
Sent: 6/09/2017 2:48:25 PM
Subject: FW: Attn: Nick Armstrong -Submission by way of objection to DA N0373/17 -
13 A OCEAN ROAD PALM BEACH NSW 2108
Attachments: sla.sun14p3_submission.pdf;

From: Ishara Warakagoda [mailto:Ishara@turnbullplanning.com.au]
Sent: Wednesday, 6 September 2017 2:38 PM
To: Council Mailbox; Nicholas Armstrong
Cc: Sophie Litherland; Pierre Le Bas
Subject: Attn: Nick Armstrong -Submission by way of objection to DA N0373/17 -13 A OCEAN ROAD
PALM BEACH NSW 2108
Importance: High

Dear Nick,

Attached please find a submission by way of objection to development application N0373/17.

Should you need further information, please contact our office.

Thank you,
Kind Regards,


Ishara Warakagoda
BA (AUW), M Plan (WSU)
Town Planner



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5 September 2017

Chief Executive Officer
Northern Beaches Council
Civic Centre
725 Pittwater Road
DEE WHY NSW 2099

Dear Chief Executive Officer,

**DEVELOPMENT APPLICATION NO373/17
PROPERTY: 13A OCEAN ROAD PALM BEACH
PROPOSED CONSTRUCTION OF A SECONDARY DWELLING**

We are consultant town planners and act on behalf of James Slack of 14 Sunrise Road, Palm Beach ('our client's property').

1.0 BACKGROUND AND INTRODUCTION

Council is currently considering Development Application N0373/17 (the 'Development Application') lodged on 21 August 2017.

in respect of the site which seeks development consent for the construction of a secondary dwelling, new garden stairs and associated landscaping (the 'proposed development') on the land known as No 13A Ocean Road, Palm Beach ('the site').

Our client's property adjoins the site and is immediately to the south of the site, being situated at the rear of No 13 Ocean Road.

This submission constitutes an objection to the Development Application as lodged.

2.0 SITE LOCATION AND DESCRIPTION

The site, legally described as Lot 1 in Deposited Plan 121833, is located directly across the road from Palm Beach. Currently situated on the site is a one and two storey concrete block and steel clad residence with a metal roof and an attached garage which is located at the lower eastern end of the lot. The dwelling house has panoramic ocean and beach views from its living areas and bedrooms. Vehicular access to the site is via a concrete driveway from Ocean Road.

The site, which is generally irregular in shape with a total site area of 986sqm, has the benefit of panoramic beach and ocean views and is located on the western side of Ocean Road, with a secondary frontage to Sunrise Road at the rear and uphill of the site.

The site has a general fall to the east, with the lower portion of the site having a relatively gentle slope. Immediately to the rear of the dwelling house situated on the property is an existing escarpment, with protective shotcrete, which has a general height of 7-8m, with the site rising more gradually to the rear boundary facing Sunrise Road.

The site has a frontage of 19.715m to Ocean Road and northern and southern side boundaries measuring 48.475m and 57.16m respectively and narrows towards the rear, with the rear boundary measuring 11.47m.

3.0 THE DEVELOPMENT PROPOSAL

The Development Application proposes the construction of a new detached single storey secondary dwelling, new garden stairs and associated landscaping on the upper portion of the site facing Sunrise Road.

According to information contained in the Geotechnical Report prepared by Douglas Partners (see page 4 of their report), the proposed secondary dwelling would be erected on the slope to sit between outcropping bedrock shelves and to the north of a large detached sandstone boulder. Excavation along the upslope (western) side of the new dwelling is proposed to around 1m to 2m below existing slope levels.

Access from Sunrise Road will be by way of a stairway down the slope.

