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**Sent:** 28/01/2021 4:38:57 PM  
**Subject:** Attention: Anne-Marie Young - Submission re DA2020/1597.pdf  
**Attachments:** Submission re DA2020-1597.pdf;

Dear Anne-Marie,

I am a resident of Pacific Parade, Dee Why and wish to submit the attached objection to the proposed development of a boarding house at 67 Pacific Parade (DA2020/1597).

Kind Regards,  
S A Phillips

Anne-Marie Young  
Principal Planner  
Northern Beaches Council  
PO Box 82  
MANLY NSW 1655

10/64-66 Pacific Parade  
DEE WHY NSW 2099

27 January 2021

**Re: Development application DA2020/1597 - 67 Pacific Parade, Dee Why**

Dear Anne-Marie,

I am the owner of 10/64-66 Pacific Parade, Dee Why, located opposite the proposed development at 67 Pacific Parade (DA2020/1597). I am lodging an objection to the proposed development on a number of grounds. It is not suitable for the site in question and would constitute significant overdevelopment of the site. The proposed development has a number of building compliance issues and would cause significant issues for existing residents in the area.

The *Urban Design Referral response* for this development dated 6 January 2021 does not support the proposed development and identifies a number of issues with the proposal including:

1. The proposed boarding house is a big increase in unit density and does not comply with built form controls designed to protect amenities to neighbouring residences.
2. The proposed development is not compliant with the requirements for side setbacks or the building envelope and, as such, would compromise amenities to neighbouring residences.
3. The proposed basement excavation of approximately 3.5 storeys is of concern on such a narrow site, particularly as contiguous bore piles have not been indicated on the drawings and would encroach on the proposed 2 metre setback (which is already less than the 4.5 metres required) and pose a threat of damage to the neighbouring property.
4. The proposed common rooms lack access to sufficient sunlight.
5. The proposed soft landscape cover of approximately 39% is inadequate to soften the impact of the significant increase in density of units.

I object to the proposed boarding house development (DA2020/1597) on the following grounds.

**Character and amenity**

The proposed development is not compatible with the current residential density or character of apartment blocks in this area. The number of units proposed is vastly in excess of neighbouring buildings on blocks of similar size and totally inappropriate for the 700 metre square block. An assessment of apartment blocks on similar size land parcels in close proximity to the proposed site indicates that a block of this size would typically have an average of nine apartments with balconies. A façade of repetitive window boxes without balconies is out of character with neighbouring properties, as is a street-facing rooftop common area. The proposed development is not in harmony with the natural environment and would have an adverse effect on the streetscape, character and amenity of the area. The arborist's report states that most of the trees currently on the site would be removed and replaced, including the only mature tree native to the area. As the site is currently characterised by moderately dense foliage, the proposed development would reduce the amount of vegetation in the street and its potential to offset the increase in carbon emissions that a development of such increased occupancy density would generate.

## **Noise**

The acoustic engineer's report shows that the proposed development is predicted to generate noise levels above the acceptable limit at four different locations close to adjoining properties. In section 4.1.2 of the report, it states that, "ambient noise in the area is dominated by the natural environment, predominantly local fauna and local residential based noise (such as lawn mowing, music etc)". Mechanical equipment operation and common areas in the proposed development are predicted to exceed acceptable noise levels. The common areas and open terrace are expected to be the primary source of excessive noise. Such areas are not typical in existing buildings in this part of Dee Why and would alter the character of the area and significantly increase noise pollution. Some controls for noise management, such as limiting the number of residents in communal areas, closing external windows and doors at night, and not allowing amplified music, have been proposed. Such controls are not feasible; however, as they would be extremely difficult to enforce and create monitoring issues for the on-site manager, local residents, council and police.

## **Public safety**

The proposed development raises a number of concerns for public safety, particularly road traffic and pedestrian safety with an increase in numbers beyond what is normally attributed to similar sized residential blocks in this area. The nature of the development being short-term housing would only add to the issues with traffic and population increase in an already densely populated area. It is acknowledged in state government and council reports that Dee Why is one of the suburbs which has borne the largest increase in development on the Northern Beaches in recent years. The suburb is now at capacity and any further development that would increase the density of housing beyond the current level typical of the land area should not be approved.

## **Traffic issues**

The location of the proposed development close to the corner of The Crescent and approximately 170 metres from the roundabout linking Pacific Parade to Sturdee Parade has the potential to cause bottlenecks with increased traffic, particularly during peak hours and waste collection times. The entry to the proposed development is a single lane to basement parking with a traffic light setup which would necessitate queueing when more than one vehicle was entering or leaving the premises. A similar situation exists in another unit block in Sturdee Parade where vehicles frequently attempt to overtake in different directions at the same time because of queueing at the entry to the premises, putting both pedestrians and vehicles at risk.

## **Parking**

Available street parking in Pacific Parade and The Crescent is always at a premium and is now vastly inadequate to the needs of existing residents and their visitors. The proposed development with its limited onsite parking and no visitor car spaces would add significantly to road congestion and parking issues. The *Stanbury Traffic Planning* report states that there are a number of parking spaces available on streets within close proximity to the proposed development. These parking spaces are rarely vacant, particularly in the afternoon or evening, resulting in many residents resorting to parking illegally or in contravention of strata bylaws. The proposed development does not clearly identify that it has a larger driveway than the existing property, which will in fact reduce the number of on-street parking spaces. This would exacerbate an already difficult situation with many residents unable to find on-street parking within 200 metres of their home.

