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Subject: Submission; DA for SEPP Seniors Living at 3 Central Rd Avalon

February 16 2020

By email from Avalonpreservationa@gmail.com

Avalon Preservation Association wishes to object to this DA for a SEPP Seniors Living project at 3 Central Rd AVAlon Beach.

Our objections:

1. The building height proposed of 9.91m exceeds the permitted height of 8.0m. This is a major variation and should be refused. One effect of this would be to present a high "wall" facing Dunbar Park, and for pedestrians walking up Patterson Lane.
2. The application provides convoluted and contradictory arguments for exceeding the permitted Floor Space Ratio of 0.5:1 by a massive 30% to 0.65:1.
On page 29 of **Statement of Environmental Effects**, Item 3 Response states "*Whilst strict compliance with the policy control is not provided, the compliance with the local control and its underlining objectives indicates the development is appropriate.*"
Also on page 29 Item 4 Response, states "*The standard has not been set by Council but by state policy.*" Clearly contradictory. The SEPP is clear on its requirements and a variance of 30 % should not be accepted on any site regardless of alleged benefits.
3. Location in Central Road. Replacing two houses with eight units, with a possible two cars each will further increase traffic in Central Road at a particularly difficult site opposite the Maria Regina school and quite close to the intersection with Barrenjoey Rd. Relying on car access via Patterson Lane is not acceptable as it is very narrow and already used by the units facing Old Barrenjoey Rd, and well used by pedestrians.
4. Not in the Public Interest. The **Statement of Environmental Effects** states:
*10.6 The Public Interest The public interest is served by the provision of the appropriate land use that is consistent with Local and State planning objectives. The land use responds at a strategic level to desired planning outcomes together with increased **affordable housing opportunities** within the Sydney region and the Northern Beaches LGA specifically.*
This project does not provide "affordable housing".
Affordable housing is housing that is appropriate for the needs of a range of very low to moderate income households and priced so that these households are also able to meet other basic living costs such as food, clothing, transport, medical care and education. As a rule of thumb, housing is usually considered affordable if it costs less than 30% of gross household income See: <https://www.facs.nsw.gov.au/providers/housing/affordable/about> . Not the case with this development. So we say this is in the developer's interest, not in the public interest.
5. **Statement of Environmental Effects** Page 31 Part 4 Development Standards to be Complied With. Item 40 4[c] states "a building located in the rear 25% area of the site must not exceed 1 storey in height." The response states "The site is a corner allotment with no rear boundary" This is nonsense as the site is rectangular with a rear boundary parallel to the frontage to Central Rd, as clearly shown on the Survey. This standard therefore must be complied with.
We contend that approval of this application will set a precedent to further variations in future developments. Standards and regulations are to be observed and protected, not thwarted for private profit.
We urge Council to refuse this application.

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Management Committee
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