

# Manly Council



Reference: PC EDMS 09202011-KS4U-YGNX  
Enquiries: Paul Christmas

Department of Planning and Infrastructure  
Major Projects Assessment

Email: [plan\\_comment@planning.nsw.gov.au](mailto:plan_comment@planning.nsw.gov.au)  
and [Chris.King@planning.nsw.gov.au](mailto:Chris.King@planning.nsw.gov.au)

Attention: Michael Woodland  
Director, Metropolitan & Regional Projects South

**Council Offices**  
1 Belgrave Street  
Manly NSW 2095

**Correspondence to**  
General Manager  
PO Box 82  
Manly NSW 1655

DX 9205 Manly

Telephone 02 9976 1500  
Facsimile 02 9976 1400

[www.manly.nsw.gov.au](http://www.manly.nsw.gov.au)  
[records@manly.nsw.gov.au](mailto:records@manly.nsw.gov.au)

ABN 43 662 868 065

Dear Mr Woodland,

**Re:** Environmental Assessment Exhibition – Royal Far West Expansion Concept Plan,  
South Steyne and Wentworth Street Manly. (MP10\_0159)

Please find attached Council's submission in relation to the Royal Far West Redevelopment  
Concept Plan, Application Reference MP10\_0159.

Council's submission concludes that the Concept Plan should not proceed as exhibited  
given particular regard to Council's adopted Urban Design Guidelines which are also  
attached to the submission.

If you require any further information, please contact Paul Christmas on 99761614.

Yours faithfully



**Stephen Clements**  
Deputy General Manager  
Landuse & Sustainability

Date: 4 November 2011

## CLEANER HEALTHIER HAPPIER

Manly Council Supports Smoke Free Zones

[www.smokefreecouncils.com.au](http://www.smokefreecouncils.com.au)



## **MANLY COUNCIL SUBMISSION**

TO THE DEPARTMENT OF PLANNING AND INFRASTRUCTURE,  
METROPOLITAN AND REGIONAL PROJECTS SOUTH  
IN RESPONSE TO THE ENVIRONMENTAL ASSESSMENT EXHIBITION SUBJECT:  
**ROYAL FAR WEST EXPANSION CONCEPT PLAN,**  
SOUTH STYNE AND WENTWORTH STREET MANLY (MP10\_0159)

DATE: OCTOBER 2010

## **INTRODUCTION**

This submission provides Manly Council's comments and issues on the exhibition of the Major Project Application made by Royal Far West (the Proponent) at the above address lodged pursuant to Part 3A of the Environmental Planning and Assessment Act 1979. Council's earlier submission in response to the Director General's Requirements on 20 December 2010 and the consultations with the Proponent in May 2011 are noted. This submission is significantly informed by Council's Urban Design Guidelines adopted on 10 October 2011 for the urban block located within Darley Road, South Steyne, Victoria Parade and Wentworth Street, Manly and is attached to this submission.

### **Manly Urban Design Guidelines (2011)**

On 14 February 2011 Council resolved that design control guidelines be prepared for the site bounded by Wentworth St, Darley Rd, Victoria Parade and South Steyne to address the significant access, parking, urban design, landscape and environmental planning issues on the site. The Manly Urban Design Guidelines (the 'Guidelines') were prepared and exhibited in response to Council's resolution [PS90/11] of 1 August 2011 as follows:

1. *Council resolves to exhibit the Draft Urban Design Framework for the urban block located within Darley Road, South Steyne, Victoria Parade and Wentworth Street, Manly for public consultation for 28 days.*
2. *Council strengthens the through site pedestrian link requirements;*
3. *A floor space ratio be set so that the envelope is not fully saturated, and*
4. *Consideration of desirable locations for motor vehicular access to basement parking be addressed.*

The Guidelines were exhibited for 28 days from 8 August 2011 to 5 September 2011 for public comment to ensure that the re-development of the Royal Far West site is of an acceptable scale, comparable to the surrounding area. Submissions were received and considered by Council in the adoption of the Guidelines. A number of issues arising in these earlier submissions are further addressed in this submission.