4.0 NATURE OF SUBMISSION

Having considered the site and its surrounds and the details of the Development Application currently before Council, including:

- the architectural plans (Drawings DA00.01-04, DA01.01-02, DA02.01, DA03.01-04, DA04.01-02, and DA05.01-02, Revision A) prepared by MacCormick & Associates Architects and dated 17 August 2017,
- the shadow diagrams (Project No 1408, DA06.01-04) prepared by MacCormick & Associates Architects and dated 17 August 2017,
- the submitted Statement of Environmental Effects ('SEE') prepared by Vaughan Milligan Development Consulting Pty Ltd and dated August 2017,
- the Geotechnical Report prepared by Douglas Partners Pty Limited and dated 2 August 2017,
- the Arboricultural Impact Report prepared by Landscape Matrix Pty Ltd and dated 17 August 2017,
- the completed Waste Management Plan on Council's standard form, and
- the various other documents and plans submitted to Council as part of the Development Application bundle of documents,

it is our view that the proposal, in its present form, does not warrant support and we are of the view that amendments should be made prior to Council determining the application. As mentioned above, this submission constitutes an objection to the Development Application as lodged.

This submission details the various ways the proposal lacks finesse and reasonable consideration for the amenity of surrounding properties, particularly our client's property.

The objection is based on various grounds detailed in the following numbered sections.

6.0 STATUTORY AND PDCP PROVISIONS

The relevantly applicable local statutory environmental planning instrument is *Pittwater Local Environmental Plan 2014* ('PLEP'). Further development controls are contained in *Pittwater 21 Development Control Plan 2014* ('PDCP').

The site is zoned E4 Environmental Living under PLEP.

The site is noted on Council's Geotechnical Hazard Map (W Hazard H1) and the Coastline Hazard Map (D Wave Inundation).

The erection of a secondary dwelling is a nominate permissible use with development consent in the E4 zone (refer item 3, land use table, Zone E4), subject to the discretion of Council and based on a merit-based assessment having regard to the matters for consideration set out in section 79C of the *Environmental Planning and Assessment Act 1979* (NSW) (the 'EPA Act'), the relevantly applicable development controls and zone objectives.

The E4 zone objectives are as follows (refer item 1, land use table, E4 zone):

- To provide for low-impact residential development in areas with special ecological, scientific or aesthetic values.
- To ensure that residential development does not have an adverse effect on those values.
- To provide for residential development of a low density and scale integrated with the landform and landscape.
- To encourage development that retains and enhances riparian and foreshore vegetation and wildlife corridors.

In our opinion, the proposed development is arguably consistent with the E4 zone objectives although we question just how well the ostensibly low density built form of the proposed secondary dwelling will be 'integrated with the landform and landscape'. Further, how is the development encouraging the foreshore vegetation and aesthetic values of the locality?

In the case of the Development Application, the proposed development is arguably consistent with such of the zone objectives as are of relevance to the development, but the bulk and scale of the proposed development, in conjunction with certain other features of the development and its adverse impacts, are important merit-based considerations that militate against consent being granted to the development in its current form.

The site is not listed as a heritage item nor is it within a conservation zone. However, the site is within the vicinity of a heritage conservation area (C6 – Sunrise Hill Heritage Conservation Area).

The site is identified as being within an area affected by Acid Sulfate soils (Class 5). In that regard, the proposal for the erection of the secondary dwelling on the site will involve some excavation of the site.

By virtue of PLEP, the maximum permissible height of a building that may be erected on the site is 8.5m. The maximum height of the proposed secondary dwelling will be 8.08m.

Secondary dwellings are not to exceed 60sqm or 25% of the floor area of the primary dwelling. The proposed secondary dwelling provides a floor area of 59.76sqm and therefore complies with the 60sqm maximum.

The subject site is identified as being within the coastal zone and therefore the provisions of *State Environmental Policy No 71 – Coastal Protection* ('SEPP 71') apply to the proposed development. Clause 7(b) of SEPP 71 outlines the matters for consideration set out in clause 8, which are to be taken into account by the consent authority when it determines a development application to carry out development on land to which the policy applies.

State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 also applies to the development proposal. We note that a BASIX certificate (Certificate No. 836180S_03) has been provided in respect of the proposed building works.

7.0 SITE SUITABILITY

The authors of the Geotechnical Report state (on pages 7-8 of their report):

The site will not tolerate uncontrolled disturbance and hence, control of foundation excavation and water runoff will be required. Localised instability could occur if the planning of the development does not have due regard for site conditions.

Based on the results of and observations of sandstone outcrops across the slope, it is considered that bedrock lies generally within about 0.5 m to 1.5 m of the existing slope surface. Therefore it is probable that at least some of the excavation for the residence will be within sandstone bedrock of at least low to medium strength.

