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**Sent:** 12/05/2020 8:12:59 AM  
**Subject:** Submission against DA2020 0347  
**Attachments:** DA2020 0347 submission.pdf;

Please find attached my submission against DA2020 0347.

Regards,

Andrew Tripet

8th May 2020

Northern Beaches Council  
PO Box 82 Manly, NSW 1655  
Attention: Ms Lashta Haidari

Dear Lashta,

**RE: DA2020/0347 – New Seniors Housing Units with Basement Parking Development Application at 49 Forest Way, FRENCHS FOREST NSW 2086**

Thankyou for your opportunity to provide a written submission in relation to our concerns about the proposed development application DA2020/0347. The following submission is made on behalf of my family as owners of 25 Adams Street, Frenchs Forest which directly adjoins the proposed development site. This submission also voices the concerns of our immediate neighbours in Forest Way, Greendale Avenue and Adams Street who have personally spoken to us about the proposed development. The submission is informed by my work practice as a senior architect who regularly deals with development matters and also our personal experience as a family living in this part of Frenchs Forest and adjacent to the proposed development site. We wish to raise the following concerns about the development for Council's consideration to assist in their determination of the above application:-

- The proposal represents overdevelopment and is not permissible under relevant planning instruments;
- The proposal is inconsistent with the prevailing scale of the surrounding streetscape;
- The proposal will result in loss of visual and acoustic privacy to neighbouring properties;
- The proposal will increase overshadowing of 47 Forest Way;
- The proposal will create additional traffic on already heavily congested roads and intersections immediately adjacent to the development;
- The proposal will result in the loss of significant trees and severely impact others within immediate proximity to the development;
- The proposal positions the driveway access overlapping with our shared boundary. Existing high retention value street trees that provide us with shade and visual amenity are proposed to be removed and we will be subject to noise and light from headlights of cars turning into the driveway;
- There is insufficient and inadequate information supplied with this Development Application to enable a favourable determination.

These matters are outlined in further detail below in this submission.

**Overdevelopment and permissibility under relevant planning instruments**

The application is for 4 x 2 bedroom dwellings and basement parking. Following review of relevant planning controls and legislation it is clear that the intensity of proposed development is not consistent with Northern Beaches Council's LEP or DCP controls in relation to the sites R2 Low Density zoning.

Whilst the use of the Seniors Living SEPP is permissible for R2 zoned land, this is strictly on the basis that the lot size is greater than 1,000sq.m. The development site has a site area of only 923sq.m and on that basis alone the development should realistically be rejected as it fails to meet this mandatory requirement. There are numerous other points however which are discussed in further detail below

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that illustrate that the development is too large for the subject site and should be reduced in intensity or rejected outright.

I note that a Clause 4.6 variation has been lodged seeking dispensation from the mandatory site area standard under the Seniors Living SEPP requirements. Clause 4.6 is relevant as a means of providing variation to planning controls *only* where it can be irrevocably demonstrated that the planning condition is either *unreasonable* or *unnecessary* in its application to the proposal. The 1,000sq.m site area requirement to enable the application of Seniors Living SEPP development ensures that development sites have sufficient area to provide adequate setbacks, landscaping, carparking and amenity to the seniors living housing – without adversely impacting the existing amenity of the surrounding low-density housing.

The submitted Statement of Environmental Effect and accompanying Clause 4.6 state that the development is compatible with the surrounding low density area and will not impact on amenity. I submit that the development will create adverse impacts on the surrounding residential area on the basis of:-

- Inconsistency with prevailing scale of surrounding streetscape;
- Loss of visual and acoustic privacy;
- The proposed development can't be made to work without loss of and threat to significant trees;
- Light spill from car headlights entering our driveway
- Increased overshadowing, exacerbated by breach of DCP height requirements;
- Additional traffic on already heavily congested roads;

To quote the Clause 4.6 application directly "The proposed exception will not result in unreasonable or excessive physical impacts on the neighbouring properties or the streetscape quality of the property." and;

"The proposed exception is capable of being accommodated on the site without imposing any significant or adverse impacts on the amenity of the surrounding land, or the scenic quality of the wider locality."

If the above statements are indeed correct, I would like for the applicant to explain why it is that trees directly outside of my residence need to cut down to make way for the development even though they have high retention value, why we will now be subject to the noise and light pollution of cars entering a driveway that extends across the line of our boundary, why we will no longer be able to open our bedroom window without being overlooked, and why our neighbours at 47 Adams Street will have increased overshadowing and overlooking of their residence and private open space and that a large high retention gum tree will probably not survive the basement excavation proposed. I also note the added strain on an already stretched road intersection and visual scale of the development which will have broader impacts to the surrounding community.

