Revision July 2021 **B**.

SEPP 65 DESIGN VERIFICATION STATEMENT

Project No 5899 14-22 Wentworth Street & 19-21 South Steyne, Manly.

Prepared on behalf of

Royal Far West

Prepared by

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SECTION 1.0 SUMMARY

Introduction

This NSW State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development ('SEPP65') Design Verification Statement has been prepared on behalf of Royal Far West and to accompany a Section 75W application ('S75W') to modify a Part 3A (NSW EP&A Act) development consent (Application No MP10_0159) submitted to the NSW Department of Planning, Industry and Environment. This application relates to the redevelopment of the site at 14-22 Wentworth Street & 19-21 South Steyne, Manly ('the Site').

Background & site description

The overall site area is approximately 6,389 sqm and houses the children's charity, Royal Far West ('RFW'). This charity has been situated on the same site in Manly for nearly 100 years, harnessing the restorative power of the ocean as well as its own expert team to offer assistance to children and families in need, from rural and remote communities. This S75W application see the culmination of a plan to consolidated and reinvigorate Royal Far West's home in Manly.

The site of the proposed development can be identified as Lot 1 DP 1093126, Lot 2 DP 1093126, Lot 12 DP 1096038, Lot 1 DP 435023, Lot 1 DP 223468, Lot 2 DP 223468, Lot 101 DP 1247522 and PT 2587 DP 752038.

Key town planning references discussed in this document are as follows:

- 1. State Environmental Planning Policy No 65 Design Quality of Residential Apartment Development ('SEPP65').
- 2. NSW Apartment Design Guide 2015 ('ADG').
- 3. Manly Local Environmental Plan 2013 ('MLEP').
- 4. Manly Development Control Plan 2013 ('MDCP').
- Concept approval Part 3A (NSW EP&A Act) development, approval 28/04/2013, application # MP10_0159 ('the Part 3A').

We confirm that Mr Angelo Candalepas & Mr Glenn Murcutt both of Murcutt Candalepas Pty Limited have directed the design of the enclosed applications. This application is represented by Architectural drawings: S75W 0001, 0150, 1001 to 1012, 1060, 1070, 1080, 1101, 1102, 1201, 1351-1354, 1651-1655, 1801, 1851-1853 (all drawings labelled 'Issue B' dated 14.07.2021). Further, both Mr Candalepas & Mr Murcutt are registered as an Architect in accordance with the NSW Architects Act 2003.

As far as able to be reasonably incorporated into the design of a Section 75W modification application, we confirm that in our opinion the enclosed documentation achieves the design principles set out in *State Environmental Planning Policy* 65 - *Design Quality of Residential Flat Development* ('SEPP65') and has been designed with regard to the publication *Apartment Design Guide* ('ADG').

Brief overview of the proposed development.

This re-development proposal includes the following key aspects:

- 1. Demolition of existing structures on the site (including rear wings to Drummond House, RFW School Building & the former RFW Admin and Clinical Building)
- 2. Construction of a mixed-use building which includes 5 storeys of residential apartments ('Building C'). This building also includes 3 levels of commercial accommodation on the lower levels.
- Construction of a 5-storey residential apartment block ('Building D') which is aligned with the site's eastern boundary along South Steyne. This building comprises of approximately 16 residential apartments surmounting a landscaped open ground level.

- 4. Alteration and addition to the existing Drummond House ('Building B'). This building will comprise short stay guest accommodation and associated facilities for Royal Far West.
- 5. Minor alteration and addition to the existing Centre for Country Kids ('CCK Building 'A').
- 6. Construction of a two-level basement for vehicle parking, services and storage.

A basic summary of accommodation included in this proposal is as follows:

- 1. A mixture of one-bed, two-bed, three-bed and four-bed units providing a total of 58 residential units.
- 2. Commercial tenancies of approximately 3,277sqm.
- 3. Refurbishment, alterations, and additions to the existing Drummond House which will include 36 guest rooms.
- 4. The construction of a number of landscaped courtyards including the publicly accessible forecourt between Buildings C & D which also includes a through site link.
- 5. Basement parking which includes 223 parking positions.



Figure 1: The subject site. Source SIX Maps NSW; https://maps.six.nsw.gov.au

Concept development approval (Part 3A)

A Concept Plan (the 'Part 3A') approval was granted by the Planning Assessment Commission of New South Wales (PAC) as a delegate of the Minister for Planning and Infrastructure on the 18th April 2013 subject to conditions. The Concept Plan approval provides for a mixed-use development, described as follows:

- a) Use of the site for a mixed-use development with associated hospital facility, "Centre for Excellence";
- b) Indicative building envelopes for buildings to a maximum height of 8 storeys;
- c) Tourist and visitor accommodation, residential, retail/commercial and hospital/medical uses to a maximum FSR of 3:1;
- d) Basement car parking for 184 car spaces; and
- e) Landscaping area throughout the site.



Figure 2: Site Plan of the approved Part 3A application.

