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27/06/2022

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RE: DA2021/1912 - 2 - 4 Lakeside Crescent NORTH MANLY NSW 2100

Thankyou for the opportunity to respond to the latest submissions by Landcom.

The application for this development is still confused. My latest advice from landcom is that "A minimum 12 homes will be affordable rent TARGETED at women over 55. Link Wentworth will manage the allocation of these throughout the building based on the needs of their tenants. Link Wentworth will also determine tenure arrangements for the remaining units nearer completion."

So what is this? Is it affordable housing, it is seniors housing, is it over 55 female housing or is it demographic unknown housing?

And why only 12? Why the rest seniors when Landcom, in previous email, informed me 1499 women over 55 are experiencing housing stress in the Northern beaches LGA.

Similarly, I have attempted to clarify with Landcom, the situation regarding floods. Landcom claims the water did not reach the ground floor level of the existing Queenscliff Health Centre Building. I do genuinely hope this is correct.

However, I am further confused about the occupancy of the building as I am told: "We propose locating affordable housing on the ground floor level and seniors housing on levels one and two. This will ensure less able residents are able to safely stay in place during a flood event. In addition, a flood refuge is provided on Level 1 for ground floor residents and visitors should an extreme flood occur above the flood planning level."

I feel this response fails to appreciate the magnitude of the floods of March 2022 and the more recent floods across the Passmore Reserve on June 13, is the lack of understanding or planning regarding flooding impacts on the residents of the development.

The new ground floor apartments in the Queenscliff Health Centre will not be above the flood plain. Council only has to look at the homes in the surrounding area to understand the havoc that will be wreaked when we have another flood.

Three months on, many residents are still unable to return to their homes because the damage was so extensive.

If the carpark area is developed into three new lots as proposed, this will add to the flooding impact both on existing surrounding homes and the proposed ground floor boarding house.

Meanwhile, vulnerable senior residents upstairs may become trapped in or outside their homes. Photographs of the March flooding are enclosed below. I have sent these to Rosemary Hooper at Landcom.

Re the response from Cardno now Santec dated May 15 2022 for the attention of Rosemary Hooper at Landcom.

Landcom was asked how it was going to protect residents in the case of floods, such as those that hit the Queenscliff Health Centre in March 2022.

They state there will be a designated refuge area on Level 1 but agree elderly residents, some of whom may be incapacitated, may not be able to reach Level 1 in such a flood as the lifts are likely to be rendered useless due to loss of power together with flood waters penetrating the lift well and shutting sensors down.

This is their proposed solution:

It is our understanding that consideration is being given to installing solar panels as part of the development and that this system would likely include battery storage. This would provide a back-up source of power to operate the lift in the event the mains power supply is disrupted. This would allow vulnerable people on the ground floor to use the lift to access the refuge.

If the liftwell was flooded, it is proposed that consideration could be given to installing a battery operated stair lift or that "flood wardens would manually assist any vulnerable persons... up the stairs to Level 1.

This gives rise to a number of observations.

1. How is a state government run organisation only "giving consideration" to installing solar panels? NSW has clear guidelines on reducing emissions by 2030 and achieving Net Zero by 2050. How can its own entities not be automatically installing solar panels? In addition, surely an affordable housing provider has to make that development as sustainable as possible in order to reduce not only rent but also utilities. It has been shown that those on the lowest incomes are disproportionately more likely to live in homes that are freezing in winter and too hot in summer. It isn't enough for affordable housing to exist. It needs to be fit for purpose.
2. "Consideration could be given" to a stairlift is vague. Clearly this has not been thought through.
3. What is a flood warden? Are they to be permanent and on hand 24/7? The March 2022 floods happened within minutes with our order to evacuate not arriving until two hours later. How long are vulnerable people to wait while the water rises around them until these flood wardens appear? The water was waist-deep in Lakeside Crescent. The only people able to access the area were those in boats.
4. What will happen to the residents once the floods subside? Who will take responsibility for refurbishing their home and where will they live in the meantime?
5. Who will bear responsibility for flood damage? Flood insurance is either impossible to get in this area or prohibitively expensive. Many residents are still negotiating with their insurers and waiting for essential work to be done.

The Flood Emergency Response Plan dated 15 May 2022

Council would, quite rightly, forbid any other accommodation to be built in this area at these levels.

The hypothetical charts ignore the fact that the area and all the homes in the vicinity were inundated in March this year. Many cars were lost and buildings inundated only this week (June 13) during the king tides, the highest since the 1970s.

