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24/11/2025

MR Daniel Jones
16 Edwin ST
Fairlight NSW 2094
[REDACTED]

RE: DA2025/1662 - 22 Raglan Street MANLY NSW 2095

Draft Objection - DA2025/1662 (22-24 Raglan Street, Manly)

Strongly Opposed - Overdevelopment, Out of Character, and Inappropriate in this Location

I wish to lodge a formal objection to DA2025/1662 for an eight-storey shop-top housing development at 22-24 Raglan Street, Manly. The proposal represents a significant and unjustified escalation from the previously approved three-storey scheme. It is excessive in height, bulk and scale, inconsistent with the existing streetscape, and detrimental to the local character and residential amenity.

1. Massive Increase in Height - Completely Out of Keeping With the Area

The jump from an already-contested three-storey approval to eight storeys is disproportionate and inappropriate for this part of Raglan Street.

The surrounding built form is characterised by low- to mid-rise buildings, predominantly 2-4 storeys. An 8-storey, 28.6m tower will dominate the streetscape, overshadow neighbouring properties, and create a canyon-like effect entirely at odds with Manly's established coastal village character.

2. Misuse of LMR Policy Bonuses

While the LMR reforms allow additional height with affordable housing, they were not intended to facilitate dramatic, out-of-context overdevelopment on small R3-zoned parcels.

Rewarding a height bonus for only three affordable units (just 16% of GFA) is a poor outcome that does not justify such an enormous increase in density or visual impact.

3. The Land and Environment Court Already Considered This Site

A three-storey scheme-not eight storeys-was only approved after detailed scrutiny and amendments through the Land and Environment Court.

The Court clearly assessed the site's constraints, character, and neighbourhood impacts. There has been no change in local character or immediate planning context that would justify more than doubling the height.

4. Excessive Bulk and Visual Impact

The proposal's sheer scale will:

- overshadow adjacent residential properties,
- create significant privacy impacts,
- obstruct existing view corridors,
- and introduce a bulky, monolithic structure out of keeping with the street rhythm.

The design bears no relationship to the existing form or scale of surrounding buildings.

5. Traffic, Parking & Congestion Impacts

Despite the inclusion of EV and bicycle parking, Raglan Street is already a constrained local road with:

- limited on-street parking,
- high pedestrian activity,
- and peak-hour congestion.

An eight-storey residential development will materially worsen these issues. The basement and ground-level car arrangement does nothing to mitigate the increased demand for access and circulation.

6. Poor Precedent for Manly

If approved, this proposal sets an alarming precedent for:

- aggressive height inflation,
- speculative redevelopment,
- and out-of-character densification along quiet residential streets.

This goes against the long-established planning principles that have protected Manly's amenity, character and coastal identity.

7. The Current Building Could Be Improved Without Overdevelopment

The existing structure and previously approved plans demonstrate that a sensible, modest increase can be achieved on this site.

This DA instead seeks to exploit loopholes at the expense of the local community.

Conclusion

This application is too big, too tall, and entirely out of keeping with its surroundings. It represents clear overdevelopment and a poor planning outcome for Manly.

I respectfully request that Council refuse DA2025/1662 in its current form.