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RE: DA2018/0149 - 60 Binalong Avenue ALLAMBIE HEIGHTS NSW 2100

NB. Please refer to the Media release attached at the bottom by Northern Beaches Mayor in response to recent SEPP changes announcement by Minister of Planning

The NSW Government is reviewing the SEPP and in the last week has proposed reforms to cap the number of micro apartments allowed in a boarding house development in low-density residential zones to a maximum of 12 per site. Minister for Planning, Anthony Roberts, said the changes had been drafted in response to concerns from communities about local impacts of boarding house developments. Whilst community groups across Sydney and the Northern Beaches, including the Allambie Heights Action Group, think this is a step in the right direction, we, along with the councils that we voted for, are also insisting that SEPP developments are located in correct zoning for their size eg. medium to high density not be allowed low residential zoned areas.

My background - why we chose Allambie

I have a Grad Dip in Professional Clinical Supervision, a Master of Psychotherapy and a Bachelor of Social Work. I have 20 years' experience working with women who have severe mental health concerns, who have suffered with complex trauma, who are disadvantaged and many of whom have been in need of affordable housing. Over half of them have had families so this new wave of 'New York City style, micro apartments', aka boarding houses, would not be suitable for them. Communities need many types of affordable housing, in the right areas and with the right infrastructure to support.

I grew up in a small 2 bedroom unit in Manly Vale which is 5 minutes down the road from Allambie. It was noisy, there was no green space and there was a lack of privacy. I then lived in medium to high density areas of central London for 15 years. I have had 30 years' experience living in small, overcrowded and extremely noisy spaces.

My mother still lives in Manly Vale where it regularly takes us 20 minutes to find a car park because studio, one and two bed apartments only require 1 space per apartment and this is nowhere near enough. Boarding houses only require 0.5 per apartment, even though most of the proposed boarding house developments can house 2 people. It also takes me 4-5 sets of lights to exit either side of her street due to traffic congestion.

My husband and I specifically chose Allambie to raise our adopted children because of the quiet, leafy, low density streets and the family friendly, community charm and

local village character. It would be a tragedy if Allambie suffered the same fate as Manly Vale and other suburbs which have snowballed into medium to high density living. Allambie Road is already severely congested and worse since the opening of the Northern Beaches Hospital.

Developer led planning of New York City style, medium to high density, micro apartment blocks under the disguise of SEPP 'affordable housing' are out of character in Allambie

In recent months there have been over 40+ SEPP boarding house & SEPP seniors proposals in Allambie, Frenchs Forest and surrounding suburbs on the Northern Beaches. 60 Binalong is just one of those. This boarding house application should therefore not be viewed independently. Novak Real-estate is currently plugging boarding house developments to developers in a brazen way.

As recently as the 29th November, 2018, the Planning Minister, Anthony Roberts, in the Sydney Morning Herald urged the following,

'Developers and builders would be better served consulting their communities to attain support for their projects'.

Without inclusion and consultation with the local community and under the State Environmental Planning Policy cashed up developers are abusing SEPP loopholes and are seeking to build medium to high density 'New York style micro apartments' under the disguise of boarding houses, on blocks of land where typically one house usually sits.

Because this area of Allambie is zoned R2 Low Residential and Binalong is a quiet, leafy, single dwelling street, adding a medium to high density micro apartment block on a space where one person recently lived, is completely out of character with the surrounding environment. This micro apartment block is more suited to Manhattan, where the term 'micro apartment' stems from! Given the green light, this will absolutely set a precedent for this area, opening the floodgates for greedy developers to snap up any knockdown rebuild (of which there are many in Allambie) within 400 metres of a bus stop. 2 years ago, when we searched for a new home, we were outbid 3 times by developers. Our personal experience is that developers are raising housing prices in this area. A point to note is that because Allambie is a 'drive through' suburb, this means that both sides of Allambie Road (and a 400m radius) are prey to unplanned for, developer led planning of medium to high density, boarding house, apartment blocks disguised as 'affordable housing'.

Approving this out of character, micro apartment building and opening the floodgates to future unplanned for over developments will also bring with it a myriad of physical and mental health concerns; less space, less green space, more artificial light, more noise, more cars and more traffic to the already congested Allambie Road - which we now share with emergency vehicles accessing the Northern Beaches Hospital.

