

The Manly Community Corso Precincts Objection to the revised plans for the RFW Commercial Development MP10_0159

Attention The Director Metro and Regional Projects South
Cc Chris King

Dear Director

The Corso Precinct strongly objects to the revised mainly commercial development, which will be situated in Wentworth St and South Steyne.

We were made aware of the revision a few days ago and are appalled at the timing of the deadline being only 3 weeks from the date of notification. This timing is scandalous with local elections imminent and no Precinct meeting scheduled until after the deadline. We also sit on other Boards and Committees, whose meetings have also been deferred until after the elections in October. This mirrors RFW's actions during the State elections when they attempted to slip their plans through under the now defunct 3A guise. The proponents sat on the community's objections for close to 10 months but expect us to respond in a matter of weeks! They have not listened to the people of Manly, Manly Council, or Mr. Baird in responding to the needs of the Manly Village community.

1. They believe that moving a pedestrian crossing will ease the traffic chaos which will result from their over development. We believe that this will in fact have a negative effect as pedestrians will still cross the road at the site of the current crossings thereby worsening the traffic chaos and increasing the risk of injury.
2. They have increased the residential floor space even though the community has insisted that the development is too bulky for this area.
3. They have made a small concession of a 6m setback from Wentworth Street but not South Steyne. This will have little positive impact on the residents of Wentworth Street and Victoria Parade. In fact over 100 residents of the Corso Precinct will still suffer a huge impact and devastating loss of views.

4. The Manly Village Public School (MVPS) is overcrowded and no concessions have been made at all, even though the Corso Precinct has written to the Department of Education suggesting that some of the land owned by the Department of Education be given to the School. These discussions are still in progress so we are at a loss to understand how plans can be drawn up without the full knowledge of the Department of Education. Is there something RFW isn't telling us?
5. Many of the community's objections have received no response from RFW, their justification being that they do not need to satisfy the Manly community even though the community has been a staunch supporter of the charity's activities for many, many years.
6. RFW state that there will not be a pub in the 165 room hotel but how can they give us this assurance when a hotel group has not yet been named. When the hotel is sold or leased it will be a decision made by the hotel group and out of RFW's hands.
7. Manly has 115 plus liquor outlets and as we sit on Manly Council's Safety Committee, we are very aware of the problems associated with alcohol. With its proximity to MVPS we are very concerned about the influence another alcohol outlet would have on the primary school children and, of course, on the country children who RFW states they care for. This is a huge issue which has been glossed over by RFW.
8. Our Mayor, Jean Hay, is very disappointed with the revised plans and feels that RFW is not listening to the Council or the Community. RFW has simply made a couple of very small concessions, otherwise presenting the original plans for approval.
9. We would also like to know what the process will be in the event that this oversized commercial development gets approval and then the developer submits a Section 96 after building has begun in order to get exactly what they wanted in the first place. We would like assurance that once approved, no changes to the building would be accepted.
10. We are very concerned with the Conclusion on page 126 of their justifying hype which says that "no unreasonable impacts on adjoining properties or the receiving environment will occur" We object strongly to this lie as the impact on the Corso Precinct Community will be huge!
11. Most Committees who will need to respond to this travesty will not be meeting until October and some even later so it is essential that the deadline for response is extended, otherwise we feel that the RFW is once again trying to slip under the radar with their huge, bulky, insensitive, mainly commercial development.

In conclusion, we feel that RFW has ignored the needs of the local Community. In a fair system we would have:

- Community participation in decision-making at every stage of the planning process. We would be really listened to instead of being paid lip service or simply ignored
- Protection of our natural and cultural heritage and local amenity, not a beachfront ruined by a large, bulky Surfers Paradise lookalike
- Local residents and communities given top priority in planning development, instead of greedy commercial developers

- Strategic planning based on sound objectives that protect the environment and enshrine good quality design which doesn't impact negatively on existing residents and schools
- Development which complies with the rules. RFW is bending rules and citing obscure bylaws as justification that they are abiding by the law
- Infrastructure which meets the needs created by the new development including community, not greedy developer, support from the Department of Planning and Infrastructure. We have to live here, you do not.

Regards
 Hania Norman
 Chairperson
www.thecorsoprecinct.com.au
hanianorman1@bigpond.com

Please find a letter attached for your perusal from Dept of Education

Dear Ms Norman

Please find attached a letter from Mr Tony McCabe, Director Planning and Delivery of today's date for your information.