Key portions of the Part 3A Concept approval sought to be modified to import SEPP65 compliance is as follows:

- 1. **Communal and public open space** (ADG Part 3D & Part 4N). This modification seeks an expanded and more integrated landscape and open space strategy for the project. This includes for both the public realm as well as the Royal Far West clients and the residential apartment occupants. This modification sees a removal of the ground floor vehicle parking area, instead it is proposed to have no on grade parking, opening this area to a new public open space or forecourt with retail nodes for activation. Further it is proposed to relocate the enclosed podium communal open space (which is very overlooked and does not achieve the required solar access) to both the roof top and part of the landscaped ground plane.
- 2. Soft landscaping areas (ADG Part 40 & 4P). This modification application seeks a much more integrated landscape strategy including the lifting of the ground plane to achieve min 900mm soil planting zones and an integration of landscape planting to all rooftops in the development. Careful design planning has been undertaken to ensure that the new circulation cores and rooftop shade structures etc do not unduly impact solar access to neighbouring properties.
- 3. **Natural Cross Ventilation** (ADG Part 4B). The pattern of development proposed in the Part 3A Concept Plans does not readily facilitate an apartment design which achieves compliant or higher levels of natural cross ventilation.
- 4. Dual Aspect apartments (ADG Part 4D). The pattern of development proposed in the Part 3A Concept Plans includes a high number of single aspect apartments. The proposed modification includes a high number of dual aspect apartments and all their associated benefits e.g. high quality daylighting, high levels of natural cross ventilation, reduced building depth etc.
- 5. Visual Privacy (ADG Part 3F). The pattern of development proposed in the Part 3A Concept Plans include a number of apartments which look directly onto neighbouring properties for the principle living areas. The proposed modification re-orients the apartments to only face east/west, orienting the principle living spaces to only look eastwards. Further residential apartments on the taller Building C are located on the upper levels, above neighbouring properties.

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- 6. **Superior architectural expression** (ADG Part 4M). This proposed S75W application has the ability to achieve high levels of articulation and relief and has not been formulated around using a curtain wall type, shallow façade system. The Part 3A application included long uninterrupted and shadow facades which do not readily yield a high quality residential architectural expression.
- Vehicular Access (ADG Part 3H). The S75W modification seeks to consolidate vehicle access points in a single entry (as per ADG Part 3H-1) as well as removing on grade parking and vehicular drop off areas. This will result in a superior outcome for both pedestrian safety as well as a coherent urban form.



Figure 3: Part 3A Concept Plan - upper-level floor plan diagram examining a possible apartment configuration and the resulting natural ventilation outcomes.



Figure 4: Part 3A Concept Plan - podium level floor plan diagram examining the solar access to the communal open space.



Figure 5: An axonometric illustration of the Part 3A consent massing noting key areas sort to be modified with this S75W application.



Figure 6: North Elevation with Part 3A massing overlay in red showing limited openness on the ground plane.

SECTION 2.0 DESIGN QUALITY PRINCIPLES

PRINCIPLE NO. 1: CONTEXT AND NEIGHBOURHOOD CHARACTER

'Good design responds and contributes to its context. Context is the key natural and built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions.'



Figure 7: Photography of the site currently viewed from the Northeast.

The development site is located at the corner of Wentworth Street and South Steyne, Manly NSW. The site is opposite Manly Beach and promenade, is located in the Manly Town Centre and in close proximity to the *'the Corso'*. The beach environment creates a strong visual and sensory focus for the site and its surrounds. Significant proportions of activities in the local area make a direct link to this beach environment.

The topography of the site is that of a relatively flat beach side site with a slight fall towards the south east. The northern site boundary (parallel with Wentworth St) is approximately 105m long with the South Steyne frontage approximately 79m long. The surrounding immediate significant public domain (footpaths) are primarily paved with adjacent bitumen finished roadways. Forming a strong visual and spatial element in the immediate context is the avenue of Norfolk Island pine trees running along a number of streets in Manly including both South Steyne and Wentworth Street. Between South Steyne and Manly beach is a paved public promenade with a sea wall dividing this walkway from the beach foreshore.

The site's immediate built context consists of a variety of building forms, ranging in heights and uses. To the north is a variety of mixed use and residential apartment buildings, directly opposite the Site is the 5-8 storey Peninsula mixed use (residential, retail, supermarket etc) development which occupies a significant portion of the adjacent northern frontage to the Site. To the west is Manly Village Public School and between the school and the Site is the 2 storey 'art deco' No 12 Wentworth Street (now operating as a community centre). To the east is the roadway South Steyne and then the beach promenade and Manly beach itself. To the south of the site is (on Victoria Parade) is a range of predominately masonry, 4-6 storey residential apartment buildings, some of which have been recently extended and modified.

