

VISUAL IMPACT ASSESSMENT

Project No 5899

**14-22 Wentworth Street &
19-21 South Steyne, Manly.**

Prepared on behalf of

Royal Far West

Prepared by

**MURCUTT
CANDALEPAS**

**309 SUSSEX STREET
SYDNEY NSW 2000**

www.candalepas.com.au
info@candalepas.com.au

+61 2 9283 7755

1.0 Introduction

This Visual Impact Assessment 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').

This report examines key visual effects of the proposed redevelopment of the site with respect to its impacts to both key views from the public and also private domains. This Visual Impact Assessment has been prepared to both accompany and update the early project Visual Impact Assessment prepared by Architectus dated May 2011. This earlier report by Architectus accompanied the now approved Part 3A application. This Visual Impact Assessment includes photomontages and photos of the site and proposed development from the surrounding area, which serve to illustrate the potential impact of the proposed development on the existing visual environment.

This revision ('Issue C') of the report includes additional consideration of public and private views include an additional view along Wentworth St as well as a private view from No 29 Victoria Parade Manly.

This assessment has been based on the Architectural drawings prepared by Murcutt Candalepas dated 22nd December 2021, all labelled as 'Issue E'. These drawings include: S75W 0001, 0150, 1001 to 1012, 1060, 1070, 1080, 1101, 1102, 1201, 1351-1355, 1401, 1651-1659, 1801, 1802, 1851-1855.

This report has been updated to reflect the latest amendments made to the project's design during S75W application's assessment process (to date). Key amendments incorporated into the design include:

1. Reduction in the number of stories to the rear addition to Drummond House.
2. Increase to the front street setback to the side 'wings' elements to the rear addition to Drummond House
3. Increasing the side and rear boundary setbacks to both Buildings C & D.
4. Reconfiguration of uses to the ground floor (to both Buildings C & D).



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

2.0 Visual Environment

2.1 Existing local context

The overall development site area is approximately 6,389 sqm and is the headquarters of the children's charity, Royal Far West ('RFW'). 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.

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 southeast. 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.



Figure 2: Photography of the site currently viewed from the Northeast.

2.2 Development approvals (Part 3A)

A Concept Plan (the 'Part 3A') approval was granted by the Planning Assessment Commission of New South Wales (the '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:

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

We note that on the 6th May 2015, development application DA253/2014 involving Stages 1 and 2 of the Concept Plan was approved by the former Manly Council with such works described as follows: *Demolition of existing "Elsie Hill Building", construction of a six (6) story building "Centre for Child Health and Learning" over two (2) levels of basement car parking for (53) cars and the use of the building as clinical, educational and office facilities, alterations to Drummond House to connect to the new centre and landscape works.*

This consent has been fully implemented with an Occupation Certificate issued for the associated works. This Visual Impact Assessment has assessed the proposed S75W modification against the built form established in this Part 3A concept plan approval (Application No MP10_0159).

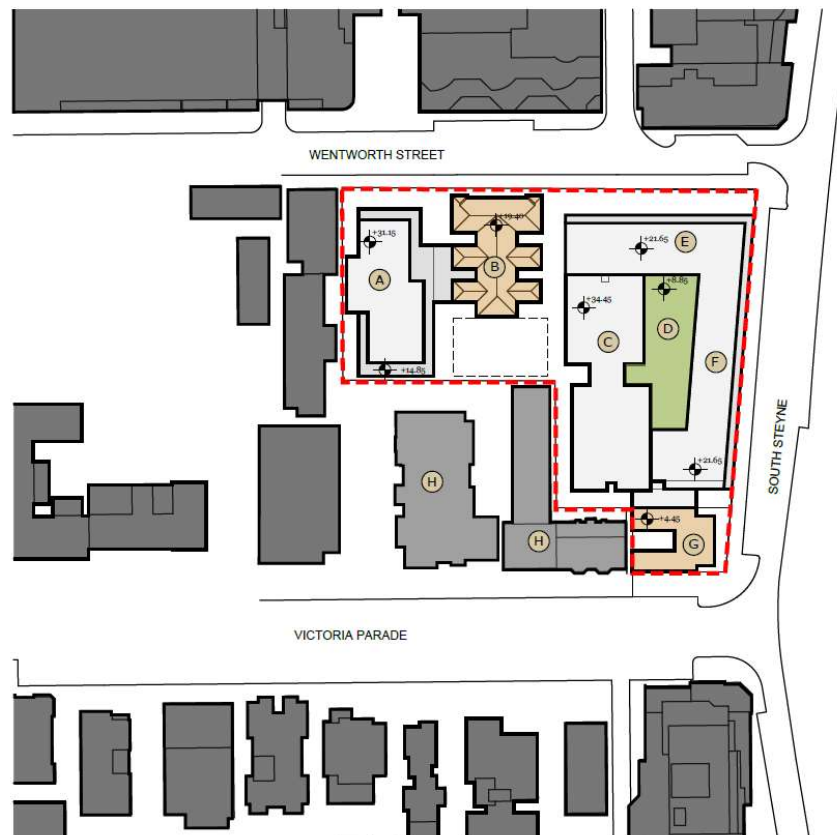


Figure 3: Site Plan of the approved Part 3A application.

2.3 Proposed Development

The 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.
3. 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').
2. Construction of a two-level basement for vehicle parking, services and storage.

A basic summary of likely 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.
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. 2 level basement including residential and commercial vehicle parking.

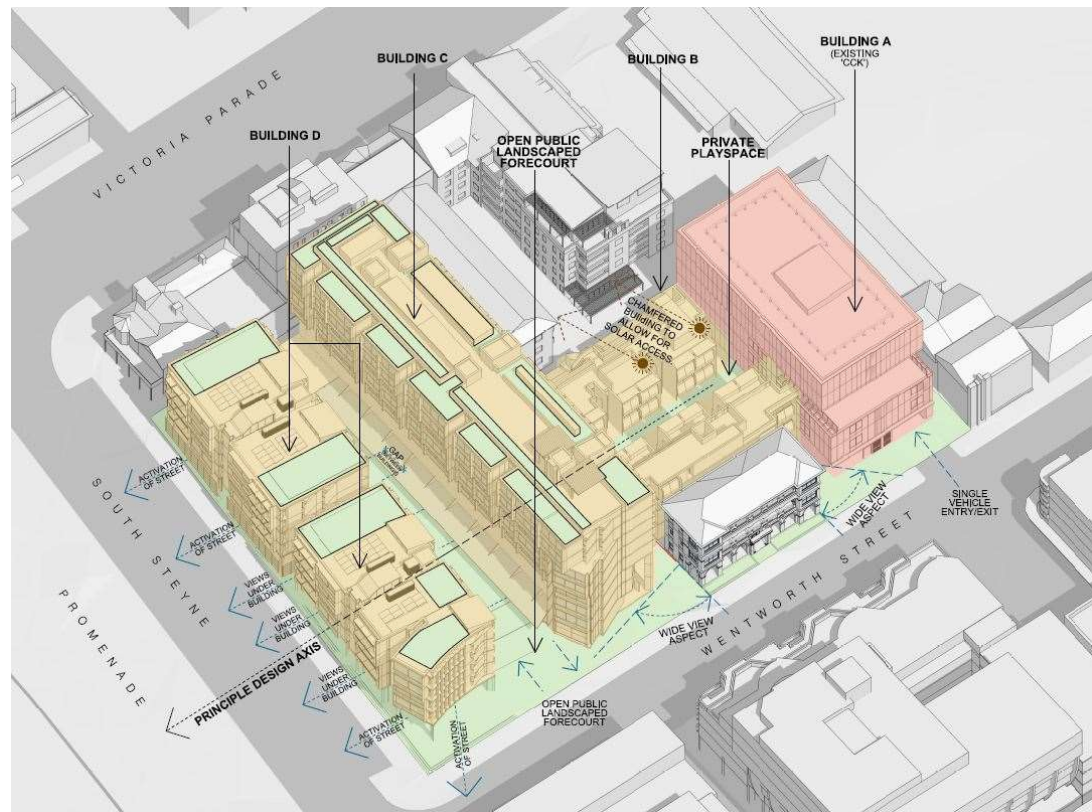


Figure 4: An axonometric illustration of the S75W modification noting its key aspects its design.

