

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I support the harbord hotel proposal and i own property in Undercliff Rd.

Submission Type

I am making a personal submission

Title**First Name**

[REDACTED]

Family name

[REDACTED]



Name withheld

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Email

[REDACTED]

Suburb/ Town

Narrabeen

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Thank you for letting me make a submission on this. I live at Narrabeen however i think this application is positive for the freshwater locality. this hotel known by many as the Harbord Hilton in the past though new patrons probably dont know it now as this. anyway i support this application and it will also assist with accomodation in freshwater. its not overpowering and is very samll scale considering what is built in freshwater. so lets get this approved and on to the future.
cheers

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Family name

[REDACTED]



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Email

[REDACTED]

Suburb/ Town

Dee Why

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submission

The series of applications by Harbord Hotel has progressively ensured degradation of the residential amenity for the Freshwater locality. The applications have included misinformation and inadequate assessment of issues that are directly relevant to protection of residential amenity at the location. There should be no further rubber stamping of totally inappropriate applications by an aggressive developer.

Local residents surrounding the Hotel are now more significantly impacted by increased numbers of patrons exiting the Hotel late at night - an impact that would very obviously arise but was not fully assessed due to the misinformation in previous application, for only

50 additional patrons (proponent's statement) that has turned out to be several hundred extra patrons and those several hundred can all be additional to exiting boisterous patrons late at night, a situation that is totally out of step with a determinating authority's obligation to protect residential amenity. The misinformation in the proponent's SEE flowed through to inadequate assessment by Council and eventual approval despite the obvious negative consequences.

The latest application seeks to INCREASE the bulk and extent of the Hotel premises within residential area, by CONSUMING part of the existing residential area. The historic existence of the Hotel allowed its continuity. However, a proposal for a new Hotel in residential area would I believe be prohibited. The claim for residential land to be drawn into the Hotel premises is to my mind converting residential amenity into licensed premises and is not defensible - It is not required for any local amenity purposes and the Hotel is not reliant on having that land- It has more than enough capacity for its activities in the close surroundings of the residential area.

For Government to allow this application to be approved is to sanction degradation of residential amenity and to have dumped any notion of protection for residential amenity. It furthers the unreasonable decisions that have been gained by the inconsiderate and in my view, selfish developer who only wishes to squeeze every last dollar out of the project for its own benefit without regard to the local community.

No approval should be given to the inclusion of the currently residential area into the the Hotel lands

There should be - NO APPROVAL, for hotel accommodation and pubs on Lot 6, Section 1, DP 7022

Submission Type

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Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

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Email

[REDACTED]

Suburb/ Town

Freshwater NSW 2096

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No

☒

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submission

As a resident of Undercliff Rd for the past 20 Years I strongly object to this proposed Hotel/Motel as it is not consistent with the character of the area, residential surrounds and is not consistent with the heritage look of the current hotel. This area is currently zoned R2Low Density Residential and rezoning the property in 64 Undercliff Rd is of concern as the loss of residential housing the area, Freshwater does not need a 37 room hotel/motel with a pool on the roof.

With the current change that have been made to the Harbord Hotel the neighbourhood has been suffering from anti social behaviour from its patrons, the younger partiers, drunk and urinating on neighbours lawns, vomit on footpaths and in gardens of neighbours properties, plus extra traffic that the current hotel has already created will increase even more with the hotel/motel this will have a very

large impact on parking particularly on Undercliff Rd that is already experiencing parking problems and every more so during the summer period. The public transport in this are is not sufficient to cater with the influx of extra people. Freshwater is a low density residential family area and doesn't need a motel of 37 rooms. Accomadation like this is better suited to the Manly area not Freswhater.

I strongly object to this development and the rezoning of 64 Undercliff Rd. This will negatively impact fellow resident of undercliff Rd and the neighbouring streets of Freshwater as a whole

Submission Type

I am making a personal submission

Title

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First Name

[REDACTED]

Family name

[REDACTED]



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Email

[REDACTED]

Suburb/ Town

Freshwater

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submission

TO: The NSW Planning Department

We strongly Object to the amendment of WLEP2011 to include a Motel. The Harbord Hotel (HH) has the privilege of being able to operate a PUB on R2 Residential zoned land in a R2 zoned area. As long time Residents of Freshwater we know that by making this amendment to allow for the Pub activity it was never the Council's Intention that the PUB be turned into a version of "Coogee Bay Hotel" with Live Bands/Nightclub/Music Studio and now with proposed 37 Room Motel and large outdoor elevated Pool. (We note in the prelim meeting with the council that the Environmental Officer expressed concerns about noise due to live entertainment and said

the applicant should engage with neighbours as adding Accommodation could lead to amenity concerns.

The Applicant/Developer/Owner has made it quite clear what their intentions are for the proposed Motel to serve as an extension of the existing Pub that provides a performance space and promotes musicians; The HH applied to the 24Hr Commissioner Michael Rodrigues and received Dusk Down Funding to Promote Local Business. The Commissioner has confirmed that this does not change existing Alcohol Licencing or operating hours. Freshwater is NOT part of the 24hr economy. Freshwater is NOT a special entertainment precinct or entertainment precinct in fact it is NOT a precinct and the inadequate infrastructure/Geography and Residential zoning would prevent it becoming so. The HH previous DA to nearly double the floor space and increased capacity to over 700 people has now been completed and with its opening an increase in antisocial activity in the Freshwater basin and its winter. I note that we have heard the Hotel wishes to extend the Hours of Hotel to 2am. Honestly when do Residents Sleep. Where does it end.

We would like to add his proposal will have a negative impact on the whole of the Freshwater Basin every road that leads to the beach and as Freshwater is a basin the noise will travel around the whole area and the notification area should have been extended to include the whole Freshwater Basin.

We have the following concerns:

Housing:

There is a well documented Housing crisis and it would be difficult for any Government to justify removing housing (three Rented Units) at 64 Undercliff Rd for a Motel. There is an abundance of temporary self contained accommodation in Freshwater which does not cause any undue impact on the area and adds to the economy and would be much more pleasant to stay in for visitors than a 20m/21m square box as are many rooms in the HH proposal, This Motel is to be used as accommodation for Functions/Conferences/Live Music Events all this surrounded by R2 Residential Area.

Infrastructure/Congestion/Parking:

The Infrastructure in Freshwater is not able to cope with this or any other new development of this scale. There are 4 new Housing and shop Housing Developments and hundreds of new residents making their way in and out of the Area and well as an ever increasing number of Trucks servicing commercial Business. The main street on the village centre Lawrence/Albert is congested and it is forcing large Trucks and cars into the back streets like Undercliff Road and Soldiers Avenue. The proposed HH developments will force more large loud Trucks into Undercliff Road and all other Streets carrying Laundry/Supplies/Alcohol/Garbage. As the applicant has made clear that the proposed Motel will be used to support events and activities at the Hotel then we can expect there would be many more Vehicles to the area which will have to park and the additional 30 odd spaces proposed by the applicant will not make any real difference when you are talking about proposed 37 rooms and Vehicles associated with the activity - performer/roadies/equipment, In summer months the roads are gridlocked and people drive round and round the streets looking for parking that is not there until they give up and go elsewhere - this is the reality that everyone knows well. The streets are full of cars from people who work in the Area - the Freshwater Village has had to set up roller doors on the Moore Road that don't open to the public until after their own staff have been able to park, The Staff from the HH have to park somewhere as well as there is only 1 Bus at night 167 which carries about 70 people and last Bus in about 12'20am. When there are 700 plus people trying to get home and

poor transport they drive. More cars mean more congestion and more parking issues. This is NOT about "NOT IN MY BACKYARD" this is about the realities of the Geography and Transport system in Freshwater and the difficulties of moving around curving and hilly narrow roads which are difficult for Buses and Trucks. The Transport report provided by the applicant is grossly inadequate and not useful to assess this application.

Noise and Smell:

Noise from intoxicated people-noise from music-noise from Trucks especially refrigerated trucks that sit parked for lengthy times unloading with engines running-noise from Exhaust running all day and night- noise from compressors-noise from Kegs of Beer being dropped on the ground-noise from the large elevated outdoor pool. There is a cumulative effect to noise every addition leads to further lost amenity and as offensive noise is measure against background noise when that background keeps increasing then it means people have to live like prisoners in there own homes with doors and windows closed in order to sleep and not wanting to sit on their balconies or in yard as the noise make it unpleasant. The smell from Exhausts is becoming a real issue in Freshwater I would say it's extremely offensive at peak times and I think there needs to be a greater emphasis on ensuring regular serving of these units as well as the smell from ever increasing number of grease truck extractions which generate both noise and smell, What's being proposed by HH is not in the public or community Interest and will lead to lost Amenity for all who live and visit Freshwater. One of the Aims of the WLEP 2011 is Ei is to "ensure that non-residential development does not have an adverse effect on the amenity of residential properties and public places" we all know that people attending Functions cause increased antisocial Behaviour. I also note in this proposal that there is the added Mechanical ventilation from the underground carpark so would have the pleasure of this added noise and carbon dioxide.

Antisocial Behaviour:

I concur with my neighbours regarding the increase in late night noise, broken glass, urination on property, vomit even during the late afternoon and we can look forward to this getting even worse when the second level of HH opens. Many Pubs stopped the live music for a reason because it lead to an increase in over drinking (including from the bottle shops) and violence and damage to property and noise. There is real lack of toilet facilities in Freshwater and it is a major problem. When you add a Motel designed to accommodate Patrons things can only get much worse.

Stormwater:

Neither of the two options are Valid - both involved digging up large areas of Road and will result in an Unsatisfactory outcome for the Basin Stormwater system.

Finally:

The appearance of the proposed motel does not in any way complement the Heritage nature of the Pub and the size and bulk of the Motel will be a blight on the streetscape of Undercliff Road and Charles St and Moore Road, One of the other aims of the WAP2011 is to "ensure that development does not have an adverse effect on streetscapes and vistas" and this proposal from HH does not satisfy this particularly the view from Undercliff and the lack of setback to match the other properties beside this proposal in Undercliff Road.

The Fact That this Motel is attached to a Hotel is a major concern as opposed to a separate Motel application designed to accommodate Families on Holidays. In addition the use of THE Hotel is designed to attract Younger patrons and all the issues that

accompany a Live Music Venue/Function Centre. I note that PILU a Restaurant In Undercliff RD Freshwater in a recent DA2024/0946 is restricted to 20 Single Function Bookings a Year for Neighbour Amenity due to the difficulty controlling patron Noise with Functions. Harbord Hotel is a Large Function Centre seeking to add Accommodation and perhaps extent Functions into the area around the pool. We note that the plans in the HH application are NOT Binding.

We are custodians of this land for future generations to enjoy and we should work to protect it from Developers whose only interest is to maximise return on their investment at any expense. It is also my opinion that it will negatively impact the local business as most people to the HH are at night and the Business open at night are largely competitors to HH and HH will seek to retain ever food and drink dollar while during the day customers of other shops won't be able to park so they will go elsewhere. Basically resident/visitors/businesses all seek to lose from this proposal which will change the Village culture of Freshwater.

Thankyou
Freshwater Long term Residents

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

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Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

OBJECTION -

I would like to make a submission against the changing of the LEP Plan 2011. It would be an absolute travesty for Freshwater to become a high rise concrete jungle due to over development. Surely we can keep some areas free of wind tunnels, shading and a general sense of doom from a beautiful part of our coast.

I believe the hotel over the years has had 100's of submissions against it, and still they build whatever they want.

If the LEP is allowed to change, even if these developers build something that is half decent, DOES NOT mean the next owners will have the same mentality.

Please do not allow this application to go through,

Kind Regards

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First Name

Family name



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Email

[REDACTED]

Suburb/ Town

Freshwater NSW 2096

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I agree to the Privacy statement

submission

I would like to point out that the council voted against this proposal and a large number of residents in Freshwater, especially those who live in Undercliff Rd and Moore Rd who will be mainly effected by this Motel are against this proposal.
Freshwater is a low density residential area and should stay that way.

Please consider the residents for Freshwater who will be effected by this proposal when you make you decision.

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Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

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Suburb/ Town

Freshwater

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submission

As a resident of Freshwater I am totally against this development .It beggars belief that it will even be considered. Traffic is already at saturation point. I could go on and on about this but one very major point is the fact that the sewer runs straight through the property of the pub and the storm water. If re-directed down Undercliff Road it will cause major disruption and the cost would be astronomical. Indirectly it would affect the rate payers. The rates are already beyond belief. There is a lot of infrastructure under the ground on both sides of Undercliff Road. A development of this magnitude will take at least three to four years. It doesn't bear thinking of. Do not pass this hideous development!!

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[REDACTED]

Family name

[REDACTED]

☐

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Suburb/ Town

Freshwater

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No

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submission

My submission relates to the planning proposal to amend the Warringah Local Environment Plan 2100 to increase the size of the existing Harbord Hotel and allow hotel accommodation on the site.

As a long -term resident of Moore Road,Freshwater, living within close proximity of the Hotel, I'm against such a proposal.

Freshwater is a very popular location for families and visitors. Finding parking can be extremely difficult. This proposal to build hotel accommodation would put pressure on parking and the flow of traffic.

I don't believe that the pub and its outreach to the Freshwater community would be improved by increasing its size and providing accommodation. Unfortunately, this newly-owned pub is not popular with the locals. It has become a venue for mainly young people and as such it does not offer the friendly, family vibe it was once famous for.

It is not a good idea to re-zone this area from R2 Low Density Residential. This classification is working well. There is plenty of development going on in Freshwater under this zoning rule and the area is a beautiful beachside suburb that attracts people from everywhere. There is no need to now increase the size and purpose of the heritage- listed pub which should serve the area with intention. It simply isn't doing this at present, so why should it be granted permission to increase it's footprint in an area that doesn't need it or want it?

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

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Suburb/ Town

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[REDACTED]

Family name

[REDACTED]



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Email

[REDACTED]

Suburb/ Town

Sydney

I have made a reportable political donation

No



I agree to the Privacy statement

submission**TO WHOM IT MAY CONCERN**

I wish to strongly object to the planning proposal (PP-2024-1593) for 29-31 Moore Road and 64 Undercliff Road, Freshwater including proposal to rezone property on Undercliff Road, Freshwater. I am a resident of Freshwater and have been for the last 26 years.

My reasons for objecting are as follows:

1) I believe the proposal is not in keeping with the current properties and residences in the Freshwater area all of which have been

required to meet the guidelines for R2 or light residential. This is a large-scale development and will ruin the quiet ambience and village atmosphere for which Freshwater is renowned for.

2) If approval to rezone 64 Undercliff Road is given as indicated in this proposal it would create a very significant precedent and lead to similar proposals from other developers, further adding to the state's housing crisis.

3) Development of 64 Undercliff Road would involve removing a residential building and further exacerbate the state's housing crisis, resulting in further scarcity of permanent residential accommodation, which I believe is against NSW government policy to meet the demand for permanent accommodation. This is contrary to Minns Labor Government undertaking to help address the state's housing crisis and provide Low and Mid-Rise Housing together with the necessary infrastructure and services communities need.

4) Parking is very scarce in the Freshwater Beach area and results in traffic jams as visitors to the area try to secure a parking spot, particularly in Undercliff Road.

5) There is already a lack of adequate infrastructure in the surrounding area eg adequate parking, adequate footpaths, cycling lanes which all pose a danger to pedestrians, and other road users.

6) The hypothetical drawings of a potential hotel included as part of this rezoning application would bear no relationship to what might subsequently be proposed in future Development Applications.

7) The footprint of the site would encompass the whole site leaving no space for greenery or trees.

8) The current Harbord Hotel development does not adequately deal with the revelry that residents have to endure until all hours of the night in the surrounding streets. The hotel is frequented by a younger out of area demographic, and these patrons do not leave the area at hotel closing times. The residents must deal with damage to their gardens as well as cleaning up broken bottles. In addition residents of our unit block have sighted these people urinating in our garden. All this has ruined the quiet ambience of a family friendly, community oriented, residential area. This would be exacerbated should the proposed rezoning be approved.

I trust you take my views and the views of the majority of the community into consideration and do not approve this proposed planning proposal and rezoning.

Submission Type

I am making a personal submission

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

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Email

[REDACTED]

Suburb/ Town

FRESHWATER

I have made a reportable political donation

No

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submission

I am a resident of Undercliff Road Freshwater, within a two minute walk of the Harbord Hotel.

I strongly oppose this proposal. I note that the documents and reports submitted by the applicant don't even spell the name of my street correctly.

The proposal is not in keeping with current properties and residences in Undercliff Rd, Charles St or Moore Rd, all of which have been required to meet the guidelines for R2 or light residential. The proposal is a large-scale commercial development, the likes of which, to my knowledge, have not been proposed in Freshwater previously.

If planning were to rezone 64 Undercliff Rd as requested it would create a very significant precedent and would lead in my opinion to other such proposals with developers arguing that a precedent had already been set. This has the potential to totally change the character and residential quality of this part of Freshwater, particularly Undercliff Road, Charles Street and Moore Road. There is potential for developers to buy up a number of adjoining properties and then submit applications for rezoning for commercial purposes.

Demolition of the current building on 64 Undercliff Road would remove three rental properties (moderately priced compared to other properties in Freshwater!) contributing further to the existing shortage of residential properties available to rent.

Hypothetical drawings of the proposed 37 room hotel are totally inconsistent with the character and local heritage significance of the current Harbord Hotel building. There appears to be no space for gardens, trees or any vegetation to soften the impact of the proposed bulky building. The amenity of surrounding properties in Undercliff Rd and Charles St would be severely affected as the new hotel building is planned to be three storeys high.

There are significant infrastructure and basic public facilities lacking in the surrounding area. For example there is a lack of footpaths and those that do exist are most inadequate and dangerous for parents using prams or pedestrians using mobility aids. In the case of Undercliff Road this often forces pedestrians and underage cyclists to use the roadway, putting their safety at risk.

There are insufficient pedestrian crossings (actually there are none!) especially in the context of the increased volumes of traffic over the past few years. During summertime I regularly see parents pulling trolleys filled with beach equipment and often their children on the roadways because footpaths are either non-existent or too narrow to accommodate such trolleys.

Public authorities should be focusing on providing these facilities as befits a residential area rather than opening the floodgates to commercial development.

Parking in Undercliff Rd, Moore Rd and Charles St, especially during summer is a major problem now and this has been getting worse since the current owners of the Harbord Hotel took over and commenced their expansion plans. The Traffic and Transport report paid for by the applicants is a gross understatement of the issue. A claim that the current 167 bus is a significant transport provision is simply laughable. Further the 165X which is also claimed to be a benefit only operates for a short time during weekday morning and evening peaks and is nonexistent on weekends.

Speed limits in the surrounding are way too high given the volume of foot traffic and the lack of safe places to cross. A large commercial development would make the situation far worse and make our residential streets less safe to use.

Since the current owners took over Harbord Hotel and undertook refurbishment and expansion there has been a significant increase in noise, littering and unruly behaviour by hotel patrons as they leave the hotel premises. This is a problem from Friday evening and through the weekends and has had a negative impact on the amenity of properties in the surrounding area. Further expansion of the hotel is likely to further exacerbate this.

This application is overwhelmingly opposed by the residents of Freshwater. Residents strongly lobbied and voiced their concerns to our local Council members and this resulted in Northern Beaches Council opposing the application. I strongly urge the North Sydney planning panel to also reject it.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

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Email

[REDACTED]

Suburb/ Town

Freshwater

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submission

Dear Planning Panel,

I am a nearby resident of Undercliff rd, writing to express my strong objection to the proposed hotel development on our quiet residential street.

1. Existing Impacts from the Pub

Having lived here for 7years, I understand firsthand the late-night noise, foot traffic, and many episodes of antisocial behaviour the

existing pub generates. Introducing a hotel will only amplify these issues.

2. Inappropriate Patronage

A pub-hotel combination with such small rooms will draw a younger, party-oriented clientele, not the family visitors the owners speak about. Which family would honestly want to stay in this hotel attached to a noisy pub with largely a very young clientele that drink too much??

3. Rooftop Pool—Unacceptable Noise Nuisance

The proposed rooftop pool is particularly concerning. Even moderate socialising or screeching voices at night would carry across the basin due to its elevated position—a nuisance that is wholly inconsistent with the peaceful character of our neighbourhood.

4. Loss of Residential Housing

The demolition of a small flat building will reduce rental housing supply in an area already facing acute shortages—this is at odds with the objectives outlined in the Northern Beaches Local Environmental Plan (LEP), which seeks to provide for housing needs while maintaining harmony with existing residential environments.

5. Height, Bulk, Design, and Traffic Concerns

The building's proposed height, mass, and design appear to be out of scale with the prevailing low-rise character defined in the Development Control Plan (DCP) and Local Strategic Planning Statement "Towards 2040". Moreover, the concept parking and traffic arrangements are insufficient for the site, risking congestion and compromising safety in what is currently a calm, pedestrian-oriented street.

Trying to rezone Undercliff rd into a commercial road is absolutely outrageous and shouldn't even be considered for one second. I urge the panel to come and spend some time in our road on a busy summers day when people from all over Sydney come to enjoy the beach. Adding any more traffic will be truly unacceptable for our street.

Given these cumulative concerns—noise, loss of housing, scale, design incompatibility, and traffic—I urge the Panel to refuse this proposal wholeheartedly. Approving it would erode the liveability, character, and amenity that make Freshwater special.

Thank you for considering this submission

And we truly hope you can decide in favour of the residents of Freshwater and not the owners of the hotel who are only willing to consider their own back pockets even after all the opposition they are facing.

Kind regards,

[REDACTED]

Submission Type

I am making a personal submission

Title

Mrs

First Name

██████

Family name

██████

☐

Name withheld

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Email

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Suburb/ Town

Freshwater

I have made a reportable political donation

No

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I agree to the Privacy statement

submission

Objection to Planning Proposal – Harbord Hotel Redevelopment

29–31 Moore Rd & 64 Undercliff Rd, Freshwater

We wish to lodge an objection to PP-2024-1593 on the following grounds:

- Inconsistency with Northern Beaches LSPS

The Local Strategic Planning Statement (LSPS) directs tourism growth to centres such as Brookvale and Dee Why, which have established public transport links and infrastructure. Freshwater, lacking these transport connections and infrastructure capacity, is not identified for short-term accommodation growth. This proposal conflicts with the LSPS's clear strategic priorities.

- Rezoning of 64 Undercliff Road

Rezoning 64 Undercliff Road from residential to permit 'pubs' and 'hotel accommodation' sets an undesirable precedent for the acquisition and redevelopment of neighbouring residential properties. This could lead to a gradual loss of the low-density character of Undercliff Road and surrounding areas.

If approval is considered, I request the Panel consider retaining this lot as a buffer, reducing the building scale along Undercliff Road. For example, excavating below ground for parking and dedicating the above-ground area to open space would better protect neighbouring residences.

- Bulk and Scale on Undercliff Road

The proposed building mass along Undercliff Road is incompatible with the existing streetscape of predominantly free-standing houses. Even within the 8.5m height limit, a continuous 53-meter-long building would dominate the street and disrupt the coastal village character. Limiting development to the existing pub site or reducing the building height on 64 Undercliff Road to one story would help mitigate these impacts.

- Noise and Amenity Impacts

While hotel accommodation itself may not significantly increase noise, the proposed elevated pool and outdoor areas are likely to generate noise late into the evening, impacting the amenity of neighbouring residents. This impact is difficult to mitigate and should be carefully considered.

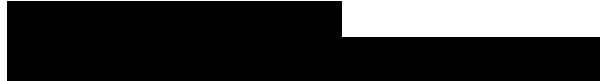
- Traffic Impact

Although traffic studies suggest the hotel's impact may be limited, increased parking demand for both the hotel and pub, along with deliveries, will place additional pressure on the site's constrained access and parking configuration. Council Traffic Engineers have also identified delivery vehicle height restrictions as a challenge that requires resolution.

Conclusion:

For these reasons, I respectfully request that the Planning Panel refuse the proposal or, at minimum, reconsider the inclusion and scale of 64 Undercliff Road in the development to ensure alignment with strategic planning principles, protect residential amenity, and preserve the character of Undercliff Road.

Kind Regards



Objection to Planning Proposal – Harbord Hotel Redevelopment

29–31 Moore Rd & 64 Undercliff Rd, Freshwater

We wish to lodge an objection to PP-2024-1593 on the following grounds:

- **Inconsistency with Northern Beaches LSPS**

The Local Strategic Planning Statement (LSPS) directs tourism growth to centres such as Brookvale and Dee Why, which have established public transport links and infrastructure.

Freshwater, lacking these transport connections and infrastructure capacity, is not identified for short-term accommodation growth. This proposal conflicts with the LSPS's clear strategic priorities.

- **Rezoning of 64 Undercliff Road**

Rezoning 64 Undercliff Road from residential to permit 'pubs' and 'hotel accommodation' sets an undesirable precedent for the acquisition and redevelopment of neighbouring residential properties. This could lead to a gradual loss of the low-density character of Undercliff Road and surrounding areas.

If approval is considered, I request the Panel consider retaining this lot as a buffer, reducing the building scale along Undercliff Road. For example, excavating below ground for parking and dedicating the above-ground area to open space would better protect neighbouring residences.

- **Bulk and Scale on Undercliff Road**

The proposed building mass along Undercliff Road is incompatible with the existing streetscape of predominantly free-standing houses. Even within the 8.5m height limit, a continuous 53-meter-long building would dominate the street and disrupt the coastal village character. Limiting development to the existing pub site or reducing the building height on 64 Undercliff Road to one story would help mitigate these impacts.

- **Noise and Amenity Impacts**

While hotel accommodation itself may not significantly increase noise, the proposed elevated pool and outdoor areas are likely to generate noise late into the evening, impacting the amenity of neighbouring residents. This impact is difficult to mitigate and should be carefully considered.

- **Traffic Impact**

Although traffic studies suggest the hotel's impact may be limited, increased parking demand for both the hotel and pub, along with deliveries, will place additional pressure on the site's constrained access and parking configuration. Council Traffic Engineers have also identified delivery vehicle height restrictions as a challenge that requires resolution.

Conclusion:

For these reasons, I respectfully request that the Planning Panel refuse the proposal or, at minimum, reconsider the inclusion and scale of 64 Undercliff Road in the development to ensure alignment with strategic planning principles, protect residential amenity, and preserve the character of Undercliff Road.

Kind Regards

[Redacted Signature]

[Redacted Address]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

refer to the attached file for our objection the the Proposal.

To: Sydney North Planning Panel (Panel)
To: Department of Planning, Housing and Infrastructure

From: [REDACTED]

NSW Government Planning Panels Ref: IRF25/1545

Our Ref: PP-2024-1593

Proposal: Planning Proposal (PP-2024-1593) – 29-31 Moore Rd and 64 Undercliff Rd, Freshwater – Harbord Hotel

Date: 11 August 2025

Note: submittor's name and address to remain confidential

Planning Proposal (Proposal)

The Proposal seeks to amend the Warringah Local Environment Plan 2011 to:

- Increase the size of an existing Additional Permitted Use (APU) for pubs; and
- Allow hotel accommodation on the site as part of the amended AP

Our Stance

We strongly object to the Proposal

Reasons for Objection to the Proposal

Current Zoning R2

The Proposal for the hotel accommodation building will rely upon the existing provisions of WLEP 2011 and *Warringah Development Control Plan 2011 (WDCP 2011)* for buildings within the **R2 Low Density Residential zone, which remain applicable despite the land use proposed.**

In the WLEP2011 document within an R2 residential zone - a hotel is prohibited as it's not listed under 'Permitted with consent'. It clearly states- Prohibited 'Any development not specified in item 2 or 3'. Hotel is not in item 2 and 3.

If the R2 is to remain then these would need to be adhered to otherwise they would need to apply for an E1 Local Centre Zone. The documentation doesn't support this as follows.

Zone R2 Low Density Residential

- To provide for the housing needs of the community within a low density residential environment - A hotel does not support this intent.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents - In fact as a resident our view is that a hotel is contrary to our day to day need for peace and quiet and safety. This is very inappropriate.