It appears that observations for the *Stanbury Traffic Planning* report were made during the morning peak time but the information and recommendations contained in this report are completely at odds with my observations and experiences as a resident of the past seven years. Attached photographs (Appendix 1) show Pacific Parade traffic and parking in the vicinity of the proposed development on two separate occasions at different times of the day in the last fortnight. It should be noted that

these photographs were taken during school holidays when traffic is typically lighter in peak hours. It appears that the Stanbury report was produced during a time when many residents were working from home due to COVID-19 and therefore traffic conditions during peak hours were much lighter than is typical.

### **Waste collection**

The proposed development has 9 general waste bins and 12 recycling bins, significantly more than the number at neighbouring properties. The current collection times for waste removal and recycling services in Pacific Parade, Dee Why are 5:30 am and 7:30 am on Fridays. The earlier collection time, about which some residents have already complained, is disruptive at such an early hour and would be worse with a larger number of bins to be collected. The later collection time extends for a longer period. Additional bins to be emptied at this time would not only add to noise pollution but create a dangerous traffic bottleneck close to the corner of The Crescent with large waste removal vehicles blocking driveways, creating significant delays and traffic flow issues during the morning peak time.

### **Affordable housing and built form requirements**

The *Statement of Environmental Effects* document for DA2020/1597 notes that the proposal seeks a number of variations to building requirements. One such variation is to the boundary setback control of 4.5 metres on both the eastern and western sides. The proposed site at 67 Pacific Parade has a width of 15.24 metres. The *Statement of Environmental Effects* notes that, "To comply with a setback of 4.5 metres to each side boundary would result in a very long, narrow building, with narrow rooms which would be(sic) render the development unviable." This statement makes is very clear that the proposed development is not suited to a site of this size. The proposed development with 2 metre setbacks is not compliant with the required distance and will not provide adequate separation between buildings on either side to ensure a reasonable level of privacy, amenity and solar access. The *Statement of Environmental Effects* also notes that the proposed building will breach the building envelope in parts of the western and eastern elevation.

There is some question as to whether the proposal is in fact compliant with state government requirements for affordable housing as the total area of each of the three loft style apartments (301, 302 and 303) exceeds the maximum 25 m<sup>2</sup> allowed for affordable housing developments.

The distance of the proposed development from bus stops with hourly services between 6 am and 9 pm Monday to Friday and 8 am to 6 pm on weekends is also not compliant with New South Wales government requirements for affordable housing. The closest bus stop, located on Pacific Parade, is approximately 55 metres away. This stop has frequent services to and from the city during peak hours on weekdays only and no services on weekends or at other times. The 177X bus service to the city runs between 6:19 am and 8:35 am Monday to Friday with return services from the city arriving between 5:15 pm and 8:12 pm. The closest bus stop with hourly services is not within 400 metres of the proposed site, and the distance from the B line bus stop on the corner of Howard Avenue and Pittwater Road, which has frequent services to the city and Manly, is approximately 650 metres. The *Statement of Environmental Effects* claims that the 159 bus to Manly runs from the two closest bus stops to the proposed development site in Pacific Parade. This service has been discontinued.

The *Statement of Environmental Effects* claims that, "Based on forecast growth within the key markets generating demand for co-living dwellings, there is need for an average of 210 additional rooms/apartments per annum from 2020 to 2030." This document references the *Warringah Local Environmental Plan 2011* and the *Warringah Development Control Plan 2011* which are both ten years old and do not reflect changes which have occurred since their publication. It is noted in the recent *Draft Northern Beaches Local Housing Strategy*, currently open for community feedback, that additional boarding houses are not required to meet housing needs in this area at this time.

Since 2016, an additional 241 boarding house rooms have entered operation on the Northern Beaches. The current prediction based on population projections, as outlined in the *Draft Northern Beaches Local Housing Strategy*, is that the Northern Beaches would only need an additional 102 single boarding house rooms to meet the demands for this type of dwelling by 2036. There have been many recent applications and approvals for boarding houses in this area, including sites at May Road, Pittwater Road, Fisher Road, Lewis Street, Redman Road and Harbord Road, Dee Why, all less than one kilometre from the proposed site in Pacific Parade. This constitutes overdevelopment of this type of accommodation, and any further approvals of boarding house developments in Dee Why would be likely to result in a significant change to the character of the area. The proposed 'new generation boarding houses' are designed for single people and couples who are key workers in need of affordable housing. The majority of residents on lower incomes in Dee Why are families with young children for whom this type of boarding house accommodation would be unsuitable. The report predicts that this population trend is likely to continue. As such, the proposed development does not meet the current or future needs of the area and should be rejected.

I am not opposed to development of the site at 67 Pacific Parade or to an increase in affordable housing on suitable large sites on the Northern Beaches; however, the land at 67 Pacific Parade, Dee Why is not suited to a development of more than 10 units based on all available evidence. For this reason, I urge council to carefully consider all the available evidence and the views of existing residents and to reject this development proposal.

Kind Regards,

S A Phillips

## Appendix 1



Vehicles travelling in eastbound direction on Pacific Parade during evening peak time  
(18 January 5:44 pm)



Car braking as vehicle enters driveway on eastern side of proposed development site  
(18 January 6:04 pm)



Westbound traffic on Pacific Parade and lack of available on-street parking at non-peak time  
(19 January 12:50 pm)