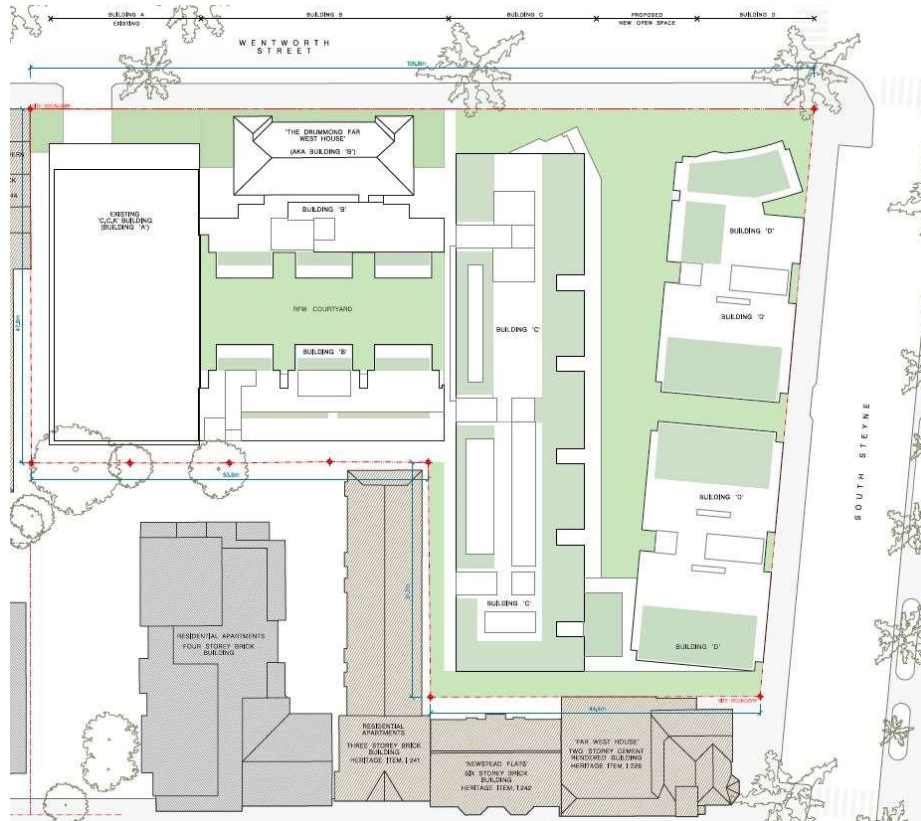


Figure 5: Site Plan of the proposed development

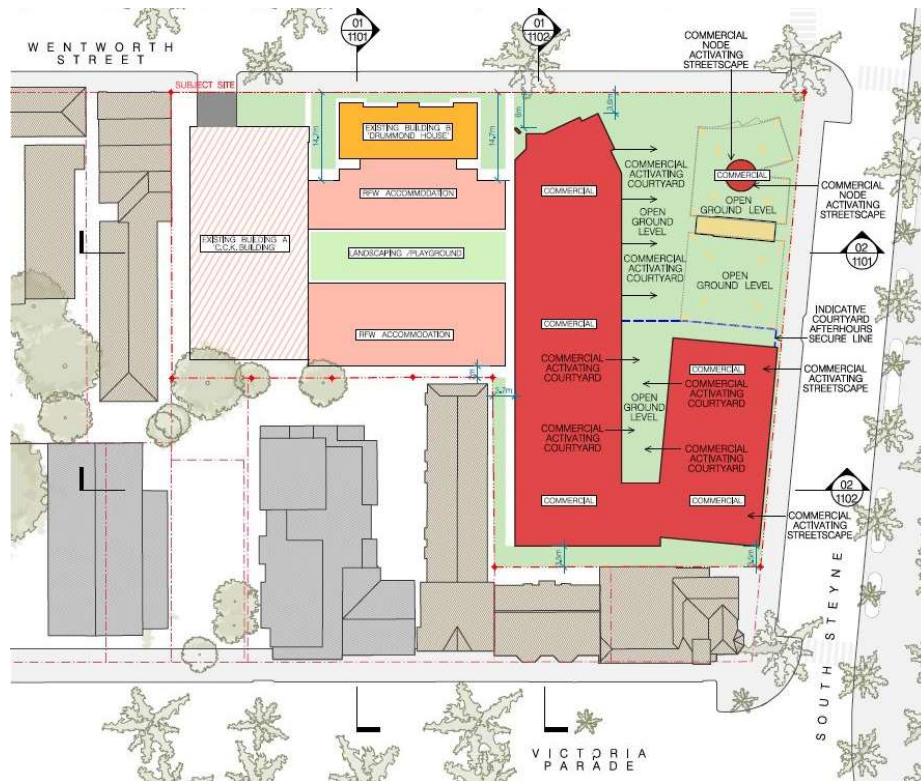


Figure 6: A diagram illustrating key design aspects of the S75W ground floor plan.

3.0 Methodology

3.1 General approach.

This Visual Impact Assessment has been prepared to both accompany and update the early project Visual Impact Assessment prepared by Architectus dated May 2011. This earlier report by Architectus accompanied the now approved Part 3A application. This Visual Impact Assessment therefore builds on the methodology established in this report. The methodology forming the basis of this earlier report includes the follow key aspects:

1. Field research.
2. Establishment of Assessment criteria.
3. Analysis of the existing visual environment in terms of immediate, local and regional contexts to select important viewing locations.
4. Visual simulations (photomontages) of the proposed development from important vantage points in the public domain within the visual catchment.
5. Description of the visual impact of the proposal from selected viewing points in terms of visibility and visual absorption capacity resulting in the visual impact for each view.
6. Consider views from the immediate vicinity (short range – within 200m of the site), local (mid-range – 200-500m from the site) and regional (long range – greater than 500m from the site).
This updated report has not considered public domain views of the proposal from the long or mid-range distance as it is considered that any differences between the original Part 3A approval and the proposed S75W modification will not be able to be discernible.
7. The views have been chosen to show a view of the development from designated viewing points at a single moment in time.
8. Digital photographs were taken from each of the selected viewing points in the direction of the proposed development. Details on the type of camera used are as noted in this report adjacent to each image.
9. The exact locations for this photography were obtain using a surveyor (using the appropriate surveying equipment) with this information was then imported into an electronic site survey.
10. A computer-generated 3D model of the proposed modification was prepared. For the purposes of this assessment, the computer model used is based on the reference design for the Section 75W application. The use of this reference design is considered to give a more realistic representation of expected outcomes with respect to visual impacts. It is advised that an additional assessment of the associated visual impacts of the proposed is undertaken at the detailed development application stage to confirm the work undertaken in this report as well as examine the more developed aspects of the design.
11. For each photography location, a corresponding view was constructed in the computer modelling software such that this view both represented the photography taken (e.g. camera's details etc) as well as included a representation of the proposed modification in 3d form.
12. This constructed view was then exported from the computer modelling software into photo editing software and overlaid with the digital photography to construct a photomontage view.
13. The photography views have been chosen to show a view of the development from designated viewing points at a single moment in time. The use of a single digital photograph has also been used to ensure accurate comparison as well as ensuring the image does not reflect multiple views and bias the assessment of the visual impact of the proposed development from the key immediate, local and regional vantage points.

To better understand this proposed S75W modification application and the differences between it and the original approved Part 3A application, each view included in this assessment (both public and private) compares the approved Part 3A application with that of the proposed S75W application.

As part of this Visual Impact Assessment, consideration has also been given to views from the private domain. A number of view simulations were undertaken from adjacent private residential apartments. The selection of these example views was informed by observations and conclusions made by the NSW Planning Assessment

Commission ('PAC') in their project assessment report and relate to the development at No. 25 Wentworth Street Manly as well as No. 29 Victoria Parade Manly.

This Visual Impact Assessment has considered the NSW Land and Environment Court ('LEC') photomontage policy¹ when preparing the photomontage images contained in this report. Key aspects of this policy included in this assessment are as follows:

1. Site photograph showing the current, unchanged view of the location depicted in the photomontage from the same viewing point as that of the photomontage.
2. 2D plan showing the location of the camera and target point that corresponds to the same location the existing photograph was taken.
3. Accurate 2D/3D survey data has been used to prepare the photomontage images.
4. Details of the Surveyor which provided the spatial reference material is noted in this report.
5. Details have been provided for the camera type and field of view of the lens used for the purpose of the photograph which the photomontage has been derived.

3.2 Visual Assessment (Public Domain)

In *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anr*², the Land and Environment Court established a 'planning principle' for assessment of visual impacts with respect to public domain views. This 'planning principle' involves a two-stage inquiry: the first is an identification stage with the second being more analytical.

