Revision
June 2022 **01.**

SEPP 65 DESIGN VERIFICATION STATEMENT

Document Number: DA-STA-0001

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 Development Application ('DA') submitted to the Northern Beaches Council. This application relates to the redevelopment of the site at 14-22 Wentworth St & 19-21 South Steyne, Manly ('the Site').

Background & site description

The overall site area is approximately 6,398 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 DA represents the culmination of a plan to consolidate and reinvigorate Royal Far West's home in Manly.

The site of the proposed development can be identified as Lot 101 DP1247422 and Lot 100 DP1276056.

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. **Building A** – Minor alteration and addition to the existing Centre for Country Kids.
3. **Building B** – Alteration and addition to the existing Drummond House. This building will comprise of short stay guest accommodation and associated facilities for Royal Far West.
4. **Building C** – Construction of a mixed-use building which includes 5 storeys of residential apartments. This building also includes 3 levels of commercial accommodation on the lower levels.
5. **Building D** – Construction of a 5-storey residential apartment block which is aligned with the site's eastern boundary along South Steyne. This building comprises of 4 storeys of residential apartments surmounting a landscaped largely open ground level with some retail spaces.
6. **Basements** – Construction of a two-level basement for vehicle parking, services, and storage.
7. **Public areas** – A new publicly accessible forecourt space with generous amounts of soft landscaping.

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

1. A mixture of one-bed, two-bed, and three-bed apartments providing a total of 58 residential units.
2. Commercial tenancies of approximately 2,807sqm.
3. Refurbishment, alterations, and additions to the existing Drummond House which will include 26 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 231 parking positions.

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

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').
5. Concept approval Part 3A (NSW EP&A Act) development, approval 28/04/2013, application # MP10_0159 ('the Part 3A').
6. Concept approval (modifying), Section 75W application # MP 10_0159 MOD 1 ('the S75W').

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: DA 100-120, DA 125-128, DA 135-137, DA 145-149, DA 165, DA 170, DA 180-181 & DA 190 (all drawings labelled 'Issue 01' dated 10.06.2022). Further, both Mr Candalepas & Mr Murcutt are registered as an Architect in accordance with the NSW Architects Act 2003.

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').

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 2: *Photography of the site currently viewed from the North East.*

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. To the east is the roadway South Steyne and then the beach promenade and Manly beach itself. To the south of the site (on Victoria Parade) is a range of predominantly 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 with the existing and future desired character of the area. Further the proposal is considered to be consistent with the concept masterplan approval for the site (as modified by the approved S75W modification). The project has loosely been divided into 4 separate building forms, each 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 these buildings. 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 blocks, 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 publicly accessible 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 makes use of 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 (when compared to the Part 3A concept plan) has allowed for the removal of building accommodation at the base of Building D and along Wentworth St. This provides for significant amounts of openness to the ground plane that creates space and amenity to the public domain. This amendment was approved in the Section 75W modification application.

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 adjusting the need to accommodate more people (both to work and reside) such that a positive and sustainable built environment can be achieved. The proposed development seeks to strike this balance, making a strong and public gesture with its high degree of ground floor openness whist also carefully locating its accommodation in the most compatible areas of the site.