***The impact on the health of existing and future residents if the unplanned for development of medium to high density apartments are approved ***

Leading environmental consultant and President of Save Our Suburbs, Dr Tony Recsei reports that higher density living is detrimental to our health and that serious consideration needs to be given to future planning options in the city and surrounding suburbs due to increased health risks that have been linked to higher

density living. To quote,

"People are happier in low density housing and there have been studies done that show people in low density housing are better off, so surely human happiness should be considered when planning future developments....There has been anecdotal evidence that proves people are less happy in higher density housing....There has been research done in Sweden involving four million people and it found that there is an increased risk of schizophrenia and depression when people are forced to live so close to one another. It found that the higher the density, the worse the neural stress was on people. For Sydney, this is a very worrying find because mental illness is a serious problem and if they are going to increase higher density housing then the issues are only going to get worse. Planning processes need to be reconsidered." So whilst we may be having a 'housing crisis' now - what kind of 'health crisis' are we creating by destroying quiet and peaceful suburbs by allowing out of character, medium to high density buildings into R2 zoned low residential streets?

My concerns - as an expert in mental health - are for both the people moving into such small spaces, as well as those of us who are already living in Allambie.

Lower density living is a protective factor. Some of the mental health concerns reported for higher density living are as follows:

- A deep sense of loss for the existing environment and community as the suburb transforms in an unplanned manner from low density residential to over developed medium to high density
- Higher traffic congestion which is linked with more traffic accidents, increases pedestrian fatalities in children, aggression, violence and domestic violence.
- Parking disputes which lead to anxiety, depression, verbal and physical violence
- Noise pollution from: cars, increased no. of units, communal space gatherings, smoke alarms going off which can all result in sleep deprivation, stress and anxiety which can lead to obesity which can lead to many chronic diseases
- Disturbances in circadian rhythms due to excess artificial light in medium to high density apartment blocks, resulting in a disturbance with body temperature, heart rate, blood pressure, and the release of hormones such as melatonin which helps us with sleep
- Neighbour conflict from common space usage which is linked with chronic stress and violence
- Overcrowding - the potential health risks and crowding challenges can outweigh the benefits of affordable housing (even though these boarding houses won't be affordable for those who really need them!), crowding related stress has been linked to increased rates of domestic violence, substance abuse and withdrawal from society
- Concerns regarding one's sense of identity related to the space they live, a sardine tin room does not allow for self-expression and relaxation - they are mostly perfunctory
- Pollution caused by high density living and increase in vehicles, dust and grit in the environment, leading to respiratory disease
- Poor indoor air quality in micro apartments impacts physical and mental health
- The higher the density, the higher the social impact such as fear of crime, social capital, privacy levels, social interaction, networks and sense of belonging
- Governance and maintenance of the residents if poorly managed can result in a dysfunctional living environment which results in lack of control and safety
- In higher density living, incivilities such as vandalism, crime and disorder tend to

escalate

- Higher density housing with higher population densities, particularly located near shops and services, is likely to increase the incidence of local crime and disorder simply because there are more people circulating in the area.
- Residents living in higher urbanised environments are more impacted by heat, heart disease, mental illness and Type 2 diabetes
- Higher density living results in an increase in stimuli and a stripping away of protective factors. As these protective factors erode, people become more vulnerable to developing mental health problems.

LOW DENSITY LIVING breeds better health outcomes much further down the track in terms of not only coping with certain illnesses but also the prevention of illness.

Unaffordability

The SEPP was introduced to allow low cost accommodation for socially disadvantaged people and low income earners. There are many organisations and charities advocating that boarding houses are NOT suitable accommodation, especially for those with mental health issues.

The Allambie and Northern Beaches community support the need for affordable housing for a range of demographics. Unfortunately, the SEPP Policy is being exploited by developers in that this new wave of boarding houses will not be affordable for low income earners and people who truly need affordable housing. In the Eastern Suburbs where boarding house developments have turned residential streets into concrete jungles and ghettos, many rooms are rented out on AirBnB to travellers for \$500+ a week. One boarding house complex regularly rents on AirBnB for \$100+ a night! At this rate, the developer would take \$832k in rent!