On 10 October 2011 Council adopted the Guidelines and further resolved to use the Guidelines in the Council's submission on the exhibition of the Major Project ('Part 3A development') being undertaken by the Department of Planning and Infrastructure. This submission raises issues and concerns with the proposed Major Project development with particular regard to Council's adopted guidelines for the site and other local plans and policies.

## ISSUES

### Height, Bulk and Scale

The Royal Far West Concept Plan's Indicative Building Envelope significantly exceeds Council's 'Wire Frame maximum envelope control', Manly Guidelines 2011.

The Proponent's Planning Consultants, Urbis have made earlier submissions on Council's Guidelines during the exhibition period and were critical of 'wire frame' envelope controls being "a dated and discredited stepping building height approach which results in an inefficient and unsightly 'wedding cake' effect for no apparent planning purpose". In this regard Council affirms its 'wire frame' maximum building envelope control, as a means of defining "a generous three dimensional space within which quality residential design can occur". (Part 1 – Building Envelopes, Residential Flat Design Code under SEPP 65 - Design Quality of Residential Flat Development). The drafting of Council's adopted Guidelines' 'wire frame' envelope involves considered stepping of height and modulation which is justified given both the size of the development site and in recognising a maximum allowable height of building at specific and purposeful locations on the site. Various height limits at these 'stepped' locations identify where it is considered that development must be controlled to protect the amenity of adjoining development, streetscape character and landscape and architectural heritage.

The Concept Plan's proposed Royal Far West Accommodation Building (Building 'A') indicates a maximum 26.5m height and setback of 7.4m to Wentworth Street. However, the Manly Guidelines' Indicative Building Envelope recommend building heights in this location of no more than 12m, 14m & 16m and minimum setbacks respectively of some 16m, 20m and 28m from Wentworth Street. Council considers that the height and scale of development in this location should be significantly reduced to within the Council's Guideline (Urban Design Framework diagram) to ensure the development reflects the scale of adjacent buildings and so as not to overshadow/overwhelm the public school playgrounds to the west. Council's Guidelines also identify important urban design opportunities for public plaza space in this location in the vicinity of Rialto Plaza (across Wentworth Street) to create a public realm focus point to the street block that will tie back to The Corso and the greater Manly Town Centre (see also 'Requirements for Pedestrian Links and Public Open Space' below).

The Concept Plan's proposed Hotel Building (Building 'C') is 29.8m high for a length of 55m compared to Council's Guidelines which recommends a maximum 18m height for buildings of similar length in this location. The Guidelines further recommend a height of 25m may be achieved in this location but within a much smaller footprint (of some 35m length) than is indicated on the Concept Plan. In relation to the Concept Plan's Residential Building (Building 'E'), proposed heights of 13.8m and 17m are indicated compared to 12m and 15m in the Manly Guidelines. Council's Guidelines particularly in these locations are considered to more appropriately correspond to controls and/or existing buildings. These Guidelines are established with regard to the local urban context, and to local policy and plans including the Wentworth Street Urban Design Controls in 1997 and the Business Zone DCP 1989.

One further and significant observation regarding the proposed site layout is the amount of under used space between buildings, with the effect of increasing the overall height of buildings, inactive building facades, back lanes and spaces. It is requested that the proposal re-consider the site layout, with consideration to the surrounding street pattern in the Manly CBD and maximise the public amenity, active frontages and usable safe spaces for town centre residents, visitors and business.

### Requirements for Pedestrian Links and Public Open Space

The inclusion of through site pedestrian links are an important requirement of the Manly Guidelines as indicated on the 'Urban Design Framework diagram' and important in the context of existing connections, public spaces and plazas in the Manly Town Centre. Manly Council request that the Concept Plan be amended to incorporate appropriate pedestrian links in accordance with Guidelines and integrate with other public space elements further detailed in this submission following.

