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

SUBMISSION AGAINST AHSEPP DA 2018/0149 - PROPOSED BOARDING HOUSE AT 60 BINALONG AVE ALLAMBIE HEIGHTS.

I wish to lodge an objection to this AHSEPP development on the following grounds:

- The intent of AHSEPP is understood but in reality it has been a dismal failure in many areas of Sydney and created a loop-hole for developers to build medium density housing in low density areas without the accompanying services and infrastructure requirements of medium density areas. The loop hole also allows developers to charge high rent (commensurate with land prices in the respective area and SEPP legislative guidelines) under the disguise of affordable housing. Many Councils are petitioning the NSW Government to change this ridiculous legislation and policies and Northern Beaches Council should do the same.
- AHSEPP is ridiculous as it is creating Medium density housing by stealth in low residential areas. For example, Novak Real Estate are advertising for developers to take advantage of loop holes in SEPP legislation and build boarding houses in low density residential areas without the development costs associated with low density zoned areas. This poor legislation/policy also creates the situation where it is easier and cheaper to build a boarding house than do an extension on a family home. More appropriate locations for this type of development include commercial and high/medium density residential areas.
- AHSEPP developments create cheap and inappropriate over development in low density residential areas. If a precedent is set, conceivably whole suburbs in NBC could be turned into havens for boarding houses.
- The NSW Department of Housing has publicly stated recently that AHSEPP has failed to address the problems of housing affordability and homeless rough sleeping arrangements.
- The building itself is out of character with the surrounding low density residential area. It may look like a house but in reality it is a multi storey and multiple room structure plus common areas built on a small suburban block in a low density housing zone. This structure is designed for large and medium density housing for large numbers of tenants.
- It is the obligation of the NBC to ensure that the proposed development is compliant to all aspects of the AHSEPP. Clause 30A of the planning policy states "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." There is no clear definition of "local

area" but a government discussion paper from 2010 indicates review of streets and blocks surrounding the location is appropriate when determining the character of the local area.

- This development does not comply with Clause 30A in relation to the character test of the area. Clearly the bulk and scale of the proposed development is not compatible with the character of the local area which is predominantly single dwellings. The proposed development is a large multi storey structure with a large visual bulk. There has been no attempt to break up this visual bulk through the architectural design.
- AHSEPP is also faulty in that it provides for boarding houses in low density residential areas without any follow up requirements for ongoing management and commensurate provision of additional services. LGNSW suggests that the boarding houses will be responsible for enforcement and councils have the power to police breaches, but there is no commensurate detail on how this will be done or on the provision of commensurate resources or support. LGNSW Evaluation reports also state that enforcement of controls and management of boarding houses needs to be more strictly policed.
- The large number of additional persons living in this structure will put excessive pressure on existing services and infrastructure including water, gas, electricity, sewage and garbage/waste services.
- AHSEPP only requires a small number of parking spaces for this type of development where in reality each client may have a vehicle and a large number of vehicles will be present at the site (based on the client demographics for the high rent to be charged). This clearly will create parking and traffic congestion and create a dangerous situation for local residents.
- The minimum number of car spaces has been proposed. Whilst technically compliant with the AHSEPP requirements, the reality is that these provisions are substantially inadequate and boarding house resident parking will overflow into surrounding streets. This will certainly affect parking and traffic congestion around the development greatly reducing the amenity of the adjacent residents.
- NBC and local residents are (or should) be well aware of the increasing volumes of traffic on the Northern Beaches in recent years. Many roads are now grid locked during AM & PM peaks and at numerous other times during the day. AHSEPP housing developments are exacerbating the traffic problems on the Northern Beaches. This problem will be made worse by the high density housing planned for the area.
- As the Federal Member for Warringah (the Hon. Tony Abbott MP) has stated, "the Northern Beaches is choking in traffic" and a moratorium on development on the Northern Beaches should be implemented immediately.
- The Waste Management Plan for the development is considered to be substantially underestimated and the drain on waste removal resources is excessive. During the periods of waste collection, there will certainly be significant additional traffic congestion.
- The bus services that operate in the area do not support the number of additional tenants this AHSEPP proposal will generate. Reliance of these services after hours is unrealistic. Allambie Heights is not a transport hub and infrequent connections are required to reach a transport hub.
- Under AHSEPP guidelines persons with disabilities includes those with alcohol and drug induced psychosis. Persons recently released from gaol and psychiatric confinement also fall into this category. In my professional capacity I have seen the

adverse effects on both the tenants and local community of persons with these disabilities living in close proximity in a communal living environment.

- NSW Police Crime Pattern Analysis also identifies the link between this type of housing and increased crime rates and community problems.
- In relation to the SEPP legislation allowing high rent under the disguise of affordable housing, is the NSW Government providing any rental subsidy payments to those with disabilities to live in this type of housing?

As state legislation is encouraging this type of affordable housing development I have also made a similar submission to the NSW Member of Parliament for Wakehurst (the Hon. Brad Hazzard MP).