

RE: SSDA 113872990 – 35-39 Darley Street East, Mona Vale

I object to this proposal and ask that it is rejected on the following grounds:

1. Scale and bulk are out of character

- An 8-storey, 28.6m building has no relationship to the surrounding streetscape, which is presently 1–3 storeys with occasional 4-storey buildings.
- The design is a single continuous 8-storey block across the site, with none of the breaks needed to preserve light, air or visual amenity for neighbouring properties.
- The site sits on the crest of the hill on Darley Street East. A building of this height will be visible on the ridgeline from surrounding streets, the golf course and the beach precinct — not just from its immediate neighbours.
- The justification for this scale rests entirely on a *projected* future character in which dozens of surrounding sites eventually redevelop to similar height. That is not a basis to approve this building now; it approves a future that hasn't happened yet, on the promise that everyone else will follow.

2. The affordable housing bonus does not stand up

- The 30% height and FSR bonus that takes this building from 6 storeys to 8 is granted in exchange for only 9 of 53 apartments (15%) being affordable, and only for 15 years.
- The extra two storeys are permanent. The affordability commitment is not. After 15 years, the "affordable" units revert to full market rate and the bonus height stays on the skyline forever.
- On the Applicant's own \$78.1M estimated development cost for 53 apartments, that is roughly \$1.47M per unit before land value. A development at that cost point is not meaningfully solving affordability for nurses, paramedics, police or other key workers — it is using a small, time-limited affordability commitment to unlock permanent additional height and yield.
- If genuine, lasting affordability cannot be demonstrated, the height and density bonus that comes with it should not be granted either.

3. Traffic and parking impacts are understated

- 124 spaces for 53 apartments is roughly 2 per unit, which does not properly account for the larger 3- and 4-bedroom units in the mix, several of which will have more than one licensed driver and multiple vehicles.
- The Transport Impact Assessment considers this development in isolation. It does not properly account for the cumulative effect of this and other LMR developments proposed or approved nearby, all adding traffic to a street network that already carries heavy local and beach-access traffic, particularly in summer.

4. Loss of mature trees Of 42 trees assessed on and around the site, only 5 are proposed to be retained. 37 mature trees, including established canopy trees, will be removed. Replacement planting cannot replicate this within any meaningful timeframe.

5. Loss of solar access The Applicant's own solar assessment confirms Unit 2 at the adjoining property, No. 33 Darley Street, will lose its minimum required winter sunlight as a

result of this development. Six apartments within the new building itself will receive no direct winter sun at all.

6. Construction noise and vibration are expected to exceed limits The Applicant's Noise Impact Assessment states plainly that construction noise is expected to exceed NSW EPA limits and that vibration may also exceed acceptable limits given the proximity of the works to neighbouring homes.

7. Density breach under the LEP The site permits a maximum of 13.39 dwellings under Clause 4.5A of Pittwater LEP 2014. The proposal is for 53 — an exceedance the Applicant seeks to resolve only by invoking a Clause 4.6 variation rather than by reducing the scheme.

For these reasons, I ask that SSDA 113872990 be refused, or that the Department require a substantially reduced height and density that reflects the site's actual context and delivers genuine, permanent affordability rather than a temporary trade for permanent height.

I reserve the right to add an addendum to this submission.

Robert Goetti, 5 Kariboo Close, Mona Vale, 3/8/2026