- To ensure that low density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah - A three level hotel block is definitely not in harmony with the natural environment.
- The total building footprint(s) must not cover more than 33.3% of the site area. The 33% would need to be met under R2 zoning rules. Submitted documentation does not provide any insights to compliance with this requirement.

Visual Impact

The Proposal claims that it demonstrates a high-quality development that integrates with and complements the existing development at the site. If the Planning Proposal does not seek to alter the built form controls applicable to the site, and as such, the future building will be assessed against the controls that currently apply to the **R2 Low Density Residential site** to ensure consistency with the desired character of the locality then why, in this proposal have they ignored some basic restrictions?

The Proposal only demonstrates how it's impossible to build a hotel within R2 zone restrictions.

- The artist's impression supplied shows one modernist monolithic structure spanning the width of 4 residential blocks on Undercliff Road. Under R2 restrictions only dual occupancy, including duplexes, semi-detached, and terraced houses are permitted. It doesn't appear to have attempted to reflect the style of such buildings.
- The plan has ignored the rear setback of 6m. The plan is only 3.5. This proposal is not aligned with the following exception.

- Exceptions

- Land Zoned R2 or R3

On corner allotments or sites with a double street frontage, where the minimum front building setback is 6.5 metres to both frontages, the front building setback may be reduced to a minimum of 3.5 metres for the secondary frontage, but secondary street variations must consider the character of the secondary street and the predominant setbacks existing to that street. Since this development would be on Undercliff Road, directly across the road from our property, granting of this exception would represent inconsistent and unfair application of planning rules.

- There are common areas with full height glass that will be illuminated at night shining into residents houses across the road. This on both Charles and Undercliff Road. This is not in keeping with an R2 zone as residential houses don't have common areas that need to be lit.

- 33.3% - the total building footprint(s) must not cover more than 33.3% of the site area. No documentation has been provided as to how this is possible when building a hotel.

- Side Boundary Setbacks – There are no opportunities for deep soil landscape areas.

- This proposal is visually dominant – it's immensely dominant compared to the residential houses. No attempt has been made to design the hotel to blend in with the style of Undercliff Road or Charles Street. It's not the desired character of the locality as a residential street.

- The scale and bulk of the building isn't in keeping with our lovely beachy residential street.

- There's not adequate separation between buildings especially on the eastern side to ensure a reasonable level of privacy, amenity and solar access is maintained. On the southern side along Undercliff Road privacy is concern.
- There is no visual continuity and pattern of buildings and landscape elements as this does not fit into the streetscape.
- There is no reasonable view sharing from Undercliff Road as the hotel would totally block the heritage building..
- The swimming pool and small courtyard is the only private open space and the proposal has minimal Landscaped Open Space. The swimming pool is far from private as the infinity edge seems to face the residents of Moore Road. No residential plan would allow this lack of privacy from both sides.
- To ensure new development is a good neighbour.

It is clear it is not possible to build a hotel within the R2 building Restrictions

Privacy

49A Undercliff has main living areas and the master bedroom on the northern side of our house facing the pub. With the addition of a hotel that's now 16 hotel rooms facing us and us at them.

The concept architectural plans provided definitely don't comply with the Planning Proposal to not alter the built form controls applicable to the site, if the building will be assessed against the controls that currently apply to the **R2 Low Density Residential site** to ensure consistency with the desired character of the locality, the only thing they've adhered to is the 8.5m height restriction.

Heritage Impact

The Planning Proposal is supported by a Heritage Impact Statement by Weir Phillips which confirms that the Hotel previously provided accommodation on the site and as such, the proposal is in keeping with the original and historical use of the site. If this is the case, in keeping with the heritage of the building the accommodation should be maintained within the existing heritage building.

The heritage report claims that the 'proposed change of use to permit hotel accommodation is **consistent with the character of the area** and responds to the changing nature of hotel accommodation demonstrating a preference for purpose built hotel/motel accommodation rather than staying above an operating hotel.' - Hotel accommodation isn't at all consistent with the character of Freshwater, as there are no other hotels.

View Corridors

Views to the heritage hotel building are currently uninhibited. The Heritage impact statement comments that the views from the rear aren't as significant as the front. While this is accurate, the secondary views **are significant to the residents of Undercliff Road**. There will be no view corridor at all under this proposal. View sharing is standard practice when submitting a DA. This is another example of how a hotel can't be built under R2 restrictions.

Significant intensification

The Proposal would further degrade the residential amenity. The Panel should not approve a proposal that degrades residential amenity. The WLEP Aims for residential amenity not to be degraded, as would be the case from the Hotel's

intensification of activities.

Additional Permitted Use (APU)

APU provisions maintain the current R2 Low Density Residential zoning and applicable built form controls, to permitting one additional type of development clearly isn't appropriate in light of the existing use of the land and the context of the site as a pub.

Precedence

If the Panel were to allow and amended use of the R2 zone, then the residents directly across the road on Undercliff Road could collectively sell and build a hotel with ocean views. As we're on steep blocks, under R2 restrictions we could build 5 levels stepping back. Under this precedence we could also ignore the 33% building footprint.

Conclusions

We are concerned by the substance of the Proposal and disregard for the integrity of the surrounding community's residential amenity and well-being.

The proposed change of use to permit hotel accommodation isn't consistent with the character of the area and doesn't respond to the changing nature of hotel accommodation as this area is zoned residential R2. If the Panel feels there's a need for purpose built hotel/motel accommodation then this should be looked at in an appropriate zone.

Insignificant documentation and drawings to support confidence they can build a hotel within the constraints of an R2 residential zone.

The proposed change of zoning to incorporate hotel accommodation is consistent with the historic and ongoing use of the site.

The proposed planning amendments to rezone the site, to allow for hotel accommodation not consistent with the character of Freshwater as a beach side suburb in an R2 or R3 zone.

Regards,

[REDACTED]

I am making a personal submission

Dr

██████████

☒

Please tick this box if you do not want your name published in the list of submitters on the department's website

Freshwater

No

☒

☒ I agree to the Privacy statement

1.I wish to object to the planning proposal Harbord Hotel 29-31 Moore rd and 64 Undercliff rd,Freshwater,NSW,2096 (PP-2024-1593) seeking to amend the Warringah LEP 2011 increase the size of an existing Additional Permitted Use for pubs (APU) and allow hotel accomodation on the site as part of the amended APU.

https://apps.planningportal.nsw.gov.au/prweb/PRAuth/app/EPImpl/ak-CJEhg9SSUeQnU96VuQgFfiVGY9Kr-*!/STANDARD

2.Reasons why I object:

Under previous ownership the hotel was managed to peacefully coexist the surrounding neighbours being mindful to minimise the behaviour of departing patrons and any unruly behaviour was quickly dealt with .

Under the current ownership there has been a marked change in the patron demographic to 18-35year olds ,resulting in unruly behaviour on departure which has disturbed the peace and quiet of the neighbours with loud shouting whilst waiting for their buses,ubers and pickup vehicles to arrive .In the outside courtyards loud shouting voices from partying patrons can intrude into our homes from around 8pm especially on weekends until closure at midnight.Raising the glass screens has had little improvement. Previous approvals never properly assessed the late night noise.

Combining a pub and hotel accomodation will likely attract more younger patrons and partying people rather than a stand alone hotel which would more likely attract families or relatives of locals where noise and amenity issues would be less likely.

There will be excessive impact beyond that suitable for a residential zone ,conflicting with the Warringah LEP if the 37 motel units plus a swimming pool are allowed,not to mention the increased road traffic in Moore rd and Undercliff Rd from 2 levels of parking.Charles st outside the hotel is already busy every day.

3.Loss of Residential Housing:

A small low story building containing several units is to be replaced by a multistory building covering most of the site for short term accommodation at a time when Sydney has a shortage of housing.

4:Concerns with Design concept:

The proposed height and bulk of the motel units show a large boxy building detracting from the heritage listed main hotel building and which will reduce the views of Undercliff neighbours and reduce their privacy.

The attraction of Freshwater and the reason why so many people enjoy living here is because it has been a quiet friendly mainly residential area with a family friendly beach.

The proposal claims that the Freshwater village will benefit economically from having motel units attached but the likely outcome is that the guests will mainly use the hotel restaurant and bars with little benefit to the rest of Freshwater.

There is hotel accommodation in nearby Manly and this area has many short stay units .

What survey has been shown in this proposal that there is great need for more motel units to turn a mainly residential L2 area into a party central zone.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

11/08/2025

Department of Planning, Housing and Infrastructure

planningproposalauthority@dphi.nsw.gov.au

To Whom it May Concern,

Planning Proposal (PP-2024-1593) - Harbord Hotel, 29-31 Moore Rd and 64 Undercliff Rd, Freshwater

I would like to make a submission in respect to PP-2024-1593, proposed works to Harbord Hotel (29-31 Moore Rd and 64 Undercliff Rd, Freshwater).

As a resident of Undercliff Road in Freshwater, I would like to express my strong objection to the current proposal based on the following concerns;

The rezoning of the block of units at 64 Undercliff Road from residential to commercial activity is of greatest concern due to;

Removes existing affordable housing during a housing crisis

Changing it from R2 Low Density will erode the existing low-density character of the street and the area

It is separately owned by Freshwater Boutique Pty Ltd (a personal real estate investment of Glenn Piper) and is not subject to a lease by Harbord Hotel Operations Pty Ltd

The inclusion of this site presents insurmountable infrastructure issues which will impact on the local council, residents and beach community.

The infrastructure issues include

the stormwater, board sewer and drainage easement all run through the site effectively cutting off 64 Undercliff Road from the rest of the site

The design of the build excavates below these drains and therefore would require moving them. This is not viable due to;

The regulations not allowing concreting over board sewer

Cannot relocate this sewer (there is no support from Sydney Water to this and it would have significant implications on another

property or site.

Cannot move the stormwater down the street as it is expensive, disruptive to the community

All 3 of these have environmental, social and economic ramifications for the local community.

There is no evidence by the applicant that any of these changes are viable and under the NSW Coastal Design Guidelines 2023 all relevant Local Planning Directions must be considered upfront.

By removing 64 Undercliff Road from this proposal, the redevelopment is more in line with the intention of the proposal to develop hotel accommodation in association with the existing Harbord Hotel site.

The other concerns we have are;

Rezoning of 64 Undercliff Road (as above)

Inconsistency with the Northern Beaches LSPS – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.

Bulk and Scale – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.

Noise and Amenity – The current noise from the Hotel is well managed, except for the back smoking bar, which I would like to flag as a concern currently, as it is outside and at the back of the property. The noise and inappropriate language from this space is noticable and has been recorded multiple times due to concerns. An elevated pool area is likely to generate even greater late-night noise than this, significantly impacting neighbouring properties.

Light Amenity - The stairwell at the back of the proposed hotel accomodation would be likely to be lit all night long. This would impact our light amenity and comfort. We request that this have external screens on the undercliff road side to protect residents from this light.

Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers. The current traffic and parking issues would be increased significantly from this development.

For these reasons, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

11/08/2025

Department of Planning, Housing and Infrastructure
planningproposalauthority@dphi.nsw.gov.au

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1. The rezoning of the block of units at 64 Undercliff Road from residential to commercial activity is of greatest concern due to;
 - Removes existing affordable housing during a housing crisis
 - Changing it from R2 Low Density will erode the existing low-density character of the street and the area
 - It is separately owned by Freshwater Boutique Pty Ltd (a personal real estate investment of Glenn Piper) and is not subject to a lease by Harbord Hotel Operations Pty Ltd
 - The inclusion of this site presents insurmountable infrastructure issues which will impact on the local council, residents and beach community.

The infrastructure issues include

- the stormwater, board sewer and drainage easement all run through the site effectively cutting off 64 Undercliff Road from the rest of the site
- The design of the build excavates below these drains and therefore would require moving them. This is not viable due to;
 - The regulations not allowing concreting over board sewer
 - Cannot relocate this sewer (there is no support from Sydney Water to this and it would have significant implications on another property or site.

- Cannot move the stormwater down the street as it is expensive, disruptive to the community
- All 3 of these have environmental, social and economic ramifications for the local community.
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The other concerns we have are;

1. **Rezoning of 64 Undercliff Road** (as above)
2. **Inconsistency with the Northern Beaches LSPS** – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.
3. **Bulk and Scale** – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.
4. **Noise and Amenity** – The current noise from the Hotel is well managed, except for the back smoking bar, which I would like to flag as a concern currently, as it is outside and at the back of the property. The noise and inappropriate language from this space is noticable and has been recorded multiple times due to concerns. An elevated pool area is likely to generate even greater late-night noise than this, significantly impacting neighbouring properties.
5. **Light Amenity** - The stairwell at the back of the proposed hotel accomodation would be likely to be lit all night long. This would impact our light amenity and comfort. We request that this have external screens on the undercliff road side to protect residents from this light.
6. **Traffic and Parking** – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers. The current traffic and parking issues would be increased significantly from this development.

For these reasons, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Elanora Heights

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am writing to lodge an objection to Development Application PP-2024-1593 for the following reasons:

Rezoning of 64 Undercliff Road – Allowing pubs and hotel accommodation sets a precedent for further redevelopment of residential properties, threatening the low-density character of the area.

Inconsistency with the Northern Beaches LSPS – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.

Bulk and Scale – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.

Noise and Amenity – The elevated pool area is likely to generate late-night noise, impacting neighbouring properties.

Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers. For these reasons, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Thank you



Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

FRESHWATER

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Dear Ms. McMahon / Sydney North Planning Panel,

We are Tuan and Tina of 37 Undercliff Road Freshwater.

We have lived here in Harbord for over 25 years.

We would like to object to the development proposal of the Harbord Hotel, on the grounds of:

1. the development uses capital and lobbying to bypass the R2 Low Residential Ruling to convert to a high-density commercial expansion - hotel accommodation in a quiet low density location.
2. the current land space certainly is not meant for the extent of development, particularly with regard to reasonable capacity, safe transport and governance.
3. the proprietors are currently not even controlling noise, drunkenness from its clients - even now beer bottles and cans are dropped along the street. Entrance lights are flashing 24/7 overnight to entice punters into the poker machine area.
4. the surrounding streets are already full of unsafe and illegal parking (parking at corner on unbroken yellow line, parking in wrong street direction, parking across driveways blocking pedestrian access) - this development would make it even more dangerous for pedestrians and flow traffic.
5. the proprietors have not consulted the local community in any detail- they have appointed their legal teams to squash any objection or appeal without any compromise or listening.

As responsible assessors, please mediate between what is right and safe versus the pure commercial force of the development - one where the community ultimately pays for any social and infrastructure costs while the proprietors maximise their return on equity.

Thank you.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

ALLAMBIE HEIGHTS

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No

☒

I agree to the Privacy statement

submission

I am lodging an objection to Development Application PP-2024-1593 as per my notes:

1.Inconsistency with the Northern Beaches LSPS – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure in the area.

2.Bulk and Scale – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would

significantly alter the visual amenity.

3.Noise and Amenity – The elevated pool area is likely to generate late-night noise, impacting neighbouring properties along with the expected additional foot traffic.

4.Rezoning of 64 Undercliff Road – Allowing pubs and hotel accommodation sets a precedent for further redevelopment of residential properties, threatening the low-density character of the area which would be detrimental to the whole area.

5.Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers. This along with the already limited street parking will create issues for us locals.

6.Increase in late night unruly behaviour due to excessive alcohol. Owning a property in Kooloora Ave this is already a issue and would only be increased with this proposal.

With these reasons in mind, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Kind regards,

[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

2099

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

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Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

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submission

Inconsistency with Northern Beaches LSPS

The LSPS identifies the need to diversify tourism “beyond Manly, Palm Beach and the beaches” and identifies centres such as Brookvale and Dee Why, with established public transport links and infrastructure as the preferred locations for additional short-term accommodation. Freshwater is not identified for this purpose, with its lack of transport and other infrastructure.

Rezoning of 64 Undercliff Road

The rezoning of 64 Undercliff Rd from residential to permit 'pubs' and 'hotel accommodation' sets a precedent for further acquisition and redevelopment of neighbouring residential properties, this could see the development increasing in size to the whole block which would further erode the existing low-density character of the street and the area.

If the development was to be approved – could the panel consider keeping this block as a buffer and reduce the scale of the building on Undercliff Road between neighbouring properties? Below ground the car park could be excavated for the required number of spaces and above ground could be open space.

Bulk and Scale on Undercliff Road

The proposed building along Undercliff Road is out of scale with the surrounding streetscape, which is characterised by free-standing houses. Even within the height limit a solid building 53 meters long would significantly alter the visual character of the area. This could be reduced by limiting the building to the existing Pub site or by only having one story vs three on 64 Undercliff Road

Noise and Amenity Impacts

While hotel accommodation will not significantly increase noise levels, we believe that the proposed elevated pool will generate noise late into the evening, impacting the residential amenity of neighbouring properties.

Traffic Impact

While traffic studies have shown the impact of a hotel would be limited, the additional carparking for the Pub and the hotel and deliveries should be considered given the configuration of the new car park compared to existing limited parking.

Deliveries have also been identified as a challenge by the Council Traffic Engineers given height restrictions.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

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Rezoning of 64 Undercliff Road – Allowing pubs and hotel accommodation sets a precedent for further redevelopment of residential properties, threatening the low-density character of the area.

Inconsistency with the Northern Beaches LSPS – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.

Bulk and Scale – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.

Noise and Amenity – The elevated pool area is likely to generate late-night noise, impacting neighbouring properties.

Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers.

As stated in a previous objection the NSW Government requires further permanent dwellings and infrastructure for our increasing population. This development in NO WAY encompasses that goal. Short term hotel room accommodation is not needed in Freshwater.

There is abundance of hotels just over the hill at Manly.

For these reasons, I respectfully request that the panel totally reject this application.

[REDACTED]

Freshwater

Submission Type

I am submitting on behalf of my organisation

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

OBJECTION TO APPLICATION NUMBER PP-2024-1593

Submission to planningproposalauthority@dphi.nsw.gov.au

64 Undercliff Road Freshwater 2096 Lot 6 Sec 1 DP 7022 (currently block of flats)

29 Moore Road Freshwater 2096 (Harbord Hotel and carpark)

31 Moore Road Freshwater 2096 (Bottle Shop)

Application Number: PP-2024-1593

OBJECTION TO DEVELOPMENT APPLICATION PP-2024-1593

Officer: Louise McMahon Director Planning Proposal Authority

On behalf of the owners of [REDACTED], we strongly object to the Applicant's planning proposal seeking to amend Schedule 1 (Additional permitted uses) under the Warringah 2011 LEP, to facilitate the development of hotel accommodation integrated with the existing Harbord Hotel and bottle shop.

This proposal also seeks to amend the current zoning at 64 Undercliff Road Freshwater from Low Density Residential to include hotel accommodation.

The concept plans show that the proposal is to develop a 37-room boutique hotel added to the back of the above properties, along with a swimming pool and a 72-car space basement car park.

OBJECTIONS

On behalf of the owners of [REDACTED], we strongly object to the Applicant's proposal
Application Number: PP-2024-1593

Our building is almost immediately opposite the Harbord Hotel on Moore Road and comprises 48 apartments with approximately 100 residents who increasingly include couples with small children.

Compared to Sydney's famous tourist beaches of Manly and Bondi, which are surrounded by commercial development, Freshwater is a tiny beach, surrounded by residential properties and has limited capacity for additional beachgoers and the associated traffic.

Considering the major rental crisis in N.S.W. this development is actually diminishing residential accommodation in this area.

NOISE & AMENITY

The hotel is in a residential neighbourhood where people live and commute to work. The beach is very popular with families, particularly on weekends. The residents tolerate the influx of visitors on the weekends – but with holiday makers partying every day of the week, this changes the whole ambience of an area. Unlike Manly, Freshwater it is not a party/holiday precinct.

A by-law to prevent short term rentals was implemented in our building because residents were fed up with holiday makers' behaviour disturbing their sleep during the week.

By allowing 64 Undercliff Road to rezone from Low Density Residential to Hotel Accommodation sets a precedent in the area for developers to buy up blocks of units and seek to rezone them. If Freshwater becomes a party/holiday precinct seven days a week, the number of permanent residents will decrease and be replaced by short term rentals, exacerbating the rental crisis.

Under the current ownership/management of the Harbord Hotel we have experienced an increase in noise from patrons queued up to get into the venue and from patrons leaving the hotel.

They have been observed congregating on our driveway, sitting and drinking on the curb, and leaving their rubbish and vomit behind in the gutters, verges and in our garden. Residents are already tolerating loud talking, bad language, taxis blowing horns, car doors slamming, rubbish and broken bottles in the street and men urinating in gardens. Guests on holidays will increase noise and the incidents of bad behaviour during the week as well.

TRAFFIC

Traffic in this area of Freshwater during summer is chaotic and parking impossible. Any increase in the number of guests and staff at the Hotel will impact the traffic and parking in the area.

Due to the steep hills and the number of drivers concentrating on finding a carpark, the corners of Moore Road and Gore Street, and Moore Road and Charles Street are high risk corners for traffic accidents.

The concept plans show that the hotel accommodation is on the land of the existing carpark. We note the concept plans allow for a 72 underground carpark off Charles Street. This carpark has 19-20 spaces leaving only additional 37 carparks for guests and 15 for staff and service vehicles for the accommodation.

CONCLUSION

In 1923 the name of the suburb of Freshwater was changed to Harbord because the good name of Freshwater had been sullied by the boisterous behaviour of some of the young men who rented the many camps scattered around the area, mainly at weekends during the warmer months.¹ In 2008 the suburb was renamed Freshwater, and we don't want history to be repeated.

On behalf of White Waves Strata Committee

[REDACTED]

[REDACTED]

¹How campers at Freshwater led to the suburb's name being changed to Harbord, July 14, 202, Manly Daily by John Morcombe <https://freshie.org.au/2021/02/09/how-campers-at-freshwater-led-to-the-suburbs-name-being-changed-to-harbord>

Submission Type

I am making a personal submission

Title

Mr

First Name

■

Family name

■

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

■

Suburb/ Town

2096

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No

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I agree to the Privacy statement

submission

Objection to Proposed Development – Harbord Hotel 31 Moore road and 64 Undercliff.

My name is Eli Brady and I am a long-term resident of Freshwater. The rest of the freshwater community and I strongly object to the proposed extension for the following reasons:

1. Unacceptable Noise Impact-

The Harbord Hotel already generates significant noise, especially during weekends and evenings. An extension of capacity will inevitably increase noise levels from patrons, music, and deliveries. This will severely disrupt residential amenity and breach the acoustic limits expected in a residential zone.

2. Increased Traffic and Parking Pressure-

The surrounding streets are already congested, with limited parking availability for residents. Even with the additional carpark that will be added people will still continue to use street and beach carpark for parking. Expanding the venue will draw more patrons, placing further strain on parking, increasing illegal parking on residential verges, and worsening traffic hazards for pedestrians and cyclists.

3. Overdevelopment & Incompatibility with Local Character-

The proposed scale and bulk are excessive and inconsistent with the existing character of Freshwater. The expansion will dominate the beachy streetscape for locals and diminish the coastal village feel that the Local Environmental Plan seeks to protect.

4. Late-Night Patron Dispersal Issues-

The proposal fails to address how increased patron numbers will be managed at closing time. Harbord hotel lacks a number of good security guards. Late-night noise destructive behaviour, and loitering are already problematic throughout the village; an expansion will exacerbate these impacts, particularly on nearby residents.

5. Environmental & Heritage Concerns

The Harbord Hotel once was a building of local heritage significance and has already been updated with a whole new venue and nightclub already existing upstairs. More alterations after this nightclub and new pub scale risk undermining the houses around, the areas value and the surrounding coastal environment.

6. Not in the Public Interest

While business growth can benefit the community, this proposal prioritises commercial gain over residents' quality of life. Approving such an expansion would set a concerning precedent for overdevelopment in Freshwater.

7. existing venues all around

The harbord diggers, the new Harbord Hotel pub and nightclub upstairs, the new plan for the freshwater surf club and the development of the freshwater park and playground just behind the beach is more than enough! The once upon a time quiet freshie village is dying with all these developments that are over growing the small freshwater community. Please enough is enough

Kind Regards, lifelong freshwater resident- [REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Please refer to pdf attachment for my submission.

13/08/2025

Department of Planning, Housing and Infrastructure
planningproposalauthority@dphi.nsw.gov.au

To Whom it May Concern,

Planning Proposal (PP-2024-1593) - Harbord Hotel, 29-31 Moore Rd and 64 Undercliff Rd, Freshwater

I would like to make a submission in respect to PP-2024-1593, proposed works to Harbord Hotel (29-31 Moore Rd and 64 Undercliff Rd, Freshwater).

As a resident of Undercliff Road in Freshwater, I would like to express my strong objection to the current proposal based on the following concerns;

1. The rezoning of the block of units at 64 Undercliff Road from residential to commercial activity is of greatest concern due to;
 - Removes existing affordable housing during a housing crisis
 - Changing it from R2 Low Density will erode the existing low-density character of the street and the area
 - It is separately owned by Freshwater Boutique Pty Ltd (a personal real estate investment of Glenn Piper) and is not subject to a lease by Harbord Hotel Operations Pty Ltd
 - The inclusion of this site presents insurmountable infrastructure issues which will impact on the local council, residents and beach community.

The infrastructure issues include

- The stormwater, board sewer and drainage easement all run through the site effectively cutting off 64 Undercliff Road from the rest of the site
- The design of the build excavates below these drains and therefore would require moving them. This is not viable due to;
 - The regulations not allowing concreting over board sewer
 - Cannot relocate this sewer (there is no support from Sydney Water to this and it would have significant implications on another property or site.
 - Cannot move the stormwater down the street as it is expensive, disruptive to the community
 - All 3 of these have environmental, social and economic ramifications for the local community.
 - There is no evidence by the applicant that any of these changes are viable and under the NSW Coastal Design Guidelines 2023 all relevant Local Planning

Directions must be considered upfront.

By removing 64 Undercliff Road from this proposal, the redevelopment is more in line with the intention of the proposal to develop hotel accommodation in association with the existing Harbord Hotel site.

The other concerns we have are;

1. **Rezoning of 64 Undercliff Road** (as above)
2. **Inconsistency with the Northern Beaches LSPS** – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.
3. **Bulk and Scale** – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.
4. **Noise and Amenity** – The current noise from the Hotel is well managed, except for the back smoking bar, which I would like to flag as a concern currently, as it is outside and at the back of the property. The noise and inappropriate language from this space is noticable and has been recorded multiple times due to concerns. An elevated pool area is likely to generate even greater late-night noise than this, significantly impacting neighbouring properties.
5. **Light Amenity** - The stairwell at the back of the proposed hotel accomodation would be likely to be lit all night long. This would impact our light amenity and comfort. We request that this have external screens on the undercliff road side to protect residents from this light pollution.
6. **Traffic and Parking** – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers. The current traffic and parking issues would be increased significantly from this development.

For these reasons, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I strongly object to the proposed development of Harbord Hotel. Specifically the change of zoning for no. 64 Undercliff Road Freshwater. There is an area already in Freshwater for commercial use. There is no reason to change the zoning of 64 Undercliff Road to commercial and lose the residential and therefore rental site. I have been a lifetime resident of Freshwater (when it was called Harbord) and can testify to the overcrowding of the beach, transport and roads over the last decade. I have witnessed the 167 bus leave passengers at Charles Street Freshwater due to the bus already being at capacity. The facilities at the beach are not up to coping with the influx of summer visitors already let alone adding a 39 room motel to this site. My parents fought to stop the

overdevelopment of Harbord in the 60's/70's - this application is not in keeping with the area and it's ability to cope with more traffic, pedestrians, bus passengers etc.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I am writing to lodge an objection to Development Application PP-2024-1593 for the following reasons:

Rezoning of 64 Undercliff Road – My major concern is that allowing 'pubs and hotel' accommodation sets a precedent for further redevelopment of residential properties, threatening the low-density character of the area.

Inconsistency with the Northern Beaches LSPS – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.

Bulk and Scale – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.