The selection of excavation plant will need to pay due regard to the limited site access and the need to limit vibration, when excavating bedrock of low strength or greater close detached boulders on the slope or structures on neighbouring properties. A maximum level of vibration of 5mm/sec should be aimed for at the base of the existing structures beyond the northern and southern site boundaries.

It is recommended that a dilapidation survey of any residences, pathways, walls or other structures on adjacent properties within about 10 m of proposed excavations, be undertaken prior to commencement of the works. The dilapidation survey should fully delineate existing defects thereby allowing appropriate responses to be made should any claims arise from excavation and construction at the site.

Within the faces of the resultant excavation, sandstone of at least low strength is generally expected to stand unsupported. However should there be intersecting joints, highly weathered zones within the rock mass or pockets of deeper soil cover, there could be a potential for local block or minor slip failures. Similarly, there is the potential for undermining any boulders along the excavation line if they are underlain by soil or extremely weathered bedrock.

It is recommended that regular inspections by geotechnical personnel be undertaken during the progress of the excavation works with a minimum of one inspection for every 1. m drop in excavation level. These inspections should delineate areas of potential instability for additional slope support works. Any overlying sandy soils or extremely low strength sandstone exposed along the crest of the excavation cannot be relied upon to stand in the short term with batter slopes exceeding 1.5:1 (H:V) or long term at 2:1 (H:V). Additional support of the soils or extremely low strength sandstone would be required where this batter slope cannot be achieved. Such support could include a retaining wall, or shotcrete covering.

Downslope of the proposed works, any anchors/dowels or shotcrete reinforcement mesh that are uncovered but are not removed during the site drainage works will need to be assessed structurally and either replaced or protected to prevent future corrosion. Vine and weed growth should be removed as necessary to allow a structural assessment to be undertaken of the upper section of the shotcrete covered face (including the wall and drain that is reportedly constructed along its crest).

The builder should excavate trial pits around the sides of the large detached sandstone boulder that is lying immediately to the south of the proposed new residence footprint. Underpinning of the boulder to in-situ bedrock may be required if the pits indicate that it is currently bearing in soil.

All site works will need to be the subject of regular geotechnical inspections.

With respect, and bearing in mind that we are not engineers, there is little in the above which fills one with great confidence. True, the Douglas Partners report contains strict recommendations as to how to proceed but, as we read their report, there is no definite conclusion reached as to the suitability of the site for the proposed development.

Almost as a *non sequitur*, the author of the SEE states (on pages 16-17 of his report):

The works have been considered in the Geotechnical Investigation prepared by Douglas Partners, dated 2 August 2017 which supports the proposed works.

... ..

The report [prepared by Douglas Partners] concludes that the proposed developments are suitable for the site and the site can achieve the Acceptable Risk Management Criteria of Council's Geotechnical Risk Policy.

With due respect to Mr Milligan, we do not think that such statements can be so easily drawn from the contents of the carefully drafted Douglas Partners report.

We respectfully submit to Council that further probative material is required on site suitability before any consent is granted to the proposed development. In that regard, this is such an important matter that it could not, as a matter of law, be dealt with by way of the issue of a deferred commencement consent.

8.0 STORMWATER DISPOSAL AND SITE DRAINAGE

Further consternation is generated in the Douglas Partners report (on page 9) pertaining to stormwater disposal and site drainage:

There is a potential for significant groundwater seepage from all levels of the hillside, particularly during and following extended periods of wet weather. Some

of the soils on the mid-level area of the site were saturated at the time of the site inspections and there was seepage evident down the shotcrete covered face.

Therefore, it will be necessary to provide adequate sub-soil drainage on the slope to minimise moisture build-up around the new and existing developments.

It is recommended that all stormwater generated from the new developments on the site and seepage intercepted on the slope be piped to the Council system along Ocean Road. The builder and designers should, as a minimum, expose and assess the functionality of the existing pits and pipe work which are above and down the shotcrete covered face. Modification or replacement of the existing stormwater system may be required if it be deemed to be deficient for the stormwater volumes from the new development.