The proposed redevelopment of the Site seeks to achieve a compatibility of development both to the existing and future desired character of the area. Further the proposal is considered to be generally consistent with the earlier masterplan approval for the site, the Part3A. The project has loosely been divided into 4 separate building forms, arranged along a north/south axis. This partitioning of the development site into these 4 areas or buildings allows for a consideration of each portion of the development into a suitable

fine grain scale rather than one larger mass. Further this separation allows for the creation of important open spaces around theses building. The building forming the South Steyne street frontage ('Building D') is of a lower scale commensurate with the scale of buildings along South and North Steyne. Further this building is separated into two smaller separate buildings, affording a good degree of openness to the forecourt (and landscaping) behind.

The primary north south axis for the buildings in the proposal allows for a high degree of open space fronting Wentworth St. This includes the forming of a public forecourt space between Buildings C & D as well as presenting a small end elevation to the street. The taller Building C is well setback from the beach frontage of South Steyne and this S75W application allows for a variety of architectural devices to erode its mass, provide visual interest and provide an anchoring element in the project's overall composition. The adjustment of Building C Wentworth St setback has allowed for the removal of building accommodation at the base of Building D and along Wentworth St. This allows for significant amounts openness on the ground plane to be achieved and the consequential public space created whilst also allowing for commercial nodes under Building D to activate both South Steyne and the eastern side of the new forecourt space. on balance is considered a superior outcome to that presented in the Part 3A proposal.

As with many inner-city suburbs, the character of Manly is one under constant flux, balancing the amenity and a sense of place whilst also accommodating the need for the accommodation of more people (both to work and reside) such that a positive and sustainable built environment can be achieved. This proposed development seeks to strike this balance, making a strong and public gesture with is high degree of ground floor openness whist also carefully locating its accommodation in the most compatible areas of the site.



Figure 8: Diagram illustrating key element of the S75W ground floor plan.

PRINCIPLE NO. 2: BUILT FORM AND SCALE

'Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings. Good design also achieves an appropriate built form for a site and the building's purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements.

Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.'

This S75W application's building scale is guided by a number of key elements such as the site and its context and unique character, the client's brief as well as the applicable development controls applying to the site. This S75W application builds on the earlier Part 3A Concept masterplan approval for the site. The project's overall design sees refinements to the earlier masterplan consent with the S75W design being close in intent to this original approval.

Building bulk and scale is mediated across the site by making careful use of massing, proportion, architectural articulation, and open spaces to achieve an outcome which will enhance the local area. The lower scaled Building D faces the primary street frontage (South Steyne) with the building's form further eroded into 4 separately legible and finer scaled building wings. The larger Building C has been oriented to minimise its size, set back from the street and a future detailed development application can uses a variety of design strategies of also reduce an unwanted apparent bulk e.g., varying façade setbacks (to street and neighbouring developments), deeply recessed and layered architectural articulation (to create a rich interplay of light and shadow shadowing), modular well-proportioned façade compositions etc. Views of the site from the most active street frontage (Wentworth St) sees each building present their smaller narrow dimension. This allows for the formation of a public forecourt which further reduces the proposals visual bulk, creating a suitably scale and inviting public space with good views of the ocean through the under croft to Building D as well as a variety of uses to activate this space throughout the day.



Figure 9: An earlier artistic rendering (before the incorporation of advice from the NSW SDRP) perspective view looking south from Wentworth St towards the proposed development.

PRINCIPLE NO. 3: DENSITY

'Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context.'

The density of the proposed development is consistent with the approved Concept masterplan (the Part 3a) in both form and density. The amenity of the residential apartments proposed is high with many apartment attributes able to exceed the minimum design standards e.g. high levels of cross ventilation, solar access, generous private open space (the majority with ocean views), generous apartment internal areas, well design communal open space etc.

The development will provide housing opportunities within close proximity to employment opportunities, major transport routes, community facilities and Manly beach. Further the proposal includes suitable amounts of onside parking to accommodate these apartments' requirements (along with the other associate uses on the site).



The development is considered to have a density suitable to its context and use.

Figure 10: A conceptual north elevation (Section 75W application) showing the new public landscaped courtyard and active retail to the ground floor level (esp. to South Steyne).



Figure 11: An axonometric illustration of the proposed S75W modification massing noting key areas of benefit.

PRINCIPLE NO. 4: SUSTAINABILITY

'Good design combines positive environmental, social and economic outcomes. Good sustainable design includes use of natural cross ventilation and sunlight for the amenity and liveability of residents and passive thermal design for ventilation, heating and cooling reducing reliance on technology and operation costs.'

The design represented in this S75W application is capable of exceeds the targets set out in the NSW Building & Sustainability Index (BASIX) and the ADG and commits to the achieving of voluntary Greenstar development targets (as part of the original Part 3A application). The design represented in the S75W has the ability to include many simple, robust and long-lasting sustainable building design strategies which are integral with its design.