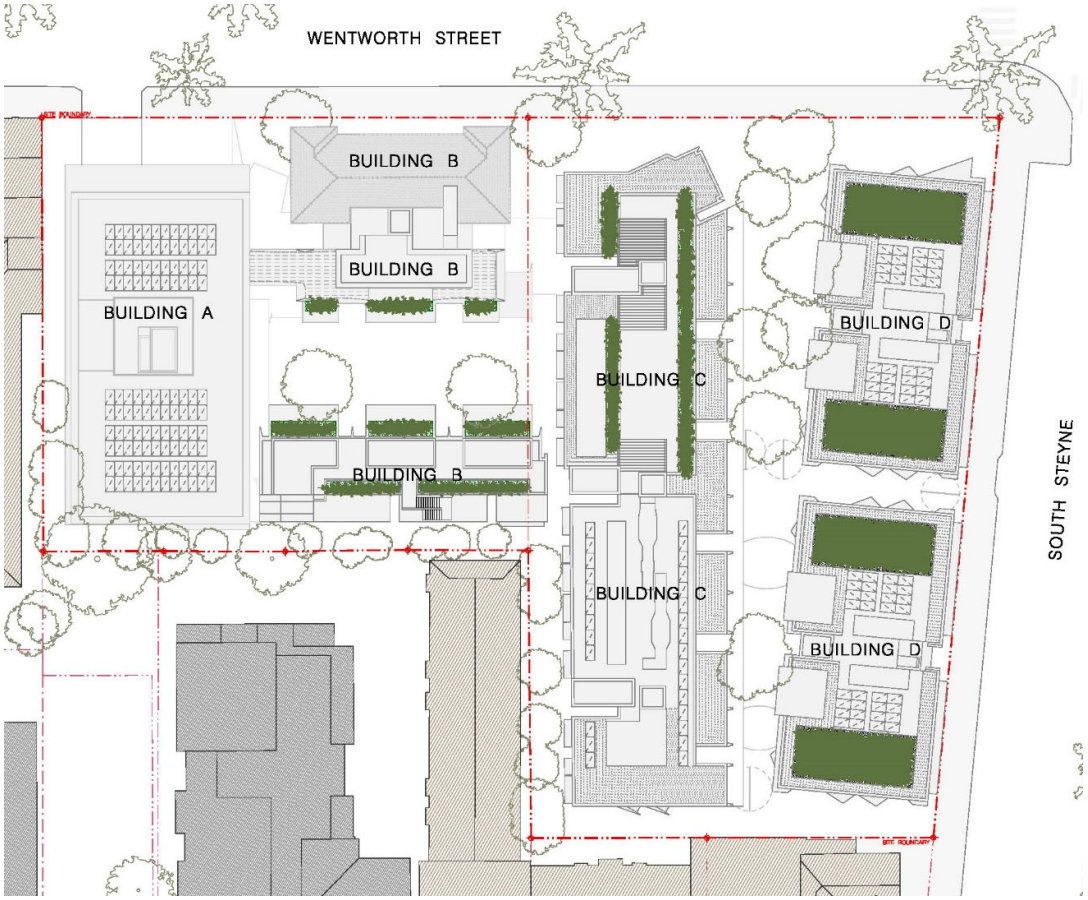


Figure 3: *Site Plan of the proposed development.*

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.'

The proposed new buildings' 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 relevant development controls applying to the site. This detailed development application also builds on the earlier Part 3A concept masterplan approval as well as the later Section 75W modifying approval for the site.

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 uses a variety of design strategies to 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), 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 publicly accessible forecourt which further reduces the proposal's visual bulk, creating a suitable scale and inviting public space with good views of the ocean through the open under croft of Building D as well as a variety of uses to activate this space throughout the day.

Figure 4: *Rendered perspective view looking south from Wentworth St towards the proposed development.*

Views from Private Domains.

Below is a brief comparison of building form (detailed development application and approved Section 75W envelope) from several selected private domain viewpoints. These viewpoints were selected as they were earlier assessed as part of the Section 75W Visual Impact Assessment report. These views allow for a comparison of the proposed detailed development application building forms overlaid with the Section 75W approved building envelope. These views clearly show that the proposed detailed development application building forms are closely aligned to the approved Section 75W building envelope.

