
Sent: 1/08/2019 12:38:36 PM
Subject: DA2019/0683 - Submission
Attachments: Written Objection to DA2019_0683.docx;

To whom it may concern

Please find attached my submission opposing the DA2019/063 at 29-35 Reddall and 95 Bower Streets, Manly.

As my submission has photos I could not up-load via the portal. Appreciate your assistance to add my objection to the other online submissions.

Thank you very much

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1 August 2019

To whom it may concern,

Development Application No: DA2019/0683

I am writing to object to the proposed development at 29-35 REDDALL ST & 95 BOWER ST, MANLY.

We have viewed the application for the proposed development and believe that they do not accord with the objectives of the Development Control Plan for this residential sub-zone. In the areas of:

- Setbacks and streetscape
- Unclear DA perspective images, material palette and shadow diagrams
- Incorrect density diagrams and zoning
- Landscaping
- Impact of excavation, noise, machinery
- Impact on amenities services such as sewage, drainage
- Parking and increased traffic
- Privacy to neighboring buildings
- Removal of existing vegetation, now home to native animals
- Density and Height of the proposed development does not comply.

These listed non-compliances will have an adverse impact on Bower and Reddall St, as well as the wider Manly community. Our detailed objections are set out below:

1.Setbacks and streetscape

The average setbacks disclosed by Squillace of properties on Bower St are 2.65m at the front of the buildings, and 2.4m at the rear. However, when considering the bulk of the new proposed development, these figures are not sufficient.

On the Reddall street side, the primary structures of two storeys are set back, and buildings close to the street are either 1 storey flat garages or gardens.

In City Plan's DA report on page 13, the 1 storey garages and gardens along the Reddall street pathway are visually laid out, and yet the authors state that this new two storey building just 2.4m from the pathway will blend in with this current streetscape:

"the buildings bulk and scale respond sympathetically."

They also quote that buildings along Reddall Street have a similar character as the new designed property, stating buildings from, "single storey to 8 storeys in height," have a similar bulk and scale. This generalisation cannot be used to determine the suitability of the new dwelling. The 8-storey building in question on the corner of 138 Addison and Reddall Streets

has a 35m setback from the front of the building to the walkway on Reddall Street and responds sympathetically in accordance to its bulk and scale. In considering setbacks like these on the street, the Squillace addition should have at least a 4.375m setback on Reddall Street when comparing the structure to buildings such as 138 Addison and Reddall.

2. Unclear DA perspective images, material palette and shadow diagrams

The distorted perspective images on page three of the current DA are both misleading and fail to correctly demonstrate visual appearance and material palette. My concern is raised in particular to the laneway separating 97 Bower St, with the perspective images creating the illusion of a widened laneway to accommodate the increased flow of traffic. The 3D images are misleading, particularly the 3D view looking south, the view from Bower St Corner Reserve looking South West, and the 3D view from Reddall St Corner College St looking North. They show what appears to be a widening of both public pathways, and more privacy from the public laneway, however both images are warped and unsuitable demonstrations of how the space will appear. They should not be considered accurate, and not used to determine the eligibility of the proposal.

The shadow diagrams are another reason to raise concern. Showing only the Winter Solstice, the diagrams fail to show any surrounding context, structures or neighboring buildings. New renders should be produced to show both the Summer Solstice (22nd December), and the Equinox (23rd September/21st March) and how the bulk of the structure will affect both neighboring properties and public laneways and spaces.

The material palette is also generalized and unclear to why such a wide variety of materials are used. The darker masonry used at the rear and sides of the property, in comparison to a lighter front façade seems unjust and unclear at this stage.