- 1. North easterly aspect to living spaces in 100% of the units to optimise solar access and daylight penetration.
- 2. An ability to achieve cross ventilation to apprx. 80% residential apartments with most apartments enjoying multiple aspects. Non-dual aspect units are provided with significant portions of façade and associated openings to achieve high levels of ventilation and daylighting etc.
- 3. An ability to make extensive use of sun-screening to most building openings with also generous northeast facing terraces and façade articulation. The west façade makes use of integral sun shading, mounted externally to prevent unwanted heat gain in summer whilst also allowing for more favourable heat gain in winter.
- 4. Generous amounts of landscaping with suitable amounts of rainwater capture and reuse to irrigate these landscaped areas. This amount of landscaped area will both help with local biodiversity (using native species to provide habitat) along with reducing heat loads (reducing thermal mass exposed to the sun as well as via evapotranspiration) whilst also providing a visually pleasing backdrop to its neighbourhood.
- 5. Use of a long lasting, aesthetically pleasing, and robust material palette. Some of these materials include low carbon high salt resistant concrete, bronze cladding, and trims and reused sandstone. These materials will translate into reduced and less intensive building maintenance and replacement cycles.
- 6. Reduced impacts on urban infrastructure expansion through adaptively repurposing exiting inner-city areas.
- 7. Commitment to voluntary Greenstar development targets.



Figure 12: An example reference design floor plan detailing noting residential apartment solar access (Building C).

PRINCIPLE NO. 5: LANDSCAPE

'Good design recognises that together, landscape and buildings operate as an integrated and sustainable system, resulting in attractive development with good amenity. A positive image and contextual fit of well-designed developments is achieved by contributing to the landscape character of the streetscape and neighbourhood.'

The landscape design for the project has been designed in collaboration with Jane Irwin Landscape Architecture ('JILA') and will provide a high-quality outcome for both the users of the development and the people of Manly. A key landscape feature of the proposal will be the new publicly accessible forecourt which runs along the long axis of the site (apprx. north/south). An important element of this new public space will be the inclusion of many medium to large native trees (e.g. *Angophora costata*). Given the proposed trees' size and location, they will provide both generous shade to this new forecourt space, as well as a pleasing visual outlook for development occupants and the general public.

Another important element in this new forecourt space is the connection to South Steyne. The design as represented in this Section 75W application sees a direct pedestrian link from the courtyard to South Steyne ensuring good amounts of activation from both the street as well as the commercial spaces adjacent.



Figure 13: A roof plan (Section 75W application) detailing the various areas which include landscape planting.

The project includes many landscaped and active rooftop oppurtunities including a communal residents' space in Building C, a rooftop play space for Building B (for Royal Far West children) and a non-trafficable looking garden to Building D. The design included in the S75W has the ability to enable these rooftop active areas to contain a variety of gather spaces, shade devices and communal use facilities such as BBQs. These areas can also be detailed (in a future detailed development application) to provide generous amounts of well-integrated soft landscaping. This planting will aid in reducing unwanted heat gain (e.g. heat island effect) as well as provide habitat, a connection to Country and buffering to increase visual privacy.

Please refer to the enclosed Landscape Architect's statement prepared by Jane Irwin Landscape Architecture for further details.



Figure 14: A sectional illustration (S75W) describing the connection of new courtyard space to South Steyne.



Figure 15: An illustration of potential areas of the project where engagement with Traditional Owners and first peoples can be exemplified.

PRINCIPLE NO. 6: AMENITY

'Good design positively influences internal and external amenity for residents and neighbours. Achieving good amenity contributes to positive living environments and resident well-being.'

The residential apartment design foreshadowed in this S75W application has been designed to achieve a high degree of amenity. This includes solar access, daylighting, natural ventilation, pleasing beach or district outlooks, good acoustic and visual privacy, good amounts of personal storage, generous apartments layouts, useful and pleasant private outdoor space as well as accessibility to all.

The overall buildings' form arrangements are such that they are oriented both towards beach views and towards the northeast for solar access. Further the arrangement has seen an opening up of the space between the buildings to now included a public accessible forecourt space. This space acts as important buffer for the residential components of the project, helping to mediate privacy as well as allowing the potential for natural venation (the S75W design allows for 100% of the units in Building D to be naturally ventilated and have a dual aspect) and a pleasant outlook (onto the tree canopy below). Also the S75W design allows for most units in Building C to be dual aspect and naturally cross ventilated. The reference design also includes single aspect units which are large and have a generous amount of façade exposure to allow for significant natural ventilation.

Visual privacy is able to be achieved both with building setbacks as well as more active elements such as fixed architectural screens to directed views and prevent unwanted visual connections. These screening devices are such that direct views into adjacent apartments or neighbours are prevented whilst they still allow for either a sky aspect (for Building C) or views to the public space and tree canopy below (Building D).



Figure 16: The reference design typical residential apartment floor plan detailing apartment cross ventilation paths for both Buildings C & D.

There is the ability for a later detailed development application to include a façade design which makes use of vertical fins to create deep recesses for inset balconies to enhance resident sense of protection whilst also allowing for good amount of façade relief and expression. These elements would be able to be carefully placed to prevent overlooking and shield against excessive solar gain, whilst still allowing for good amounts of daylight and air penetration. Openings are maximised where living areas and balconies are located.

This S75W application includes a number of communal open spaces catering to a variety of user activities. The project's communal open space areas are generous, functional, with the rooftop communal space afforded spectacular views of the district and Manly beach.

