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**From:** Greg Boston [REDACTED]  
**Sent:** Tuesday, 15 October 2024 11:43 AM  
**To:** Planning Panels - Northern Beaches  
**Cc:** Glenn Piper  
**Subject:** RE: NBLPP - Register to Address Panel - 16 October 2024 - Item 4.1, Harbord Hotel Planning Proposal

**Categories:** NBLPP

Hi Heidi,

Please see below a submission to the NBLPP for their consideration ahead of tomorrow's meeting.

Dear Northern Beaches Local Planning Panel (NBLPP) members.

As applicant for the Planning Proposal prepared on behalf of Harbord Hotel Operations Pty Limited we confirm that we have reviewed the Council assessment report seeking advice from NBLPP in relation to the subject application.

Whilst we endorse the Council assessment report, we do request that the NBLPP consider the following in its review of the application including the proposed amendments to the applicant's Planning Proposal.

**Amendments to applicants Planning Proposal.**

- Retain "pubs" as a land use that is permissible with consent on Lots 1-5 and 13, Section 1, DP 7022.

Comment: No objection is raised to this amendment which has the effect of excluding "pubs" as a land use that is permissible with consent on Lot 6, Section 1, DP 7022. No. 64 Undercliff Road, Freshwater.

- Permit "hotel or motel accommodation" with consent only on the south-eastern portion of the site, being Lots 1, 2 and 6, Section 1, DP 7022.

Comment: The 2<sup>nd</sup> to last paragraph on page 14 of the agenda indicates that *although the hotel accommodation building would share access to shared underground parking across the whole site, the proposed accommodation is not integrated with nor ancillary to the existing pub use*. Further, the assessment report indicates that as the proposed hotel building is *separate to the "pub" use and constrained to the south-eastern portion of the site, Council does not accept that it is necessary for "hotel or motel accommodation" to be added as an additional permissible use on lots 4, 5 and 13, Section, DP 7022 to achieve the intended outcome of providing hotel accommodation on the site.*

We do not agree with these comments on the basis that both land uses will no doubt rely on a shared access/ egress and basement car parking arrangement with permissibility contingent upon such land uses being permissible with consent upon the land occupied by such car parking associated access/egress. Further, both the existing "pub" and any proposed "hotel or motel accommodation" use will be owned and operated by the same entity with it anticipated that operations across the site

will occur in accordance with a single Operational Plan of Management which will not only manage potential impacts to surrounding residential properties but also manage potential land use conflicts between uses on the site.

Whilst the further justification outlined on page 15 of the agenda in relation to *limiting proposed hotel accommodation used to the south-eastern portion of the site where it can act as a buffer between the properties on Undercliff Road and the existing pub use* is noted, such outcome can be achieved without the land use restriction as proposed noting that the only portion of the landholding of sufficient size and geometry to accommodate “hotel or motel accommodation” is its south-eastern portion given the heritage listing of the existing hotel building which prevents its demolition.

Maintaining “hotel or motel accommodation” as permissible with consent across the entire landholding will provide ultimate flexibility in relation to the design and operation of future “hotel or motel” accommodate in circumstances where it is accepted in the assessment report that the site has sites specific and strategic planning merit in relation to the additional permissible use proposed.

On this basis, we request that “hotel or motel accommodation” be permissible with consent across all Lots as detailed within the submitted Planning Proposal.

Regards

Greg Boston  
B Urb & Reg Plan (UNE) MPIA  
B Env Hlth (UWS)  
Director



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