
Sent: 25/03/2018 10:18:25 PM

Subject: Submission - DA2018/0149 - proposed boarding house development - 60 Binalong Ave Allambie Heights

Subject: Proposed Development at 60 Binalong Avenue, Allambie Heights (DA2018/0149)

We'd like to express our concern regarding the proposed development at 60 Binalong Avenue, Allambie Heights (DA2018/0149).

The development is **Out of Character** for delivering affordable housing in NSW. The proposed development is NOT meeting the "local character" test in the ARH SEPP and is NOT compatible with the character of the local area or the harmony with the buildings around it.

It does not respond to the qualities of the surrounding neighbourhood under affordable housing rules. The development is too big, WILL substantially increase traffic due to the lack of regular bus services in the area, is not allowing for enough off-street parking, endangering children on a main school-route.

Boarding houses are necessary but only when they are located appropriately and close to community and transport and support services, which this is NOT. This boarding house is clearly in the WRONG location for the reasons below and the Northern Beaches Council has legitimate grounds for refusing its consent to this development application:

The proposal's physical impacts on surrounding developments is NOT acceptable.

Adding 36 dwellings, with up to 66 tenants where one lady used to live in a single-story house, surrounded by bush and family only dwellings is not suitable because of:

Traffic, Parking and Transport Constraints - The proposed development presents serious road and traffic related safety risks to tenants and other local residents.

Proximity to Public Transport & Not allowing for enough on-site Parking

I understand a key criterion for boarding houses in R2 Low Density Residential Zones is that they are located close to public transport services. In this case, the proposed development submits that is located within 400m walking distance of a bus stop used *regularly* between *6am and 9pm Monday to Friday* and *8am to 6pm weekends*.

The bus service along Allambie Road does NOT meet this criterion. None of the bus stops along Allambie Road can be characterised as high volume or major bus stops, including the bus stop closest to 60 Binalong Avenue. The main bus service commuting residents to and from the city is the E66 which runs from approximately 6am – 9am and 4pm – 8pm Monday to Friday making it impossible for shift-workers such as nurses and police officers to live at this location without having a car.

In the mornings, the E66 service is often at full capacity and buses frequently did not stop or are very late. Clearly, this is not an adequate bus service to the City for tenants of a Boarding House relying on public transport such as shift-working nurses, police officers and firemen/women.

Allambie Heights and this development in particular is geographically situated along a steep hill, **more than 1600 meters and significant vertical meters** from Condamine Street where regular bus services exists, thus making it a necessity to have a car for every resident living in this location.

The transport close by to this over-development is inadequate for shift / key workers thus people such as police, nurses, fire men/women would not be able to live in this boarding-house without having a car, thus the development would need to be able to accommodate a minimum of 30 car parks.

Not allowing for enough off-street parking and increased traffic – safety risk

Thus having 36 dwellings, allowing for 66 individuals it's absolutely unrealistic to only accommodate for only 7 car parks and 7 motor bikes for tenants. Only allowing for 7 car parks with this lack of Infrastructure to support such a building is NOT acceptable.

As a result this development will add a possible additional 66! cars to the local neighbourhood. Considering the very steep Binalong Avenue has double lines in the middle running from the location of the development for another 200m, where will these cars park? There is inadequate parking in the vicinity for an over- development of this size.

The increased traffic and parking of a possibly additional 66 cars will not only cause huge impact on the increase traffic and parking but since the boarding house is located on a school-route (school bus passes right out-side the boarding house) which goes down Binalong Avenue the increased traffic is a major danger for school children.

There is no footpaths along Binalong Ave so increasing traffic by 66 cars in this single-family dwelling only neighbourhood, if this development were to go ahead the council would have to in order to allow for the increased traffic and danger to the local community

1. Create footpath along all of Binalong Ave which is a main school-route and also the road for the local school bus and
2. Add at least two speed-humps to the very steep Binalong Ave around number 59 and 65 Binalong Ave.
3. A roundabout or other safety measure at the intersection of Jennifer Avenue and 60 Binalong Avenue to reduce the increased risk of accidents occurring at this location

Noise: We are concerned about increased noise levels arising from the size and density of up to 66 individuals living where one lady used to live, of the proposed development. The Environmental Health Referral Response stated that *'it is relevant to comment on the associated noise of closing doors and starting cars potentially 24/7 the impact of the potential intensity of use of what existing residents would have reasonably expected in a quiet residential street'*. Due to the geography of the surrounding area and the valley between Binalong Avenue and Goondari Road, an increase in street noise affects more than just neighbouring properties and is amplified down Binalong Avenue impacting a greater number of residences.