**Development scale is inconsistent with prevailing scale of surrounding streetscape**

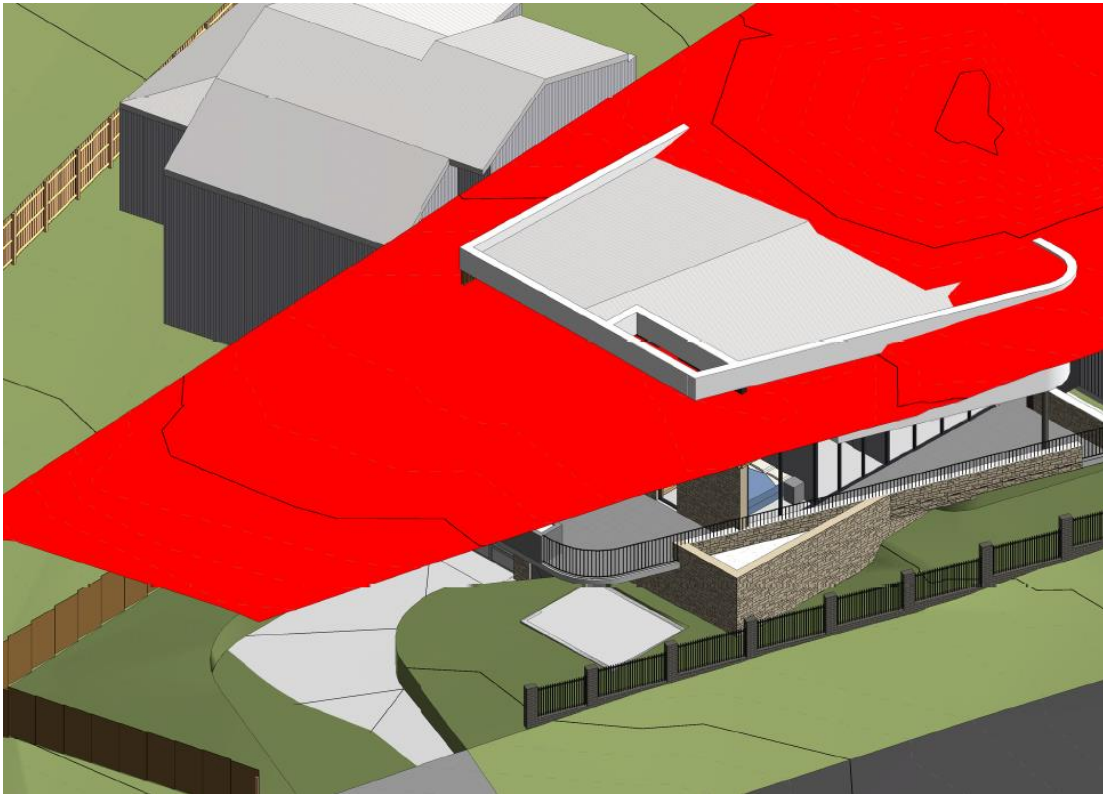
The immediate vicinity around the subject site has a prevailing character of detached single residence housing of one or two storeys. It is noted that there are two heritage listed residences in Adams Street and the prevailing low density development will not be preserved. The Statement of Environmental Effects attempts to justify the compatibility of units on this site through reference to townhouses on the other side of Forest Way, a boarding house on Forest Way and another seniors living development approved at 34 Adams Street. With regards to these noted developments, the townhouses adjacent are on a much larger (and compliantly sized) parcel of land, do not feature basement parking, are set down on their respective site with significant setbacks and have the appearance of two storey detached villas. The boarding house approval on Forest Way was fought at length by Northern Beaches Council but lost in the Land Environment Court, and the other development at 34 Adams Street is on a more conventionally proportioned block of land with a North South orientated block so any overshadowing falls onto the road, and its height complies with the DCP control (has no basement carpark and the approval notes a 6.2m maximum height, with predominantly single storey appearance with loft bedrooms in attics).

The proposed development being located on an elevated corner block is visually prominent and will have the appearance of a multi-unit residential development with long facades to the Adams Street frontage and a two and a half storey appearance when viewed from the east due to excessive height which breaches DCP wall height plane. I note the complete lack of RL's on the section drawings with regards to parapet and ceiling heights, and that there are no ground levels or floor RL's in the submitted plans. I question why this information has not been provided and urge Council to insist upon its provision in accordance with documentation standards required to assess development. Using the survey information provided and scaling sections using Bluebeam software to provide accuracy, the east façade sits at existing ground RL of 149,300. The proposed ceiling height (measured – not declared) is RL 156,700. The building wall/ceiling height is therefore 7.7m ie. a half meter breach of DCP height requirement. The compliance table on the cover page of the drawings claims DCP height complies but it is in breach. This breach in height creates increased overshadowing of 47 Forest Way private open space and rear facing windows, and in actual fact extends all the way to 45 Forest Way.