This S75W application includes the ability for residential apartment storage to eb able to exceed the ADG requirements due in part to the to the generous apartment area sizes and the efficient internal layout. The development is considered positively influences internal and external amenity for residents and neighbours.

PRINCIPLE NO. 7: SAFETY

'Good design optimises safety and security within the development and the public domain. It provides for quality public and private spaces that are clearly defined and fit for the intended purpose. Opportunities to maximise passive surveillance of public and communal areas promote safety.'

Aspects of safety and security have been carefully considered in the design. The project's guiding design strives for both a safe and secure home for its residents whilst also seeking to enliven the adjacent public surrounds i.e. not creating an exclusive fortress along Manly's foreshore.

Key safety and security design strategies that are able to be included in a future detailed development application are as follows:

- 1. Residential entry points and circulation areas are clearly identified and securable.
- 2. A secure perimeter to the courtyard space which will limit public access to the space i.e. no public access after hours.
- 3. A separation of residential and other building uses, entries etc. This is aimed to avoid incompatible user groups mixing.
- 4. High quality lighting system throughout the development to illuminate all accessways and circulation areas to all building areas (whilst also minimising glare to neighbours and the public domain).
- 5. Carpark design minimises 'dead ends' and inactive areas with a high degree of visual openness. Basement residential carpark lifts include their own separate secure lobbies.
- 6. A video access system at residential entry points linked to each apartment to allows controlled access into the development from inside. Also there will be a whole of building electronic access control system with fob keys supplied to occupants. This integrated access control system allows for regulated access through the development including the ground floor entry, communal open spaces, stairs as well as lifts, car park and other residential areas in the development.
- Active uses to the ground plane along with good passive surveillance from the apartments above (including fenestration design to allow for this surveillance without impacts on residents' visual privacy).



Figure 17: An illustration of the ground floor secure perimeter to the courtyard space.

PRINCIPLE NO. 8: HOUSING DIVERSITY AND SOCIAL INTERACTION

'Good design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets.'

The potential apartment design has been carefully considered throughout the development to ensure that future layouts remain universal and flexible and able to provide for a range of occupants. This S75W design allow for a design with living rooms generally located on the façade adjoining the inset balconies allow for good amounts of solar access. Further potential internal apartment areas and room sizes have been carefully considered with areas generally exceed ADG requirements. A detailed design can include a range of apartment sizes to cater for different user groups. These arrangements can include 1, 2, 3 and 4 bedroom apartments.

In accordance with the MDCP guidelines, this S75W has the ability to include 15 Adaptable units (representing over 25% of the units) in both two and three bedroom apartment configurations. In addition to these Adaptable units, this S75W design includes the provision for 20% of the residential apartments to achieve a Silver level of universal design features as per Livable Housing Australia's Livable Housing Design Guidelines.

This S75W design has the ability for residential units to be designed with open plan living areas adjoining kitchens to maximise the amenity throughout the living and dining areas, storage and or laundries to be conveniently located near to the entry and adjacent to the open plan living area, with supplementary storage located within the basement levels. Windows can be provided to direct the views such that visual privacy of the development and neighbours is respected.



Figure 18: A example of a possible residential unit floor plan (Building C) allow for in the Section 75W design.

PRINCIPLE NO. 9: AESTHETICS

'Good design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure. Good design uses a variety of materials, colours, and textures.'

Pleasing proportions are at the core of human aesthetics. The proposal is based around building forms with elegant horizontal proportions, a sense of depth and rhythm across the façades as well as high levels of building articulation.

This S75W allows for a future detailed development application which is able to include a detailed layering of façade elements. Examples of these elements could be sculptural off-form architectural concrete, bronze cladding, metal window framing with projecting sunshade hoods and fins as well as deep façade recesses have been used to ensure a both delicate and robust architectural expression. These elements would not be at the expense of the internal occupant amenity or the creation of an un-unified whole.

This S75W design is able to include a material palette of both long lasting and natural materials. These materials could include a combination of coloured and textured high quality off-form concrete, brickwork, bronze and aluminium metal trims, blades and the like, timber trims and mouldings, low profile metal framed glazing, bronze cladding, sandstone, and other durable, natural, and timeless materials. The use of these materials in a future detailed development application is able to be well integrated and intrinsic to the architectural expression (not an applied secondary applique). These materials are also considered appropriate for the local climate, durable and require less maintenance whilst also speaking to natural, eternal values associated with this beach side environment.

The building design (represented in this S75W application) positively responds to the principles of scale, proportion, and composition. This S75W design will offer a positive contribution to the changing character of the area.



Figure 19: A possible palette of façade elements for a future detailed development application.

APPENDIX A: SEPP 65 ADG Compliance Table.

