

Amy Watson

C/- Amber Nehal

Amber.nehal@planning.nsw.gov.au

NSW Dep Planning, Housing and Infrastructure

REF: : APPLICATION NO. SSD-47105958
At : 24A KINGSCLIFF STREET, KINGSCLIFF, NSW 2487
Subject : PUBLIC SUBMISSION & DOCUMENTATION REVIEW COMMENTS

Further to the above noted SSD application, I would hereby like to formally submit my public submission and objection to the proposal as submitted. My submission is my assessment and review of the application and documentation and reports made publicly available on the NSW planning portal. My assessment outlines my concerns with the proposal based on my knowledge of the requirements and guidelines in which the proposal has been based as well as the proposal in its surrounding context and public domain.

I am a local resident and in close proximity to the proposed development. We will be both directly and indirectly impacted by this proposal and I would like to raise the following key points of concern.

1. **Bulk, scale and height of the development proposal.**
2. **Density and use of 4-storey-built form in this location**
3. **Privacy Impacts of the proposal**
4. **Solar impacts and shading**
5. **Traffic, Flood, Noise & Light Pollution Implications**

1- Bulk, Scale & Height of the Development Proposal.

The development as proposed is grossly over scaled, height and bulk in the direct surrounding context in which is proposed. The proposal seeks a for a variation to modify the maximum height set out in the TLEP. Surrounding each boundary of this property are low-set residential dwellings or smaller scale multi-dwelling townhouses of 2 storey average effective height. The proposal will completely 'dwarf' these homes, doubling their height. The large-scale footprints of each of the proposed building will significantly add longitudinal scale, with an extremely large unbroken façade and building length, comparatively to all other development at close proximity to the site. Even the larger multi-residential unit blocks that have been built in the Kingscliff locality, all comply with the TLEP 2014 height limits and have much smaller scale building footprints and lengths/width of façade, which a breakup of scale of development allowing for much more visual breaks within building form and passive solar breaks throughout. This is greatly attributed to the smaller site size of all other multi-residential land.

Personally the views of the skyline and afternoon sunsets will be all but lost due to proposed height of the development which will have a significant impact on quality of amenity to my family and street as a whole. The front deck was intentionally designed with a westerly aspect for afternoon sun and passive surveillance of the street and skyline beyond.

In my opinion this information should be re-reviewed and provided in a more practical easy to review format that truly reflects the proposal in context and impacts to all directing neighbouring boundaries.

2. Density and use of 4-storey-built form in this location

The development as proposed a greatly increased density in a low or low-medium density setting. The proposed density is not suitable in this location and is considered a complete overdevelopment and overidentified development on a site not suitable for the proposal.

The density proposed will put substantial pressure on surrounding infrastructure and neighbouring homes, streets and community setting. These pressures include, increased noise, traffic demands, light pollution, pedestrian movement and flood pressures. Current Infrastructure do not facilitate a development of this scale within the locality.

3. Privacy Impacts of the proposal

The development as proposed in its locality and to the height and scale proposed will have a significant detrimental impact on the liveability to surrounding residential homes and residences. The development proposed extremely large 4 storey structures, a mere 9m from the rear boundary of the adjoining properties, with little consideration of privacy impacts to these properties. The height of the proposal and orientation of windows and balconies will result in a complete overlooking into neighbouring yards and private open space.

4.Solar impacts and overshadowing

The development as proposed in its locality and to the height and scale proposed will have a significant detrimental impact on the liveability to surrounding residential homes and residences. The development proposed extremely large 4 storey structures, a mere 9m from the rear boundary of the adjoining properties, with little consideration of overshadowing impacts to these properties. The height of the proposal and rear setbacks to neighbouring boundaries will create significant overshadowing to the subject properties private open space. A number of the adjoining open space has been designed to the North or North West or North East orientation with the rear yard and open space receiving sunlight throughout a majority of the day to maximise passive solar design. The overshadowing will create a significant reduction in the sunlight received and have an impact on a number of private open space and objectives of the DCP, ADG and LEP with respect to passive solar design.

The proposed landscape plans show large scale mature trees to be planted between the proposed structure and neighbouring fence lines to create privacy requirements, these have been omitted from the shadow diagrams, however will have a significant impact and create large overshadowing on the neighbouring properties.

It would be suggested that each of the impacted dwellings be correctly modelled and shadow diagrams demonstrate compliance. This may be accurately demonstrated with a large scale plan (1:200) or similar with roof of dwelling removed to show angle of shading or elevations on the adjoining façade to show the shadow impacts on windows or the like. The shadow diagrams should accurately depict the current levels, height difference and proposed land heights.

5.Traffic, flood, Noise & Light Pollution Implications

The development as proposed will put significant pressure on an already pressured low density neighbourhood.

Traffic

The current Beach Street roundabout and beach street is a very busy intersection and main thoroughfare for lower Kingscliff area. During peak times (which photos in the traffic study do not depict) is very busy street with residents parking on the side of street and also it being a main bus route. The proposed traffic for the added residents, as well as staff and services vehicles is going to greatly

increase the number of vehicles coming into not only Beach Street access handle but Kingscliff in general. The current roads and infrastructure will not handle this amount of daily traffic and it will put significant pressure and busyness to the adjoining streets and neighbourhood, making it dangerous and not suitable for the locality.

Flood

During the recent major flood event, the site in which this was proposed as well as Beach Street and neighbourhood streets- Drift Court and the like were severely impacted by the flood waters. The low set topography of the site acted as a refuge or flood storage area for flood waters. The proposal is to fill the site which results in, the water being dispersed elsewhere, likely surrounding dwellings which is of great concern to these property owners as well as surrounding homes that were near rising flood waters in the previous floods.

The proposal does not adequately propose to deal with those flood waters in the event of a major flood, only deal with stormwater generated by the development.

Noise & Light

Based on the increased density of the proposal will come increased noise & light from residents, staff and services.

A majority of the open space from the proposal is on balconies and around the rear boundaries adjoining neighbours' properties. This will result in balcony lighting, security lighting, noise from residents using these spaces directly affecting the amenity of the existing residences' private space and bedrooms. The services vehicles and staff will also add noise given the proposal size, scale and requirements to service the site and man hours of staff doing shift work. There will likely be heavy noise and vehicle pollution at all hours of the day for staff parking, delivery refuse trucks etc.

Thank you for the opportunity to make this submission, and trust that is clearly understood and is met favourably.

Yours faithfully

Mrs Mallory Jardine
Resident- Drift Court, Kingscliff