This increased height will also dominate our single storey residence to the east and the balconies overlook our bedroom window and terrace. We note that in this revised DA all privacy devices have now been removed from the eastern façade meaning balconies and windows will have a direct line of sight into our master bedroom and our only covered outdoor space on front balcony.

The proposed setback of 3.5m to the 28m length of Adams Street frontage is also out of character with the existing front setbacks along Adams Street – shown overleaf to be typically in the order of 10m on average. This includes two local heritage listed houses to the direct east of the site that the Statement of Environmental Effects has remained silent on and are contributory to the prevailing streetscape. The 3.5m setback control proposed is for domestic scaled houses on corner allotments. The proposal will dominate the visual character of this more suburban side of Adams Street and will be exacerbated by its two and a half storey appearance viewed from the east approach.





Extract from DA submitted plans showing location of breach of DCP height requirements due to Basement garage and building form not being stepped to the slope of the land.



Aerial image showing prevailing 10m setback line along south side of Adams Street

### Loss of visual and acoustic privacy

The proposed development significantly intensifies the existing development on the subject site and will result in overlooking of private open space, bedrooms and living areas and noise, specifically to our residence at 25 Adams Street but also to our neighbours at 47 and 45 Forest Way.

Of particular concern to our family as immediate neighbours to the development is visual overlooking from the proposed first floor residence to our shared front boundary. The statement of environmental effects and submitted Clause 4.6 for breach of minimum site area requirement incorrectly asserts that there will be no visual connection between our premises and the proposed development. This is incorrect and fails to take into consideration the NWN orientation of our residence to the street and the proposals east façade elevation which is not at a 90 degree relationship to our façade but less acute. As a result there are clear unobstructed sight lines from the proposed developments upper floor windows and balcony directly into our master bedroom and also our front porch - which I note is the only covered outdoor space and we have. The current residence at 49 Forest Way has a rear façade of more than 20 meters from our boundary. The proposed development positions an *elevated* ground floor balcony 12.9m from our boundary - with no fixed privacy screening. The RL of proposed ground floor balcony is RL151,070 (sourced from section – not shown on plans) and our floor RL is approximately 147,000 meaning the proposed “ground floor” level is actually more than 2m above natural ground level on the east façade, and will look down on the front of our house being some 4m higher. If the building were stepped to suit the site and the ground floor plane not elevated these issues could be mitigated.

The proximity of the proposed ground and first floor windows and balconies will directly overlook our master bedroom. We are heavily reliant on leaving the curtains of this room open to provide natural sunlight and warmth to our residence as well as enjoying the leafy outlook created by the deciduous street trees which create a delightful environment to the room. The resultant development will mean that we will always potentially have a neighbour looking directly into our master bedroom whenever the curtains are open. The tree outlook we presently enjoy will be destroyed with the removal of trees for the new driveway. This driveway will be clearly visible from our bedroom and living room windows and headlights will penetrate these spaces at night time with no barrier.

Our neighbour at 47 Forest Way have presented similar concerns to ours as their backyard private open space will be overlooked, again from an elevated ground floor balcony and the first floor balcony. The front of their house including several windows is also overlooked by Unit 1 and 3 bedroom balconies.

The proposed development is reliant on contravention of the minimum site area requirement and asserts that there is no impact. This is incorrect and therefore there should be no leniency permitted to the controls. Council should refuse the development proposal outright. At a minimum any proposed windows or balconies with direct sight lines into our bedroom/living room windows should be provided with fixed vertical louvers to the full extent of the opening at a blade orientation that prevents overlooking.





Photo from our master bedroom to 49 Forest Way – there is already a sight line from our window to the existing residence – proposal will lead to significant overlooking and loss of privacy as new windows and balconies will be much closer in proposed location to current situation and prevent us from enjoying northern light

### **Acoustic Privacy**

Acoustic privacy and noise has been inadequately addressed in this development application.

A large development of this nature should include a detailed acoustic report to ensure the appropriate noise levels from the proposal does not affect the amenity of neighbouring dwellings. As stated above our master bedroom window is orientated in such a direction that there is a direct line of sight between the balconies of the proposal and our bedroom. Also of significant concern is the position of driveway ramp again which will mean vehicles entering and exiting the property and accelerating up the driveway ramp will cause a significant new noise source to our master bedroom potentially at all hours of the day. We will also have to contend with headlights shining through our windows as cars enter the driveway. Having lived in an apartment complex previously we are all too familiar with this noise source as well as the opening and closing of security doors. Our boundary fence is a heavily dilapidated timber fence and will provide little to no acoustic buffering from the elevated balconies of the proposal or the driveway. I also note that the lift is located externally to the building with no internal foyer/lobby space, presumably to reduce FSR calculations but to the detriment of future elderly or disabled residents. As such any noise from the lift will be transmitted directly towards 47 Forest Way.

