
Sent: 1/03/2023 5:06:48 PM
Subject: Submission- DA2022/2256 22 Raglan St Manly
Attachments: St Mary's Catholic School Manly- NB Council Letter - Backpackers
Development - Submission.docx;

Dear Mr Tony Collier,

Please find attached submission regarding proposed development at Lot 100 DP 1009880 22 Raglan St, Manly.
DA 2022/2256

If you require any further information, I am available upon request.

Kind regards,

Paul McGuire
Principal
St Mary's Catholic Primary School
Manly
9977 2225

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28 February 2023

Mr Tony Collier
Principal Planner
Northern Beaches Council
725 Pittwater Road
Dee Why NSW 2099

Dear Tony,

DA2022/2256 – 22 Raglan Street, Manly - Demolition works and construction of a mixed use development with basement car parking
Catholic Schools, Broken Bay is the registered proprietor of 1 Denison Street, Manly, also known as St Mary's Catholic School (St Mary's School) which accommodates 306 students between the ages of 5 and 12.. The school is immediately adjacent the subject site of DA2022/2256.

On behalf of Catholic Schools, I wish to make a submission on DA2022/2256 for demolition works and construction of a mixed use development with basement car parking. We thank Northern Beaches Council for the opportunity to comment on this proposal.

The background to this submission and the key issues and concerns in regard to DA2022/2256 are outlined below. It should be noted St Mary's School supports the provision of NDIS Specialist Disability Accommodation and is taking this opportunity to comment on matters that are expected to cause issues to the School's day-to-day operations which were not considered to be addressed in the lodged documentation.

Catholic Schools landholding

A site aerial showing the proximity of St Mary's School and the proposed development is provided below.



Figure 1 – Aerial Map

Built form and scale

It is noted the proposal seeks for two Clause 4.6 variations seeking for a 33.3% height variation to the 11m height control and 135% floor space ratio (FSR) variation to the 0.75:1. These are considerable variations for a relatively low-scale streetscape and allows for a development that is dense for the site. It is noted the additional level which is subject to the variations is setback from the site but is still a noticeable addition to the built form which is not in keeping with the built form that lines Raglan Street.

Critically this additional development yield will result in increased traffic generation at the site which is our main concern with the DA.

Traffic and pedestrian connectivity

We are concerned that the construction of the proposed development will put considerable strain on the local road network both during construction and operation.

The Traffic and Parking Assessment Report that accompanies the DA states – “*projected traffic activity as a consequence of the development proposal is minimal, and will clearly not have any unacceptable traffic implications in terms of road network capacity*”. It is considered unreasonable to assume the traffic consequence is “minimal” when the proposal is seeking for a 135% variation in floor space and 33.3% height variation, resulting in a more dense proposal that is accommodating 10 apartments comprising a mixture of typologies, and a very different operation to the previous use as backpacker’s accommodation which would have had minimal vehicular movement.

Significant construction and excavation is required to allow for a basement providing 14 car parking spaces, storage, electricity plant room, bulk goods storage, bicycle parking, stair and lift access. The construction is considered to put considerable strain on the day-to-day flow of Raglan Street as a result of potential road blockages especially given Raglan Street comprises of a single lane of traffic. A particular concern for the St Mary’s community is the impact of the proposal on school drop off (8am-9am) and pick up (2.30pm-3.30pm) periods. There is concern that the traffic generated by construction and delivery vehicles will hinder the day-to-day flow of drop off and pick up operations as parents queue along Whistler Street and Denison Street to pick up and drop off students. We note Whistler Street is the main ‘kiss and ride’ drop off and pick up location for the school.

In addition, it should be noted that the Manly Oval located nearby to the subject site (shown in Figure 1) is used as an additional play space for students which St Mary’s School hires from Northern Beaches Council. Students travel from St Mary’s School down Whistler Street and onto Raglan passing the proposal site to get to Manly Oval. Pedestrian safety is a key concern for the school both during operational and construction periods of the development.

We request a Construction Management Plan be prepared and exhibited for comment prior to any determination.

Conclusion

The proposed development is considered to have considerable impact on the day-to-day movement of staff, students and parents of St Mary’s Catholic School and we therefore request adequate consultation is undertaken to ensure the school community is well accommodated during the construction of the proposed development.

In Clause 4.6 variations, there must be sufficient environmental planning grounds to justify contravening the development standard and it is therefore recommended that further justification is provided regarding the operational and construction traffic impacts on the surrounding road network.

Further, it is noted the Traffic and Parking Assessment Report has no regard to construction management measures. It is requested the applicant provides for a construction management plan that ensures the safe operation of the footpath on Raglan Street, to ensure students can safely walk to the oval from St Mary’s School.

Thank you again for the opportunity to provide feedback on the DA. Please do not hesitate to contact the below for clarification on any matters raised in this submission. The relevant contact details are: Paul McGuire (School Principal- 9977 2225)

Yours sincerely,



Paul McGuire
Principal
St Mary’s Catholic Primary School
Manly