A long term build-up of orange-brown gelatinous sludge has been observed within the existing drains at the base of the shotcrete covered face where iron oxides have precipitated out of groundwater upon exposure to the atmosphere. This natural phenomenon is particularly common from groundwater or seepage emanating from shales or siltstones. Therefore, provision should be made in any new or existing drainage lines on this site for access ports to allow for periodic cleaning or flushing out (or "rodding").

At the very least, this is a matter that is so important that, in the event that a consent issues, it will need to be appropriately conditioned to address the issues referred to by Douglas Partners. However, the several issues, taken collectively, raise doubts about the suitability of the site for the proposed development.

9.0 PARKING AND ACCESS

Vehicular access to the site is via a concrete driveway from Ocean Road. We note that there is no access proposed from Ocean Road to the proposed secondary dwelling. As such, we question any reliance on on-street parking on Ocean Road for use by occupants of the secondary dwelling.

The controls require a minimum of 2 parking spaces for each dwelling. The author of the SEE states on page 21 of the document that the proposal will 'maintain the existing double garage with the existing driveway access from Ocean Road'. We note that there is no provision planned for off street parking in respect of the proposed secondary dwelling. The author of the SEE states (again, on page 21 of the document):

The existing access driveway to the site from Ocean Road will remain unchanged. Given the fall in site levels from Sunrise Road, the provision of off street parking and driveway access to and within the site is challenging.

As there is no ready alternative to provide for off street car parking, no additional car parking or driveway is proposed at this time.

... ..

Council's DCP suggests an additional off street car space should be provided for a secondary dwelling. In this instance, the challenging topography (long and steep climb/descent) and limited opportunity for level car parking space within the site restricts the ability to provide for additional off street parking.

As additional parking is available within Sunrise Road, the existing parking is considered acceptable in this instance.

With respect, the assertion that additional parking is available within Sunrise Road is almost risible. Further, to excuse a lack of provision for off street parking by reason of the 'challenging topography' is a bit rich when it is proposed to excavate to make provision for the erection of the proposed secondary dwelling. It is more a case of it being inconvenient, financially and otherwise, for the applicant to provide for, say, one additional off street parking space in respect of the secondary dwelling.

The lack of provision for any, in circumstances where there would now be two dwellings on the site, is potentially troublesome, especially in light of the close location of the proposed new dwelling to our client's dwelling house.

10.0 PRIVACY AND OVERLOOKING

Our client's property is situated immediately to the south of the site.

In our opinion, the privacy impacts have been understated in the SEE. There will be overlooking unless any consent that issues is appropriately conditioned.

However, as Senior Commissioner Roseth pointed out on more than one occasion, the need for screening devices is an indication of poor design: see *Meriton v Sydney City Council* [2004] NSWLEC 313 (discussed below).

There will be unacceptable privacy impacts for our client as a result of the proposed development by reason of the bedroom window of the secondary dwelling facing the south and directly over our client's dwelling house.

In the event that Council were to consent to the proposed development in its current form there would be a severe impact on the amenity on our client's property and the use and enjoyment of that property by our client.

In our opinion, the proposed development is contrary to the well-established general planning principle relating to privacy set out in *Meriton v Sydney City Council* [2004] NSWLEC 313. In that decision Roseth SC stated (at [45]-[46]):

When visual privacy is referred to in the context of residential design, it means the freedom of one dwelling and its private open space from being overlooked by another dwelling and its private open space. ...

... Overlooking of neighbours that arises out of poor design is not acceptable. A poor design is demonstrated where an alternative design that provides the same amenity to the applicant at no additional cost, has a reduced impact on privacy.

... Landscaping should not be relied on as the sole protection against overlooking. While existing dense vegetation within a development is valuable, planting proposed in a landscaping plan should be given little weight. ...

It is clear from *Meriton v Sydney City Council* and subsequent cases in which the planning principle has been fairly consistently applied that separation rather than landscaping is the main safeguard in the protection of privacy.

In *Davis v Penrith City Council* [2013] NSWLEC 1141 Moore SC confirmed, at [121], the following as the criteria for assessing impact on neighbouring properties:

How does the impact change the amenity of the affected property? How much sunlight, view or privacy is lost as well as how much is retained?

