
Sent: 23/06/2020 1:43:51 PM
Subject: Online Submission

23/06/2020

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RE: DA2020/0512 - 532 Pittwater Road NORTH MANLY NSW 2100

Objection to Development application No DA2020/0512, Lot 40 DP7027, 534 Pittwater Road, North Manly.

Dear Tony Collier (Principal Planner at Northern Beaches Council)

I have received a notification letter from Northern Beaches Council regarding the Proposed Development (DA2020/0512) at 532 Pittwater Road, North Manly.

I live two doors away from the proposed development at 536 Pittwater Road, North Manly. The proposed development is just two doors away from my dwelling.

I wish to make a formal objection to the proposed development. The objection is based on the follow considerations.

Not a compliant development

Rear Setback - The rear setback does not comply.

Acoustic privacy - from verandahs overlooking the immediate neighbors at 534 and 530 Pittwater Rd.

Street scape - The proposed development breaches the minimum boundary setback from Council and the look of the building is not in keeping with the surrounding properties and streetscape.

There is insufficient outdoor space for occupants provided in these plans

Loss of Significant greenspace

The proposal consists of rooms that are self-contained with kitchenette and en-suite, more akin to studios or "micro-apartments" complexes. This allows for a significant increase in housing in a single resident residential block. The risk to the local community is a "domino effect" where, if this is approved, other boarding houses will proliferate in the immediate area and the low density residential amenity will be lost. The residential precinct around the proposal is dominated by a significant greenspace of large native trees including 100 years old *Angophora costata*s. Consequently due to the old growth habitat trees and patches of bushland combined with large gardens there is a lot of native wildlife including ringtail possums, water dragons and

a family of bandicoots. The risk is if this proposal gains consent in this particular residential precinct other similar developments will eventually fragment the significant greenspace that now exists. It should be noted that bandicoots and other native animals forage within the grass area of the proposed site. There was no assessment of fauna impacts in the SEE.

Parking and Traffic

There would be up to 24 residents in the proposed development. There is definitely not enough onsite parking planned in this development proposal to accommodate work and personal vehicles of the residents. Combined with the existing needs of the adjacent child care facility, a dramatic increase in parking demand in the surrounding streets will certainly occur.

The outcome will be that additional significant parking requirements will spill into the surrounding residential streets of Hope Ave and Corrie Road that are at saturation point already. There was no qualitative or quantitative assessment of catchment parking impacts in the SEE. Inappropriate proposed development in terms of Bulk and Scale Boarding houses should be similar in bulk and scale to the surrounding local area.

The proposal is also not consistent with the objectives of s30A of the development in terms of bulk and scale.

AHSEPP in terms of being a compatible

The proponent's SEE cites the nearest similar approved development at 428 Pittwater as justification for its proposal to be approved. The SEE states that "the boarding house development at 428 Pittwater Road has some similarities in design with our proposal"

The proposed development at 532 Pittwater Road is not at all similar to 428 Pittwater Road in terms of bulk and scale and especially the surrounding residential housing density. The 428 Pittwater Road development was reasonable to approve, due to the surrounding buildings being of similar bulk and scale.

The proposed development at 532 Pittwater Road is surrounded by modest structures and would be manifestly unreasonable to approve.

It is reasonable to assume that the 428 Pittwater Rd proposal was in keeping with Council's LEP objectives and the s30A of the Affordable Housing SEPP (AHSEPP) - Character of local area where the consent authority must not consent to development to which this Division applies unless it has taken into consideration whether the design of the development is compatible with the character of the local area.

The proposal will occupy virtually the entire site at 532 Pittwater Road and tower above adjoining developments in terms of bulk and scale. It would adversely impact upon neighbors on all sides, with significant losses of privacy and sunlight.

I consider this type of development proposal should not be in residential streets that cannot cope with the amenity impacts these types of developments bring. This belief was emphasized a recent statement by a spokesperson for the Department of Planning and Environment (DPE) that stated "Affordable Housing SEPP required councils to ensure new buildings were compatible with the existing or desired future character of a local area. This extends to matters including building bulk and scale, overlooking of neighbours and privacy, solar access, neighbourhood character, streetscape amenity, landscape design, and parking and traffic

impacts".

Poor and inadequate Environmental assessment (SEE)

I would also wish that Council consider the inadequate environmental and social assessment of the prepared SEE. There was little or no qualitative or quantitative assessments of environmental factors such as geotechnical impacts; operational noise; parking spillage; visual access and privacy; lack of accurate photomontages to illustrate bulk and scale; fauna and an accurate characterisation of the surrounding community. The SEE quotes sections of EP&A Act that are rescinded and no longer valid (ie s79C of the EP&A Act).

I do not believe that the SEE has addressed adequately the requirements of the EP&A Act.

Provisions not addressed appropriately under s4.15 include:

(a) any environmental planning instrument - The SEE does not address the provisions of the NBC LEP zone objectives with regard to bulk and scale being consistent with the surrounding dwellings. The SEE and proposal does not address bulk and scale and the surrounding dwellings with regard to s30A of the AHSEPP. Under 30A - Character of local area a consent authority must not consent to development to which this Division applies unless it has taken into consideration whether the design of the development is compatible with the character of the local area

(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality - the SEE is very weak and inadequate in terms of assessment of the environmental aspects of the proposal including noise, amenity, traffic, parking, bulk and scale, visual access and privacy.

(c) the suitability of the site for the development - a 2 story, 12-unit studio development where a single house once stood in a single house dwelling localized catchment is not a suitable site for the development.

(e) the public interest - it is not in the best interest of the local community to have developments that is essentially for 2 story, 12-unit studio development where a single house once stood in a local area of single story houses.

A recent UNSW survey found occupants of boarding houses approved since 2009 were closer in profile to typical renters than to traditional boarding houses lodgers. So the development would basically facilitate a low building cost / high rental return, apartment building without the zoning and building controls applicable to a new apartment block.

The survey concluded boarding houses were "not a particularly affordable housing option" and were being developed as "micro-apartments" rather than dwellings for marginal households. (see <https://www.abc.net.au/news/2019-06-26/the-new-general-boarding-house-lodger/11245584>)

This is not to say that another type of social housing development could not occur at the location. I would certainly support a development such as a group home for the intellectually or physically handicapped that is sympathetic with the localized catchment in terms of the building bulk and scale.

In Conclusion

I most strongly object to the proposal that is essentially for 2 story, 12-unit studio development where a single house once stood in a single house dwelling localized catchment.

The proposal will have significant impacts with regard to building bulk and scale; our neighborhoods character will be compromised and diminished; and parking and traffic impacts; operational noise.

I urge Council to reject this proposal as I believe it is inconsistent with Council's LEP objectives and future masterplan for the localised area. I also am of the opinion that the proposal is inconsistent with s30A of the AHSEPP.

It is not to say that another type of social housing development should not occur at the location. I for one would support a development such as a group home for the intellectually or physically handicapped that would be sympathetic to the localized catchment in terms of the building bulk and scale, overlooking of neighbors and privacy, solar access, neighborhood character, streetscape amenity, landscape design, and parking and traffic impacts.

If this application is to be decided by councilors, please take this as notice that I would wish to speak at the meeting of the committee at which this application is expected to be decided or any other local or regional planning panel determinations.

Your faithfully

Dr Michael Popplewell