From: DYPXCPWEB@northernbeaches.nsw.gov.au
Sent: 3/03/2023 2:57:18 PM
To: DA Submission Mailbox
Subject: Online Submission

03/03/2023

MR Kym GRAHAM
205 / 4 - 205 Sylvan AVE
BALGOWLAH NSW 2093
[redacted]

RE: DA2022/2256 - 22 Raglan Street MANLY NSW 2095

My wife and I are the owners of Unit 4, 18 Raglan St which is the property adjacent to the proposed development at 22 Raglan St, Manly.
We fully endorse and agree with the content and detail of the submission of our neighbours in Units 2 & 3 in 18 Raglan St which is attached to this submission.
In particular, we wish to emphasise the following points:
1) Height and Floor Space Ratio (FSR).
Given that the allowable height is exceeded by 33% and the Floor Space Ratio by 136% in our view there is absolutely no justification for such a massive excess.
In particular there will be substantial visual and privacy impacts on the roof garden to Unit 5.
We believe the 2 apartments at the top level should be removed to bring the height and FSR back to reasonable levels. Should this be done, we are in support of the application.
2) Construction.
We have major concerns over the construction phase of the proposal and fully support the comments in our neighbours submission.
The mitigation measures proposed by our neighbours submission are essential in our view.
In particular the issues of noise and dust during construction are of major concern to us as the occupants of the apartment work from home during the day.
Similarly, the issue of dust control is vital and we fully support the proposed mitigation measures contained in our attached neighbours submission.
3) Community Engagement
We also wish to emphasise the importance of establishing communication channels with the proponent at the initial stage of the project in order to set up a program of regular consultation as the project proceeds.

The following is a copy of the submission made by our neighbours in Units 2 & 3 as referred to in our comments above :
I own 2/18 Raglan Street which adjoins the proposed development at 22 Raglan Street (DA2022/2256; Lot 100 DP 1009880).
DESIGN
The building design is aesthetically good however I have two concerns:
1. Height. The building exceeds the allowable height by 33% (14.66 metres versus 11 metres). This is not in keeping with the adjoining unit block at 18 Raglan Street. It will also have privacy impacts on the rooftop garden at 5/18 Raglan Street and will have a negative visual impact on residents in 23-31 Whistler Street.
2. Floor space ration (FSR). The building exceeds the allowable FSR by 136% (1.77:1 versus 0.75:1). FSR exists to stop overdevelopment and there is no justification for

exceeding the prescribed limit by more than 2.3 times.
Based on these concerns, the top level - consisting of two apartments - should be removed. If the top level is removed, we are supportive of the development.
CONSTRUCTION
There is minimal information in the Statement of Environmental Effects (SEE) or other documents (Noise Impact Assessment; Geotechnical Assessment) about the environmental impacts of construction and how these will be mitigated.
I request that the proponent re-submits the SEE with information about project duration, construction methodology and impacts, and mitigation measures.
I understand that detailed design will not take place until the construction phase of the project, however the proponent should be able to provide high level information about construction methodology as this would have informed the estimated project cost of $8,470,000.
Based on the limited information available in the current documents, and in the event that the SEE is not revised, I have surmised the key environmental impacts for nearby residents and businesses. I have also proposed some mitigation measures for Council to consider including as conditions of development consent.
1. Vibration
As noted in the Geotechnical Assessment, there is potential for transmission of vibrations from demolition works to impact on neighbouring structures.
To mitigate this risk, all recommendations included in the Geotechnical Assessment must be complied with, in particular:

The proponent must undertake comprehensive dilapidation surveys of all adjoining buildings including all individual apartments and common areas. The owners of the adjoining properties must be asked to confirm that the reports represent a fair record of actual conditions.

The proponent must ensure the existing site building footings and floor slabs are saw cut or otherwise broken into smaller manageable pieces rather than demolished by use of rock breakers.

The proponent must undertake vibration monitoring on the neighbouring buildings targeting ‘as low as reasonably practical’ vibrations, and not greater than 3mm/s peak particle velocity (PPV).

2. Noise
Noise is a key concern, as the project will be undertaken in a high density residential and commercial area which includes a primary school and also a church which hosts funerals and weddings on weekdays and weekends.
Suggested mitigation measures:

The proponent must complete an assessment which documents the level, timing and duration of noisy activities during demolition and construction, along with noise mitigation measures including appropriate respite periods for high level noise. The assessment must include a review of plant selection, construction approaches and scheduling to reduce impacts. The assessment must be shared with the affected community before the start of demolition.

Normal construction hours should apply (ie. 7am to 5pm on Monday to Friday and 8am to 1pm on Saturday). However, high level noise such as drilling should not take place before 9am on weekdays and should be avoided on Saturdays. No work should be undertaken on Sundays or Public Holidays.

If night work is unavoidable, hours of work should be limited to no later than 10pm.

Neighbouring residents and businesses must be given at least 7 days notice of work that will generate high level noise or vibration, and also any out-of-hours work.

Neighbouring residents and businesses must be provided with a contact number for the Site Manager which is staffed for the duration of any out-of-hours work.

3. Traffic
Given the site location, managing traffic flows and parking during construction will be challenging. In particular, any requirements for work to be undertaken at night time to minimise traffic impacts must be balanced against the impact on sleep disturbance.
Suggested mitigation measure:

When developing the Construction Traffic Management Plan, the proponent should seek a solution which maintains adequate traffic and pedestrian flows while avoiding out-of hours work.

4. Dust
Due to the close proximity of neighbouring residents, dust needs to be carefully managed.
Suggested mitigation measures:

Water sprays must be used to reduce airborne dust from demolition work.

Dust-generating work must be avoided on high wind days.

5. Community engagement
The Northern Beaches Community Participation Plan encourages proponents to engage with the local community prior to lodging an application.
Suggested actions:

To assist in developing the Construction Environmental Management Plan (or similar documentation as required by Council), the proponent should arrange an initial meeting with neighbours to discuss project timing, the environmental impacts of the work over the life of the project and feasible mitigation measures. This engagement opportunity should be extended to all affected residents and businesses.

The proponent should engage with neighbours to establish communication channels such as a WhatsApp or SMS group to provide updates within agreed timeframes on:

upcoming work which will generate high noise, dust or vibration, including the duration of that work and any respite periods.

any out-of-hours work if unavoidable, including likely noise levels and if there is potential sleep disturbance.

I understand that impacts are unavoidable when constructing a large apartment complex within a high density residential and commercial area. I encourage the proponent to work proactively with neighbours on practical options to mitigate impacts, and to quickly resolve any issues which arise. By working together, the project can run more smoothly