Noise and Amenity – The elevated pool area is likely to generate late-night noise, impacting neighbouring properties.

Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers.

For these reasons, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Kind regards,

[Redacted signature]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater NSW

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am strongly opposed to this development proposal and proposed land rezoning.

As a young person (32) who has lived in Freshwater for 10 years I'm troubled by this proposal and the potential future of Freshwater.

Freshwater is one of the true gems of Sydney. A beautiful, 'off the beating track' family suburb. This proposal risks all of that.

- The public don't want this hotel. Freshwater is not a suburb that can or should have short term accommodation
- The Hotel already has problems with drunk patrons, traffic problems and neighborhood disturbances
- The proposed car parking wont be adequate, it will make parking worse than it already is

- The hotel is a historic icon of Freshwater. It would be crazy to destroy that by building a hotel
- Greenspace and underdevelopment is quintessential to Freshwater's character. This proposal completely disregards this

In making a decision on this proposal please consider the local population and the future of Freshwater, not the greedy desires of the owners/developers of the hotel. We need to preserve the History of coastal Australian suburbs.

Thank you

Submission Type

I am submitting on behalf of my organisation

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am making this submission as Co-Chair of the Friends of Freshwater, Inc. Our submission is contained in the attached file.

Planning Proposal (29-31 Moore Rd & 64 Undercliff Rd, Freshwater)

PEX2024/0005 - Harbord Hotel

Submission from Friends of Freshwater
friends@freshie.org.au

Thank you for the opportunity to provide comments on this Planning Proposal.

As the Proposal allows only for the rezoning of this particular site, and does not approve the design and scope of the proposed development, **Friends of Freshwater is prepared to Support the Planning Proposal if the following conditions are noted or imposed:**

- The historic nature of this particular site is recognised and it is stipulated that this decision does not set a precedent for other R2 Residential areas in the Freshwater Basin to be rezoned for similar purposes;
- A condition is imposed on the developer to undertake community forums to better explain the proposal, address community concerns and potentially modify its proposal before a formal Development Application (DA) process commences; and
- A formal DA process to approve modifications to the site and construction of hotel accommodation is undertaken.

Statement of our understanding of this Planning Proposal

We note that the planning proposal seeks to amend the Warringah Local Environmental Plan 2011 to facilitate construction of a three-storey hotel comprising approximately 37 hotel rooms, reception/lobby, guest lounge, gym and swimming pool on the southern portion of the site together with basement carparking for 72 cars. This will be integrated and managed in association with the existing 'Harbord Hotel' and bottle shop.

The amendment to the LEP essentially seeks to:

- increase the size of an existing Additional Permitted Use (APU) for pubs which applies to 29-31 Moore Road by incorporating 64 Undercliff Rd into the site; and
- allow hotel accommodation on the larger site as part of the amended APU even though the site is within an area currently designated as R2 Residential

We see that this planning proposal is accompanied by preliminary architectural drawings and other documentation to demonstrate key aspects of the development and its impact on the local area. We also note that if the Planning Proposal and amended APU are accepted there will be a full and transparent development application process run by the Northern Beaches Council so that the community is

able to view and comment on final architectural drawings and plans governing the development.

As such we understand that approval under this Planning Proposal provides a framework under which the development can potentially proceed but does not provide approval for the final design or scale of the development.

Our comments on the Proposal

We note that Friends of Freshwater made a submission on the original Harbord Hotel Rezoning proposal in September 2024.

In that submission we noted that for many years, the Harbord Hotel had accommodation for up to 15 rooms at the upper level of the hotel, although in recent decades this was seldom made available. That accommodation was repurposed by the Hotel as part of the approved Stage 2 of the redevelopment and is no longer present. Nonetheless there is a precedent for hotel accommodation on the site.

We also note that at the current time there is no significant facility providing short-term accommodation in the Freshwater Basin (Basin). Anecdotally we believe that there is significant demand for such accommodation. We believe it would be a boon for local businesses which often struggle with seasonal visitation to the Basin. The potential economic benefit in terms of turnover for local businesses and jobs is further supported by Annexure 7 – Economic Impact Assessment.

We believe that many aspects of the development have been well thought through. Additional parking spaces, improved loading facilities, and height constraints maintained within the 8.5 metre requirement are all welcome and suggest the development has positive potential. However, these issues must be weighed against other factors and potential impacts on the community.

We note that there has been significant opposition to this proposal from the community in Freshwater. This has come from both those immediately impacted by the development, and others worried about the precedent that may be set by allowing the rezoning of this site within an R2 Residential zone in Freshwater.

It is our view that community engagement on the original DA proposal was lacking by both Council and the developer. Council only contacted a small group of local residents immediately impacted by the development, whereas this is a proposal that affects a much broader area. We acknowledge and commend the fact that Friends of Freshwater was contacted and invited to attend an exclusive information session by the developer. However, to our knowledge, no broader community engagement was undertaken. Not surprisingly the community lodged many objections to that proposal.

While this current round of consultation provides additional avenues for the community to express its views, we see little evidence of modification of current

plans to incorporate the feedback from the earlier round of public consultation. If the community is to have faith in these processes we would expect to see some genuine modification of plans to incorporate community views.

Therefore, while in principle we support the concept of this development, if a final DA were to be submitted in line with the current documentation there would be a number of issues of significant concern.

- a) The number of rooms proposed seems excessive and the concept plans show most of the land being used. It would be more in line with the community if there was some open space included and fewer rooms.
- b) The noise component from a roof-top swimming pool would impact neighbours as outdoor 'pool entertainment' would be bound to occur
- c) The absorption of 64 Undercliff will reduce affordable housing in the neighbourhood and is not part of the current Hotel footprint
- d) There will inevitably be additional road traffic from both guests and hotel services around an already crowded area in Freshwater. This needs to be specifically addressed
- e) While the Hotel is on bus transport routes these services are limited, particularly in the evening. Additional evening services may need to be considered
- f) There should be a taxi/Uber pick up and drop-off included in the plans
- g) We are concerned that there may not be adequate access provided for people with limited mobility or disability, particularly given the steep nature of the road along Charles Street. Disabled access into the hotel via lifts or ramps from both the street and car park needs to be included, as well as disabled access between floors in the dining, entertainment and accommodation areas.
- h) We also note that the current footpath along Undercliff Road on the south of the site is not paved and is in poor condition. A significant improvement in the footpath both adjacent to the site and along Undercliff Road as it progresses eastward towards the beach is required
- i) The recently completed Stage 2 development has added a live music venue and music recording studio to the Hotel. We have not yet seen any reports on the impact of noise, road traffic or foot-traffic from these developments. A final DA must address the impact of the full Stage 2 and Stage 3 developments on these issues
- j) We welcome that the current design appears to stay within the 8.5 metre height restriction. It is essential that the 8.5m limit is retained. Almost every house along Undercliff Road is set back from its frontage and thus the 8.5 limit starts further back on the downslope of the block, reducing the visual impact from street level. We trust a similar setback will apply here.
- k) Further to these height concerns, the bulky nature of the development seems to be inconsistent with and overpower the adjacent heritage building. Design modifications should be considered to lessen this stark contrast.

In relation to the last point, the current NSW government appears to be seeking to increase height limits in many locations. As such, rezoning this site has the potential to open a Pandora's box and lead to further development 'creep'. We therefore reiterate the importance of maintaining an 8.5 metre height limit and appropriate setback from the street for this development, regardless of any potential changes in Government policy or regulation.

For the reasons above, Friends of Freshwater remains concerned about the scope of this development and its impact on the local community. As such potential approval of this Planning Proposal must be recognised as only a first step in a process of broader community consultation, consideration of modifications and submission through a formal Development Application process. It must also be recognised that there are specific historic issues that apply to this site and that the approval of rezoning at this site is not a precedent for broader application in the Freshwater Basin.

Consequently, Friends of Freshwater is willing to support this Planning Proposal only if the conditions outlined at the front of this submission are noted and imposed to the fullest extent possible.

Submission Type

I am making a personal submission

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

MONA VALE

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am writing to lodge an objection to Development Application PP-2024-1593 for the following reasons:

Rezoning of 64 Undercliff Road – Allowing pubs and hotel accommodation sets a precedent for further redevelopment of residential properties, threatening the low-density character of the area.

Inconsistency with the Northern Beaches LSPS – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.

Bulk and Scale – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.

Noise and Amenity – The elevated pool area is likely to generate late-night noise, impacting neighbouring properties.

Traffic and Parking – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers. For these reasons, I respectfully request that the panel reject this application or require significant amendments to address these issues.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Manly Vale

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am writing to lodge an objection to Development Application PP-2024-1593 for the following reasons:

1. Rezoning and Precedent Risks

Allowing a zoning change at 64 Undercliff Road to accommodate a pub and hotel-style accommodation sets an unwelcome precedent that could encourage further commercial expansion into the surrounding residential area. This raises the risk of incremental redevelopment across the block, progressively eroding the established low-density character that defines the neighbourhood.

If Council moves forward with the proposal, it is strongly recommended that this site be maintained as a transition buffer and that the building's bulk along Undercliff Road be reduced. One option could be to meet parking requirements through basement-level parking,

allowing for landscaped or open space above rather than increased building mass.

2. Alignment with the Northern Beaches LSPS

The Northern Beaches Local Strategic Planning Statement prioritises diversification of tourism outside of Manly, Palm Beach, and the coastal strip, with an emphasis on directing growth to established centres like Brookvale and Dee Why. These hubs are already supported by robust public transport and infrastructure.

Freshwater is not identified for such tourism expansion and lacks the transport connectivity and supporting infrastructure to sustainably accommodate additional short-term visitor accommodation.

3. Bulk, Scale, and Visual Character

The proposed form along Undercliff Road is inconsistent with the surrounding pattern of detached dwellings and smaller-scale buildings. Even where the height limit is met, a 53-metre-long continuous façade would represent a significant departure from the current streetscape.

Visual impacts could be reduced by limiting any redevelopment to the existing pub footprint or by capping the Undercliff Road frontage at a single storey, rather than the proposed three levels.

4. Noise and Amenity Concerns

While guest rooms themselves are unlikely to generate notable external noise, the proposed elevated pool deck poses a risk of amplified noise—particularly in the evenings—which could undermine the residential amenity of adjoining properties.

5. Traffic, Parking, and Servicing

Although traffic modelling indicates limited additional congestion, the combination of hotel, pub, and new parking facilities raises operational concerns. The design of the car park and the number of spaces allocated may still create pressure on local streets. Delivery access remains a critical issue, as identified by Council's Traffic Engineers, given the tight access points and height restrictions for service vehicles.

Conclusion

The proposal, as presented, conflicts with key strategic planning priorities, threatens the established residential character of Freshwater, and introduces avoidable noise, amenity, and traffic challenges. We urge the panel to either refuse the application or require substantial amendments that address these issues.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Please see attached objection and submission

OBJECTION TO PLANNING PROPOSAL PP-2024-1593

Planning Proposal - Harbord Hotel (29-31 Moore Road and 64 Undercliff Road, Freshwater)

Submitted by: Name Withheld

Address: Neighbours of block of units at the R2 zoned 64 Undercliff Road (Lot 6, Section 1, DP 7022) and the separate existing Harbord Hotel site

Date: 15 August 2025

EXECUTIVE SUMMARY

We **object** to the proposed amendments to the Warringah LEP 2011 as currently formulated and submit that the proposed amendments should be **amended** to only include the "existing Harbord Hotel site (and bottle shop)" and not the block of units at the R2 zoned 64 Undercliff Road (Lot 6, Section 1, DP 7022) that are quite separate from the existing hotel (and separately owned).

This objection demonstrates that the planning proposal is **fundamentally flawed and premature** due to infrastructure constraints involving the drainage easement, stormwater and board's sewer that **effectively cut off 64 Undercliff Road from the rest of the site.**

RECOMMENDED SOLUTION: MODIFIED PROPOSAL

Our Suggested Amendment to the Warringah LEP 2011

Our suggested **amendment** to the stated proposed amendment to the Warringah LEP 2011 is as follows:

"Proposed amendments to the Warringah LEP 2011 include amending Clause 14 of Schedule 2 (Additional Permitted Uses) to permit with consent

- **hotel accommodation and pubs on Lot 6, Section 1, DP 7022, and**
- hotel accommodation on Lots 1-5 & Lot 13, Section 1, DP 7022."

Planning proposals

Under Exhibition

Planning Proposal - Harbord Hotel (29-31 Moore Rd and 64 Undercliff Rd, Freshwater)

Northern Beaches

The intention of the planning proposal is to facilitate the development and operation of hotel accommodation to be integrated and managed in association **with the existing Harbord Hotel site (and bottle shop).**

Proposed amendments to the Warringah LEP 2011 include amending Clause 14 of Schedule 2 (Additional Permitted Uses) to permit with consent:

- ~~-hotel accommodation and pubs on Lot 6, Section 1, DP 7022, and~~
- hotel accommodation on Lots 1-5 & Lot 13, Section 1, DP 7022.

Documents (13)

Activity Details

Number	PP-2024-1593
Stage	Gateway Implementation
Local government area	Northern Beaches
Date Review Commenced	31/07/2024
Relevant Planning Authority	Planning Panels

Rationale for Amendment

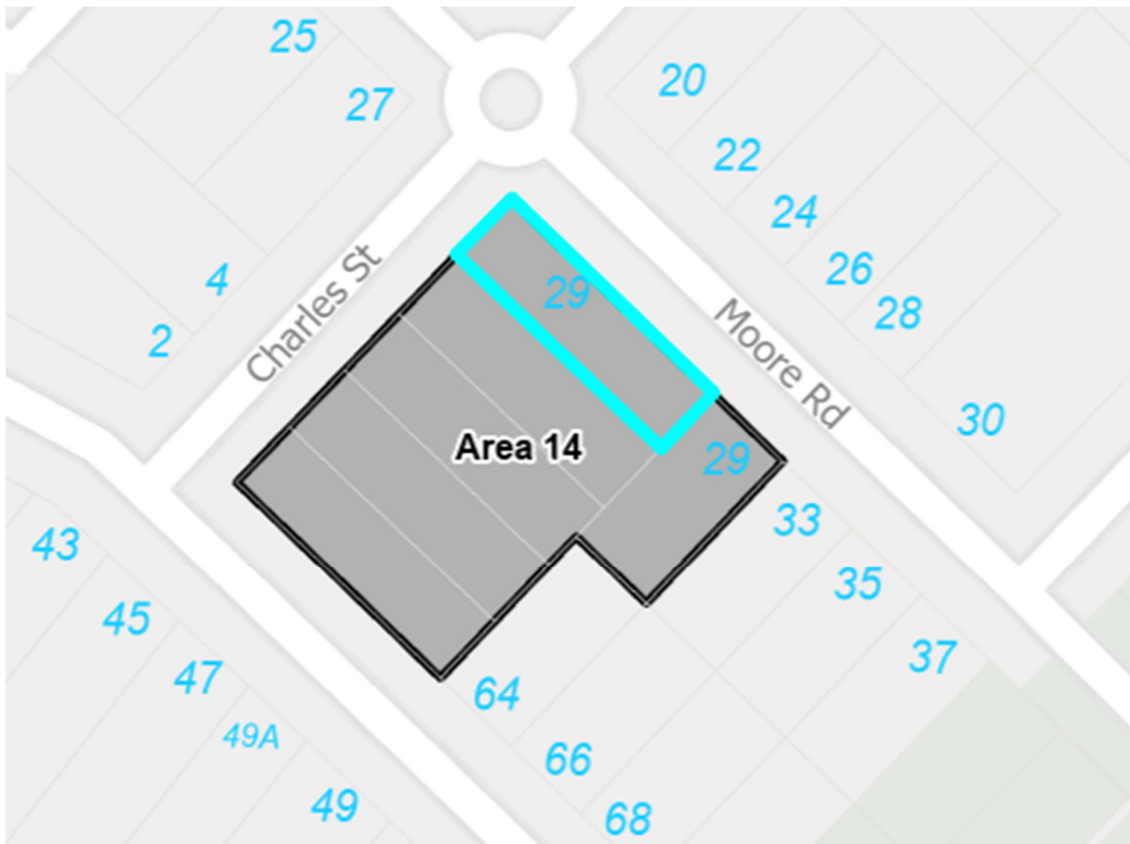
The amendment makes sense given that Lot 6, Section 1, DP 7022 (64 Undercliff Road) is:

- **Separately owned** by Freshwater Boutique Pty Ltd (as evidenced by the ASIC company extract and title search)
- Has **no existing special zoning**
- Is a **block of R2 zone units**
- Whose inclusion presents **insurmountable infrastructure issues** (detailed below)
- Which is not subject to a lease to Harbord Hotel Operations Pty Ltd (unlike the actual hotel site)

This amended proposed amendment would be more in line with the stated intention of the proposal as stated on the NSW Government Planning Proposal website for PP-2024-1593:

"The intention of the planning proposal is to facilitate the development and operation of hotel accommodation to be integrated and **managed in association with the existing Harbord Hotel site (and bottle shop).**"





DETAILED GROUNDS OF OBJECTION

1. SITE OWNERSHIP AND LEGAL SEPARATION

ASIC company extracts reveal that the owner of **64 Undercliff Road** is:

Freshwater Boutique Pty Ltd (ACN 633 340 431):

- **Glenn Michael Piper** is the Director and Secretary
- **GALP Holdings Pty Ltd (ACN 163 660 606)** owns 100% of shares in Freshwater Boutique Pty Ltd

GALP Holdings Pty Ltd (ACN 163 660 606):

- **Glenn Michael Piper** is the Director, Secretary and 100% shareholder

Therefore, Glenn Piper ultimately owns 64 Undercliff Road personally through his corporate structure, NOT the Harbord Hotel business entities.

The title searches confirm:

- **Lot 6, Section 1, DP 7022** (64 Undercliff Road) is owned by **Freshwater Boutique Pty Ltd** (Glenn Piper's personal company)
- **Lots 1-5 & Lot 13, Section 1, DP 7022** (hotel site) is owned by **Harbord Hotel Holdings Pty Ltd** (separate hotel business entity)

- There is a **lease to Harbord Hotel Operations Pty Ltd** on the hotel site but **no such lease exists** on 64 Undercliff Road

Critical Point: Lot 6, Section 1, DP 7022 (64 Undercliff Road) has nothing to do "**with the existing Harbord Hotel site (and bottle shop)**" except it is adjacent to the site and has been bought by Glenn Piper personally through his separate corporate structure. This is **not** a hotel business asset - it is a **personal real estate investment** by an individual who happens to be associated with the hotel.

See title and ASIC searches at end of this submission.

2. MANDATORY COASTAL DESIGN GUIDELINES COMPLIANCE FAILURE

2.1 Local Planning Direction 4.2 Requirements

Under Local Planning Direction 4.2 (Coastal Management), planning proposals that seek to amend a local environmental plan in the coastal zone must be consistent with the NSW Coastal Design Guidelines. This is the case unless an inconsistency can be justified in line with the requirements of the local planning direction. **All planning proposals in the coastal zone must, therefore, address the Coastal Design Guidelines.**

Local councils, landowners and developers, or their representatives, **must use the Coastal Design Guidelines when seeking to change planning controls in the coastal zone through a planning proposal.** Plan-making authorities must also use the guidelines to assess these planning proposals.

A planning proposal in the coastal zone must be consistent with the requirements and recommendations set out in section 3.2 of these guidelines, including the use of the assessment checklist at Appendix 1.

2.2 Chapter 3 Mandatory Requirements

Chapter 3 Planning proposals in the coastal zone – establishes the requirements for planning proposals in the coastal zone, including objectives and outcomes. To be consistent with Local Planning Direction 4.2 (Coastal Management), planning proposals in the coastal zone must apply these requirements.

Under Local Planning Direction 4.2 (Coastal Management), planning proposals that seek to amend a local environmental plan in the coastal zone must be consistent with the NSW Coastal Design Guidelines. To achieve this, the planning proposal authority and local plan-making authority will assess a proposal against the requirements set out in section 3.2 of these guidelines.

The assessment checklist in Appendix 1 is a guide to assessing if a planning proposal in the coastal zone puts these guidelines into practice. The planning proposal authority and local plan-making authority must use the checklist to record how they have considered the relevant requirements for each planning proposal.

2.3 Specific Compliance Failures

The proposal fails to properly address the following mandatory requirements:

Appendix 1 Outcome A.1h

A.1h Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater.

Response/Submission: The proposal contemplates the removal of necessary infrastructure from the site (council stormwater drainage and Sydney Water board sewer). **The Panel must consider A.1h at the planning proposal stage, not the DA stage.** The proposed 5-6m of excavation for the large carpark and building construction directly affects existing council drainage infrastructure and hydrological flows.

Outcome B.1a

B.1a Integrate development within the natural topography of the site and ensure land use, building scale and height respond sympathetically to coastal landforms.

Response/Submission: The proposed 5-6m of excavation for the large carpark and the building bulk and scale of 5 storeys right across the rear of the site is contrary to the natural topography of the site and unsympathetic to coastal landforms.

Outcome B.1d

B.1d Ensure that lot sizes, building heights and density are appropriate for the coastal settlement, and complement the existing or desired local character, supported by place-based strategies.

Response/Submission: The proposed building bulk and scale of 5 storeys are inappropriate for the coastal settlement and do not complement the existing or desired local character. The coastal setting is R2 residential. The proposed building height of 5 storeys and large footprint and bulk are inappropriate for the coastal settlement of largely residential buildings (R2 zoning) and does not complement the existing or desired local character of residential development.

Outcome C.1a

C.1a Ensure development does not harm heritage values or sites.

Response/Submission: There is no evidence that the proposal (including the 5-6m of excavation for the large carpark and the building bulk and scale of 5 storeys right across the rear of the site) will not harm the heritage value of the Harbord Hotel or the site. **The Panel must be positively satisfied in this regard. The Panel must consider C.1a at the planning proposal stage, not the DA stage.**

3. COUNCIL STORMWATER EASEMENT - LEGAL IMPEDIMENT TO DEVELOPMENT

3.1 Legal Working and Analysis

The council stormwater easement affecting 64 Undercliff Road creates an absolute legal barrier to the proposed development that cannot be overridden by planning instruments.

Legal Status of Council Stormwater Easements

Council stormwater easements in NSW receive multilayered legal protection that effectively prevents their override by planning approvals:

- **Registered property rights** under the Real Property Act 1900 creating legal interests in land

- **Statutory ownership** under section 59A of the Local Government Act 1993, giving councils ownership of drainage infrastructure "despite section 42 of the Real Property Act 1900"
- **Protected public authority rights** under registered instruments

Planning Law Cannot Override Council Easements

While recent case law in *Carey-Evans v Wu* [2022] NSWLEC established that some easements restricting development may be suspended by planning instruments, council stormwater easements are specifically exempt from this principle through multiple protections:

EPAA Section 3.16 Limitations:

- Requires Governor's approval before any regulatory instrument can be suspended
- No evidence of such approval exists for this proposal
- Council easements fall outside the scope of typical planning overrides

Warringah LEP Clause 1.9A Specific Protections:

- Subsection (2)(a) explicitly exempts covenants "imposed by the Council or that the Council requires to be imposed"
- Subsection (3) preserves "the rights or interests of any public authority under any registered instrument"
- Council stormwater easements receive double protection under both exceptions

This easement cannot be suspended, modified or overridden by planning instruments under EPAA section 3.16 or Warringah LEP clause 1.9A, both of which contain specific exemptions protecting council-imposed easements and public authority rights under registered instruments. Any development over or affecting this easement requires separate legal processes for easement modification - a threshold that has not been met.

3.2 Legal Nature of Stormwater Easements

The council stormwater easement is a registered easement creating a legal interest in land and public infrastructure rights under the Local Government Act 1993. **Schedule 8 of the Conveyancing Act 1919 specifically defines "easement to drain water" as providing "full and free right to drain water (whether rain, storm, spring, soakage, or seepage water) in any quantities across and through the land."** These are created through section 88B instruments on deposited plans, registered transfers, or court orders under section 88K.

4. INFRASTRUCTURE CONSTRAINTS THAT HAVE COME TO LIGHT

The original justification for including 64 Undercliff Road can no longer be maintained due to infrastructure constraints that effectively cut off this lot from the rest of the site.

Critical Infrastructure Barriers:

- **Drainage easement, stormwater and board's sewer effectively cut off 64 Undercliff Road** from the rest of the site

- **Cannot concrete over board sewer** because it is in or near the easement
- **Cannot relocate board sewer** because of physical constraints at 66 Undercliff Road
- **Cannot move stormwater down street** - very expensive and disruptive to the community

4.1 Site-Specific Merit Test Failure

In our submission the applicant has **failed to establish** that the proposal (to extend the hotel accommodation 2 storeys below the existing stormwater and board's sewer) and across the drainage easement, stormwater and board's sewer that run down the east side of the site, into and across 64 Undercliff Road is viable from a **(mandatory) site specific perspective**.

Under Planning Circular PS 16-004, proposals must demonstrate site-specific merit regarding "the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision".

Fatal failure: The proposal cannot demonstrate infrastructure is "available" when:

- Critical drainage easement prevents typical development
- No Sydney Water approval for board sewer works provided
- No Council approval for development over drainage easement under Policy D100
- No financial arrangements exist for infrastructure provision
- Technical constraints prevent infrastructure relocation or modification

4.2 Impact on Existing Infrastructure

In particular, in relation to existing infrastructure, the applicant has **failed to establish that there is site specific merit** for the proposal.

In terms of two aspects of infrastructure:

- **Council has already indicated the proposal will be refused** in terms of the storm water relocation proposal
- **Sydney Water are unlikely to agree** to planned relocation of the board's sewer (the applicant failing to provide a letter of support from Sydney Water as part of its application)

4.3 Legal Authority for Upfront Assessment

On the authority of *Moorebank Recyclers Pty Ltd v Tanlane Pty Ltd* [2018] NSWCA 304, these matters **cannot be kicked down the road** - the impact on infrastructure under NSW Coastal Design Guidelines 2023 as per relevant Local Planning Directions must be considered upfront.

In *Georges River Council v Eskander* [2024], the NSW Land and Environment Court established that essential services create **jurisdictional preconditions** requiring "tangible pre-existing arrangements" before development consent. The Court rejected deferred commencement conditions where infrastructure is inadequate.

4.4 Absence of Evidence

The applicant has **failed to provide any evidence** that:

1. Changes to stormwater are viable
2. Changes to Board's Sewer are viable
3. It is legally possible to build over the drainage easement and/or have the easement revoked (for example by way of a legal opinion)

As Per Local Planning Direction 4.2, the Panel must consider section 3.2 of these Design Guidelines and complete Annexure 1 Checklist.

The requirement specifically states "**Consider direct and indirect effects of development, including any necessary infrastructure**" - this encompasses all infrastructure impacts, not just water quality effects. The guidelines also include specific provisions for protecting essential infrastructure under Outcome E.5.

5. ADVANTAGES OF THE SUGGESTED AMENDMENT

The above suggested amendment has the following **advantages**:

- **Retains existing affordable housing** at 64 Undercliff Road during Sydney's housing crisis
- **Encourages a more modest proposal** on the actual hotel site that works with existing infrastructure
- **Avoids insurmountable (or hugely expensive relocated) infrastructure issues**
- **Consistent with stated intention** of proposal to develop hotel accommodation "in association with the existing Harbord Hotel site"
- **Provides a buffer** between hotel development and 66-70 Undercliff Road
- **Eliminates construction disruption** from 200m of street works along Undercliff Road
- **Enables lawful approval** without creating unreasonable infrastructure burden
- **Ensures compliance** with mandatory NSW Coastal Design Guidelines requirements
- **Avoids legal challenges** from inadequate infrastructure assessment

CONCLUSION

64 Undercliff Road should be removed from the planning proposal. The original justification can no longer be maintained due to infrastructure constraints that have come to light and mandatory compliance failures with the NSW Coastal Design Guidelines 2023.

