
Sent: 20/02/2018 11:43:55 AM
Subject: DA Objection
Attachments: Nargong Rd Boarding House.docx;

Please see attached re our formal objection to DA 2018/0149.

If we thought the proposal for a Boarding House at 139 Allambie Road (2017/1191) was bad, this latest proposal is an absolute disgrace. The size and scale of this development is totally out of character for what is now a quiet suburban street. I appreciate that Council's control over SEPP legislation restricts its ability to reject such applications but I urge Council to use whatever powers it may have, including investigating the use of technicalities within the legislation, to overturn these developments. After all, if developers can use loop holes to over-ride what is supposed to be affordable housing, surely it is within Council's ability to do likewise and expose SEPP for the sham which it has become. Play these vultures at their own game.

We all know that they are hiding behind the provision of affordable housing but clearly that is a sham. How many more of these developments are likely to be proposed across the Northern Beaches before we wake up to what is occurring? Make no mistake.

The residents of Allambie Heights are extremely angry over these developments and will not lie down and be swept away by either the State Government and rapacious developers who think that they can support developments that would normally never receive Council approval.

We chose to live in this area because of its quiet, low rise, family-friendly atmosphere and object with outrage the prospect of over-development. The fact that any government thinks it can over-ride basic democratic rights of its constituents is absolutely appalling and will come back to bite it when it discovers just what an angry and deceived community can achieve to oppose such developments.

How any developer who thinks it appropriate that the site which contained a single dwelling that once was home to a widow for the past twenty odd years can now be turned into a boarding house of 36 rooms and a potential population of 50+ tenants escapes me. As a line made famous in the iconic film *The Castle* proclaims: **Tell Im they're dreaming!** When ordinary people get angry and mobilise, our elected representatives should be concerned. It is time for them to stand up for us.

Council: please get behind the Allambie Action Group and help us to consign this proposal to the political dustbin where it more appropriately belongs.

yours sincerely

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OBJECTION TO PROPOSED DEVELOPMENT OF A BOARDING HOUSE

16 BINALONG AVENUE, ALLAMBIE HEIGHTS 2100 (sic)

DA 2018/0149

We wish to lodge strong objection to the proposed development as listed above.

Following a Development Application for a Boarding House at 139 Allambie Road, Allambie Heights (DA2017/1191), a public meeting that attracted a large number of concerned local residents on Saturday 3 February 2018 objected strongly to the concept of such developments occurring in Allambie Heights. Concern was expressed that under the State Government's SEPP legislation, further such developments might occur, leading to a dramatic change to the character and make-up of our community which since its beginnings, has been a family-friendly, low density residential area.

We didn't have to wait long for such concerns to materialise with this latest DA for a similar structure under the guise of SEPP legislation but twice the size of the 139 Allambie Road proposal. We are well aware of Council's limited ability to reject such proposals as they fall under the banner of 'Affordable Housing' but that concept is open to so many loop-holes to any developer wishing to skirt around the normal DA process. This latest proposal has all the hallmarks of such action.

Nevertheless, mindful of the growing community anger and concern that our suburb is fast becoming a developer's paradise by stealth utilising the dubious notion of affordable housing, we wish to make our own objections clear. On this occasion, the proposed development is occurring within 100 metres of our house which we have occupied for over forty (40) years. We submit the following points:

- The DA itself lists the address of the proposed Boarding House as 60 Binalong Avenue. We submit that this is technically incorrect as the existing dwelling on the land concerned has always been listed as 15 Nargong Road. The photos of the existing dwelling contained within the DA proposal clearly shows the entrance fronting Nargong Road and there are no existing entrances to the site from Binalong Avenue. The existing dwelling is clearly identified with #15 on the front entrance. Under what pretence and for what purpose is the development now listed as Binalong Avenue?
- The size of the proposed development is totally out of character with the surrounding neighbourhood. Despite submitting photos of existing two-storey dwellings in the surrounding area as evidence of how the proposed development will 'blend in' with its neighbours, this ignores the obvious scale and size of the proposed structure which is more akin to a medium-sized residential apartment block or multiple town house development, neither of which exist anywhere near the proposed site and which would not be allowed under existing zoning regulations. The scale of the development is totally unsuitable for the size of the land and under normal circumstances, Council would not allow a development approaching even half this size to be considered, let alone be approved.

- The proposed boarding house contains 36 bedrooms but does not state whether these are for single, double or triple occupancy per room. Indeed, are there any such restrictions applying under SEPP? That in itself has enormous implications for the overall footprint of this dwelling on the immediate neighbourhood. The existing house on the site has been home for just one person for at least the last twenty years so the concept of the proposed dwelling being compatible with the neighbourhood fails the most basic of tests. We submit that compatibility within a neighbourhood is not just about the building but more critically, about the social impact on the neighbourhood. Any building which has the potential to more than double or triple the number of residents residing in a local community has to bring with it major social and cultural impediments.
- Under SEPP guidelines, the provision of off-street car parking spaces is totally inadequate. In this case, the proposal boasts that it is exceeding the formula by providing an extra car space on site yet still provides only nine car spaces for the occupants. As stated above, the minimum number of occupants is 36 but potentially could be double that number. If even only half these occupants have cars, the overflow of vehicles to be parked on surrounding streets will be significant. Already, both Nargong Road and surrounding streets have large numbers of cars parked at various times of the day so that the potential for more traffic gridlock is a serious risk. How anyone could believe that a development of this size would not severely adversely affect local traffic arrangements escapes us.
- The guidelines under SEPP make great play of the fact that such structures must be close to regular transport. Other submissions of objections already lodged go into some detail as to why this particular requirement cannot be met so we do not need to elaborate. Suffice to say, Allambie Heights is not well served by regular public transport, particularly outside peak periods and travelling to areas other than Warringah Mall is often difficult to co-ordinate. After dark on any day, you can forget about trying to catch any bus to or from the area so that if the proposed boarding house is to accommodate shift workers, we wish them well. All the more reason why most potential residents will have to own their own car.
- We are not experts when it comes to assessing the adequacy of utility services to the proposed development but a dwelling of this size obviously has major implications for water, sewerage, drainage and power requirements. It is not clear from the DA documentation that such requirements have been satisfied. Surely Council will require an independent assessment of such arrangements, in consultation with the utilities concerned.
- Similarly, given the proximity of the proposed dwelling to the significant area of bushland of Manly Dam Reserve, we query whether the DA meets all fire prevention requirements. Again, we presume Council will confirm such with the Rural Fire Service of NSW and /or the NSW Fire Brigade.

