

---

**From:** DYPXCPWEB@northernbeaches.nsw.gov.au  
**Sent:** 1/06/2022 3:31:02 PM  
**To:** DA Submission Mailbox  
**Subject:** Online Submission

01/06/2022

MR Robbie ROLANDKENN  
Curban ST  
NSW

**RE: DA2022/0596 - 29 - 37 Dobroyd Road BALGOWLAH HEIGHTS NSW 2093**

Objection against the proposal of DA2022/0596 re 29-37 Dobroyd Road, Balgowlah Heights, NSW 2093

I wish to object to the proposed development on a number of grounds.

1. Zoning. I understand the land is zoned "Neighbourhood Centre". I further understand that such zoned land is intended to be for establishment of centres to serve the needs of people who live or work in the surrounding neighbourhood. The generally acknowledged interpretation of this is that it refers to the needs of people who are currently living or working in the neighbourhood ... not for the creation of a boarding house for up to 20 residents who are not currently living in the area. A neighbourhood centre is meant to serve the needs of people already in the area, not bring more people into the area and not provide any services to them.
2. Zoning. Accommodation is not the type of use intended for a property zoned Neighbourhood Centre: indeed it would in fact suggest that absolutely no residential, boarding house, or other type of habitable accommodation should be permitted within such a zoned site.
3. Proximity to services. The application seems to note on a number of occasions that the site is located "within immediate proximity of a range of services and facilities and a regular bus service" and that the proposal will allow a maximum of 18 residents who can use "...the existing neighbour centre and adjoining café" and also "the frequent bus service". My comments in relation to these statements are:
  - a. In fact there are very limited services within the immediate proximity. Not sure what "neighbour centre" is being referred to. There is no neighbourhood centre nearby at all to my knowledge.
  - b. One lone café next door does not seem to represent a "range of facilities".
  - c. "Frequent bus service" ... only if one can call an hourly bus service frequent.
4. Number of residents. Unclear how many residents will be permitted in the building. Application at times refers to 18 residents, yet the floor plans showing which are double and which are single rooms suggests a maximum of 20 people could live in the building.
5. Needs of co-living residents. Co-living housing is a highly important type of building to have in the Manly area: however, this proposed site seems to have none of the required and important attributes to serve the intended residents of a boarding house. It completely lacks the necessary public connectivity, and is a long walk from any access to a range of services and facilities. Even the small group of shops at corner of Beatrice and New Street are a significant walking distance away, and up a very steep hill (so impractical to reach for anyone how is anything other than fit and full mobile).
6. Parking 1. Lack of appropriate parking: for a building that can have up to 18 (or 20)

residents, a maximum of 6 parking spots (via 3 car stackers) plus one disabled spot is woefully inadequate. Council should insist in a minimum of 1 spot per resident, plus a some additional spots for visitors (perhaps one spot for every 3 units): so suggest 25 car spots which includes one disabled spot. I do understand this may require a large amount of excavation to permit this: but it does not seem to be an unreasonable requirement for putting an 18 (or 20) resident building on 433sqm.

7. Parking 2. To permit only the proposed parking spots will create significant impact on the currently full street car parking of Dobroyd Road. Will also most likely lead to the neighbouring café to loss significant business, as people will simply drive on if they can not park close to the café for their morning coffee.

8. Fire risk 1. The floor plans show that almost all of the units have the kitchen stove and oven immediately beside the only internal access door. As such, any fire on the stove will trap the resident(s) inside the apartment, with their only exit being over the side of the balcony - noting that all the units are on either the 1st or 2nd floors, with no fire escapes.

9. Fire risk 2. The current building has shop fronts that are about 2-3 metres away from the boundary with the neighbouring large apartment/commercial building beside it. The plans show that the proposed building will be built essentially right up to the boundary's edge (or perhaps to within 10cm of it!). This leads to two key factors:

a. A fire in the proposed building will present a significant risk to the neighbouring property, and is likely to spread to the neighbouring property quickly.

b. The neighbouring property has its key fire hydrants (for use by the Fire Service) about 1 metre from current boundary. In the event of a fire in proposed building siting on the boundary it may mean the Fire Service is unable to get to the fire hydrants at all. Leading to an inability to properly contain such a fire, and giving more chance that both buildings will be unable to be protected.

10. Reference to surrounding buildings. The application refers to the rest of Dobroyd Road being one to three storey buildings. Council must understand that there other than the immediately adjoining property (residential with commercial, three storey) there are no other buildings on the street that can be called three storey unless you include the garaging. Anyone seeking to apply to build a 3 storey home on Dobroyd Road, where all 3 storeys are habitable would find their application rejected. The reality is that many of the homes on the Road are single level habitable homes (perhaps with a garage underneath), with the remainder being two-storey habitable homes (again with perhaps a garage underneath if the slope of the land permitted).

11. Habitable area v actual full sqm of building. I note that the application suggests the land area for the property is approx. 433sqm, and that the FSR (whatever that is) is 1:1. This might be completely correct, however, this suggests that FSR does not include the habitable 'common room' (does this means if I build a home I can claim a very large lounge for use by the whole family will be know by us all as 'the common room' and hence I won't need to include it in an FSR calculation), the hallways between units, the front foyer and other common areas, nor the balconies. If all the latter is taken into account, by looking at the plans it looks like the 433sqm of land will have more than 850sqm of building space used by occupants, plus parking on top of this.

12. Lack of soft surface areas 1. I note that substantially all of the land site area seems to be hard areas. As such, what water tank requirements would Council seek to impose on such a property. If I decided to build a home with a building covering about 90% of the land, and the remaining 10% covered by hard surface outdoor paving, what water tank requirements would be imposed on me.

13. Lack of soft surface areas 2. Given the entire building looks like it will cover the entire land site, what rain-water runoff concerns does Council have. In additinoa, given the plans for the car parking, what requirements will Council impose on pump out and other facilities to ensure the car park does not flood: and how will this not add to flooding problems for the street itself.

14. Proposal diminishes local facilities. Current building provides 5 shops that can serve the local area or those who work in it. Removal of 5 shops to provide just one small one seems to reduce (not improve) the land's provision of services to the surrounding neighbourhood. Unclear how the current proposal is permitted in any way for the sites zoning.

15. Building front set-back. A significant number of homes on Dobroyd Road satisfy the Council's generally required front set-back of 6 metres. Any development on this site should do the same. The plans seem to suggest a much smaller set-back which is not in keeping with the surrounding area. (For the 6m rule, refer Manly DCP 4.1.4).

16. Rear set-back. The site is located very much in the middle of a residential area. Any home built nearby is required by Council to have a minimum 8m set-back to rear boundary. I would suggest this site should be treated the same ... or at least require a rear set-back of more than the currently proposed set-back of only 600mm (i.e. only 60cm, or about the length of two pieces of A4 paper laid lengthy-wise). (For the 8m rule, refer Manly DCP 4.1.4).