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RE: DA2020/0442 - 231 Whale Beach Road WHALE BEACH NSW 2107

Re: DA 2020/0442 Proposed demolition and redevelopment of 231 Whale Beach Road, Whale Beach, NSW, 2107.

I am writing to register my strong objection to DA 2020/0442.

I have been a resident of Cynthea Road, Palm Beach for more than 10 years. On foot, Whale Beach, and its associated neighbourhood centre, is my closest beach/café area and I frequent the area several times a week. My family also frequented the Ripples café when it was still trading.

Whilst it is clear that some of the current structures on this site are dangerous, and the whole site is ready for rejuvenation, I believe that the DA is unsuitable in its current form for the following reasons.

1. The notion of urban renewal. The Statement of Environmental Effects compiled by Tomasy Pty. Ltd, and commissioned by Richard Cole Architects describes this project as a "form of urban renewal" which will "activate the Whale Beach locale" and suggests that it will be consistent with "the desired future character of the locality". The dictionary definition of the word urban is 'of, relating to, or located in a city' or 'characteristic of the city, or city life'. Whale Beach is a quiet, beachside suburb. The vibe is relaxed and laid back, enjoyed by families and surfers, with no desire to be 'activated', nor to become urban or city-like. It is unconscionable that owners, developers and architects could be given free rein to choose to change the characteristics of a neighbourhood in this way. Northern Beaches Council has undertaken considerable community engagement under the umbrella of Place Planning and the idea of 'creating places for people' in order to understand how the community experience their neighbourhoods and how they feel about them. These concepts are vital for the health and well-being of communities and should be protected from proposals that so dramatically and blatantly aim to change the character of a place.

2. Zoning. This site is zoned "B1 Neighbourhood Centre" on the Pittwater LEP, 2014. The objective of this zoning is "to provide a range of small-scale retail, business and community uses that will serve the needs of the people who live and work in the surrounding neighbourhood." In the context of what Whale Beach is - a quiet beach-side suburb - the proposed development cannot be considered 'small scale'. It can also not be considered to be aimed to serve the needs of those who live and work in the area given the desire of the developers as outlined above, to bring an urban feel and increased activation to the area.

It is also noted that this zoning allows shop-top housing. The fact that this zoning allows shop-top house should not mean that shop-top housing should be permitted in every locale to which

it applies. Shop top housing is completely inappropriate for Whale Beach Road. Other locations that have shop top housing in this area are on main thoroughfares such as on Barrenjoey Road in Newport and Palm Beach and on Old Barrenjoey Road in Avalon. All of these developments have ample access and parking for tenants and visitors. This site does not. Whale Beach Road is a local road that is often difficult to navigate due to parked vehicles and especially congested at weekends and during school holidays.

3. Affordable Housing. The current structure, over its lifetime, has provided affordable housing to a number of residents/families in this area. Affordable housing is in very short supply at this end of the peninsula and many properties that fulfil this description are as dilapidated and poorly maintained as this current one. Whilst not suggesting that affordable housing be constructed on this site, I would like to know how Northern Beaches Council aims to mitigate this loss to the community, should the development go ahead. It is noted that shop-top developments often aim to provide more affordable housing options however the apartments in this development clearly fall into the 'luxury' category and therefore do not in any way provide for the needs of middle-income community members.

4. Traffic and Parking. Whale Beach Road is a local road which, as mentioned above (2), is often difficult to navigate and congested during peak periods. The Traffic and Parking Impacts Report provided by TEF Consulting as part of this DA has failed to adequately predict traffic and parking issues. Parking demand surveys were undertaken on two Saturdays (7th and 21st) in September 2019. It is grossly misleading to draw conclusions from a parking demand survey solely conducted outside of the peak season at an obviously seasonal location. In addition, there are to be no loading facilities. All loading/unloading will occur on Whale Beach Road, which is, as previously mentioned, an often-congested local road. The report concludes with the blatantly ridiculous statement that "ample parking opportunities exist in the surrounding streets to cater for the additional parking demand." Anyone who spends any time in this area will contest that this is simply untrue.

5. Size and Scale. It has been suggested that this is a 'like for like' proposal with a complex that has 5 apartments and 3 retail outlets being replaced by a new development that similarly has 5 apartments and 3 retail outlets. This, again, is grossly misleading. The current structure has 5 very modest apartments with a small (no longer usable) garage space and a small, low key retail development which encompasses a small cafe. The new proposal has five large, luxury apartments, three retail outlets, two sizeable cafes and a large undercover parking area. This is excessive and completely out of proportion in this locale, and on this site. The building is unacceptably high from the western (Whale Beach Road) elevation and excessively bulky from the east. I do not concur with the applicants claim that this development will not "negatively impact the visual amenity and scenic qualities of the immediate locality". (State Environmental Planning Policy (Coastal Management) 2018). The current structure is an eyesore and - arguably - should not have been built at that location. We now have an opportunity to ensure that this historic planning disaster is not repeated.

6. Environmental Concerns. This proposal involves the removal of a number of existing mature trees. Whilst it is suggested that these will be replaced with specimens of a similar size and nature, it is unclear how that will be possible - or how such specimens will be able to thrive - given the extent and size of this development. Additionally, the development proposes an extremely large-scale excavation of sandstone. This will change the nature of the site irrevocably and is considered to be unjustifiable in this location. The notion that the landscaping and planting proposed will soften the view of the building and reduce bulk and scale impacts is questionable. The phrase "putting lipstick on a pig' comes to mind.

7. The Issues of Non-Compliance. There are several areas of non-compliance listed in the Statement of Environmental Effects, for example regarding parking spaces and boundary setbacks. Many of these are optimistically referred to as 'minor'. I would suggest that compliance is an either/or phenomenon. As such, the notion of minor non-compliance is an oxymoron and should be rejected outright.

In summary, I oppose this Development Application for the myriad of reasons outlined above. I implore Northern Beaches Council to look to its own principles regarding both the concept of 'place' and the notion of environmental custodianship, and to insist that this site is redeveloped holistically. I have no doubt whatsoever that the current architects are capable of a re-design that is more suited to the site and community needs than what has been offered here.

Your sincerely,

Pam Paton