



To: Northern Beaches Council

To whom it may concern,

Re: Submission in opposition to DA 2020/1233

As a current resident of Watermark Apartments I wish to relay my strong objection to the DA 2020/1233 lodged by the Mounties Group for the following reasons:

No need for the project

There is absolutely no need for the development as proposed.

The overwhelming majority of the Watermark residents do not want any changes to the current bowling green and its use. There are plenty of good quality bowling greens in the area. Harbord Diggers Bowling club members are currently using Manly Bowling club's two full-sized greens (owned by Mounties) and prior to COVID-19 restrictions enjoyed the services of a free shuttle bus from the Harbord Diggers club to Manly and back. Those who wish to bowl closer to this area also have the option of playing at Harbord Bowling club, where there are four full-sized greens maintained to a high competition standard. There are also a number of unused Council owned bowling greens in the area.

Although there have been a number of submissions made by bowling club members who support the proposal, none of these supporters live in a location that would be negatively impacted by the proposal.

The DA provides very limited justification for the need to undertake the development at the detriment of the surrounding Watermark residents who will inevitably suffer from reduced privacy, amenity, security and comfort in their own private homes.

Lack of proper consultation with current Residents

The residents of Watermark were led to believe that the current grassed green was installed for the private use of the 'Watermark Residents'. They then selected and purchased their properties with this in mind. At purchase, residents were advised there would be a low-level informal green provided for the use of residents of the village, and occasional (twice weekly at most) use by the Diggers Ladies Bowling group. Residents were never informed that the area in question would become a licensed venue, open to members of the club and their guests. For this reason, the DA has been an unwelcomed surprise to residents, particularly those who will be most affected if the application proceeds.

Prior to the lodgement of the DA, Mounties Club management have misled residents through correspondence and in person, and it seems they are deliberately trying to confuse residents into thinking the proposed development will be in their best interest and will only have minimal impacts. This is untrue and the facts of the proposal; the need for it; and the operation of it in the future, should be clearly spelt out to the residents so that they have the opportunity to make considered comments on the proposal.

In the SEE lodged with this application it states that Council '*recommended that residents of the site be informed of the proposed development prior to lodgement of the application to Council*'. This did

not happen. The Residents Committee was notified by email on 25 September that a submission would soon be made to Council in relation to the Bowling Green, however, no formal information was provided and it is understood that it was not until 16 October 2020 that full details of the proposal were posted on Council's website. Residents were not notified of the lodgement of the DA by Mounties or the Council at this time, and therefore have had minimal time to gain an understanding of the proposal and seek professional advice in order to make considered submissions. For this reason, it is requested that DA be refused, or at least the exhibition period be extended to allow residents time to understand what is proposed. The Mounties Group should be requested to provide details as to how they consulted with residents about these plans and submit any correspondence made with residents to Council as part of the DA package.

Severely Reduced residential amenity

The Construction of a new bowling green on the upper ground level terrace with three lanes (31m x 15.5m); (Note: Plan of Management (PoM) identifies proposal as a Supergreen size 37x37 metres which is inconsistent) as proposed in the SEE will require the extension of the bowling green closer to private dwellings, reduction in pathway and access, reduced gardens and passive recreational space including seating and shaded areas currently used by residents and reduction in the amount of soft landscaping on the site minimising the area provided for natural storm water filtration.

In addition to the physical changes to the landscape, the passive and quiet enjoyment of the current space will be severely reduced given the increased use of the space by bowlers and '*members and their guests*' of Mounties which at last count (Mounties Group annual report 2020) was over 144,000 members!

The Plan of Management has minimal details about how the amenity of the area will be managed. The main issues of concerns, and matters for consideration of Council are:

- **Security**

The security plan for the site seems minimal at best. Most people would assume that any licenced venue would require security presence at all times when operational. How will access to the facility be managed when the public can enter from Evans Street? How will Management control numbers and deal with drunk and / or loud patrons when there is no security onsite during operating hours. Sporadic security checks and a noise hotline are not acceptable solutions.

- **Privacy**

The proposed bowling greens are to be located directly in front of a number of units with minimal screening or privacy for these residents. This space is between the front windows of the properties and the ocean and garden views the residents paid top dollar for. Users of the greens will be overlooking private properties and be able to see straight into residents living spaces. Residents in the most affected units will be forced to close blinds and windows while the space is in use for their own privacy. This is completely unacceptable and would never be permitted in a residential area adjoining public land.

The SEE states that '*Consultation with the residents is proposed to assist in alleviating any concerns in relation to privacy. If the residents raise concerns with the privacy or a formal complaint is made, the Club will offer planting, screening, or landscaping to address any concerns that they may have*'. Any consultation (which up to this point has been minimal and misleading) with these residents should have been undertaken prior to the DA being lodged. Screening or plantings in this area will block out the ocean and garden views from the lower units along with obstructing sightlines across

the gardens which currently provide passive surveillance. Natural sunlight will also be impacted. Screens and plants will do little to minimise the disruption 50+ people are likely to cause while using the space.