Please do not hesitate to contact me should you require anything further.

Kind regards

Marisa Frangelli

Executive Assistant
 Planning and Delivery
 Asset Management Directorate
 Department of Education and Communities
 Level 4, 35 Bridge St, Sydney NSW 2000

Phone: 9561 8546 Email: marisa.frangelli@det.nsw.edu.au

Your message is ready to be sent with the following file or link attachments:

Royal Far West School

Ms H Norman
Chairperson Corso Precinct
Hanianorman1@bigpond.com

DOC 12/192204

Dear Ms Norman

Following on from Ms Dianne Murray, A/Deputy Director-General, Finance and Infrastructure's letter of 13 July 2012, I am writing to update you on the current situation regarding the Royal Far West School and Manly Village Public School.

Your suggestion that the Department consider exchanging its Royal Far West School site with Royal Far West (RFW) for a similar sized parcel of land adjacent to the Manly Village Public School site to provide additional play space is being considered.

The Department met with Lindsay Cane, CEO, Royal Far West, on 16 July 2012 to discuss all the options in relation to the Royal Far West School site. These discussions are continuing and it will take time to arrive at a suitable arrangement.

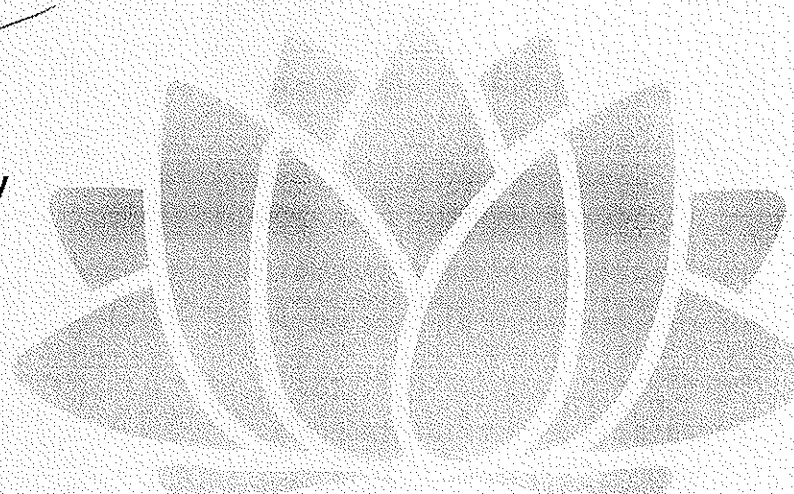
Unfortunately the Department is not in a position to provide any further information at this stage, but I assure you that the Department remains committed to providing the best delivery of education services to both the Manly Village Public School and Royal Far West School.

I trust this information is of assistance.

Yours sincerely



Tony McCabe
Director, Planning and Delivery
27 August 2012



Chris King - Royal Far West Application - Manly Attention Mr Chris King

From: "Ann Cameron" <oaklon@bigpond.net.au>
To: <plan_comment@planning.nsw.gov.au>
Date: 9/10/2012 9:22 AM
Subject: Royal Far West Application - Manly Attention Mr Chris King
CC: <ElectorateOffice.Manly@parliament.nsw.gov.au>, "Precincts"
<Precincts@manly.nsw.gov.au>
Attachments: RFW Mark 2 submission.docx

Dear Chris

Attached is the Fairy Bower Precinct Response to the token amendments to the Development Application for the Royal Far West School in Manly. Many of us are volunteers at RFW and feel that the 'Magic of Manly' that these disadvantaged children are able to enjoy when they are here will be lost forever if this plan is approved.

Regards
Ann Cameron
DA Coordinator
Fairy Bower Precinct
48 Bower St
Manly

0419630799

Royal Far West Redevelopment Preferred Project Report (PRP)

The Fairy Bower Precinct Meeting held on 5 September 2012 considered the amendments to the proposed Royal Far West Redevelopment Proposal. We were astounded that so few changes were proposed and that there was a completely inadequate response to submissions as illustrated below. Our objections/issues that were raised in relation to the previous proposed Royal Far West Redevelopment Plan and the Preferred Project Report's consideration (in italics) is as follows:

- Use of Ministerial Powers Under Part 3A of EP&A Act

The use of these powers circumvents the planning process and permits development that would otherwise be prohibited under the existing zoning and is contrary to Council's guidelines for the site. The Fairy Bower Precinct supports the guidelines Manly Council has prepared for the site.

Not addressed in PRP.