Identification stage

- a. The nature and extent of any existing obstruction of the view.
- b. Relevant compositional elements of the view (such as is it static or dynamic and, if dynamic, the nature and frequency of changes to the view).
- c. What might not be in the view - such as the absence of human structures in the outlook across a natural area (such as the view from Kanangra Walls).
- d. Is the change permanent or temporary; or
- e. What might be the curtilages of important elements within the view

The second step is to identify the locations in the public domain from which the potentially interrupted view is enjoyed. The third step is to identify the extent of the obstruction at each relevant location. In this regard, the Court said that the impact on appreciation of a public domain view should not be subject to any eye height constraint. The fourth step is to identify the intensity of public use of those locations where that enjoyment will be obscured, in whole or in part, by the proposed private development.

The final step is to inquire whether there is any document that identifies the importance of the view to be assessed (such as heritage recognition) or where the applicable planning regime promotes or specifically requires the retention or protection of public domain views. The Court made it clear, however, that the absence of such provisions does not exclude a broad public interest consideration of impacts on public domain views.

Analysis stage

As part of this second analysis stage, the Court does not mandate derivation of any formal assessment matrix the analysis required of a particular development proposal's public domain view impact is both quantitative as well as qualitative, but '*this is not a process of mathematical precision requiring an inevitable conclusion based on some fit in a matrix*'.

The key factors articulated by the Court included the following:

1. is a planning document with an objective/aim for the maintenance, protection and/or enhancement of public domain views;

¹ <https://www.lec.nsw.gov.au/lec/practice-and-procedure/policies.html>

² <https://www.caselaw.nsw.gov.au/decision/54a639903004de94513da747>

2. whether the view that will remain after the development (if permitted) is still sufficient to understand and appreciate the nature of and attractive or significant elements within the presently unobstructed or partially obstructed view;
3. a qualitative evaluation requires an assessment of the aesthetic and other elements of the view. The outcome of a qualitative assessment will necessarily be subjective.
4. a high value is to be placed on 'iconic views'
5. a completely unobstructed view has value
6. Is any significance attached to the view likely to be altered?
7. Is the present view is regarded as desirable and whether the change makes it less so and why
8. Is the view a static or dynamic one should be regarded as positive or negative and why
9. if the view attracts the public to specific locations, why and how that attraction is likely to be impacted
10. whether any present obstruction of the view is so extensive as to render preservation of the existing view merely tokenistic
11. on the other hand, if the present obstruction of the view is extensive, whether the remainder warrants preservation
12. does the insertion of some new element into the view by the proposed development alter the nature of the present view?

Finally, the Court noted that '*a sufficiently adverse conclusion on the impact on views from the public domain may be determinative of an application. However, it may also be merely one of a number of factors in the broader assessment process for the proposal.*'

3.3 Visual Assessment (Private Domain)

The following view analysis has been undertaken with regard to the view sharing principles established by the NSW Land and Environment Court in *Tenacity v Warringah Council* [2004] NSWLEC 140³.

This 'planning principle' involves a four-step assessment to assist in deciding whether view sharing is reasonable. These steps are as briefly noted below:

- Step 1. Assessment of views to be affected, noting that water views are valued more highly than land views and iconic views are valued more highly than views without icons (e.g. Sydney Harbour Bridge and the like) and that whole views are valued more highly than partial views.
- Step 2. Consider what part of a private property the views are available from (i.e. principle living areas and private open space or non-habitable rooms)
- Step 3. Assess the extent of the impact for the whole of the property, not just for the view that is affected.
- Step 4. Assess the reasonableness of the proposal that is causing the impact. The final question to be asked is whether a more skilful design could provide the applicant/proponent with the same development potential and amenity and reduce the impact on the views of neighbours. If the answer to that question is no, then the view impact of the development would probably be considered acceptable and the view sharing reasonable.

It is to be noted that the visual impact assessment for the private views considered in this report for No. 29 Victoria Parade Manly have been prepared using computer simulated views only from the noted private apartment rather than a photomontage views using site photography. The computer simulation used for this work was prepared using land survey (prepared by a registered Surveyor) information for this property (and surrounding site) and included elements such as wall locations, window opening size and their location in space. This approach was adopted to still allow for an accurate consideration of view impacts to this private residence whilst not physically entering private property due to public health considerations related to the 2020-21 COVID pandemic.

³ <https://www.caselaw.nsw.gov.au/decision/549f893b3004262463ad0cc6>

Section 4.0 Visual impact assessment (public)

Views from prominent public places across the town centre area have been selected for visual impact evaluation based on their significance in terms of there being a major pedestrian route, gathering place or vantage point. Further this view selection has been informed by the analysis work undertaken in the earlier Part 3A Visual Impact Assessment prepared by Architectus dated May 2011.

The selected views are as follows:

- View 1.* Photography taken on Manly Beach/Corso street crossing (equivalent to View 13 – Architectus VIA);
- View 2.* Manly Beachfront (equivalent to View 14 – Architectus VIA);
- View 3.* South Steyne Crossing at Wentworth Street (equivalent to View 15 – Architectus VIA);
- View 4.* Sebel Hotel, South Steyne (equivalent to View 16 – Architectus VIA);
- View 5.* Corner of Wentworth St and Darley Rd (equivalent to View 17 – Architectus VIA);
- View 6.* Darley Rd, adjacent to the School (equivalent to View 18 – Architectus VIA);
- View 7.* East Esplanade, at pedestrian crossing (equivalent to View 19 – Architectus VIA);
- View 8.* Rialto Square (equivalent to View 20 – Architectus VIA);
- View 9.* View South-West down Wentworth street from South Steyne;
- View 10.* View South from corner of Wentworth & South Steyne.
- View 11.* View East from Wentworth Street
- View 12.* View West from South Steyne (looking towards No 29 Victoria Pde)

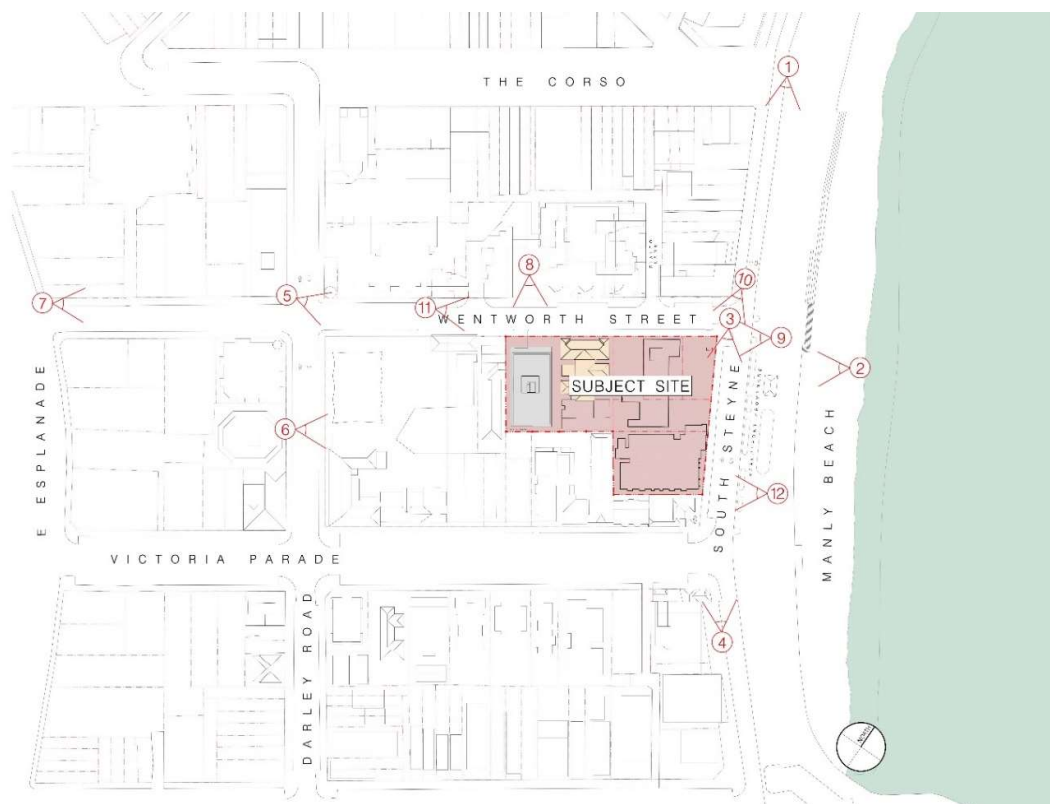


Figure 7. Locality plan noting view locations (public).

