
Sent: 14/12/2021 10:44:58 PM

Subject: PEX2018/0009 - Submission re amended planning proposal at 1294-1300 Pittwater Rd and 2-4 Albert St Narrabeen

Attachments: Submission re Planning Proposal PEX20180009_Johnson.pdf;

Attention: Felicity Shonk

Dear Felicity

Thank you for the opportunity to submit feedback on the amended planning proposal PEX2018/0009.

Please find attached our submission for the consideration of Council. We look forward to hearing from you in due course.

Thanks and regards

David and Helen Johnson
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Tel: 0407 208 766

Submission re Planning Proposal 1294-1300 Pittwater Road and 2-4 Albert Street Narrabeen 2101

Attention Felicity Shonk – Assessing Planner

14 December 2021

Dear Felicity,

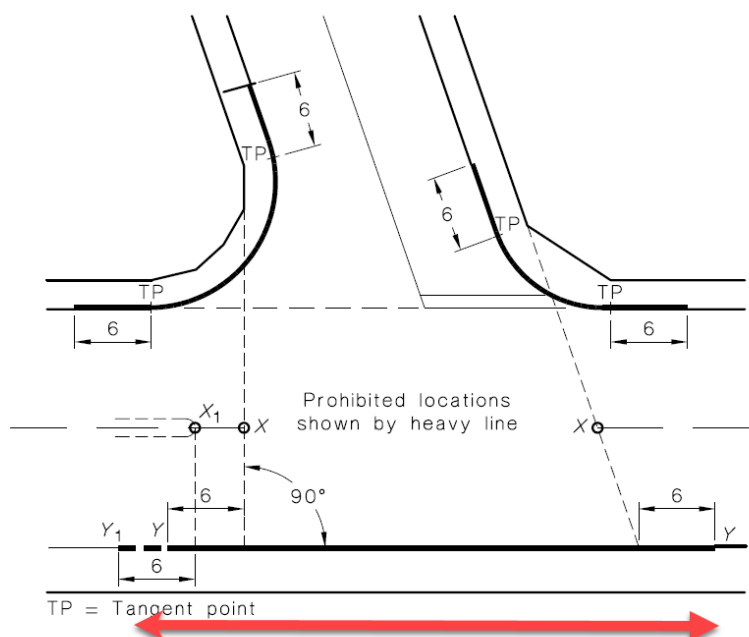
Thank you for the opportunity to make a submission to the planning proposal for the group of properties at the corner of Pittwater Road and Albert Street, Narrabeen. We appreciate and support the desire for Council to implement its Affordable Housing Scheme and make this project one of the initial projects in that scheme. We acknowledge that the site is in a prime location for this scheme offering excellent access to public transport, the town centre, the beach and lagoon. We also note that the site is the home of a very significant heritage item, that the applicant has gone to considerable lengths to preserve, which we applaud. However, there are a few ill-considered aspects of the proposal that need to be addressed, as detailed below.

Traffic:

The Traffic Report seems to understate the amount of traffic likely to be generated by the development. Most importantly, the Traffic Report is in serious and unresolvable conflict with the heritage preservation outcomes required by the Heritage Report. While the proposed development plans by GMU show the driveway to the significant basement and carpark outside the heritage curtilage of the house at 2 Albert Street, Figure 3.2 of the Traffic Report repositions the driveway (without any discussion of the conflict) immediately opposite Lagoon Street. This location appears to be within 1 metre of the Heritage house. The Report further discusses the proposed access location in Section 4.2, but fails to mention or comment on the unresolvable encroachment on the heritage item.

Secondly, the repositioned access location shown in Figure 3.2 of the Traffic Report is clearly within the PROHIBITED LOCATIONS FOR ACCESS DRIVEWAYS from Figure 3.1 of Australian Standard 2890.1:2004 (see below).

This is blatantly in contradiction with the statement in the Traffic Report that the basement carparking (which must obviously include the driveway) would be provided in accordance with AS2890.1:2004. While the basement may comply, the location of the entrance does not and cannot be made to comply without relocating it to Pittwater Road. Further east along Albert Street is obviously complicated with the narrow width of Albert Street. Clearly Albert Street is not an appropriate solution in any location.



NOTES:

- 1 Accesses to domestic driveways are excluded from the prohibition in respect of the kerb section marked Y-Y (see Clause 3.2.3(a)).
- 2 The points marked X_1 and X are respectively at the median end on a divided road and at the intersection of the main road centre-line and the extensions of the side road property lines shown as dotted lines, on an undivided road. On a divided road, dimension Y-Y extends to Point Y_1 .

DIMENSIONS IN METRES

FIGURE 3.1 PROHIBITED LOCATIONS OF ACCESS DRIVEWAYS

Reconsidering the evaluation criteria in Section 4.2 of the Traffic Report, the appropriate conclusion is obviously that the access driveway should be to Pittwater Road. The alleged impact on B-Line bus is spurious as the B-lines are very often moving into the other traffic lanes as they leave the bus stops (i.e. they are moving around the other buses stopped in front of them). Driveway access to the development on Pittwater Road would also have the advantage of the pedestrian crossings to the north providing a regular stop in the traffic flow to provide entry and exit, particularly as there will be increased numbers of pedestrians using the crossings to access the new development.