3. Incorrect density diagrams and zoning

As demonstrated in these diagrams, Bower St is primarily classified as a General Residential Zone. Squillace Architects have failed to use correct terminology, comparing the new structure to the waterfront buildings on the low side of Bower Street, and not to the structures on the same side as the development proposal. To fall under the banner of higher density residential on the higher side of Bower Street is a misrepresentation, with most of the street comprised of smaller residential semi's, renters and share housing, as well as private dwellings. As seen below:

Squillace's current drawing attached to DA:



Manly LEP Classification of Residential Zoning:



4. Landscaping



I am also concerned about the current landscaping plan for the Squillace designed development. Mr. Squillace's previous landscaping examples in the area have been disappointing and lack many of the native species promised in the design phase. The building at 110 Bower St which he designed includes small shrubs and weltering bamboo, with no inclusion of natives of suitable planting for the Manly environment (natives were shown in the DA but were never incorporated into the final design).

5. Impact of excavation, noise, machinery

With such a huge development, I ask that a suitable plan be developed to prevent the impact of excavation, noise and the placement of machinery along the narrow streets of Bower and Reddall. The scale of the current proposed building would impact and disturb residents and visitors to the area for a lengthy period. In the instance of rain, the chemicals and run-off of debris would travel straight down Bower Lane and into the Fairy Bower Reserve. There is no inclusion of how this huge development would impact the environment, and what strategies would be incorporated to protect the marine reserve.

6. Impact on amenities services such as sewage, drainage

The level of density in the proposed dwellings would add huge pressure onto our existing sewage system. The Manly amenity services such as the sewage system and drainage will have to be inspected, to ensure they are able to withstand the density of this block.

7. Parking and increased traffic

The initial parking plan for the proposed development, as listed in the Varga Traffic Planning report, includes 9 off-street car parking spaces for the terrace houses and 44 off-street car parking spaces. This is a highly optimistic figure for scale of this development. As taken from page 20 of the report, 7 car spaces have been assigned for the 4 terrace houses, each one containing 3 bedrooms. This is a totally inaccurate number for a three-bedroom dwelling, leaving a mere 1.75 spaces per terrace. A three-bedroom house has the possibility of 2-3 cars (1 per mother and father, and possibly 1 for older offspring).

I believe that the new development will add additional pressure to a parking area already at max capacity and not serving the requirements of visitors. Although it meets Council Requirements, Manly receives over 1.1 million yearly visitors (NSW Government Manly Visitor Profile, 2018). Varga Traffic Planning have overlooked this aspect of parking in Manly, stating that Bower, Reddall and College St are used primarily,

“to provide vehicular and pedestrian access to frontage properties.” (page 13 of the Varga Traffic Assessment)

This shows an inadequate understanding of Manly, and the significance of the Bower area as a parking area for visitors to swim, surf, snorkel, dive, attend nipper events and festivals, or visit Shelly or Main Beach and the many restaurants in the area.

The impact of a driveway directly opposite Bower Lane should also be explored further, as this is a very busy pedestrian access point to the Fairy Bower during the year.

VARGA TRAFFIC PLANNING PTY LTD

	Terrace Houses (×4)	Residential Apartments (×19)
Residential:	6 spaces	26 spaces
Visitors:	1 space	5 spaces
TOTAL:	7 spaces	31 spaces

8. Privacy to neighbouring buildings

In particular, the privacy of 97 Bower St has been completely ignored in the report and removed from all drawings, shadow diagrams and privacy reports. The proposed building C on Reddall St will look directly into the pool of 97 Bower, eliminating the usability of this roof top space.

Judging by the photos provided by Squillace of resident's views in upper Reddall St at 28, 30 and 32, the ocean vista is now compromised by the large massing of the building, replacing the existing trees. By suggesting that the cutting down of the trees will improve residents' views, is in complete disregard that the natural Bower environment serves as a much more pleasant view than dark bricks and concrete. For example, the images of 30 Reddall St on level 1, replace a palm tree with a harsh metal panel. This compromise simply doesn't equate to equal exchange of views.