### **Public courtyard opposite Rialto Square, Wentworth Street**

Manly's 2011 Guidelines propose a courtyard on that part of the site opposite Rialto Square from Wentworth Street. This space is to include 'public' and 'semi public' components and is an important area in urban design terms given the context and scale of the development proposed. There is no public courtyard in the exhibited Concept Plan and an 8m setback indicated on plans in this location, comprising a nominal landscape edge which is not considered to go any way towards providing a space of public scale. In this regard amended Concept Plans are requested by Council in this submission incorporating the activation of public courtyard space within the site on the southern side of Wentworth Street opposite Rialto Square.

The Proponents' (Urbis) earlier submission on Council's Guidelines have considered that the public courtyard requirement to be of an 'unwarranted size' which "severs connection to the street and will undermine the quality of the built form and interface here". In this regard the proposed size of the courtyard has been determined by Council with detailed consideration of site constraints and opportunities at a width and alignment to complement and enhance the existing Rialto Square space and also having regard to the heritage significance of Drummond House adjoining the courtyard. The requirement of the Guidelines for a public domain space in this location are not considered excessive or unreasonable having regard to the scale of the development overall. Given a proposed 8 storey height near this part of the development and fronting this space it is considered that a public space of any consequence here would need to be deeper than 8m to act as a forecourt of appropriate scale. The setback and treatment in this strategic location is considered to only go towards softening the impression of a building that is considered excessive for this site and context.

The Royal Far West Concept Plans are substantially over and above Councils' Guidelines detailed in this submission and the provision of some contribution back to the public domain in the form of a public courtyard opposite Rialto Square identified in the Manly 2011 Guidelines is considered reasonable. There is an opportunity to create an important strategic public space here of a quality and scale comparable to Rialto Square not realized in the current Concept Plan.

### **Heritage**

Council's Heritage Officer has reviewed the Proponents' exhibited Conservation Management Plan and is concerned that the proposed concept plan adversely impacts on the heritage listed items within the site and in the vicinity and does not meet the following policies of the Conservation Management Plan. (It should be noted that the levels of the existing buildings submitted by the applicants, dwg CP-04, relate to the highest points on the buildings and not to the overall heights of the existing buildings)

#### **Policy 6 - Conservation Management Plan, Urbis, May 2011**

*'Changes at the Royal Far West site should consider the significance of and not adversely impact on other heritage items in the vicinity'.*

This policy should include the *'heritage items within the site'*



Even though the applicants' identified the character of the area as '*fine urban grain of the surrounding streets, laneways and active retail areas*' they have proposed two buildings Building A and Building C, which challenge the heritage listed items within the site and in the vicinity in terms of height and bulk particularly: Drummond House and 12 Wentworth Street; 31 Victoria Parade and 29 Victoria Parade; and Terraces at 15 & 16 South Steyne.

Drummond House and 12 Wentworth Street: Building A is more than 10mts higher than the two adjacent heritage buildings, Drummond House and 12 Wentworth Street. Although Building 'A' is set back from the street frontage it is considered that the proposed height does not respect the scale of the listed buildings. Further consideration should be given to the adopted Urban Design Guidelines for the site, which provides opportunities for public and semi public spaces adjacent to the listed buildings while providing a building, which does not challenge the scale of 12 Wentworth Street and Drummond House.

31 Victoria Parade and 29 Victoria Parade: Similarly the proposed hotel building, Building C, is more than 12mts higher than the approved level to 31 Victoria Parade, and more than 15mts higher than 29 Victoria Parade, both of which are heritage listed items. Although Building C is set behind these two buildings the impact of Building C will be clearly visible and is unacceptable

Terraces at 15 & 16 South Steyne: The significance of the terraces is challenged by the contrast between the two storey listed terraces and the adjacent overpowering nine storey hotel building. Consideration needs to be given to not only to direct views to the listed item but also to the oblique views from South Steyne.