Dear Northern Beaches Council, please reject this over-development as in March 2018, the Northern Beaches Council supported the need for affordable housing but it must be in properly planned and correctly zoned areas with the infrastructure to support. This over-development does not fit this criterion.

We submit that the proposed development is NOT COMPATIBLE with the character of the local area as described above and the Council is obliged to refuse its consent under s16A of the AHSEPP.

In particular:

- The proposed development is for 6 single rooms and up to 30 double rooms. A maximum of one resident is permitted per single room and a maximum of two residents is permitted per double room. This implies a maximum of 66 tenants over 1708sqm. This increases the ratio

of residents from 1 resident for every 120sqm (conservatively) to 1 resident for every 26sqm - a five-fold increase. This is NOT COMPATIBLE with the character of the local area.

- The design examples of neighbouring properties FAIL to demonstrate that the proposed development is compatible with the character of the local area. The design examples are primarily of two storey residential un-detached homes. The plans include few examples of single storey un-detached homes that also surround the proposed development. **There are also NO apartments and NO detached dwellings in the immediate vicinity of the proposed development.** Even under a broad interpretation of design, a 36-room boarding house is NOT compatible with the character of the local area. **It will have an unacceptable impact on neighbouring residents based on key amenity issues such as visual impact, noise and privacy.**

- The proposed development contemplates 9 car spots (1x manager and 1x accessible). In addition, there are 7 motorbike spots and 6 bicycle spots. Even if these spots are *conservatively* allocated to tenants (1 car = manager, 8 cars = 16 tenants, 7 motorbikes = 7 tenants, 6 bicycles = 6 tenants), **its implies up to 35 tenants will not have access to off-street parking and will, out of necessity, park private vehicles on adjacent streets.**

While a parking provision of 0.2 private vehicles technically complies with the AHSEPP, **it is grossly inadequate and NOT COMPATIBLE with the character of the local area.** As stated in the Environmental Health Referral Response *'based on some other developments which have become effectively one bed room home units ... the car parking required by the Government standard may be inadequate meaning that residents will park on surrounding streets'*. The character of the local area will be adversely affected by the increase in private vehicles requiring parking, the increased flow of traffic and associated noise levels.

It should also be noted that images of parked cars on the plans is misleading. In all pictures, images of **cars are parked at the intersection of Jennifer Avenue, Binalong Avenue and Nargong Road which is not permitted.**

_ There is insufficient landscaping on all three street frontages along Jennifer Avenue, Binalong Avenue and Nargong Road. This is not harmonious with the surrounding landscape and the character of the local area as a green and leafy suburb.

The proposal's appearance is NOT in harmony with the buildings around it and the character of the street (compare building height, bulk, scale, setbacks and landscaping to existing developments

The local area is characterised by single level dwellings or double storey residential dwellings.

In the proposal 36 dwellings (up to 66 residents) will be built where, for the last 50 years, one single lady has lived.

The local area is characterised by low density dwellings occupied by single family units. This is typically families or older couples whose adult children no longer live them.

- The landscape of the front setback is not compatible with the street in which the building is located
- The proposed over-development is out of character with the surrounding neighbourhood. The street/area/neighbourhood is zoned as R2 Residential Low Density - the proposed boarding house is medium to high density not low density
- The proposed boarding house is a block of 'micro units'. Micro units are suitable for medium to high density zoned areas but are out of character in this street and neighbourhood where single dwelling homes currently exist.

Rubbish Collection

There is inadequate kerbside room for rubbish collection. This creates a traffic hazard in this quiet residential street.

Bushfire Assessment. We are concerned that there may be inadequacies or erroneous assessments made in the Bushfire Risk Assessment and await the referral response from the Rural Fire Service.

In conclusion, and for the reasons stated above, we OBJECT to the proposed development at 60 Binalong Avenue, Allambie Heights (DA2018/0149) and strongly believe the Council has legitimate grounds for refusing the proposed development as the development as Out of Character – delivering affordable housing in NSW as it's too big, WILL substantially impact the neighbourhood with increase traffic due to the lack of regular bus services in the area, is not allowing for enough off-street parking, endangering children and is out of character for delivering affordable housing in NSW.

References:

Gosford Council's refusal in May 2014 of the Boarding House application. Land and Environment Court's decision "the proposal did not fit the area's character"

Bankstown council in 2015 became the first council in the state to use the courts to stop boarding houses being constructed in low-density residential areas. The boarding house development did not respond to the qualities of the surrounding neighbourhood under affordable housing rules.

Warringah Council 2018 – 31 Forest Way, Frenches Forest "the development does not respond to the qualities of the surrounding neighbourhood under affordable housing rules and does not allow for more than 6 car spaces for a 24-room, 2-storey building. Three times the size of a large house – on a single block



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