- Role and Responsibility of the RFW

The Precinct questions whether the RFW is fulfilling its charter as a 'not-for-profit' organisation and whether it is appropriate to take commercial advantage of the 'special use' zoning of the site in such a way as is proposed. The manner in which a 'special use' zone can be exploited under this model sets a very dubious planning precedent for special use zones across the State.

A copy of the Trust Deed pertaining to the site should be included in the information package provided on the Department of Planning's website.

Not included or commented upon in PRP.

- Bulk, Scale and Height

Height, bulk and scale of the proposal is considered totally inappropriate for the site creating overshadowing and privacy issues for Victoria Street residences and totally overwhelming the Manly Village school and playground area.

Not adequately addressed in the PRP. Overshadowing and privacy issues for Victoria Street residences still a major issue as are issues facing Manly Village Public School.

- Traffic, Access and Parking

Manly is already facing traffic gridlock and a development of this size will cause traffic chaos. To locate the main entrance to the carpark directly opposite the Coles car park entry is pure folly. Consideration should also be given to the loss of on-street parking which would inevitably arise from access ways and entrances to the various parts of the site particularly along the beach frontage and in Wentworth Street.

Issue completely ignored in the PRP. The main vehicular access has been retained directly across the road from the Coles Car Park despite assurances by the traffic engineers present at the RFW Open Day that this would be reviewed having acknowledged the problems it would create.

- RFW facilities

RFW facilities are located to the rear of the site and in particular the 'outdoor area' is wedged in between tall buildings. The current open area is on the beach frontage and provides the children with a wonderful environment for their outdoor activities not in a tunnel as is proposed. It is

questionable whether the best interests and well-being of the children are being given the priority they deserve.

Issue completely ignored in the PRP. The playground has not been relocated and remains at the rear of the site, in shade for most of the year.

- Displacement of Elsie Hill House Residents

The Precinct is particularly concerned about what will happen to the current residents of Elderslie House and feel the community has a social and moral obligation to provide affordable housing in this central location.

PRP response is outrageous. To justify the displacement of very vulnerable people on the basis of the fact that they moved in too late (ie after the applicable policy came into effect) shows that Royal Far West has lost its way in responding to community needs.

- Drummond House Curtilage

The proposed curtilage around Drummond House is insufficient as it will be dwarfed and overwhelmed by the proposed adjoining development.

Whilst some attempt has been made to improve the view to Drummond House from the east the buildings to the west still dwarf and overwhelm Drummond House.

From: Jane Nicholls <janenicholls@live.com>
To: <chris.king@planning.nsw.gov.au>
Date: 9/21/2012 4:24 pm
Subject: FW: Notification of Preferred Project Report for Concept Plan Application –
Redevelopment of Royal Far West School, 12-22 Wentworth Street, 16 South Steyne anad 19-21
South Steyne, Manly (MP10_0159)
Attachments: Views after Proposed RFW Development (with 6m setback).pdf

Hi Chris

I wanted to post the attached to the Department's website as suggested in Mark Schofield's letter of 30th August. However there no longer seems to be a access point for submissions in the Royal Far West section of the site as the Proposal is now being assessed. Can you advise?

Thanks

Jane

From: janenicholls@live.com
To: plan_comment@planning.nsw.gov.au
Subject: Notification of Preferred Project Report for Concept Plan Application – Redevelopment of
Royal Far West School, 12-22 Wentworth Street, 16 South Steyne anad 19-21 South Steyne, Manly
(MP10_0159)
Date: Fri, 21 Sep 2012 16:44:42 +1030

OBJECTION TO AMENDED PLANS FOR RFW DEVELOPMENT

For the Attention
of Chris King

Dear Chris

Royal Far West
have made a small adjustment to the building on the corner of Wentworth
St/South Steyne by proposing to set the development back 6m from the border of
the site. We note this setback is only from Wentworth Street and not from South
Steyne. The resulting effect on our views can be seen in the attached
photographs. We would still lose close to 50% of our view including the iconic
Wishing Well Kiosk, Cabbage Tree Bay and Shelley Beach. We feel this is too
small a concession and totally unacceptable.

