
From: [REDACTED]
Sent: 29/03/2024 12:59:42 PM
To: Council Northernbeaches Mailbox
Subject: TRIMMED: Submission re Application PEX2024/0002
Attachments: RSL proposal.pdf;

Please pass my attached submission to the appropriate person/Department.

Thank you,

Richard Michell

[REDACTED]

Submission re Application PEX2024/0002

I wish to lodge my objection to the proposed site-specific amendment to WLEP2001 for the site on the northern corner of Pittwater Road and Dee Why Parade at Dee Why.

Town Planning

The planning controls for the Dee Why CBD were arrived at after a long and exhaustive process which ran from about 1998 to 2010. There was widespread community, developer and planner input.

At the time of determining those controls the owners (Dee Why RSL) of the entire block bounded by Pittwater Road, Dee Why Parade, Clarence Avenue and Hawkesbury Avenue – which includes the subject site - requested that it be included in the CBD and potentially qualify for greater building heights. I understand that this was considered and refused at the time. As stated in the applicant's own documentation, any such change would/should require submission of a separate Planning Proposal. A request for site-specific amendment is not in my opinion a Planning Proposal.

Given this background, I believe that it is entirely inappropriate to consider a localised site-specific height increase which is not part of the considered plan for the CBD. If this were granted then the floodgates would open on many other sites that sit immediately outside the presently-defined CBD.

On a more minor matter, the applicant makes much of the fact that the current two storey building on the corner of the subject site is derelict. I understand that the applicant has been the owner of this site for many years. The dereliction is entirely of its own making and the applicant should not be rewarded for this historic combination of neglect and lack of concern for the appearance and functioning of the Dee Why Town Centre. The neglect is particularly surprising as I understand that the very first meeting of the Dee Why RSL was held in this building.

Site Use

As well as my objection on planning process grounds, I consider that it would be wrong to allow the accommodation on this site, which is close to a major public transport hub (as the applicant states), to be increased, but for that accommodation to be specified for retirement living. By definition, retirees will not be commuting to their places of employment and so there is no compelling reason for them to be located close to a major transport hub. By contrast, I can understand the applicant's desire to have them located close to its primary source of income – the RSL Club.

While I understand that retirement living is an allowed use under the current controls, if the accommodation density is to be allowed to increase on this site – which I do not consider appropriate to the extent proposed by the applicant – then it should be on the basis that the increase will be geared toward commuters, not retirees. It should also contain a significant level of social and/or affordable housing. A cash contribution in lieu is neither desirable nor appropriate.

The applicant argues that it is in practice impossible to provide affordable housing in a development for seniors. Without debating whether this is in fact true (it appears to be primarily a consequence of the approval/ownership model that the applicant is planning), the decision to devote the site to senior's housing is entirely that of the applicant. Last time around they proposed that it be used for a hotel. As I have stated above, I believe that the optimum use of the site is neither seniors nor visitors but residents who need to commute. That use would be compatible with provision of affordable housing, delivering a much better planning outcome. Dee Why is already very well served with retirement housing.

Town Centre Transition

The applicant proposes a height limit of 32 metres (9 storeys), a 246% increase over the current limit. It states that *“This measured increase from the existing height restrictions allows for a seamless architectural gradient from the Town Centre to surrounding medium-density residential areas”*.

I submit that this is a self-serving nonsense. The Town Centre currently ends at the building that is on the southern corner of Pittwater Road and Dee Why Parade. From memory this is 8 storeys and about 28 metres height limit. A proposal to build to 9 storeys/32 metres on the applicant’s site does not represent *a seamless architectural gradient from the Town Centre to surrounding medium-density residential areas*. It is unequivocally a spread (and in fact increase) of the Town Centre height. Once this proposed building was built then, on the same “logic”, there could be an application for a 10 storey building on the next site north and a similar claim made for it.

It is also noteworthy that the applicant states that *“The additional storeys are required as the yield in seniors living is lower than a traditional residential”*. Again, why is there such a driving need that the site be used for senior’s living? It is not optimum for the location (as argued above) and apparently is the cause of the need to have an excessive height.

Alternative Proposal

The site is appropriate for some increase in density in response to current housing demand and needs. I believe that an increase in allowed height to a level of five (5) stories on the corner site and four (4) on the secondary site would be appropriate. It would be visually compatible with the developments on the other three corners of the intersection involved and represent a genuine transition. However the accommodation should preferably be targeted at non-retirees and incorporate an appropriate level of affordable or social housing in return for the increase in the height limit.

Richard Michell, 29 March 2024