PHOTOMONTAGE VIEW 1 – MANLY BEACH PROMENADE



VIEW 1a: *Photomontage view of the Part 3A approved development from the Manly Beach Promenade looking south.*



VIEW 1b: *Photomontage view of the proposed S75W application from the Manly Beach Promenade looking south.*

VIEW 1(a & b) VISUAL ANALYSIS – MANLY BEACH PROMENADE

<i>Viewing Situation</i>	The Eastern side of the pedestrian crossing extending from the Corso.
<i>Category of View</i>	Street pedestrian view
<i>Distance of view</i>	200 metres
<i>RL of Camera</i>	6.510 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>

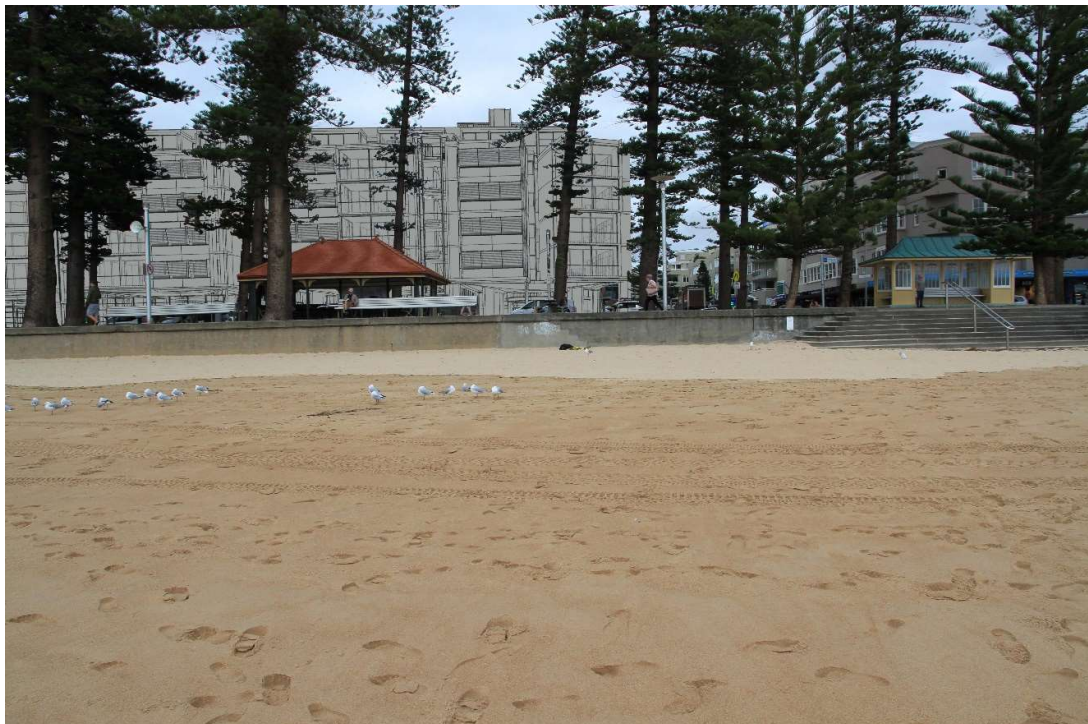


Figure 8: Key Plan of View 1 Location, Not to Scale.

PHOTOMONTAGE VIEW 2 – MANLY BEACH



VIEW 2a: *Photomontage view of the Part 3A approved development from the Manly Beach looking west.*



VIEW 2b: *Photomontage view of the proposed S75W application from the Manly Beach looking west.*

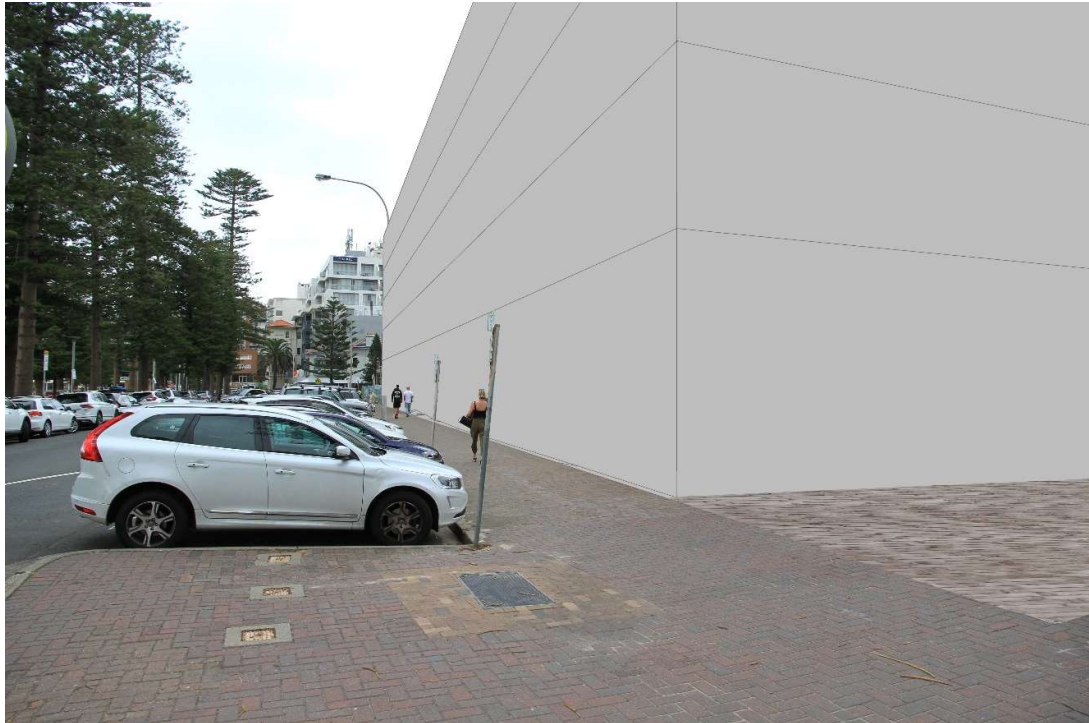
VIEW 2(a & b) VISUAL ANALYSIS – MANLY BEACH / CORSO PEDESTRIAN CROSSING

<i>Viewing Situation</i>	The Eastern side of the pedestrian crossing extending from the Corso.
<i>Category of View</i>	Pedestrian beach foreshore view
<i>Distance of view</i>	60 metres
<i>RL of Camera</i>	3.410 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>



Figure 9: Key Plan of View 2 Location, Not to Scale.

PHOTOMONTAGE VIEW 3 – SOUTH STEYNE CROSSING AT WENTWORTH STREET



VIEW 3a: *Photomontage view of the Part 3A approved development from near the corner of Wentworth St & South Steyne looking south.*



VIEW 3b: *Photomontage view of the proposed S75W application from near the corner of Wentworth St & South Steyne looking south*

VIEW 3(a & b) VISUAL ANALYSIS – SOUTH STEYNE CROSSING AT WENTWORTH STREET

<i>Viewing Situation</i>	From the pedestrian crossing extending from Wentworth Street to the beachfront.
<i>Category of View</i>	Street pedestrian view
<i>Distance of view</i>	40 metres
<i>RL of Camera</i>	6.150 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p> <p>We note that in this view, the proposed Section 75W scheme appears to include a noteworthy amount of openness to its courtyards space beyond as well as to landscape treatments (both immediate and more distant) when compared to the strong street edged scheme of the approved Part 3A design. It is likely that this openness will work in both directions i.e. allowing views both into and through the development which will likely result in a more visually interesting proposition (compared to the approved Part 3A scheme).</p>



Figure 10: Key Plan of View 3 Location, Not to Scale.

PHOTOMONTAGE VIEW 4 – SEBEL HOTEL, SOUTH STEYNE



VIEW 4a: *Photomontage view of the Part 3A approved development from near the Sebel Hotel looking north.*



VIEW 4b: *Photomontage view of the proposed S75W application from near the Sebel Hotel looking north.*

VIEW 4(a & b) VISUAL ANALYSIS – SEBEL HOTEL, SOUTH STEYNE

<i>Viewing Situation</i>	From the western side of South Steyne looking north near the Sebel Hotel.
<i>Category of View</i>	Street pedestrian view
<i>Distance of view</i>	130 metres
<i>RL of Camera</i>	5.540 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>



Figure 11: Key Plan of View 4 Location, Not to Scale.