The only other
significant change that we can see is the relocation of a pedestrian crossing
and a further pedestrian crossing to be installed further down Wentworth
Street. If RFW believe this will alleviate traffic concerns they are mistaken.
Infact we feel this would have a negative impact on traffic and pedestrians
who, from our observations, will still walk blindly across the intersection of
Wentworth St and South Steyne increasing the possibility of accidents and doing

little to alleviate traffic build up. The idea of siting the entrance to the underground car park almost directly opposite the entrance to the existing busy Council car park is folly. Already cars are struggling to enter and exit the car park especially on busy weekends as traffic backs up along Wentworth Street. Indeed we wonder how committed RFW really are to alleviating likely traffic problems, After all, they spent \$300,000 of RFW funds on a traffic survey, only for Richard Barron, RFW Chairman, to state to the Manly Daily "One objection is we're stuffing up traffic in Manly. Well, my opinion is the traffic in Manly is already stuffed up". This statement shows a disregard for the Manly community's concerns.

Further concerns

re alcohol, proximity to Manly Village Public School, use of Department of Education land, removal of low cost housing, overshadowing, size and scale, ratio of commercial to charitable use etc have not been addressed at all in the report.

In conclusion, whilst appreciating and supporting the work of RFW, we object strongly to this proposal and request that the Department of Planning and Infrastructure reject the Preferred Project Report in its current form.

