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RE: DA2021/0008 - 14 Ponsonby Parade SEAFORTH NSW 2092

OBJECTION TO DA 2021/0008
12/14 Ponsonby Pde, Seaforth, NSW

Submitted by: Michael Julian, 22 Ponsonby Parade, Seaforth, NSW
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1) The development application fails to meet the 'location and access to facilities' requirements outlined in the NSW State Environmental Planning Policy (Housing for Seniors) 2004 (SEPP) * which requires that facilities, services and transport be located within 400 metres of the development.

a) Several of the required facilities are more than 1 kilometre from the development:
Bank services, Community services, recreation facilities, general medical practitioner

b) The other required facilities are located MORE THAN 400 metres from the development:
Shops and some retail /commercial services
(Please note that the SEPP requirement of services within 400 metres is NOT an estimate. The 400 metre requirement is fixed).

c) Public transport services are located more than 500 metres from the development.
NSW Transport has withdrawn all but 1 of the 8 bus services listed on page 4 of the Traffic Report contained in the Development application.

The 1 bus service is ONE WAY - there is no return bus service.

Without the required access to public transport, the development no longer qualifies for consideration as a Seniors Living Residential Development

* 26 Location and access to facilities

(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to

(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and

(b) community services and recreation facilities, and

(c) the practice of a general medical practitioner.

(2) Access complies with this clause if-

(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable-

- (i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,
 - (ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,
 - (iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time, or
 - (b) in the case of a proposed development on land in a local government area within the Greater Sydney (Greater Capital City Statistical Area)-there is a public transport service available to the residents who will occupy the proposed development
 - (i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and
 - (ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and
 - (iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive)
- 2) The development application fails to meet the neighborhood characteristics requirement of the NSW State Environmental Planning Policy (Housing for Seniors) 2004* which requires that 'The proposed development should...recognise the desirable elements of the location's current developments.'

The demolition of 2 single family dwellings containing 4 bedrooms to build 9 homes containing 26 bedrooms is out of character with a residential neighborhood where only single family homes have been erected since the area was plotted over 100 years ago.

3) The Traffic and Parking Assessment Report (the Report) by Terraffic Pty Ltd (dated 12 Dec 2020) fails in its intended purpose to assess 'the traffic and parking implications of the proposed development.'

A development containing 9 dwellings with 26 bedrooms will introduce many more vehicles in the parking lane and 20 additional motor vehicles entering and leaving a driveway into and out of the heavily trafficked Ponsonby Parade.

The report is incorrect, incomplete and misleading:

Incorrect

All but 1 of the 8 bus services listed on page 4 of the Report have been withdrawn by NSW Transport. Without the required access to public transport, the development no longer qualifies as a Seniors Living Residential Development.

Incomplete

a) The Traffic Assessment Report contains no reference to the bicycle traffic on a street that is used by thousands of bicyclists. Ponsonby Parade is the route used by weekday bicycle commuters and weekend enthusiasts enroute to and from the Spit Bridge and the Northern Beaches. This one street on Ponsonby Parade may have more bicycle traffic than any other residential street on the northern beaches.

The Report cannot conclude that "there are no traffic implications," unless the safety of thousands of bicyclists is addressed and allayed.

b) Neither the site analysis nor the proposed design have addressed the current location of driveways which is required by the NSW Seniors Living policy 2004.

The current driveways of all homes on the western end of this street are on Ross Street. The proposed design moves the driveways to Ponsonby Parade, endangering thousands of bicyclists who use this street to and from the Spit Bridge and the Northern Beaches.

Additionally, NSW Seniors Living policy 2004 states: "basement car parking must minimize the impact of the entry by providing access from the secondary street." (p 9)

Misleading - The Report erroneously states that "there are no unacceptable parking and traffic implications."

The Report cites RMS Guidelines to estimate that there would be no more than 4 vehicle trips per hour created by the addition of 7 dwellings and 22 bedrooms.

The 'traffic generation rate' used in the Report is NOT applicable to a Seniors Living development with 3 bedroom dwellings. The report fails to acknowledge that most, if not all, bedrooms will be used by people of driving age: the over 55 owners, their adult friends, their staff or their children. (Over 95% of children with parents aged 55 or over have reached driving age).

For the past 100 years there have been no more than 4 vehicles owned by the residents of the 2 extant dwellings at 12 and 14 Ponsonby Parade. Council must consider the traffic safety implications of up to 26 vehicles owned by residents of the new development.

Additionally, Council must consider the parking and safety implications when visitors to the 7 additional dwellings park their vehicles on Ponsonby Parade.

SUGGESTED CONSIDERATIONS FOR COUNCIL

1) Deny the application because the FACILITIES and SERVICES required by the NSW policy are not located within 400 metres of the development

2) Deny the application because the PUBLIC TRANSPORT required by the NSW policy is not located within 400 metres of the development

3) Deny the application because the development of 9 dwellings containing 26 bedrooms is out of character in this neighborhood which has been entirely single family dwellings for over 100 years.

If Council is unwilling to deny consent for this oversized and inappropriate development:

a) Reduce the total number of dwellings to 6 and reduce the number of bedrooms in each dwelling to 2. The capacity of the 12 Ponsonby Pde site should mirror the capacity approved for the 14 Ponsonby Pde site. Do not allow the applicant to triple the number of dwellings and bedrooms that Council previously approved for redevelopment of 14 Ponsonby Pde.

b) Require the development applicant to provide an accurate assessment of the number of vehicles expected from residents and visitors. The estimate in the Terraffic report is wrong. Require the developer to amend the proposal to accommodate a correct estimate for increased parking and traffic.

c) For the safety of thousands of bicyclists, require that the development plans relocate the driveways to Ross Street, so vehicles do not enter and exit onto Ponsonby Parade. All of the extant driveways on the western end of this street are located on Ross Street to reduce traffic and increase safety on Ponsonby Parade.