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Subject: Online Submission

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RE: DA2019/0683 - 35 Reddall Street MANLY NSW 2095

To whom it may concern,

We would firstly like to request an extension to the submission date as we are awaiting an Independent View Impact Study to be completed regarding our home, 27A Reddall Street/97 Bower Street, Manly. Squillace Architects has agreed that this is necessary and we are currently awaiting confirmation from Squillace Architects regarding the timing of the inspection and ensuing report. Without this information we cannot make a fully informed submission and thus require and would appreciate an extension.

Pending the Independent View Impact Study, please consider this document as a preliminary submission.

We are writing to object to the proposed development at 29-35 REDDALL ST & 95 BOWER ST, MANLY. Upon our viewing of the proposed development plans and reports, several concerns have been raised. Please consider the below concerns as the basis of our objection to the development.

1. EXTENSIVE LOSS OF PRIVACY

We have significant concerns as to the effect that this development will have on our privacy in several areas of our home. Being the direct neighbours of the property, we are deeply concerned and disappointed that this has been given no consideration in the available plans or reports.

In our viewing of the plans, it is clear that the development, particularly the plans for Lot 84 and the overall height of the entire development, will result in an extensive loss of privacy in our garden, kitchen, living, dining, balcony and rooftop space. Our privacy was given no consideration, specifically in the City Plan Statement of Environmental Effects Report (S 6.3.5) or in the Squillace Architects submissions. This is an area that clearly needed to be assessed and at the very least mentioned. The absence of any reference to our property displays a lack of effective preparation and planning.

We share a common wall with 99 Bower Street and as such, the vast majority of our windows are situated on the Southern side overlooking the reserve, the views of the neighbourhood and St Patrick's College.

Our main concern is that occupants would clearly be able to look directly into our most used spaces, being living, dining and kitchen areas. Expansive windows run along the vast majority of our southern wall on our living space level. The only solution for us would be to close our

blinds, which would sacrifice the primary source of light for the entire home. This is unreasonable and impractical. The plans for building C also shows that it will look directly down into our pool and rooftop space. This will eliminate the usability of this space extensively for us.

An additional concern is that the eastern developments will also allow for direct views into our master bedroom. We are also concerned that due to the height of the plans for Lot 84, that the occupants will be able to see clearly down into the sky lights installed in our ground floor bedrooms. This would be a serious invasion of privacy. However, it is hard to tell just from the plans whether this would occur, and would appreciate some wooden height templates to be installed so that we could ascertain whether this will be an issue.

Wooden height templates would also be of great assistance more generally for the wider neighbourhoods assessment of view loss/privacy concerns and we would like to please request the installment of these.

2. EXTENSIVE LOSS OF VIEWS

Similarly to the above issue of privacy, our loss of views has been given no consideration in the Squillace Architects plans or City Plan Report.

As is outlined above, we share a common wall with 99 Bower Street and our home relies unquestionably on our views from our Southern wall of the neighbourhood, the greenery, and importantly, St Patrick's College. Our level 3 living space and rooftop spaces were both designed to frame this view, which would be significantly reduced if the development was to be built using the current plans.

Whilst our ocean views will not be impaired, the City Plan Report (S 6.3.7) clearly states that iconic views are important in the assessment of view sharing. Our views of St Patricks should certainly be deemed iconic and be given due consideration. Additionally, these views are experienced from our most lived in spaces, which as outlined in (S 6.3.7), should be given greater consideration.

Overall, section 3.4.3 of the Manly DCP states one objective of design to be " To minimise disruption to views from adjacent and nearby development and views to and from public spaces including views to the city, harbour, ocean, bushland, open space and recognised landmarks or buildings from both private property and public places". The current development plans do not appear to have minimised disruption to our views at all, and have certainly displayed no consideration for them in their reports or plans whatsoever. We believe that in relation to view sharing, the plans do not align with the Manly DCP guidelines.

We are hoping that an Independent View Impact Report will shed greater light on the precise amount of view loss. Regardless, the impact for us will undoubtedly be severe and at the very least should have been considered in the relevant plans and reports.

