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Subject: Online Submission

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RE: DA2020/1597 - 67 Pacific Parade DEE WHY NSW 2099

I am writing on behalf of my parents, owners of Unit 11, 64 Pacific Parade and wish to lodge our objection to the proposed development at 67 Pacific Parade. As outlined below the development is not compliant with numerous planning requirements and would cause loss of amenity to numerous neighbouring residents.

1) Compliance with Affordable Housing SEPP and Affordable Housing Guidelines

The development relies on numerous parts of the Affordable Housing SEPP to be exempt from normal planning requirements (i.e the number of parking spaces), however several of the proposed boarding rooms are too large for the development to be considered a boarding house.

Clause 30(1) of the Affordable Housing SEPP states;

A consent authority must not consent to development to which this Division applies unless it is satisfied of each of the following-

(b) no boarding room will have a gross floor area (excluding any area used for the purposes of private kitchen or bathroom facilities) of more than 25 square metres,

Rooms L301, 302 & 303 can be characterised as loft style one bedroom apartments and have a gross floor area of 35.7m² over 2 levels (including kitchen and bathroom facilities) as indicated on the plans. Deducting the approximate scaled area allocated for kitchen and bathroom facilities, the three loft apartments each have a gross floor area of at least 29m². Therefore, the development as currently proposed is not in compliance with the Affordable Housing SEPP requirements for boarding houses and should be rejected by council.

Furthermore, the proposed rent of \$500-525 per week should not be considered 'affordable' under the NSW Affordable Housing Ministerial Guidelines 2019-20. Under these guidelines housing is considered affordable if it is "appropriate for the needs of a range of very low to moderate income households", generally not exceeding 30% of gross household income.

I believe that the economic analysis used to support the determination that the proposed rent is affordable is flawed. The 2015-16 Household Expenditure Survey (HES) was used to reduce the proposed rent of \$500-525 per week by 25%, to "as little as \$375-\$394 a week", taking into account the fact that utilities, cleaning, internet etc is included in the rent charge. Based on the data of the HES, an average lone person household under 35 spends \$185 per week on rent payments. Furniture, insurance, utilities, internet, cleaning and recreation (only relevant recreation expenditure that would be potentially supplied by the proposed development, i.e TV's) amount to an average expenditure of approximately \$60 per week, or 25% of the total

housing cost based on rent of \$185 per week. However, furniture, utilities, internet ect. can be considered to be fixed costs (i.e they do not change with location, a person in Dee Why pays the same for internet as a person in Dubbo, even though rent is more expensive in Dee Why). Therefore, it would be more appropriate to deduct a fixed \$60 per week to account for these included amenities, bringing the rent only component to between \$440-465 per week.

For a single person on a moderate income as defined by the NSW Affordable Housing Ministerial Guidelines, rent must be less than \$382.50 per week to be considered affordable. Therefore, the proposed development cannot be considered 'affordable' for any very-low to moderate income single person. The proposed development is only 'affordable' for a couple of moderate income and due to the small design of the boarding rooms it is unlikely that many, if any couples will be sharing the accommodation. As such the development at the proposed rent levels does not meet the requirement that it is appropriate for a range of lower income households.

2) Noise

The acoustic engineer determined that the proposed development was predicted to generate noise levels above the acceptable noise limit at 4 locations (within the properties of 63 & 65 Pacific Parade & 1-5 The Crescent), primarily due to the common area and open terrace at the rear of Level 1.

The various control options proposed, including limiting the number of residents within various communal areas, are likely to be difficult to enforce and will represent an ongoing compliance and monitoring issue for nearby residents and council alike. As such I believe that it is not appropriate to approve a development with such noise generating outdoor communal areas within a small residential block, especially when there are outdoor areas situated at the rear of the block affecting 3 neighbouring properties.

3) Setbacks

The proposed development does not comply with the side and basement setback requirements and side boundary building envelope requirements. This non-compliance creates numerous issues for neighbouring residents including privacy, sunlight, and shading concerns. Additionally, as the basement excavation extends almost to the boundary line in some areas, there are potential structural and geotechnical concerns for neighbouring properties.

In light of the non-compliances discussed above we strongly object to the development as it is currently proposed.

Yours sincerely,

Helen Arnold