



THE ENTRANCE PENINSULA

COMMUNITY PRECINCT

ENCOMPASSING: THE ENTRANCE; THE ENTRANCE NORTH; LONG JETTY TOOWOON BAY; BLUE BAY; SHELLY BEACH & MAGENTA

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14th September

Michael Whittaker
The General Manager,
Wyong Shire Council,
PO Box 20,
Wyong 2259

Subject: **REVISED DEVELOPMENT APPLICATION NO.308/2011 35 - 41 WILFRED BARRETT DRIVE THE ENTRANCE NORTH - RESIDENTIAL FLAT BUILDING CONSISTING OF 44 UNITS (SEPP AFFORDABLE RENTAL HOUSING)**

Dear Michael,

I am writing to you on behalf of members from The Entrance Peninsula Community Precinct (TEPCP) and Save The North Entrance Action Group who have previously submitted to you submissions which strongly raised objections to the proposed development and which we request, to be applied in the consideration of the revised DA.

Further, I have been contacted by many residents whose properties are located in close proximity to the proposed development (Terilbah Place, Wyuna Pde, Hutton Rd and Curtis Pde) and who have received notification of the revised DA, to confirm with you that their previous written objections will be included in the assessment of the revised DA.

TEPCPC concludes that despite the reduction from 55 units to 44, inclusion of pitch/gable roofing on the buildings facing Wilfred Barrett Drive and relocating the exit driveway and carriageway within the proposed development, the revised DA is still totally inappropriate in the North Entrance locality.

It is obvious that the high density development is totally out of character with the low density residential oceanfront and lakeside neighbourhood regardless of the small changes made in the revised DA. The negative impact on the natural environment, including the lake and the lakefront, is still significant. Furthermore, we reiterate our original concern that by placing the tenants at The Entrance North they will be geographically isolated from vital services and social activities: shopping centres; medical centres; schools; TAFE and other training providers; employment; clubs; sporting organisations; markets and other sources of entertainment.

Following are TECPC's additional concerns arising from the submission of the amended DA 308/2011 for 35 - 41 Wilfred Barrett Drive, The Entrance North, NSW.

CONTAMINATION AND REMEDIATION

The amended DA cites comments made by WSC when assessing a previous development application (DA 856/2009) dated 4 August 2010 for a three lot residential subdivision on the subject land, and assumes that as there was a due diligence investigation by Council that resulted in finding no contamination then, and as there has been no additional filling since the development consent was granted, that, "...no further consideration of site contamination would appear to be necessary."

We believe that it is essential that a new investigation by Council be conducted. The proposed development is completely different from the approved 3 residential blocks for the site. The DA under review has a larger footprint, is a high density development and includes excavation for basement parking.

Therefore, we again stress that due diligence investigation by Council is warranted. Furthermore, it was our understanding that Council is obliged to perform a thorough investigation for each and every development application.

An eight lot residential subdivision was previously rejected by WSC. What were the grounds for such a rejection?

CRIME PREVENTION

The comments in our original letter dated 22 May 2011, still apply to the amended DA, in particular those pertaining to domestic violence and attempts to create a greater social mix.

Natural surveillance, exterior lighting and off street parking, as cited in the amended DA, may contribute in a small way to limiting crime. However, the bigger issues are the impact of poverty, low education levels and high unemployment on crime and violence. One suggestion by the developer has been to create a broader socio-economic mix of residents in this development, however, the percentage mix is heavily weighted in favour of the socially disadvantaged. As a result, the reality will be very few middle - higher income residents, if indeed any, will be attracted to such a development despite the allurements of waterfront units.

Furthermore, an important assumption in the success or otherwise of a greater social mix is that tenants are living in an area where employment is the norm rather than the exception. Firstly, the tenants are highly unlikely to mix with the surrounding residents given the appalling contact and communication by the developer with the surrounding residents, many of whom are self-funded retirees, self-employed or work out of the area. Secondly, as a result, the tenants will be mixing with other unemployed tenants as there are no employment opportunities at The Entrance North and very limited work at The Entrance.

As mentioned previously, the location of affordable housing tenants at North Entrance is likely to result in difficulties in integrations, as there has already been strong opposition and objections expressed by the local community against the affordable housing development. Further, the very considerable distance for tenants to access shopping centres, clubs, TAFE, employment hubs will further add to their isolation.

What guarantees can be given that the affordable housing block in its isolation from the local community and access to services, does not become a concentration of welfare dependency and that the community does not suffer increased incidents of crime and violence emanating from this concentration of socially disadvantaged?