PHOTOMONTAGE VIEW 5 – CORNER OF WENTWORTH & DARLEY STREETS LOOKING EAST



VIEW 5a: *Photomontage view of the Part 3A approved development from the corner of Wentworth and Darley Streets looking east.*



VIEW 5b: *Photomontage view of the proposed S75W application from the corner of Wentworth and Darley Streets looking east.*

VIEW 5(a & b) VISUAL ANALYSIS – CORNER OF WENTWORTH & DARLEY STREETS LOOKING EAST

<i>Viewing Situation</i>	The north western corner of Wentworth and Darley Streets.
<i>Category of View</i>	Street pedestrian view
<i>Distance of view</i>	200 metres
<i>RL of Camera</i>	6.750 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>

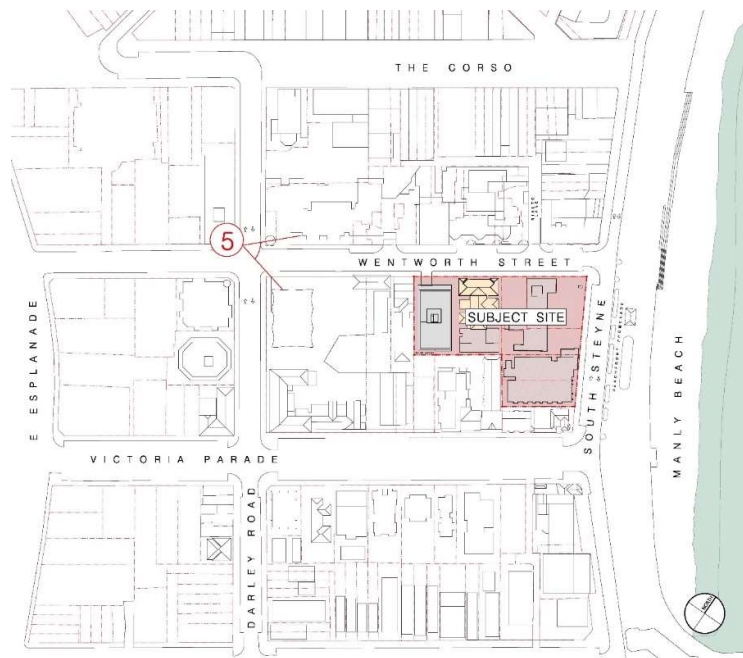


Figure 12: Key Plan of View 5 Location, Not to Scale.

PHOTOMONTAGE VIEW 6 – DARLEY RD, OPPOSITE MANLY VILLAGE PUBLIC SCHOOL LOOKING EAST



VIEW 6a: *Photomontage view of the Part 3A approved development from Darley Road (opp Manly Village Public School) looking east.*



VIEW 6b: *Photomontage view of the proposed S75W application from Darley Road (opp Manly Village Public School) looking east.*

VIEW 6(a & b) VISUAL ANALYSIS – DARLEY RD, OPPOSITE MANLY VILLAGE PUBLIC SCHOOL LOOKING EAST

<i>Viewing Situation</i>	Darley Street, opposite Manly Village Public School.
<i>Category of View</i>	Street pedestrian view
<i>Distance of view</i>	180 metres
<i>RL of Camera</i>	7.170 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>

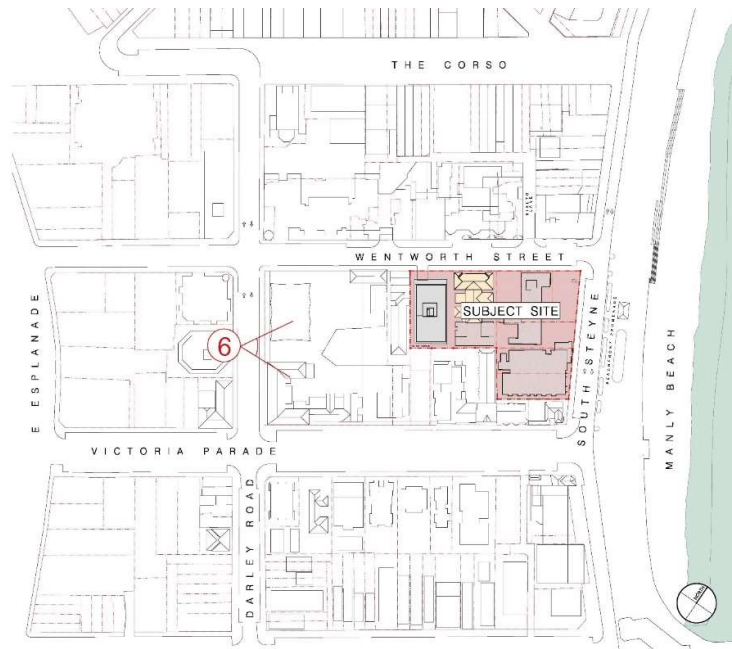


Figure 13: Key Plan of View 6 Location, Not to Scale.

PHOTOMONTAGE VIEW 7 – CNR OF EAST ESPLANADE & WENTWORTH ST LOOKING EAST



VIEW 7a: *Photomontage view of the Part 3A approved development from the cnr East Esplanade & Wentworth St looking east.*



VIEW 7b: *Photomontage view of the proposed S75W application from the cnr East Esplanade & Wentworth St looking east.*

VIEW 7(a & b) VISUAL ANALYSIS – CNR OF EAST ESPLANADE & WENTWORTH ST LOOKING EAST

<i>Viewing Situation</i>	East Esplanade, adjacent to the pedestrian crossing at Wentworth Street
<i>Category of View</i>	Street pedestrian view
<i>Distance of view</i>	330 metres
<i>RL of Camera</i>	6.790 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>



Figure 14: Key Plan of View 7 Location, Not to Scale.

PHOTOMONTAGE VIEW 8 – RIALTO SQUARE



VIEW 8a: *Photomontage view of the Part 3A approved development from the Rialto Square looking south.*



VIEW 8b: *Photomontage view of the proposed S75W application from the Rialto Square looking south.*

VIEW 8(a & b) VISUAL ANALYSIS – RIALTO SQUARE LOOKING SOUTH

<i>Viewing Situation</i>	The northern entry point to Rialto Square
<i>Category of View</i>	Public Plaza pedestrian view
<i>Distance of view</i>	30-60 metres
<i>RL of Camera</i>	6.630 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Minor impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are minor discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p>



Figure 15: Key Plan of View 8 Location, Not to Scale.

PHOTOMONTAGE VIEW 9 – CNR WENTWORTH STREET & SOUTH STEYNE LOOKING WEST



VIEW 9a: *Photomontage view of the Part 3A approved development from the cnr of Wentworth St & South Steyne looking west.*



VIEW 9b: *Photomontage view of the proposed S75W application from the cnr of Wentworth St & South Steyne looking west.*

VIEW 9(a & b) VISUAL ANALYSIS – CNR WENTWORTH STREET & SOUTH STEYNE LOOKING WEST

<i>Viewing Situation</i>	South Steyne promenade looking down Wentworth Street.
<i>Category of View</i>	Public View
<i>Context of viewer</i>	Pedestrians walking from the beach & South Steyne toward the Wentworth Street crossing
<i>Distance of view</i>	50 metres
<i>RL of Camera</i>	6.250 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Negligible impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are negligible discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p> <p>Similarly, as noted previously for View No 4b, this view of the proposed Section 75W scheme appears to include a noteworthy amount of openness to its courtyards space beyond as well as to landscape treatments (both immediate and more distant) when compared to the strong street edged scheme of the approved Part 3A design. This is likely to result in a more visually interesting proposition when compared to the approved Part 3A scheme.</p>