Figure 5: *Photomontage view of the proposed development application building form viewed from the Balcony of Apartment 331/25 looking east (approved Section 75W envelope dashed blue).*

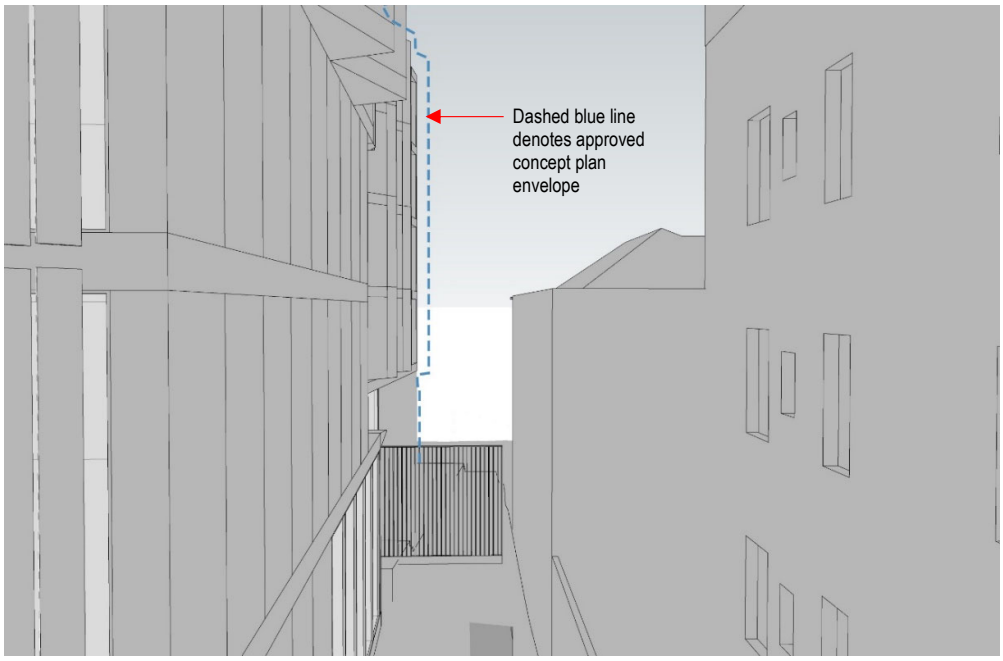


Figure 6: *Computer modelled view of the proposed development application building form viewed from the bedroom of Apartment 5/29 Victoria Pde looking east (approved Section 75W envelope dashed blue).*

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 (Section 75W) in both form and density. The amenity of the residential apartments proposed is high with many apartment attributes exceeding 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 designed 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 onsite parking to accommodate these apartments' requirements (along with the other associated uses on the site).

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

Figure 7: *North Elevation showing open ground plane connection to the beach front.*

Figure 8: *Visualisation of proposed development viewed from Manly Beach.*

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 proposed development exceeds the targets set out in the NSW Building & Sustainability Index (BASIX) and the ADG and commits to the achieving a 5 Greenstar equivalent rating across the project (refer to the accompanying project Sustainability Report). The project includes 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, daylight penetration and prevailing winds.
2. Cross ventilation to approx. 79% residential apartments with significant amounts of apartments enjoying a multiple aspect. Non-dual aspect units are provided with significant portions of façade and associated openings to achieve high levels of ventilation and daylighting etc.
3. Extensive use of sun-screening to most building openings with generous north-east 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 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 and decorative concrete, façade profiled tiling, metal trims, sandstone and dry pressed brickwork (including recycled brickwork from the site). 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 5 star Greenstar development targets – refer to the accompanying project Sustainability Report.