- Much of the residential area of Allambie Heights has been designed to allow a natural access to the street. This means that apart from Allambie Road, few streets have formed footpaths. That is certainly the case of Nargong Road and surrounding streets. The extra volume of traffic likely to flow from this development will place additional safety risks to pedestrians, especially young children who walk or ride to the local schools.
- The existing two dwellings on the site are both over sixty (60) years old and are constructed of fibro (read asbestos). We could not find anything in the documentation lodged with this DA as to how demolition of the existing dwellings is to take account of the public safety issues associated with the removal of such material.
- We do not object to the concept of affordable housing *per se*. Rather, we are alarmed at both the size of this proposed development and the fact that it would appear that there are no controls over the number of such developments that could be built in a given area. For instance, what is to stop other such developments occurring within our street? Indeed, local real estate agents have been quick to seize upon the market potential and we have received several pamphlets and phone calls in the past month from a number of agents seeking our interest in selling up. Perhaps co-incidence in regard timing but we think otherwise. As we live on a large corner block, perhaps they see the potential for a development similar in size to that proposed in DA2018/0149. Over the past year, Allambie Heights has been recognised as one of the most sought-after suburbs in the Northern Beaches, hence the attraction to potential developers of scouring existing properties that could be potential boarding houses. We submit that the notion that such developments are motivated by the desire to increase the pool of so-called affordable housing is little more than a dubious scam as developers use the loop holes in SEPP legislation to push through medium to high density housing in residential areas that normally would have zero prospects of approval. We live here because of the absence of such developments yet now we are under threat from such dwellings as the vagaries of SEPP legislation appear to be exploited.
- In the case in point, the land on which the proposed dwelling will sit was sold at auction in December 2017 for \$2.46m. The DA itself lists the construction cost of the proposed dwelling at \$4.467m, making a total investment of \$6.927m, plus other associated development and design costs. Even the most generous of economic analysis would conclude that the return of investment of such a project is not going to be great under a housing affordability pricing regime so we question the real reason for the proposal.
- Other objectors to this development have highlighted the practice of Novak Properties and their blatant exploitation of SEPP guidelines to allow developers to over-ride affordable housing arrangements and use the boarding house concept as a means to maximise profits by charging market rates for rental to prospective tenants. Their material refers to such dwellings comprising 'luxury studios' that 'attract weekly rentals of \$350-500'. This is hardly within the definition of affordable housing yet the SEPP guidelines allow such practices to flourish without regulation. Novak further highlights the absurdity of the guidelines by

referring to rooms within boarding houses being let out 'at lightning speed' with 'people lining up down in the hallways at opens (sic) and more often than not they're exceeding the advertised price due to the high demand of tenants'. Their brochure also exposes the myth of sufficient car spaces in such developments by promoting to prospective developers the significant savings in construction costs to be made by not having to provide a car space for each tenant, as would normally be required in a building. The sad fact is that Council would be well aware of such facts but is apparently powerless to over-ride SEPP guidelines.

Given the potential for boarding house developments to become increasingly prominent within the Northern Beaches area, particularly if real estate agents are working in cahoots with potential developers as we suspect, we strongly endorse the push by other concerned residents for Council to impose an immediate moratorium on further developments until it can engage in dialogue with the State Government to re-assess the success or otherwise of such developments. We have made separate submissions to the local MP, Brad Hazzard, about our concerns but have been alarmed by his apparent lack of interest or concern. In particular, the question that must be satisfied is whether the stated aim that such dwellings are strictly limited to those residents who fall under the eligibility criteria for affordable housing. How are such requirements to be policed? This will not satisfy other major issues such as the size and scale of such developments and their impact on the local neighbourhood but at least would halt the loop holes that obviously flourish within the existing guidelines by unscrupulous developers.

While one cannot stand in the way of reasonable progress and conscious of the fact that we do not wish to be seen as NIMBYs, the simple fact is that regardless of whatever merits may flow from boarding houses designed to alleviate shortages in so-called affordable housing, the concerns of local neighbourhoods such as ours are being completely ignored by the authorities that approve such dwellings. Like so many other residents in Allambie Heights, we have lived here for over four decades, have raised our family here and witnessed new families moving into the area to enjoy the lifestyle that we have enjoyed. Yet all of that is now under threat by rapacious developers who care little for peace and serenity and who are only interested in carving our once delightful suburb into a medium density area, something this community has resisted successfully in the past.

We implore Council to do all it can to resist such developments before we and other suburbs within the Northern Beaches become modern day ghettos.

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