Policy 15 - Conservation Management Plan, Urbis, May 2011

*The Terraces should retain its heritage curtilage and any new works should be setback from the building to allow visibility of its elevations and to retain the building's landmark qualities. The 3-D form of this building should be read from the street. and*

Policy 17 - Conservation Management Plan, Urbis, May 2011

*There should not be any connections added from the Terraces to any existing or new buildings on the site*

A connection to Building E and Building C is proposed to the heritage listed terraces. It is recommended that the connection be deleted and the proposal amended to comply with Policy 15 and 17 to minimize any additional impact on the listed item

Policy 23- Conservation Management Plan, Urbis, May 2011

*The mass, scale and height of any new development on the Royal Far West site should consider the character and relationship to the mass, scale and height of heritage buildings on the site and in the vicinity*

The heritage buildings on the site are two and three storeys in height with relatively small footprints. The heritage buildings in the vicinity of the site are a maximum of five storeys in height also with relatively small footprints. Nevertheless the proposed buildings range from five to nine storeys in height with very large footprints. Clearly the character of the heritage buildings have not been considered and the mass, scale and heights of the proposed buildings on the Royal Far West do not reflect or compliment the building forms of the heritage buildings on the site and in the vicinity

## **Social Impacts**

The exhibited Environmental Assessment does not include a Social Impact Assessment and Manly Council has requested that the Department seek to obtain such a report and provide this assessment on the exhibition website.

Submissions received by Council from its Community Precincts are concerned about the impact of introducing effective 24 hour alcohol service via the hotel next to the children's area. In this regard Council requests consideration of Manly Development Control Plan for Late Night Venues (Late Night Venues DCP) which promotes Manly Town Centre as a safe place for enjoyment of the wider community, minimising disturbances to the public, late at night.

Other concerns raised in Council's Community Precinct comments consider that the new development represent a loss of amenity for children attending the site which appear to 'have lost out – relegated from beach view to buried within the complex with no view and no sunlight' including the relocation of the children's play area. In this regard please see comments on shadow effects following in this submission.

Concern is also raised regards the likely need for arrangements to reaccommodate current residents of Elderslie House and social and moral obligation to provide affordable housing in this central location.

#### **Impact on Manly Village Public School**

Site Analysis Plan (Dwg.CP-04D) does not mention or refer to the Manly Village Public School. The failure to recognize this important adjoining neighbour on the site analysis plan as well as other development in the vicinity appears to demonstrate a lack of appropriate consideration of likely environmental impact. In particular, an 8 storey building in the south western corner of the site abutting its eastern boundary is considered likely to have a detrimental impact on the amenity of this primary school. The Royal Far West building that presently sits on this part of the site is 6 stories high, with a flat roof and provides approx 10-15m setback to its rear boundary providing separation to the school grounds in this location where overlooking and overshadowing would be most detrimental. (see below).

#### **Shadow Effects**

The Manly Guidelines – Urban Design Framework seek to establish a generous building mass including building envelope height controls in certain locations to ensure solar access is appropriately maintained.

The Concept Design is not considered to adequately consider shadow impacts at the south east and south west elevations of the proposed Hotel building. While the Concept Plan indicates a height of 30m at this location (see 'Height and Scale' above) the Council's Guidelines recommend a stepping of the building mass from 10m to 18m to 25m, to more appropriately address shadow effects.

Similarly, the Guidelines – Urban Design Framework seek to control shadow effects of future building bulk on the neighboring school and its grounds. In particular the Council Guideline seeks to ensure development at the southern corner of the Hospital building is not so large that it overshadows or overwhelms the public school playgrounds.