The BASIX certificate notes that the living areas and bedrooms will be provided with air-conditioning. The basement carpark will also require ventilation and neither the air-conditioning nor the ventilation plant have been detailed in location or type in the drawings. Both of these items will potentially be a significant noise source particularly through summer when we leave our master bedroom windows open for passive ventilation.

Council should insist that a detailed acoustic report be undertaken including noise logging and a specification of the location and indicative selection of all mechanical plant equipment should be provided to ensure that there is no exceedance of background noise levels.

### **Overshadowing**

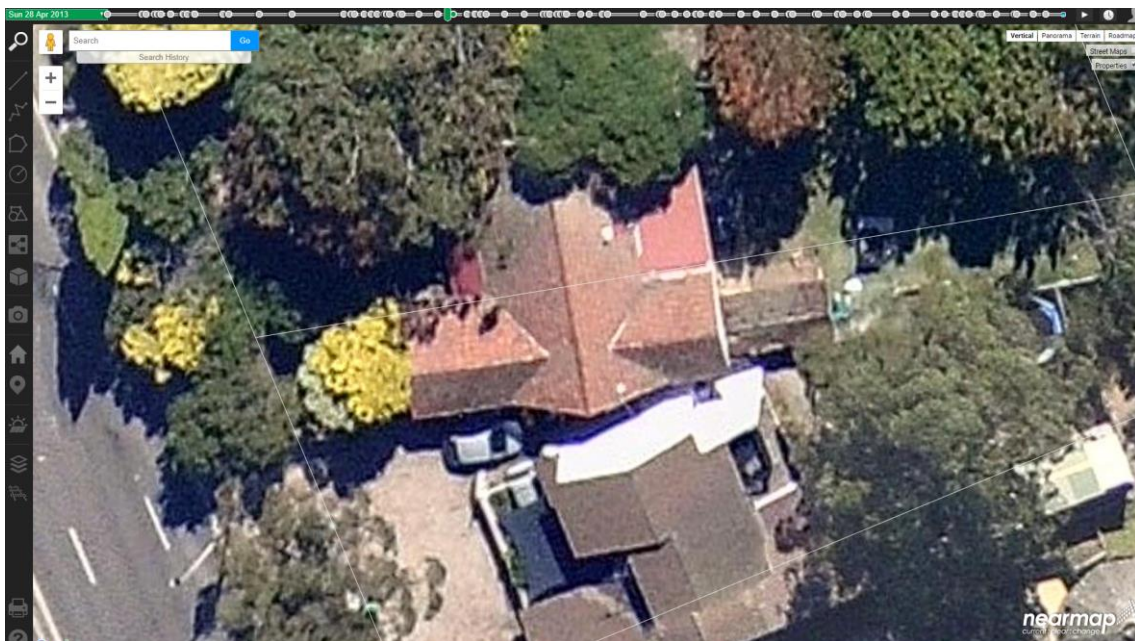
Contrary to the Statement of Environmental Effects and the Clause 4.6 in relation to lot size I would submit that overshadowing is a substantial concern should the proposed development be approved in its current form. Although this revised DA is an improvement on the very poorly considered previous application, the proposed development will still create increased overshadowing of both the private open space and the east facing living room windows of 47 Forest Way. The south eastern wall position of the proposed development is also the tallest wall element, and exceeds permitted DCP wall height due to basement carpark. This section of wall is still considerably further to the east than the existing residence at 49 Forest Way, noting that the small existing structure in the SE corner is only a single storey structure and stepped with ground plane/ The submitted shadow diagrams fail to take into consideration the two large existing eucalypt trees in the rear yard of 47 Forest Way (tree 16 identified in the arborist report and another larger eucalypt further to the west). These trees substantially shade and block early morning sun to the backyard private open space and ENE facing living room and bedroom windows such that the house is heavily reliant on later morning sun and early afternoon sun particularly through winter (from 10am to 1pm). As illustrated in the shadow diagrams the existing residence at 49 Forest Way casts no shadows on the east (backyard facing) façade or the backyard private open space between 12pm and 3pm. The proposed development will overshadow the east façade and backyard immediately outside the residence at 12pm and by 3pm the entire backyard is in shade whereas only half the backyard is shaded in the current situation.