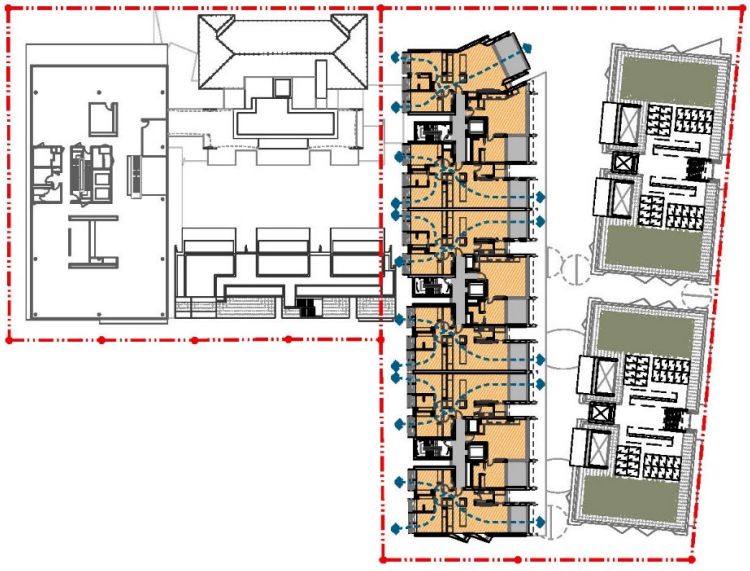


Figure 9: *Part plan showing cross ventilation paths through residential apartments on a typical level (Building C).*

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 space 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 native trees (e.g. *Banksias, water gums etc*). Given the proposed trees' mature 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 design approach of referencing metaphorically the coastal environment of sand dune and coastal ravine. Elements from this landscape (of its place) have been distilled into the project's landscape design in a number of ways. Some of these include the predominance of sandstone as both a paving material as well as larger seating objects or block under buildings and around planting (to form shelter and protection). The paving design for the ground floor sees subtle undulations, shifting around plants and landscape elements to form more naturalistic forms (rather than a stronger linear edge of more urban projects). Plant selection also strongly references this coastal locale with low hardy salt tolerant plants interspersed with seaside suitable tree stands. The buildings with their masonry palette along with the long courtyard's proportion can be also viewed as part of this coastal reference; a stone gully or ravine opening to the ocean.

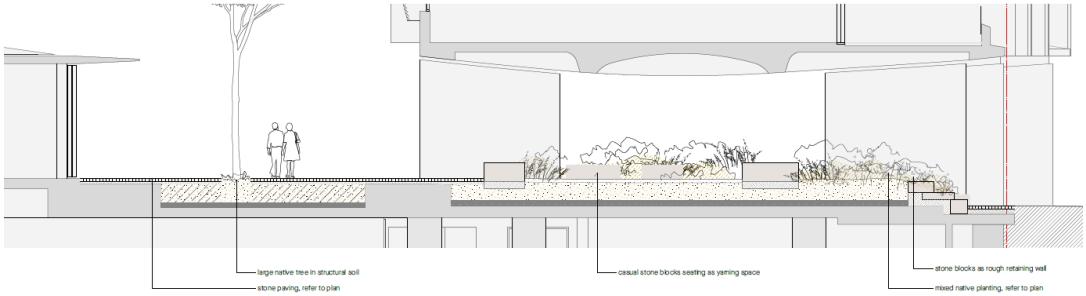


Figure 10: *Extract from the Landscape Architect's drawings illustrating a part of the proposed forecourt space and under Building D. Source JILA.*

The project includes many landscaped (and active) rooftop areas 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. Included in these active areas are a variety of gathering spaces, shading devices and communal use facilities such as BBQs. These areas have also been provided with 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 and buffering to increase visual privacy.

Refer to the accompanying Landscape Architect's documentation for further details.

Figure 11: *Extract from the Landscape Architect's drawings illustrating the high-quality landscaping for the proposed new publicly accessible forecourt space. Source JILA.*

Figure 12: *Example photography of the selected primary courtyard tree species selection. Source JILA.*

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 apartments within the proposed development have 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 apartment layouts, useful and pleasant private outdoor space as well as accessibility to all.

The overall buildings' 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 include a publicly accessible forecourt space. This space acts as important buffer for the residential components of the project, helping to mediate privacy as well as allowing for natural ventilation (100% of the units in Building D are naturally cross ventilated and have a dual aspect). Also a significant amount of units in Building C are dual aspect and are naturally cross ventilated. Single aspect units are large and have a generous amount of façade exposure to allow for significant natural ventilation.

