

The Greenwich Community Association made a brief submission on the 266 Longueville Road development in June 2019.

With the very changed development profile for the area since our submission, we have registered to address the Panel tonight about our elevated concerns.

For reasons that I will outline, the GCA is of the view that the DA should be refused.

The proposed use of the 266 site for a seniors' housing development has been in the pipeline for Lane Cove Council since at least 2015.

A project that has been under consideration for such a long time should not be approved for this reason alone.

Nor should it be approved simply because Council has signed an agreement for lease with Australian Unity.

The Seniors' SEPP allows for significant exemptions from standard planning controls.

The SEPP should not be invoked to allow the use of a site for a purpose that is no longer needed to meet demand for seniors living accommodation in the Lane Cove LGA

Nor should it be used to allow a development that will be unacceptable, given the similar developments, approved or proposed, within close proximity to the site.

The Panel does not need to approve the current DA just because a Site Compatibility Certificate has been issued.

Clause 24 (3) of the SEPP is very clear in this regard:-

(3) Nothing in this clause—

(a) prevents a consent authority from—

(i) granting consent to a development application to which this clause applies to carry out development that is on a smaller (but not larger) scale than the kind of development in respect of which a site compatibility certificate was issued, or

(ii) refusing to grant consent to a development application to which this clause applies by reference to the consent authority's own assessment of the compatibility of the proposed development with the surrounding environment, or

The panel will be aware of the several developments approved or proposed adjacent to the Northwood Road/ River Road/Longueville Road junction - the Pathways development, the Council's Sport and Recreation Facility on the golf course site, the expansion of Hammond Care's Greenwich Hospital to include seniors' housing, the development of the Billy Blue site at 33 Greenwich Road for residential aged care and 2 Greenwich Road for seniors' housing.

These developments will create a raft of pressures on infrastructure – traffic and green open space being key issues - where there is no capacity to ameliorate them.

The additional pressure that will come with the 266 development will result in a development that will be incompatible with the surrounding environment and it should be refused.

Even using Lane Cove Council's own benchmark we have reached what Council described only last month as concentration threshold.

I quote from a report to Council just two weeks ago

It is still considered that there should be a *concentration threshold* for the provision of age care development under the seniors SEPP, so that once a certain concentration of developments has been reached within a set area e.g. 2 square km, the SEPP should no longer apply. This is because the SEPP is sometimes used in order to access the concessions granted and areas can ultimately end up with an oversupply of seniors housing, placing demands on services and unintended, out-of-character built form outcomes.

The GCA is of the view that this is exactly what will happen if 266 proceeds.

We have already reached this concentration threshold in the 2 sq km area around 266 Longueville Road.

Based on Council's own figures in its feasibility study in 2015 there will be a demand for 140 retirement living units to 2031.

We already have 263 seniors living units approved and/or under construction with 2 km of 266 Longueville Road.

Of the 82 independent living units proposed for 266, 33 will be 2-bedroom dwellings.

Many residents in these 2 bedders may be couples and some may have an adult living in the second bedroom.

It is quite conceivable that all 3 residents may go to work and they may all drive cars.

On this basis, the proposed 122 car parking space provision in the development will be totally inadequate.

The adjoining streets will be parked out even more than they are now by 266 residents who have no car spot.

We acknowledge that lack of car parking spaces, will not, of itself, ground a refusal of consent under Part 7 Division 4.

However, the impact of additional vehicles coupled with the increased number of traffic movements in the area, should be considered seriously in terms of the Panel's decision-making power under Clause 24(3).

And we wish to draw the Panel's attention to the fact that Mr Montgomery states on page 7 of his report of 4 August that Bitzios has found Varga's revised traffic modelling and assessment acceptable.

Where is this report? – we have not had an opportunity to review its assumptions.

We are concerned to read that the applicant has sought a reduced payment of the Section 7.11 contributions for the development.

Whichever way you look at it, the number of residents in the new facility and those who visit them will increase demands on public amenities and public services in the LGA.

Given the loss to the community of the large swathe of open space at 266, a park of 430 sq m is a very small provision of publicly accessible open space by way of compensation.

And the benefits will not be one way – the park will enhance the appeal of development as much as it will provide recreation facilities for the community.

The scale of the development will generate demands for services and amenities that justify a full Section 7.11 contribution.

Just as Council has not allowed developer funded infrastructure to be offset against Section 7.11 contributions in St Leonards South, nor should it do so for 266.

Given the estimated cost of the project relative to the \$1,560,474.40 required in Section 7.11 contributions, it is disappointing that the developer even raised this concern.

We are also concerned that the draft Consent Conditions do not reflect the rigour applied to other seniors' housing developments recently approved in the LGA, namely Pathways and 2 Greenwich Road.

These include

Accessible Design standards

Excavation Greater Than 1m Depth provisions to protect surrounding properties and

identify vulnerable structures

Construction Methodology Report

The Delapidation Report clause is deficient and does not offer the protection offered in other DA's

Operation of Plant and Equipment to provide acoustic protection for neighbours

Noise Controls.

And the draft Consent Conditions do not include the condition required pursuant to Clause 18(2) of the SEPP – the condition that must specify the kinds of people who may occupy the accommodation proposed in the development.

I am aware that others will raise the concern that the applicant has sought to water down the required allocation of affordable housing accommodation so I do not propose to address this issue.

In summary, I request the Panel to refuse this DA.