We also sympathise greatly with the properties behind the proposed development and agree with their objections and submissions regarding their extensive loss of ocean view.

3. LOSS OF LIGHT

In cohesion with the above issues, the development will significantly decrease the natural light that enters into our key living spaces and bedrooms on our southern wall, merely due to the

height of the building proposed for Lot 84. This issue will only be further worsened by privacy concerns that may lead to the necessity to close blinds more regularly during the day due to overlooking windows and balconies from the development.

The issue of light is referenced in Objective 3 of Section 4.1.3 of the Manly DCP in relation to Floor Space Ratio (FSR). Object 3 states "To allow adequate sunlight to penetrate both the private open spaces within the development site and private open spaces and windows to the living spaces of adjacent residential development." Lighting in neighbouring buildings is clearly an important issue, as is the FSR explored below, which is 65% over the required standard. A reduction in the size and most importantly height of this development would greatly improve this particular issue.

4. NON-COMPLIANT FLOOR SPACE RATIO

The proposed floor space ratio is approximately 65% over the Manly LEP development standards. This ratio will affect the beauty and livability of the area in the specific case of this development and again sets a concerning precedent that could have a very worrying ripple effect throughout Manly.

5. NON COMPLIANCE WITH DENSITY REGULATIONS

The proposed development is not only non-compliant with, but appears to completely disregard the Council's Residential DCP regulations. The DCP regulation for the area is 1 dwelling per 250sq mt, meaning that the development should have a maximum of 13 dwellings rather than the proposed 23. This is not only an issue in its own right, but sets a precedent that is extremely worrying for the neighbourhood and wider Manly residents.

6. NON-COMPLIANCE WITH HEIGHT REGULATIONS

With similar concerns and consequences as outlined in the above examples of non-compliance, the development also shows disregard to Clause 4.3 of the Manly LEP which states the maximum height to be 8.5 metres.

7. IMPROPER SETBACK PLANS

The plans to build a two story development just 2.4m from the pathway are incohesive with the neighbourhood and improper when viewed in with reference to the common layout of properties on Reddall Street. Any buildings with a similar set back are mere gardens or single story garages, rendering the proposed development unusual and overbearing in the context of the street. The streetscape aesthetic and atmosphere would be greatly diminished by this development if it is built using the current setback dimensions.

8. PROFOUND AND DAMAGING DECREASE TO PARKING

The off-street parking plans are clearly insufficient to cater for the 23 dwellings. With a total of 7 off-street parks for Building A and 31 for Buildings B and C (see Varga Traffic Report, p. 20), the allocation is very unlikely to be sufficient. With a proposed 62 bedrooms in the whole development, a mere 38 parking spots is out of touch with how many cars households are likely to have. It is relying on a best-case scenario and an availability of street parking that simply doesn't exist. The Varga Traffic is unrealistic and demonstrates a lack of understanding of the area, how busy it becomes in peak seasons, and how difficult parking already is without the added burden of 23 new dwellings. Whilst the plans may meet Council regulations, these

regulations have not been updated to account for the popularity of the specific Fairy Bower area in rapidly increasing traffic and parking concerns in recent years. The Northern Beaches Council is currently already looking at parking issues in Fairy Bower with far too many parking permits already existing for the amount of spots available. It is our opinion that a more thorough investigation of this needs to be undertaken of parking and traffic with particular reference to peak times when it is already profoundly difficult for residents, visitors, and beachgoers at Fairy Bower to find anywhere to park.

9. TRAFFIC

The traffic in the area, particularly on the upper end of Bower Street directly in front of the development is already extremely congested during peak times, often backing up down the street. Regardless of whether parking is more effectively dealt with (as above), an increase to 23 dwellings and a busy two-way car park driveway on that area of Bower Street is likely to significantly worsen traffic issues. There is also a very high pedestrian presence near the proposed drive-way as visitors to the area go to Fairy Bower and Shelley Beach which should also be taken into consideration.

10. EXCAVATION, MACHINERY AND NOISE CONCERNS DURING BUILDING PROCESS

We are very concerned about the significant noise and disruption that such a large development will cause in the area for a long period of time. If the development was within the required council guidelines the noise and disruption would be decreased to a level that we would be much more accepting of and able to cope with.