Visual privacy has been achieved both with building setbacks as well as more active elements such as architectural screens or sculpted window openings to direct views and prevent unwanted visual connections across the site and to neighbours. This ensures a high-quality residential development whilst also being mindful of the project's inner city, beach side locale. These screening devices are such that direct views into adjacent apartments or neighbours are prevented whilst they still allow for either a sky aspect or views down into the courtyard. Further these screening devices are proposed for secondary window openings such as kitchen splashback windows and the like.

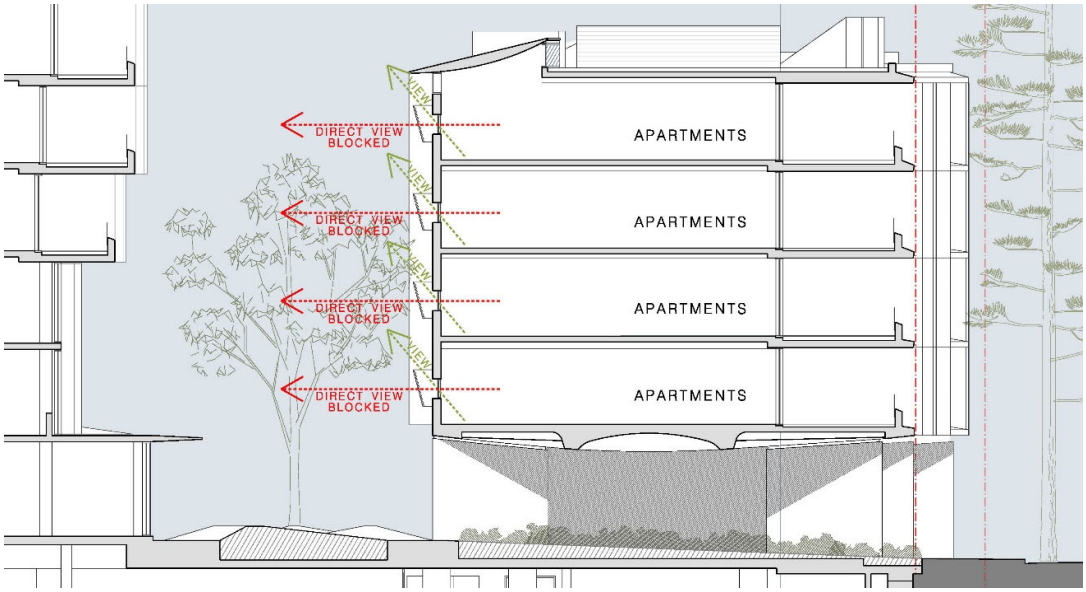


Figure 13: *Sectional diagram showing window treatments preventing unwanted visual privacy impacts (from Kitchen windows).*

The project's façade design makes use of vertical fins to create deep recesses for inset balconies to enhance resident sense of protection whilst also allowing for a good amount of façade relief and expression. These elements have been 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. The result is an articulated holistic composition which carefully considers the amenity offered to each apartment occupant.

The project 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.

Apartment storage exceeds ADG requirements due in part to the to the generous apartment area sizes and the efficient internal layout. The development is considered to positively influence internal and external amenity for residents and neighbours.

Figure 14: *Visualisation of proposed development viewed from the eastern end of Wentworth Street.*

Figure 15: *East elevation of the project (showing façade of Building D in the foreground).*

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. Refer to the project Crime Risk and Prevention Through Environmental Design (CPTED) report for further details.

Key safety and security design strategies used in the proposal are as follows:

1. Residential entry points and circulation areas are clearly identified and securable.
2. A separation of residential and other building uses, entries etc. This is aimed to avoid incompatible user groups mixing.
3. 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).
4. 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.
5. 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.
6. 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).

