



*PRESERVING AUSTRALIA'S OLDEST GARDEN SUBURB*

*P.O. Box 85, HUNTERS HILL, N.S.W. 2110*

21 March 2018

Barry Smith  
General Manager  
Hunters Hill Council  
Alexandra St  
Hunters Hill

Dear Barry,

**Re DA20181009 - Affordable Rental Housing at 2 Flagstaff St Gladesville**

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**Affordable rental housing**

The Hunters Hill Trust fully recognises the need for the provision of affordable rental housing in Sydney and we are not opposed to affordable housing being located in the Hunters Hill LGA where the zoning is appropriate. As well, we are not opposed to Boarding Houses being built in Hunters Hill.

**THE DA FOR 2 FLAGSTAFF ST**

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We have examined the documentation of the proposal at 2 Flagstaff Street and report as follows:

**Documentation drawings**

- We note that the DA drawings are poorly drawn and lack clarity, which does not make assessment of the proposal straight forward.
- The elevation drawings are particularly badly drawn and do not attempt to show how the building will appear in three dimensions, nor do they clearly articulate the various materials proposed.
- In the drawings available on Council's website there is no indication of how the building sits in its context.

**The Site**

- The site is splayed a narrow block, which is only 9.14m wide at the back, with an area of 450m<sup>2</sup>.
- The width of the block is considerably less than the 15.2m, which is the common subdivision width that dates back to the 50ft x 150ft standard block
- Note that the area is substantially less than the minimum 700m<sup>2</sup> allowed for subdivision in this area, which is zoned *R3 medium density residential*.
- The floor space ratio allowed for this site is 0.9:1

### **The accommodation in the proposal**

- The proposal is for 13 units, each of which contains a bed-sitting room, a kitchenette and its own bathroom.
- Two of the ground floor units are designated “Disabled Access”.
- Another unit is designated as a manager’s unit.
- On the ground floor is a small “Shared Private Open Space” and an even smaller “Common Area”.
- There is provision for 4 off-street car spaces in a basement carpark.

### **THE HUNTERS HILL TRUST OBJECTS TO THIS PROPOSAL FOR THE FOLLOWING REASONS:**

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#### **It is not a Boarding House**

This proposal is not really a boarding house, which usually has shared kitchens and bathrooms for those boarding in its rooms. The tiny “Common Area” and the “Shared Open Space” on the Ground Floor are tokenistic to say the least. Instead this is in reality a block of *Studio Dwellings*, or *Bed-Sitting rooms*.

#### **It is not Affordable Rental Housing**

This proposal has been submitted under the SEPP Affordable Rental Housing. We do not accept that this is affordable rental housing because there is nothing either in the LEP definition or in the SEPP to determine a rent cap that might be applied to these Studio Units. They will be rented out at the going market rate.

Despite that, we accept that the proposed accommodation consisting of “studio dwellings” is an appropriate use for this area and does provide a housing type that is more affordable than units that include separate bedrooms and living areas etc.

#### **Rentable housing units become privately owned**

While the SEPP states that such accommodation “cannot be subdivided by Strata or Common Title”, there is no reason why a so-called Management Company could not sell shares in itself with 1 share for each unit, which could be bought and sold at the market rate. There is nothing to say the units must continue to be rented out.

#### **Non-compliance with the LEP**

This proposal represents a massive overdevelopment of this site and does not comply with the key controls for development in this area that are set out in the LEP, like, for example:

##### *The Minimum Site Area:*

- The site has an area of 450m<sup>2</sup>, which is only 64% of the 700 m<sup>2</sup> minimum site area allowed for subdivision in this zone.

##### *The Maximum Floor Space Ratio*

- The allowable maximum FSR for a site in this area is 0.9:1. This is based on the premise that the site will comply with the minimum site area.
- This proposal has a FSR of 1.1:1, which does not comply with the 0.9:1 maximum even if the site itself complied with the minimum area. The applicant has put forward a spurious reason to allow it to exceed 0.9:1, without any justification or acknowledgement of the fact that the site is less than the minimum allowable subdivision area.