Best regards

Jane and Martin
Nicholls

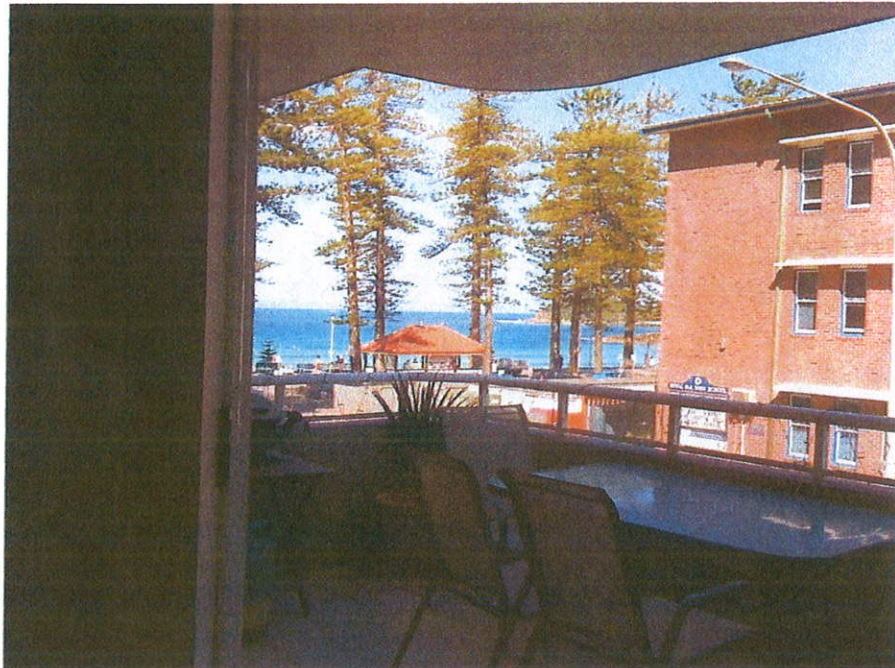
233/25 Wentworth
Street

Manly

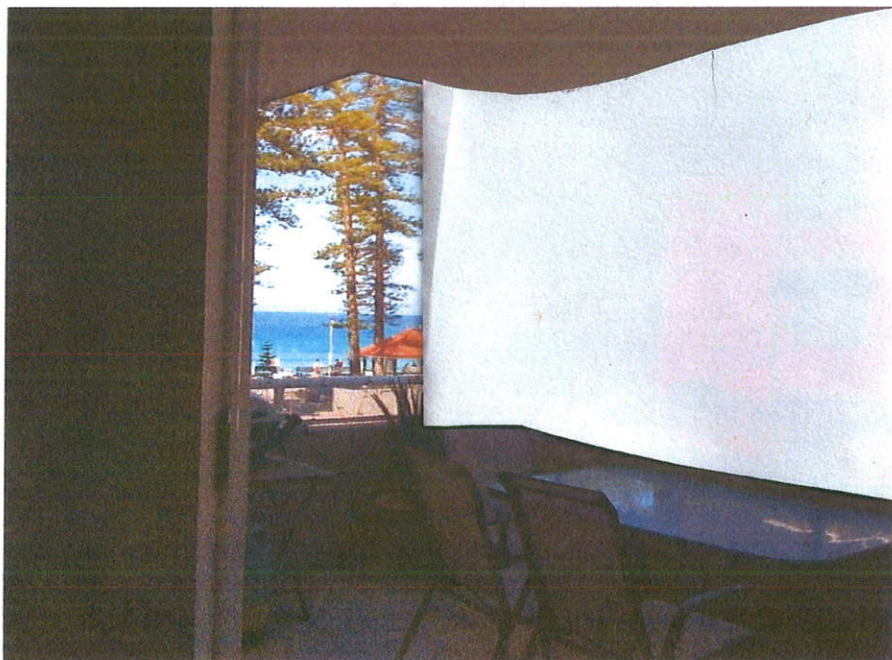
NSW 2095

233/25 Wentworth Street, Manly

Current view from Living Area



View after Proposed RFW Development (with 6m setback)

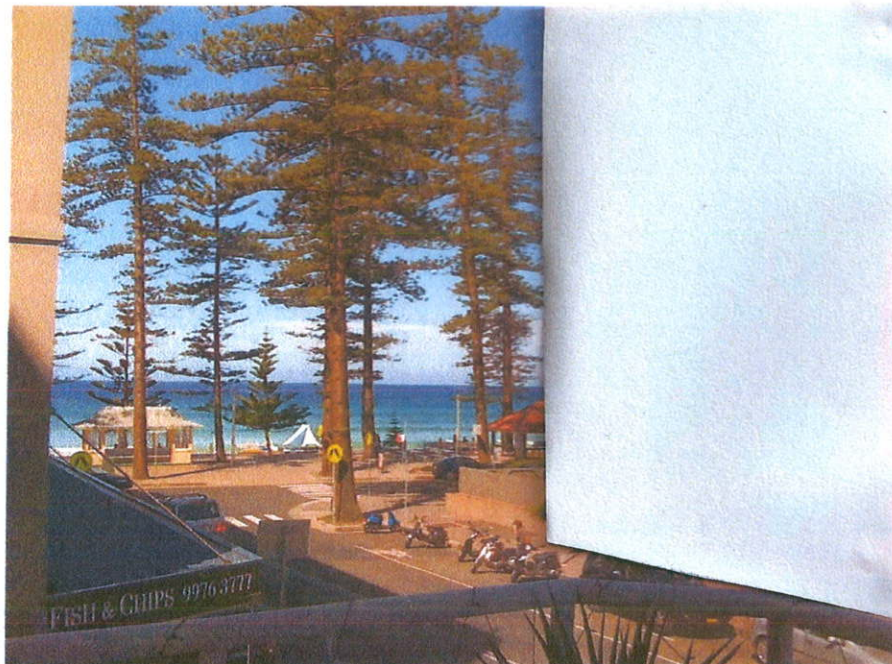


233/25 Wentworth Street, Manly

Current view from Balcony



View after Proposed RFW Development (with 6m setback)