Michael Regan, Mayor of the Northern Beaches says,

"The major issue is they become medium-density developments in low-residential areas, there is no good strategic planning and they are not renting at affordable prices".

Cr D'Souza (Randwick) said,

"Developers were treating the policy as a "cash cow", and new rental controls were needed to ensure the rooms remained subsidized for low-income earners and key workers. What we are seeing is developers taking advantage of generous incentives to get bigger developments built in residential areas under the guise of helping the community, yet they are charging market rates which are way out of reach of those most in need."

Tenants Union of NSW says,

"Those campaigning for low-cost housing options argue that the boarding houses don't make much of a contribution. With rents often around \$500 a week for much smaller spaces with fewer facilities than a regular residential tenancy, they're still unaffordable for many.... we would question the aim of reducing unaffordability." Shelter NSW says, "These aren't actively delivering affordability... That isn't an outcome we are seeing, which is disappointing"

In the Eastern suburbs where they have been fighting these issues for a while now, Randwick Council has requested the Department of Planning conduct, "a comprehensive review of the effectiveness of the SEPP policy", including an audit of

the location and number of boarding houses approved under the policy, and the rents charged.

I do not believe that the developer of 60 Binalong Avenue has housing affordability or the mental health and well-being as the motivation for his 'fake' boarding house. In addition to my original objection points, I therefore ask that you reject this development on the grounds that it is not meeting the objective of the SEPP policy and that it is out of character for this quiet residential suburb.

I am also asking for this boarding house to be rejected because in March 2018, the Northern Beaches Council and Mayor overwhelmingly voted to have more control in relation to where affordable housing is placed on the Northern Beaches. They see the need, as do the local community, for more affordable housing, however, affordable housing needs to be determined by professional planners, not by developers who have little regard for the existing character and community. Affordable housing needs to be planned for properly and in accordance with supporting infrastructure, which as a side note, Allambie is severely lacking. The Northern Beaches Council ideal is for affordable housing to be built on transport hubs such as the B-Line and in medium to high density zoned areas.

Allambie is an Aboriginal word meaning, "peaceful place". I therefore ask that you reject this development and keep Allambie a safe, quiet and peaceful place for people to live and raise their families.

*** Wednesday, 28 November 2018 NBC Mayor's Response to Proposed SEPP changes***

The state government announcement today to cap the number of units in boarding house developments is good news for local residents and will break the incentive for profit driven developers to exploit affordable housing rules.

Mayor Michael Regan cautiously welcomed the announcement having made numerous representations to the Minister and the State planning department to address the issue.

He urged the Minister to seriously consider implementing the controls on all current and future development under the SEPP to enable bad outcomes currently in the system to be avoided.

"We have always clearly stated we are not against boarding houses - we are against bad planning," Mr Regan said.

"And the state government rules on boarding houses override Council's planning restrictions. They allow giant development in suburban areas where Council would never approve them.

"If the cap was introduced it will encourage investment in affordable housing for those who really need it, not just line developer pockets. It will be more likely to attract affordable housing providers who have a passion for their clients, not just profit driven enterprises.

"We will need to see the full detail before we can give it our full endorsement but on face value, it sounds like a good measure. It's critical the changes are applied to current, not just future proposals so we can knock out of the system those proposals we are currently fighting that will ruin local streets.

"We all want to increase our stock of affordable houses - on the Northern Beaches it's an urgent priority - but it simply can't be at the expense of sensible planning.

"Our preference is for the state government to step back and allow Council to plan our own solutions for affordable housing. We have the knowledge on the ground to undertake considered planning decisions and better facilitate affordable housing in our area - just like we are currently doing with the new housing precinct at Frenchs Forest."

Mr Regan said Council had been inundated with proposed boarding house development looking for assessment under the state government rules for boarding houses.

"In 2016/17 we had two development applications for boarding houses. In 2017/18 we had thirteen. Some literally want to put in 100 room developments where a single block currently stands in suburban areas, away from good transport or infrastructure.

"It is hardly surprising that so many in our community are up in arms about it.

"I am pleased the Minister is taking our, and others, calls seriously on this issue.

"Council will be providing a detailed submission to the Minister to ensure we get the right outcomes for our residents."