

We write to provide feedback on and express our extreme concerns regarding DA56190/2019 LA DP366607 MELBOURNE ST EAST GOSFORD.

**Upon review of the Statement of Environmental Effects we note:**

**5.1 Gosford Local Environmental Plan 2014:**

- **R1 Zone Objectives** • To provide for the housing needs of the community. • To provide for a variety of housing types and densities. • To enable other land uses that provide facilities or services to meet the day to day needs of residents. • To ensure that development is compatible with the desired future character of the zone. • To promote best practice in the design of multi dwelling housing and other similar types of development. • To ensure that non-residential uses do not adversely affect residential amenity or place demands on services beyond the level reasonably required for multi dwelling housing or other similar types of development: The development is not consistent with the future character, nor the existing character of the area. This would be the second largest development after the units at 39-43 Melbourne Street. As such, there is no comparative development within the immediate streets that would validate this statement.
- **Clause 4.3 Height of buildings - 8.5m:** Application is in breach. The skylight which will exceed the height limit by 80mm – 180mm is trying to be passed off as a ‘roof feature of visual interest’ and as a ‘decorative item’.

**DCP Part 3.3 – Multi Dwelling Housing & Residential Flat Buildings:**

- **3.3.2.1 Desired Character Reference to Chapter 2.1:** The proposal is not consistent with the future character of the area, nor the existing.
- **3.3.3.2.2 Deep soil and setbacks:** Application is in breach of the required setbacks/boundaries with some building elements forward of this by approximately 1m.
- **3.3.3.3.2 Carparking Requirements as per chapter 7.1 • 1.5 spaces per dwelling = 33 spaces • 0.2 visitor spaces per dwelling = 4.4 spaces Total off-street parking required = (37.4) = 38 spaces:** In the Statement of Environmental Effects, they claim 2 of the 38 spaces will be allocated as accessible parking. This is contradicted in the Traffic and Parking Impact Assessment Report where they advise that only 1 of the 38 spaces will be allocated as accessible parking. Parking in Adelaide Street, as well as surrounding streets (Melbourne and Webb Streets) is in extremely short supply both during the day and evening. We believe the parking allocations to be sorely insufficient for the proposed development and expect an instant and extreme impact on both Adelaide and surrounding streets.
- **3.3.3.4.3 Building separation 6m, deep soil areas:** Application is in breach admitting their building design is not in keeping with DCP requirements.
- **3.3.3.5.5 Private Open Space For each dwelling with a private entrance at ground level, 50m<sup>2</sup> , one area of 5m x 5m, minimum dimensions 3.5m:** Application is in breach admitting each premise will not the required amount as specified by the DCP.
- **3.3.4.1.2 Dwelling types No more than 1/3rd of dwellings same type:** Application is in breach with the amount of 2-bedroom dwellings equate to 54.5% of the proposed development. This is an enormous increase.

- **3.3.4.1.3 Accessible dwellings Minimum 10% of dwellings:** Application is in breach with NO accessible dwellings proposed. To propose such a large development in the area and not include any accessibility
- **3.3.4.5.1 Building Services Not detract from desired streetscape character:** Whilst the building services will be provided behind the building line and not visible from the street, 'waste will be collected on-street via Council's domestic waste contractor, with bins to be placed on both Melbourne and Adelaide Streets for collection'. Both Adelaide and Melbourne streets have limited frontage for placement of these bins. Currently both streets are lined with parked cars both during the day and evening. Currently bins are having to be placed across driveways of the residential premises due to the severe lack of space. The suggested waste management plan for this proposed development is short sighted and not environmentally sound. Under Part 7.2.16.4 of Gosford DCP 2013 on-street collection is available for residential developments with 18 units or less, this development is larger and therefore is in breach of this section of the DCP.

**Upon review of the Traffic and Parking Impact Assessment Report we note:**

- **2 Existing Conditions; 2.5 Public Transport, Pedestrians and Cyclists:** Report advises there is access to ferry services. This is incorrect and misleading to the point which it suggests that an entire category of public transport is available to new residents of the proposed development and existing residents of the local area.
  - o **'The site is very well located to all forms of public transport. This would minimise the need for residents to the proposed development to drive their own vehicles to and from their various activities'.** The area has only one form of public transport. Bus. – It is incorrect to suggest that residents will minimise their use of personal vehicles due to the vicinity of a bus stop. It is especially hard to believe this statement given the amount of traffic already generated by existing dwellings.
- **3 Proposed Development; 3.4 Public Transport, Pedestrians and Cyclists:** **'To improve the pedestrian connectivity in the vicinity of the development it is proposed to provide a pedestrian link through the development site from Mann Street to Baker Street'.** This is completely incorrect, irrelevant and misleading. Mann and Baker Streets are located in the suburb of Gosford, not East Gosford.
- **4 Car Parking Assessment; 4.1 Parking requirements:** We have already highlighted that this is in breach of the SCP – however we also believe the visitor parking to be insufficient. There will be a significant impact on 'on street' parking on Adelaide, Melbourne and Webb Streets. Furthermore the parking assessment doesn't take into consideration evening on street parking, which is at a significant premium already.

**Other concerns we would like to raise:**

- **Impact to local traffic with the proposed number of dwellings:** There are multiple schools, an out of school hours care and a day care centre within the immediate area that impacts on the traffic from Russell Drysdale Street through to Webb Street, Melbourne Street and Adelaide Street on a daily basis for both school drop off and pick up times.

The main entry to the Central Coast Highway for these streets is via the lights at the cross section of Adelaide Street and the Central Coast Highway.

The cycle of the lights for traffic turning onto the Highway is limited, causing a significant delay and back up of traffic from the location of the lights all the way down Adelaide Street past Webb Street and Melbourne Street as far back as Russell Drysdale Street.

Additional traffic in this area will add further congestion to this area twice a day during peak periods.

The intersection at Adelaide Street and the Central Coast Highway is notoriously dangerous to pedestrians with a spate of separate serious incidents where pedestrians have been hit in the last 6 months alone. One of which required a careflight medivac on scene. Additional traffic will further contribute to the level of danger to all pedestrians when road users attempt to negotiate the intersection.

It is also worth noting that Appendix A Traffic Counts report contains information sourced on a day where the schools, out of school hours care and child care centre were on holidays. This limited the actual and tangible vehicle movements for the area.

- **Impact to existing residential dwellings from construction:** We expect with the level of excavation required, the possible requirement of heavy articulated vehicles and cranes. We expect there to be an increase in traffic/parking issues as a result of this. We expect additional environmental impacts in terms of noise and dust. No mention of what remediation or relief if any will be offered to residents during the construction period.

**Addendum:**

It is our belief that the major cause for the existing violations of the application is due to the significant size of the development as opposed to other dwelling in the area and the direct comparison to the previous dwellings on the site. (2x Three Bedroom detached houses, this would constitute over a 1000% increase of dwellings on the site). A significantly reduced application would garner the support from the local community, but the size and scale of this application does not meet with community expectations or does it comply with many development conditions at all and are being attempted to be passed off as 'variations'. With all that being said, It's the flagrant disregard to the local community that is most concerning, the cherry-picked traffic survey, street photos, non-existent ferry service, 'visually interesting' skylights, lack of accessible housing, reduced or lack of setbacks, significant excavation works, improper waste planning. This application reads more like a joke than something anyone could ever take seriously.

We absolutely object to this development proposal.