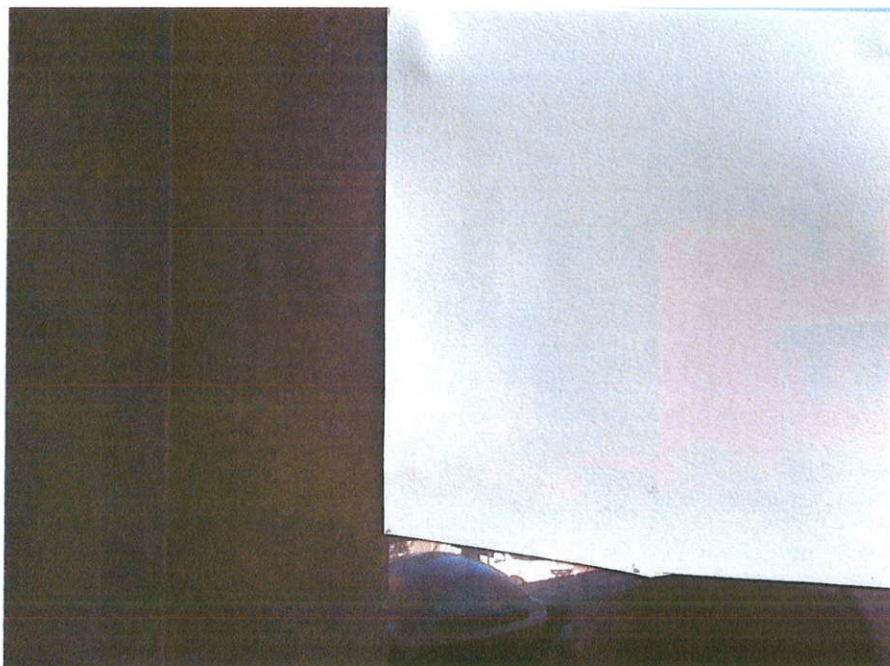


233/25 Wentworth Street, Manly

Current view from Bedroom 1

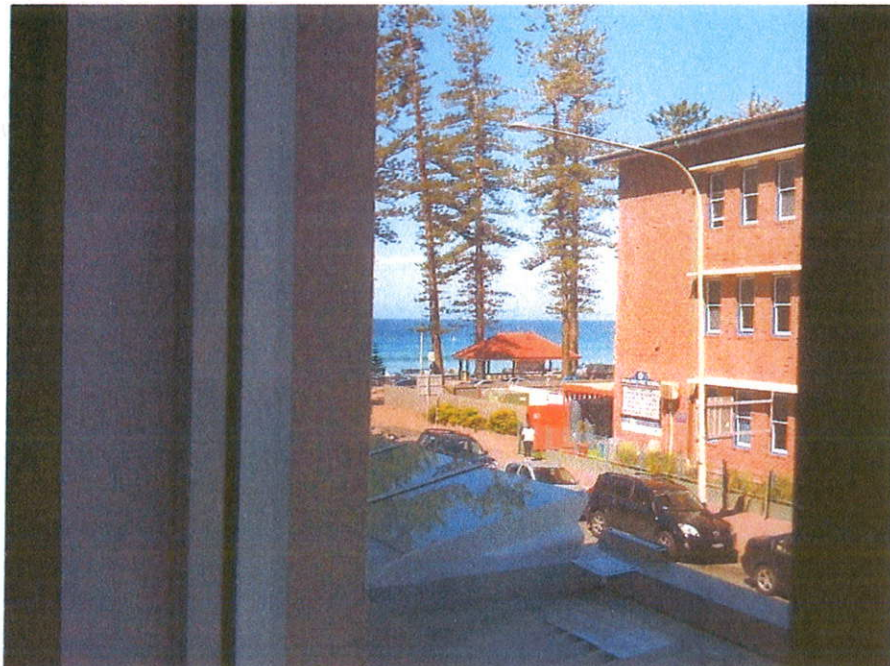


View after Proposed RFW Development (with 6m setback)



233/25 Wentworth Street, Manly

Current view from Bedroom 2

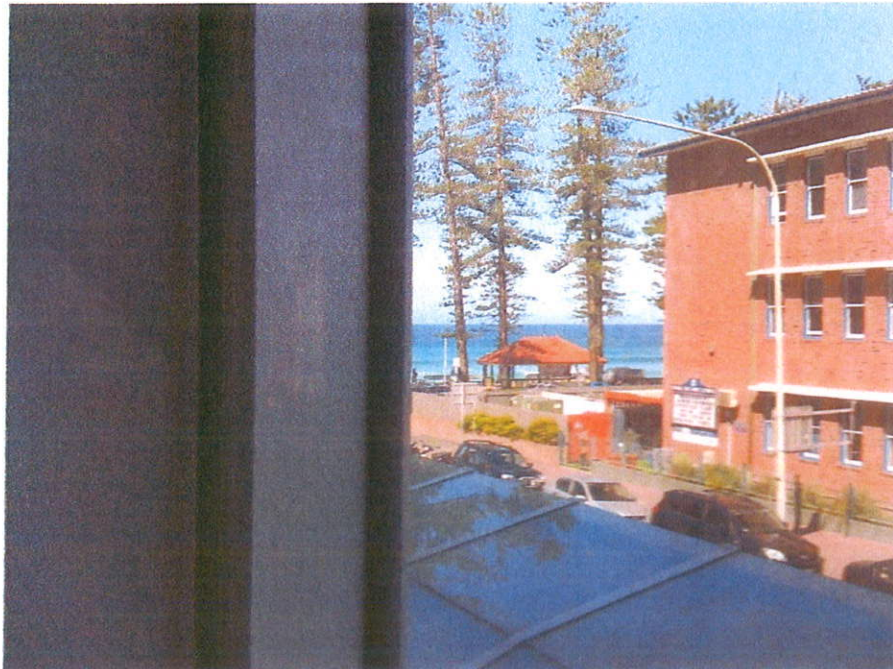


View after Proposed RFW Development (with 6m setback)



233/25 Wentworth Street, Manly

Current view from Bedroom 3



View after Proposed RFW Development (with 6m setback)





