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Subject: Online Submission

05/03/2018

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

To the Northern Beaches Council,

We wish to express our concern regarding the proposed development at 60 Binalong Avenue, Allambie Heights (DA2018/0149). We are supportive of the need to create social and affordable housing in NSW, however, we don't believe this proposed development is an appropriate application of the State Environmental Planning Policy (Affordable Rental Housing) 2009 (AHAHSEPP) for the reasons set out below.

We believe that the Council has legitimate grounds for refusing its consent to this development application and make the following submission:

1. THE DESIGN OF THE PROPOSED DEVELOPMENT IS NOT COMPATIBLE WITH THE CHARACTER OF THE LOCAL AREA.

Section 16A of the AHSEPP states that a 'consent authority must not consent to development ... unless it ... is compatible with the character of the local area'. The AHSEPP does not provide a definition of 'character of local area'.

As residents within the immediate area of the proposed development and as residents of the broader local community of Allambie Heights for the last eight and a half years, we are positioned to provide the Council guidance on the characterisation of the local area:

a) The local area is characterised by single level dwellings (such as our own located on Binalong Avenue) or double storey residential dwellings.

b) The local area is characterised by dwellings occupied by single family units. This is typically families or older couples whose adult children no longer live them. Increasingly, young families (such as our own) are moving to Allambie Heights attracted to the local community's schools and proximity to beaches.

c) The local area is characterised by residential blocks typically ranging in size from 600sqm - 800sqm. Each dwelling typically comprises 4-5 people (including, in many instances, children) for every 600sqm - 800sqm blocks.

d) The local area is characterised by dwellings with one to two allocated off-street parking spots by way of a carport or lock-up garage. Typically, each adult resident owns or has access to a car given that Allambie Heights is NOT a transport hub or along a major transport line. As a result, the ratio of cars to adult residents ranges

from 1:2 to 1:1, with cars typically parked off-street.

e) The local area is characterised as a green and leafy suburb with many beautiful gum trees and native plants, and lots of lovely gardens and planting by residents on their properties.

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), it 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.

- The visual impact of the proposed development is imposing, not just for neighbouring residents but also for pedestrians and passing motorists. 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.

2. THE PROPOSED DEVELOPMENT PRESENTS SERIOUS ROAD AND TRAFFIC RELATED SAFETY RISKS TO TENANTS AND OTHER LOCAL RESIDENTS.

We are very concerned about the road and traffic related safety risks presented by the proposed development for the following reasons:

a. Binalong Avenue is a steep residential road that intersects Jennifer Avenue at an awkward angle. For motorists driving north along Binalong Avenue, it is difficult to see oncoming cars approaching from the west on Jennifer Avenue. For motorists driving north-east along Jennifer Avenue, it is difficult to see oncoming cars turning onto Jennifer Avenue from Binalong Avenue (due to the slope of the road). This intersection is further complicated by the intersection at Jennifer Avenue and Nargong Road which is in close proximity and also at an awkward angle.

We are very concerned about the increase safety risk to motorists, tenants, nearby residents and other pedestrians arising from the size and density of the proposed development and limited parking provision. A proposed development of this size and density will require a roundabout or other safety measure at the intersection of Jennifer Avenue and Binalong Avenue to reduce the increased risk of accidents occurring.

There are no paved or sealed footpaths along Jennifer Avenue, Binalong Avenue or Nargong Road. Pedestrians, often parents with prams, school-age children and dog-walkers, frequently walk on the road because the surface is otherwise uneven and grassy or rocky. We are very concerned about the safety risks to pedestrians arising from a proposed development of this size and density. This risk is amplified on Binalong Avenue due to the steepness of the road and the awkward angle at which it intersects Jennifer Avenue. A proposed development of this size and density will require paved or sealed footpaths to be constructed along all roads adjacent to the proposed development to mitigate this risk.

3. OTHER CONCERNS:

a. Proximity to Public Transport. We 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. Local residents continue to complain to relevant transport authorities and representatives about the inadequacy of the bus services to and from Allambie Heights.

Allambie Heights is geographically situated along a hill, and it is a challenging walk or bicycle ride and a fair distance to the main arterial roads - Warringah Road and Condamine Street.

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. Frances caught this bus for 7 years to commute to work from Allambie Heights to Wynard Station or Pitt Street Mall. In the mornings, the service was often at full capacity and buses frequently did not stop or were very late (and this was before road works associated with the Northern Beaches Hospital).

Too frequently, Peter would pick Frances up from the Allambie Heights bus stop because it was late or didn't stop and drive Frances down to Manly Vale to catch another bus. In the evenings, Frances often caught a bus back to Manly Vale instead of Allambie Heights because the E66 service runs at 20 to 30 minute intervals which in our view is infrequent at peak times. Peter would then pick Frances up from Manly Value and drive home.

Clearly, this is not an adequate bus service to the City for tenants of a Boarding House relying on public transport.

b. Noise Management. We are concerned about increased noise levels arising from the size and density 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.

c. 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.

4. SUMMARY

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 for the following key reasons:

1. The size and scale of the proposed development is NOT COMPATIBLE with the character of the local area.
2. The proposed development does not adequately address or mitigate the adverse visual and noise impacts to existing residents.
3. The proposed development does not adequately address or mitigate the increased traffic and pedestrian safety risks to existing residents and new tenants.
4. The proposed development exposes a deficiency in the AHSEPP relating to off-street parking. The current minimum requirement is GROSSLY INADEQUATE in areas that are not major transport hubs or along major transport lines. This legislative deficiency must first be dealt with at a higher level before proposed developments of this nature are approved.

Many thanks for your consideration,
Peter and Frances Atkins