A **more modest proposal** focusing on the actual hotel site (Lots 1-5 & Lot 13, Section 1, DP 7022) would be:

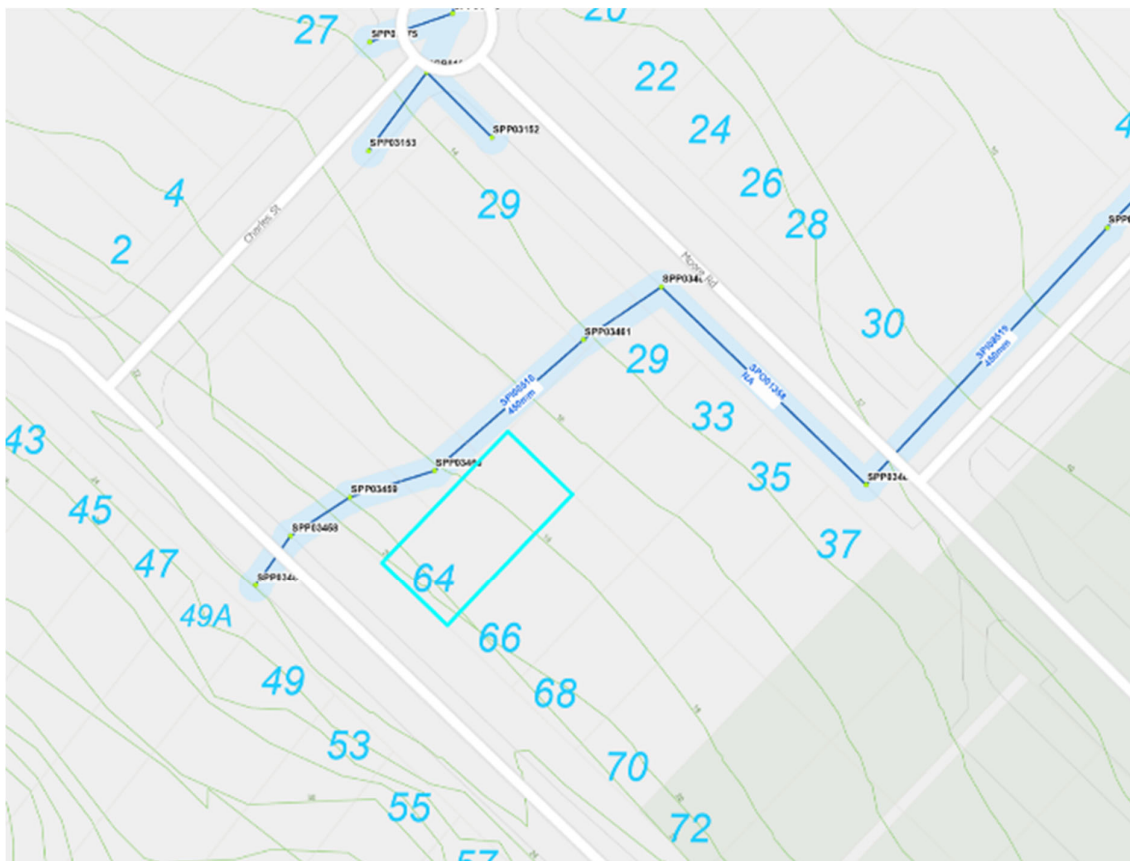
- More appropriate and technically viable
- Consistent with the stated intention of the proposal
- Able to satisfy all statutory requirements including Local Planning Direction 4.2

- Respectful of existing residential accommodation during a housing crisis
- Compliant with mandatory coastal design guidelines
- Free from insurmountable legal impediments posed by protected council infrastructure

Only the site owned by the hotel and currently run as a hotel is arguably suitable for rezoning. The stated intention of the proposal makes no mention of an adjacent block of units and it is inappropriate for it to be included in the rezoning.

The answer to whether council stormwater easements can be overridden is definitively no under current NSW law. While the *Carey-Evans* decision revolutionized the treatment of private easements that restrict development, council drainage easements benefit from comprehensive statutory protection that planning instruments cannot penetrate.

We respectfully request that the Department approve the planning proposal with the condition that **64 Undercliff Road (Lot 6, Section 1, DP 7022) be excluded from the re-zoning**, keeping it as R2 Low Density Residential. Any approval granted without proper consideration of the mandatory coastal design guidelines requirements would be legally invalid and subject to successful judicial review.



SUBMISSION TO DEPARTMENT OF PLANNING ON HARBORD HOTEL PLANNING PROPOSAL

EXECUTIVE SUMMARY

This submission objects to the Harbord Hotel Planning Proposal (PP-2024-1593) on the grounds that it fails to meet mandatory requirements under NSW planning law, particularly Local Planning Direction 4.2 (Coastal Management) and the NSW Coastal Design Guidelines 2023. The proposal also faces insurmountable legal barriers from protected council infrastructure that cannot be overridden by planning instruments.

1. MANDATORY COASTAL DESIGN GUIDELINES COMPLIANCE FAILURE

1.1 Local Planning Direction 4.2 Requirements

Under Local Planning Direction 4.2 (Coastal Management), planning proposals that seek to amend a local environmental plan in the coastal zone must be consistent with the NSW Coastal Design Guidelines. This is the case unless an inconsistency can be justified in line with the requirements of the local planning direction. **All planning proposals in the coastal zone must, therefore, address the Coastal Design Guidelines.**

Local councils, landowners and developers, or their representatives, **must use the Coastal Design Guidelines when seeking to change planning controls in the coastal zone through a planning proposal.** Plan-making authorities must also use the guidelines to assess these planning proposals.

A planning proposal in the coastal zone must be consistent with the requirements and recommendations set out in section 3.2 of these guidelines, including the use of the assessment checklist at Appendix 1.

1.2 Chapter 3 Mandatory Requirements

Chapter 3 Planning proposals in the coastal zone – establishes the requirements for planning proposals in the coastal zone, including objectives and outcomes. To be consistent with Local Planning Direction 4.2 (Coastal Management), planning proposals in the coastal zone must apply these requirements.

Under Local Planning Direction 4.2 (Coastal Management), planning proposals that seek to amend a local environmental plan in the coastal zone must be consistent with the NSW Coastal Design Guidelines. To achieve this, the planning proposal authority and local plan-making authority will assess a proposal against the requirements set out in section 3.2 of these guidelines.

The assessment checklist in Appendix 1 is a guide to assessing if a planning proposal in the coastal zone puts these guidelines into practice. The planning proposal authority and local plan-making authority must use the checklist to record how they have considered the relevant requirements for each planning proposal.

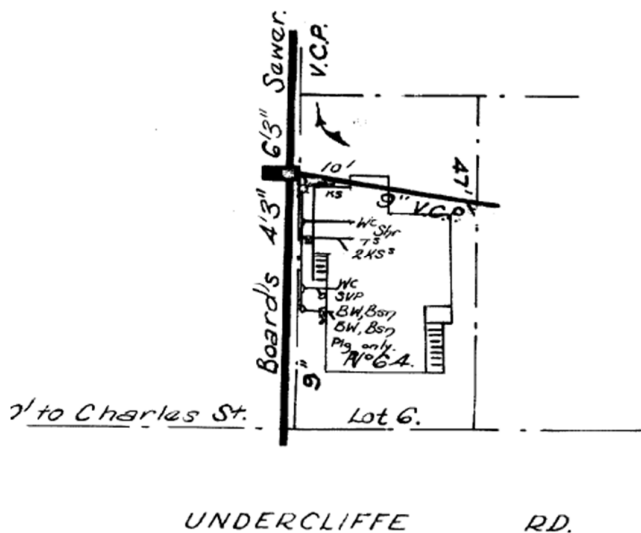
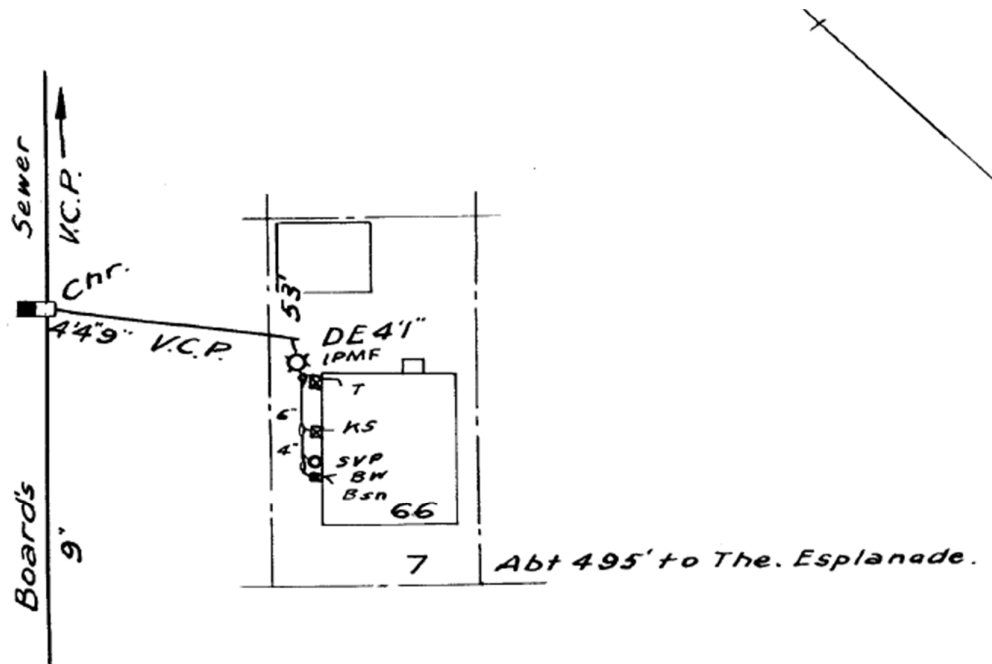
1.3 Specific Compliance Failures

The proposal fails to properly address the following mandatory requirements:

Appendix 1 Outcome A.1h

A.1h Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater.

Response/Submission: The proposal contemplates the removal of necessary infrastructure from the site (council stormwater drainage and Sydney Water board sewer). **The Panel must consider A.1h at the planning proposal stage, not the DA stage.** The proposed 5-6m of excavation for the large carpark and building construction directly affects existing council drainage infrastructure and hydrological flows.



Outcome B.1a

B.1a Integrate development within the natural topography of the site and ensure land use, building scale and height respond sympathetically to coastal landforms.

Response/Submission: The proposed 5-6m of excavation for the large carpark and the building bulk and scale of 5 storeys right across the rear of the site is contrary to the natural topography of the site and unsympathetic to coastal landforms.

Outcome B.1d

B.1d Ensure that lot sizes, building heights and density are appropriate for the coastal settlement, and complement the existing or desired local character, supported by place-based strategies.

Response/Submission: The proposed building bulk and scale of 5 storeys are inappropriate for the coastal settlement and do not complement the existing or desired local character. The coastal setting is R2 residential. The proposed building height of 5 storeys and large footprint and bulk are inappropriate for the coastal settlement of largely residential buildings (R2 zoning) and does not complement the existing or desired local character of residential development.

Outcome C.1a

C.1a Ensure development does not harm heritage values or sites.

Response/Submission: There is no evidence that the proposal (including the 5-6m of excavation for the large carpark and the building bulk and scale of 5 storeys right across the rear of the site) will not harm the heritage value of the Harbord Hotel or the site. **The Panel must be positively satisfied in this regard. The Panel must consider C.1a at the planning proposal stage, not the DA stage.**

1.4 Infrastructure Assessment Requirements

As Per Local Planning Direction 4.2, the Panel must consider section 3.2 of these Design Guidelines and complete Annexure 1 Checklist.

Regarding your query about whether A.1h is limited to water quality, the guidelines establish that infrastructure must be comprehensively considered. The requirement specifically states "**Consider direct and indirect effects of development, including any necessary infrastructure**" - this encompasses all infrastructure impacts, not just water quality effects. The guidelines also include specific provisions for protecting essential infrastructure under Outcome E.5:

- **E.5a** Locate and design essential infrastructure to reduce vulnerability to current and projected future coastal hazards
- **E.5b** Where exposure to coastal hazards cannot be avoided, prepare adaptation plans for essential service infrastructure
- **E.5c** Consult local Aboriginal land management experts and emergency management agencies on how to strategically locate access routes and other essential infrastructure

[illegible]

The council stormwater easement affecting 64 Undercliff Road creates an absolute legal barrier to the proposed development that cannot be overridden by planning instruments.

Council stormwater easements in NSW receive multilayered legal protection that effectively prevents their override by planning approvals:

- ## Planning Law Cannot Override Council Easements

EPAA Section 3.16 Limitations:

- 13

- Council easements fall outside the scope of typical planning overrides

Warringah LEP Clause 1.9A Specific Protections:

- Subsection (2)(a) explicitly exempts covenants "imposed by the Council or that the Council requires to be imposed"
- Subsection (3) preserves "the rights or interests of any public authority under any registered instrument"
- Council stormwater easements receive double protection under both exceptions

Northern Beaches Council Policy

Northern Beaches Council Policy D100 states that "construction of buildings or other permanent structures over the public drainage easement is not permitted" unless exceptional criteria are met. The applicant has provided:

- No Council approval for development over the easement
- No evidence that exceptional criteria can be satisfied
- No legal opinion demonstrating the easement can be modified or extinguished

Fundamental Legal Distinction

This easement cannot be suspended, modified or overridden by planning instruments under EPAA section 3.16 or Warringah LEP clause 1.9A, both of which contain specific exemptions protecting council-imposed easements and public authority rights under registered instruments. Any development over or affecting this easement requires separate legal processes for easement modification - a threshold that has not been met.

2.2 Planning Proposal Must Address Infrastructure Upfront

Under the authority of *Moorebank Recyclers Pty Ltd v Tanlane Pty Ltd* [2018] NSWCA 304, infrastructure impacts cannot be deferred to the DA stage. The fundamental legal impediment posed by the council stormwater easement must be resolved at the planning proposal stage, not left for future determination.

2.3 Legal Nature of Stormwater Easements

The council stormwater easement is a registered easement creating a legal interest in land and public infrastructure rights under the Local Government Act 1993. **Schedule 8 of the Conveyancing Act 1919 specifically defines "easement to drain water" as providing "full and free right to drain water (whether rain, storm, spring, soakage, or seepage water) in any quantities across and through the land."** These are created through section 88B instruments on deposited plans, registered transfers, or court orders under section 88K.

The legal nature test remains clear: if an instrument grants a right to use land, it creates an easement; if it imposes an obligation regarding land use, it creates a covenant. NSW courts examine the substance of the right or obligation rather than the label used in documents, and these categories remain mutually exclusive under property law principles.

3. MANDATORY SITE-SPECIFIC MERIT TEST FAILURE

Under Planning Circular PS 16-004, proposals must demonstrate site-specific merit regarding "the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision".

Fatal failure: The proposal cannot demonstrate infrastructure is "available" when:

- Critical drainage easement prevents typical development
- No Sydney Water approval for board sewer works provided
- No Council approval for development over drainage easement under Policy D100
- No financial arrangements exist for infrastructure provision
- Technical constraints prevent infrastructure relocation or modification

Legal precedent: In *Georges River Council v Eskander* [2024], the NSW Land and Environment Court established that essential services create **jurisdictional preconditions** requiring "tangible pre-existing arrangements" before development consent. The Court rejected deferred commencement conditions where infrastructure is inadequate.

4. HERITAGE IMPACT ASSESSMENT INADEQUACY

The proposal fails to demonstrate consistency with Outcome C.1a of the Coastal Design Guidelines, which requires ensuring development does not harm heritage values or sites. The massive scale of excavation (5-6m) and the inappropriate building bulk (5 storeys across the rear) present unassessed risks to the heritage-listed Harbord Hotel.

5. CONCLUSION AND RECOMMENDATION

The Planning Proposal should be refused as it:

1. **Fails mandatory compliance** with Local Planning Direction 4.2 and NSW Coastal Design Guidelines 2023
2. **Cannot overcome legal impediments** posed by protected council infrastructure
3. **Lacks site-specific merit** due to infrastructure constraints
4. **Inadequately addresses heritage impacts** at the planning proposal stage

The Panel must complete the mandatory Appendix 1 assessment checklist before any approval can be validly granted. The infrastructure constraints identified are not technical issues to be resolved later, but fundamental legal barriers that prevent the proposed development from proceeding as currently formulated.

The answer to whether council stormwater easements can be overridden is definitively no under current NSW law. While the *Carey-Evans* decision revolutionized the treatment of private easements that restrict development, council drainage easements benefit from comprehensive statutory protection that planning instruments cannot penetrate.

Any approval granted without proper consideration of these mandatory requirements would be legally invalid and subject to successful judicial review.

Schedule of images

Please refer to the images set out below.

Schedule of images

Planning proposals

Under Exhibition

Planning Proposal - Harbord Hotel (29-31 Moore Rd and 64 Undercliff Rd, Freshwater)

Northern Beaches

The intention of the planning proposal is to facilitate the development and operation of hotel accommodation to be integrated and managed in association with the existing Harbord Hotel site (and bottle shop).

Proposed amendments to the Warringah LEP 2011 include amending Clause 14 of Schedule 2 (Additional Permitted Uses) to permit with consent:

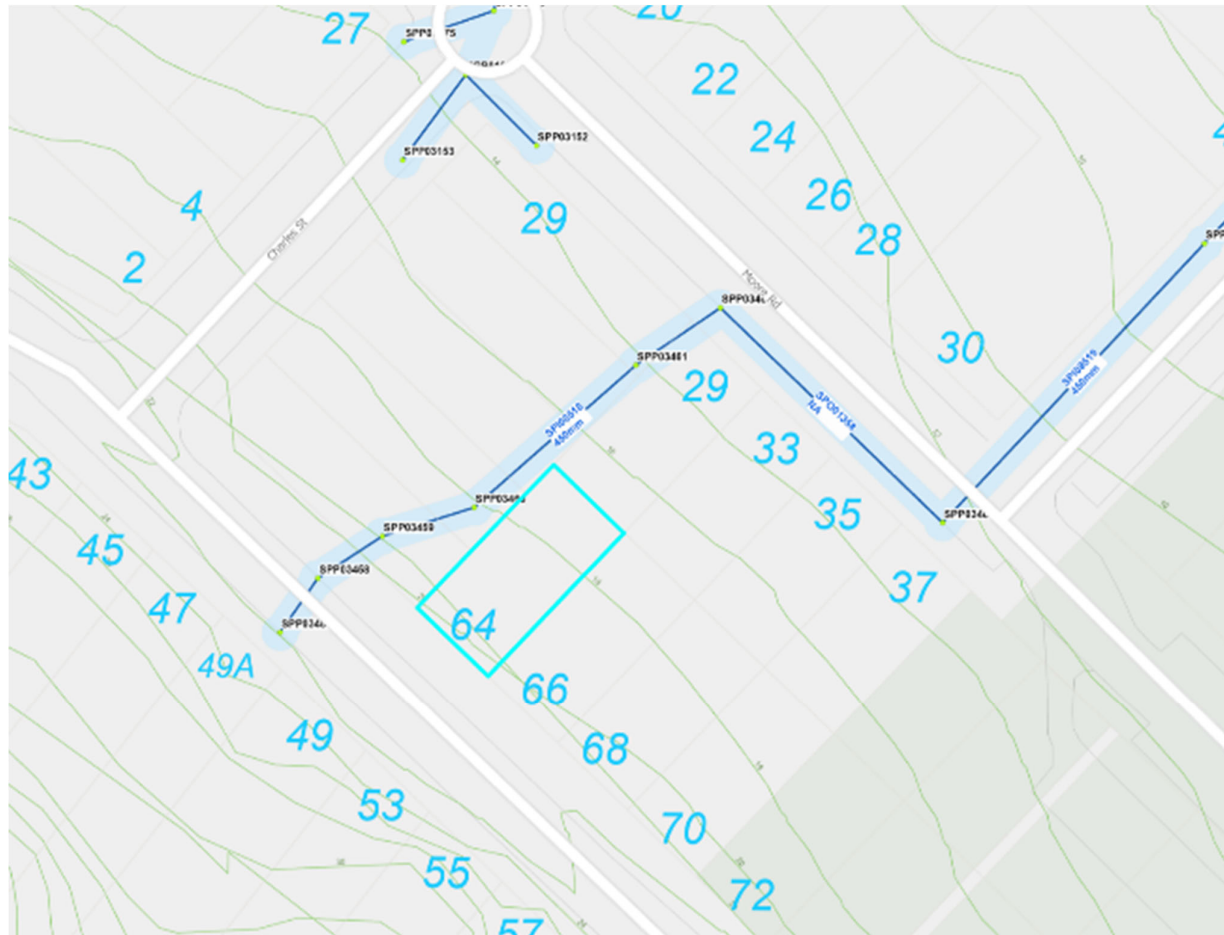
~~hotel accommodation and pubs on Lot 6, Section 1, DP 7022, and~~
-hotel accommodation on Lots 1-5 & Lot 13, Section 1, DP 7022.

Documents (13)

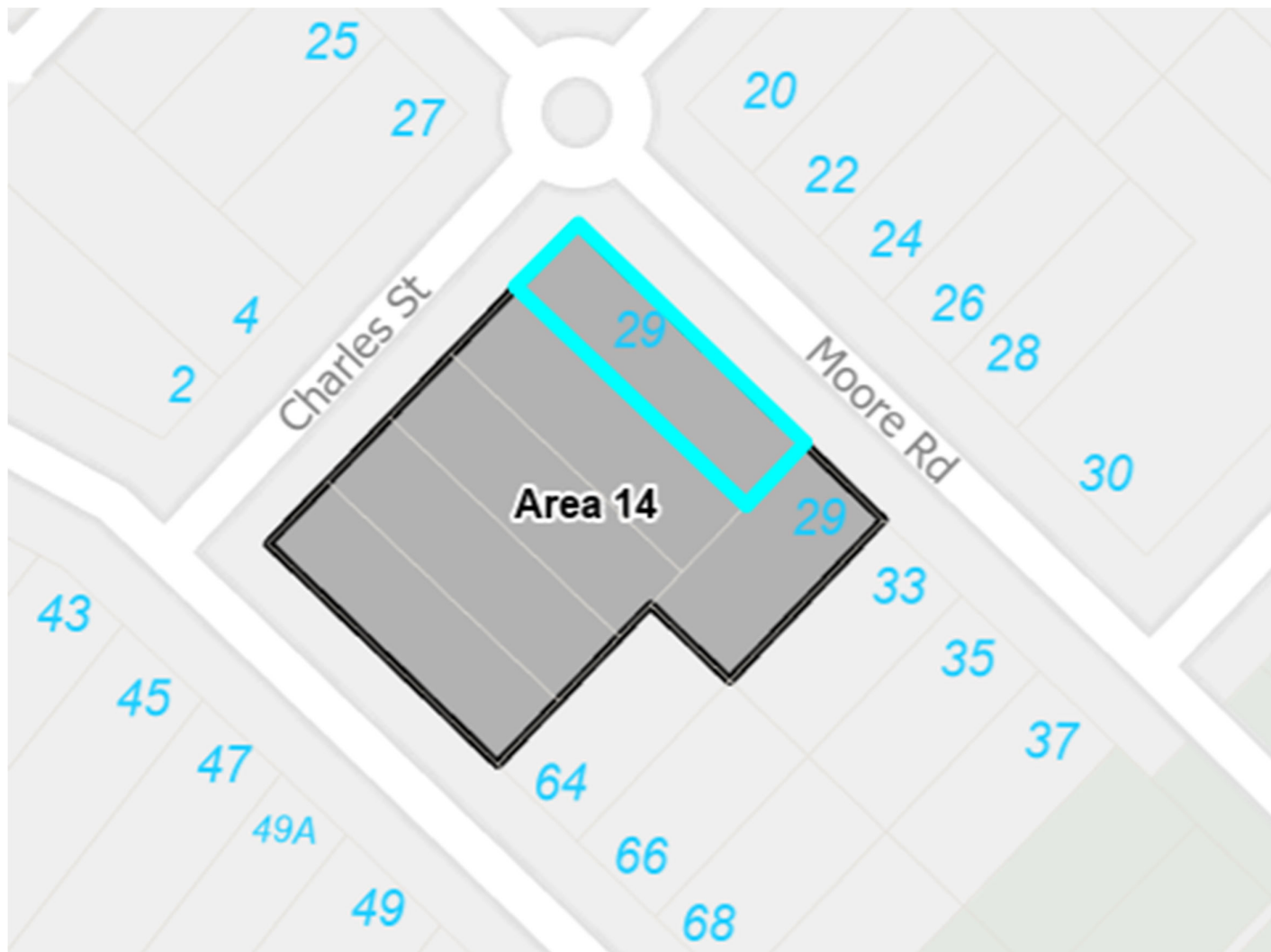
Activity Details

Number	PP-2024-1593
Stage	Gateway Implementation
Local government area	Northern Beaches
Date Review Commenced	31/07/2024
Relevant Planning Authority	Planning Panels

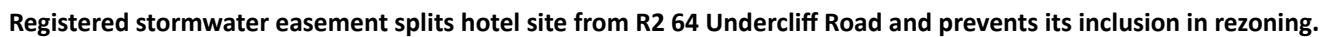
64 Undercliff Road (ie Lot 6, Section 1, DP 7022) has nothing to do with “the existing Harbord Hotel site (and bottle shop)” and should not be included in the proposed rezoning.

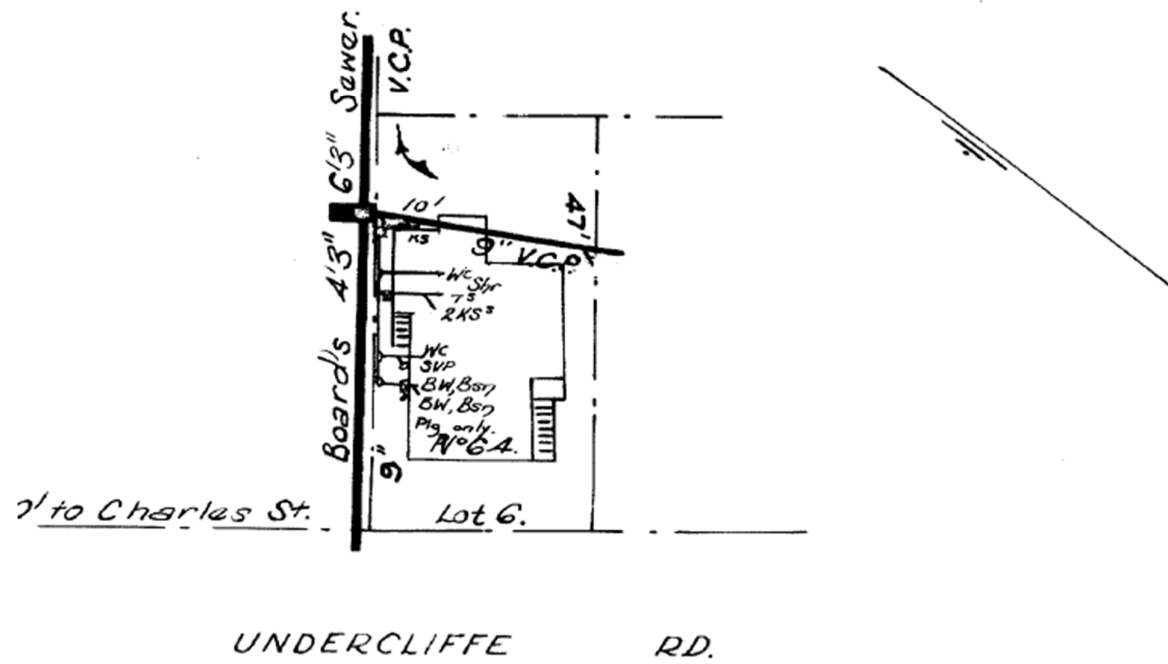


Stormwater (and board sewer) and easement sever R2 block of units at 64 Undercliff from actual hotel site, Area 14.