I am also highly concerned that the only clear residents in the surrounding area that are gaining slightly more view of the ocean from the development are residents at 7 College Street. As many in the local area know, the land on which these apartments sit is also owned by the Catholic Church, as is the land of this development. With the leases on the 7 College St apartments coming up in the next few years, it seems ironic that the clearing of the vegetation and trees that so many enjoy on the corner of Reddall and College is being removed for the benefit of only Church land. It seems unfair that only the owner of the land will benefit, and that prices will increase quite possibly for residents in the 7 College St apartments in the near future (to this they should become aware). In particular, apartments 10, 7, 6, and 3 are almost doubling their views through the removal of vegetation. We see this as an unfair compromise, considering properties directly behind the new development are losing

much of their views. This should not be considered as ethical 'view sharing.' As seen below in the following images:



9. Removal of existing vegetation, now home to native animals

According to Council Research as taken from the 2013 Manly LEP, and the Environmental Impact Assessment Guidelines taken by NSW National Parks and Wildlife Service on the Endangered Long-nosed Bandicoot Population, the property falls under as a significant area for endangered Bandicoots. The scale of the vegetation in the area serves as an extension of the bushland from Montpelier Place and North Head. As laid out in the report made by the NSW National Parks and Wildlife Service, protecting these creatures occurs through:

1. Avoid direct impacts and retain habitat;
2. Minimise impacts where ever possible;
3. Mitigate or ameliorate impacts; and as a last resort
4. Compensate or offset for any unavoidable impacts.

The design does not appear to support the protection of this endangered species, and as laid out in the guidelines, should provide bandicoot spaces under fences to allow movement of bandicoot's between properties, and preserve the existing vegetation.

We would ask that an independent arborist and native animal specialist for the bandicoots explore the area further. The removal of 46 trees and an endangered native animals' habitat should be explored further. The harsh and foreboding scale of the design will remove the natural appeal of the Bower Reserve and surrounding residential environment.

10. DCP Compliance and Height Breach

The proposed development does not comply in several key areas of Councils Residential DCP including:

Control	DCP/LCP Requirement	Proposal	Compliance
Density	1unit/250m2	1unit/135.85m2	NO
Height	8.5m roof height	9.3m with roof	NO

These non-compliances generate a raft of concerns for current and future residents within this zoning and highlight the excesses of this proposal. The density control under the Manly DCP is 1 dwelling per 250 sq mt of site area, therefore for this site there should be no more than 12 dwellings, not the proposed 23 dwellings. These maximum 12 suitable dwellings would also need proper setbacks and gardens, so the number of dwellings on the site would be even less than the maximum of 12. The floor space ratio (FSR) is also some 65% over the Manly LEP development standards, and at this scale will damage not only the environment but also the beauty of the Manly Bower area.

The site has a maximum building height standard of 8.5 metres as specified under Clause 4.3 of the Manly LEP.

With the maximum breach of the height plane, "situated at the lowest part of the site, on Building A," as stated on page 3 of the City Plan Clause 4.6 Variation Request, the breach will be noticeable at the front and back of the property. Allowing this breach to take place will allow similar bulky developments in the area to take place in the future and should not be allowed to take place. Also, the huge addition of basement car parks is also causing this height breach. By reducing the properties to the correct DCP requirements of dwellings, this height breach will be easily preventable.

There are no precedents for this scale of development in the area. The suggestion of 23 apartments for the site is in complete disregard of LEP and DCP regulations. The current DA submission has disingenuous intentions for the local area.

For Example, 101 Bower St has three dwellings, with 250sq m per apartment (approx. 750sq m site), and 92 Bower has three dwellings, with over 250sq m per apartment (approx. 777sq m site).

Overall, I believe that the current development is a total abuse of the power the Catholic Church has over land in the area and fails to meet any specified guidelines in the area. We ask that the DA drawings be resubmitted with a design that meets height and density regulations, has sufficient setbacks from the pathways, and includes sufficient green space that other properties in the area provide.

Yours Sincerely,
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