Sent:	31/01/2022 2:47:17 PM
Subject:	BRCA submission amended plans
Attachments:	BRCA submission amended plans.docx;

Please find attached Belrose Rural Community Associations Submission for DA2021/1039 Amended Plans
16 Wyatt Ave Belrose
Demolition of a single detached Dwelling and Construction of a Boarding Houses with 55 rooms housing 110 people

Kind Regards Dr Conny Harris, President BRCA





belroserural community association@hotmail.com

24 January 2022

Northern Beaches Council Attention: Adam Mitchell Principal Planner

DA2021/1039 Amended Plans

<u>16 Wyatt Ave Belrose</u> <u>Demolition of a single detached Dwelling and Construction of a</u> <u>Boarding Houses with 55 rooms housing 110 people</u>

Dear Sir,

Thank you for the opportunity to make a submission on this unacceptable proposal.

Overdevelopment

The Proposal consists of two large buildings with only 35 car parking spaces and very little bushland existing or proposed over this steep property with an area of 0.9345ha. The proposal is an overdevelopment of the site that will result on high impacts on the site, the surrounding bushland and impacts on the existing residents in this quiet residential neighbourhood consisting of single detached dwellings.

Design and Sustainability Advisory Panel

The minutes of the design and Sustainability Panel show that the original plans were completely unacceptable, yet the amended plans do not address many of the issues raised by the Panel. The Panel consider that the lower building at the rear of the property should be deleted from the proposed development. The amended plans still show this lower building set in an area that floods and is close to bushland which is in a High Bush Fire risk zone.

Out of Character with the Local Neighbourhood

This proposal with 55 rooms in two large buildings will provide for 108 lodgers and 2 in the manager's unit; a total of 110 people.

This large scale bulky development replaces a single detached dwelling and will significantly increase the density of people living in this section of Wyatt Ave and impact on the quiet residential amenity of the neighbourhood.

The proposal is inappropriate in this local neighbourhood of single detached dwellings.

High Bush Fire Risk

The proposal consists of two large buildings, one near Wyatt Ave and one at the rear near bushland.

The property is bushfire prone land and the large building at the rear is very close to substantial bushland.

Bushfires have often occurred in this area. The land is north west sloping and is exposed to the west through to the Blue Mountains; this results in strong westerly winds which cause bush fires to proceed at a very fast rate with glowing embers blown well ahead of the fire front. This will result in a very high fire risk to people in this development.

It is unreasonable and inappropriate to place so many people in this high Bush Fire risk area.

Impact and Intensity

The proposal will be a high Impact and High Intensity development.

The Planning controls for this property are contained in Locality C8 north Belrose WLEP2000 Where the desired future Character Statement states in part,' Development will be liited to new detached style housing conforming with the housing density standards set ou below and low intensity, low impact uses.

The existing developments in Wyatt Ave near the location of this property are single detached dwellings with very low impact and intensity.

This proposal will have much more impacts and intensity when compared to the existing impacts and intensity from the existing single detached dwellings.

This property is on the Northern side of Wyatt Ave in Locality C8 WLEP2000. The properties on the side of Wyatt Ave are zoned R2 low density in WLEP2011.

In amending the SEPP for Affordable Rental Housing applying to Boarding Houses the Minister for Planning acknowledged the many submissions form Councils and the community and stated that as **these developments are High Intensity developments**, the SEPP will be amended in low density R2 zones to only permit a maximum of 12 rooms per lot. This should also apply to the subject lot as the planning density is lower than R2.

The large Bulk and Scale of the proposal will be a high impact in this low density neighbourhood with single detached dwellings.

The proposal only provides 35 Car Parking spaces onsite for 110 people.

The proposal acknowledges that there is some on street parking available so the applicant recognises that the onsite parking in insufficient.

The applicant is applying the requirements in the SEPP for Affordable Rental Housing, however this SEPP does not apply to Locality C8; therefore this reduced parking requirement should not apply to this proposal.

The proposed development will provide housing similar to one bed room units where the car parking requirements in the schedule of WLEP2000 require one space for each unit and some visitor spaces.

Insufficient onsite parking will cause a high impact on the local residents in Wyatt Ave.

The large number of people living on this site in comparison to all other single detached dwellings in this neighbourhood will result in a high intensity of activities and severely impact the quiet residential amenity of this neighbourhood.

Landscaping

The landscaping plan shows that most of the site will be grass/lawn. There are only some very small areas where scrubs and trees are proposed.

The C8 North Belrose Locality mainly consists of native bushland over public and private properties.

It is essential that bushland be retained on this property and cleared areas revegetated to ensure integration with the surrounding bushland.

It is essential that bushland buffer areas be provided between urban development to maintain wild life corridors and to reduce the urban impacts on the surrounding native bushland areas which increases the importance of providing more bushland on this property.

The planning controls for this property require at least 50% of the site area to be retained as bushland and/or revegetated with local native species.

This proposed landscaping is not in accordance with the planning controls and is unacceptable in this bushland area.

Storm Water Drainage

The proposed drainage facilities will not eliminate the flooding of the lower area of this property and cause unacceptable risks to the lodgers in the lower building,

This lower area of this property often floods during major storms.

It is unacceptable to provide residential living in an area subject to flooding.

Impacts on Bushland Habitat

This proposed large residential development with 110 people will have substantial increased 'living activities' which will have negative impacts for the bushland habitat caused by substantially increased noise and light pollution as well as nutrient rich runoff and distribution of exotic species. This proposal does not protect the environmental landscape or enhance the bushland or waterways.

This proposal does not compliment or enhance the surrounding bushland and will cause substantial negative impacts to the native wildlife.

Pedestrian Access to the proposed lower building

The lower building is at the rear of the property with pedestrian over a very steep area with many steps.

This does not provide accessible pedestrian access to a development that is proposed to rely on lodgers using public transport.

Conclusion

This proposed development is unacceptable in this low density residential neighbourhood with single detached dwellings and surrounding bushland.

The proposal is completely out of character with the neighbourhood and will cause high impacts and high intensity impacts on the existing residents in this neighbourhood.

Yours Sincerely

Conny Harris President, Belrose Rural Community Association