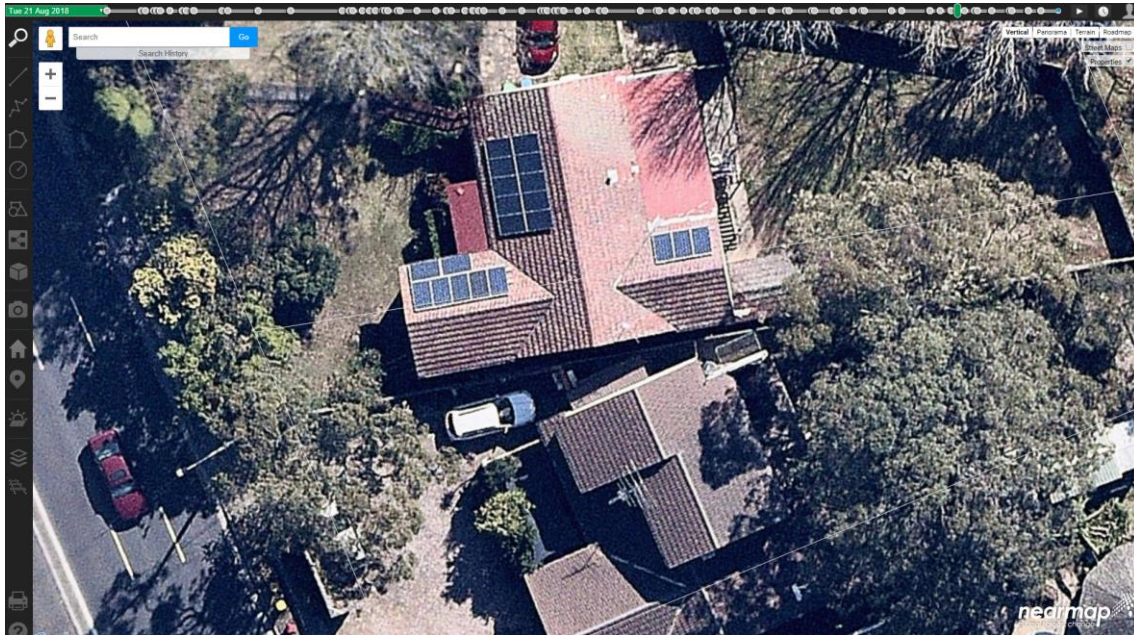
The application purports that there is no impact on 47 Forest Way as they do not have any windows in their north façade. Rather than ameliorating an impact this substantially increases the impact of the development as 47 Forest Way is so heavily reliant on mid-morning to early afternoon sun to achieve acceptable light into their ENE facing windows and backyard.

The submitted Clause 4.6 cannot substantiate that there is no impact to 47 Forest Way in relation to overshadowing. Indeed the non compliance with the control means overshadowing extends all the way into the back yard of 45 Forest Way as well. There is clearly a significant loss of sunlight and amenity which is unacceptable.

Lastly it is noted that neither the sections nor the elevations for the development provide RL's for the parapet walls/roof of the proposed development. These RL's should be clearly provided such that should any development approval be granted there is a clear definition of the approved height of walls that must be complied with. As it stands the development could easily vary the height of walls and roofs with no recourse to Council or the affected neighbours and this would exacerbate overshadowing issue. We have frequently seen this tactic employed to allow developers with flexibility in terms of the approval and given the significance of the overshadowing issues all roof and parapet heights and wall setbacks in any approval should be clearly nominated with fixed RL and setback dimensions, and a registered surveyor should provide confirmation of adherence to these prior to the issuance of any Occupation Certificate.



47 & 49 Forest Way 28 April approximately Midday (and equinox) – note that the east façade of 47 Forest Way is enjoying full solar access due to its ENE orientation, and the backyard immediately outside rear façade of 47 Forest Way is also in full sun – image courtesy of Nearmap



47 & 49 Forest Way 21 August approximately 9am (and one month after winter solstice) – note that the east façade of 47 Forest Way is fully shaded by the two large eucalypts in backyard, the only opportunity for solar gain in winter to east façade and backyard is between around 10am and just after midday. The proposed development of 49 Forest Way as a two and a half storey height will eliminate any possible solar gain to these ENE facing windows and the backyard private open space – image courtesy of Nearmap

## Traffic and parking

The proposal will create additional traffic on already heavily congested roads. Over the last eight years that we have lived in Adams Street, we have seen a rapid deterioration in traffic congestion on Adams Street and Forest Way. It often takes my wife up to 2 passes of the traffic light at the top of Adams Street before cars queued will allow her to back onto the road during the morning peak. There is significant congestion at the intersection with Greendale Avenue and frequently these cars are not able to turn right into Adams Street. Several residents in Greendale Avenue have spoken to us about their complete frustration in not being able to turn into Adams Street during peak hour. The new development with parking access immediately adjacent to this intersection will create further conflict and queuing. There have been numerous car accidents at the intersection of Adams Street and Forest Way. This is a dangerous intersection and higher vehicular movements in its immediate proximity will exacerbate this danger and intensify an already congested road.