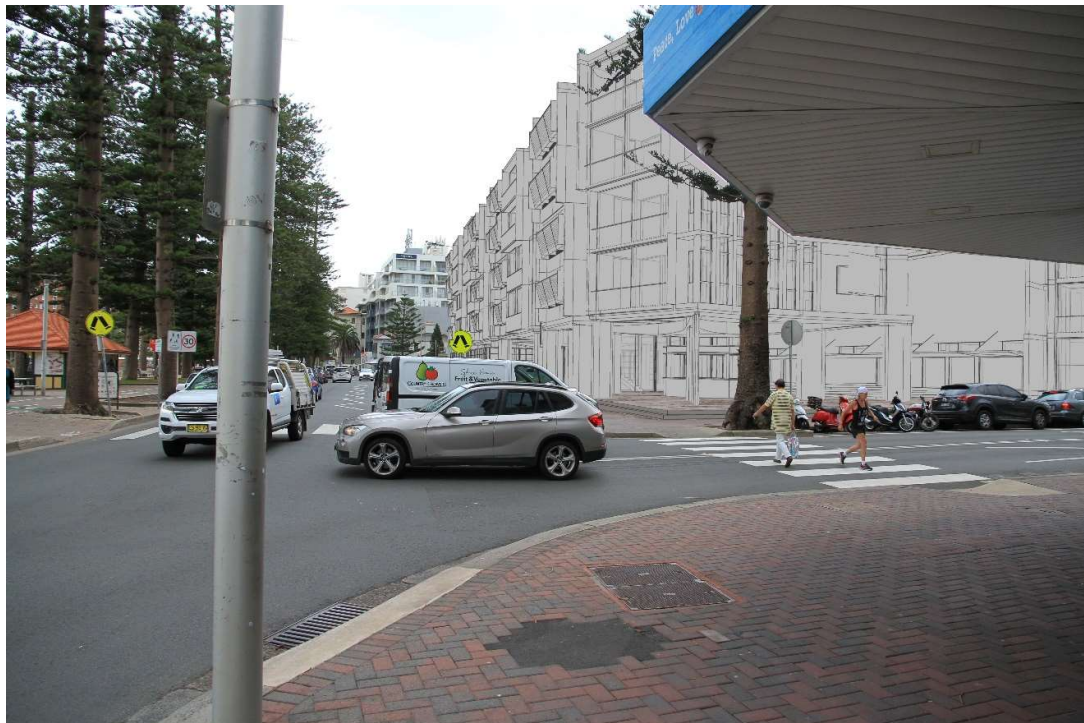


Figure 16: Key Plan of View 9 Location, Not to Scale.

PHOTOMONTAGE VIEW 10 – CNR WENTWORTH STREET & SOUTH STEYNE LOOKING SOUTH



VIEW 10a: *Photomontage view of the Part 3A approved development from the cnr of Wentworth St & South Steyne looking south.*



VIEW 10b: *Photomontage view of the proposed S75W application from the cnr of Wentworth St & South Steyne looking south.*

VIEW 10(a & b) VISUAL ANALYSIS – CNR WENTWORTH STREET & SOUTH STEYNE LOOKING SOUTH

<i>Viewing Situation</i>	View down South Steyne from corner of Wentworth Street.
<i>Category of View</i>	Public View
<i>Context of viewer</i>	Pedestrians & vehicles southbound along South Steyne.
<i>Distance of view</i>	50 metres
<i>RL of Camera</i>	6.220 AHD
<i>Date of photo</i>	23.02.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Minor impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are minor discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p> <p>Similarly, as noted previously for Views No. 3b & No. 9b, this view of the proposed Section 75W scheme appears to include a noteworthy amount of openness to its courtyards space beyond as well as to landscape treatments (both immediate and more distant) when compared to the strong street edged scheme of the approved Part 3A design. This is likely to result in a more visually interesting proposition when compared to the approved Part 3A scheme.</p>

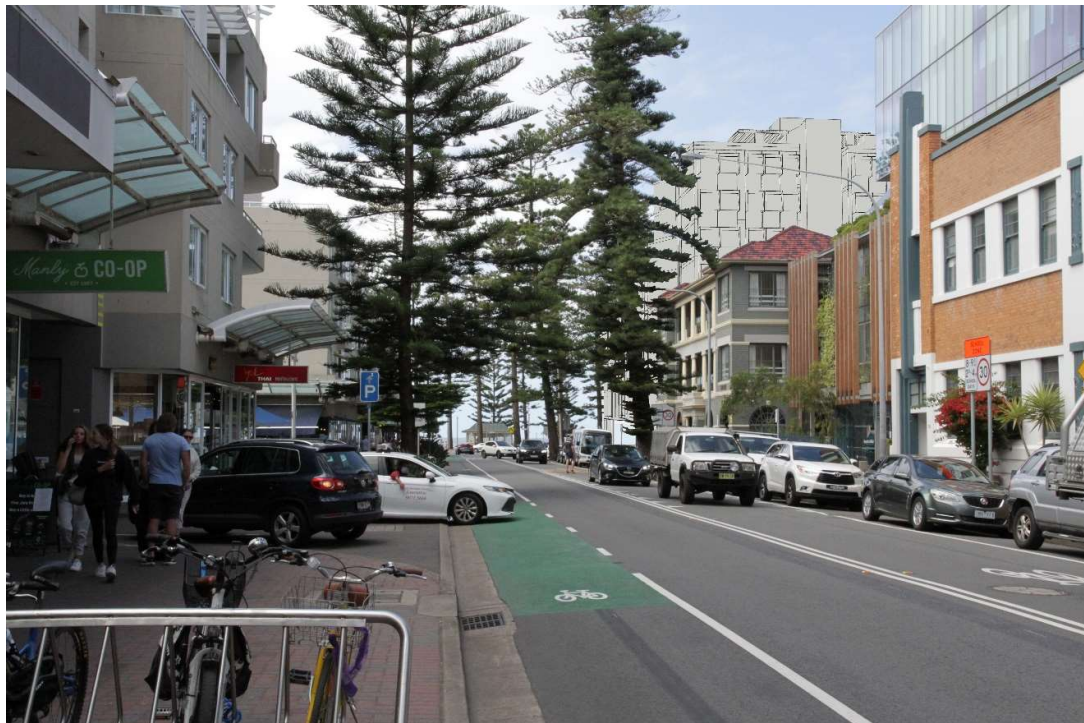


Figure 17: Key Plan of View 10 Location, Not to Scale.

PHOTOMONTAGE VIEW 11 – WENTWORTH STREET LOOKING EAST



VIEW 11a: *Photomontage view of the Part 3A approved development from Wentworth St looking east.*



VIEW 11b: *Photomontage view of the proposed S75W application from Wentworth St looking east.*

VIEW 11(a & b) VISUAL ANALYSIS – WENTWORTH STREET LOOKING EAST

<i>Viewing Situation</i>	View east down Wentworth Street from the northern footpath
<i>Category of View</i>	Public View
<i>Context of viewer</i>	Pedestrians & vehicles eastbound along Wentworth Street.
<i>Distance of view</i>	150 metres
<i>RL of Camera</i>	6.480 AHD
<i>Date of photo</i>	24.10.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Moderate to severe impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are noteworthy additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application.</p> <p>The proposed Section 75W scheme is prominent within the view and will obscure portions of the sky and the upper most portion of a pine street tree. This obscuring is not considered to obstruct any iconic views. This viewpoint is considered to be a dynamic one i.e. the viewer would most likely be in motion.</p> <p>Given that the proposed S75W design is prominent in this view and given the nature of this assessment (to accompany a concept plan application), little consideration is given here as to the qualitative aspects of the S75W proposal's architectural design i.e. aesthetic elements such as materials, shadow and light, composition etc. It is recommended that an assessment be undertaken at the detailed design stage of the project to better understand these aspects of the design and their proposed aesthetic contribution to this view.</p>



Figure 18: Key Plan of View 11 Location, Not to Scale.

PHOTOMONTAGE VIEW 12 – SOUTH STEYNE LOOKING WEST



VIEW 12a: *Photomontage view of the Part 3A approved development from South Steyne looking west.*



VIEW 12b: *Photomontage view of the proposed S75W application from South Steyne looking west.*

VIEW 12(a & b) VISUAL ANALYSIS – WENTWORTH STREET LOOKING EAST

<i>Viewing Situation</i>	View west from South Steyne beachfront promenade towards existing terrace
<i>Category of View</i>	Public View
<i>Context of viewer</i>	Pedestrians
<i>Distance of view</i>	40 metres
<i>RL of Camera</i>	5.630 AHD
<i>Date of photo</i>	10.12.21
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Minor impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are minor discernible additional visual impacts here when comparing the approved Part 3A design with that of the proposed Section 75W modification application. It should also be noted that from an urban design/ street form perspective, wide (especially ground floor) side setbacks can result in an erosion of the coherence and legibility of the streetscape.</p>



Figure 19: Key Plan of View 12 Location, Not to Scale.

Section 7.0 Visual impact assessment (private)

As part of this Visual Impact Assessment consideration has also been given to views from the private domain. A number of view simulations were undertaken from adjacent private residential apartment. The selection of these example views was informed by observations and conclusions made by in the NSW Planning Assessment Commission ('PAC') in their project assessment report and relate to the developments at No. 25 Wentworth Street and No. 29 Victoria Parade, Manly.

