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Subject: Online Submission

RE: DA2020/0205 - 18 Alexander Street COLLAROY NSW 2097

Re: DA - 18 Alexander St, Collaroy. Lot 9 DP6984 Please consider the following when assessing this application. I understand that a Boarding house is an allowable proposal in a low density residential area R2 which is the current zoning for Lot 9 DP6984 as long as other requirements under the State Environmental Planning Policy (Affordable Housing) 2009 are met and Council approval is granted. It is unfortunate that the applicant has not sort to communicate or engage with the local community in any way prior to the DA being lodged. The Collaroy community has a long history of supporting and encouraging a diverse community and embracing initiatives such as the youth hostel and the disabled community and protecting and sharing the local environment. The need for affordable housing is evident with the difficulties encountered by groups such as essential workers however it needs to be located in settings that ensure that it also benefits the broader community and does not unnecessarily impose upon existing communities purely for the financial gain of the developer who is not part of the community. At face value this proposal therefore appears to seek to maximize the commercial benefit to the applicant with complete disregard or respect for the current community in Alexander street, many of whom have lived here for decades. Our main concerns are as follows:

1. Off-street Parking - 6 car park spaces is not adequate for a development of this scale and occupancy with 11 individual units within the proposed boarding house; there is the potential for 22 adult occupants and an unspecified number of children to be housed on the site - regardless of the consultant's report on additional traffic flow and compliance the reality is there is already congestion and parking issues on this street and this proposal will only exacerbate this situation. As the applicant also seeks to develop the adjacent block as a boarding house, the issue of traffic is compounded and it would be more appropriate to consider the cumulative effects of both proposed developments when undertaking a traffic impact analysis. Traffic management on the street is already poor as Council and Northern Beaches Local Area Police command are no doubt aware with numerous major traffic incidents due in part to the narrow carriageway, steep inclement as the street rises to the west and speeding traffic which already make ingress and egress to existing driveways hazardous. The consultant's report "Traffic and Parking Assessment" is also incorrect stating that there are existing speed humps - there are no raised humps in Alexander street only painted markings which would be better described as passive traffic calming devices.

1. Overall building footprint is large with the the proposed landscaped area approximating to 23.5% of the site. The current DCP for the area indicates that 40% is required and there appears to be limited justification as to why this non-compliance is acceptable. Particularly as the site is in the vicinity of one of the major overland water flow pathways from the gulley at the back and adjacent Collaroy plateau. The scale of the development and that proposed for the adjacent site raises concerns about how the development will impede flow. It is noted that the proponent's flood study report indicates no impact with the proposed development however it also states "This study has shown that some part of the overland flooding from upstream catchment enters the site via western boundary around the north-west corner, and leaves the site via northern/front boundary" so there is some uncertainty with the consultant's conclusion of no impact. The current and required potential area for water percolation and retention is proposed to be significantly reduced this will result in water being shed from the site at a greater rate and over a shorter time period than current resulting in an enhanced impact on down gradient areas such as sheeting of water upon Alexander Street and flow to adjacent properties. Noting that during extreme rainfall events there have been numerous flood events adjacent to the cinema and shop complex on the eastern end of Alexander street. As the applicant also seeks to develop the adjacent

block as a boarding house with a similar reduction in landscaped areas, issues of water retention, percolation and overland flow become compounded and it would be more appropriate to consider the cumulative effects of both proposals when undertaking any rational impact analysis.

2. The removal of a significant number of mature trees and reduction in landscaped areas in the proposal is a significant habitat loss to the area. The site is adjacent to a significant area of natural habitat that connects Collaroy Plateau and the escarpment to the coastal plain. There are numerous reports of protected, endangered and vulnerable species in the area including but not limited to the eastern bandicoot and powerful owl <https://www.environment.nsw.gov.au/threatenedspeciesapp/>. We contest the applicant's assertion that this proposal does not impact threatened species. This is exacerbated by the applicant's proposal to develop the adjacent block as a similar proposal. The proposal will impact local biodiversity.

3. The proposed boarding house is to be built on top of an existing large diameter (750 mm) stormwater drain and associated easement which will need to be adequately protected during building works. There appears to be limited consideration for future access to this infrastructure in the proposal compared to available access with the current built form.

4. The scale of the development is very large proportional to site size and is not in keeping with the existing houses in the street nor the residential low density built form and extensive garden areas of properties proximal to this proposed commercial boarding house. The applicant's consultant report "Statement of Environmental Effects Lot 9, 18 Alexander Street" states that the proposed development would be in harmony with the building around it and the physical impacts on surrounding developments is compatible. We contest these statements as this is a commercial, high density residential development incompatible with the surrounding single family, private dwellings. The photos of the local area in the same report are disingenuous in that they fail to adequately characterize the most impacted properties, for instance by omitting the street frontage of 11 Alexander Street which is opposite the proposal while including photos of multi-dwelling properties at greater distance from the proposed development site.

5. If this boarding house is approved it will set a precedent such as for the adjacent Lot which is also proposed to be developed as a boarding house of similar scale. To all intents it is a backdoor strategy to get high density, commercial developments in a low density, residentially zoned area. Both proposals should be considered together as it is the cumulative effects rather than the individual impacts from one development that the local community will be subjected to, noting also that is the same developer for both proposals.

If Council considers the DA has merit it would be appreciated if it consider the following to limit impacts on neighbours and the broader Collaroy community:

1. The proposed common area and balcony look directly over properties such as 9, 11, 13 and 15 Alexander street. The usage, elevation and sound projection from these areas will result in reduced amenity and privacy for these and other neighbouring properties and is inadequately addressed in proponent's reports such as the facilities proposed management plan.
2. The managers unit should be near the front and entry doorway of the facility so there is greater supervision of who can enter the building and activities in common areas.
3. Additional carparking for residents and visitors is required to limit demand on already limited on street parking.
4. It is intended to have one unit for a resident with disabilities which is laudable - however there is no indication that the retained swimming pool will have suitable disabled access and is therefore discriminatory. In addition, Council should clarify to its satisfaction, whether an access ramp to the street frontage is required under the Building Code of Australia for wheelchair access as this a is a new commercial development and the proponent's access report is opaque.
5. Conditions requiring that protection and access for the stormwater easement and infrastructure be

included in consent.

6. That the proposal be amended to comply with the DCP requirement for landscaped area of 40%