ADG CRITERIA	COMPLIANCE	
Part 3: SITING THE DEVELOPMENT		
3A Site Analysis		
Objective 3A-1 Site analysis illustrates that design decisions have been based on opportunities and constraints of the site conditions and their relationship to the surrounding context.	A detailed development application is able to comply. Refer to Principle No. 1 within this report and the accompanying Architectural Development Application drawings.	
3B Orientation		
Objective 3B-1 Building types and layouts respond to the streetscape and site while optimising solar access within the development.	A detailed development application is able to comply. The proposed buildings' alignments are oriented both to allow for solar access into the residential apartments whilst also being respectful the existing street pattern and urban context.	
Objective 3B-2 Overshadowing of neighbouring properties is minimised during mid-winter.	Complies. The proposed overshadowing to neighbouring properties is similar to the approved development. The proposed RFW guest accommodation building (Building B) has been sculpted to allow for solar access onto the southern residential building at 25 Victoria Parade Manly.	
3C Public Domain Interface		
Objective 3C-1 Transition between private and public domain is achieved without compromising safety and security.	A detailed development application is able to comply.	
Objective 3C-2 Amenity of the public domain is retained and enhanced.	Complies. The project includes extensive ground floor open space including generous planting and views across the site to Manly beach along with suitable levels of activation.	

ADG CRITERIA	COMPLIANCE
3D Communal & Public Open Space	
Objective 3D- 1	
 An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping. Design Criteria 1. Communal open space has a minimum area equal to 25% of the site. 2. Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9am and 3pm on 21 June (mid-winter). 	A detailed development application is able to comply. The project includes a number of communal spaces able to be used and enjoyed by the residents. These include a ground floor forecourt, a ground floor low planted zone under Block D as well as roof top gathering areas on Block C. These areas are able to support a diversity of resident activities and receive generous amounts to solar access.
Objective 3D-2 Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting.	A detailed development application is able to comply. There are a number of different characters in the communal open spaces provided. These areas are all accessible and able to cater to a diverse range of user groups and activities.
Objective 3D-3 Communal open space is designed to maximise safety.	A detailed development application is able to comply.
Objective 3D-4 Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood.	A detailed development application is able to comply.
3E Deep Soil Zones	
Objective 3E-1 Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality. Design Criteria 1. Deep soil zones for sites >1500sqm are to meet a minimum dimension of 6m at 7% of the site area.	Complies with objective (numerical variation). The project does not strictly comply with the numerical guidance noted however a detailed development application can include a number of design solutions such that it is able to comply with the objectives of this control. These include: a. Ground floor tree planting zones to be 900mm deep. b. Rainwater collection, filtration and storage. No onsite detention is provided given the site's location in a flood prone area. It is noted that this design is consistent with the approved Part 3A Concept approval.

ADG CRITERIA	COMPLIANCE
3F Visual Privacy	
	Complies with objective (numerical variation).
	The project does not strictly comply with the numerical guidance for visual privacy noted however a future development application can include a number of design solutions such that it is able to comply with the objectives of this control i.e. achieve a reasonable level of external and internal visual privacy.
Objective 3F-1 Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy. Design Criteria 1. Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows: up to 12m (4 storeys) 6m between habitable rooms and balconies 3m between non-habitable rooms. up to 25m (5-8 storeys) 9m between non-habitable rooms. 4.5m between non-habitable rooms.	 These could include: a. Block B to Block C. i. Residential apartments are located on the upper levels of Building C (3 commercial levels below) such that they are above Building B. ii. Habitable rooms looking west make use of privacy screening such that views onto the accommodation of Building B are not possible (incl play space). These screens are such that they will allow the occupant to adjacent to allow for above the horizontal views as well as sun shading. b. Block C to Block D. i. Residential apartments are located on the upper levels of Building C (3 commercial levels below) such that they only coincide on two levels adjacent to Building D. ii. Building D habitable rooms looking west towards Building C can make use of privacy screening such that direct views onto Building C are not possible. These screens could be such that they will still allow the occupant to see views to the lower tree canopy and forecourt between the two buildings (aiding in passive surveillance). j. To neighbouring properties. i. The lower levels of Building C & D which coincide with the adjacent properties' northern openings do not contain windows. Upper level setback windows to Building C & D are designed such that direct view to neighbouring properties is not possible.
Objective 3F-2 Site and building design elements increase privacy without compromising access to light and air and balance outlook and views from habitable rooms and private open space.	A detailed development application is able to comply.
3G Pedestrian Access and Entries	
Objective 3G-1 Building entries and pedestrian access connects to and addresses the public domain.	A detailed development application is able to comply. The project includes a generous forecourt with generous amounts of soft landscaping and hardworks; such that it is understood to be an urban public space or public domain. The residential apartment entries all focus into and address this space as well as being able to South Steyne.

