

6 September 2021

Our ref: STEV001  
Your ref: DA2020/0214

The General Manager  
Northern Beaches Council  
PO Box 82  
Manly NSW 1655

Attention: Mr Kent Bull, Planner, Development Assessment

By email: [kent.bull@northernbeaches.nsw.gov.au](mailto:kent.bull@northernbeaches.nsw.gov.au)

Dear Mr Bull,

**RE: DA2020/0214 – Mod2021/0221, 20 Palm Beach Road, Palm Beach**

I refer to your email dated 31 August 2021 advising that amended plans have been submitted for the development at 20 Palm Beach Road.

We have reviewed the plans with our client and expert team and advise that our client maintains the objection to the amended proposal based on the following observations:

- We note that the amended plans include further modifications to the internal layout of bedrooms, bathrooms and staircases.
- Pages MOD.23a/b/c provided are wholly inadequate in describing the shadow impacts. We request professional 3D rendered shadow diagrams be prepared comparing the existing and proposed shadows and be made available to us. Previous applications relating to the property included such diagrams, prepared by 'Michael Robilliard & Associates'. We expect the same level of detail to be able to assess the shadow impacts properly.
- While the amended skillion roof design appears flatter than before, further detail is needed to properly assess its impacts such as:
  - shadow diagrams as above still need to be assessed;
  - neither the site plan nor the roof plan shows any dimensions or height levels (RL's);
  - elevations only show a height RL for the existing roof ridge, but none is shown for the proposed skillion roof;
  - neither section nor elevation show the height limit line in order to assess breach of height limit control;

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We request the plans (incl. roof plan, sections & elevations) be amended to show dimensions and height levels in order to provide certainty on bulk and height of the additional roof.

- There still doesn't seem to be a written justification for the breach of the height control. The application relies on the previous justification without elaboration. A detailed justification referring to the objects of the zone and relevant LEP clauses needs to be provided.
- We note Council engineers could not support the amended proposal as there is inadequate information regarding the new fence. The amended plans seem to have deleted any information on the front driveway and fences, and don't show anything. As the engineers point out, this may have important impacts on drainage at the site, a matter of importance for our client.

As a result, our client maintains its opposition to the development, as the information is not sufficient to properly address the likely impacts. The concerns expressed previously are still very much in our client's mind and the amended information does not allay those concerns.

We look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'RW', with a horizontal line underneath.

**Robert Wilcher**  
Consulting Principal