

General Manager
Central Coast Council
&
Minister for Planning and Public Spaces
Via: NSW Planning Portal

Attention: Renah Givney and Paul Scully

Dear Renah and Paul,

**Re: Submission – SSD-69773460
Residential & Commercial (Mixed use)
35-37 Dwyer Street and 372-374 Mann Street, North Gosford**

1.0 INTRODUCTION

For background purposes, Perception Planning (PP) is a business and development consultancy specialising in Town Planning (Development Assessment and Strategic Planning), Project and Environmental Management, Building Surveying and Stakeholder Engagement. PP's ethos is to achieve balance between compliance with the legislative controls and achievement of good planning and development outcomes.

On this basis, Perception Planning Pty Ltd has been engaged by Phil Kingsmill (the client) to independently review the proposed State Significant Development Application No. SSD-69773460 (the application) and to subsequently prepare this submission (objection).

The bulk of PP's work is preparing applications and Planning Proposals, and typically PP doesn't complete a large amount of submissions. We often only agree to become involved in the preparation of submissions if we have concerns with the quality or adequacy of the information within the application, or if we genuinely believe the proposal is pushing the boundaries too far and does not result in a good planning outcome. Whilst every application is assessed on its merits, our belief is that some variations are acceptable on merit, however when too many variations are proposed, it can be considered an overdevelopment of the site and is typically indicative of avoidable negative effects on the amenity of the surrounding area.

As PP always advise clients prior to engagement for submissions, if the proposal is permissible, we won't be able to stop the development, nor is that the intention. The intent is to achieve a better planning outcome that better responds to the site and reduces the impact

on our client's properties. It is considered that design amendments suggested would significantly reduce the amenity impacts raised within this submission. The client is seeking an amicable compromise to the proposed development, to ensure the environment in which it is located is protected in perpetuity.

Our review of the application has been based on the information that is available from the NSW Planning Portal Major Projects Hub during the notification period, ending 7 October 2025, which includes but is not limited to:

- Environmental Impact Statement (DFP Planning, 10 July 2025)
- Appendix AA – Social Impact Statement (Sarah George Consulting, 12 May 2025)
- Appendix B - Architectural Drawings (Curzon + Partners, 23/04/2025)
- Appendix C - Statutory Compliance Table (DFP Planning, July 2025)
- Appendix D – Community Engagement Table (DFP Planning, July 2025)
- Appendix DD – Engagement Report (Sarah George Consulting, May 2025)
- Appendix GG – City of Gosford Design Advisory Panel Session Outcomes (28 May 2025)
- Appendix H – Architectural Design Report (Curzon + Partners, June 2025)
- Appendix N – Landscape Plans (Site Image, 23 June 2025)
- Appendix Q – Transport Impact Assessment (Ason Group, 30 May 2025)
- Appendix S – Noise and Vibration Impact Assessment (Renzo Tonin & Associates, 16 April 2025)
- Appendix V – Civil Engineering Plans (Smart Structures Australia, 11/02/2025)

2.0 SUMMARY

The following points provide a historic summary of the application and other applicable matters:

1. DA/49565/2016 was originally lodged on 31 March 2016 and was refused by the Hunter Central Coast Regional Planning Panel on 26 October 2020.
2. An Application under Section 8.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) was lodged on 14 September 2021 and subsequently withdrawn on 02 June 2022.
3. These two previous applications were subject to the following issues of concern:
 - The s8.2 Review application was not substantially the same as either the original proposal or the previously refused version
 - Incompatibility with the context and setting of the locality
 - Excessive height, bulk, and scale
 - Amenity impacts including visual impacts, noise, overshadowing, and privacy
 - Poor built form and adverse visual impact
 - Traffic impacts and lack of suitable pedestrian movement

4. A State Significant Development application (the subject of this submission) was lodged with Council on 11 August 2025.
5. The site comprises four lots located on the Northern extremity of the Gosford City Centre on the corner of Mann Street and Dwyer Street and is known as the Northern gateway location to the city centre.
6. The proposal is for a mixed-use development that includes three distinctive building masses consisting of one large highrise tower (72.45m in height) and two other large building masses (between 25.19m and 25.69m in height). Utilisation of the exception to height and floor space provisions in Section 5.46 of *State Environmental Planning Policy (Precincts – Regional) 2021 (SEPP PR)* is proposed. This results in a development that far exceeds the prescribed maximum height of buildings control (18m and 36m) under the Central Coast Local Environmental Plan 2022 (CCLEP), does not successfully integrate into the context of the locality, and does not adequately mitigate the many adverse impacts on the area identified.