TERIA COM	IPLIANCE
3G-2 entries and pathways are accessible and Ade lentify.	tailed development application is able to comply.
3G-3	tailed development application is able to comply.
amo ad connection to destinations.	project includes a new public forecourt and generous unts of soft work landscaping. Further the project ides a number of pedestrian links from the courtyard to th Steyne.
le Access	
A de	tailed development application is able to comply
ccess points are designed and located to safety, minimise conflicts between ns and vehicles and create high quality pes.	S75W design proposes the use the current driveway tion for the vehicle access into the basement carpark. location sees pedestrian and car conflicts minimised by rationalising the entries into a single (rather than iple) entry as well as locating the entry away from the er intersection and more active pedestrian areas.
le and Car Parking	
3J-1	
ng is provided based on proximity to public in metropolitan Sydney and centres in areas.	tailed development application is able to comply
3J-2	
	tailed development application is able to comply
3J-3 design and access is safe and secure.	stailed development application is able to comply
3J-4	
	tailed development application is able to comply.
3J-5	
Not	applicable. on-grade car parking provided.
	applicable. above ground car parking provided.
Not	applicable. above ground car parking provided.

ADG CRITERIA	COMPLIANCE
Part 4: DESIGNING THE BUILDING	
4A Solar and Daylight Access	
Objective 4A-1	
To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space.	
Design Criteria	
 Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9am and 3pm at midwinter. A maximum of 15% of apartments in a building receive no direct sunlight between 9am and 3pm at midwinter. 	A detailed development application is able to comply.
Objective 4A-2	
Daylight access is maximised where sunlight is limited.	A detailed development application is able to comply.
Objective 4A-3	
Design incorporates shading and glare control, particularly for warmer months.	A detailed development application is able to comply.
4B Natural Ventilation	
Objective 4B-1	
All habitable rooms are naturally ventilated.	A detailed development application is able to comply.
Objective 4B-2	
The layout and design of single aspect apartments maximises natural ventilation.	A detailed development application is able to comply.
Objective AD 2	
Objective 4B-3 The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents.	A detailed development application is able to comply.
4C Ceiling Heights	
Objective 4C-1	
Ceiling height achieves sufficient natural ventilation and daylight access.	
Design Criteria	A detailed development application is able to comply.
1. Measured from finished floor level to finishedceiling level, minimum ceiling heights are:Habitable rooms 2.7mNon-habitable2.4mMixed use3.3m for ground and first floor	

ADG CRITERIA	COMPLIANCE
Objective 4C-2 Ceiling height increases the sense of space and provides for well-proportioned rooms.	A detailed development application is able to comply.
Objective 4C-3 Ceiling heights contribute to the flexibility of building use over the life of the building.	A detailed development application is able to comply.
4D Apartment Size and Layout	
Objective 4D-1 The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity. Design Criteria 1. Apartments are required to have the following minimum internal areas: Studio 35sqm 1B 50sqm 2B 70sqm 3B 90sqm The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5sqm each.	A detailed development application is able to comply.
2. Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms.	A detailed development application is able to comply.
 Objective 4D-2 Environmental performance of the apartment is maximised. Design Criteria 1.Habitable room depths are limited to a maximum of 2.5 x the ceiling height. 2. In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window. 	A detailed development application is able to comply.

ADG CRITERIA	COMPLIANCE
 Objective 4D-3 Apartment layouts are designed to accommodate a variety of household activities and needs. Design Criteria 1. Master bedrooms have a minimum area of 10sqm and other bedrooms 9sqm (excluding wardrobe space). 2. Bedrooms have a minimum dimension of 3m (excluding wardrobe space). 3. Living rooms or combined living/dining rooms have a minimum width of: 3.6m for studio and 1B 4m for 2B and 3B 4. The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts. 	A detailed development application is able to comply.
4E Private Open Space and Balconies	
 Objective 4E-1 Apartments provide appropriately sized private open space and balconies to enhance residential amenity. Design Criteria 1. All apartments are required to have primary balconies as follows: Studio 4sqm 1B 8sqm min. depth 2m 2B 10sqm min. depth 2m 3B+ 12sqm min. depth 2.4m 2. For apartments at ground level or on a podium or similar structure, a private open space is provided instead of a balcony. It must have a minimum area of 15sqm and a minimum depth of 3m. 	A detailed development application is able to comply.
Objective 4E-2 Primary private open space and balconies are appropriately located to enhance liveability for residents.	A detailed development application is able to comply.
Objective 4E-3 Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building.	A detailed development application is able to comply. Inset balconies contribute to overall façade articulation.
Objective 4E-4 Private open space and balcony design maximises safety.	A detailed development application is able to comply.

ADG CRITERIA	COMPLIANCE
4F Common Circulation and Spaces	
Objective 4F-1	
Common circulation spaces achieve good amenity and properly service the number of apartments.	
Design Criteria	A detailed development application is able to comply.
 The maximum number of apartments off a circulation core on a single level is eight. For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40. 	
Objective 4F-2	
Common circulation spaces promote safety and provide for social interaction between residents.	A detailed development application is able to comply.
4G Storage	
Objective 4G-1	
Adequate, well designed storage is provided in each apartment.	
Design Criteria	
 In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided: Studio 4cbm B 6cbm B 8cbm B 10cbm At least 50% of the required storage is to be located within the apartment. 	A detailed development application is able to comply.
Objective 4G-2	
Additional storage is conveniently located, accessible and nominated for individual apartments.	A detailed development application is able to comply.
4H Acoustic Privacy	
Objective 4H-1	
Noise transfer is minimised through the siting of buildings and building layout.	A detailed development application is able to comply.
Objective 4H-2	
Noise impacts are mitigated within apartments through layout and acoustic treatments.	A detailed development application is able to comply.
4J Noise Pollution	
Objective 4J-1	
In noisy or hostile environments, the impacts of external noise and pollution are minimised through the careful siting and layout of buildings.	Not applicable.

