

15th December 2020

**Attention: Mr Phil Lane, Principal Planner
Northern Beaches Council**

Dear Mr Lane,

I am writing a further submission in relation to DA2020/1097 following the release of the Development Application Assessment Report.

I have identified a number of serious concerns relating to this report and I have addressed each of these concerns below.

Justification of the proposal

On page two, the report argues that there is a:

“strong demand for sportsground use; more demand than there is current capacity”.

If this is the case, then why does the report not include any information supporting its broad claim? The report is 35 pages in length, yet it does not include any information as to which organisations are requesting to make use of the Reserve after dark; on which evenings the organisations would like to use the Reserve; or for how long they would require its use.

Traffic congestion

I refer to page 10 of the report that states that based on observations by the author of the report:

“Campbell Parade does become congested due to its narrow width, particularly when cars are parked on both sides of the road, and this is exacerbated by the signalised intersection at Condamine Street which appears to sometimes limit the volume of traffic leaving the area. It is also the author’s observation that at times there can be traffic conflicts relating to vehicles reversing out of parking spaces into Campbell Parade and vehicles negotiating the intersection of Quirk Road and Campbell Parade”.

Given that council has received 27 objections (out of a total of 39 submissions), the majority of which expressed concerns about traffic and parking, and the fact that the author of the report clearly acknowledges traffic and parking congestion, why is the report not accompanied by a traffic and parking report?

Surely, a traffic and parking report would help to clarify the feasibility of increasing the evening use of the Reserve by up to several hours.

Furthermore, given the hundreds of residents live in the street and the fact that it’s located next to a high school, one would think that a traffic and parking report would be essential in determining the potential likelihood of injury or fatality.

The report goes on to claim:

“The proposal does not increase the intensity of the use of the playing fields and consequently it does not result in an increase in the volume of traffic”

If the proposal does not increase the intensity of the use of the playing fields, then why is there an application to extend their use by installing flood lighting? The report dubiously claims that increase in intensity does not occur because:

“It does however result in these impacts occurring over a greater period of time by increasing the time that the playing fields are used, extending the use into the evenings particularly during winter”.

Is this truly the case that participants will arrive at the current usage times (prior to dark, which is approximately 5pm in winter) and either compete or train continuously until as late as 8.45pm on Mondays to Thursdays and 9pm on Fridays? I have never heard of a local sporting team training for this length of time. I have good knowledge of this having played soccer for many years and grade level cricket. Nor are sports such as soccer, touch football or rugby league played for this length of time. Cricket is a sport that does extend for several hours, but only international sporting fixtures (i.e., the Australian Cricket Team) play or train under artificial light.

The non-sensical nature of this argument means one of two things: (1) the need for increased sporting facilities at night is not as necessary as the report argues and/or (2) there is actually the intention of changeover periods where one team leaves and another team arrives. Clearly, this would add to the congestion acknowledged by the author.

For a visual demonstration of this I refer to my submission on the 3rd November 2020 that includes a photo taken with my mobile phone that depicts the significant traffic congestion during a trial of touch football on Friday afternoons. Vehicles can be seen backed-up and double parking.

Parking

On page 11, the report states:

“The situation with regards to parking is similar to the situation with regards to traffic, described above. The proposal will not result in an intensification of the use of the playing fields but will increase the length of time during which they are used”

Yes, I agree the situation with regards to parking is similar to the situation with regards to traffic described above. And yes, the same concerns relating to intensification of use of the oval and its impact on traffic congestion and safety apply to parking problems.

In relation to parking, the report further states:

“On street parking is available on Campbell Parade adjacent to the site. There are forty marked spaces at 90° to the carriageway. There is also parallel parking on Campbell Parade opposite the playing fields (in front of the school)”

This is correct and as noted in the report despite there being forty marked spaces opposite the oval and the school, the vast majority of these car parks are utilised by the high school and local residents.

In fact, the aerial photo in the report on page four reveals almost all of the vehicle bays being utilised despite not a single obvious person anywhere on the Reserve.

Lighting

Many residents have expressed concerns about light spill from the proposed eight light towers. The report attempts to address this by stating that their assessment by Art + Science (Lighting and Electrical Consultants) meets Australian Standards for obtrusive and outdoor lighting:

“The proposal results in a maximum vertical illuminance of 0.9 lux, occurring at 2A Campbell Parade, and complies comfortably with this criterion”.

However, the report does not indicate whether the proposal meets Australian Standards in relation to other residential blocks such as 27 Campbell Pde, which is directly opposite the oval. Nor is it clear whether the illuminance measures or estimations were taken / made at ground level or on the third level of the relevant apartment blocks that look directly onto the oval.

Noise

The report acknowledges that concerns have been raised about the increased use of the playing fields in the evening facilitated by the lighting. The report also acknowledges that residents will be able to hear talking, shouting and the use of whistles.

The report claims that:

“The proposed hours of use facilitated by the proposed sportsfield lighting are considered to be reasonable and unlikely to unreasonably interfere with sleep of nearby residents”.

The report does not indicate how the author arrived at this conclusion.

As Clinical Psychologist I can tell you that all children aged 5 – 11 years of age should have between 9 – 11 hours sleep per night. I refer the author to the Raising Children website – a well-respected Australian Parenting website – that suggests that primary school age children should go to bed around 7 to 7.30pm. Clearly this time is well before the proposed use of Passmore Reserve. <https://raisingchildren.net.au/pre-teens/healthy-lifestyle/sleep/school-age-sleep>

Site History

The report refers to a previous application for installation of lighting at Passmore Reserve - DA2009/1658 – that was refused on the 28th April 2010. This application proposed five light poles unlike the current application that proposes eight light poles. The application was reportedly independently assessed and recommended for approval but it was determined by the Warringah Development Assessment Panel (WDAP) and refused.

The current report does not explain why the previous application was refused. Nor does it explain how it has addressed the concerns raised by the WDAP that were the basis of their refusal in 2010.

In his submission on the 24th September 2020, Joe Maccioni, attached a copy of the WDAP report (see page 16).

The WDAP panel recommended refusal of the application for the following reasons:

1. The unsatisfactory impact on residential amenity
2. Insufficient information provided in relation to the manner in which the sports field will be operated once the lights have been installed.
3. The applicant did not provide an operational management plan which deals with the manner in which unsatisfactory night time sporting activity will be managed to prevent negative impacts on nearby residents.

As outlined above, it is clear that each of these three issues that were the basis of the WDAP's refusal to support the application in 2010 have not been adequately addressed in DA2020/1097.

Summary

In summary, I strongly object to DA2020/1097. The current application has not attempted to address the concerns identified by the WDAP in 2010 regarding DA2009/1658 that resulted in refusal. DA2020/1097 states that it gives “no determining weight” to the impact on residential amenity despite failing to undertake a traffic and congestion report, providing limited assessment of lighting spill and making broad unsubstantiated statements about interference on sleep. Furthermore, it makes contradictory statements about increasing demand for sporting fields (without any further evidence of this) and yet argues that the proposal does not increase intensity of use.

Justin Doran
Resident of Campbell Pde
Manly Vale