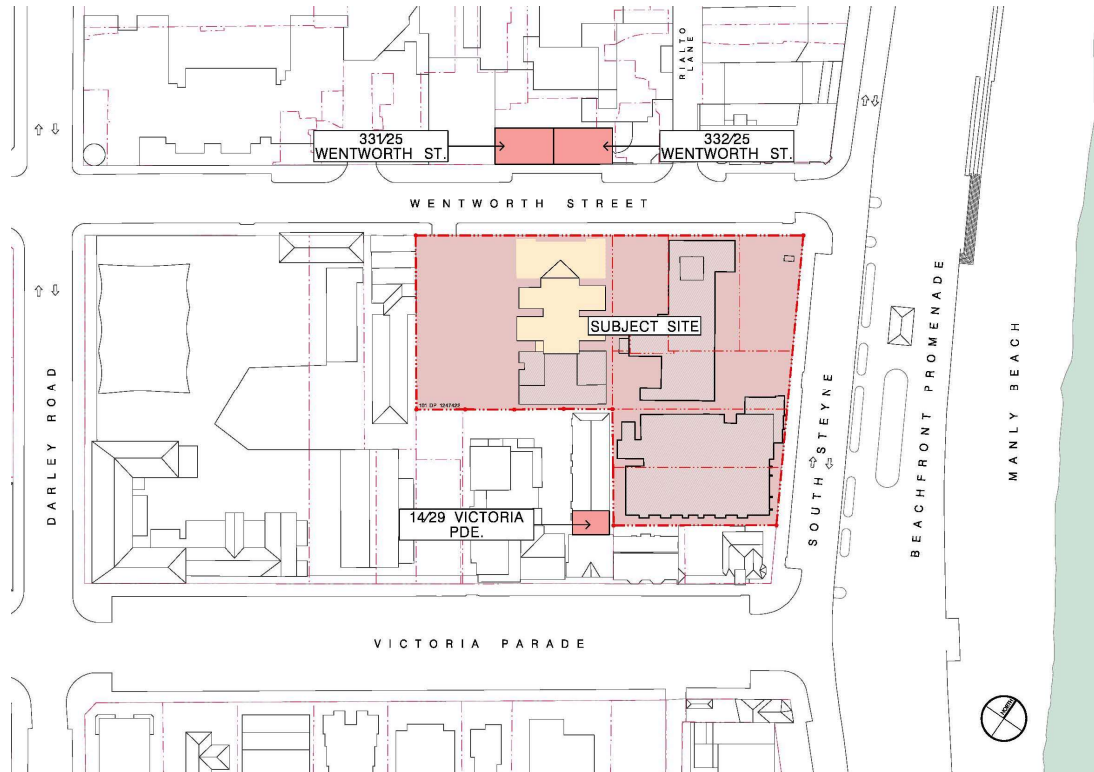


Figure 20: Locality plan noting apartments assessed.

PHOTOMONTAGE VIEW 13 – APARTMENT 331/25 WENTWORTH STREET (LIVING ROOM)



VIEW 13a: *Photomontage view of the Part 3A approved development from the Living room of Apartment 331/25 looking east.*



VIEW 13b: *Photomontage view of the proposed S75W application from the Living room of Apartment 331/25 looking east.*

VIEW 13(a & b) VISUAL ANALYSIS –APARTMENT 331/25 WENTWORTH STREET (LIVING ROOM)

<i>Viewing Situation</i>	Oblique view from living room down Wentworth street toward Manly Beach.
<i>Category of View</i>	Private View
<i>Context of viewer</i>	Living/Dining room
<i>RL of Camera</i>	13.330 AHD
<i>Date of photo</i>	26.10.2020
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Moderate impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e., the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are moderate additional visual impacts for this view when comparing the approved Part 3A design and that proposed Section 75W modification application. These view impacts are mainly to do with the loss of some sky view to the immediate south. It is considered that the amount of daylight afforded to this view is ample.</p> <p>It should be noted that there may be additional easterly beach views afforded under the eastern street facing building's undercroft space (subject to the degree of openness of the future detailed landscape design for this undercroft area).</p>



Figure 21: Key Plan of View 13 and View 14 Locations, Not to Scale.
 NOTE: Floor plan indicative only and based on similar apartment plans in the building.

PHOTOMONTAGE VIEW 14 – APARTMENT 331/25 WENTWORTH STREET (BALCONY)



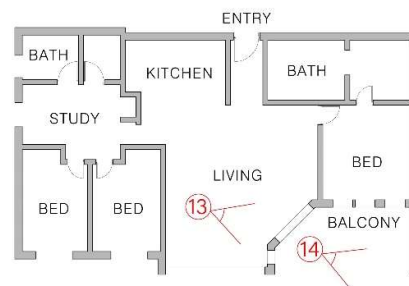
VIEW 14a: *Photomontage view of the Part 3A approved development from the Balcony of Apartment 331/25 looking east.*



VIEW 14b: *Photomontage view of the proposed S75W application from the Balcony of Apartment 331/25 looking east.*

VIEW 14(a & b) VISUAL ANALYSIS – APARTMENT 332/25 WENTWORTH STREET (BALCONY)

<i>Viewing Situation</i>	Oblique view from Balcony down Wentworth street toward Manly Beach.
<i>Category of View</i>	Private View
<i>Context of viewer</i>	Standing on Balcony
<i>RL of Camera</i>	13.290 AHD
<i>Date of photo</i>	26.10.2020
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Minor impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are minor additional visual impacts for this view when comparing the approved Part 3A design and that proposed Section 75W modification application. These view impacts are mainly related to some loss of sky view to the immediate south. It is considered that the amount of daylight afforded to this view is ample.</p> <p>It should be noted that there may be additional easterly beach views afforded under the eastern street facing building's undercroft space (subject to the degree of openness of the future detailed landscape design for this undercroft area).</p> <p>It should also be noted that the S75W modification appears to allow views onto a new public forecourt space. It is understood that this space will include soft landscaping (incl trees) as well as a variety of pedestrian activity and associated visual interest.</p>



WENTWORTH STREET

**Figure 22:** Key Plan of View 13 and View 14 Locations, Not to Scale.

NOTE: Floor plan indicative only and based on similar apartment plans in the building.

PHOTOMONTAGE VIEW 15 – APARTMENT 332/25 WENTWORTH STREET (LIVING ROOM)



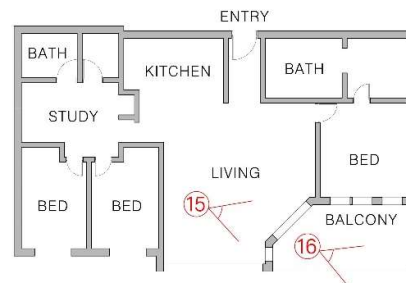
VIEW 15a: *Photomontage view of the Part 3A approved development from the Living room of Apartment 332/25 looking east.*



VIEW 15b: *Photomontage view of the proposed S75W application from the Balcony of Apartment 332/25 looking east.*

VIEW 15(a & b) VISUAL ANALYSIS – APARTMENT 332/25 WENTWORTH STREET (LIVING ROOM)

<i>Viewing Situation</i>	Oblique view from living room down Wentworth street toward Manly Beach.
<i>Category of View</i>	Private View
<i>Context of viewer</i>	Living/Dining room
<i>RL of Camera</i>	13.330 AHD
<i>Date of photo</i>	26.10.2020
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Minor impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are minor additional visual impacts for this view when comparing the approved Part 3A design and that proposed Section 75W modification application. It should be noted that there may be additional easterly beach views afforded under the eastern street facing building's undercroft space (subject to the degree of openness of the future detailed landscape design for this undercroft area).</p> <p>It should also be noted that the S75W modification appears to allow views onto a new public forecourt space. It is understood that this space will include soft landscaping (incl trees) as well as a variety of pedestrian activity and associated visual interest.</p>



WENTWORTH STREET



Figure 23: Key Plan of View 15 and View 16 Locations, Not to Scale.
NOTE: Floor plan indicative only and based on similar apartment plans in the building.