ADG CRITERIA	COMPLIANCE	
Objective 4J-2		
Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission.	A detailed development application is able to comply.	
4K Apartment Mix		
Objective 4K-1		
A range of apartment types and sizes is provided to cater for different household types now and into the future.	A detailed development application is able to comply.	
Objective 4K-2		
The apartment mix is distributed to suitable locations within the building.	A detailed development application is able to comply.	
4L Ground Floor Apartments		
Objective 4L-1		
Street frontage activity is maximised where ground floor apartments are located.	Not applicable.	
Objective 4L-2		
Design of ground floor apartments delivers amenity and safety for residents.	Not applicable.	
4M Facades		
Objective 4M-1		
Building facades provide visual interest along the street while respecting the character of the local area.	A detailed development application is able to comply.	
Objective 4M-2		
Building functions are expressed by the façade.	A detailed development application is able to comply.	
4N Roof Design		
Objective 4N-1	A detailed development application is able to comply.	
Roof treatments are integrated into the building design and positively respond to the street.	Planting on roofs provides a 'softening' of the building edge, in addition to providing visual interest from the public domain.	
Objective 4N-2	A detailed development application is able to comply.	
Opportunities to use roof space for residential accommodation and open space are maximised.	A large part of the communal open space is provided on the roof. These areas also include extensive softworks planting to help reduce unwanted thermal gain as well as providing a pleasurable outlook.	

ADG CRITERIA	COMPLIANCE
Objective 4N-3 Roof design incorporates sustainability features.	A detailed development application is able to comply.
40 Landscape Design	
Objective 40-1 Landscape design is viable and sustainable.	A detailed development application is able to comply.
Objective 40-2 Landscape design contributes to the streetscape and amenity.	A detailed development application is able to comply.
4P Planting on Structures	
Objective 4P-1 Appropriate soil profiles are provided.	A detailed development application is able to comply.
Objective 4P-2 Plant growth is optimised with appropriate selection and maintenance.	A detailed development application is able to comply.
Objective 4P-3 Planting on structures contributes to the quality and amenity of communal and public open spaces.	A detailed development application is able to comply.
4Q Universal Design	
Objective 4Q-1 Universal design features are included in apartment design to promote flexible housing for all community members.	A detailed development application is able to comply.
Objective 4Q-2 A variety of apartments with adaptable designs are provided.	A detailed development application is able to comply.
Objective 4Q-3 Apartment layouts are flexible and accommodate a range of lifestyle needs.	A detailed development application is able to comply.

ADG CRITERIA	COMPLIANCE
4R Adaptive Reuse	
Objective 4R-1 New additions to existing buildings are contemporary and complementary and enhance an area's identity and sense of place.	Not applicable.
Objective 4R-2 Adapted buildings provide residential amenity while not precluding future adaptive reuse.	Not applicable.
4S Mixed Use	
Objective 4S-1	A detailed development application is able to comply.
Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement.	The development is close to major transport centres such as ferry and buses.
Objective 4S-2 Residential levels of the building are integrated within the development, and safety and amenity are maximised for residents.	A detailed development application is able to comply.
4T Awnings and Signage	Г <u> </u>
Objective 4T-1 Awnings are well located and complement and integrate with the building design.	A detailed development application is able to comply.
Objective 4T-2 Signage responds to the context and desired streetscape character.	A detailed development application is able to comply.
4U Energy Efficiency	
Objective 4U-1 Development incorporates passive environmental design.	A detailed development application is able to comply.
Objective 4U-2 Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer.	A detailed development application is able to comply.

ADG CRITERIA	COMPLIANCE
Objective 4U-3 Adequate natural ventilation minimises the need for mechanical ventilation.	A detailed development application is able to comply.
4V Water Management and Conservation	
Objective 4V-1 Potable water use is minimised.	A detailed development application is able to comply.
Objective 4V-2 Urban stormwater is treated on site before being discharged to receiving waters.	A detailed development application is able to comply.
Objective 4V-3 Flood management systems are integrated into site design.	A detailed development application is able to comply.
4W Waste Management	
Objective 4W-1 Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents.	A detailed development application is able to comply.
Objective 4W-2 Domestic waste is minimised by providing safe and convenient source separation and recycling.	A detailed development application is able to comply.
4X Building Maintenance	
Objective 4X-1 Building design detail provides protection from weathering.	A detailed development application is able to comply.
Objective 4X-2 Systems and access enable ease of maintenance.	A detailed development application is able to comply.
Objective 4X-3 Material selection reduces ongoing maintenance costs.	A detailed development application is able to comply.

END.