BAXTER & JACOBSON ARCHITECTS PTY LTD

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Nominated Architect: David Jacobson
NSW ARB Reg No: 4259 ABN: 95 088 328 769

SUBMISSION ON THE ROYAL FAR WEST HEALTH SERVICE PROPOSED PREFERRED DEVELOPMENT FOR ITS SITE BOUNDED BY WENTWORTH ST, SOUTH STEYNE AND VICTORIA PARADE

Introduction

This submission outlines objections to the amended proposal known as the Preferred Project which seeks approval for a mixed development comprising residential, commercial, retail, tourist (hotel) use as well as rebuilding new facilities to accommodate the activities of the RFWHS.

The application has been lodged under Part 3a of the State Government planning process and as such will be assessed by the Department of Planning on its merits. The Preferred project is an amended version of the original proposal. The proposed change involves setting the building on the corner of Wentworth and South Steyne back from the Wentworth St edge. There appear to be no other changes.

Issues raised in this report are largely unchanged from the original document reflecting the fact that there has been no fundamental rethink of the project as is required to address the issues.

The documents submitted present essentially a land use and volumetric and massing envelope with some indication of design intent.

Zoning

The current zoning is Special Purposes, which limits the land use to the activities of the RFWHS. However, under Part 3a, the specific zoning can be over ridden. In addition, Manly Council has been instructed by the Department of Planning to abolish all Special Purposes zonings and change them to be compatible with the surrounding land uses. Manly Council has chosen to rezone this site to Business Purposes and is awaiting Ministerial approval to exhibit a Draft LEP incorporating these changes.

Before analysing the specific proposal the following comments relate to the Department of Planning's directive to abolish Special Purpose zones:

Whilst there are no doubt institutions with surplus land which could be sold for other uses, once sold for a commercial value, the prospects of acquiring additional land in the future should the need arise becomes almost impossible and the stock of land available for educational, health, religious uses etc will be severely diminished over time.

Prior to the abolishing of Special Purposes zonings, institutions could seek to rezone surplus land. In this case however, the institution would need to make a case that such a rezoning was justified in order to obtain approval. This process therefore required the issue to be assessed on a case by case and site by site basis before a decision was made.

In the current situation, there is no scrutiny of this stage and the temptation for Institutions which are asset rich but cash poor (of which there are many) to sell off land will become very attractive as a short term solution.

It may well be that the RFWHS finds itself in this situation but we consider this would be to the long term detriment of the RFWHS

Planning Framework

Whilst the Department of Planning will assess the proposal on its merits, one of the criteria by which this assessment is to be made is the planning instruments which are in place governing the surrounding development.

The north of the subject site is situated in the Manly Business Zone. The planning standards are incorporated into the Business DCP which sets out both qualitative and quantitative controls. Height limits and Floor Space Ratios (FSR) have been carefully determined to allow urban renewal whilst protecting the scale of the built environment, heritage buildings and conservation areas.

Height limits are generally limited to 10 to 15 m with large sites permitted to reach a max of 25 m where the taller component can be screened by articulated buildings along the street frontages.

To the north of the site, along the beach front between Wentworth St and the Corso, heights are limited to 10 to 15 m and a floor space ratio of 2:0 to 1 or 2:5 to 1 is permitted. Immediately behind this block, to the west of Rialto lane is the Peninsular development which was subject to a site specific set of urban design guidelines with a max height of 25 m but with lower height limits along the Wentworth St and Darley Rd frontages and adjacent to the Heritage listed St Matthews Church. The Urban Design guidelines also required the provision of a public square linked to existing pedestrian laneways (Rialto square & Rialto lane).

Immediately to the south and west of the RFWHS site, land is zoned Residential with beachfront properties limited to 12m with a 1.5: 1 FSR. The area is dominated by existing buildings which exceed these height limits and FSRs.

Immediately to the west of these is the Maly Vilage Public Schol, with low buildings on the eastern boundary followed by playground areas. Like the RFWHS site, the school is in transition wfrom Special Purposes zoning to Busioness Zoning.

MANLY COUNCILS SITE GUIDELINES

In response the RFWHS Part 3a application, Manly Council prepared a specific set of Urban Design Guidelines for the site.

