



The General Manager
Hornsby Shire Council

DA/20/2021 - 5 Wongala Crescent, BEECROFT NSW 2119 - DEMOLITION OF EXISTING STRUCTURES - CONSTRUCTION OF 5 PART 6 STOREY SHOP TOP HOUSING

Dear Sir

The Beecroft Cheltenham Civic Trust objects to this proposed development on the following grounds.

Development standard for height of buildings.

The submitted documentation indicates to the Trust that a development designed to a 17.5m height limit is now acceptable with the new 16.5m height limit. There also appears to be a hurriedness by the applicant to submit the DA with the original and amended plans mixed together, causing some confusion for some members of the community. The documentation indicates to the Trust that the applicant at the time of lodgement in January 2021 should have been fully aware of the LEP being changed (4th December 2020), with the draft LEP changes on exhibition from early 2020, well before the applicant's pre DA meeting with Council in July 2020. The Trust strongly believes the applicant should not have submitted the original design based on the former 17.5 m height , but instead redesigned the building to conform better with the new reduced height limit. The Trust would prefer the DA to be withdrawn and new amended plans and documents relating to the 16.5 m height limit only, submitted.

The Clause 4.6 variation of the height limit.

The Trust does not support the Clause 4.6 request to vary the height standard. The variation is excessive even for a typical sloping site. If the design height was considered acceptable for the former height of 17.5m, to now argue it is suitable for a height limit one metre less is not supported.

The variation is considered to be incompatible with surrounding heritage buildings in the heritage precinct. With the existing tree removed where the driveway is proposed, the adjoining heritage item (No 150 Treasure House) will be adversely impacted by the bulk and scale of the proposed development. Standing in Wongala Crescent near the war memorials, the height difference and scale between the two buildings will be unacceptable. The documentation provided tends to hide this issue through selective tree positioning.

Boronia Cottage at 3 Hannah St has been identified by the Trust as worthy of heritage listing. Even if this shop is not individually heritage listed, any future development on this site is likely to have a lower height to match the adjoining sky line.

Arguing that the 3.8m retail height is a justification is not accepted as determining authorities have dismissed that argument in the past.

The top level of the development will in fact be visible from Hannah Street, which slopes up hill towards the traffic lights. The fact that the adjoining car park in Hannah Street has been identified as an open space plaza, will make the excessive height of the development very visible.

For the Clause 4.6 to state that the extra height is consistent with clause 1.2(2) of the LEP is not supported. A lower development would still be consistent with the clause.

To state that the extra height is consistent with the objects of the EPAAct is not supported. The Trust can easily argue that the opposite applies. In summary, the Trust believes a counter argument could be provided for every reason given by the applicant that supports the Clause 4.6 variation request.

Heritage

There are a number of shop fronts in Beecroft shopping precinct that are worthy of individual heritage protection. The Trust has requested that 1-5 Hannah St, the former Boronia Cottage, be individually listed as part of Council's current heritage review process. The Trust would like this building to be retained or perhaps incorporated into any future adjoining development. It is important that properties with heritage elements in the shopping centre are not adversely affected by new development. This includes incorporating clever design such as stepping down heights or scaling to avoid bulk. The Trust believes the proposed development does not fully address the heritage and potential heritage structures in the shopping precinct.

DCP requirement to provide pedestrian access to future plaza adjoining in Hannah Street

The Trust has concerns about how the difference in levels between the proposed development and the existing car park facing Hannah Street has been handled in the design. The proposed plaza is likely to be created at a level compatible with Hannah Street, so the current car park levels are unlikely to alter substantially. This means the subject development has to be creative to avoid a deep unfriendly canyon effect. The current design does not avoid these inappropriate issues. It would appear that the need to access the commercial floor space has taken precedence over an innovative, people-friendly design. A better design is required.

Cross ventilation

The Trust seriously questions the performance of cross ventilation for the four units B 101 – B401. The internal air shaft or void, located above the ground floor lobby area is likely to provide extremely restricted air flow for these units. The Trust considers this design is poor creating poor amenity with the bedroom window looking out into the void.

Driveway entrance

The Trust has safety concerns with the angled entrance to Wongala Crescent (not at right angles) and the width of the driveway. Perhaps a wider driveway may be better.

Communal open space

The communal open space is well under the recommended minimum area. Being on the roof top will have advantages but also disadvantages. The positioning of the spaces does create poor amenity for the two top units, such as in terms of loss of outlook and noise related uses.

Deep soil planting

The deep soil planting is well below the recommended minimum requirement. It would appear that deep soil planting has been sacrificed for additional parking below. The Trust feels this indicates that the site is probably overdeveloped by one level.

Design and amenity

The Trust believes the development could be better designed. It is considered too high for the heritage precinct. There is too much bulk facing Wongala Crescent. More thought should be given to the interaction and linkage to the car park / future plaza facing Hannah Street. The units at the rear have very poor amenity due to orientation, slope constraints and setbacks.

The Trust feels this development does not meet the threshold standard that the local community desire. It is considered not to be in the public interest. While it is not a simple development site with numerous constraints, the Trust believes a better design is achievable. As alluded to above, the Trust would prefer this DA to be withdrawn and a smaller development lodged, with one level removed as a minimum, and a design more in sympathy with the heritage precinct and the community's expectations.

Yours Sincerely

Ross Walker OAM
President

Beecroft Cheltenham Civic Trust

9 February 2021