good levels of solar access throughout the day. No development is proposed on adjoining lots with the current height standard ensuring that future development can occur on adjoining lots without impact on the upper-level apartments in terms of shadowing.

18. Natural ventilation and cross ventilation – all new units are to demonstrate they satisfy the ADG design criteria. It is recommended natural and cross ventilation performance be improved through deletion of 2 or three units, which would still result in a net increase of 17 units. This would enable the Lift 2 lobbies to be open and create a single northern courtyard space linking the airflow path to the Charlton Lane as a similar treatment to the open entry between buildings L3 and L4.

Response: The overall development satisfies the solar access and natural cross ventilation requirements of the ADG as depicted on plan A12B prepared by the project Architect.

19. Natural daylight – all new units are to provide natural daylight to all habitable rooms consistent with ADG design criteria.

Response: As above.

20. Floor-to-floor heights – the applicant should consider broadening the current application to include all residential floor to floor heights be increased to a minimum of 3.2 metres noting additional height may be required for additional ceiling insulation for wet areas/terraces and the like above habitable rooms below, and to accommodate adequate structure for the podium, paving and landscape and complaint waterproofing.

Response: This recommendation has been adopted with floor to floor heights increase to 3.2 metres as requested.

21. Existing departures from the ADG minimum performance – it is recommended there is an opportunity as an Amending DA, for the development to address existing deficiencies to improve the overall building performance and resident amenity expected by ADG minimum performance benchmarks.

Response: This recommendation relates to elements which do not form part of the subject application. That said, amenity and buildability has been enhanced to the previously approved apartments through an increase in floor to floor heights as previously outlined.

22. Clarify lift lobbies 3 and 4 - for managing the perceive conflicts for the SOHO back of house and residential uses.

Response: This recommendation relates to elements which do not form part of the subject application.

23. Clarify natural ventilation – how is it proposed for single aspect units in the noisy location.

Response: This recommendation relates to elements which do not form part of the subject application although all apartments will be provided with air conditioning to ensure appropriate internal amenity should the occupants choose to close the windows to achieve increased acoustic attenuation.

24. Confirm acoustic requirements – for the fourth-floor level. This may impact on the building line and how the addition relates to the levels below such as the need for wintergardens, setting the building mass inboard of the building edge below.

Response: We rely on the Noise Impact Assessment prepared by Rodney Stevens Acoustics submitted in support of the application.

25. Reinstate building elements such as framing around wintergardens, so that the facades demonstrate a modulated depth needed to contribute positively to the streets.

Response: This recommendation has been incorporated into the amended plans as previously detailed.

26. Minimise the use of high maintenance materials such as painted finishes that do not perform well over the long term. On-going and frequently required maintenance so the quality of the building's appearance is retained over the life of the building is an unreasonable burden for future residents when more robust and durable materials are available.

Response: This recommendation has been considered and incorporated into the revised schedule of materials and finishes where considered appropriate.

27. Reconsider the massing, materiality and colour selection for the fourth storey addition and include meaningful parapet edge detailing to terminate the wall plane around the building and generous roof eaves for shadow reveals and solar protection for exposed aspects.

Response: This recommendation has been incorporated into the amended plans as previously detailed.

28. Remove gas from the building.

Response: The proponent proposes no changes to the submitted BASIX Certificate and associated sustainability requirements.

29. Gas cooktops can be replaced with induction.

Response: As above.

30. The gas hot water system should be replaced by heat pump - the location may need to be on the roof to ensure adequate ventilation.

Response: As above

31. A 9kW PV array is very small for this size building. Increase the array and consider a green roof under the PV.

Response: As above

32. Also consider increasing the PV provision to avoid challenges of proposed 4-star dryers which are heavier and impact architectural layouts and structural requirements.

Response: The proponent proposes no changes to the submitted BASIX Certificate and associated sustainability requirements.

33. Surplus car parking should not be provided, ensure the spaces provided are restricted to the minimum required for the development.

Response: This recommendation relates to a matter which does not form part of the subject application.

34. The solar protection for the fully glazed corner wintergardens is to be provided which should include providing a solid balustrade to also address visual privacy.

Response: This recommendation was considered however ultimately not adopted as appropriate levels of light, ventilation and privacy will be afforded to the street facing wintergardens.

Residential Amenity

Response: A roof top communal open space area has been provided as recommended by Council with the design and siting of the associated access and shade structures ensuring that it will not be readily discernible in a streetscape context or from the public domain.

Internal privacy impacts have been addressed through the provision of privacy screen treatments to the courtyard facing balconies.

In relation to concerns raised as to potential shadowing from future development to the north this concern can only relate to the proposed upper-level apartments which will receive good levels of solar access throughout the day. No development is proposed on adjoining lots with the current height standard ensuring that future development can occur on adjoining lots without impact on the upper-level apartments in terms of shadowing.