PHOTOMONTAGE VIEW 16 – APARTMENT 332/25 WENTWORTH STREET (BALCONY)



VIEW 16a: *Photomontage view of the Part 3A approved development from the Balcony of Apartment 332/25 looking east.*



VIEW 16b: *Photomontage view of the proposed S75W application from the Balcony of Apartment 332/25 looking east.*

VIEW 16(a & b) VISUAL ANALYSIS - APARTMENT 332/25 WENTWORTH STREET (BALCONY)

<i>Viewing Situation</i>	Oblique view from Balcony down Wentworth Street toward Manly Beach.
<i>Category of View</i>	Private View
<i>Context of viewer</i>	Balcony
<i>RL of Camera</i>	13.290 AHD
<i>Date of photo</i>	26.10.2020
<i>Camera type</i>	Canon EOS 7D
<i>Lens</i>	Canon EFS 15-85mm
<i>Visual Impact Rating</i>	Moderate impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application.</p> <p>There are moderate additional visual impacts for this view when comparing the approved Part 3A design and that proposed Section 75W modification application. There is some minor reduction in views of the ocean/beach front and some loss of sky view to the immediate south.</p> <p>It should also be noted that the S75W modification appears to allow views onto a new public forecourt space. It is understood that this space will include soft landscaping (incl trees) as well as a variety of pedestrian activity and associated visual interest.</p>

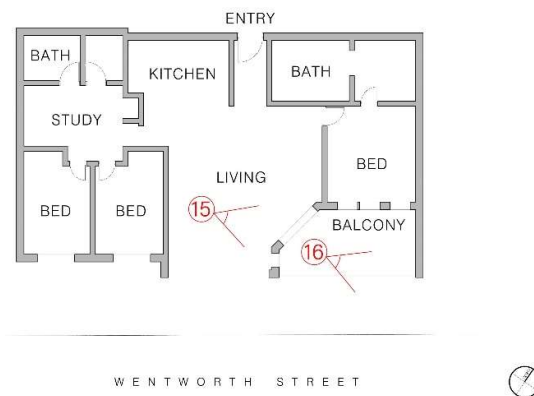
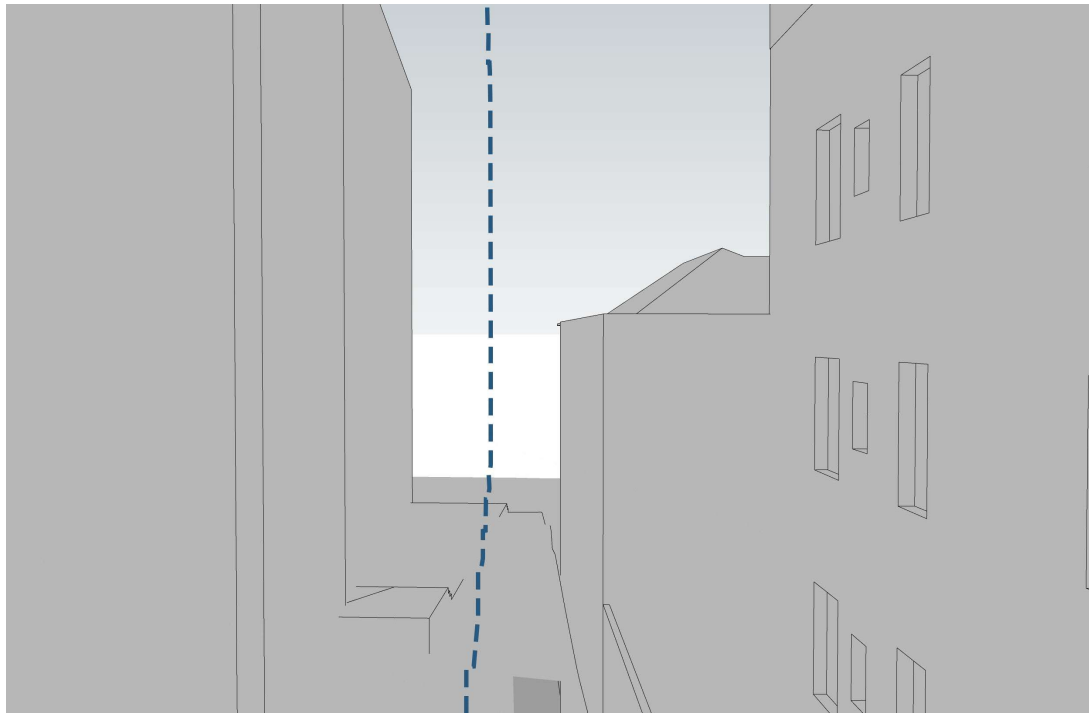


Figure 24: Key Plan of View 15 and View 16 Locations, Not to Scale.
 NOTE: Floor plan indicative only and based on similar apartment plans in the building.

MODELLED VIEW 17 – APARTMENT 5/29 VICTORIA PARADE (FROM BEDROOM WINDOW)



VIEW 17a: *Modelled view of the Part 3A approved development from the bedroom window of 5/29 looking east (existing dashed).*



VIEW 17b: *Modelled view of the proposed S75W application from the bedroom window of 5/29 looking east.*

VIEW 17(a & b) VISUAL ANALYSIS - APARTMENT 5/29 VICTORIA PDE (BEDROOM WINDOW)

<i>Viewing Situation</i>	View from bedroom window east towards Manly Beach.
<i>Category of View</i>	Private View
<i>Context of viewer</i>	Bedroom window (Level 1)
<i>RL of Camera</i>	10.520 AHD (approx. 1.6m above floor)
<i>Date of photo</i>	N/A
<i>Camera type</i>	N/A
<i>Lens</i>	N/A
<i>Visual Impact Rating</i>	Moderate impacts (negligible, minor, moderate, severe, or devastating)
<i>Comment</i>	<p>This assessment of Visual Impact has been undertaken as a comparative assessment i.e. the approved development application for the site (the Part 3A) compared to the proposed Section 75W application. Due to constraints of access into private property at the time this report was being prepared (i.e. Covid pandemic restrictions), this view study has been undertaken using computer modelling and site survey information rather than site photography from the viewpoint being studied.</p> <p>Whilst these are considered moderate additional visual impacts for this view when comparing the approved Part 3A design and that proposed Section 75W modification application, the view impacts are considered negligible when comparing the existing condition and the proposed S75W modification application. Further, as this view location is from a bedroom and this window has fixed, perforated metal screens (see photography below), the overall impacts are considered to be moderate.</p>

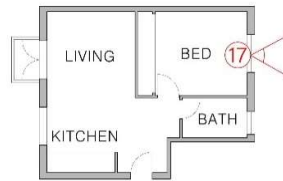


Figure 25: Key Plan of View 17 Locations, Not to Scale. NOTE: Floor plan indicative only.



Figure 26: Photography looking toward the subject window (level 1) at No 29 Victoria Pde.

Section 8.0 Conclusion

Based on the assessments detailed in this report, the visual impacts in the public domain of the proposed S75W application when compared to the approved Part 3A application is considered to be acceptable and in a number of areas, offering a superior visual outcome. The proposed Section 75W application does not appear to block any significant views to iconic landmarks or does it appear to unacceptably obscure views to Manly beach, ocean or other significant local features (when compared to the approved Part 3A design).

The proposal does include a greater level of ground plane visual openness and activation when compared to the approved Part 3A Concept Plan. This increased openness will afford a general improvement of pedestrian level view access from both Wentworth St as well as through the development to the new courtyard and to South Steyne beyond. Whilst there appears to be a reduction in building form street frontage setbacks (along Wentworth St), the resulting additional visual impacts arising from this reduced setback appear to be offset by the removal of building accommodation along South Steyne and parts of Wentworth St. In addition, the proposal includes a new public forecourt which coupled with the removed accommodation along South Steyne, appears to create a superior visual outcome when compared to the approved Part 3A proposal.

It is considered that the proposed development has achieved a reasonable balance between the protection of private views and the protection of public domain views. Based on the assessments detailed in this report, the visual impacts (from the studied private domains) of the proposed S75W application when compared to the approved Part 3A application are considered to be acceptable. It should be noted that:

1. The expectation (within the heart of Manly's town centre) that a new development is to accommodate a greater street front building setback than the predominate street setback pattern in order to maintain private wide aspect, side views of the beach & ocean is considered unreasonable and will result in a poorer urban design outcome i.e. erosion of street form continuity.
2. Private views from the studied locations still maintain (albeit reduced) views of Manly beach, ocean, and promenade (where applicable).
3. Views to a new public space (forecourt) have been offered in the Section 75W modification which we understand will include soft landscaping (incl trees) as well as a variety of pedestrian activity and its associated visual interest items.