
From: Simon Lincoln
Sent: 3/06/2025 8:22:52 PM
To: Council Northernbeaches Mailbox
Subject: TRIMMED: Fwd: Objection to Proposed Development Application DA2025/0132 – 37 Roseberry Street, Balgowlah
Attachments: DA2025-0132_Objection letter_Lincoln.pdf;

Please note that further to the recent amendment to the above DA my objections still stand as these have not been answered in the revised documentation.

Kind regards

Simon Lincoln

Please find my objection attached and below.

I would like the opportunity to speak at the planning committee hearing, please can you inform me when this is likely to occur.

Kind regards

Simon Lincoln
Architect
ARBNSW 10236

Dear Sir/Madam,

Re: Objection to Proposed Development Application DA2025/0132 – 37 Roseberry Street, Balgowlah

I am writing to formally object to the proposed development DA2025/0132 at the junction of Roseberry Street and Kenneth Road, as outlined in the planning application. I have reviewed the proposal in detail and, after careful consideration, I believe the development will have significant detrimental impacts on the local community. Rather than reiterate the points raised by other objectors, I wish to focus on two fundamental issues that have not been adequately addressed in the application: the lack of an appropriate design and urban design response and the unsatisfactory traffic assessment.

1. Urban Design / Design Response

The proposed development fails to present a considered and contextually appropriate urban design solution for both the site and its surrounding area. The corner of Kenneth Road and Roseberry Street currently presents a strong urban edge, activated by a café that engages with the street corner and contributes positively to the public realm. This urban design feature is consistent with the local fabric and enhances the vibrancy of the area. In contrast, the proposed development undermines this urban edge by replacing the active street frontage with a strip of low-lying landscaping and a non-permeable, non-activated road edge. This approach weakens the sense of place and diminishes the vibrancy of the street.

The importance of corner sites is acknowledged in the Council's Development Control Plan (DCP) Compliance Assessment. However, the proposed design does not meet the required standards for high-quality design or a context-sensitive response. There is a lack of evidence in the submitted documentation demonstrating how the design respects or contributes to the surrounding environment. The responses provided to the DCP compliance requirements are insufficient, as many simply repeat the questions without offering meaningful solutions. There is no design report included that demonstrates how the proposed development supports a high visual quality design or how it actually intends to comply with the necessary urban design principles and context.

As it stands, the proposal appears to be a generic, off-the-shelf design that could be replicated in any location across Australia, with no regard for the unique characteristics of the site. This is not an acceptable standard of urban design for a site located in an established residential area, which requires a more thoughtful and site-specific approach.

Furthermore, the submitted plans do not indicate any provision for photovoltaic (PV) panels or other sustainable design features. There is no discussion regarding measures to enhance the sustainability of the development or whether the project aims to meet only the minimum standards. This lack of detail raises concerns about whether the development is being designed with the future sustainability of the site in mind.

Regarding the Floor Space Ratio (FSR), the current site has an FSR of 1:1, and this development significantly underutilizes the available floor space. Given the surrounding density and the proximity to a well-supported transport network, there is a strong argument that the site should provide at least a 1:1 FSR. A prominent corner site such as this is an ideal location for increased density rather than a reduction. The development should also be considered as part of a larger planning framework, in consultation with the Council, to ensure that this site contributes positively to the broader urban growth objectives, including addressing the housing supply shortage in NSW.

The proposed signage for the development raises several issues, particularly in terms of compliance with the DCP requirements.

- * **4.4.3 Signage:** The proposal outlines an excessive number of signs, which is inconsistent with the guidelines set out in the DCP.
- * **4.4.3 (e) Streetscape:** The proponent's assertion that the signage is of an 'unobtrusive design and colour' is misleading. The proposed signs do not reflect the requirements outlined in the DCP and should be redesigned or removed to meet the standards specified.
- * **4.4.3 (h) 24-Hour Illumination:** Given that the development is proposed to operate 24 hours, it is unclear whether the signage will be illuminated throughout this period. This would likely be unacceptable to the surrounding residents, as constant illumination could disrupt the local amenity and contribute to light pollution.
- * **4.4.3 (k) iii:** The DCP specifies that pole or pylon signs should not dominate the building or the landscape buffer area within the building setback. The current proposal does not comply with this requirement, and the sign's design needs to be reconsidered to ensure it does not overwhelm the area.

In summary, the proposed development does not meet the required standards for urban design or sustainability. A development of this nature should integrate seamlessly into its local context, enhancing the built environment and responding to the needs of the community. If such a retail development is to be introduced, it should be exemplary in both design and sustainability, setting a high benchmark for future developments in the area. Unfortunately, the current proposal does not meet these expectations, and I urge the Council to ensure that any future development in this location adheres to the highest standards of design and community integration.

2. Traffic Report

I have thoroughly reviewed the traffic study submitted as part of the application, and I am concerned that the assessment does not provide an accurate or comprehensive analysis of the potential traffic impacts of the development. The study was conducted over just two days in November, which is insufficient to capture a full picture of traffic flow in the area. The use of data from a 2016 study is also problematic, as it is outdated and does not reflect current or projected traffic conditions.

Furthermore, the traffic report fails to account for future increases in traffic flow, particularly in light of nearby developments and the anticipated growth in the area. A more appropriate approach would be to consider projected traffic volumes through to 2036, ensuring that the long-term impacts of the development are fully understood and mitigated.

The absence of a traffic counter (such as an electronic road-based device) to capture data over a longer period, such as a week or month, raises further concerns. Such data would provide a more accurate picture of how traffic currently behaves and allow for a more informed assessment of the potential impacts. It is unclear why this approach has not been taken, especially given the potential for significant traffic disruptions in the area.

In addition, I question whether any data has been gathered from nearby sites, such as the Brookvale development, to compare traffic patterns and assess the cumulative impact of multiple developments in the area. Furthermore, there is no mention of the potential impact on the right turn from Condamine Street to Kenneth Road, which could be affected by an increase in traffic diverting to the McDonald's site.

In light of these concerns, I believe the traffic study is inadequate and requires further investigation before any decision is made. The report raises more questions than it answers, and it is crucial that the Council ensures a thorough and accurate assessment of the traffic impacts before proceeding

Conclusion

In conclusion, I strongly urge the Council to reject the proposed development at 37 Roseberry Street, Balgowlah, based on the significant concerns raised regarding both the urban design and traffic impact assessments. The proposed development fails to deliver an appropriate urban design response, weakening the vibrancy of the area and not aligning with the context of the surrounding environment. The lack of sustainable design features, insufficient urban design considerations, and the generic, off-the-shelf nature of the proposal are unacceptable for a prominent site in an established residential area.

Furthermore, the traffic study provided is inadequate and fails to address critical factors such as future traffic growth, the impact of nearby developments, and the absence of long-term data collection. The current study does not provide a comprehensive analysis of the traffic impacts, raising further concerns about safety and congestion in the area.

I believe that any development in this location must adhere to the highest standards of design, sustainability, and careful planning, ensuring that it integrates positively into the local community and environment. I trust the Council will give due consideration to these concerns and ensure that any future development in this area is in the best interests of the local residents and the broader community.

Thank you for your time and consideration.

Yours faithfully,

Simon Lincoln

Architect - ARBNSW 10236

Simon Lincoln

26 Quirk Road

Manly Vale



Date: 10/03/2025

Dear Sir/Madam,

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