- **Noise**

The use of a bowling green on the upper ground level terrace has the potential to cause noise impacts on residences particularly given the Watermark Village surrounds the proposed bowling green on three sides in an amphitheatre like manner. Although an acoustic report has been undertaken, the proposal provides limited details on the rules around managing noise. It is unclear whether music will be permitted or whether there will need to be a PA system installed. The issue of barefoot bowls and other noisy events has not been clarified. How will Management deal with loud patrons and events if there is no security onsite?

Lack of detail and clarity in the Plan of Management (PoM)

It is noted in Section 3.2 of the SEE (Pre lodgement discussions) issues around the operation of the proposed bowling green needed to be addressed in the DA – including amenity of existing residents, acoustics, number of patrons, hours of operation etc. My concern is that the detail provided in the PoM lodged with the DA is a minimal attempt to satisfy the concerns of the Northern Beaches Council and has not responded comprehensively to the issues raised. These issues were again raised by the Environmental Health Department of Council once the proposal was internally referred for comment. This PoM is basic, at best, with few details, contradicting other parts of the DA and SEE and leaving a lot of questions about the future operation and management of the bowling green and surrounds unanswered.

One particularly concerning part of the PoM is the statement that the future use of the greens will be '*at the discretion of Club Management*'. The Mounties Club have made no effort to adequately consult with residents about this project, therefore it would be extremely worrying if the Club Management had free reign on the future operation of the space. This needs to be clarified prior to any consideration of the DA. In my opinion it is grounds for refusal.

The PoM outlines the events that are proposed to be undertaken on the greens. The list is long but it remains unclear as to when the space will be made available to residents of Watermark. Without a comprehensive and detailed list including nominated hours of use and number of allocated times per week / year, the use of the bowling greens for non-Watermark residents remains a mystery and should be outlined more clearly.

The number of people that will be permitted to use the space is also unclear. The PoM outlines the conditions of operation during Covid restrictions but is silent about use once the Covid restrictions are lifted. To me, the PoM seems to deliberately mislead residents into thinking there would be a limit of 50 patrons into the future if the proposed DA is approved – this could include anything from private functions, community celebrations (including ANZAC day 2 up arena?) etc. which I am sure residents would strongly oppose if they were made more aware of the clubs future intentions. More information needs to be provided in this regard. How can anyone make a considered submission to a proposal when important details such as number of patrons permitted to use the site at any one time, are missing? Given this significant oversight, the '*discretion of Club Management*' in the future use and operation of the space should not be granted. This needs to be clarified and discussed with residents prior to a decision being made on the proposal.

The potential uses of space is also unclear - what sort of events can the space be used for (18th or 21st Birthdays, Boot camp, barefoot bowls, Anzac Day 2 -up, children's parties, weddings, pop up bars, community or religious events?). The PoM is silent on the use of the space other than bowling events, croquet and picnics, yet the Mounties Club Management wish to retain 'discretion' around other future uses. This is not acceptable. The Club needs to be open, transparent and accountable for the future management and operation of the space.

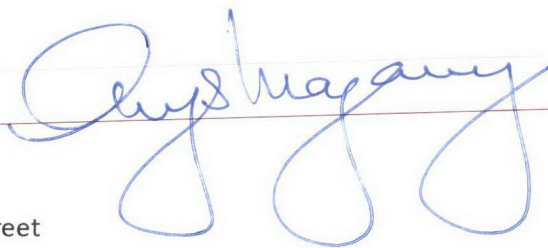
The proposed hours of operation are stated as 8:30-5:30pm whereas the latest bowling game listed finishes at 4pm? The PoM identifies the need for a gate to be erected on the eastern side of the bowling green the gate will close from 6pm to 6am - Why so early and late? The operating hours for use of this space need to be clearly articulated. It is assumed that before and after the bowling games the players are welcome to enter the club for pre or post match food and drinks if desired as there are no facilities for this in the Watermark area. Any future proposal for such food and drink facilities in this area would be strongly opposed.

Details of the proposed amenities planned to be built as part of the DA (a bathroom and locker room?) have not been provided. These are identified to be located within the Watermark building area which is currently not accessible to non-Watermark residents. By allowing access to potentially up to 24 bowlers or 50+ other users at any one time will be a security, safety, hygiene and maintenance issue that is not covered in the Plan of Management. There are no rules about members and guests bringing children or dogs onto the site either. This needs to be clarified.

As outlined above, I strongly object to the proposed development application including the physical and operational changes proposed to the small bowling green currently enjoyed by residents of Watermark retirement village. I trust that Council will make the right decision for the community to refuse the Development Application based on the matters for consideration I have outlined in my submission above. It is important that Council staff attend the site and talk through the concerns of residents before any decision is made on this proposal.

Thank you for the opportunity to voice my concerns.

Yours sincerely



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