ACCESS AND WILFRED BARRETT DRIVE

We note the change to the entry and exit to/from the development but still have concerns regarding safety, noise pollution for the adjoining residents, and limited access for larger vehicles, including emergency trucks, caused by the roof overhang across the driveway access to Wilfred Barrett Drive.

The Central Coast Highway is heavily congested during morning and afternoon peak hours, so access to and from the proposed development will still indeed be problematic and increase the potential for accidents in this busy section of Wilfred Barrett Drive.

We are aware that the RTA has identified problems in the original DA and anticipate that they will assess the changes made in the revised access to Wilfred Barrett Drive and traffic carriageway within the building complex. ***We would appreciate notification of the RTA's assessment .***

INACCURACIES IN THE SOCIAL IMPACT ASSESSMENT

TEPCP considers that the Social Impact Assessment submitted with the revised DA is superficial and lacks substantive evidence. We believe that there is a lack of vigorous and thorough assessment of the social impact on the people and the community of The North Entrance.

Different Demographic Profile

Contrary to the conclusion in the social assessment, the infill affordable housing does **not integrate** with the surrounding community, not only in design of the building experience but also in terms of the people and the community. According to the developer's social impact assessment "*tenants of the development will be low income persons typical of the cross section of the existing community profile.... The proposed affordable housing development does not result in a significant change in the locality – in this case the largest group representative of (matches) the existing community profile.*"

However, we are aware that there is a **significant demographic difference** between the potential tenants and the residents of neighbouring properties. The locality of the proposed development is an **exception** to the existing community profile of Wyong Shire. There is no doubt that there will be significant differences in the demographic profile of the affordable housing tenants to the much wealthier residents, in this expensive and exclusive seaside and lakeside neighbourhood.

The proposed affordable housing site is located in one of the wealthiest localities in the Wyong Shire. In Terilbah Place, Wyuna Ave, Hutton Rd and Curtis Pde; over 85% of the properties are owner occupied, residents are employed and/or self funded retirees. The value of the properties in this locality are in the vicinity of \$550,000 - \$1.5+mill. The architect in the original DA, mentioned that he had not visited the site and from the inaccuracies in the social impact assessment, we can assume that a visit to survey the neighbourhood and residents has not been undertaken.

Problems of Internal Integration within Proposed Complex

The DA has 50% of the units earmarked for affordable housing, and the remainder including the lakefront units for private ownership. It is evident therefore that there will be a lack of internal integration and conflicting neighbourhood character within the proposed development itself. The proposed private units will be exclusive, as they will be the only lakefront apartments available on Tuggerah Lakes .

How does affordable housing for low income persons, integrate and sit comfortably within the same complex with private ownership of valuable exclusive lakefront apartments ?

What guarantee is there that all 44 units do not eventually become affordable housing units? The obvious problems in combining 50% affordable housing tenants and 50% private ownership of lakefrontage units will likely result in the entire development being available for affordable housing?

High Community Apprehension

Contrary to the inaccurate assessment of "low" community apprehension to the proposed high density DA with affordable housing, the existing neighbourhood community has vehemently expressed their objection and concerns regarding the proposed development: 3 Public Meetings;

450+ signatories to a Petition; and 90+ letters of objections. The affordable housing units are out of character with the local neighbourhood demographics and high valued coastal and lakeside properties.

Negative Impact on the Value of Neighbouring Properties

Again contrary to the “low” impact on property values recorded in the Social Impact Assessment, real estate agents have estimated that the value of neighbouring properties are likely to fall by 15-20+% depending on their proximity to the affordable housing units.

The social impact assessment states that the... “ *potential of adverse social impacts is low and appropriate measures have been recommended to minimise the potential for significant impacts....provide evidence for this conclusion and details of appropriate measures*” is inaccurate and vague.

What are these appropriate measures referred to by the developer and how can these correct the negative social impacts, which have already resulted from the submission of the DA 308/2011?

In conclusion, TEPCP reiterates that the proposed development is an inappropriate development for The Entrance North and is totally out of character with the neighbourhood. Further, there is little chance for integration as there has already been a strong expression of apprehension and distress by the local community.

Therefore, for these reasons and those which we have highlighted in this and our previous submission, we strongly recommend that DA No 308/2011 is rejected. Further, that our recommendation be referred to the two Wyong Shire representatives on The Hunter and Central Coast Region Planning Panel.

We thank you in anticipation.

Regards

Vivienne Scott
Chairperson
The Entrance Peninsula Community Precinct

Anne Rowland
Deputy Chairperson
The Entrance Peninsula Community Precinct

CC All Councillors
Chris Spence MP