In addition, there would seem to be significant safety issues around the number of buses turning up Albert Street from Pittwater Road directly in front of the proposed entrance/exit to the basement carpark in Albert Street. With the driveway positioned originally as shown on the reports by GMU and the Heritage Report (see Traffic Report 3.1 Indicative Master Plan (prepared by GMU Urban Design & Architecture), there is a significant likelihood that vehicles will travel illegally into the driveway against the one-way direction of flow, i.e. vehicles will travel west against the turning buses illegally! Our observation of the buses turning into Albert Street off Pittwater Road confirms that nearly all of them utilize the full width of Albert Street for its full length to Lagoon Street – any proposed driveway anywhere along this section, including at the Lagoon Street intersection will be fraught with safety concerns as well as promoting illegal maneuvers.

What is proposed for garbage disposal/collection for the new development? While we appreciate that this is a planning proposal and waste disposal matters would normally be addressed at the Development Application stage, it must be recognized that the location of the driveway will (in all likelihood) be the location of the waste collection. With Albert Street as the proposed driveway, the waste vehicles will compromise the efficient operation of the bus routes terminating at Narrabeen (which then turn into Albert Street). Clearly this has not been thought through at this stage. It sounds like there has been “we will resolve this at the DA stage”, by then it is too late to get an effective, safe and low impact solution.

With the driveway located in Albert Street, there will be a significant increase in traffic to the east and then to the south along Ocean Street. While the traffic report may show minimal impact at the Albert St/Ocean St intersection, it is clear that the sight distance for vehicles turning out from Albert St is compromised. This will be exacerbated by the additional traffic. Clause 32 of the DCP must be deleted or amended to read Pittwater Road. We realise that this will require discussion with TNSW, but clearly that is the only acceptable safe, legal and Australian Standard compliant option.

It is acknowledged that TNSW will not prefer access onto Pittwater Road, however by banning parking along the frontage of the site, the intrusion of a single driveway could be negotiated successfully and must not be relegated to the too hard basket.

Heritage:

The Heritage report notes and reiterates the very high significance of the cottage at 2 Albert Street. It is essential that this is maintained and the 9m curtilage proposed on its eastern and western sides is absolutely preserved.

The development plans lodged with the planning proposal appear to support this curtilage, however as noted above, the Traffic Report suggests a relocation of the driveway to approximately 1m off the heritage building. This scheme has not been properly resolved and so is being set up to fail or compromise the heritage item.

DCP must include the heritage curtilage as required by the Heritage Report, including setbacks to the heritage item. This will require relocation of the driveway as noted above.

Views/streetscape/setbacks/Vista from Albert Street to Narrabeen Lake

At present there are moderately constrained views from Albert Street towards Narrabeen Lake. This proposal, importantly the proposed provision to allow for an additional height and usage of the third storey 3m setback from the lower building line in Building A, will further compromise the currently constrained views. The principle of view sharing is a really important consideration and this must be reflected in the DCP controls.

Building setbacks, particularly to Albert St for Building A, must be increased if the height of Building A is allowed to increase to 12m. The additional flood height required on commercial floors will, in combination with the allowed use of the additional 3m setback on the third storey, generate a building height at the 2m setback line of 2 commercial floors plus a compliant parapet for the balcony to a total in excess of alleged 8m above existing ground level. It is likely that this will be approximately 10.5m. This will be further compromised with dividing privacy walls between various balconies which will intrude into the 3m (3rd storey) setback area. These walls/screens are likely to

be in the order of a further 1.8m above third storey floor level. The resultant impact on building form, when viewed along Albert Street, is an 11m-12m high wall set only 2m off the front boundary to Albert Street. The same will occur on the Pittwater Road frontage, however, this is not constrained with the viewscape issue that is critical for Albert Street. The sharing of these views must be considered.

All of these will compromise the already constrained views from Albert St. Our strong recommendation is:

- increase the setback for the Albert Street frontage to 3m, (to align with the Heritage house setback and the remainder of Albert St) and to
- restrict the use of the additional 3m third storey setback so that balconies and dividing walls cannot intrude significantly into that space (require that any walls or balcony parapet/planter boxes do not intrude by more than 1.5m (1/2 the distance)) into the setback. This is most important for the area on the corner of Pittwater Road and Albert Street on Building A. Even if this additional restriction was only imposed on the area within 10m of the splay corner of Albert St/Pittwater Road it would be an improvement on the view sharing which is otherwise completely ignored.

We trust that Council will take our views into consideration in the determination of this planning proposal and ensure that the DCP is amended accordingly. We encourage Council to ensure that the proponent only submits plans that actually comply with the relevant AS and are fully compliant with the provisions of the DCP and the Heritage Report. At the moment, the plans don't even comply with their own documents.

We would appreciate the opportunity to address Council directly on this matter at the time it is reported for determination. Please advise us of the process. It has been long said that citizens should get involved in the strategic planning process and not wait for the DA to be submitted. We appreciate that Council has afforded us the opportunity this time. Our view is that the proposal must be rejected in its current form based on the issues raised above. Controls must be set so that when a DA is lodged it will comply and be supported without compromising safety, heritage, view sharing and the like and still achieve Council's affordable housing objectives.

Yours sincerely

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