
From: Glen Wellham
Sent: 20/11/2025 10:35:28 AM
To: Council Northernbeaches Mailbox
Subject: DA2025/1559
Attachments: Glen Wellham DA 2025_1559.pdf;

To whom it may concern,

Please see attached my objection to DA 2025/1559.

Cheers

Glen

OBJECTION TO DA2025/1559 – 27 EAST ESPLANADE, MANLY

From: Resident at 24 East Esplanade

To:

Northern Beaches Council

Subject: Formal Objection – DA2025/1559 (27 East Esplanade, Manly)

Dear Assessment Officer,

I am the owner/occupier of Resident, Unit 14, 24 East Esplanade, Manly, directly impacted by the proposed development at **27 East Esplanade** (DA2025/1559). I submit this formal objection based on the following concerns:

- Excessive height and visual bulk
- Significant construction impacts
- Unjustified reliance on the **Housing SEPP (State Environmental Planning Policy (Housing) 2021)** to obtain planning uplift through a minimal affordable housing contribution

These issues are outlined in detail below.

1. Excessive Height and Visual Bulk

The proposed development substantially exceeds the prevailing scale and character of the East Esplanade foreshore.

- The height breach results in a visually intrusive and overbearing structure.
- This is inconsistent with the **desired future character** for the area under the Northern Beaches LEP and DCP.
- It imposes permanent visual impacts on neighbouring properties, including mine at 24 East Esplanade.

The scale of this proposal cannot be justified, especially given the minimal public benefit offered under the Housing SEPP incentives.

2. Significant Construction Impacts on 24 East Esplanade

Given the tight constraints of the site and the scale of excavation and building works, the development is likely to create extensive impacts for immediately adjacent residents, including:

- prolonged noise and vibration
 - heavy vehicle movements
 - dust, debris, and reduced air quality
 - loss of already constrained on-street parking
 - potential structural risks to nearby buildings
 - disruption to daily access and safety
-

3. Misuse of Affordable Housing Incentives under the Housing SEPP

The applicant seeks substantial planning uplift by proposing to “**manage 2 affordable housing apartments for at least 15 years**” under **Section 21, Division 1, Part 2, Chapter 2 of the Housing SEPP**.

I strongly object to this justification because it **fails to meet the intent of the Housing SEPP** and provides a **token public benefit** in exchange for major long-term private development gains.

3.1 The proposal does not deliver genuine or lasting affordable housing

- Only **two** units in a large development are proposed.
- The units are only required to be kept as affordable housing for a **15-year period**, after which they revert fully to market-rate dwellings.
- The **capital value** of these units remains unchanged.
- The “affordable” status is achieved solely through a modest short-term discount to rental income.

This does **not** align with the policy objective of the Housing SEPP, which is to **increase the supply of affordable housing in perpetuity or over a meaningful period**, not to provide a symbolic discount for a brief time.

3.2 The uplift sought is disproportionate to the public benefit provided

Section 21 of the Housing SEPP is intended to ensure that uplift is **reasonable, proportionate and in the public interest**.

Here, the uplift sought (in height, bulk, and yield) is **significant**, while the public benefit is negligible.

Planning incentives must not be used to justify overdevelopment, particularly where the public benefit is temporary and minimal.

3.3 Temporary rental discounts do not create real affordability

A modest reduction in rent for only 15 years does not:

- meaningfully address housing affordability in Manly,
- increase long-term accessibility, or
- support low-income households in any enduring way.

This is **not** the creation of affordable housing — it is a short-term rental discount being leveraged to access substantial planning concessions.

3.4 The proposal conflicts with established planning principles

The NSW Land & Environment Court has consistently held that:

- **planning incentives must be applied in a way that achieves genuine public benefit,**
- **the scale of uplift must be proportionate, and**
- **impacts on surrounding development must not be unreasonable simply because the applicant is using an incentive-based pathway.**

This proposal fails all three principles.

It represents a misuse of the intent of the Housing SEPP, providing minimal, time-limited compliance in exchange for permanent and substantial planning concessions.

3.5 Significant impacts cannot be justified by such an insubstantial benefit

The development's impacts—excessive height, visual dominance, and long-term construction disruption—are substantial.

The temporary provision of two discounted rental units **does not outweigh** or justify these outcomes.

4. Conclusion

For the reasons set out above, I request that Northern Beaches Council **refuse DA2025/1559**.

The development:

- is excessively high and out of character,

- will cause significant construction impacts to neighbouring properties, and
- relies on a **token and temporary affordable housing contribution** to justify major planning uplifts that will permanently affect the area.

If Council is not inclined to refuse the application outright, I request that **significant amendments** be required, including:

- substantial height reduction,
- full mitigation of construction impacts, and
- removal of unjustified incentive-based uplift under the Housing SEPP.

Please keep me informed of all future correspondence and any opportunities to make further submissions.

Yours sincerely,

Glen Wellham
Resident, Unit 14, 24 East Esplanade, Manly