The project is for the construction of a mixed using development including;

- three buildings ranging in height between seven (7) and 21 storeys;
 - a total of 249 apartments comprising:
 - 81 x 1 bedroom apartments;
 - 137 x 2 bedroom apartments;
 - 31 x 3 bedroom apartments;
 - a ground floor commercial premises (213m²);
 - three (3) to six (6) levels of basement including 353 parking spaces; and
 - public domain works to Dwyer Street and Mann Street.
7. This objection raises the following issues of concern:
 - Traffic impacts
 - On-street parking impacts
 - Noise impacts
 - Excessive height, scale, and building bulk
 - Visual impact
 - Population density and increased load on infrastructure and services
 - Incompatibility with and inconsideration of character of the area
 - Crime, safety, and social impacts
 - Pollution and environmental impacts due to construction and ongoing traffic activity.

3.0 LEGISLATIVE REQUIREMENTS

3.1 Environmental Planning and Assessment Act 1979

Division 4.15 – Evaluation

8. It is our view that the Environmental Impact Statement (EIS) is inadequate in addressing the requirements of Section 4.15 of the EP&A Act and does not enable proper consideration of the application by Council. Section 4.15 states:
- (1) Matters for consideration—general*
In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application—
- (a) the provisions of—*
- (i) any environmental planning instrument, and*
 - (ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
 - (iii) any development control plan, and*
 - (iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and*
 - (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),*
 - (v) (Repealed)*
- that apply to the land to which the development application relates,*
- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
 - (c) the suitability of the site for the development,*
 - (d) any submissions made in accordance with this Act or the regulations,*
 - (e) the public interest.*
9. Pursuant to Item 1(b), (c) and (e), the EIS must address in detail the likely impacts of the development, the suitability of the site and the public interest. The EIS provides minimal discussion of any potential negative social or economic impacts, which is further addressed in detail below. It rather highlights the many positives it could result in, which leads to a one sided and unbalanced assessment of the proposed development.
10. To this extent, the submitted EIS and other supporting documentation should not be relied upon due to its improper assessment. Prior to any further assessment, we

request specifically that the EIS and supporting documentation be updated and amended to incorporate a detailed and unbiased assessment of the relevant sections of the EP&A Act and matters of consideration, particularly in relation to the likely impacts on both the natural and built environments, and social and economic impacts in the locality, the suitability of the site for the development, and how the proposal aligns with the public interest.

11. Upon comparison of the current plans against the previous two applications which were refused and withdrawn respectively, the current proposal presents similar built form and massing, albeit via a perceived 'staged' development whereby the previously proposed additional buildings have been omitted from this application whilst still being shown in some plans submitted as an attempt to reduce or mask the perceived impacts of the development on the area.
12. The proposal remains similar to the previous applications in height, mass, and site layout. As such, the adverse impacts identified during the previous assessment remain and are not considered to have been adequately addressed. In fact, the proposal appears to result in amplified adverse effects on the surrounding locality.

3.2 SEPP (Housing) 2021 - Chapter 4 Design of residential apartment development

13. Chapter 4 of SEPP Housing 2021 provides that in determining an application for a residential flat development, that the consent authority must take into consideration a number of matters relating to design quality, including nine design quality principles and the Apartment Design Guide (ADG):
14. In regard to principle 1 'context and neighbourhood character' good design should respond and contribute to its context and area including existing and future desirable elements of an area's character.

The site adjoins a large area that is characterised by low density residential development. While the site is identified as the northern gateway to the Gosford City Centre and therefore a transition is anticipated, the proposed buildings are a sheer vertical transition, resulting in a stark contrast to its surroundings that does not positively contribute to the locality. It therefore cannot be said that the proposal adequately responds or positively contributes to the context of the area.

15. Principle 2 refers to 'built form and scale' and requires good design that is appropriate to the area. Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook. Good design includes appropriate setbacks, articulation and building elements as well provision of a positive contribution to the streetscape and good internal amenity for building occupants.

Given the severe adverse impacts such as overshadowing and visual impact, there is no reasonable justification for any of the proposed buildings exceeding the height of

building limit respective to each site (36m for building A and 18m for buildings B and C).