How reasonable is the proposal causing the impact?

How vulnerable to the impact is the property receiving the impact? Would it require the loss of reasonable development potential to avoid the impact?

Does the impact arise out of poor design? Could the same amount of floor space and amenity be achieved for the proponent while reducing the impact on neighbours?

Does the proposal comply with the planning controls? If not, how much of the impact is due to the non-complying elements of the proposal?

As Dickson C pointed out in *Rose & Sanchez v Woollahra Municipal Council* [2016] NSWLEC 1348 (19 August 2016) at [78]:

In applying these criteria *Meriton v Sydney City Council* [2004] NSWLEC 313 at [45] clarifies the scope of visual privacy in the context of residential design as: the freedom of one dwelling and its private open space from being overlooked by another dwelling and its private open space.

That is the heart of the matter – the freedom of one dwelling and its private open space from being overlooked by another dwelling and its private open space.

In this case, there is no doubt that the impacts arise primarily from the absence of any proposed screening devices at the rear of the site, where views and the loss of amenity and visual privacy are of paramount importance. In *Vescio v Manly Council* [2012] NSWLEC 1098 (24 April 2012) the Court, in assessing the impacts on visual privacy, had regard to the fact that, in addition to the height difference, outlook, and angle of view from bedroom windows, any overlooking would be from a bedroom where people tended to spend less waking time, which was a factor to be considered in assessing impacts on visual privacy. Accordingly, the learned Commissioners (Pearson C and O'Neill C) did not consider that the impacts on privacy were such as to require the deletion of those windows, or any screening.

However, in the case of the present development proposal, the impacts upon visual privacy and overlooking occur, as mentioned, at the rear of the site, where views and the loss of amenity and visual privacy are of paramount importance. The use and enjoyment of the rear area of our client's property area will be considerably diminished, and the loss of visual privacy acutely felt, when protective and ameliorative measures are not taken to minimise or prevent loss of privacy and overlooking. (As respects the assessment of the latter – namely, overlooking – Council's attention is drawn to the Court's decision in *Super Studio v Waverley Council* [2004] NSWLEC 91.)

We submit that our client has a reasonable expectation that their dwelling house and some of its open space area will and should remain private, and that landscaping and screening should not be relied on as the only means to protect against overlooking.

It is strongly submitted that, in the event that consent were to be granted to the Development Application in its present form, conditions should be imposed requiring

the installation of appropriate screening devices, given the adverse impacts on privacy that would otherwise ensue.

However, our client's strong preference and submission is that the Development Application and plans, in their current form, should be amended to reduce the bulk, scale and form of the proposed alterations and additions, and alter the position of windows that provide an opportunity for unacceptable overlooking.

11.0 OVERSHADOWING

We have perused and reviewed the shadow diagrams (DA06.01-04) prepared by MacCormick & Associates Architects and dated 17 August 2017.

As our client's property is immediately to the south of the site, overshadowing is already a problem. The proposed secondary dwelling would be located directly and immediately to the north of our client's property.

In the event that consent is granted to the proposed development in its present form, there will be an unacceptable increase in overshadowing of our client's property (in particular, the garden area): see shadow diagram DA06.02_A.

12.0 LOSS OF SIGNIFICANT TREES AND INADEQUATE LANDSCAPING

The Arboricultural Impact Assessment report prepared by Landscape Matrix Pty Ltd, has assessed a total of 28 trees potentially affected by the proposed secondary dwelling. The report concludes that as a result of the proposed development a total of 11 trees are to be removed. The removal of the trees will reduce the current visual amenity and landscape setting that the adjoining dwellings currently benefit from, as well as being inconsistent with the desired future character for the Palm Beach locality.

The landscaped design plan prepared by 'Volker Klemm Landscape Design has not provided sufficient screen planting between the proposed development and the adjoining dwellings resulting in an undesirable visual outlook from these dwellings. The proposal as noted provides an unacceptably low quantum of landscaped area and landscaping within its curtilage. This will result in harm to existing trees and vegetation, the wildlife corridor of which the site forms a part, and the character of the area.