The amount of overshadowing of the school grounds has not been conclusively shown in the Concept Plans. The shadows documented and drawn at certain times of the day are cropped out of the drawing frame of the shadow diagrams (see dwg CP-20D) and the extent of shadow or the real impact of the shadow not shown. Having regard for the likely impact on the amenity of the school with already limited areas of open space, Council requests

more detailed assessment of overshadowing between 9am -3pm in mid- winter, drawn at an hourly basis at its full extent without cropping as on the current drawings. More detailed shadow assessment would provide opportunity for further consideration and comment on likely impacts. Based on the proposed height of buildings (see 'Height and Scale' above) and the assessment as exhibited, Council request amendments to the Concept Plans to minimise the likely shadow effects.

The exhibited shadow diagrams indicate impact of overshadowing to neighboring residential units. However assessment of the impact based on local planning criteria is lacking. In this regards Council's Residential DCP 2007 and Energy Efficiency DCP seek to limit the impact of shadows effects to living areas particularly noting standards for a minimum number of hours of solar access to windows at mid-winter and depending of the orientation of the overshadowed windows in the Residential DCP. Detailed assessment of shadow effects against local DCP controls is requested and compliance is sought in Council's Submission.

Council's assessment indicates increased and unacceptable shadow impacts. Manly Council request more complete shadow studies, especially re the children's area, Manly Village School, Residential buildings & the Oceanfront.

### **Traffic Issues**

The location of desirable locations for motor vehicular access to basement parking is detailed on the 'Urban Design Framework diagram'. The implications for parking and ingress and egress for the site for vehicles and pedestrians is not considered to be sufficiently addressed in the Environmental Assessment. In this regard the proposed vehicular access point, in conjunction with the intersection of Wentworth Street and Rialto Lane (including ingress and egress from the Public Car Park and well as numerous delivery movements) is not adequately assessed including the likely need for traffic improvement measures. Furthermore the environmental capacity of Wentworth Street need also be addressed noting in particular various noise sensitive land uses including residential development along the street.

### **Conclusion**

Council's submission on the exhibition of the Major Project ('Part 3A development') considers the development should not be approved as exhibited by the Department of Planning and Infrastructure given particular regard to Council's adopted Urban Design Guidelines.

The Concept Plan indicates significantly more additional bulk and scale than approved in Council's Guidelines. For example, the proposed Hotel component of the development at 30m above natural ground is taller by 5m and twice the footprint size at that height, than the Council's Urban Design Guidelines would allow. Departures from the maximum building envelopes recommended in the Council's Guidelines and raised in this submission are considered to result in a major impact on the amenity of surrounding residents than would otherwise have been experienced in a scheme that conforms with the Council's Guidelines.

The exhibited environmental assessment is not considered to provide sufficiently detailed considerations to justify support of the Concept Plans at this stage and Council's submission request more detailed and/or amended plans particularly with regards to appropriate urban design opportunities including public space and pedestrians linkages (in accordance with in Council's Guidelines) as well as social impact, shadow impacts and traffic.

### **ATTACHMENTS**



<b>AT-1</b>	<b>Draft Urban Design Guidelines for the Urban block located within Darley Road, South Steyne, Victoria Parade and Wentworth Street, Manly</b>	<b>23</b>
		<b>Pages</b>



DA Working Group of the Heritage Committee  
3 November 2011

12-22 Wentworth Site, 19-21 South Steyne (Royal Far West Site)

