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Sent: 3/03/2023 2:58:48 PM
To: DA Submission Mailbox
Subject: Online Submission

03/03/2023

MRS Linda Halligan
5 / 18 Raglan ST
Manly NSW

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

I am the owner of unit 5/18 Raglan Street which adjoins the proposed development at 22 Raglan Street (DA2022/2256; Lot 100 DP 1009880).

I fully endorse submissions from our neighbours in Units 4, 3 and 2 and totally agree with their submissions.

I would like to submit the following on behalf of my husband and I and would like our objections to be heard. Our unit has a roof top terrace as our only outside space. This roof top terrace will now be severely impacted and extremely compromised by the third story of this development. Many months ago the owner of the development approached myself in relation to his proposed development. He mentioned then the building would only be 1-1.5 m above our roof top terrace. At the time I thought this was totally acceptable and would have minimal impact on our outside space and was supportive.

Recently having access to the new plans we were dismayed to see a whole new third level or storey on this proposed development. We believe it was the intention for this development to have 2nd level loft apartments in the roof line which would have meant the roofline would have been much lower and less impactful on our roof top. I would like to ask why a third level has now been encouraged when the below applies.

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 and surrounding buildings. 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.

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.

3. Much of this third level is a communal roof top terrace which will be used by the apartment holders in this new development. These apartments will already have their own private outdoor spaces and it seems unacceptable that a 2nd space for each of these units is a communal roof top terrace which will severely impact and compromise our only outdoor space by taking away our outlook, taking away all our late afternoon sun on our roof top and providing a large wall to effectively close out our total western outlook and of which will seem very claustrophobic to us in our private space. It seems totally unacceptable from a noise aspect, as a communal roof top will add to the noise of this community. For years we have consistently been exposed to constant noise from the backpackers in their outside terrace of this complex, with numerous complaints to the police and with music beats vibrating into our apartments. Obviously this has stopped over the last couple of years due to the pandemic and the backpackers closing up during this time. However a large roof top terrace will effectively continue this practice and is totally unacceptable to all the residents in the vicinity of this complex. We ask that this

communal roof top be removed.

4. The shading we will receive from this development on our outdoor space is totally unacceptable. We spend most evenings and dinners on this rooftop as our apartment is very small. To lose our winter sun over much of the roof top is very unfair and unacceptable to give the development apartment owners an additional communal roof top when they already have outdoor spaces at the expense of our outdoor space.

Based on all of these concerns, we insist the top level - consisting of two apartments - should be removed or altered to include a type of 2nd level loft-style apartments instead. If the top level is removed, we are supportive of the development, or as last resort perhaps a new design where the rooftop communal terrace and garden is excluded and the third level is set back considerably i.e. moved northwards allowing western outlook and sun back over our terrace also the negating the additional noise from the communal rooftop.

CONSTRUCTION

We totally support the following comments by our neighbours within our complex. The control and mitigation measures listed below are essential in our opinion. I have listed their comments below:

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.

We request that the proponent re-submits the SEE with information about project duration, construction methodology and impacts, and mitigation measures.

We 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.

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).

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.

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.

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.

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.

In summary we will only support this application with the removal of the third level to bring it into line with all the other developments and heritage buildings and zoning of this area.