Residential development will be much better served by the new road infrastructure around the hospital precinct where dual carriageways have been implemented. Developments such as this if left unchecked will increase congestion and continue to reduce amenity. Northern Beaches Council have recently revised downwards the proposed population density for Frenchs Forest for the very reason that the existing transport infrastructure is strained and there is not sufficient public transport options.





Typical morning peak hour, cars and buses queue for several phases of lights at top of Adams Street blocking our driveway from being able to be used (and the proposed new driveway).



Cars frequently queue all the way down to Rabbett Street during morning peak – new development with 6 car spaces close to this busy intersection is going to make this situation worse.



## Proximity of proposed driveway to 25 Adams Street driveway

Of specific concern to us is the proximity of the proposed new driveway to our own driveway. We note that the site plans and traffic report have failed to show our driveway which is very close to the alignment of the proposed new driveway. The proposed driveway actually extends past our shared boundary by 2.4m, meaning that all cars entering from a westerly direction on Adams Street will be visible turning into our driveway, and at night time headlights will be directed straight at our master bedroom and living room. The side fence will offer no protection and we will have to endure constant disruption and likely interrupted sleep. The proximity of the driveway will also further exacerbate the issues that we currently have getting into and out of our property.

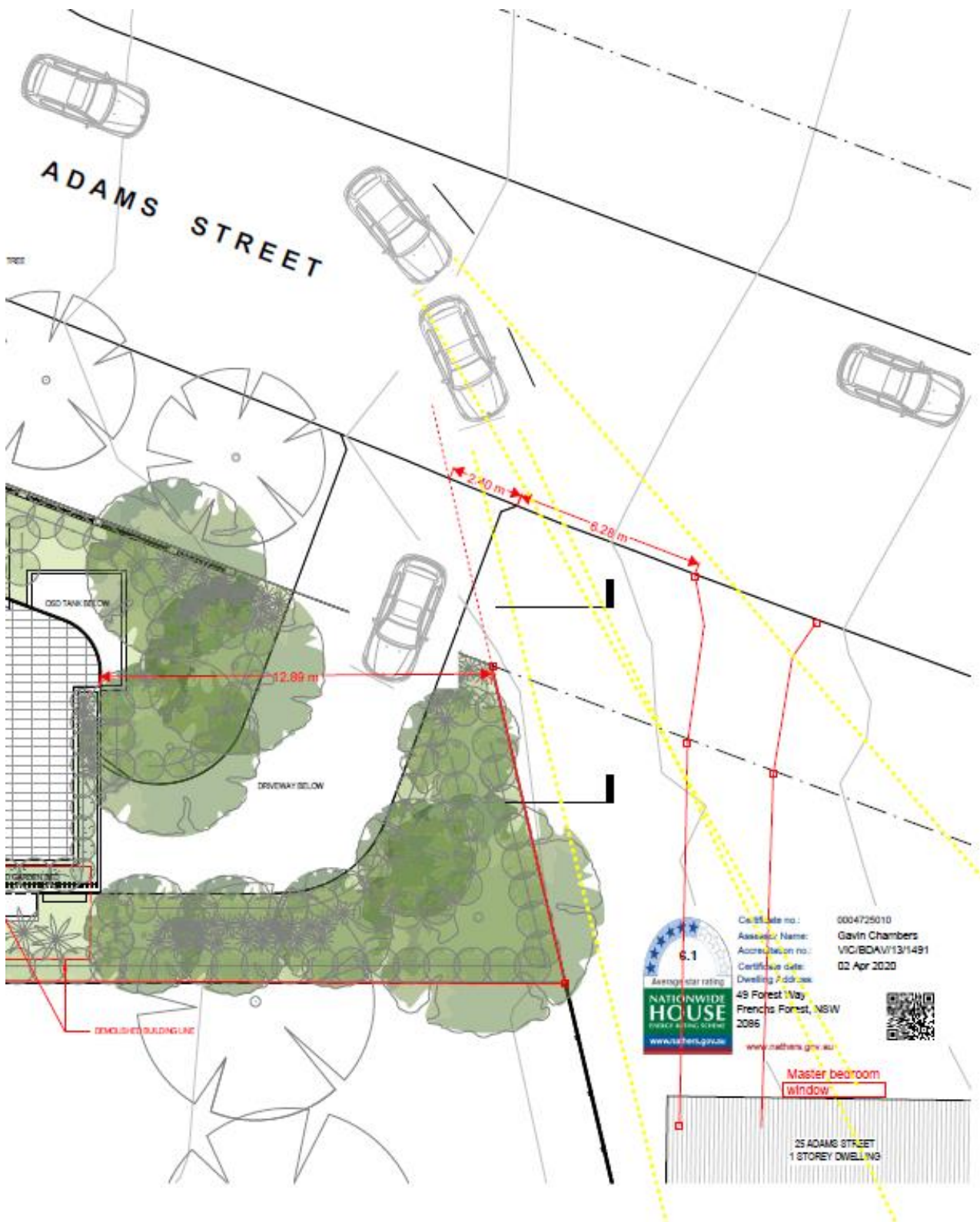
Should the development proceed the driveway entry must be moved west closer to its current kerb crossing alignment to avoid conflict with our property and also negate the requirement to remove the beautiful street trees that we enjoy and are so much part of the local street character. It is not adequate for the applicant to rely on removal of street trees and place a driveway wherever they see fit. The street trees are a real site constraint and the planning should consider them accordingly. Replacing a 20 year old mature tree with a 100L potted tree that will take decades to reach a similar height is not a reasonable outcome. The SEPP 2004 Clause 33, Chapter 3 Part 3 Division 2 states **(f) retain, wherever reasonable, major existing trees.**