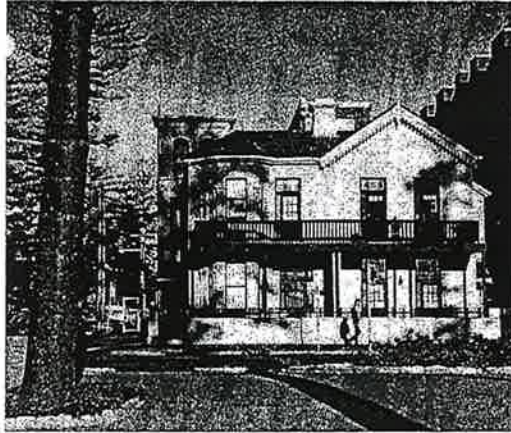
1. The proponent is to be commended on the proposed retention of Drummond House and Tranby / Latrobe, the listed Heritage items.
2. The proponent should ensure the full restoration of both properties. The detailed restoration of the Tranby/ La Trobe pair (c.1883) is essential, in particular the reinstatement of the tower roof, roof details and verandahs. (see attached photos and plans for 15 South Steyne).
3. It is vital that the South Steyne frontage has a strong horizontal emphasis and low scale to respect and reinforce the horizontal character of the beachfront and historic South Steyne promenade.
4. We are concerned the development will increase significantly the number of cars within the Manly CBD, in contradiction of Council's current strategy to reduce car dependence and vehicle movements within central Manly.
5. We are pleased that the historic Royal Far West mission to underprivileged rural children is to be retained on part of its original site, and that these functions are to be located adjacent to the historic Manly Village Public School with which it has enjoyed close links over many decades.

MANLY COUNCIL  
HERITAGE COMMITTEE





South Steyne no 15, Tranby Nursing Home



On 22 April 1895, a meeting was held in the Manly Council Chambers, then in the former Ivanhoe Hotel building, to discuss the growing needs of the 'indigent sick of Manly and district'.<sup>1</sup> In 1894 Nurse Lucy Bonnar had opened a Patients' and Nurses' Home, *Tranby*, at South Steyne. Needy cases were sometimes treated there free of charge. The two local doctors offered to give their services in an honorary capacity if a fund were established to ensure that a room was reserved at Nurse Bonnar's Home for these unfortunate people.<sup>2</sup>

Tranby was on the corner of Victoria Parade and South Steyne, on the Corso side. It had been built originally with its neighbor, Latrobe, as a pair of semi-detached houses for Michael Metcalfe by Cyril and Arthur Blacket [sons of eminent architect Edmund Blacket] circa 1883. George Champion's monograph *Manly Beach and the Blacket Connection*, includes a reproduction of the plans of the M Metcalfe houses, from the ones held by the Mitchell Library, (Blacket Plans D207-1 f.49, f.50, f.70.).

*Sands' Directories* list Nurse Bonnar at Tranby from 1895 until 1901; it is not clear whether the building is mentioned in *Sands'* prior to 1895. In 1902, a Nurse Graham is listed, and the building has changed its name to 'Omrah' Nursing Home (Nurse Graham had previously run Omrah from premises in George Street, Manly). From 1903-1906, Omrah is run by Nurses Latreille and Thurlow. However, it then faced the nuisance of being adjacent to the Water Chute Amusement Grounds, and may have seen a falling-off in business. In 1907, *Sands'* no longer lists a nursing home on the site, and the building may have been renamed 'Colona'. (Nurse Latreille re-appears at St Ronan's Private Hospital on North Steyne.)

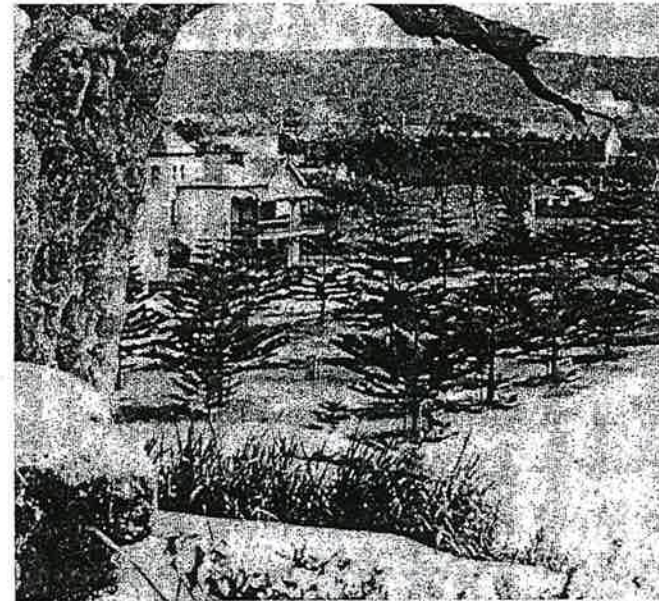
Later, in 1974, after restoration, the building became The Far West Parent and Child Units, part of the Royal Far West Hospital.