While the height of buildings map does facilitate two taller buildings to create a gateway to the city, the proposal seems to have taken advantage of this idea to create a gross overdevelopment without due consideration or respect for the height limit prescribed or permanent impacts on the surrounding area and residents.

Overall, the built form is poor, and the scale is out of context, resulting in an abrupt transition from R1 zoned land (with a height of buildings limit of 8.5m) to the proposed development, being a highrise tower with a height over 72m. It is noted that conceptual building masses surrounding the proposal have been shown within the architectural plans and Visual Impact Assessment provided within the Architectural Design Report in an attempt to reduce the perceived visual impact of the development.

16. Principle 3 refers to 'density', with good design being able to achieve a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context. Appropriate densities are consistent with the area's existing or projected population. Appropriate densities can be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities and the environment.

The proposal provides 249 apartments consisting of 81 x 1 bedroom apartments, 137 x 2 bedroom apartments, and 31 x 3 bedroom apartments. Upon full capacity residency, the proposal would accommodate 421 residents plus visitors.

The facilitation of almost 500 users and the dramatic increased load on the already strained local infrastructure network cannot be underestimated, even when considering future planned upgrades such as those mentioned within the Transport Impact Assessment for example.

Particular areas that are experiencing overwhelming demand for which the addition of 421 residents would not assist include childcare, healthcare, and public transport.

Notwithstanding the assessments provided as part of the application, the extreme exceedances of the proposed FSR and building height in addition to the significant civil works required suggest a gross overdevelopment of the site that does not align with current or projected future infrastructure upgrades.

This indicates a density that is out of scale with the existing local conditions in terms of character, environment, social fabric, and available infrastructure systems.

17. Principle 4 refers to 'sustainability', which means that good design combines positive environmental, social and economic outcomes. Good sustainable design includes use of natural cross ventilation and sunlight for the amenity and liveability of residents and passive thermal design for ventilation, heating and cooling reducing reliance on technology and operation costs. Other elements include recycling and reuse of

materials and waste, use of sustainable materials, and deep soil zones for groundwater recharge and vegetation.

As a clear overdevelopment of the site resulting in an unreasonable intensification of residential density, the proposal does not represent a sustainable solution and is not considered to be of a scale that is consistent with the existing or desired future characteristics of the area.

18. Principle 6 refers to 'amenity', which means that good design positively influences both internal and external amenity for residents and neighbours.

In regard to internal amenity, it is noted that the floor space ratio for building A of 6.48:1 far exceeds the prescribed FSR of 4:1, demonstrating an unacceptable and excessive exceedance to this parameter, which is a key parameter in ensuring adequate residential amenity in terms of making suitable space available for residents to carry out day to day activities in an acceptable and safe environment. It is noted that the FSR exceedance relies upon clause 5.46, however as detailed within section 3.3 of this submission, the site area does not enable use of this exception. With site area being directly linked to available space to provide an adequate FSR, the proposed FSR cannot be considered acceptable and does not meet the requirements of the LEP, ADG, DCP, SEPP Housing, or SEPP PR.

Regarding external amenity impacts on neighbours, significant concern is raised about the excessive height, bulk, and scale of the development which will have severe amenity impacts on neighbours.

Due to the height and density of the proposal, amenity impacts on neighbours extend far beyond those that a more compliant and more considered development would.

Upon review of the ADG Design Principles provided within Appendix H, it is noted that the applicant's assessment of principle 6 'amenity' makes no mention of amenity impacts for neighbours. It is clear to see from this omission and upon review of the architectural plans that minimum consideration for neighbours has been undertaken and that the proposal does not adequately mitigate the many identified adverse impacts such as overshadowing, overlooking and privacy, visual impact, and undue increased strain on infrastructure.

Due to the excessive height and overall bulk of the proposed buildings, overshadowing will affect a large area of the surrounds, resulting in permanent adverse amenity impacts for neighbours by depriving entire properties of natural sunlight. As with the visual impact assessment provided, the shadow diagrams show an entire precinct of conceptual development, seemingly in an attempt to offset the perceived impact of the extensive overshadowing that will take place. The height of buildings limit is a key indicator of the acceptable and desired building height and subsequent overshadowing within specific areas. As the proposal far exceeds the prescribed building height limit and clause 5.46 cannot be utilised due to insufficient site area, the overshadowing created by the proposal is in direct contradiction with the amenity impacts considered acceptable or reasonable in this location

19. Principle 9 refers to 'aesthetics' which means built form has good proportions and a balanced composition of elements. A variety of materials, colours and textures should also be used. The visual appearance of well designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.