Proposed driveway location should be moved further west to align with the existing "Keep Clear" zone marked on Adams Street and trees 1 and 2 should not be removed.



Red line is a projection of our shared boundary to street kerb. Blue line and watering can represents proposed location of the eastern edge of new driveway – 2.4m past the line of our boundary fence and only 6m from our driveway crossover. Headlights of vehicles turning into the driveway will be clearly visible from our bedroom and living areas with no fence blocking the light or sound.





Extract from Ground Floor Plan amended and scaled in Bluebeam. Our driveway superimposed in red onto plan (not shown in submitted drawings). Vehicles turning into driveway from west will direct headlights through master bedroom and living room windows. Driveway extends 2.4m past our shared boundary position, driveway only 6m from our driveway.

### Loss of significant tree 1 and 2 and impact on trees 3 and 16

The proposal will result in the loss of significant trees and severely impact and potentially destroy other trees in immediate proximity. I have discussed proposed impacts to trees with a senior registered landscape architect in our office to get their opinion of development impacts.

As mentioned above it is not reasonable to assume that street trees can be removed just to enable the applicants preferred driveway entry position. The Liquid Amber street trees (identified as trees 1, 2, 3 and 4) are an important characteristic of Adams Street and provide much appreciated shade to our front yard through the warmer summer months as well as a leafy outlook from our living areas and bedroom window. The arborist report indicates that all four of these trees have A1 retention value, but identifies that trees 1 and 2 will be removed regardless. As noted earlier the position of the driveway will mean loss of two beautiful trees, and the noise and headlights of cars coming straight into our master bedroom and living area. SEPP 2004 Clause 33, Chapter 3 Part 3 Division 2 states **(f) retain, wherever reasonable, major existing trees.**

Why should beautiful trees that both we and the neighbouring community enjoy the aesthetic benefit of be knocked over to benefit a sole developer. This is not in the best interest of the local community and assertions in the SEE too provision of more much needed aged care residential development clearly overlooks the current rate of vacancies in the local aged care facilities not even factoring in new development that will come on line with the rezoning works. Council should require a relocation of the driveway to protect the street trees in question and the removal of trees 1 and 2 should not be permitted.



Outlook from our living area showing trees 1, 2 and 3 and the beautiful autumn leaves and shade they provide our front yard and the street.





Trees 1 and 2 provide considerable visual amenity to Adams Street. Both trees listed with A1 retention value in arborist report. Proposed driveway should be relocated rather than demolishing high quality trees.

### Impact on Tree 16

The proposal will also have a significant impact on our neighbour at 47 Forest Way's tree identified in the arborist report as tree 16.

This 10m high lemon scented gum also with A1 retention value is located almost on the boundary of 49 Forest Way and within very close proximity of the proposed basement excavation. The SRZ and TPZ for this tree has not been indicated on the basement plan. Neither has the trunk nor its RL at base been shown but the basement ramp will require excavation of around 1.5m depth lower than this tree within very close proximity to its structural roots and well within the TPZ. The survey and arborist report have inadequately captured the detail of this tree which has a significant lean towards the north of around 6 meters, such that the canopy extends substantially over the development site (see image on next page). The survey has incorrectly positioned the canopy central to the trunk. I have discussed this tree with my landscape architect colleagues who have reviewed the relevant information and they have advised that due to the northern lean of this tree the main structural root zone will have a northerly bias and will not be located central to the trunk. As such the arborist report has incorrectly located the SRZ and encroachment is above 10%. Furthermore the proposed hand excavation around this trees TPZ and SRZ is unrealistic given that contiguous piling has been proposed for the basement which will be required to avoid undermining the footings of 47 Forest Way.