Re the Landcom Letter to Louise Kerr dated May 17 2022

It's generally accepted that affordable housing should first be offered to key workers with over 55 women also a major demographic of concern. Reports indicate, in fact, that Sydney is the least affordable city for essential workers such as nurses, teachers and police officers (http://www.prrs.net/papers/Christensen_AffordableHousingSupply.pdf)

In this letter, Landcom justifies creating affordable housing for seniors as they will then downsize. How will this create more affordable housing unless they are forced out of larger social housing dwellings? Contrary to expectations, it has been shown that older people don't necessarily want to live in smaller places as they age - they want a spare bedroom either for visitors or as a utility room for crafts or study as they spend more time at home.

Also, this development appears to embrace none of the guidelines in the Federal Government's

liveability and ageing in place reports and has very limited community facilities.

Letter to council from Integrated Design Group dated May 16 2022

Simon Thorne's letter about private open space refers to communal outdoor spaces which are very small with limited facilities. You can't force communities, they have to be designed for all personalities, whether extrovert or introvert or a mix of both. They have to be low-stress so a communal laundry or vegetable garden, for instance. Also, what are residents to do in cool or wet weather?

It is a constant frustration also that, while decent affordable housing has ample room for bicycles and encourages cycling as a means of transport, affordable housing puts in the bare minimum it can get away with. So there will be space for three cycles here. Ridiculous. This is on a good public transport link and a good, flat safe cycling route. In addition, we have seen a substantial rise in the use of electric bikes with some commentators predicting that in three years, they will outstrip the sale of conventional commuting bikes. Where will these be charged? And how will they be kept secure?

Letter from gln to council dated May 17 2022

This document says the accommodation has a particular focus on serving the needs of women over 55. What is it? Seniors housing or over 55 women? The latter is in most desperate need but suddenly seems to have been discarded.

The letter says Landcom consulted closely with the community. This is untrue. We had one Zoom meeting during which no-one had their concerns or questions answered and there was zero interest in contributing to this low density, very friendly and connected community.

The document says that the refurbishment will reuse existing materials so reducing waste. Have inspections been done on this building since the floods? Local residents are battling a range of health hazards from rats to black mould. What state is the locked up QHC now in?

Landcom states that minimal residences are directly impacted by the development and it will have no more impact on neighbours than when it was QHC.

This is untrue.

QHC has no windows that overlook neighbouring properties.

QHC didn't operate at weekends or after 5.30 pm on weekdays.

QHC had a large car park which provided plenty of room for cars and bicycles.

QHC visitors did not create a huge flow of traffic through residential roads. This is a designated cycle route. Northern Beaches Council has a commitment to get more people moving by 2035. An increase in traffic will make an important section of the route (which services schools, Manly Beach and Warringah Mall) hazardous.

QHC did not contribute to flood impacts by replacing its car park with extra development.

QHC did not attempt to add between 35 and 60 new households to this low-density zone community.

Landcom says its development will "add to the vibrancy" of this neighbourhood

but their current proposal means the main addition will actually be more traffic, both from the residents themselves and visitors and service providers.

Adding vibrancy would see inter-generational occupancy and would entail consulting the community and providing community facilities which would encourage interaction between the new and existing communities - a coffee shop, for instance.

Instead we see the submission by Ruth Robertson who actually lives in affordable housing managed by a CHP. From her lived experience, it would seem reasonable to expect Landcom to disrupt our very connected, friendly, low-density neighbourhood.

<https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Common/Output/LoadAppPropDoc.ashx?id=%252bl9wl6nOezQV0A60ki4OEg%253d%253d>

In short, this development does not address the lack of affordable housing for key workers with families.

It is just poorly designed micro units that will return the maximum profit per square meter.

This from Novak real estate agency is an interesting insight into the attitude of affordable housing providers

<https://thenovakagency.com/2017/03/your-house-could-be-one/>

This attitude is why many experts fear that micro units actually drive up rental prices in larger, essential family rentals. The higher per square meter rents also drive up land prices and force genuine affordable housing developers out of the market.

This is a disappointing proposal. There is so much that is sustainable, practical and that has proven to work in the affordable housing space here and overseas - Community Land Trusts, Co-housing, Nightingale projects, Shared Equity housing to name but a few. Even the big banks such as NAB and ANZ are taking a responsible attitude to providing affordable housing and helping key workers get on the first rung of the housing ladder.

Manly has, as its local member, the Environmental Minister. I hope he will take more interest in this as the election approaches and encourage NSW to catch up with the other states. Victoria, WA, SA and Tasmania are all way ahead of NSW in offering affordable, sustainable housing and low-deposit loans or shared equity.

This development just appears to be looking to return the maximum profit to the state - to add to the \$18 million it made for NSW last year and the \$17 million paid in dividends.