11. SIGNIFICANT INCREASE IN NOISE POST-COMPLETION

The sheer density of 23 dwellings in the allocated space will vastly increase the noise issues that we experience in our home. If the current plans are to go ahead, the livability of our home and the wider neighbourhood will be decreased. Noise and vibration concerns are clearly accounted for and noted as important considerations in Section 3.4 of the Manly DCP. Reducing the number of dwellings to below 13 as is permitted by the DCP and a respect for all other noted council guidelines that have been ignored would lessen the noise impact to a more manageable level.

12. STORM WATER AND SEWERAGE SUITABILITY AND ENVIRONMENTAL CONCERNS

Due to the size of the proposed development, inquiries must be made as to the ability of our local sewerage, storm water and drainage amenities to support such a rapid and significant increase in population density. This also raises significant environmental concerns with possible leakage into Cabbage Tree Bay Marine Park which is of utmost importance to the neighbourhood and Manly as a whole. We ask inquiries and inspections please be made regarding this concern.

13. LOCAL NATURE AND WILDLIFE

We are concerned about the loss of habitat for our local Bandicoot population and other native wildlife. A great deal of ring-tailed possums, bandicoots and even echidnas live in the area, and we are concerned about their loss of habitat and food sources. The current properties in the development area are host to a great deal of vegetation that we know, after 30 years of neighbouring the property, is home to a great deal of wildlife. Regardless of whether nests

were found (as referenced in the City Plan Report) it is undoubtable that the properties are currently used as habitat and feeding areas for bandicoots and possums. Currently, bandicoots are able to access the land through gaps in fences and the borders of the properties very easily. The proposed developments would not allow for this in its current state. We would like to suggest that, as Objective 6 in Section 4.1.5 of the DCP is to "Objective 6) To maximise wildlife habitat and the potential for wildlife corridors." that some further allowances and changes be made in this regard.

As we often see bandicoots, possums, and even echidnas near the road on both Bower and Reddal Street, and sadly often find their bodies hit by cars, our local animals cannot afford to have more habitat taken from them. At the very least some wildlife corridors or access into the development gardens would be needed to assist in this area.

The protection of the Cabbage Tree Bay Marine Park and all of the incredible wildlife that live there is also a concern relevant to the capacity of our storm water/sewage drains to deal with the significant increase in population that this development would cause. As expressed above, further investigation needs to occur to ensure adequate protection of the Marine Reserve.

14. AESTHETIC

We also object to the development on the basis that it will denigrate the natural beauty of the area with a high density, unsightly and bulky design that will ultimately compromise the aesthetic that is so loved in this area.

As is stated in section 3.4 of the DCP, "Development should not detract from the scenic amenity of the area. In particular, the apparent bulk and design of a development should be considered and assessed from surrounding public and private viewpoints."

This is a concern for us and many of our neighbours and the local community who visit the Fairy Bower area regularly. It is our opinion that a reduction in the density, height and number of dwellings would greatly improve the aesthetic in addition to the inclusion of a greater number of native plants.

CONCLUSION

Overall, it is evident that the vast majority of our objections and concerns could be largely dealt with if the development was to meet council regulations of the DCP and LEP. If the development were to be far less high, less dense, and contain less than 13 dwellings, it would be a start to creating a development that could complement the area rather than effect it so detrimentally.

Ultimately, we are by no means against a new development occurring. We are extremely supportive of progress and improvement in our beautiful neighbourhood. However, we are, in fact, extremely against a development that blatantly ignores council regulations, unreservedly neglects to mention or consider the closest neighbour's privacy and views and also fails to address extremely important neighbourhood and environment concerns.

We suggest that a low-density development of a small number of exclusive dwellings that mould to the local aesthetic, similar to that seen in Montpellier Place/College Green, would not only likely make greater financial sense to the owners, but, importantly, may be an asset to the local area in contrast to the presently proposed detriment.

Thank you very much for your time and consideration of our submission.

Kind regards,

Karen and Rod Duncan
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Manly NSW 2095