My landscape architect colleagues and they are of the opinion that the Tree 16 will be severely impacted by the development and would likely die or at a minimum become destabilised and pose a significant risk of falling onto the development root with loss of the northern root structure.





Photo illustrating significant lean of tree 16 towards the north. Proposed basement excavation and façade line severely impacts this tree.

Council should not allow development in such close proximity to Tree 16 and once again it calls into question the viability of this undersized lot to adequately address the impacts on surrounding area.





Photo showing boundary fence located inside our property line with substantial lean

### **Insufficient information**

The submitted development drawings do not have sufficient information to enable a proper assessment to be made.

I have reviewed the submitted plans and can honestly say I have rarely seen such lack of detail in a development application of this nature. In accordance with Northern Beaches Council's development protocol, floor plans should be provided that provide building, room and window dimensions and clear setbacks from boundaries. Wall construction types should be notified and floor levels and relative ground levels should be shown. Relationship of the proposal to existing trees and specifically the TPZ and SRZ should be shown on ground floor and basement drawings to enable an assessment of impacts to be correctly made. Sections and elevations should include heights of roofs, parapets and windows and a consideration of immediately adjoining residences so that a comparison of heights can be made. Site plans should show window locations of neighbouring dwellings such that assessment of overlooking and the like can be made. Where will air-conditioning units and the mechanical exhaust duct to the carpark be located? No mention of fencing has been made, what will our boundary fence with the proposed development be? Presently this is a dilapidated fence and if the northern return is removed it will probably fall over.

Similarly reports provided seem to have inaccuracies or assumptions have been drawn based on limited information available. The geotechnical report is now just a cover letter referring to the previous report which hasn't even been submitted this time. A geotechnical report should include

direction on how to prevent the basement excavation undermining the foundations of 47 Forest Way and minimise vibration which may cause structural cracking to our property and 47 Forest Way. The geotechnical report and arborist reports should be updated with regards to what is actually realistic with regards to tree 16. Dilapidation reports should be a mandatory condition of consent at the expense of the applicant.

An acoustic report should be provided in relation to noise impacts on surrounding residences.

The cost plan is ambitious to say the least, presumably deliberately lowballed to limit the cost of DA application fees and any Section 94 contributions. In my experience a development of this nature would cost well in excess of 2M to construct with unit construction running at a minimum of \$2500-\$3000/sq.m and basement carparking \$1000-1500/sq.m before demolition and site works are considered. Council should consider an independent audit of costings.

## Conclusion

We moved to Frenchs Forest to enjoy a peaceful lifestyle in a suburb defined by a leafy spacious quality, with its relatively modest houses on large blocks of land. Northern Beaches Council has shown their concern about the intensity of development in and around Frenchs Forest with the recent revisions to the Draft Structure Plan downgrading the number of new dwellings proposed for the region. This has been largely in relation to an acknowledgement of the lack of appropriate public transport, congestion on roads and concern about capacity of local infrastructure to meet increasing demands. Northern Beaches Council have also been conscientious in terms of their concerns in and around the development of boarding houses and the adoption of the new medium density housing code because of the increased pressure that these developments can put on existing infrastructure and their potential lack of compatibility with neighbouring low density residential areas.

Whilst I am supportive of the provision of additional housing within the Frenchs Forest region it should be done in a carefully planned manner and with due consideration to the proposed precinct plans rezoning. Seniors housing will best be accommodated with the uplift of the streets immediately in and around the hospital precinct or on appropriately sized/consolidated blocks of land that enable amenity to neighbouring properties to be maintained. This application does not achieve this outcome. It would be easy to imagine that with approval of sites such as this and lenience applied to site area controls, a growing precedent will be set for development of undersized lots. Ad-hoc development of undersized lots will exacerbate our already heavily congested roads, lead to stress on road and stormwater infrastructure, and create pockets of single residence houses surrounded by what is essentially multi-unit development in R2 zoned land.

I would urge Council to consider the importance of adherence to appropriate planning controls and refuse this development and not encourage a move towards a developer free for all. I would be very grateful for an opportunity to discuss the concerns outlined above regarding this development proposal with the relevant assessing planning staff on site at Council's convenience.

Regards,

**Andrew Tripet**

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