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26/06/2022

MR John Worrell
3 Lakeside CRES
North Manly NSW 2100

RE: DA2021/1912 - 2 - 4 Lakeside Crescent NORTH MANLY NSW 2100

I strongly object to the application DA 2021/1912 - Alterations & additions to the existing building

First and foremost I believe that DA 2021/1912 - Alterations & additions to the existing building needs to be evaluated in conjunction with DA 2021 /1914 - Subdivision as effectively they are all part of the redevelopment of the existing site and building.

The revised application does not address the core issues of the entire site as previously outlined and listed below.

Further, recent floods have shown that the existing building would be inundated and runs a high chance of putting lives at risk. These flood waters were too strong to walk through let alone negotiate if you were elderly and in a wheel chair. There are constant references in the revised DA 2021/1912 to residents undertaking their own visual monitoring of flood levels. As a resident who went through the recent flood I am fully aware how quickly the flood waters rose and how dangerous they became. To imply that there will be flood wardens on hand 24 hours a day, 7 days a week, 365 days a year to carry up to 24 residents on the ground floor up to the first floor is farcical.

I strongly oppose the mixed usage of the site proposed in DA 2021/1912

I can't see how the site can have a boarding house on the ground floor and then seniors housing on the 2 floors above this. The entire building will be accessible by anyone on any floor. Does that mean vulnerable older woman will be sharing the building with anyone applying for boarding house accommodation? There would seem to be a number of safety issues with such a situation.

Currently the entire site is zoned R2 low density residential.

The owner (Landcom) is proposing a use that is not classified as suitable for R2 low density residential. It is also proposing a development that is completely different to the continuation of the site as it was previously used (a health centre). Any alterations or additions to the existing building needs to be put into the context of the use and approval of the site as it was originally was.

Any subdivision substantially reduces the site area, eliminates the majority of off-street car parking spaces and the majority of the vehicular access driveways, fundamentally changes the vehicular circulation patterns on the site and surrounds, includes significant vegetation removal, and materially changes the spatial setting of the existing building.

Under the Warringah Local Environment Plan 2011, R2 Low Density Residential means that

seniors housing is prohibited in this zone. The application claims that State Environmental Planning Policy overrides the LEP. This is not so. In August, Rob Stokes proposed in the Environment Planning and assessment Act that this loophole be closed so that seniors housing will no longer be permitted in R2 zones across the Northern Beaches and that any seniors housing development not already approved may not proceed.

Our mayor, Michael Regan has already noted his concern about this, saying council will apply to get an exemption from state planning rules "so we don't have to continue to consider proposals that are not in keeping with the character of our neighbourhoods."

I strongly object to the proposal in the revised DA2021/1912 as there are still a number of issues that are not addressed relating to

Building Height

Density and scale

Landscape area

Waste management

Wall Heights

Parking

Neighbourhood amenity and streetscape

It creates a density and scale of development that is not in keeping with the neighbourhood and amenity of the area.

There is a clearly defined neighbourhood bounded by Pittwater Rd, Manly Creek and Nolan Reserve. This neighbourhood is entirely comprised of detached dwelling houses in accordance to the R2 zoning.

The development in DA2021/1912 is not in keeping with a low density residential environment which is zoned R2.

There are 37 dwellings proposed in DA2021/1912 development which is a significant addition to this local community. The neighbourhood has made numerous requests to provide more outdoor space and car parking for this development but they have been ignored. To provide a total of 8 car spaces is simply not adequate. Currently there is no street parking available either on Pittwater Road nor on the side road of Lakeside Crescent. Existing demand for parking further along Lakeside Crescent and Palm Avenue is at a premium due to existing businesses, residential needs and from commuters.

Much is made in the landscaping and outdoor area designs of DA2021/1912 and the pleasant community areas that are to be developed, but these bear no resemblance to what is achievable in the small spaces that will be available. The area available is not large enough for the proposed washing lines, barbeque and seating areas promised.

Any subdivision will destroy trees and the biodiversity of the site

Clause 4.1 of the LEP specific a minimum lot size of 450m², and the proposed development numerically complies with that minimum requirement.

The proposed development includes the removal of 38 trees from the site, of which only one (1) is an exempt species (Tree 52). The majority of the proposed tree removal occurs over the northern portion of the site, and is directly attributable to the proposed lot sizes, and the requirement to accommodate a useable building footprint on the individual allotments.

In that regard, the lot size control is a minimum requirement, and there is no automatic entitlement to achieve allotments of the size proposed.

In this instance, the existing trees on the site collectively form an important landscaped feature of the locality. The trees effectively form a visual buffer to the significant activity on Pittwater Road, and the industrial land uses on the opposite side of the road carriageway.

Further, the vegetation is highly visible from Pittwater Road, and from Oliver Street when approaching Pittwater Road from the north-east. The significant extent of tree removal on the

site would be materially reduced if the proposed development provided larger (or fewer) lots. Finally, Clause 5.10 of the LEP requires the consent authority to consider the impacts of the proposed development on any heritage items, heritage conservation areas, or heritage items in the vicinity of the site.

The heritage items in the vicinity of the site include portions of the carriageway of Riverview Parade. The Statement of Significance (environment.nsw.gov.au) for the item includes: Street planting of Canary Island Palms (*Phoenix canariensis*), 15 in total, including one in Lakeside Crescent. Also one mature Cabbage tree palm (*Livistona australis*) in street - remnant planting of original association.

Planted as an integral part of the landscape scheme for the subdivision. Likely to have been planted in the early 1930's.

The Arboricultural Impact Assessment prepared to accompany the DA notes that there are five (5) mature Canary Island Palms on the site, and that "They are all mature". The proposed development includes the removal of three (3) of the existing Canary Island Palms.

Waste Management

Again, due to the lack of suitable street access, the positioning of any bins creates a increased risk of accidents for vehicles, cyclists, pedestrians and particularly the waste management collection vehicles.

Conclusion

I totally object to any subdivision of the site proposed in DA 2021/1912 - Alterations & additions to the existing building based on the above points. The revisions and changes made to the existing DA do not adequately address the issues raised above. As has been pointed out to the current owner a number of times, this community is not against utilising the site constructively, but it has to be in keeping with the amenity of the neighbourhood and the state and local planning requirements.