
Sent: 25/03/2020 3:12:38 PM
Subject: Submission regarding Development Application No. 2020/0205 at 18 Alexander Street, Collaroy
Attachments: DA Submission 18 Alexander Street, Collaroy.pdf;

Dear Sir or Madam,
Please find attached a submission prepared on behalf of my client, David Rolls of 28 Alexander Street, Collaroy, in relation to Development Application No. 2020/0205 at 18 Alexander Street, Collaroy.
If you require an inspection of my client's property or any further information, please do not hesitate to contact me.
Kind Regards,
Fran Dargaville
Town Planner

m. 0404 626 165

25 March 2020

The General Manager
Northern Beaches Council
PO Box 82
MANLY NSW 1655

Attention: Renee Ezzy

Dear Ms Ezzy,

APPLICATION: DA2020/0261 & DA2020/0205
PROPERTY: 18 Alexander Street, Collaroy
Lot 8 & 9 DP 6984
PROPOSAL: Boarding house developments

On behalf of my client, David Rolls of 28 Alexander Street, Collaroy, I would like to offer the following submission to detail my client's concerns with regard to the proposed development at No. 18 Alexander Street, Collaroy, and in particular the impact of the proposed development on car parking and traffic along Alexander Street.

My client's property is located to the west of the subject site, on the southern side of Alexander Street.

I have been requested by my client to review the development application plans and associated reports provided and have also undertaken an inspection of the site and the area in which the subject property is located.

Ordinarily, we would not raise concerns in relation to the construction of reasonable development; however, we consider the proposed new boarding house developments in their current form to be presenting an excessive and unreasonable impact on the amenity of the locality.

Whilst we note that the proposal is generally in keeping with the provisions of Division 3 of the *State Environmental Planning Policy (Affordable Rental Housing) 2009* in relation to boarding houses, the provision of two adjacent boarding house developments in an already congested street will result in an adverse impact on car parking and traffic flows along Alexander Street. Under normal circumstances, commuters park along Alexander Street to take the B-Line Bus, and the street parking is also utilised by people attending Collaroy Beach and the nearby shops. Figures 1 and 2 (attached) demonstrate the narrow nature of Alexander Street, together with the limited availability of car parking.

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The development on Lot 8 will accommodate 24 lodgers and one manager, and the development on Lot 9 will accommodate 20 lodgers and one manager, resulting in up to 46 occupants in place of the existing single family dwelling.

Whilst it is noted that that a Traffic and Parking Impact Assessment was prepared by Transport and Traffic Planning Associates, and the proposed number of car spaces meets the absolute minimum requirement, the provision of two boarding houses immediately adjacent places substantial strain on the demand for street parking along Alexander Street.

The minimum car parking requirements outlines in Division 3 of the *State Environmental Planning Policy (Affordable Rental Housing) 2009* read as follows:

- (2) *A consent authority must not refuse consent to development to which this Division applies on any of the following grounds—*
- (e) parking*
if—
 - (iia) in the case of development not carried out by or on behalf of a social housing provider—at least 0.5 parking spaces are provided for each boarding room, and*
 - (iii) in the case of any development—not more than 1 parking space is provided for each person employed in connection with the development and who is resident on site,*

Car parking alone is not grounds for refusal of a development application, however when considered in conjunction with the other issues including bulk and scale and soft landscaped area, and the fact that two adjacent boarding house developments are proposed resulting in an intensification of the development, we believe that the car parking is inadequate to meet the demand generated by the proposed use.

We therefore request that the availability of on-site parking be increased to suitably meet the demand generated by the subject developments.

Furthermore, the proposed boarding house developments are contrary to a number of provisions of Warringah Development Control Plan, which are outlined as follows:

Part B1 – Wall Heights of Warringah Development Control Plan seeks to minimise the visual impact of development.

As noted within the the plans prepared by Walsh Architects, the development on Lot 8 and 9 will present a variation to the wall height control. Whilst the Statement of Environmental Effects prepared by BBF Town Planners and submitted with the application suggests that wall height does not constitute a reason for refusal under the provisions of Clause 29(2)(a) of the SEPP (ARH) 2009 as the proposal complies with the statutory height limit, the wall height control has a different intention and outcome to the building height control. Accordingly, the proposed variation to the wall height control, together with the numerous other variations and impacts, is considered grounds for refusal, or at least modification of the development to reduce its visual impact within the locality.