These guidelines established a series of building envelopes with varying heights and set backs with the aim to provide a significant redevelopment opportunity for the site at the same time as protecting:

- the heritage buildings on the site
- neighbouring heritage listed buildings
- heritage listed beach and promenade
- Manly Public School site to the west

The guidelines also seek to minimise loss of amenity to the surrounding area with respect to overshadowing, loss of privacy and views.

In addition, improvements to the public domain were canvassed by proposing through pedestrian links, a small public space and a wider footpath to Wentworth Street

A possible FSR of up to 3:1 was mentioned but Council has resolved to investigate this to ensure it would be compatible and moderated by the suggested building envelopes and other planning controls

The Proposal

The application seeks approval for a mixed use development comprising retail, commercial, residential, tourist (hotel) uses as well as renewing the existing RFWHS facilities.

Residential, retail and commercial usage and the continued operation of the RFWHS are desirable activities, however there is concern within the community as to the appropriateness of an additional hotel. Whilst this concern centres mainly around the bar facilities rather than the accommodation, the impact of the accommodation component due to its massing and servicing needs leads to adverse impacts detailed in this report.

All facilities have been accommodated in an envelope with a maximum height of 29.8m and a FSR of 3.2:1

The numeric values are well in excess of the standards outlined in the Manly Council Urban Design Guidelines (MCUDG) and the following section details the adverse impact resulting from this excesses:

Height (Tower buildings)

The hotel tower has a height of 29.8m above ground level, not including lift over runs and roof top services. In addition to exceeding the guidelines by 4.9m, the plan area of the tower is far in excess of the footprint allocated to this height in the MCUDG. The tower is also closer to the beach and promenade than the Peninsular tower (located to the north) and no analysis of afternoon winter or equinox shadowing of the beach promenade has been submitted.

To the south the hotel tower rises in a sheer wall immediately on the boundary adjoining heritage listed residential units (27 -29 Victoria Pde) and in close proximity to the heritage listed terraces on the RFW site. This excessive height and lack of articulated form produce an unsympathetic and unacceptable relationship to the heritage listed buildings.

From the heritage listed beach promenade, the height and extent of the tower will present as a wall totally out of keeping with the finer scale of buildings in the surrounding area. The proposed development when viewed from the north west will present as a sheer 29.8M wall rising abruptly and immediately behind heritage listed buildings of modest scale. We consider the impact of the proposal has not been given any serious urban design consideration.

From Wentworth Street, the vehicular access and the need for a port cochere for the hotel creates a break in the built form along the street frontage which again exposes the sheer height of the hotel tower.

The other tower on the site is the building immediately adjacent the Manly Village Public School and Community Centre buildings to house the RFWHS needs. This building has a height of 26.5M which is 9.5 m higher than the MCUDG height of 16m. The tower is located immediately opposite Rialto lane and sits above a three storey podium. The podium form is not typical of the Manly urban fabric and is a questionable approach given that it accentuates the height of the tower already in excess of the guidelines. The visual impact of this building on the school playground, loss of privacy issues and morning shading has not been analysed or quantified in the submission. There is no doubt however that there will be adverse impacts resulting from the scale of this building.

Streetscape – Urban Design

The submission does not provide significant detail as to the architectural approach other than documents referring to an appropriate beach style being developed. For such an important and visibly exposed site some detail studies of intent should have been produced to give a better understanding of this intent. The images presented in the submission indicate a tendency towards inner city commercial forms.

Comment has already been made about the urban form of the hotel tower opposite Rialto Square.

The remainder of the street front proposal is for the retention of Drummond House and the heritage terraces but with a new five storey building of 17M height fronting South Steyne and set back from Wentworth Street.

This new building includes ground floor retail and the top residential floor set back 2M from the both South Steyne and Wentworth Street boundary but the 2nd, 3rd and 4th floors with no setback. This building height is again in excess of the MCUDG which proposes articulated heights to emphasise corner areas and to respond to the scale of existing buildings. The podium of the development opposite along Wentworth St is typically only four stories with fifth floor set well back where it occurs..

From an urban design perspective there is a uniform height for the full extent of the building with no articulation to emphasise the corner of Wentworth street and South Steyne or to step down to a more appropriate scale adjacent to the heritage listed terrace. Such urban design considerations are essential in the context of Manly's rich tapestry of development and the lack there-of in this proposal is unacceptable.

The inclusion of the hotel generates the need for its own traffic management system and port cochere. This has created a gap in the streetscape along Wentworth Street which is dedicated to hotel use, building services and residential parking. More detailed investigation may result in a second vehicular access being required to separate these functions, further alienating this valuable space.