While the proposal is suitably articulated and detailed in the façade design, the extreme height and building mass cannot be overlooked, as it presents a gross overdevelopment that is out of context with the desired characteristics of the area.

The proposed development is considered detrimental to the streetscape and the gateway to the city centre.

3.3 SEPP (Precincts - Regional) 2021 – Chapter 5 Gosford City Centre

Part 5.8 Gosford City Centre

5.45 Design Excellence

20. This clause addresses design excellence. The objective of this clause is to ensure that development exhibits design excellence that contributes to the natural, cultural, visual and built character values of Gosford City Centre. In considering whether development exhibits design excellence, the consent authority must have regard to the following matters:

- (a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,*
- (b) whether the form and external appearance of the development will improve the quality and amenity of the public domain,*
- (c) whether the development is consistent with the objectives of sections 5.52 and 5.53,*
- (d) any relevant requirements of applicable development control plans,*
- (e) how the development addresses the following matters—*
 - (i) the suitability of the land for development,*
 - (ii) existing and proposed uses and use mix,*
 - (iii) heritage issues and streetscape constraints,*
 - (iv) the relationship of the development with other development (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,*
 - (v) bulk, massing and modulation of buildings,*
 - (vi) street frontage heights,*

(vii) environmental impacts such as sustainable design, overshadowing, wind and reflectivity,

(viii) the achievement of the principles of ecologically sustainable development,

(ix) pedestrian, cycle, vehicular and service access, circulation and requirements,

(x) the impact on, and any proposed improvements to, the public domain.

The proposal is not considered consistent with items i, iv, v, vi, vii, ix, or x above due to the excessive bulk and height in close proximity to the surrounding R1 zone adjacent. The proposed height and FSR far in excess of the limits prescribed by the LEP result in unreasonable impacts on the adjacent R1 zoned land and connecting shared infrastructure. The site area does not enable suitable development of such height, mass, and density to occur without unreasonable amenity impacts for the surrounding context.

The proposal does not achieve a high standard of architectural design given its non-compliance with the height of buildings limit, non-compliance with the floor space ratio limit, and non-compliance with aspects of the ADG principles which result in amenity impacts for residents and neighbours including visual impacts and overshadowing.

The large amounts of glazing across all building elevations will result in significant solar glare and heat island effect impacts on residential neighbours and on the streetscape.

While the lots on the corner of Mann Street are identified as gateway sites, the proposal goes beyond the gateway site, and the proposal is therefore much larger than was ever envisaged for this entry to the city centre.

There is no relationship with the character of the surrounding locality or consideration of adverse amenity impacts.

The proposal disrupts the natural skyline of the surroundings landscape and view corridors.

The proposed development departs from these matters and therefore does not comply with this clause of the SEPP.

5.46 – Exceptions to height and floor space in Zones B3, B4 and B6

21. As per section 4.6 of the EIS, the proposed extreme building height and FSR exceedances rely upon clause 5.46 of the SEPP Housing, however the site does not meet the criteria (area) to enable use of this clause as detailed below.

(3) Development consent may be granted to development on land to which this section applies that results in a building with a height that exceeds the maximum height shown for the land on the Height of Buildings Map, by an amount to be determined by the consent authority, if—

(a) the site area of the development is at least 2,800 square metres but less than 5,600 square metres, or the building will have a street frontage of at least 36 metres, and

Comment: The site is zoned B4 under the Precincts and Regional SEPP; therefore, the provisions of this clause apply. Appendix C of the lodgement package does not include an assessment of this clause, rather states 'N/A'. Combination of Lot 4 DP 15954 and Lot 5 and DP 15954 to facilitate construction of proposed Building 1, have a combined area of 1,570m² and a combined street frontage of 34m. As such the proposal does not meet the requirements of 5.46(3)(a) and an exemption to the height of buildings limit cannot be applied.