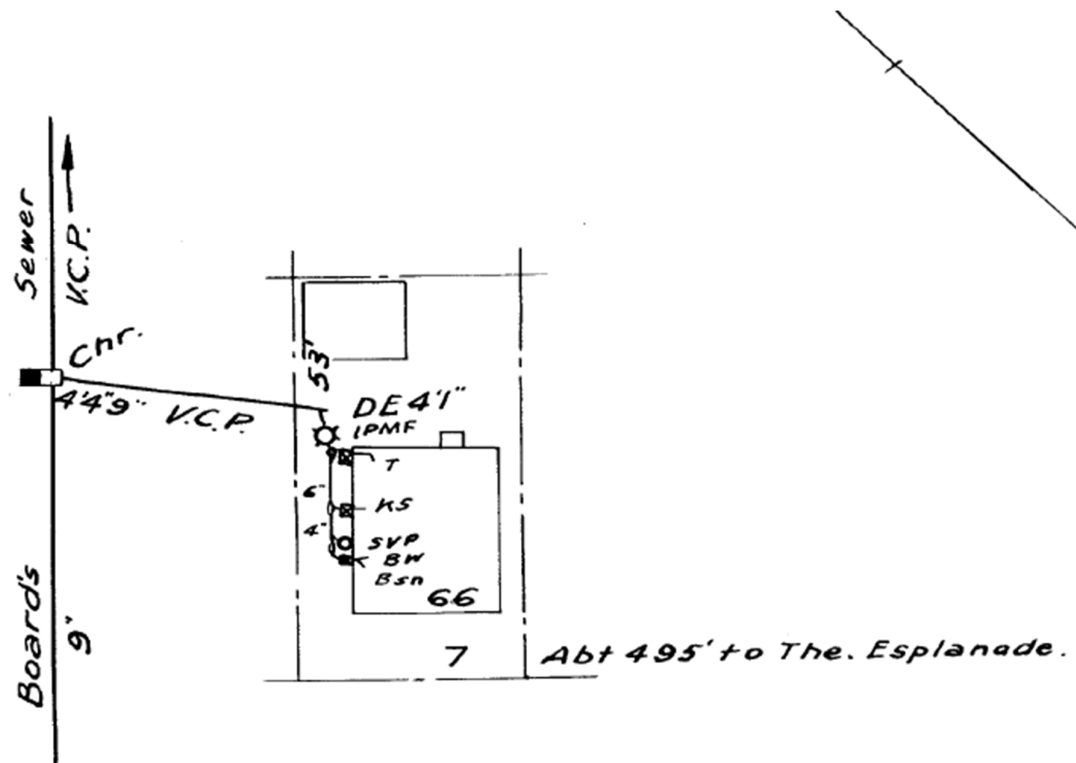


“the existing Harbord Hotel site (and bottle shop)”, ie specially zoned Area 14, does NOT include R2 zoned 64 Undercliff Road.





Board sewer and registered stormwater easement splits hotel site from R2 64 Undercliff Road and prevents its inclusion in rezoning



Not viable to lower board sewer to below 2 storey basement carpark given 66 Undercliff use of board sewer.



Affordable housing at 64 Undercliff Road is not part of “the existing Harbord Hotel site (and bottle shop)”, ie specially zoned Area 14, does NOT include R2 zoned 64 Undercliff Road



Affordable housing at 64 Undercliff Road is not part of “the existing Harbord Hotel site (and bottle shop)”, ie specially zoned Area 14, does NOT include R2 zoned 64 Undercliff Road



Proposed relocation of stormwater down Undercliff Road towards beach is not viable.



64 Undercliff Road

FRESHWATER

All information contained herein is gathered from sources we consider to be reliable. However we cannot guarantee or give any warranty about the information provided and interested parties must verify any of their own enquiries. General Site plan is an indication only of the layout of the land and may not be completely accurate.

Affordable housing at 64 Undercliff Road is not part of “the existing Harbord Hotel site (and bottle shop)”, ie specially zoned Area 14, does NOT include R2 zoned 64 Undercliff Road



FOLIO: AUTO CONSOL 15496-245

SEARCH DATE	TIME	EDITION NO	DATE
3/11/2024	10:06 AM	6	28/8/2024

LAND

LAND DESCRIBED IN SCHEDULE OF PARCELS
AT HARBORD
LOCAL GOVERNMENT AREA NORTHERN BEACHES
PARISH OF MANLY COVE COUNTY OF CUMBERLAND
TITLE DIAGRAM DP7022

FIRST SCHEDULE

HARBORD HOTEL HOLDINGS PTY LTD (T AP892582)

SECOND SCHEDULE (7 NOTIFICATIONS)

- 1 RESERVATIONS AND CONDITIONS IN THE CROWN GRANT(S)
- 2 A70888 EASEMENT FOR DRAINAGE AFFECTING THE PART OF THE LAND SHOWN AS "1.83 WIDE" IN DP7022
- 3 A73801 COVENANT AFFECTING LOTS 3, 4 & 5 IN DP7022
- 4 A79451 COVENANT AFFECTING LOT 2 IN DP7022
- 5 A279625 COVENANT AFFECTING LOT 1 IN DP7022
- 6 AQ42222 LEASE TO HARBORD HOTEL OPERATIONS PTY LTD EXPIRES: 10/2/2025. OPTION OF RENEWAL: 5 YEARS.
AU364130 MORTGAGE OF LEASE AQ42222 TO JUDO BANK PTY LTD
- 7 AU364134 MORTGAGE TO JUDO BANK PTY LTD

NOTATIONS

UNREGISTERED DEALINGS: NIL

SCHEDULE OF PARCELS

LOTS 1-5 SEC. 1 IN DP7022.

*** END OF SEARCH ***

Title search shows registered easement burdening the hotel site

Title search shows owner as Harbord Hotel Holdings.

Title search also shows registered lease to Hotel Operations.



LAND
REGISTRY
SERVICES

Title Search



NEW SOUTH WALES LAND REGISTRY SERVICES - TITLE SEARCH

FOLIO: 6/1/7022

SEARCH DATE	TIME	EDITION NO	DATE
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3/11/2024	7:09 PM	8	29/8/2024

LAND

LOT 6 OF SECTION 1 IN DEPOSITED PLAN 7022
AT HARBORD
LOCAL GOVERNMENT AREA NORTHERN BEACHES
PARISH OF MANLY COVE COUNTY OF CUMBERLAND
TITLE DIAGRAM DP7022

FIRST SCHEDULE

FRESHWATER BOUTIQUE PTY LTD (T AP551060)

SECOND SCHEDULE (3 NOTIFICATIONS)

- 1 RESERVATIONS AND CONDITIONS IN THE CROWN GRANT(S)
- 2 A200228 COVENANT
- 3 AU364132 MORTGAGE TO PHYKAT PTY. LIMITED & PLN (NO 2) PTY LTD

NOTATIONS

UNREGISTERED DEALINGS: NIL

*** END OF SEARCH ***

Title search shows owner is NOT as Harbord Hotel Holdings.

Title search shows owner is Freshwater Boutique, ultimate owned by Glen Piper, see below ASIC company search extracts.

Title search also shows NO registered lease to Hotel Operations.

Current & Historical Company Extract

FRESHWATER BOUTIQUE PTY LTD

ACN 633 340 431

Appointment date:	08/05/2019
Secretary	
Name:	GLENN MICHAEL PIPER 0ELD70204
Address:	78 Carrington Parade, CURL CURL NSW 2096
Born:	21/02/1987, WESTMEAD, NSW
Appointment date:	08/05/2019
Previous Secretary	
Name:	ALAN RICHMOND BRAWN 7EAW72534
Address:	14 Killcare Road, KILLCARE NSW 2257
Born:	05/04/1945, LISMORE, NSW
Appointment date:	21/05/2020
Cease date:	28/02/2022

Share Information

Share Structure

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	100	100.00	0.00	0ELD70204

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: GALP HOLDINGS PTY LTD

ACN: 163 660 606

Address: 29-31 Moore Road, FRESHWATER NSW 2096

Class	Number held	Beneficially held	Paid	Document number
ORD	100	no	FULLY	2EQH46372

Previous Members

Name: GLENN MICHAEL PIPER

Address: 78 Carrington Parade, CURL CURL NSW 2096

Class	Number held	Beneficially held	Paid	Document number
ORD	100	yes	FULLY	0ELD70204

Contact Address

Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.

Historical

Address:	GPO BOX 3555, SYDNEY NSW 2001
Start date:	27/05/2015
Cease date:	09/06/2016
Address:	PO BOX 503, BRIGHTON-LE-SANDS NSW 2216
Start date:	17/06/2013
Cease date:	27/05/2015

Officeholders and Other Roles**Document Number****Director**

Name:	GLENN MICHAEL PIPER	7E8040689
Address:	78 Carrington Parade, CURL CURL NSW 2096	
Born:	21/02/1987, WESTMEAD, NSW	
Appointment date:	08/05/2013	

Secretary

Name:	GLENN MICHAEL PIPER	7E8040689
Address:	78 Carrington Parade, CURL CURL NSW 2096	
Born:	21/02/1987, WESTMEAD, NSW	
Appointment date:	02/02/2015	

Previous Director

Name:	ALAN RICHMOND BRAWN	7EAJ01488
Address:	Unit 4, 64 Shirley Road, WOLLSTONECRAFT NSW 2065	
Born:	05/04/1945, LISMORE, NSW	
Appointment date:	21/02/2019	
Cease date:	20/03/2019	

Share Information**Share Structure**

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	6	6.00	0.00	1E9349397

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: GLENN MICHAEL PIPER
Address: 78 Carrington Parade, CURL CURL NSW 2096

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am a 31 year old woman who has lived in the “White Waves” Freshwater apartment (30 Moore Road) block for the last 11 years. I find these proposed plans to the Harbord Hotel deeply troubling for several reasons, and my husband and I strongly oppose. The renovations a few years back, and the more recent opening of the top balcony level, has caused not only noise issues but it has also impacted the community due to parking and changed the charm of an iconic pub. With these new proposed plans, this only further impacts the community in regards to the above issues I have already raised but also the re-zoning compromises the character of Freshwater as a quiet, family suburb - this proposal clearly highlights a business who is hungry to just make money and does not consider the local community or the history of our suburb by any means. I please ask you dismiss this proposed plan.

Submission Type

I am making a personal submission

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

ROSE BAY

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I sincerely hope common sense will prevail with the Dept of Planning decision on the overdevelopment of the Iconic Harbord Hotel in Freshwater.

One greedy Hotel owner, cannot be allowed to destroy a beautiful beloved one of the best residential locations in Sydney by being allowed to build a "Hilton Hotel".

This will destroy forever this beautiful quiet, sleepy hollow. It will attract many undesirables to this area, with their appalling selfish

behaviour, throwing their rubbish in locals gardens, urinating in the streets, being loud yahoos.

If the Planning Dept allow this overdevelopment you are setting a very dangerous precedent for many other developers to buy properties in residential areas to set up their businesses.

Last year there was a huge overwhelming outcry by the local community against this overdevelopment.

Dept of Planning responsibility is NOT to the Hotel owner so he can make lots of money at the expense of the entire local community. Your responsibility is to protect the streetscape, quality of life of the entire local community

<https://manlyobserver.com.au/mixed-community-views-as-harbord-hotel-is-set-to-become-well-a-hotel/>

Submission Type

I am making a personal submission

Title**First Name**

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Wilberforce

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I am an owner of a unit across the street from the Harbord Hotel and have been visiting or living in the area for about 60 years. The government seems determined to turn what was a family hotel into an entertainment complex right in the middle of a residential area.

This will force more residences into becoming Airbnbs at a time when we have a housing crisis in the city. The noise is not conducive for people living in the area who have to get up and work the next day.

As for the behaviour of the people visiting the pub - it is appalling, parking is impossible in summer, and the roads are dangerous

because of the increase in traffic.

I strongly objec to any further development of the Harbord Hotel.

Submission Type

I am making a personal submission

Title

Dr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

We live at [REDACTED] on the corner with Charles St directly opposite the Harbord Hotel. We have previously expressed concern about the development to place large numbers of patrons on external balconies and opposition to the second level development with the potential for substantial extra noise and loss of privacy for houses across Moore Road. The homes near the hotel are only 20 meters or so from the hotel space! The main problem with these developments even if the Hotel noise and privacy issues can be addressed - which remains to be seen for a summer period for the upstairs development which includes a music venue - is the noise created by people and related traffic movements. A community hotel which the nearby residents regularly frequented by a short walk has been turned into a destination for large numbers of external people who disrupt the area on arrival and many end up inebriated

and noisily leaving the Hotel late at night when residents are trying to sleep. The total lack of parking and easy traffic flow alone should be reason to question the developments. Again the community starts 20m from the Hotel space in three directions and is adjoining on the fourth. Allowing the rezoning to build the planned accomodation would be a serious betrayal of the community of families and retirees who leave in the area nearby. The accommodation can only serve to provide patrons for the Hotel further exacerbating the noise and traffic problems already inflicted upon us.

[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

We strongly object to the planning proposal in relation to the Harbord Hotel and the rezoning of a current residential zone to an LEP.

There are a number of reasons for the objection:

- Rezoning of additional land to LEP
- Traffic and Parking concerns
- Public transport capacity concerns
- Current Freshwater infrastructure in the area

- Degrading the current residential owners land and property for limited beneficiaries
- Changing the nature of the suburb and area
- Tenuous justification of rationale for hotel (ie. Cultural claims, transport rationale, etc)

Rezoning of additional land to LEP: The proposal anticipates rezoning a current residential area to LEP. Recent changes to the current pub has already resulted in increased traffic, noise and increased foot traffic late at night. The extension of the LEP creates the potential for this to increase further in the future, impacting local residents further.

Traffic and Parking concerns: Currently the area already has traffic and parking issues. There is a lack of parking, which results in traffic congestion and dangerous driving. Local residents often cannot access street parking given it is unrestricted. The hotel will add to this issue. Current parking appears exasperated as the hotel parking is for patrons, not staff. They are observed parking in the street. The additional parking for the accommodation numbers, therefore staff and visitors will require parking on the street. The proposed parking is unlikely to meet the additional requirements for the hotel guests and staff.

Public transport: The transport Study completed for the development is misleading regarding current public transport and options. There is a minimal bus service offered in the morning into the city and in the evening from the city. This is not adequate and unlikely to meet hotel requirements. Current public transport is frequently already at its limit, and will not have the capacity for additional users. Patrons, staff and visitors to the hotel will have very limited options than personal transport to access the area.

Current Freshwater infrastructure in the area: Freshwater infrastructure currently meets the needs of a local residential area. It is not adequate for a hotel patrons and associated support. For example, there are no footpaths on the street they intend building the hotel on. The roads are adequate to support local traffic, but will be dangerous with the increased traffic volume anticipated. The local infrastructure would need to be overhauled to support the hotel and local residents appropriately.

Tenuous justification of rationale for hotel (ie. Cultural claims, transport rationale, etc):

The current submission includes a number of statements that do not reconcile with our understanding of the area or the infrastructure. It appears to lack detailed consideration of specifics relevant to the suburb and residents.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

To whom it may concern,

Submission Objecting to Planning Proposal – Harbord Hotel, Freshwater

I object to the planning proposal to amend the Warringah Local Environmental Plan 2011 to permit a 37-room hotel at 29–31 Moore Road and 64 Undercliff Road, Freshwater. The proposal is inconsistent with Northern Beaches Council planning and NSW legislation.

1. Inconsistency with Local Strategic Planning and Zoning

The Northern Beaches Local Strategic Planning Statement – Beyond 2040 prioritises housing diversity, local character, and heritage protection. This proposal requires rezoning residential land at 64 Undercliff Road, demolishing existing housing while providing no new dwellings. Such a change conflicts with the objectives of the R2 Low Density Residential zone under the Warringah LEP 2011, which seek to preserve residential supply and neighbourhood character. It also risks creating a precedent, encouraging similar rezonings in surrounding streets and undermining zoning integrity, contrary to Ministerial Direction 3.1 – Residential Zones under the EP&A Act 1979.

2. Heritage and Character Impacts

The Harbord Hotel is a heritage-listed item under Schedule 5 of the Warringah LEP. Clause 5.10 of the LEP and Section 57 of the NSW Heritage Act 1977 require development to conserve the significance of heritage items and their settings. Inserting a multi-storey accommodation block adjacent to this landmark diminishes its historic setting and undermines statutory conservation objectives, eroding Freshwater's coastal village character.

3. Environmental and Infrastructure Concerns

The stormwater strategy proposes diversion of overland flow into Council-managed infrastructure, contrary to the Northern Beaches DCP requirement for on-site detention. This is inconsistent with Ministerial Direction 4.3 – Flood Prone Land under the EP&A Act 1979, which prohibits planning proposals that increase flood risk or transfer long-term management costs to Council and residents.

4. Traffic and Safety Impacts

The transport study identifies provision of only 31 car spaces for 37 rooms, in addition to the existing hotel, gaming, and dining uses. This shortfall contravenes the parking ratios required under the Northern Beaches DCP. Under Section 4.15 of the EP&A Act 1979, consent authorities must consider traffic generation, pedestrian safety, and cumulative impacts. Intensifying vehicle movements on Moore Road and Undercliff Road — narrow streets heavily used by beachgoers and residents — poses unacceptable risks and fails the statutory test of being in the public interest.

Conclusion

The proposal fails to satisfy the requirements of the EP&A Act 1979, the Warringah LEP 2011, the Northern Beaches DCP, and the Heritage Act 1977. It lacks strategic merit, undermines zoning integrity, and generates unacceptable heritage, environmental, and traffic impacts. On these legal and planning grounds, I urge that the proposal be refused.

Regards,



Freshwater resident

Submission Type

I am making a personal submission

Title

Miss

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Mosman

I have made a reportable political donation

No



I agree to the Privacy statement

submission

To Whom It May Concern,

I write to object to the proposed planning amendments to the Warringah LEP 2011 relating to the Harbord Hotel site, specifically the intention to facilitate the development and operation of hotel accommodation integrated with the existing Harbord Hotel and bottle shop.

While I recognise the importance of balancing development with community needs, this proposal raises significant concerns across

several areas:

1. Inconsistency with Local Character and Community Expectations

Freshwater and its surrounds have a unique village atmosphere that is highly valued by residents and visitors. The proposed expansion of hotel accommodation and intensification of pub use would alter the established character of the area, shifting it from a low-scale, community-oriented setting to one dominated by commercial tourism activity.

This is inconsistent with the strategic planning vision for Freshwater, which emphasises maintaining the suburb's residential and coastal village identity.

2. Amenity Impacts: Noise, Congestion, and Anti-Social Behaviour

The Harbord Hotel already operates as a significant licensed venue, with well-documented amenity impacts including late-night noise, crowd dispersal issues, and traffic congestion. The addition of hotel accommodation and further expansion of pub activities will exacerbate these problems:

- Noise: Increased patron numbers and extended activity hours will likely generate unacceptable noise impacts, particularly at night, affecting the sleep and wellbeing of nearby residents.
 - Congestion & Parking: Freshwater has limited street parking and narrow local roads. Additional accommodation guests and pub visitors will further strain parking availability and traffic flow.
 - Anti-Social Behaviour: Licensed premises are frequently associated with alcohol-related disturbances. Adding hotel accommodation to the same site risks intensifying these impacts and undermining community safety.
-

3. Scale and Overdevelopment of the Site

The proposal effectively seeks to rezone residentially scaled lots to permit intensified commercial use. This represents overdevelopment, introducing built form and density inconsistent with surrounding residential areas. The cumulative impact of hotel accommodation, bottle shop, and pub activities on one site is excessive for the local context.

4. Precedent and Planning Integrity

Permitting hotel accommodation and pub uses on these lots through amendment of the LEP sets a concerning precedent for ad-hoc

rezoning. Spot rezonings that serve a single landholder's commercial interest risk undermining the integrity of the Warringah LEP 2011 and eroding public confidence in the planning system. The planning framework should prioritise strategic, community-serving outcomes rather than piecemeal amendments.

5. Lack of Demonstrated Need

There is no demonstrated shortage of hotel or tourist accommodation in the Northern Beaches to justify this planning amendment. Existing facilities in Manly, Dee Why, and surrounding areas already cater to demand. The proposal appears commercially driven rather than a response to genuine community or regional need.

6. Conflict with Environmental and Social Objectives

The Northern Beaches Council Community Strategic Plan and Local Strategic Planning Statement emphasise sustainability, protection of local character, and enhancement of residential amenity. This proposal conflicts with those objectives by:

- Increasing traffic, pollution, and parking pressures.
 - Eroding the village-scale identity of Freshwater.
 - Prioritising commercial tourism over local community wellbeing.
-

7. Alternative Pathways

If the site requires revitalisation, this should be pursued through uses consistent with the existing zoning and community character – such as small-scale hospitality, arts, or community facilities – not through large-scale hotel accommodation.

Conclusion

For the reasons above, I strongly object to the proposed planning amendments to the Warringah LEP 2011 relating to the Harbord Hotel site. The proposal is inconsistent with the community's vision, would generate unacceptable amenity impacts, and represents overdevelopment that undermines the integrity of the local planning framework.

I urge Council and the Department of Planning not to support this planning proposal.

Submission Type

I am making a personal submission

Title

Miss

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Dee Why

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I am a young woman who has just moved from Queenscliff to Dee Why and although I am not a Freshwater resident, I visit weekly to support local businesses, catch up with friends, and enjoy the unique community atmosphere that Freshwater is known for and I strongly oppose the Harbord Hotel's planning proposal.

Freshwater has a long-standing reputation as a quiet, family-oriented suburb with a village feel. The proposal undermines the heritage and character of Freshwater. The rezoning shifts the focus away from community value and towards commercial expansion, prioritising business interests over the preservation of a suburb that holds historical and cultural importance.

As someone who regularly visits Freshwater and contributes to the local economy, I believe developments of this scale and type would erode the charm and liveability that make the suburb so special. My partner and I respectfully ask that this proposal be dismissed in order to protect the character, amenity, and community values of Freshwater.

Submission Type

I am making a personal submission

Title**First Name**

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I fully support this planning proposal.

We desperately need more accommodation on the Northern Beaches. Our area is in need of boutique hotel / accommodation options, dispersing accommodation from Manly. The Northern Beaches Tourism Strategy outlines this.

The Harbord Hotel ongoing improvements/upgrades have contributed to a significant lift in our areas' offering, visual appeal and vibrancy. These next developments are a natural extension for this iconic hotel. The hotel adds value, financial and other, to

Freshwater.

While the development concerns some residents in immediate streets/vicinity from a self interest point of view (valid as they do live there), this development will benefit the whole community and more broadly Northern Beaches including other local businesses.

There are mistruths circulating around the car park and stormwater.... I understand the basement car park will provide more car parking spots and should the development's stormwater engineering plans will address and manage any impacts to stormwater.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Subject: Objection to Development Application PP-2024-1593

I write to formally object to Development Application PP-2024-1593 on the following grounds:

1. Rezoning of 64 Undercliff Road – The proposal to permit pubs and hotel accommodation represents a significant departure from the established residential zoning and would create an undesirable precedent for further redevelopment of low-density residential properties, thereby eroding the existing character of the area.
2. Inconsistency with the Northern Beaches LSPS – The Northern Beaches Local Strategic Planning Statement does not identify

Freshwater as an appropriate location for additional short-term accommodation. The lack of adequate transport links and supporting infrastructure renders the proposal inconsistent with the strategic planning framework.

3. Excessive Bulk and Scale – The massing and form of the proposed development along Undercliff Road are incompatible with the prevailing built form of the locality. The visual impact would be substantial and detrimental to the existing streetscape and character.

4. Noise and Amenity Impacts – The inclusion of an elevated pool area is likely to give rise to unacceptable late-night noise impacts, adversely affecting the amenity and reasonable expectations of neighbouring residents.

5. Traffic and Parking Deficiencies – The proposed car park layout and delivery access arrangements are unsatisfactory, as confirmed by concerns raised by Council's Traffic Engineers. These deficiencies would exacerbate existing traffic and parking pressures within the locality.

For the foregoing reasons, I respectfully request that the Panel refuse the application in its current form, or alternatively, require material amendments that fully address the issues outlined above.

Regards,

[REDACTED]

[REDACTED]

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I have 2 objection:

1. Re zoning of 64 Undercliff rd:

Redeveloping of residential property & threatening our low- density character.

2. Bulk & Scale of redevelopment of Harbord Hotel..... 37 rooms makes a larger presence in this neighbourhood.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

To whom it may concern,

I am writing regarding the planning proposal for Harbord Hotel (29-31 Moore Rd and 64 Undercliff Rd, Freshwater).

I object to the proposal to amend the the WLEP to extend the permitted use of the pub and accommodation to include 64 Undercliff Road Freshwater for the following reasons;

64 Undercliff Road is zoned R2, low density residential. R2 zoning specifically protects and provides the housing needs of the

community, not short term accommodation for visitors. Removing residential dwellings during a housing crisis is in conflict with the Premier's supporting more homes and better infrastructure for the state. The Northern Beaches Council predicts an additional 35,000 residents by 2040 (Better Together Social Sustainability Strategy 2040-Northern Beaches Council). Removing dwellings is against the Sustainability Strategy.

The Harbord Hotel exists within an R2 zone, the site on 29-31 Moore Road rightly has a permitted use as a pub. The proposal to extend this permitted use to a current dwelling is a dubious way of avoiding an application for rezoning of the property at 64 Undercliff Road.

The Harbord Hotel historically had accommodation on the second floor of the existing building at 29-31 Moore Road. The operator had the opportunity to convert the second floor rooms to boutique short term accommodation within the existing footprint. However, they chose to replace the disused rooms with further entertainment space, increasing the capacity of the existing site by up to 800 patrons.

There is no evidence that short term accommodation is required in the Freshwater Basin. According to Airbtics, the occupancy rate in the Manly area and surrounding suburbs for short term accommodation is approximately 77 %, far from capacity. The need simply does not exist in Freshwater's residential basin.

The current operation of the Harbord Hotel creates daily negative impacts (rubbish, noise, constant Uber traffic on driveways) on the surrounding residents with poor response and understanding provided by the operator. Intensifying the development of the site with a 37 room hotel, pool, gym, multi storey car park will increase these negative impacts. Moore Road struggles to cope with the vehicle access as it is. Undercliff Road provides very narrow access to the current residents.

A development of this scale will inevitably lead to a considerable increase in vehicle traffic, including guest arrivals/departures, service deliveries, taxis, and potentially coach travel. This will place a strain on already limited local road infrastructure and parking availability, increasing congestion and posing safety risks to pedestrians, especially children and the elderly.

The proposal seeks a large-scale intensification of 29-31 Moore Road and 64 Undercliff Road. This will adversely impact the local character of the Freshwater Basin which is primarily residential. There are many more suitable areas on the Northern Beaches to develop hotel accommodation that offer the infrastructure and public transport required for a development of this nature, such as Manly, Dee Why and Brookvale. Locations with major access roads and bus networks that service the area.

Any amendment to the current WLEP will broaden the opportunity for future development in an area where it is not required. The WLEP provides for the housing needs of the community, the day to day needs of the residents and landscaped settings that are in harmony with the natural environment. The proposal is in conflict with all of these intentions of the WLEP.

Unsuitable Land Use in a Residential Zone. The proposal represents a significant intensification of commercial activity within a designated residential area. A 37-room hotel is effectively a medium-sized commercial development and is fundamentally incompatible with the quiet, residential character of our neighbourhood.

For all the reasons stated above, I respectfully urge the planning committee to reject this application. It is not a minor extension or improvement but a major shift in land use that will have wide-reaching negative consequences for residents and the community at large.

Sincerely,

A black rectangular box redacting the signature of the sender.

Submission Type

I am making a personal submission

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater NSW

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Dear Sir/ Madam

I wish to register our strong objections to the proposed changes to the LEP for 29-31 Moore Rd and 64 Undercliff Rd, Freshwater. Our objections are as follows.

- This change would allow the intensification of commercial use in a wholly residential area that is not in keeping with the quiet, family oriented nature of the suburb.