The control seeks to achieve the following objectives:

- *To minimise the visual impact of development when viewed from adjoining properties, streets, waterways and land zoned for public recreation purposes.*
- *To ensure development is generally beneath the existing tree canopy level.*
- *To provide a reasonable sharing of views to and from public and private properties.*
- *To minimise the impact of development on adjoining or nearby properties.*
- *To ensure that development responds to site topography and to discourage excavation of the natural landform.*
- *To provide sufficient scope for innovative roof pitch and variation in roof design.*

The bulk and scale of the proposed boarding house developments is excessive, and is not considered to be in keeping with the modest residential scale of existing surrounding development.

We therefore request that the application be modified to reduce the bulk and scale, and comply with Council's wall height control.

Part B3 – Side Boundary Envelope of Warringah Development Control Plan seeks to minimise the bulk and scale of development.

As noted within the the plans prepared Walsh Architects, the development on Lot 8 and 9 will present a substantial variation to the side boundary envelope control.

The control seeks to achieve the following objectives:

- *To ensure that development does not become visually dominant by virtue of its height and bulk.*
- *To ensure adequate light, solar access and privacy by providing spatial separation between buildings.*
- *To ensure that development responds to the topography of the site.*

The proposed boarding house developments appear excessive in bulk and scale, and are not in keeping with the existing modest residential character of development along Alexander Street. We therefore request that the development be revised to comply with Council's building envelope control.

Part D1 – Landscaped Open Space and Bushland Setting of Warringah Development Control Plan seeks to minimise the bulk and scale of development.

Each lot is required to provide a minimum soft landscaped area. As noted within the the plans prepared Walsh Architects, the developments on Lot 8 and 9 will present a substantial variation to the landscaped area control, providing a landscaped area of 21% and 23.1% respectively.

The control seeks to achieve the following objectives:

- *To enable planting to maintain and enhance the streetscape.*
- *To conserve and enhance indigenous vegetation, topographical features and habitat for wildlife.*
- *To provide for landscaped open space with dimensions that are sufficient to enable the establishment of low lying shrubs, medium high shrubs and canopy trees of a size and density to mitigate the height, bulk and scale of the building.*
- *To enhance privacy between buildings.*
- *To accommodate appropriate outdoor recreational opportunities that meet the needs of the occupants.*
- *To provide space for service functions, including clothes drying.*
- *To facilitate water management, including on-site detention and infiltration of stormwater.*

The proposed boarding house developments will not see the retention of adequate soft landscaped area, and will result in the dominance of the built form over soft landscaping.

Furthermore, the limited pervious areas within the sites may result in potential adverse impacts on stormwater flows within the locality.

We therefore request that the proposed developments be modified to comply with Council's soft landscaped area requirement.

In addition to the issues addressed above, my client has raised concerns regarding the following matters:

- My client has raised concern with regard to the potential for stormwater issues and flooding within Alexander Street occurring as a result of the natural watercourse to the rear of the site, together with the limited pervious area provided on each of the allotments. We therefore request that this be closely assessed by Council's engineers, and the soft landscaped area be increased.
- Concern has been raised as to whether suitable disabled access is available to the existing pool on Lot 9. The Access Assessment Report prepared by BCA Logic and submitted with the application states that no swimming pool is proposed, however it appears that the existing swimming pool is retained.
- Further concerns have been raised with regard to waste management. Due to the narrow nature of the road, garbage trucks prevent the passing of traffic along Alexander Street. The additional burden on car parking together with the additional time required to empty the bins within the proposed boarding house developments is likely to result in substantial traffic delays along Alexander Street.

We welcome Council's specific consideration of these issues, and remain available to discuss any aspect of our submission and welcome the opportunity to discuss our concerns with Council. I would appreciate your early advice as to how the application is to proceed and we would appreciate the opportunity to further discuss the matter with staff prior to any final determination.

Should you require any further information with regard to the above, or require a site inspection of my client's property, please do not hesitate to contact me on 0404 626 165.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'Dargaville', with a stylized flourish at the end.

FRAN DARGAVILLE

Town Planner

BPlan (Hons) UNSW



Figure 1: Streetscape view along Alexander Street, looking east



Figure 2: Streetscape view along Alexander Street, looking west