
Sent: 25/09/2020 12:14:19 AM
Subject: Online Submission

24/09/2020

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RE: DA2019/1475 - 22 Victoria Parade MANLY NSW 2095

This is a submission regarding the amendment to Development Proposal DA 2019/1475 for 22 Victoria Parade Manly. I am the owner of Apartment 4 in the adjacent property at 28 Victoria Parade and after having reviewed the amended proposal, still have concerns regarding the unnecessary negative impact of the proposal on neighbouring apartments.

My primary concerns with regard to the amended application are:

1. Continued non-compliance with Council requirements for Floor Space Ratio
2. Continued non-compliance with Council requirements for maximum building height and associated loss of views to neighbouring apartments
3. Insufficient information provided in the Landscape Plan
4. Out-of-date and insufficient information provided in the Acoustic Assessment.
5. Parking and traffic concerns not addressed in amendment

Floor Space Ratio

While the Floor Space Ratio (FSR) of the amended design has been reduced, it still is 2 x the council requirement for any developments within the area. Again, I note that other construction proposals in the street were initially rejected with concerns about FSR, notably DA 367/2010.

Excessive height and loss of views

I note that the proposal has tried to accommodate the loss of views to apartments at 18-20 Victoria Parade, however the proposal still exceeds the permissible 11 metres allowed and causes a detrimental loss of views to apartments at 28 Victoria Parade. Again, referencing NSWLEC 140,

"A development that complies with all planning controls would be considered more reasonable than one that breaches them. Where an impact on views arises as a result of non-compliance with one or more planning controls, even a moderate impact may be considered unreasonable."

the impact to the views to these apartments, however "not worthy of retention" the proposer considered them, would be considered unreasonable and should also be factored in when refusing the amended proposal. I note that other proposals on the street have also been rejected due to excessive height being a contributing factor.

Landscape plan

There is a concern regarding the lack of information about the boundary line between 22 and 28 Victoria Parade. With 10 bicycle spaces located against the boundary line, it needs to be ensured that guests of the hotel do not congregate in the driveway of 28 Victoria Parade while preparing their bicycles nor utilise the driveway to wheel their bicycles in/out of the property.

As previously mentioned, there is already a constant problem with patrons and staff of both the hotel and Hakan's Café parking in the driveway of number 28 while utilising either service. A clear distinction needs to be made between the hotel driveway entrance and the private driveway entrance of number 28 as part of any future amendments.

The Landscape plans explain that, "The rear space has a communal garden which is intended for passive activities." While an intention is nice, there needs to be more concrete information regarding how the area will be restricted to passive activities, what passive activities consist of and for what hours of the day this will be restricted to patrons.

Acoustic survey

The submitted acoustic survey is over 5 years old and doesn't take into account the current café (as it didn't exist at the time). With evidence of noise complaints already submitted to the Northern Beaches Council from the existing café, and with the increased footprint proposed, this will be further exacerbated by an increase in patrons.

The amended proposal also provides for a cascading water feature along the boundary line of the 18-20 Victoria Parade. No information regarding the acoustic impact of a proposed water feature and the associated machinery driving it have been included in the survey.

Parking and traffic management

As mentioned in a previous objection, there is already a concern with regard to double-parking or cars blocking the driveway of 28 Victoria Parade. With a design that exceeds the required Floor Space Ratio by 2x, an increase in patrons is only going to exacerbate this issue. Additionally, a single 3.6M wide entrance is not consistent with other proposals that have approved on Victoria Parade and is going to increase traffic issues on the street as patrons, service vehicles and staff wait for opposing vehicles while entering or exiting the parking area.

Based on the concerns above, along with concerns in other submissions to the council, I ask that the amended proposal be rejected. I am not opposed to redevelopment of the building and feel that the approved DA 167/2015 provides a sufficient balance between negative impact on the neighbouring apartments and the need for the hotel owner(s) to maximise their investment.

Regards,

Nick Arneaud