- The plan requires the demolition of existing residential apartments (64 Undercliff) in an area with limited rental options. With this property being absorbed into the larger commercial property, the change will be permanent and it will never return to residential use.
- Issues with storm water infrastructure were flagged in the initial council assessment and have not been addressed to allow a development of this scale to proceed. The properties in question are in close proximity to the beach and natural coastal habitats.
- The property is no where near a transport hub that will facilitate movement of patrons to and from the proposed development. There is one full-time bus route that services the suburb from Manly. A part-time bus route runs in peak hours to the Sydney CBD but is sporadic with frequent cancellation of services. This will necessitate an increase in car based traffic into a suburb with narrow and at times congested access streets.
- The current owner has demonstrated an ongoing disregard for neighbouring residents and their ability to live peacefully in their own homes. Noise levels have risen markedly with the expanded operations already in place that can be heard from inside homes with all doors and windows closed. Patrons leaving the venue are abusive to surrounding residents and have been found trespassing, urinating etc in neighbouring properties. No effort is made to control this behaviour even when stipulated in the current usage exemption for the Hotel management to take on this responsibility.
- Including a hostel/ motel and outdoor pool area in the pub operations will allow for this space to be used as part of the pub operations and will exacerbate the noise disturbance to residents. The licensing restrictions that are currently in place will no longer apply as a (nominal) safeguard for the surrounding residents.
- We are unsure as to how widely this stage of the process has been publicised. But would like to point out that there were approximately 90 submissions against the proposal when lodged with Northern Beaches council, from across the suburb, despite low level notification and no real visibility on the proposal.

For these reasons we hope you will support local Freshwater residents in resisting the intensification of commercial operations in a residential area and the over-development of a site in very close proximity to the coast with no workable plan to control stormwater run-off to our natural environment.

Kind regards

[REDACTED]

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Subject: Objection to Development Application PP-2024-1593 – Harbord Hotel and 64 Undercliff Rd

I am writing to lodge my objection to Development Application PP-2024-1593 for 29–31 Moore Road and 64 Undercliff Road, Freshwater.

Grounds for objection:

1. Rezoning of 64 Undercliff Road

Allowing pubs and hotel accommodation on a residential site sets a dangerous precedent for further acquisitions and redevelopment. This threatens the established low-density residential character of Freshwater and erodes the integrity of our local planning framework.

2. Inconsistency with the Northern Beaches LSPS

Freshwater is not identified in the LSPS as a location for additional short-term accommodation. Centres such as Dee Why and Brookvale, with transport links and infrastructure, are designated for this purpose. Freshwater lacks the infrastructure to support such development.

3. Bulk, Scale and Design

The proposed three-storey building along Undercliff Road is out of scale with the surrounding free-standing homes. A 53-metre-long wall will dominate the streetscape, permanently altering the village atmosphere and residential amenity.

4. Noise and Amenity Impacts

An elevated pool and entertainment areas will likely generate late-night noise, disrupting nearby residents. Combining pub and hotel uses in this location increases the risk of party-style behaviour rather than family or community-focused accommodation.

5. Traffic, Parking and Deliveries

The proposed car park configuration is inadequate and problematic for deliveries, as noted by Council's traffic engineers. Increased traffic and reduced parking availability will negatively impact residents.

6. Loss of Residential Housing

The proposal involves demolishing existing residential flats, further reducing local housing stock at a time when housing supply is already under pressure.

As a nearby resident, we have already experienced increased late-night noise, antisocial behaviour and younger party-oriented crowds associated with the existing pub. Adding hotel accommodation on the adjoining site will compound these issues and further diminish the residential amenity of the neighbourhood.

Conclusion

This proposal is inappropriate for Freshwater. It conflicts with strategic planning directions, undermines residential character, and creates unacceptable amenity, traffic and noise impacts. For these reasons, I respectfully request that the panel reject this application in its current form.

Kind regards,

[REDACTED]



Subject: Objection to Development Application PP-2024-1593 – Harbord Hotel and 64 Undercliff Rd

I am writing to lodge my objection to Development Application **PP-2024-1593** for 29–31 Moore Road and 64 Undercliff Road, Freshwater.

Grounds for objection:

1. Rezoning of 64 Undercliff Road

Allowing pubs and hotel accommodation on a residential site sets a dangerous precedent for further acquisitions and redevelopment. This threatens the established low-density residential character of Freshwater and erodes the integrity of our local planning framework.

2. Inconsistency with the Northern Beaches LSPS

Freshwater is not identified in the LSPS as a location for additional short-term accommodation. Centres such as Dee Why and Brookvale, with transport links and infrastructure, are designated for this purpose. Freshwater lacks the infrastructure to support such development.

3. Bulk, Scale and Design

The proposed three-storey building along Undercliff Road is out of scale with the surrounding free-standing homes. A 53-metre-long wall will dominate the streetscape, permanently altering the village atmosphere and residential amenity.

4. Noise and Amenity Impacts

An elevated pool and entertainment areas will likely generate late-night noise, disrupting nearby residents. Combining pub and hotel uses in this location increases the risk of party-style behaviour rather than family or community-focused accommodation.

5. Traffic, Parking and Deliveries

The proposed car park configuration is inadequate and problematic for deliveries, as noted by Council's traffic engineers. Increased traffic and reduced parking availability will negatively impact residents.

6. Loss of Residential Housing

The proposal involves demolishing existing residential flats, further reducing local housing stock at a time when housing supply is already under pressure.

As a nearby resident, we have already experienced increased late night noise, antisocial behaviour and younger party-oriented crowds associated with the existing pub. Adding hotel accommodation on the adjoining site will compound these issues and further diminish the residential amenity of the neighbourhood.

Conclusion

This proposal is inappropriate for Freshwater. It conflicts with strategic planning directions, undermines residential character, and creates unacceptable amenity, traffic and noise impacts. For these reasons, I respectfully request that the panel reject this application in its current form.

Kind regards,



Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Dee Why

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I object to a further application for overdevelopment at the Harbord Hotel totally surrounded by residential land and where progressive modifications further degrade the amenity. Have lived next to the Hotel for over 30 years I am well aware of the impacts that are wholly inconsistent with the residential zoning of most of the locality.

The Hotel should not be allowed to draw residential land into its pub purposes footprint and further degrade the residential amenity at the location.

I strongly object to the application and see no reason why a determining authority should go against the objectives of WLEP 2011 and allow further Pub expansion into currently residential land.

Subject: Objection to Development Application PP-2024-1593

URL: <https://www.planningportal.nsw.gov.au/ppr/under-exhibition/planning-proposal-harbord-hotel-29-31-moore-rd-and-64-undercliff-rd-freshwater>

Submission:

I have been an owner and resident at a property adjacent to Harbord Hotel for over 30 years. The impacts of the Hotel have been challenging and degraded what should normally be expected for amenity at a residential area. I moved recently to Dee Why and am grateful to be able to experience what residential amenity can offer without a Hotel. I can now get undisturbed sleep, something that was uncommon living next to Harbord Hotel. The Hotel's continual drive to intensify activities is totally out of keeping with maintaining protection for residential amenity and draining on neighbours.

I am writing to lodge an objection to Development Application **PP-2024-1593** for the following reasons:

1. **Rezoning of 64 Undercliff Road (Lot 6 Section 1 DP7022)** – Allowing pubs and hotel accommodation sets a precedent for further redevelopment of residential properties, threatening the low-density character of the area.

The Hotel's application seeks to continue its intensification of its Pub activities (series of applications 2020-2025). This current application intends to draw in land where current zoning excludes Pub activities. The WLEP 2011 (Zoning) is quite specific and with good reason to protect residential amenity. There is no valid reason for further intensification of the pub activities, which is just extension of its footprint while consuming residential land.

The pub is already able to develop accommodation on its existing footprint (subject to consent). The only reason it now seeks residential land is to maximise its profit without any regard for the local residential community and taking away much needed rental accommodation. The Hotel has already removed accommodation from the existing building to incorporate more swill areas and substantially increase patron numbers with further impacts on the residential community. Residents should not need to be further impacted.

The Hotel's original application for increasing floors said it would only be an additional 50 patrons but the reality has seen hundreds more – The assessments by Boston Forsyth Fleming lack credibility and should not be relied on. The Hotel has misled the community and authorities in the past as to its intent and does not deserve the support for this excessive overdevelopment of the Hotel Property in this very close residential area.

If considering approval, the determining authority should explain why it would turn back the provisions of the WLEP 2011 in respect of Residential Zoned

land. It does nothing for the surrounding residential land and in fact degrades it which is contrary to the objectives of WLEP 2011.

The effective cancelling of the residential zone status should not be approved.

2. **Inconsistency with the Northern Beaches LSPS** – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure.

Already the locality is under great pressure with limited road access and periods of gridlock at times. At peak beach times people from the wider district head to beach but access to the beach area and suburb gets progressively more difficult. Intensifying overdevelopment at this site can only further exacerbate existing problems.

3. **Bulk and Scale** – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity.

The proposed building is contrary to the Hotel's Heritage building form, is excessive in bulk and will draw more people to a very small location which can only degrade access and create more disturbance

4. **Noise and Amenity** – The elevated pool area is likely to generate late-night noise, impacting neighbouring properties.

A range of aspects for the Pubs application will lead to greater disturbance and degradation of the residential amenity which is contrary to WLEP 2011 objectives. The Application should be rejected.

5. **Traffic and Parking** – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers.

The area is between the beach and shops, often with considerable pedestrian movements. It is not suited to further intensification. Southern end of Charles Street and Undercliff Road are already overstretched and the location for such a proposal is ridiculous and is just the dream of an over-aggressive developer intent only on personal benefit and no regard for local community.

For the above reasons, I respectfully request that the panel reject this application (particularly ensuring no change to residential zoning for 64 Undercliffe Road) and, request the applicant to significantly amend its plans for the locality to more closely address protection of residential amenity for the locality.

Appendix A – Zone R2 Low Density Residential (Warringah LEP 2011)

Zone R2 Low Density Residential

1 Objectives of zone

- To provide for the housing needs of the community within a low density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To ensure that low density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah.

2 Permitted without consent

Home-based child care; Home occupations

3 Permitted with consent

Bed and breakfast accommodation; Boat sheds; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dwelling houses; Educational establishments; Emergency services facilities; Environmental protection works; Exhibition homes; Group homes; Health consulting rooms; Home businesses; Hospitals; Oyster aquaculture; Places of public worship; Pond-based aquaculture; Recreation areas; Respite day care centres; Roads; Secondary dwellings; Tank-based aquaculture; Veterinary hospitals

4 Prohibited

Any development not specified in item 2 or 3 – “Does not allow for purposes of pubs”

Appendix B - Pub exists only because of a cut out in the WLEP 2011 for additional uses

14 Use of certain land at 29 Moore Road, Freshwater

- (1) This clause applies to land at 29 Moore Road, Freshwater, being Lots 1–5, Section 1, DP 7022 and Lot 13, Section 1, DP 7022, shown as “Area 14” on the *Additional Permitted Uses Map*.
- (2) Development for the purposes of pubs is permitted with consent.

Extending to 64 Undercliffe is contrary to WLEP 2011 and should not be supported

Why would a determining authority seek to remove or downgrade residential amenity? Has protection of residential amenity now been made subservient the needs of greedy developers to squeeze every last opportunistic dollar out of the hotel land and adjacent residential land

Will government sanction that? If so, residents could well view approval to be by an uncaring government allowing itself to be driven by greedy developers for non-essential expansion of an already overdeveloped property. Residential areas need protection.

Kind regards,

[Redacted signature block]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Subject: Objection to Development Application PP-2024-1593 – Harbord Hotel and 64 Undercliff Rd

I object to Development Application PP-2024-1593 for 29–31 Moore Road and 64 Undercliff Road, Freshwater.

The rezoning of 64 Undercliff Rd to allow pubs and hotel accommodation is inconsistent with the Northern Beaches LSPS and sets a precedent that threatens the low-density residential character of Freshwater. The proposed bulk and scale on Undercliff Rd is completely out of character with the surrounding homes and will dominate the streetscape.

As a local resident, I have already experienced noise and disruption from the hotel. Adding a pool and hotel accommodation will further increase late-night noise and party behaviour, reducing residential amenity. The traffic, parking and delivery arrangements are also inadequate, and the demolition of existing flats will reduce housing availability.

Over recent years, the Harbord Hotel has shifted from a quiet local venue to one attracting a younger, more party-oriented crowd. This has already resulted in late-night noise, parking congestion, litter, and antisocial behaviour. Existing noise from the pub and staff activity late at night further compounds the issue. The addition of a hotel and pool will only amplify these impacts, further eroding residential amenity.

For these reasons, I respectfully request that the proposal be rejected.

Kind regards,

[REDACTED]

[REDACTED]

Subject: Objection to Development Application PP-2024-1593 – Harbord Hotel and 64 Undercliff Rd

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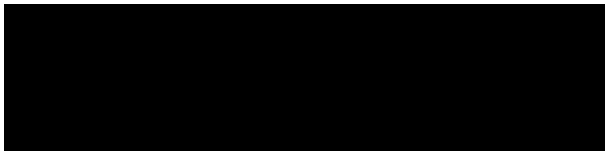
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Email

[REDACTED]

Suburb/ Town

[REDACTED]

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

[REDACTED]

August 18, 2025

Submission – Objection to Planning Proposal PP-2024-1593 – Harbord Hotel (29–31 Moore Road & 64 Undercliff Road, Freshwater)

To the Department of Planning, Housing and Infrastructure,

We object to Planning Proposal PP-2024-1593, which seeks to amend the Warringah Local Environmental Plan 2011 to allow hotel accommodation at the Harbord Hotel site.

This is effectively the same proposal rejected by Northern Beaches Council in October 2024 after overwhelming community opposition. The revised version does not resolve the fundamental issues. Approving it would undermine the integrity of the R2 Low Density Residential zone and the wellbeing of local residents.

1. Inconsistent with R2 zoning

- Under WLEP 2011, hotel use is prohibited in R2 Low Density Residential.
- The objectives of R2 are to preserve low-scale housing, protect quiet enjoyment, and maintain landscaped character. A three-level, 16-room hotel directly contradicts these aims.
- Families living opposite will see their privacy and sense of safety replaced by a constant rotation of strangers, with bedrooms facing directly into hotel rooms. This is profoundly unsettling for residents raising children, as we are attempting to directly across from the car park today, fortunately shielded for now by trees and nature.

2. Bulk, height and setbacks

- The proposal exceeds the 33.3% footprint limit and ignores required 6.5m setbacks.
- The concept drawings reveal a monolithic, modernist block that overwhelms our own and three of our neighbours' residential lots.
- This bulk is entirely out of place in Freshwater's beachside streetscape, which is characterised by modest homes, landscaped setbacks and a healthy array of mature trees and gardens

3. Heritage and view corridors

- The Harbord Hotel is a valued heritage building. Its rear elevations and rooflines are part of the local identity of Undercliff Road.
- The proposed new block would erase heritage views and replace them with blank walls and hotel room balconies with guests gazing across at our home and bedrooms as they party through the night.
- If accommodation is justified historically, it should be incorporated within the heritage structure, not via a new and visually dominant building.

4. Amenity, noise and privacy impacts

- Co-locating a hotel with a large, licensed pub guarantees noise, late-night disturbance and anti-social behaviour.
- This is not the same as a stand-alone hotel attracting families or visiting relatives; instead, it will draw party-oriented guests spilling out at night.
- 37 rooms and an unknown number of occupants plus their vehicles mean more traffic, air-conditioning and exhaust plant noise, already a problem and increased with recent renovations.
- Common areas lit with full-height glass will shine into neighbouring homes, including our own, destroying privacy and degrading sleep.
- For families across the road, including those with children, the sense of security and peace will be lost permanently, this is perhaps

our most feared impact.

5. Environmental impacts

- The cliff and overgrown land behind Undercliff Road provide habitat for bandicoots and possums, which are regularly sighted, including in the nature area between the existing car park and Undercliff Road.
- Excavation, lighting, and loss of green space will irreversibly destroy this habitat. No credible biodiversity assessment, nor conversation solutions have been provided.

6. Traffic and parking

- Freshwater already suffers congestion and limited parking capacity.
- 37 parking spaces are planned, however the pub provides 20 today and another 5 at #64 before bottle shop parking is considered means there are 10-12 new spots for the 37 new hotel rooms. The proposal includes no credible traffic or parking strategy, rather it will exacerbate both the parking and traffic problems Freshwater already faces today.
- Adding hotel guests on top of existing pub patrons is unsafe and unsustainable.

7. Precedent and loss of housing

- Allowing a hotel in R2 sets a dangerous precedent that could encourage further commercial overdevelopment in residential areas.
- The demolition of an existing small flat building removes local housing at a time of shortage, prioritising commercial profit over community needs.

8. Community impact

This is not simply a matter of planning controls. It is about the quality of life of those who live opposite and nearby. Families who have chosen Freshwater for its village feel and residential character will be forced to live across the road from a 24-hour tourist facility bolted onto a pub.

Instead of knowing and trusting their neighbours, residents will face a steady churn of strangers, noise at all hours, cars searching for parking, blocking driveways and loss of privacy in their own bedrooms. The mental stress, lack of sleep, and constant vigilance this will create is not a fair burden for the community to bear.

Conclusion

The planning proposal remains inconsistent with zoning controls, incompatible with heritage values, destructive of environmental habitat, and profoundly damaging to residential amenity.

The issues are not minor details to be worked out at DA stage — they are fundamental flaws that cannot be reconciled with the R2 zone. That is why Council rejected this proposal in 2024, and why the Department should also reject it now.

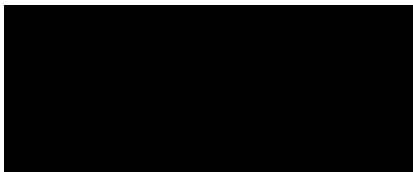
We strongly urge the Department of Planning, Housing and Infrastructure to refuse Planning Proposal PP-2024-1593.

Yours sincerely,

[Redacted Signature]



18th August 2025.



August 18, 2025

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We strongly urge the Department of Planning, Housing and Infrastructure to refuse Planning Proposal PP-2024-1593.

Yours sincerely,

[REDACTED]
[REDACTED]

18th August 2025.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

From [REDACTED], 18th August 2025

[REDACTED]

Dear Sir/Madam,

I am writing as a long-term resident, living nearby Harbord Beach Hotel to oppose the planning proposal 2024-1593.

I oppose the re-zoning of residential land to commercial purposes in a R2 low-density residential area. The inclusion of 64 Undercliff

Rd in the development would result in the demolition of an existing block of units and the displacement of at least 3 families. The shortage of long-term housing is the greatest issue facing NSW and the removal of housing of 64 Undercliff Rd is contrary to Warringah planning zone aimed at preserving and increasing residential density to address the current housing crisis.

Why isn't the site suitable, here are some potential issues:

1. Freshwater is not a transport hub, according to the "Transport Aspects of Planning Proposal for Accommodation Building at Harbord Beach Hotel" release in September 2023 by Colston Bud Rogers Kafes Pty Ltd which listed three buses servicing the area - one being during a limited early morning and late evening run catering for city workers. The other, a school bus route 2.2 km from / to Freshwater. Currently, there are no future developments for increased transportation in the pipeline.

2. The impact of the traffic flow intensification caused by previous authorised developments has increased greatly with the now allowed 750 patrons on a given day and greater numbers on event days. This has resulted in the degradation of residential amenity not only from the traffic flow itself but by anti social behaviour of patrons existing hotel. Adding a motel/accommodation facility to the current site will further impact the traffic flow and increased noise in the surrounding residential area.

In summary, the current proposal of re-zoning of residential land should not be granted approval. I respectfully request that this statement, along with supporting documentation provided in earlier submissions by other residents be given full consideration as part of the investigation and resolution process.

Kind regards,



From [REDACTED]
[REDACTED]
[REDACTED]

Sydney, 18th August 2025

Dear Sir/Madam,

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Kind regards,
[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am writing to object to PLANNING PROPOSAL PP-2024-1593

The proposal – if accepted – would lead to the further intensification of commercial uses across R2 zoned sites in a quiet residential neighbourhood.

Building a large-scale motel and pool complex attached to the ever-expanding pub is not in the interests of our local community (which is why there were more than 80 objections from residents across Freshwater in the Council process last year, and why Council voted

to reject the proposal). Such a development would result in additional traffic (in an area poorly served by public transport) and further exacerbate the issues residents are already experiencing as a result of the past expansions of licensed premises, in terms of late-night noise levels and anti-social behaviour.

The proposal is for a very large (37 room) & very bulky building which are out of keeping with the surrounds. We understand that this new build would be adjacent to the pub but outside the license restrictions which give residents some level of protection from late night noise.

This proposal is not aligned to the relevant government/policy frameworks including the North District Plan, Local Strategic Planning Statement (LSPS) and the Northern Beaches Local Housing Strategy (NBHS), all of which reinforce priorities for the promotion of liveable cities, housing growth and housing diversity [see attached submission].

At a time when all levels of government should be prioritizing measures to address the critical shortage of affordable housing in Sydney, this proposal would see one of the few affordable rental buildings in the area (#64 Undercliff) being re-zoned, knocked down and replaced with short-stay motel accommodation. And with the new build encroaching on the low-rise building next door.

And this would be an instance of State Government using its powers to facilitate the further super-sizing of an integrated 'pubs and clubs' style development, over the objections of residents and the determination by Council. That feels like an astonishing path to take, given the headlines over the past 12-months and relating to some of the larger groups in this sector.



14 January 2025

Department of Planning, Housing and Infrastructure
Locked Bag 5022,
Parramatta NSW 2124

CC: Sydney North Planning Panel

RE: SUBMISSION LETTER TO PLANNING PROPOSAL
PREMISES: 29-31 MOORE ROAD (HARBOURD HOTEL) AND 64 UNDERCLIFFE ROAD FRESHWATER
COUNCIL REF: PEX2024/0005
DPHI REF: RR-2024-34

1. Introduction

This submission letter has been prepared by Paro Consulting on behalf of 21 landowners in relation to the planning proposal seeking to amend permissible uses at 29-31 Moore Road (Harbord Hotel) and 64 Undercliff Road, Freshwater.

The purpose of this submission is to outline key points of objections for the Department of Planning, Housing and Infrastructure (DPHI's) and the Sydney North Planning Panel's consideration during the upcoming assessment of the Planning Proposal under the rezoning review process.

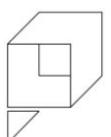
A significant number of residents and landowners strongly oppose the expansion of the pub operations, and the introduction of hotel and motel use in this locality, with 96 submissions received by Council during the initial public consultation phase. A summary of key considerations is provided below.

2. Background

The Planning Proposal seeks to amend the Warringah Local Environmental Plan 2011 to permit 'hotel or motel accommodation' as an additional use and to extend the existing permitted use of 'pubs' to 64 Undercliff Road, a residential flat building consisting of three apartments. The intended outcome is to facilitate the development of an expanded pub and to introduce a 37-room hotel. Concept plans also include a basement carpark.

An overview of the planning proposal assessment to date is provided below.

- Planning Proposal lodged with Council in July 2024.
- Council facilitated the public exhibition of the proposal during August and September 2024 with a total of 96 submissions received.
- The Northern Beaches Local Planning Panel considered the proposal at its meeting held on 16 October 2024. The Panel recommended that Council progress the planning proposal with some amendments; including the need to prepare a site-specific Development Control Plan (DCP), and to allow expanded pub and hotel uses across the proposed basement.



- At its meeting held on 12 November 2024, Council resolved against progressing the planning proposal.
- On 18 November 2024, the proponent lodged a Rezoning Review with the DPHI.

3. Matters for consideration

This section outlines key issues for consideration by the DPHI's North District planning team and the Sydney North Planning Panel as part of its assessment under the rezoning review process. A future submission will be provided should the Planning Proposal be the subject of community consultation following a Gateway Determination.

3.1. Strategic and site-specific merit

The planning proposal is considered inconsistent with the DPHI Local Environmental Plan Making Guideline December 2021 as it does not adequately demonstrate strategic and site-specific merit per the criteria stipulated in the DPHI Local Environmental Plan Making Guideline.

An assessment against key priorities is outlined below.

3.1.1 Strategic Merit

The proposal does not align with the NSW strategic planning framework including the North District Plan, Local Strategic Planning Statement (LSPS) and the Northern Beaches Local Housing Strategy (NBHS). These plans consistently reinforce priorities for the promotion of liveable cities, housing growth and housing diversity.

- The Northern Beaches Council has a minimum 5-year housing target of 3,500 new dwellings which has been set by the DPHI. However, the Department of Planning projects only 1,650 new dwellings will be delivered over the next 5 years resulting in a significant short fall of 1,835 dwelling for the LGA (52% shortfall). The proposal and results in the loss of three rental apartments (consisting of being two three bedroom and a one-bedroom dwellings) to accommodate short term tourist accommodation. The proposal is at odds with the following key strategic priorities.

LSPS key priorities

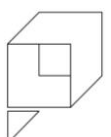
- *Priority 17 Centres and neighbourhood designed to reflect local character*
- *Priority 18 Protect, conserve and celebrate heritage*

NBHS key priorities

- *Priority 1: Housing target - meet District Plan and 6-10 year housing target, and*
- *Priority 3: Social and affordable housing - encourage more affordable housing.*

The proposed LEP amendment will further exacerbate the housing target shortfall in the LGA and exacerbate the shortage of this housing type.

The proposal is also at odds with sound strategic planning principle of co-locating commercial and service-based uses in commercial zones and activity centres. Hotel and pub land uses are permissible in the *E1 Local Centre*, *E2 Commercial Centre* and *E3 Productivity Support* land use zones. These centres are expected to be developed for intensive land uses and as such, are supported by strategic government investment in public transport infrastructure and public domain improvements including pedestrian connectivity. The subject property is not located in an accessible area. The proposed uses are inconsistent with the strategic intent of the residential zone, and are contrary to the expectation of future character.



3.2.2 Site Specific merit

The proposal is considered to exceed the capacity of the site and will result in unavoidable impacts upon the local environment. Key matters for consideration include the following matters.

- The intensification and scale of the proposal exceeds what is deemed appropriate for the site. The built form to be facilitated under the planning proposal appears excessive in floor area, site coverage and scale in the context of the future desired character.
- The proposal will inevitably increase visitation to the site and likely increase the noise nuisance (which currently impacts nearby residences) and traffic volumes. It is unlikely that adequate mitigation measures can be effectively implemented and maintained in perpetuity considering that venue operators have not been able to adequately manage the noise nuisance and patron behaviour on many occasions.
- The incorporation of 64 Undercliffe Road into the development site is likely to increase impacts upon the locality considering that the existing built form at that property provides a buffer between the licensed premises and adjoining residential dwellings.
- The proposal has not adequately demonstrated consistency with Appendix 1 of the NSW Coastal Design Guidelines 2023, including the requirement that foreseeable impacts of stormwater upon the coastal environment are considered at the planning proposal stage rather than being deferred to the Development Application assessment per the approach for this proposal. Specifically, A.1h of Appendix 1 required a planning proposal to *“Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater”*.

Further, it is unlikely that Council staff had adequate time to assess the proposal against the Guidelines considering that additional information was provided the day before Council’s meeting held 12 November 2024.

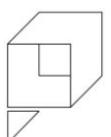
- The local road network is not designed to cater for high traffic volumes, noting that primary site access provided by Charles Street is built with a steep gradient impacting site lines and therefore safe vehicle egress from the property. The local roads are also built with narrow carriageways impacting safe manoeuvring of local traffic.

3.2. Wastewater and stormwater

The following matters must be resolved prior to progressing the Planning Proposal as they are likely to impact the development footprint and long-term operation of utility infrastructure.

- The unresolved impacts of the proposal on Council’s stormwater infrastructure and the Sydney Water sewer line through the property have a material impact upon any future basement capacity. This may result in a reduction of parking provided on-site or result in additional at grade parking impacting the location of built form.
- The impact upon the coastal environment has not been substantiated per the requirements of the NSW Coastal Design Guidelines 2023 (refer to Part 2.2 *Site specific merit* contained within this letter).
- The proposed stormwater modelling should consider overland flow and velocity above the 1% AEP and include climate change assumptions.
- The cost to Council for the ongoing maintenance of the reconfigured stormwater is unsubstantiated.

