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**Sent:** 31/01/2020 5:45:35 PM  
**Subject:** DA 2019/1260 - Hanstrum submission re DA for 27-29 North Avalon Road  
**Attachments:** Hanstrum submission 27-29 North Avalon Road Seniors Development.docx;

Dear Renee

Please find attached our submission concerning DA 2019/1260 for 27-29 North Avalon Road.  
We have spoken to Anna Williams who has granted an extension to the public comment period until 11 February 2020.

Regards

Barry and Susie Hanstrum

31/01/2020

Barry and Susie Hanstrum  
31 North Avalon Road  
Avalon Beach

## **Re: DA 2019/1260 – 27-29 North Avalon Road**

Attention: Renee Ezzy

Thank you for the opportunity to provide comment on the development proposal for 27-29 North Avalon Road, Avalon Beach. We are not averse to appropriate development of the site in a way that is sensitive to and in harmony with the neighbouring environment, and is compliant with relevant government policies. However, the development proposal as presented does not meet these fundamental requirements for the following reasons:

### **Inappropriate scale of development for our neighbourhood**

We couldn't possibly have imagined when we built our home in beautiful North Avalon in 2013 on a block of land zoned R2, low density residential, that one day in the future up to 25 or more people would live next door, that almost all of the trees would be removed from the block to enable construction of the buildings, and that the side of our house would be adjacent to a 15 bay car park. Such is the scale of the proposed development and the impact on our local neighbourhood.

We understand and accept the State Environmental Planning Policy (Housing for Seniors and People with a Disability) (SEPP HSPD) regulation that the building footprint can be up to 50% of the available land. We don't accept that crowding 10 units into these buildings is an appropriate scale of development for our neighbourhood.

### **Adverse impacts of clustered medium density developments on our neighbourhood**

There are already two seniors living facilities located close to the proposed development site. These are located at 7 North Avalon Road (6 units) approximately 200 metres from the proposed development, and the other being 'Drift' located at 4-6 Binburra Avenue (8 units comprising a mixture of 2 and 3 bedroom apartments) approximately 300 metres from the proposed development.

The application for a third development consisting of 10 dwellings conflicts with the intention of the Avalon Beach Development Control Plan to minimise the cumulative impact of seniors housing developments. As described in the submission by Clacher (29 North Avalon Road), the ratio of seniors housing units to residential houses in the area around the North Avalon shops would increase to around 1:1.6 which is an unacceptably high density ratio in what is primarily a low-density residential area.

The proposed scale of this development and the clustering of seniors housing will fundamentally alter the character of the North Avalon neighbourhood and set a

precedent for clustered medium density developments in other Avalon Beach neighbourhoods.

### **Unsafe pedestrian links to public transport and onerous access to essential facilities and services**

The location of the development does not provide either safe or convenient access to essential facilities and services, and is therefore contrary to the intention of SEPP HSPD Clause 26, which states that the public transport service be located at “a distance of not more than 400 metres from the site”, and that it is to be reached by a “suitable access pathway”. Furthermore, the public transport service is required to take the residents to a location which is no more than 400 metres from the essential services.

The journey to the medical centre in Avalon Village and the return trip to the site is a significant excursion for elderly people and people with a disability. In order for a resident to access medical services by public transport, they would need to travel close to 400 metres to the bus stop on Barrenjoey Road, alight the bus at the Avalon Parade traffic lights, then travel another 400 metres to the main medical centre located at the western end of Avalon Village at 54 Avalon Parade. Both of these distances are at the outer limit of the travel distances, as specified by SEPP HSPD Clause 26.

For the return journey, the bus stop on the western side of Barrenjoey Road is located 435 metres from the pathway leading out of the development site. Residents whose dwellings are at the rear of the site would need to walk an extra 30 metres or so to the front of the site. Therefore, some residents would be required to travel around 465 metres to make the return journey. This clearly exceeds the 400 metres maximum access distance to public transport as required by SEPP HSPD.

In addition, a “suitable access pathway” as defined by SEPP HSPD Clause 26 is a “sealed footpath” and other travel path which can be used **safely** by “an electric wheelchair, motorised cart or the like”. In a similar vein, SEPP HSPD Clause 38 states that there should be “obvious and safe” pedestrian access from the location to public transport or local services.

The designated return bus route from Avalon Village does not provide a “suitable access footpath” that is safe for use by a pedestrian nor electric wheelchair, motorised cart or similar. The Development Application recognises the safety need to construct a footpath on the southern side of North Avalon Road so that residents can access the existing crosswalk near the North Avalon shops on the way to the bus stop on Barrenjoey Road. However; there is no attempt to address serious safety concerns of a return trip to the location which would require a resident to cross Barrenjoey Road after alighting the bus. This is a very busy road and a potentially dangerous crossing at the best of times. The so-called island refuge can be a precarious stopping point when confronted with buses and other large vehicles traversing the roadway at speed.

## **Integration of existing trees in the design and landscaping plans**

The Avalon Beach Development Control Plan states that “existing and new vegetation, including canopy trees, will be integrated with the development”. Further, it says that a key principle behind new development is that there should be “houses amongst the trees and not trees amongst the houses”. The proposed development pays little regard to this objective by removing almost all the existing trees on the site, effectively destroying the established, leafy appearance of the site.

The Arborist’s report assessed the condition of 59 trees in the development proposal. Of these, 48 trees were located on the development site (11 were on the council verge). Of these 48 trees, the assessment identified 20 trees as being prescribed LGA protected trees. Of these 20 trees, the arborist identified 7 trees that had low retention value that could be removed, leaving 13 protected tree species in reasonable health on the site. In the landscaping plan, 2 of these trees (1 each located in the setbacks at the front and rear) have been retained, and a third has been relocated on the block. Therefore, there are 10 protected native tree species located within the building footprint designated for removal. Some of these are mature canopy trees.

The landscape plans provided, which include the building design plans, are dated 3 May 2019, yet the arborist inspection was not carried out until 7 June 2019. In order to effectively retain and integrate the protected trees into the design plans the arborist report would need to have been completed **before** the building and landscape plans were prepared.

While we appreciate the intent of the landscape plan to screen the development from neighbouring properties and include several large native trees at the front and rear of the buildings, the approach is not one where the existing vegetation has been integrated with the development. We strongly disagree with the assertion contained in the Statement of Environmental Effects (p48) that “the proposal has been carefully designed to minimise the impact of the development on the natural landform and vegetation.”

The arborist report states that the condition of Tree 49, (a high value 14 x 14 metre remnant Cheese Tree located at the rear of 27 North Avalon Road), and Tree 25, a 17 x 15 metre Swamp Mahogany are marked for removal, but that the condition of the trees would benefit from further investigation. We ask that Council further investigate the condition of these trees and if favourable, that they be retained and integrated into the proposed landscape plan. We also request that the health of Tree 17, a 20 x 22 metre Spotted Gum located in the front setback of the property be assessed further.

To conclude our submission, we reiterate our strong objections that the development does not meet the SEPP HSPD requirement that the location provides safe and convenient access to essential services and facilities. It disregards the intention for new housing developments to retain and integrate existing trees into the building design, and the large number of units and scale of the development being proposed shows little consideration for the impact of clustered medium density housing on the character of the local neighbourhood.

We look forward to meeting with Council and the developers to discuss these matters further.

Barry and Susie Hanstrum