#### **Non-compliance with DCP Minimum for off-street parking**

The proposal has only 4 off-street parking places for its 13 units. Were it not self-designated as a boarding house, the 13 units would be classified as studio dwellings and under the DCP each unit would require one off-street car space, i.e. 13 spaces.

### *Car spaces – actual requirement*

It is not inconceivable that there could be at least 15 or 16 cars owned by residents, which means there will be 11 or 12 cars looking for long term on-street parking in the immediate neighbourhood. You won't find parking spots in Flagstaff St or in any of the nearby streets, which already have significantly restricted on-street parking available.

### **The location**

Flagstaff Street is not a residential street and will become more and more busy with more and more cars parking in the GSV site and more and more service vehicles using the street as the various developments in the vicinity come to fruition.

As well, Flagstaff St is not a pedestrian friendly street. It has designated pedestrian access on one side of the street only.

On top of this, the new development on the GSV site will cast shadows over much of Flagstaff Street for much of the day.

Flagstaff Street also has no real street presence and subsequently is not the most appropriate location for a residential housing development.

### **The design**

The design is poor and is mainly predicated on attempting to get the maximum development onto a below minimum site by attempting to bend the planning rules.

### *Room layouts Ground Floor*

The ground floor is partially excavated on the northern side. The 5 units have bathrooms that are mechanically ventilated in two of the units and all the kitchens are mechanically ventilated.

As a result:

- There is no allowance for natural cross ventilation of the units.
- The units open onto a narrow paved terrace on the northern side of the building, will be overshadowed not just by any similar development on the adjoining property but also by the boundary fence between them.
- Access to 3 of the units and the Common Area is via an external uncovered walkway, which gives no shelter when it's wet
- Layouts of 3 of the units are really clumsy and mean that much of the space is taken up with access ways.

### *Room layouts 1<sup>st</sup> and 2<sup>ND</sup> Floors*

- There is a similar lack of natural ventilation to two of the bathrooms and a lack of cross ventilation to three of the units.
- There is no lift and the first and second floors are accessed by a single flight of stairs, which makes these two floors virtually inaccessible to the aged and infirm.
- There is no secondary emergency exit from either of these floors in case of fire or some other catastrophe.
- Their windows and balconies open onto the next-door property to the north, means they will be overshadowed by any future development on the adjoining site. As well, the windows and balconies will pose a privacy issue for that site no matter what is built there.

### **Adverse impact on the surrounding community**

The main impact on the surrounding area will flow directly from the increase in population and the consequent need for residents of the unit block to park their vehicles.

Other adverse impacts could also flow from unauthorised use of the units for short-term tourist accommodation (Airbnb).

The proposed building does not offer any so-called “architectural excellence” and as such will have a negative impact on the existing streetscape.

## **CONCLUSION**

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### **The Hunters Hill Trust objects to this proposal because:**

- It is an overdevelopment of the site, as clearly shown by its non-compliance with a number of significant planning controls in the Hunters Hill LEP and DCP.
- The site is too small for this level of development.
- The location, in an increasingly busy Gladesville shopping area service street, is not appropriate for this type of development
- The design of the layout is poor and, because of its lack of alternative emergency exits, it is a potential disaster site if there is a fire.
- It will have an adverse impact on the amenity of the surrounding neighbourhood, particularly because,
  - It does not include sufficient car parking
  - It will overlook the adjoining property to the north.
  - It lacks any architectural merit.
  - It will prohibit the potential amalgamation of this site with one or other of its neighbours, which would allow a more rational re-development of the site.
- This proposal, like a number of recent similar proposals under the SEPP Affordable Rental Housing, is an attempt to use the SEPP to overdevelop small sites that are too small to be successfully redeveloped for home unit development.

**The Hunters Hill Trust urges Council to reject this Development Application in its entirety.**

Yours faithfully,



Tony Coote  
Vice President  
The Hunters Hill Trust