The design, ongoing performance and maintenance of stormwater and wastewater infrastructure must be resolved prior to DPHI’s providing its assessment report to the Sydney North Planning Panel.



4. Recommendations

The planning proposal should not be supported based on the key issues summarised below:

- The Planning Proposal does not adequately demonstrate strategic or site-specific merit and is therefore considered inconsistent with the DPIE Local Environmental Plan Making Guideline December 2021.
- The proposal removes housing supply in an area which has limited capacity for additional housing supply and diversity and Council are currently include a 52% shortfall of the required 5-year housing target set by DPHI.
- The proposal is inconsistent with the character of the residential neighbourhood and is inappropriate within the context of its immediate locality.
- The existing amenity impacts associated with the operation of the pub are likely to be exacerbated while the introduction of a hotel/motel will increase visitation and associated externalities relating to traffic safety.
- The management of water and sewer infrastructure has not adequately been resolved.
- Proper process has not been followed as the proposal has not adequately demonstrated consistency with Appendix 1 of the NSW Coastal Design Guidelines 2023.

5. Conclusion

The Planning Proposal facilitates development that will result in unacceptable amenity impacts. The proposal is at odds with character of the locality and key principles set out in strategic land use policy.

The design and ongoing management of stormwater infrastructure as well impacts upon the coastal environment have not been appropriately addressed.

The planning proposal should not be supported. We look forward to working with the DPHI and Sydney North Regional Panel to ensure that the appropriate consideration is given to residents and the broader community.

Feel free to contact me on 0422 983 710 or at daniel@paroconsulting.com.au should you wish to discuss the context of this letter and to arrange an opportunity to represent the landowners at an upcoming meeting.

Kind regards,

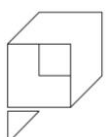
[Redacted Signature]

[Redacted Name]

[Redacted Title]

[Redacted Address Line 1]

[Redacted Address Line 2]



Submission Type

I am submitting on behalf of my organisation

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

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Email

[REDACTED]

Suburb/ Town

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Please note: This submission duplicates a submission made last week through an attached file, and is provided to ensure that the content is accepted. Thank you

[REDACTED]

Co-Chair, Friends of Freshwater

Planning Proposal (29-31 Moore Rd & 64 Undercliff Rd, Freshwater)

PEX2024/0005 - Harbord Hotel

Submission from Friends of Freshwater

Thank you for the opportunity to provide comments on this Planning Proposal.

As the Proposal allows only for the rezoning of this particular site, and does not approve the design and scope of the proposed development, Friends of Freshwater is prepared to Support the Planning Proposal if the following conditions are noted or imposed:

- The historic nature of this particular site is recognised and it is stipulated that this decision does not set a precedent for other R2 Residential areas in the Freshwater Basin to be rezoned for similar purposes;
- A condition is imposed on the developer to undertake community forums to better explain the proposal, address community concerns and potentially modify its proposal before a formal Development Application (DA) process commences; and
- A formal DA process to approve modifications to the site and construction of hotel accommodation is undertaken.

Statement of our understanding of this Planning Proposal

We note that the planning proposal seeks to amend the Warringah Local Environmental Plan 2011 to facilitate construction of a three-storey hotel comprising approximately 37 hotel rooms, reception/lobby, guest lounge, gym and swimming pool on the southern portion of the site together with basement carparking for 72 cars. This will be integrated and managed in association with the existing 'Harbord Hotel' and bottle shop.

The amendment to the LEP essentially seeks to:

- increase the size of an existing Additional Permitted Use (APU) for pubs which applies to 29-31 Moore Road by incorporating 64 Undercliff Rd into the site; and
- allow hotel accommodation on the larger site as part of the amended APU even though the site is within an area currently designated as R2 Residential

We see that this planning proposal is accompanied by preliminary architectural drawings and other documentation to demonstrate key aspects of the development and its impact on the local area. We also note that if the Planning Proposal and amended APU are accepted there will be a full and transparent development application process run by the Northern Beaches Council so that the community is able to view and comment on final architectural drawings and plans governing the development.

As such we understand that approval under this Planning Proposal provides a framework under which the development can potentially proceed but does not provide approval for the final design or scale of the development.

Our comments on the Proposal

We note that Friends of Freshwater made a submission on the original Harbord Hotel Rezoning proposal in September 2024.

In that submission we noted that for many years, the Harbord Hotel had accommodation for up to 15 rooms at the upper level of the hotel, although in recent decades this was seldom made available. That accommodation was repurposed by the Hotel as part of the approved Stage 2 of the redevelopment and is no longer present. Nonetheless there is a precedent for hotel accommodation on the site.

We also note that at the current time there is no significant facility providing short-term accommodation in the Freshwater Basin (Basin). Anecdotally we believe that there is significant demand for such accommodation. We believe it would be a boon for local businesses which often struggle with seasonal visitation to the Basin. The potential economic benefit in terms of turnover for local businesses and jobs is further supported by Annexure 7 – Economic Impact Assessment.

We believe that many aspects of the development have been well thought through. Additional parking spaces, improved loading facilities, and height constraints maintained within the 8.5 metre requirement are all welcome and suggest the development has positive potential. However, these issues must be weighed against other factors and potential impacts on the community.

We note that there has been significant opposition to this proposal from the community in Freshwater. This has come from both those immediately impacted by the development, and others worried about the precedent that may be set by allowing the rezoning of this site within an R2 Residential zone in Freshwater.

It is our view that community engagement on the original DA proposal was lacking by both Council and the developer. Council only contacted a small group of local residents immediately impacted by the development, whereas this is a proposal that affects a much broader area. We acknowledge and commend the fact that Friends of Freshwater was contacted and invited to attend an exclusive information session by the developer. However, to our knowledge, no broader community engagement was undertaken. Not surprisingly the community lodged many objections to that proposal.

While this current round of consultation provides additional avenues for the community to express its views, we see little evidence of modification of current plans to incorporate the feedback from the earlier round of public consultation. If the community is to have faith in these processes we would expect to see some genuine modification of plans to incorporate community views.

Therefore, while in principle we support the concept of this development, if a final DA were to be submitted in line with the current documentation there would be a number of issues of significant concern.

- a) The number of rooms proposed seems excessive and the concept plans show most of the land being used. It would be more in line with the community if there was some open space included and fewer rooms.
- b) The noise component from a roof-top swimming pool would impact neighbours as outdoor 'pool entertainment' would be bound to occur
- c) The absorption of 64 Undercliff will reduce affordable housing in the neighbourhood and is not part of the current Hotel footprint
- d) There will inevitably be additional road traffic from both guests and hotel services around an already crowded area in Freshwater. This needs to be specifically addressed

- e) While the Hotel is on bus transport routes these services are limited, particularly in the evening. Additional evening services may need to be considered
- f) There should be a taxi/Uber pick up and drop-off included in the plans
- g) We are concerned that there may not be adequate access provided for people with limited mobility or disability, particularly given the steep nature of the road along Charles Street. Disabled access into the hotel via lifts or ramps from both the street and car park needs to be included, as well as disabled access between floors in the dining, entertainment and accommodation areas.
- h) We also note that the current footpath along Undercliff Road on the south of the site is not paved and is in poor condition. A significant improvement in the footpath both adjacent to the site and along Undercliff Road as it progresses eastward towards the beach is required
- i) The recently completed Stage 2 development has added a live music venue and music recording studio to the Hotel. We have not yet seen any reports on the impact of noise, road traffic or foot-traffic from these developments. A final DA must address the impact of the full Stage 2 and Stage 3 developments on these issues
- j) We welcome that the current design appears to stay within the 8.5 metre height restriction. It is essential that the 8.5m limit is retained. Almost every house along Undercliff Road is set back from its frontage and thus the 8.5 limit starts further back on the downslope of the block, reducing the visual impact from street level. We trust a similar setback will apply here.
- k) Further to these height concerns, the bulky nature of the development seems to be inconsistent with and overpower the adjacent heritage building. Design modifications should be considered to lessen this stark contrast.

In relation to the last point, the current NSW government appears to be seeking to increase height limits in many locations. As such, rezoning this site has the potential to open a Pandora's box and lead to further development 'creep'. We therefore reiterate the importance of maintaining an 8.5 metre height limit and appropriate setback from the street for this development, regardless of any potential changes in Government policy or regulation.

For the reasons above, Friends of Freshwater remains concerned about the scope of this development and its impact on the local community. As such potential approval of this Planning Proposal must be recognised as only a first step in a process of broader community consultation, consideration of modifications and submission through a formal Development Application process. It must also be recognised that there are specific historic issues that apply to this site and that the approval of rezoning at this site is not a precedent for broader application in the Freshwater Basin.

Consequently, Friends of Freshwater is willing to support this Planning Proposal only if the conditions outlined at the front of this submission are noted and imposed to the fullest extent possible.

Submission Type

I am making a personal submission

Title

Miss

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

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Email

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Suburb/ Town

Freshwater

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Submission Opposing Planning Proposal PP-2024-1593

Subject: Exhibition of Planning Proposal – Harbord Hotel, Freshwater

To Whom It May Concern,

I am writing to formally oppose the planning proposal seeking to permit “pubs” and “hotel accommodation” as Additional Permitted Uses at 29–31 Moore Road and 64 Undercliff Road, Freshwater.

1. Inappropriate Conversion of Residential Dwellings

The subject site includes existing residential dwellings. Converting these properties to commercial use undermines the intent of the residential zoning. Residential areas should remain primarily for housing, not for commercial expansion. Allowing a precedent of converting homes into commercial hotel use risks destabilising the planning integrity of Freshwater and encouraging further erosion of residential amenity.

2. Adverse Impact on Neighbourhood Character and Amenity

Freshwater is a suburb with a strong residential character and community feel. Introducing expanded hotel accommodation and additional pub use will alter the fabric and energy of the neighbourhood. This proposal will increase noise, traffic, and late-night activity in a residential street that is not designed for such intensity. Such impacts are inconsistent with the quiet enjoyment expected in a suburban residential area.

3. Traffic, Parking, and Safety Concerns

The narrow local streets surrounding Moore Road and Undercliff Road are already under pressure from residents and visitors to Freshwater Beach. Adding a commercial hotel component will inevitably increase parking demand, congestion, and pedestrian safety risks. No clear plan has been presented to adequately mitigate these impacts.

4. Precedent for Overdevelopment

Approval of this planning proposal would set a precedent for further commercial encroachment into residential areas. This would threaten the broader planning vision for Freshwater as a residential suburb with carefully balanced village-style commercial activity limited to appropriate zones.

5. Community Expectations and Energy of the Suburb

Freshwater’s appeal lies in its coastal, village-like atmosphere. Residents value its balance of lifestyle, family-oriented living, and small-scale business areas. Expanding a large-scale commercial hotel use into residentially zoned land disrupts this balance and changes the “energy” of the suburb in ways that cannot be undone.

Conclusion

For the reasons outlined above - loss of residential dwellings, negative impacts on neighbourhood character and amenity, increased traffic and safety concerns, risk of setting an undesirable planning precedent, and erosion of Freshwater’s community identity - I

strongly oppose this planning proposal.

I respectfully request that the proposal not proceed and that the subject sites remain for residential use in line with the intended planning controls.

Kindly,

[REDACTED]

[REDACTED]

[REDACTED]

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



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Email

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Suburb/ Town

Freshwater

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submission

Objection to planning proposal to rezone residential block as attached pdf file

15 August, 2025

Louise McMahon
Director Planning Proposal Authority
NSW Department of Planning, Housing and Infrastructure

Dear Louise

RE: Objection Planning Proposal (PP-2024-1593) - 29-31 MOORE Rd & 64 Undercliff Rd, FRESHWATER

Thank you for your notification relating to the exhibition of planning proposal for 29-31 Moore Rd & 64 Undercliff Rd, Freshwater.

As per our previous submissions to the development applications for the hotel we object to this Planning Proposal to revise the Warringah LEP 2011 at 29-31 Moore Road and 64 Undercliff Road, Freshwater to further develop the Harbord Hotel (the Hotel) site.

The existing use and renovations have already increased the impact to nearby residences, including ourselves who are immediately adjacent to the bottle-shop on the eastern side of the site. This has included recent completion of the upgrade to level 1 (previously accommodation 15 rooms) and subsequent increase in capacity numbers to more than 50% of original patronage and increase in live entertainment and a recording studio.

We therefore submit our objection to the proposal on the following grounds:

1. **Rezoning of 64 Undercliff Road** – Allowing pubs and hotel accommodation sets a precedent for further redevelopment of residential properties/adjacent to commercial properties, threatening the low-density character of the area.
There is also concern relating to the loss of 3 affordable rentals already at a premium in the area and much needed to supply adequate workforce.
There is a growing number of developments in the area (including 35 Moore Rd) converting low end rentals to premium apartments reducing the capacity of affordable rentals.
2. **Noise and Amenity** – Further amenity impacts to nearby residences and streetscape beyond what is already being experienced as a result of the development and increase in capacity numbers. The elevated pool area is likely to generate late-night noise, impacting neighbouring properties.
64 Undercliff Rd and the adjacent car park of the Hotel directly look into our property including bedrooms/bathrooms. An increase from current 3 apartments and carpark to 37 hotel rooms (including balconies) and elevated pool entertaining area would further invade privacy and noise issues on top of the existing hotel addition to Level 1 entertainment area and balcony that also overlooks our property.
3. **Traffic and Parking** – The proposed car park configuration and delivery access raise concerns, as noted by Council Traffic Engineers.

Parking is already critical in the area and this can be seen in the photos in all of the reports submitted that the adjacent streets are already at capacity. During summer months this is also heightened.

I am concerned the traffic and transport report notes bus services that will not assist the proposed patrons/employees of the hotel – ie 165X service operates for peak hour for services to and from the city and a service to Freshwater High school.

There is also discrepancy in the transport report and the economic report. With the transport report detailing only 2 additional car parks are required for staff for the proposed accommodation based on 4 employees, this seems very low for a 37-room hotel needing housekeeping, food and beverage, front office, pool/gym and management. The economic report reports much higher employment outcomes.

During summer and weekend, it is difficult for our families to back out of our adjacent driveway into Moore Rd across the pathway leading to the beach/park area. I would think the increase in traffic from the proposed exit from the hotel/pub of 72 car parks would significantly increase this impact.

The Hotel has not made good car parking conditions relating to the DA approval for the extension and increase capacity for use of Level 1 as entertainment and recording studio which is now operational. This was to increase car parking from 23 to 31 car parking spaces.

4. **Inconsistency with the Northern Beaches LSPS** – Freshwater is not identified as a location for additional short-term accommodation due to its lack of transport and infrastructure. There is already a number of accommodation facilities in commercial areas such as Manly, Brookvale, Newport and Palm Beach and scope to increase this along the transport corridor/commercial zones. A Motel in Dee Why was altered to units indicating the lack of need for accommodation and more need for rentals alongwith NSW Housing targets.

The economic report highlights the economic benefit to the owner of the hotel to increase late night entertainment rather than cultural benefits to the community and residents in a LR2 zone. Noting the permitted use of the Hotel in a LR2 zone is to cater for the community as a local friendly hotel, not a major entertainment venue.

5. **Bulk and Scale** – The proposed building along Undercliff Road is out of character with the surrounding streetscape and would significantly alter the visual amenity and impact the Heritage value of the existing Hotel.

6. **Degradation of heritage values and local character**

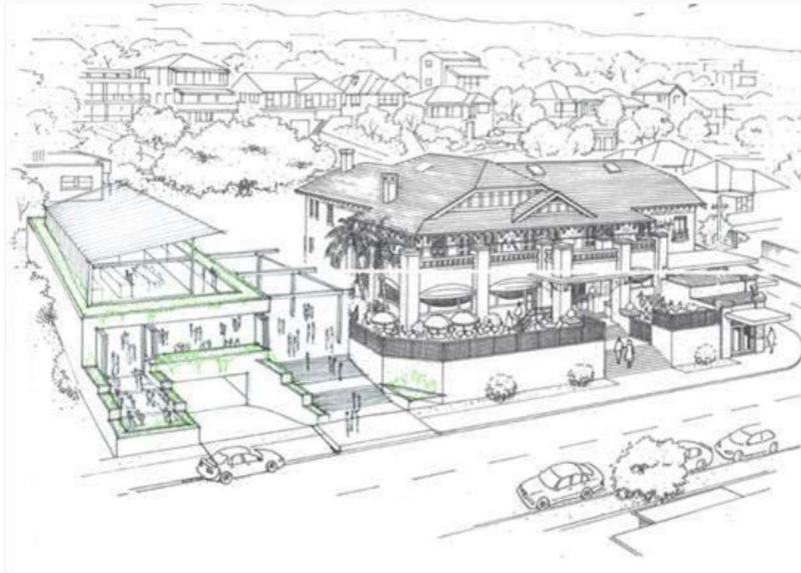
This Planning proposal does not factor in the integrity of the surrounding community's residential amenity and well-being. The proposal to alter residential property to incorporate into hotel accommodation is not consistent with the character of the area and doesn't comply with this area is zoned residential R2. The current licence for the hotel is a historic exemption of this zoning. This Planning Proposal would amend the LEP in a way that would alter the local character not just at this site, but set precedent for further developments of this nature and open up the development of the residential village of Freshwater.

Importantly, the proposal will allow for the degradation of the heritage value of the locally-listed Harbord Hotel.

7. **Stormwater and depth of excavation for 2 level basement car park.** As adjacent property with the current bottle shop built on our property boundary, we hold concerns to the depth and excavation for the proposed 2 level basement car park that is likely to require underpinning and ground anchors to be installed to stabilise.

There is already severe water run off being on the base of the Queenscliff Hill and current stormwater pits do not cater adequately and regularly have to be drained by the council. We hold concerns as the proposed relocation of stormwater and subsequent additional capacity relating to the proposed over intensification of the this small LR2 site.

Image from the economic report –this exemption for permitted use in LR2 is a corner friendly family hotel.



The proposal to alter residential property to incorporate into hotel accommodation isn't consistent with the character of the area and doesn't comply with this area is zoned residential R2. As stated earlier the current licence for the hotel is a historic exemption of this zoning. I disagree with the description of 64 Undercliff Rd as a 3-level building, the lower ground storage and one bedroom unit is lower ground level due to the slope of the block as you can see from this image. It also highlights how a development adjacent to this site behind the current hotel would overpower and detract from the current heritage significance of the Hotel building.

64 Undercliff Rd:



Bottle shop wall on border of our property Moore Rd



View from Bedrooms



Many thanks for your consideration of these objections and we sincerely hope these are taken into consideration by the panel to reject this application for rezoning of a residential block in LR2 zone.

Kind regards,

[Redacted signature]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

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I refer to the revised Planning Proposal for the Harbord Hotel and the extensive number of previous objections from neighbours and residents of Freshwater, which I expect will form part of the objection set to this existing revision - as the planned development has not addressed any of the stated concerns.

Freshwater is a residential suburb, one with a small but adequate residentially focused village, limited in both parking and access. There is little community benefit from such a development, more so it will cause congestion, frustrate residents and locals, while bringing in more tourists for the benefit of the hotel owners rather than community businesses. There is a risk the given the lack of

parking residents have to take their business elsewhere which is detrimental to the cafes, shops and supermarket that rely on this local support.

It is worth noting that the hotel previously had accommodation, which the new owners consciously chose to convert to new entertainment areas (also to the objection of residents concerned about noise, traffic, lack of parking and late night behaviour). This proposal amplifies those concerns - these have not been addressed with this application. Most of the residents are long-term members of the Freshwater community and are outraged that a recent acquisition and promise of community benefit outways the desire of those of us that have been in and created the Freshwater community we have today.

The size and bulk of the new structure, plus the addition of a rooftop pool and entertainment area is not in keeping with the heritage of the existing Harbord Hotel or that of the street and suburb. Manly is well established as a suburb with overnight accommodation, such a proposal should not be undertaken in a residential area. The increased congestion and traffic risks issues for pedestrians, particularly the young families that call Freshwater home.

We remain concerned about the additional patronage resulting in increased noise and unacceptable behaviour which the existing hotel has made little effort to curb. Again such a development would serve to increase those outcomes.

Finally this development further reduces the available residential accommodation to create short-term accommodation. Something the suburb does not require, nor desire

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

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Name withheld

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Suburb/ Town

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See attached

Dear Council

RE: Harbord Hotel redevelopment

We are concerned about the proposed expansion of the Harbord Hotel to include a motel, and encourage Council to oppose the rezoning proposal.

Freshwater is not an appropriate destination for a motel

Freshwater is unique because of its laid back, family character. This is wholly inconsistent with a motel (with a rooftop pool no less), and will be irrevocably changed if this rezoning is permitted to go ahead. Just because the council is broadly supportive of enhancing tourism doesn't mean this proposal should go ahead. Freshwater is not a zone identified for tourism given its lack of appropriate infrastructure.

The economic benefits of this proposal accrue overwhelmingly to the owners of the enterprise, not to the community.

Impact on parking and traffic

Anyone who spends any time in Freshwater knows the challenges of parking, particularly during summer months. The recent development at the Harbord Hotel has definitely increased the traffic and parking challenges for residents and visitors alike. Adding a motel on top is beyond the capacity of this location and this site specifically, and will certainly create chaotic and dangerous bottlenecks in the local streets.

The Harbord Hotel is one of the few "heritage" buildings in this part of the Northern Beaches. It would be a shame to allow a development to overshadow it (which any viable use of a rezoned site must do).

Additionally, the increased likelihood of antisocial behaviour and the impact of additional noise on the local community.

Development scale is inappropriate

The proposed development is of inappropriate size and scale relative to its context.

Demolition of housing to make way for a motel

The proposal to include 64 Undercliff Road in this development is both poor town planning and sets a dangerous precedent. There is no reason this land should be allowed a commercial use, other than its common ownership with the pub. This invites the creation of a second, ill-considered and unplanned commercial zone.

It also removes housing during a housing crisis and at a time when the NSW Government is putting pressure on Northern Beaches Council to increase housing supply, which is unconscionable.

The community has been very clear in the response at the panel stage (despite inadequate notification area and time) that the majority of residents are against the proposal, particularly because it is inconsistent with the character of the area. We request that, as councillors, you consider those original submissions.

This is for the benefit of a few wealthy corporate investors at the expense of a local community that is valued because of its small-village vibe.

If you are inclined to disagree and approve this proposal, could we please ask that at a minimum, you consider denying the additional use for no 64.

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

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Email

[REDACTED]

Suburb/ Town

Freshwater

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I agree to the Privacy statement

submission

I fully support the Harbord hotels revoking and development plans. I see it as beneficial to the community.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Narrabeen

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submission

As a local resident of the Northern Beaches and a long-time supporter of the Harbord Hotel, I wish to formally express my support for the approval of the proposed accommodation at the Harbord Hotel.

The Northern Beaches, particularly the area south of Manly, has a significant shortage of quality accommodation options. Visitors to our region often struggle to find suitable places to stay, which not only limits tourism but also affects local businesses that would otherwise benefit from increased visitor spending. The Harbord Hotel is an iconic establishment, and the addition of accommodation

would enhance its offering while providing much-needed infrastructure for the area.

From a community perspective, having accommodation attached to an already established and well-managed venue is far more desirable than piecemeal or poorly integrated developments. The Harbord Hotel has a long-standing reputation for being a responsible operator, a gathering place for the community, and a drawcard for visitors. Enhancing its facilities will only strengthen its role as a cultural and social asset for the Northern Beaches.

Importantly, this project will also help showcase Freshwater and surrounding suburbs to a wider audience, encouraging visitors to stay longer, experience our local restaurants, shops, and attractions, and ultimately contribute to the ongoing vibrancy and sustainability of our local economy.

For these reasons, I strongly support council's decision to approve accommodation at the Harbord Hotel. I believe it is a sensible, beneficial, and forward-thinking addition to the Northern Beaches.

Thank you for considering my submission

[REDACTED]

[REDACTED]

[REDACTED]

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Narraweena

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I am writing in support of the Harbord Hotel and its proposed expansion. My family and I are long-time residents of the Northern Beaches, and the Harbord Hotel has become a central part of our community life. We regularly visit the venue for family dinners and social catch-ups with other local families. I also frequent the hotel with friends to enjoy a drink and the welcoming atmosphere.

The Harbord Hotel is more than just a hospitality venue — it is a community hub that reflects the relaxed, inclusive spirit of the Northern Beaches. The team has consistently demonstrated a strong commitment to responsible management and enhancing the local experience.

I am genuinely excited to see the Harbord Hotel evolve and become a destination that attracts visitors from beyond the immediate area. I believe this will contribute positively to the local economy, support local employment, and enhance the cultural vibrancy of our region — while maintaining the character and charm that makes the venue so special.

I respectfully urge the Council to support the hotel's plans and allow it to continue growing as a positive presence in our community.

Thank you,

[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am writing in support of the planning proposal for the Harbord Hotel.

I have lived in Freshwater for over 20 years and own property in the suburb. Over that time I have seen the community evolve, and I value deeply the sense of place and belonging that Freshwater offers.

The Harbord Hotel has always been a landmark in our community, but in recent years, Glenn Piper and his team have brought new energy and life to the area through their sensitive renovation and stewardship of the Hotel. The upgraded venue has created a

gathering place that reflects the best of Freshwater – relaxed, coastal, and community-focused – while respecting the heritage and history of the site.

The proposed accommodation use will strengthen this role by:

Allowing the Hotel to welcome more visitors in a way that supports local businesses and tourism.

Providing quality managed accommodation in keeping with the character of Freshwater.

Enhancing the long-term sustainability of the Harbord Hotel as an anchor of our community.

As a local resident, I believe this proposal will add to the vitality and economy of the area, while preserving the community character that makes Freshwater so special.

I support the proposal and commend Glenn Piper and his team for their commitment to improving and investing in our suburb.

Sincerely,

A black rectangular redaction box covering the signature of the submitter.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

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No

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I agree to the Privacy statement

submission

This is to register my support of the attached plans for the Harbord hotel. The vast majority of residents in the local area are not from the area and have family and friends traveling from far and wide. To date the only viable options for accomodations is Airbnb and alike which is the cause of many social and local council challenges for the council not least a revenue loss.

It's key for council to solve for these challenges with both local government and private business support. The proposed development at the Harbord hotel is a great solution that balances solving real local challenges in accomodations, and building with locals in mind.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Curl curl

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I would like to support the proposal as a local resident. I often have friends and family coming to visit and it would be great to have local accomodation options for them to stay in Freshwater rather than having to stay Manly. The proposal would be great for local tourism and business. The proposal looks to include a lot of extra parking which is a real positive. The development itself looks to be suitable in terms of scale and streetscape.

Submission Type

I am making a personal submission

Title

Mr

First Name

██████

Family name

██████

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

██

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am a resident of Freshwater in close proximity to the Harbord Hotel and fully support this proposal. Strategic positive development of Freshwater is well overdue. It's not a 1970's distant beach town anymore.

The hotel is a great asset to Freshwater and looks fantastic since its recent upgrade. The property is well managed, and all my experiences have been nothing but positive under the new management.

The development application for this iconic asset in Freshwater is great, well thought out, measured and aligned to the feel and look of

the area. It is balanced and NOT over the top like some other applications I have seen approved in the area. This will be a positive step forward for the Freshwater community. It will be great for the locals and families who live here as well as offer something special for the visitors to the area.

Freshwater is an icon for the beaches of NSW and specifically the Northern Beaches. This intelligent development of the hotel will continue to elevate and attract more support for the growing tourism to the area in addition to generating material and positive employment for the locals.

Parking is a premium in Freshwater and this development will also help ease that challenge for local council.

The accommodation proposal of just 37 rooms over just 3 stories (unlike the many eyesores high rises nearby...how they ever got approved back in the day is beyond me) is exactly what the area needs and has been crying out for a very long time with the very limited accommodation options available today. Airbnb is not the solution for this area and based on the demographics would never scale anyway with very limited supply.

I am 100%+ supportive of this application and the sooner it happens the better it will be for Freshwater and its future.