- (b) a design review panel reviews the development, and*
- (c) the consent authority takes into account the findings of the design review panel, and*
- (d) the consent authority is satisfied with the amount of floor space that will be provided for the purposes of commercial premises, and*
- (e) the consent authority is satisfied that the building meets or exceeds minimum building sustainability and environmental performance standards.*

(4) Development consent may be granted to development that results in a building with a height that exceeds the maximum height shown for the land on the Height of Buildings Map, or a floor space ratio that exceeds the floor space ratio shown for the land on the Floor Space Ratio Map, or both, by an amount to be determined by the consent authority, if—

- (a) the site area of the development is at least 5,600 square metres, and*

Comment: The lots where the proposed Building 1 is located (as detailed above) have a combined area of 1,570m². As such the proposal does not meet the requirements of 5.46(4)(a) and an exemption to the height of buildings limit or FSR limit cannot be applied.

- (b) a design review panel reviews the development, and*
- (c) if required by the design review panel, a competitive design process is held in relation to the development, and*
- (d) the consent authority takes into account the findings of the design review panel and, if held, the results of the competitive design process, and*
- (e) the consent authority is satisfied with the amount of floor space that will be provided for the purposes of commercial premises, and*
- (f) the consent authority is satisfied that the building meets or exceeds minimum building sustainability and environmental performance standards.*

Notwithstanding the above, the proposed building height and FSR exceedances from the limits prescribed by the CCLEP are excessive and are demonstrated to result in severe adverse effects for a large area of the surrounding locality.

3.4 Central Coast Local Environmental Plan 2022

Clause 2.3 Zone Objectives and Land Use Table

22. Zoning objectives - the proposal is located on land zoned B4 under the SEPP Precincts – Regional 2021, however the site directly adjoins land zoned R1 General Residential to the North and East. Therefore, as the site is located at the interface of these two zones it must be designed to have greater regard for the objectives of the R1 zone – particularly the objectives which seek to ensure that development is

compatible with the desired future character of the zone and to promote best practice in the design of housing.

Concern is raised regarding the abrupt transition between the proposal and adjoining land uses, noting the lack of available space for traffic, parking, and services as well as the significant adverse impact on the existing low density residential fabric of the area. This will result in adverse visual impacts from undue building height and bulk, negative urban streetscape treatments, noise impacts from a large number of balconies and extended streetscape and overlooking.

The development design needs to be compatible with the existing and desired future character of the area, achieve best practice in the design of dwellings, and importantly, must achieve a reasonable level of amenity for all.

The proposed development does not demonstrate best practice design through a lack of consideration for surrounding existing site context.

Clause 4.3 Height of buildings

23. While the proposal relies upon exemptions as per SEPP PR 2021 which is discussed in section 3.3 of this submission, the height of buildings limits as prescribed by the Central Coast LEP 2022 and the intent behind them must be considered as below.

Site A

- CCLEP 2022 Height of Buildings Limit – 36m
- Proposed Building Height – 72.45m
- Exceedance = 36.45m or 101.25% (double)

Sites B and C

- CCLEP 2022 Height of Buildings Limit – 18m
- Proposed Building Height – 25.69m
- Exceedance = 7.69m or 42.7%

In regard to building height, it is noted that all three proposed buildings exceed the maximum building heights applicable by extreme amounts.

Compliance with the development standard is not considered unreasonable or unnecessary in this instance and given the obvious impacts of the height on surrounding land uses, particularly those adjacent the site in Dwyer St and Hills St. These impacts include visual impacts, noise, and privacy, for which there are not sufficient environmental planning grounds to justify the contraventions.

There are examples of residential flat buildings within proximity to the proposal that achieve an appropriate balance between providing adequate housing whilst considering the existing and desired character of the area and mitigating any adverse environmental impact on the surrounding context.

The proposed height of the development is not warranted when reviewed against the relevant objectives which include to provide an appropriate transition in built form and

land use intensity. The height transition is not sufficiently addressed and the adverse impacts of this are shown in the image below.



Clause 4.4 Floor space ratio

24. While the proposal relies upon exemptions as per SEPP PR 2021 which is discussed in section 3.3 of this submission, the floor space ratio (FSR) limits as prescribed by the Central Coast LEP 2022 and the intent behind them must be considered as below.