<sup>1</sup> Curby, op cit, p14.

<sup>2</sup> Loc cit.



Manly Library Local Studies



Tranby and Latrobe, c1890. See Dillon, J, *Manly Old and New*, p68, source of photo not given.



15 South Steyne, 2006

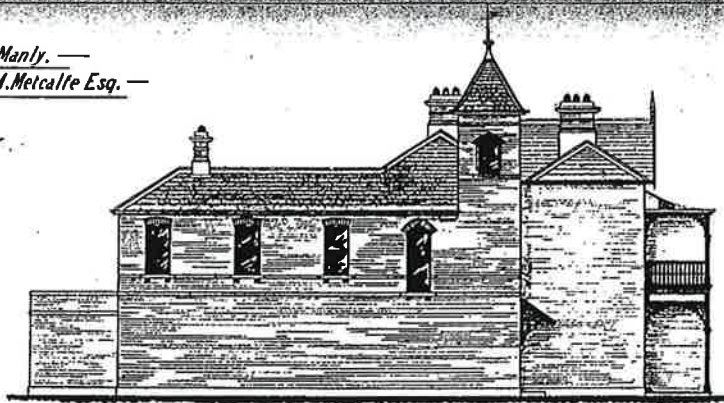




— Houses, Manly. —  
— for M. Metcalfe Esq. —

2

24



— Side Elevation —



— Front Elevation —



— Back Elevation —

— 1/8" Scale —

*E. T. Blacket*  
*Architect*  
*W. H. Blacket*

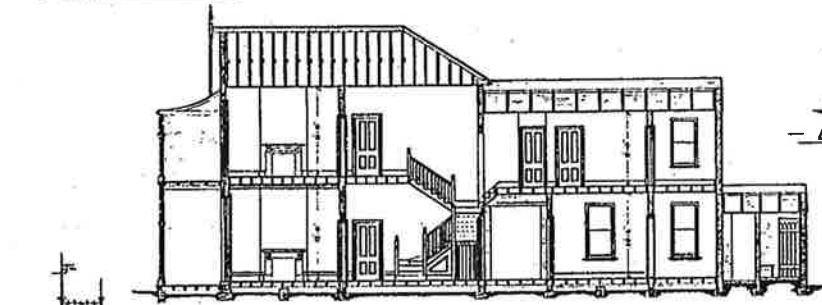


E.T. Blacket - Plans D207-1 f.50



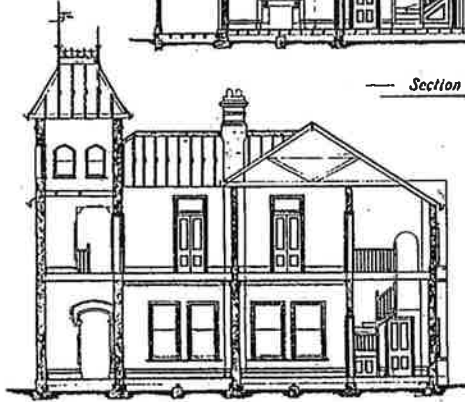
— Houses . Manly . —  
— for M. Metcalfe Esq. —

3



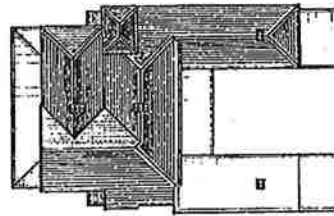
— Entrance Gate and Fence —  
— 1/4" Scale —

— Section AA —



— Section BB —

— 1/8" Scale —



— Roof Plan —  
— 1/4" Scale —

*Handwritten signature and notes.*

