



The General Manager  
Hornsby Shire Council

Dear Sir

**DA/1277/2017 - 95-97 Copeland Road & 14 Hull Road Beecroft - RESIDENTIAL - SENIORS LIVING - 18 INDEPENDENT LIVING UNITS**

The Trust objects to the amended plans on Council's website dated 17 January 2019. The main concern is still with the bulk and scale and resultant density of the proposed development. While the applicant may argue that the proposal complies with the prescriptive measures of the Seniors SEPP, it is easy to present a counter argument that the proposal does not satisfy the intent of Cl33 of the SEPP; that the proposal is not in sympathy or consistent with the characteristics of the low density residential, heritage listed precinct.

With respect to the rear of the site, the Trust strongly believes that the intent of all the subclauses in cl 33 of the Seniors SEPP have not been satisfied ; that the minimum setbacks and internal separations for the single storey housing complex proposed on the rear of the site are not characteristic with existing housing in the suburb. The rear of the site is the highest part and is prominent from Hull Rd in particular. It is important that the building form at the rear has reduced bulk and height and that the vegetative screening is of a high quality that is in harmony with the suburb.

The Trust's view is reflected in the landscaping plans where, while the landscape architect has attempted to present a vegetation mix that is in sympathy with the area, the garden beds he has been given to work with are severely constrained caused by the use of the minimum setbacks and separations between buildings. The proposed trees around the units are unlikely to remain more than 5-10 years because as the trees grow they will eventually be culled as they become a nuisance in their undersized landscaped plots. The end result will be a loss of complete tree cover at the rear of the complex where it is most needed for shade, privacy, windbreaks and aesthetics.

The prescribed setbacks are designed to apply to a variety of residential zonings which have varying densities. Beecroft has a special low density zoning in a heritage precinct with landscaping a key element. The Trust therefore questions why the bare minimum setbacks are considered sympathetic in Beecroft. If the applicant believes the minimum setbacks are in sympathy then the applicant should be able to justify it, explaining how the proposed setbacks and separations are sympathetic with the area. The Trust feels the applicant has prioritised development and financial return and attempted to design a sympathetic garden around the built form.

A similar argument can also be presented for the main building complex facing Copeland Road. While the height has been lowered and a unit deleted the complex it is still more characteristic of a medium density zoning, and not of a low density residential zoning. The Trust notes that the adjoining residents have focussed their comments on the landscaping facing Copeland Rd. They are in a better position to comment than the Trust because they are personally affected.

Another matter that should be considered in the assessment is the pending redevelopment of the historic house and large landscaped land adjoining at 99 – 101 Copeland Rd. The historic house on 99-101 Copeland Rd is the twin to the house on the subject land and was partly researched in the heritage report for 95-97 Copeland Rd. There is therefore an acknowledged nexus between the two properties. The Trust believes there is a need to apply the precautionary principle and seriously consider any cumulative effect to the future streetscape and heritage that is likely to occur along this lengthy stretch of Copeland Rd.

To summarise, the Trust believes the proposed development fails to satisfy the intent of Clause 33 of the SEPP, in that the proposed development is more characteristic of medium density development and not the low density development that makes Beecroft so special as a heritage precinct

Yours Sincerely  
Ross Walker  
President  
Beecroft Cheltenham Civic Trust

31 January 2019

Clause 33

### **33 Neighbourhood amenity and streetscape**

The proposed development should:

- (a) recognise the desirable elements of the location's current character (or, in the case of precincts undergoing a transition, where described in local planning controls, the desired future character) so that new buildings contribute to the quality and identity of the area, and
- (b) retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity and any relevant heritage items that are identified in a local environmental plan, and
- (c) maintain reasonable neighbourhood amenity and appropriate residential character by:
  - (i) providing building setbacks to reduce bulk and overshadowing, and
  - (ii) using building form and siting that relates to the site's land form, and
  - (iii) adopting building heights at the street frontage that are compatible in scale with adjacent development, and
  - (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and
- (d) be designed so that the front building of the development is set back in sympathy with, but not necessarily the same as, the existing building line, and
- (e) embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and
- (f) retain, wherever reasonable, major existing trees, and
- (g) be designed so that no building is constructed in a riparian zone.