Traffic Engineer Referral Response

Response: In relation to the concerns raised regarding the lack of end of trip facilities we note that the previously approved development did not contain such facilities with the proposal not justifying any change to the approved circumstance. Further, no changes are proposed to the previously approved car parking or bicycle storage arrangements noting that there are ample opportunities to provide the additional bicycle storage as required by way of appropriately worded conditions of consent.

Waste Referral Response

Response: We note that no changes are proposed to the commercial waste management arrangement. We confirm that there is ample space within the basement area for a compliant bulky waste goods room with such requirement able to be appropriately conditioned. The scaled waste storage room diagrams contained within the submitted waste management plan clearly demonstrate that the residential waste storage areas can accommodate the 46 residential waste bins required. The direction of door swings can be conditioned.

Discrepancies on Architectural Plans

Response: The amended architectural plans resolve the identified plan discrepancies.

Evidence of Notification Sign

Response: Photographic evidence of the placement of notification signs is at Attachment 2.

Having given due consideration to the matters pursuant to Section 4.15(1) of the Environmental Planning and assessment Act, 1979 as amended, it is considered that there are no matters which would prevent Council from granting consent to this proposal in this instance.

Please not hesitate to contact me to discuss any aspect of this submission.

Yours faithfully

Boston Blyth Fleming Town Planners



Greg Boston

B Urb & Reg Plan (UNE) MPIO

B Env Hlth (UWS)

Director

Attachment 1 - Schedule of amendments

Attachment 2 - Photographic evidence of notification signs

Attachment 1



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22nd April 2025

638 Pittwater Road Brookvale
Drawing Schedule

No	Rev	DRAWING	DATE	AMENDMENTS	
A01	A	Location Diagram	17/4/25	Development data updated	
A02	B	Basement Level B3	17/4/25	No change	
A03	B	Basement Level B2	17/4/25	No change	
A04	B	Basement Level B1	17/4/25	No change	
A05	A	Ground Level	17/4/25	No change	
A06	B	First Floor Level	17/4/25	Window mullions added to corner balcony Window awnings re-instated	
A07	B	Second Floor Level	17/4/25	Window mullions added to corner balcony Window awnings reinstated Floor level raised 150mm to match ADG requirements	
A20	B	Third Floor Level	17/4/25	Units 41,48,49 & 50 setback from southern boundary with Orchard Road. Unit 43 to be adaptable replacing unit 48 Floor level raised 150mm to match ADG requirements	
A08	B	Roof Plan	17/4/25	Added Landscaping areas including, seating planters, play areas, paved courts, Vegetable gardens, BBQ area with pergola shading. Photovoltaic cells relocated. Added lobby areas and store rooms/ WC to Lifts and stairs Refer to Landscape Plans Floor level raised 150mm to match ADG requirements.	
A09	B	Elevations	17/4/2026	Level 3 setback from boundaries Roof level landscaped Lift and stairs extended to provide access to roof Window awnings reinstated to windows facing Pittwater Road and Orchard Road. Floor Levels raised to provide minimum of 3.2m Floor to Floor.	

A10	B	Elevations	17/4/2025	Level 3 setback from boundaries Roof level landscaped Lift and stairs extended to provide access to roof Window awnings reinstated to windows facing Pittwater Road and Orchard Road. Floor Levels raised to provide minimum of 3.2m Floor to Floor.	
A11	B	Sections	17/4/2025	Level 3 setback from boundaries Roof level landscaped Lift and stairs extended to provide access to roof Floor Levels raised to provide minimum of 3.2m Floor to Floor.	
A12	B	Shadow Diagrams	14/5/2024	No change	
A13	A	Site Analysis Plan	17/4/2025	No change	
A14	A	Demolition Plan	17/4/2025	No change	
A15	A	Views from sun 1	14/5/2024	No change	
A16	A	Views from sun 2	14/5/2024	No change	
A17	A	Driveway Section	14/5/2024	No change	
A18	B	External Colours	17/4/2025	Revised Colours	
A19	A	Mezzanine Floor	14/5/2024	No change	

DEVELOPMENT PROPOSAL

Application No: 2021/01094

Description: Development and subdivision of land for residential and commercial purposes

Property Address: 147-151 Main St
Geelong VIC 3220

Applicant: G & G Australia Pty Ltd

Exhibition Period: 10 January 2022 - 27 January 2022

You can view the plans for this proposal online at www.geelong.vic.gov.au/development and follow the process of the application. If you are unable to do this, you can view the plans at the City of Greater Geelong's Customer Service Centre, 147-151 Main St, Geelong, VIC 3220. For more information, please call 03 5223 1100 or email development@geelong.vic.gov.au.