The site has already been substantially cleared and further removal of significant trees raises concerns of the loss of wildlife habitats and further visual impacts. As far as this proposed land use is concerned both the loss of the significant vegetation is problematic given effect on local character and visual impact.

13.0 CONCLUSION

In assessing the impact of a development proposal upon a neighbouring property, what was said by Roseth SC in *Pafburn v North Sydney Council* [2005] NSWLEC 444 (16 August 2005), at [19]-[24], is, in our respectful submission, extremely helpful:

19 Several judgments of this Court have dealt with the principles to be applied to the assessment of impacts on neighbouring properties. *Tenacity Consulting v*

Warringah [2004] NSWLEC 140 dealt with the assessment of views loss; *Parsonage v Ku-ring-gai Council* [2004] NSWLEC 347 dealt with the assessment of overshadowing; while *Meriton v Sydney City Council* [2004] NSWLEC 313 and *Super Studio v Waverley Council* [2004] NSWLEC 91 dealt with the assessment of overlooking.

20 Five common themes run through the above principles. **The first theme** is that change in impact may be as important as the magnitude of impact. ...

21 **The second theme** is that in assessing an impact, one should balance the magnitude of the impact with the necessity and reasonableness of the proposal that creates it. ...

22 **The third theme** is that in assessing an impact one should take into consideration the vulnerability of the property receiving the impact. ...

23 **The fourth theme** is that the skill with which a proposal has been designed is relevant to the assessments of its impacts. Even a small impact should be avoided if a more skilful design can reduce or eliminate it.

24 **The fifth theme** is that an impact that arises from a proposal that fails to comply with planning controls is much harder to justify than one that arises from a complying proposal. People affected by a proposal have a legitimate expectation that the development on adjoining properties will comply with the planning regime. *[Emphasis in the original]*

In the case of the present development proposal:

- the change in impact on our client's property will be considerable, even if the magnitude of the impact is not (however, that is not to say that the magnitude of the impact will be minimal, for it will not be);
- the lack of privacy screening is unnecessary and unreasonable;
- our client's property, especially the northern side of the property which will receive the greatest impact, is quite vulnerable given the location of existing windows and orientation of the dwelling;
- the lack of attention in the design of the development proposal to the impacts of the proposed development on our client's property in terms of visual privacy and overlooking is relevant to the assessments of those impacts, for even a small impact should be avoided if a more skilful design can reduce or eliminate it; and
- the fact that proposal fails to comply with a number of important planning controls is much harder to justify than would otherwise be the case with a complying proposal.

In short, our client has, as Roseth SC pointed out in *Pafbun*, a legitimate expectation that the development to take place on the site 'will comply with the planning regime'.

In our opinion, the proposal the subject of the Development Application requires considerable modification so as to render it acceptable and consistent with the current

planning controls. However, in the event that Council is not minded to refuse the Development Application, but on the contrary approve the application in its present form, being a course of action which, in our respectful submission, would be inappropriate both as a matter of planning principle and law, then we respectfully submit that it is essential that appropriately worded conditions are imposed on any consent that issues to reduce the adverse impacts that would otherwise arise for our client from the carrying out of the development.

There are, however, legal limits to what a consent authority can do in terms of the imposition of conditions on a development consent. There is a considerable body of case law attesting to the proposition that circumstances can arise, and otherwise be such, under which conditions attached to a consent are 'so radical as to destroy the substance of the application': see eg *Parkes Developments Pty Ltd v Cambridge Credit Corporation Ltd* (1974) 33 LGRA 196; *Flower & Samios Pty Ltd v Mosman Municipal Council* (L & E Ct, Stein J, No 10097/93, 24 June 1993, unreported). The imposition of such conditions is tantamount to a refusal of the application, and the latter is, in any such circumstances, the only legally appropriate decision. *Refusal*—not a grant of conditional development consent.

We respectfully submit that, having regard to the nature, character, bulk and scale of the development proposal, and the likely impacts of the development upon the natural and human-built environments (and, in particular, on our client's property), the only legally appropriate course of action is to *refuse* consent to the Development Application in its current form.

Our client reserves his rights and entitlements.

Yours faithfully,

TURNBULL PLANNING INTERNATIONAL PTY LIMITED



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