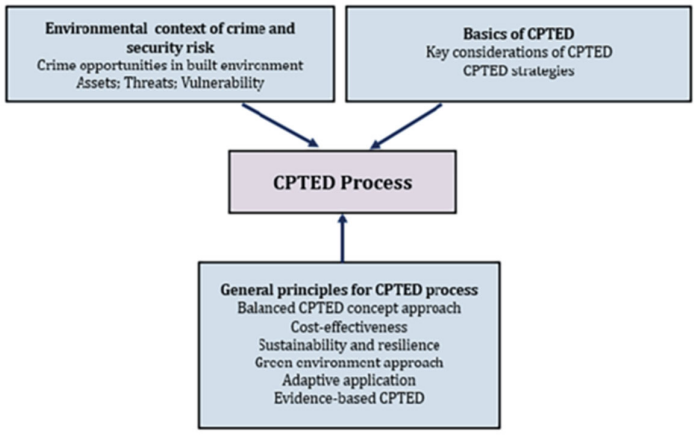


Figure 16: *Framework of CPTED for crime prevention and security*

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.'

Apartment planning has been carefully considered throughout the development to ensure layouts remain universal and flexible and able to provide for a range of occupants. Solar access has played a significant role, with living rooms generally located on the façade adjoining the inset balconies. Internal apartment areas and room sizes have been carefully considered with areas generally exceeding ADG requirements. The development includes a range of apartment sizes to cater for different user groups. These arrangements also include 1, 2, and 3 bedroom apartments.

In accordance with the MDCP guidelines, 15 Adaptable units (representing over 25% of the units) have been provided within the development. In addition to these Adaptable units, at least 20% of the residential apartments will achieve a Silver level of universal design features as per Livable Housing Australia's Livable Housing Design Guidelines.

In general, the units have been designed with open plan living areas adjoining kitchens to maximise the amenity throughout the living and dining areas. Storage and or laundries have been conveniently located near to the entry and adjacent to the open plan living area, with supplementary storage located within the basement levels. Windows have been provided to direct the views such that visual privacy of the development and neighbours is respected.

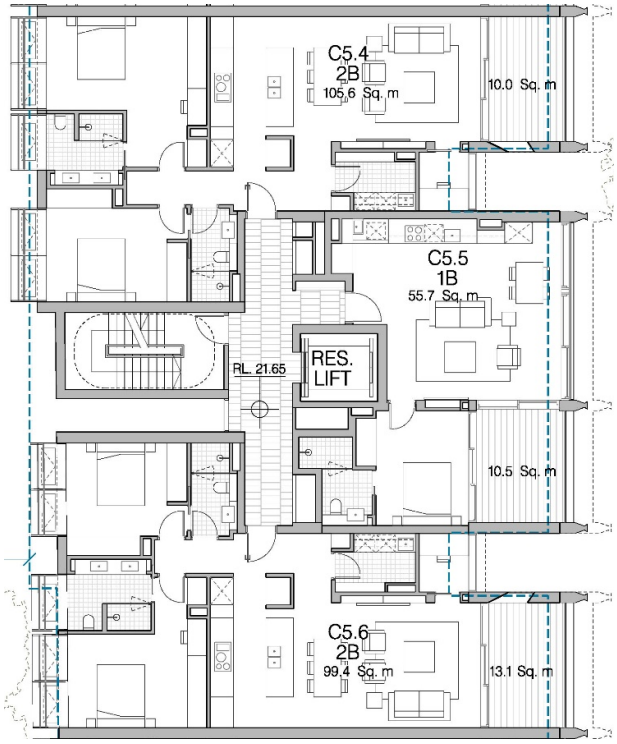


Figure 17: *Plan of typical Block C apartment arrangement.*

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.

Façade articulation has been considered as an important way to provide good amounts of visual interest to a building with the proposed façade also carefully informed by the internal spaces within. A detailed layering of elements such as high quality, sculptural, off-form architectural decorative concrete (with a variety of surface textures, oxide colourings and aggregates) metal window framing with projecting sunshade hoods and fins as well as deep façade recesses have been used to ensure a delicate and robust architectural expression. This has not been at the expense of the internal occupant amenity or the creation of an un-unified whole.