Site A

- CCLEP 2022 FSR Limit – 4:1
- Proposed FSR – 6.48:1
- Exceedance = 36.45m or 200.25% (double)

Sites B and C

- CCLEP 2022 FSR Limit – 2.75:1
- Proposed FSR – 2.14:1

4.0 OTHER MATTERS

4.1 Community engagement issues raised and social impact

As evidenced by the Community Engagement Table and subsequent Engagement Report provided as Appendix D and Appendix DD, a large number of community members have raised the same issues being:

- Traffic impacts
- On-street parking impacts
- Noise impacts
- Excessive height

- Visual impact
- Population density and increased load on infrastructure and services
- Incompatibility with and inconsideration of character of the area
- Crime and safety impacts
- Pollution and environmental impacts due to construction and ongoing traffic activity
- Psychological impacts and social impacts

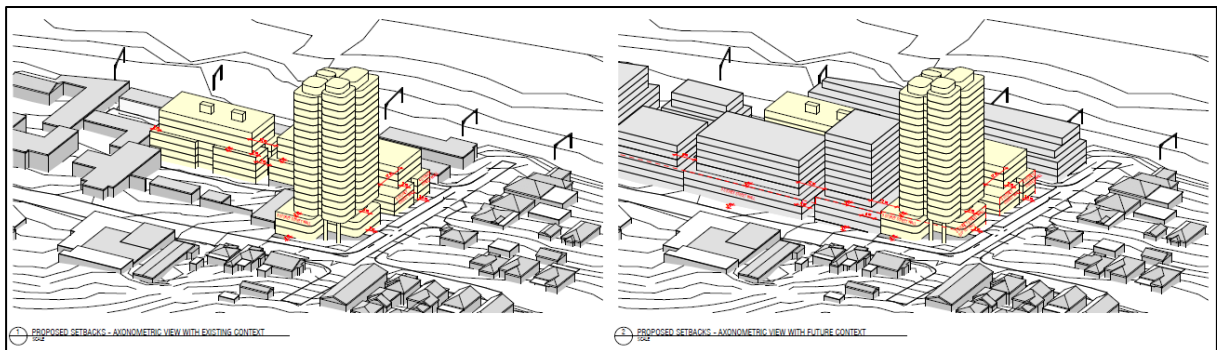
While responses to community concerns have been provided, they have been done so retrospectively and reactively rather than adopting a proactive approach by having community members considered when preparing the development design. As a result, the proposal appears as a gross overdevelopment that makes no consideration for the many adverse impacts it will have on the locality.

4.2 Assessment of proposal in relation to future concepts and masterplans

It is noted that much of the provided assessment has been prepared in relation to and consideration of future concepts and masterplans within the locality, none of which have been formally proposed.

This is particularly evident upon review of the visual and overshadowing impact assessments, for which the inclusion of future concept plans such as below mask and reduce the perceived impacts of the development on the character of the locality.

Even when considering the proposal in the context of future surrounding concepts, the gross overdependent and associated adverse impacts are clear to see.



5.0 CONCLUSION

Despite being refused and withdrawn multiple times in the past for the same recurring issues, the development still presents as an accumulation of large building masses including one large highrise tower that dwarfs the adjoining residential areas.

Overall, the extreme exceedances of height and FSR contribute to a gross overdevelopment that is out of place within the existing and desired character of North Gosford.

The adverse environmental impacts and lack of integration with the current or desired fabric of the locality remain key issues that have not been addressed through the current proposal.

The lack of consideration in the ADG assessment for the surrounding context does not demonstrate that it provides acceptable amenity to existing dwellings in the surrounding area, therefore these properties don't and will not achieve acceptable amenity. The development will result in significantly increased traffic and pedestrian movements in and around Mann and Dwyer Streets and concern is raised particularly in regard to safe pedestrian movement, traffic congestion, and parking availability.

Due to the excessive height, density, bulk, scale, external and internal amenity impacts (visual impacts, noise, overshadowing, and overlooking), increased load on infrastructure and services, and general lack of design excellence in responding to surrounding site context, the proposal also fails to comply with objective c) and g) of the *Environmental Planning and Assessment Act 1979* which require to promote the orderly and economic use and development of land, and to promote good design and amenity of the built environment.

Numerous other shortcomings have also been identified against the objectives of the Central Coast LEP 2022, Gosford City Centre DCP 2018, and the ADG with respect to zone objectives, consideration of existing context, and alignment with the desired built form of the area.

While the development has been reduced in footprint, the height and building mass densities has been increased and remain incompatible with the low density land zoning adjacent, presenting as a gross overdevelopment of the site that would adversely affect the existing residents and visitors to the area.

Due to the numerous and significant issues identified above, we therefore request that this application be refused.

Thank you for taking the time to review this information. If you have any questions, please contact me at matt@perceptionplanning.com.au or on 0437 195 264.

Kind regards



MATT BROWN Director
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