Kind regards

[REDACTED]

Submission Type

I am making a personal submission

Title

Miss

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

I am a resident and fully support the request for development, the area will benefit greatly from the development proposed.

Submission Type

I am making a personal submission

Title**First Name****Family name**

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I fully support the proposal for the development and operation of hotel accommodation to be integrated and managed in association with the existing Harbord Hotel site.

We are in need for more accommodation on the Northern Beaches and this provides a great alternative away from Manly.

They have done a fantastic job with the current hotel, responsible management, minimizing noise and respecting the community. I am confident the build will only enhance the local area and be completed responsibly for the better of the local community.

Submission Type

I am making a personal submission

Title

Mrs

First Name

██████

Family name

██████

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Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

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Suburb/ Town

Freshwater

I have made a reportable political donation

No

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I agree to the Privacy statement

submission

As a resident of Freshwater I am fully supportive of this submission and believe it will be a positive step forward for the Freshwater community for the future. It will provide jobs and allow others wanting a short stay to experience our wonderful community, beach, local restaurants and bars.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Beacon Hill

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Submission in Support

I am writing to express my strong support for the proposed hotel development at the Harbord Hotel site. This project presents a fantastic opportunity to enhance our local area by providing much-needed high-quality accommodation and a dedicated function centre, which will benefit both residents and visitors alike.

Currently, the area lacks a premium hotel that can cater to tourists, business travelers, and locals seeking a sophisticated venue for

events. The Harbord Hotel development will fill this gap, offering modern facilities, comfortable stays, and a versatile function space suitable for weddings, conferences, and community gatherings. This will not only improve hospitality options but also stimulate local businesses and tourism.

I am particularly pleased to see that the proposal includes adequate parking provisions, which will help manage traffic and ensure convenience for guests and visitors. Thoughtful planning in this regard demonstrates a commitment to minimizing disruptions while maximizing benefits for the community.

Overall, this development aligns with the growing demand for quality infrastructure in our area and promises to be a valuable asset. I encourage the approval of this project and look forward to seeing the positive impact it will bring.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

Submission Type

I am submitting on behalf of my organisation

Title**First Name****Family name**☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email**Suburb/ Town**

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

On behalf of Pilu at Freshwater, I would like to express our strong support for the proposal to enable hotel accommodation associated with the Harbord Hotel.

As a business that has operated in Freshwater for over 20 years, we've seen first-hand how important quality accommodation is in attracting visitors and supporting local businesses. Many of our guests travel from outside the area and regularly comment on the lack of suitable places to stay nearby and this proposal goes a long way towards addressing that.

We believe the introduction of hotel accommodation will encourage longer stays, support local jobs and help reinforce

Freshwater/Harbord as a vibrant coastal tourism destination.

For these reasons, we fully support the proposed amendments to Clause 14 of Schedule 2 of the Warringah LEP 2011, and we look forward to seeing this important project progress.

Submission Type

I am making a personal submission

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Manly

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Fully support development. Would benefit the community

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Beacon Hill

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Submission in Support of Planning Proposal – Harbord Hotel

I support the planning proposal to enable hotel accommodation integrated with the existing Harbord Hotel. The proposal reflects a strategic enhancement to local hospitality infrastructure, supporting tourism, economic activity, and community amenity.

I endorse the proposed amendment to Clause 14 of Schedule 2 of the Warringah LEP 2011 to permit, with consent.

The development and operation of hotel accommodation associated with the Harbord Hotel site.

This amendment is appropriate, facilitating a complementary land use that aligns with the site's established character and contributes positively to the area's future growth.

Submission Type

I am making a personal submission

Title**First Name****Family name**☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email**Suburb/ Town**

Freshwater

I have made a reportable political donation

Yes

☒

I agree to the Privacy statement

submission

I am a resident of the Freshwater and am supportive of this application. The hotel would provide much needed short term professionally run accommodation which is sorely lacking in Freshwater and the surrounds. The hotel would support tourism which is valuable to the vibrancy of the village and necessary to make the local businesses viable. In addition it provides accommodation for family and friends that are visiting residents from out of town. There is an opportunity for businesses to use the hotel for conferences and team buildings which is important in the age of “work from home”. These business gatherings would bring additional revenue to the local businesses. The hotel is boutique in nature, and as such would have limited negative impact on the community and is unlikely to add disturbances beyond the existing pub as relative numbers of guests would be small. As I understand it the hotel would

also add additional parking to accommodate guests which would negate adding any parking stress. There is not much quality beachside short term accommodation between Freshwater and Newport - this proposal would help to fill that gap.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Palm Beach

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I feel the northern beaches needs more of these accommodations

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No



I agree to the Privacy statement

submission

To have local accommodation will add a lot of value to us and the community who have friends and family visiting, special from overseas and when unable to host at their own house or apartment.

More available central parking will bring more visitors to Freshwater Village / Beach. Consequently local business will grow.

As a Freshwater resident for years I support this planing proposal.

Submission Type

I am making a personal submission

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Beacon Hill

I have made a reportable political donation

No



I agree to the Privacy statement

submission

I am writing to express my support for the proposed development of hotel accommodation to the existing Harbord Hotel site in Freshwater.

This addition represents a significant opportunity to deliver lasting social and economic benefits to the local community and to the Northern Beaches region more broadly.

Despite strong demand for accomodation in Freshwater and the Northern Beaches in general, the area currently offers limited high-

quality accommodation options.

Adding hotel rooms to the Harbord Hotel will meet a growing need for short-stay accommodation in a sought-after coastal location and attract visitors who contribute directly to local businesses, hospitality, and services.

In conclusion, the addition of hotel accommodation at the Harbord Hotel represents a unique opportunity to deliver positive and lasting outcomes for the local community and for the broader Northern Beaches region. It strikes the right balance between growth and preservation, enhancing the area's appeal without compromising its heritage.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

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Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

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I agree to the Privacy statement

submission

As a resident of Freshwater, I am writing to register my support for the accommodation proposal at the Habord Hotel. As a long-time visitor and supporter of the Harbord Hotel, it plays an important role in the community and has the potential to deliver economic and social benefits through this upgrade.

The addition of accommodation would be a major positive for the local area. The Northern Beaches is already a highly sought-after destination and attracts a huge number of visitors. However, there remains a shortage of high-quality accommodation options that reflect the character of the area. By creating a boutique hotel experience right by the beach, the Harbord Hotel would not only

encourage visitors to stay longer but also spread their spending across local businesses – cafes, restaurants and retail stores. This type of flow-on benefit is exactly what strengthens the broader local economy.

Importantly, the development would also support job creation. Beyond the construction phase, the ongoing operation of the accommodation will create long-term employment opportunities in hospitality, guest services, and tourism. The Harbord Hotel already employs and trains a wide range of staff, many of them young locals gaining valuable skills and experience. Expanding its offering will only enhance this role as a training ground and employer in the community.

On a social level, I see great benefit in transforming the Harbord Hotel into a place where visitors can immerse themselves more deeply in the unique character of the Northern Beaches. Instead of being limited to a short visit for a meal or drink, guests will have the opportunity to stay, connect, and experience 'the Freshwater life'.

The venue has always celebrated the relaxed coastal lifestyle, surf heritage, and sense of community that make Freshwater so distinctive, ensuring the Harbord Hotel continues to be a gathering place for both locals and visitors.

As a regular patron, I can say with confidence that this proposal will elevate the Harbord Hotel experience, ensuring the hotel remains relevant, sustainable, and capable of meeting the needs of the community and visitors alike for decades to come.

For these reasons, I strongly support the application and encourage its approval.

Sincerely,

[REDACTED]

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Avalon Beach

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

This is a very positive addition to Freshwater and the entire Northern Beaches region and community. This development will ensure there is accommodation for tourists and locals who are currently severely under served with available choices. I and my wider family who live in the region want to see this approved immediately.

Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Sydney

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Submission in Support of Planning Proposal

Harbord Hotel – 29–31 Moore Road and 64 Undercliff Road, Freshwater

To: Department of Planning, Housing and Infrastructure

Re: Planning Proposal PP-2024-1593

Introduction

I am writing in support of the planning proposal for the Harbord Hotel site at 29–31 Moore Road and 64 Undercliff Road, Freshwater. While I am not a local resident, I regularly visit Freshwater — both for its unique village atmosphere and the iconic Harbord Hotel. From my perspective as a frequent visitor, this proposal represents a fantastic opportunity to strengthen Freshwater as a welcoming destination while ensuring the Harbord Hotel continues to thrive for decades to come.

Why I Support the Proposal as a Regular Visitor

1. Enhancing the Freshwater Experience

Freshwater is one of Sydney's most special beach suburbs. It has a strong community spirit, a beautiful beach, and a rich cultural history. The Harbord Hotel is at the heart of that identity. Every time I visit, it is clear how important the Hotel is — not just as a place to have a meal or drink, but as a central hub of activity and connection.

Adding quality accommodation to the Hotel would greatly enhance the visitor experience. It would allow people like me to stay in Freshwater, rather than travelling back and forth from Manly or the city. This would give visitors more time to enjoy the beach, support local businesses, and immerse themselves in the local culture.

2. Supporting Local Jobs and Economy

As someone who chooses to spend time and money in Freshwater, I know first-hand the economic benefits that visitors bring. A hotel wing will encourage people to stay longer, spend more locally, and support a wide range of businesses — from cafés and restaurants to shops and surf schools.

This proposal ensures Freshwater's local economy remains strong and resilient, with jobs created not just in the Hotel itself but across the wider community.

3. Respecting Heritage While Moving Forward

One of the things I appreciate most about the Harbord Hotel is its character. It has a heritage and style that is unique and should be celebrated. From what I have seen of this proposal, it does exactly that. By locating the new accommodation on the existing car park,

it avoids overwhelming the area while still providing modern, high-quality facilities.

The project builds on the Hotel's historic role of offering accommodation, which makes it a respectful continuation of its story rather than a departure from it.

4. Better Amenities for Everyone

Parking and facilities are always important considerations for visitors. I see this proposal as very forward-thinking in including a 72-space basement car park, a swimming pool, and a gym. These are amenities that will not only make it easier for visitors like me to enjoy the Hotel, but will also reduce the pressure on surrounding streets and improve the overall amenity of the area.

Community and Tourism Benefits

From a visitor's perspective, Freshwater has always been a little under-served when it comes to accommodation. Many people rely on short-term rentals, which can disrupt residential life. This proposal offers a far better solution: purpose-built hotel accommodation in a location designed to handle it.

This will give Freshwater the ability to welcome more visitors without negatively impacting the residential character of the suburb. In fact, it strengthens Freshwater's reputation as a destination while keeping tourism activity centred around its most iconic venue.

Conclusion

As someone who regularly visits Freshwater and values the Harbord Hotel as part of that experience, I strongly support this planning proposal. It is a respectful, sensible, and forward-looking project that:

Restores the Hotel's heritage role as a place of accommodation.

Provides new facilities that will enhance both visitor and community life.

Creates jobs and strengthens the local economy.

Makes Freshwater an even more welcoming destination for those who want to stay and experience all it has to offer.

The Harbord Hotel is already a landmark. With this proposal, it has the chance to continue serving the community and its visitors in ways that are sustainable, inclusive, and positive for everyone.

I urge the Department and relevant planning authorities to approve this proposal.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Sydney

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Submission in Support of Planning Proposal

Harbord Hotel – 29–31 Moore Road and 64 Undercliff Road, Freshwater

To: Department of Planning, Housing and Infrastructure

Re: Planning Proposal PP-2024-1593

Introduction

I am writing to support the planning proposal for the Harbord Hotel at 29–31 Moore Road and 64 Undercliff Road, Freshwater. As a younger professional living on the Northern Beaches, the Harbord Hotel has always been a key part of my social and cultural life. This proposal represents an exciting opportunity to not only protect its heritage but also ensure it evolves in a way that supports the next generation of locals and visitors.

Keeping Freshwater Vibrant for the Future

The Harbord Hotel is more than just a pub. It is a central gathering point, a cultural landmark, and one of the defining features of Freshwater's identity. For many in my generation, it's where we meet friends, attend events, and celebrate milestones.

Introducing accommodation as part of the Hotel's offering is not only a nod to its history but also a step towards securing its relevance in the future. By expanding its role to include high-quality visitor stays, the Hotel can continue to thrive and remain a positive hub for Freshwater for decades to come.

Economic Opportunity for Local Workers

The Northern Beaches is home to many young people like myself who want to live, work, and build careers locally. Opportunities, however, can sometimes be limited.

This proposal creates new pathways for local employment in hospitality, management, and tourism. It allows young people to gain experience and find stable work without having to commute to the city. It also strengthens the local economy, which in turn supports other businesses where we shop, eat, and spend our weekends.

By approving this proposal, the Department would be investing in opportunities for the next generation of Freshwater residents.

Supporting Sustainable Tourism

Freshwater is a world-famous surf and beach destination, and the demand for accommodation here is undeniable. Without purpose-built facilities, visitors often turn to short-term rentals in residential streets, which can undermine community cohesion and reduce housing availability.

The Harbord Hotel's proposed 37-room wing provides a far more sustainable and appropriate alternative. It allows visitors to stay in the heart of Freshwater, close to the beach and transport, while keeping short-term rental pressures out of residential areas.

This is the smart way to grow tourism — in a managed, professional, and community-friendly manner.

Enhancing Local Amenity

The proposed inclusion of a swimming pool, gym, and a 72-space basement car park shows that the developers have considered community needs. Parking is a common challenge in Freshwater, and the addition of basement parking will help reduce pressure on surrounding streets.

As someone who frequently visits the Hotel with friends, I see these facilities as a real positive. They modernise the site and make it more functional for both locals and visitors, while ensuring Freshwater continues to offer a high standard of amenity.

Heritage with Progress

One of the best aspects of this proposal is that it respects the Hotel's history while moving forward. Accommodation was always part of the Harbord Hotel's story, and this project revives that legacy in a thoughtful way. The design carefully integrates with the existing Art Deco style, making it an enhancement rather than a disruption.

It shows that heritage doesn't have to mean "standing still" — it can mean adapting and evolving responsibly.

Conclusion

As a younger local professional, I want to see Freshwater thrive into the future. This planning proposal achieves that by:

Strengthening the Harbord Hotel's role as a cultural and social landmark.

Creating meaningful local jobs for young people on the Northern Beaches.

Supporting sustainable tourism that respects residential character.

Adding much-needed visitor facilities while reducing parking pressure.

Respectfully restoring the Hotel's historic role as a place of accommodation.

For all these reasons, I strongly support the proposal and encourage the Department to approve it. The Harbord Hotel is an icon, and this project ensures it remains a proud part of Freshwater's future.

Submission Type

I am making a personal submission

Title

Mrs

First Name

[REDACTED]

Family name

[REDACTED]



Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Sydney

I have made a reportable political donation

No



I agree to the Privacy statement

submission

Submission in Support of Planning Proposal

Harbord Hotel – 29–31 Moore Road and 64 Undercliff Road, Freshwater

To: Department of Planning, Housing and Infrastructure

Re: Planning Proposal PP-2024-1593

Introduction

I am writing to offer my strong support for the planning proposal at the Harbord Hotel in Freshwater. While I do not live in Freshwater, I am a regular visitor who has been coming to the area for many years. For me, Freshwater has always been a special place to spend time with family and friends, and the Harbord Hotel is at the heart of those experiences.

A Special Place for Visitors

As an older woman, I appreciate the things that make a place welcoming: history, character, safety, and atmosphere. The Harbord Hotel has always provided that, and each visit feels like coming back to a familiar and much-loved place.

The proposal to expand the Hotel and reintroduce accommodation feels like a natural and positive step. It restores part of its history while also giving people like me, who visit regularly, the opportunity to stay closer to the beach and the village rather than travelling back and forth from elsewhere.

Supporting the Local Economy

When I visit Freshwater, I don't just spend time at the Hotel — I shop at the local boutiques, enjoy coffee at the cafés, and often bring friends along who also spend money in the area. By providing proper hotel accommodation, the Harbord Hotel will allow more visitors to do the same, staying longer and contributing more to local businesses.

I know how important this is for smaller community villages. Visitors like myself want to spend money locally, and this project creates the perfect way to do that.

Thoughtful Facilities

I was pleased to see that the proposal includes a swimming pool, gym, and a basement car park. These additions make the development practical and visitor-friendly, while also reducing pressure on surrounding streets. For older visitors like myself, knowing there is secure parking and modern facilities is a great reassurance.

It shows that the proposal has been designed with all types of visitors in mind — families, younger travellers, and older people like me who value convenience and comfort.

A Respectful Approach to Heritage

I value history and heritage deeply, and I see this proposal as one that respects the Harbord Hotel's past. Accommodation has always been part of the Hotel's story, and this project brings that tradition back in a way that feels appropriate and respectful.

Rather than taking away from the charm of the Hotel, the expansion strengthens its role as a proud landmark and ensures it continues to be enjoyed by future generations.

Conclusion

Freshwater has always been one of my favourite destinations, and the Harbord Hotel is a big part of that. This proposal will:

Restore the Hotel's historic role of offering accommodation.

Provide much-needed facilities for visitors.

Support local businesses and the wider Freshwater economy.

Reduce parking pressures with a basement car park.

Ensure the Hotel continues to be a welcoming and vibrant part of the Northern Beaches.

From my perspective as a regular visitor, this project makes Freshwater an even better place to come and stay. It is respectful, thoughtful, and positive for the community as a whole.

I strongly support the approval of this proposal



Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

To whom it may concern, I would like to articulate my strong support for the proposed rezoning, based on the following reasons:

1. There is no hotel style accommodation in Freshwater. When we have friends and family visiting, they have to stay in a hotel that is not around the corner. While AirBnB exist in Freshi, it is not the same level of convenience as a hotel.
2. Having a hotel so close to the beach in Freshwater will attract tourist that will spend time and money in Freshwater and support the local community.
3. Parking at and around the pub has always been a challenge. The addition of the hotel will create more parking that is essentially

needed and will benefit the whole community.

4. I don't share concerns around a hotel being in a residential area. It is the reality in a densely populated area like the Northern Beaches. Freshwater village is 100m distance away and surrounded by residential properties.

Kind regards,



Submission Type

I am submitting on behalf of my organisation

Title

Ms

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Freshwater

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

See attached submission.



14 January 2025

Department of Planning, Housing and Infrastructure
Locked Bag 5022,
Parramatta NSW 2124

CC: Sydney North Planning Panel

RE: SUBMISSION LETTER TO PLANNING PROPOSAL
PREMISES: 29-31 MOORE ROAD (HARBOURD HOTEL) AND 64 UNDERCLIFFE ROAD FRESHWATER
COUNCIL REF: PEX2024/0005
DPHI REF: RR-2024-34

1. Introduction

This submission letter has been prepared by Paro Consulting on behalf of 21 landowners in relation to the planning proposal seeking to amend permissible uses at 29-31 Moore Road (Harbord Hotel) and 64 Undercliff Road, Freshwater.

The purpose of this submission is to outline key points of objections for the Department of Planning, Housing and Infrastructure (DPHI's) and the Sydney North Planning Panel's consideration during the upcoming assessment of the Planning Proposal under the rezoning review process.

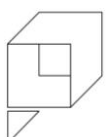
A significant number of residents and landowners strongly oppose the expansion of the pub operations, and the introduction of hotel and motel use in this locality, with 96 submissions received by Council during the initial public consultation phase. A summary of key considerations is provided below.

2. Background

The Planning Proposal seeks to amend the Warringah Local Environmental Plan 2011 to permit 'hotel or motel accommodation' as an additional use and to extend the existing permitted use of 'pubs' to 64 Undercliff Road, a residential flat building consisting of three apartments. The intended outcome is to facilitate the development of an expanded pub and to introduce a 37-room hotel. Concept plans also include a basement carpark.

An overview of the planning proposal assessment to date is provided below.

- Planning Proposal lodged with Council in July 2024.
- Council facilitated the public exhibition of the proposal during August and September 2024 with a total of 96 submissions received.
- The Northern Beaches Local Planning Panel considered the proposal at its meeting held on 16 October 2024. The Panel recommended that Council progress the planning proposal with some amendments; including the need to prepare a site-specific Development Control Plan (DCP), and to allow expanded pub and hotel uses across the proposed basement.



- At its meeting held on 12 November 2024, Council resolved against progressing the planning proposal.
- On 18 November 2024, the proponent lodged a Rezoning Review with the DPHI.

3. Matters for consideration

This section outlines key issues for consideration by the DPHI's North District planning team and the Sydney North Planning Panel as part of its assessment under the rezoning review process. A future submission will be provided should the Planning Proposal be the subject of community consultation following a Gateway Determination.

3.1. Strategic and site-specific merit

The planning proposal is considered inconsistent with the DPHI Local Environmental Plan Making Guideline December 2021 as it does not adequately demonstrate strategic and site-specific merit per the criteria stipulated in the DPHI Local Environmental Plan Making Guideline.

An assessment against key priorities is outlined below.

3.1.1 Strategic Merit

The proposal does not align with the NSW strategic planning framework including the North District Plan, Local Strategic Planning Statement (LSPS) and the Northern Beaches Local Housing Strategy (NBHS). These plans consistently reinforce priorities for the promotion of liveable cities, housing growth and housing diversity.

- The Northern Beaches Council has a minimum 5-year housing target of 3,500 new dwellings which has been set by the DPHI. However, the Department of Planning projects only 1,650 new dwellings will be delivered over the next 5 years resulting in a significant short fall of 1,835 dwelling for the LGA (52% shortfall). The proposal and results in the loss of three rental apartments (consisting of being two three bedroom and a one-bedroom dwellings) to accommodate short term tourist accommodation. The proposal is at odds with the following key strategic priorities.

LSPS key priorities

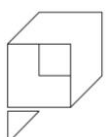
- *Priority 17 Centres and neighbourhood designed to reflect local character*
- *Priority 18 Protect, conserve and celebrate heritage*

NBHS key priorities

- *Priority 1: Housing target - meet District Plan and 6-10 year housing target, and*
- *Priority 3: Social and affordable housing - encourage more affordable housing.*

The proposed LEP amendment will further exacerbate the housing target shortfall in the LGA and exacerbate the shortage of this housing type.

The proposal is also at odds with sound strategic planning principle of co-locating commercial and service-based uses in commercial zones and activity centres. Hotel and pub land uses are permissible in the *E1 Local Centre*, *E2 Commercial Centre* and *E3 Productivity Support* land use zones. These centres are expected to be developed for intensive land uses and as such, are supported by strategic government investment in public transport infrastructure and public domain improvements including pedestrian connectivity. The subject property is not located in an accessible area. The proposed uses are inconsistent with the strategic intent of the residential zone, and are contrary to the expectation of future character.



3.2.2 Site Specific merit

The proposal is considered to exceed the capacity of the site and will result in unavoidable impacts upon the local environment. Key matters for consideration include the following matters.

- The intensification and scale of the proposal exceeds what is deemed appropriate for the site. The built form to be facilitated under the planning proposal appears excessive in floor area, site coverage and scale in the context of the future desired character.
- The proposal will inevitably increase visitation to the site and likely increase the noise nuisance (which currently impacts nearby residences) and traffic volumes. It is unlikely that adequate mitigation measures can be effectively implemented and maintained in perpetuity considering that venue operators have not been able to adequately manage the noise nuisance and patron behaviour on many occasions.
- The incorporation of 64 Undercliffe Road into the development site is likely to increase impacts upon the locality considering that the existing built form at that property provides a buffer between the licensed premises and adjoining residential dwellings.
- The proposal has not adequately demonstrated consistency with Appendix 1 of the NSW Coastal Design Guidelines 2023, including the requirement that foreseeable impacts of stormwater upon the coastal environment are considered at the planning proposal stage rather than being deferred to the Development Application assessment per the approach for this proposal. Specifically, A.1h of Appendix 1 required a planning proposal to *“Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater”*.

Further, it is unlikely that Council staff had adequate time to assess the proposal against the Guidelines considering that additional information was provided the day before Council’s meeting held 12 November 2024.

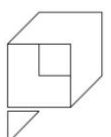
- The local road network is not designed to cater for high traffic volumes, noting that primary site access provided by Charles Street is built with a steep gradient impacting site lines and therefore safe vehicle egress from the property. The local roads are also built with narrow carriageways impacting safe manoeuvring of local traffic.

3.2. Wastewater and stormwater

The following matters must be resolved prior to progressing the Planning Proposal as they are likely to impact the development footprint and long-term operation of utility infrastructure.

- The unresolved impacts of the proposal on Council’s stormwater infrastructure and the Sydney Water sewer line through the property have a material impact upon any future basement capacity. This may result in a reduction of parking provided on-site or result in additional at grade parking impacting the location of built form.
- The impact upon the coastal environment has not been substantiated per the requirements of the NSW Coastal Design Guidelines 2023 (refer to Part 2.2 *Site specific merit* contained within this letter).
- The proposed stormwater modelling should consider overland flow and velocity above the 1% AEP and include climate change assumptions.
- The cost to Council for the ongoing maintenance of the reconfigured stormwater is unsubstantiated.

The design, ongoing performance and maintenance of stormwater and wastewater infrastructure must be resolved prior to DPHI’s providing its assessment report to the Sydney North Planning Panel.



4. Recommendations

The planning proposal should not be supported based on the key issues summarised below:

- The Planning Proposal does not adequately demonstrate strategic or site-specific merit and is therefore considered inconsistent with the DPIE Local Environmental Plan Making Guideline December 2021.
- The proposal removes housing supply in an area which has limited capacity for additional housing supply and diversity and Council are currently include a 52% shortfall of the required 5-year housing target set by DPHI.
- The proposal is inconsistent with the character of the residential neighbourhood and is inappropriate within the context of its immediate locality.
- The existing amenity impacts associated with the operation of the pub are likely to be exacerbated while the introduction of a hotel/motel will increase visitation and associated externalities relating to traffic safety.
- The management of water and sewer infrastructure has not adequately been resolved.
- Proper process has not been followed as the proposal has not adequately demonstrated consistency with Appendix 1 of the NSW Coastal Design Guidelines 2023.

5. Conclusion

The Planning Proposal facilitates development that will result in unacceptable amenity impacts. The proposal is at odds with character of the locality and key principles set out in strategic land use policy.

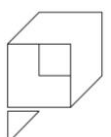
The design and ongoing management of stormwater infrastructure as well impacts upon the coastal environment have not been appropriately addressed.

The planning proposal should not be supported. We look forward to working with the DPHI and Sydney North Regional Panel to ensure that the appropriate consideration is given to residents and the broader community.

Feel free to contact me on 0422 983 710 or at daniel@paroconsulting.com.au should you wish to discuss the context of this letter and to arrange an opportunity to represent the landowners at an upcoming meeting.

Kind regards,

[Redacted signature block]



Submission Type

I am making a personal submission

Title

Mr

First Name

[REDACTED]

Family name

[REDACTED]

☐

Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[REDACTED]

Suburb/ Town

Queenscliff

I have made a reportable political donation

No

☒

I agree to the Privacy statement

submission

Having reviewed the plans I think this development will be a significantly more attractive dwelling than what was on the plot previously.

As such I am very supportive of this plan to be approved and implemented in the street.

Submission Type

I am making a personal submission

Title

First Name

[REDACTED]

Family name

☐

Name withheld

Please tick this box if the submitter do not want their name published in the list of submitters on the department's website

Email

[REDACTED]

Address 1

Address 2

Suburb/ Town

Post code

State

Does the submitter have any political donations to report?

No

Please provide your view on the application**submission**

I write in support of the above proposal.

The northern beaches does not have enough accommodation and tourism is important to our area.

I support the conversion of the hotel car park and adjoining building into hotel accommodation and believe that it would be good for the area.



From:

To:

Subject:

Planning Proposal - Harbord Hotel (29-31 Moore Rd and 64 Undercliff Rd, Freshwater)

Date:

Wednesday, 20 August 2025 12:57:45 PM

Dear Ayva

I write in support of the above proposal.

The northern beaches does not have enough accommodation and tourism is important to our area.

I support the conversion of the hotel car park and adjoining building into hotel accommodation and believe that it would be good for the area.

Kind regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]