The proposed project material palette is formulated around both long lasting and natural materials. These materials include a combination of coloured and textured high quality off-form as well as more decorative (oxides, aggregates and surfaces finish texture) concrete, profiled façade tiling, dry-pressed brickwork (included recycle brickwork from the site), metal trims, blades etc, timber details and mouldings, low profile metal framed glazing, sandstone, and other durable, natural, and timeless materials. The use of these materials in the project will 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 setting.

The building's design positively responds to the principles of scale, proportion, and composition. The façade details and proposed finishes will offer a positive contribution to the changing character of the area.

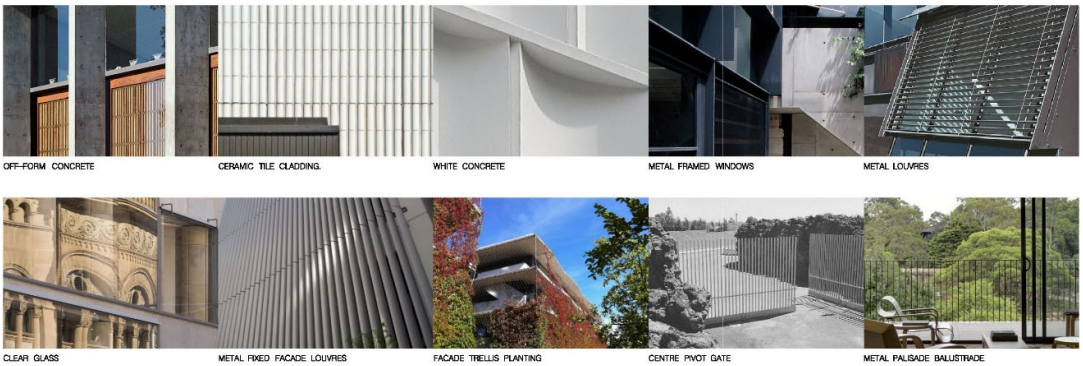


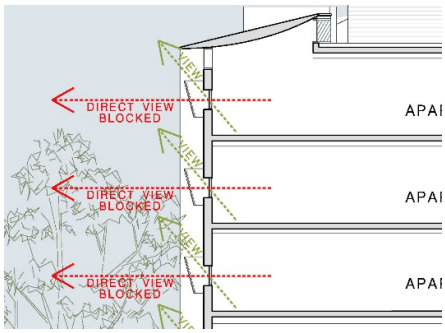
Figure 18: *Material palette for the project.*

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.*	Complies. 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.*	Complies. The proposed buildings' alignments are oriented both to allow for solar access into the residential apartments whilst also being respectful of 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 (Block B) has been sculpted to allow for solar access onto the southern residential building at 25-29 Victoria Parade Manly.
3C Public Domain Interface	
Objective 3C-1 *Transition between private and public domain is achieved without compromising safety and security.*	Complies. The residential apartments are located on the upper levels of the proposed buildings, clustered around their own separate and distinct lobbies.
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.

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).*	Complies. 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. The rooftop communal open space on top of Building C will only be available to the residents of Building C. The residents of Building D will still be able to enjoy the ground floor communal areas along with the high quality and expansive public spaces associated with the project's Manly Beach location (along with each Building D apartment's large private open space/balcony). This limiting of access to this rooftop space to only the Building C residents will also assist in ensuring that this area is secure.
Objective 3D-2 *Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting.*	Complies. 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. The roof top spaces to Block C are a more private area with BBQ and shaded pergolas contrasting with the lush, planted ground floor areas which offer a number of discrete refuge areas under Block D looking across to the ocean. Refer to accompanying Landscape drawings for further details.
Objective 3D-3 *Communal open space is designed to maximise safety.*	Complies. Access is controlled via lifts to the rooftop open communal area on Block C (with centralised electronic access control). The ground floor areas have barriers including fences and gates to control afterhours access. Communal spaces all have good amounts of visual surveillance with the ground floor areas visually well connected to both street/beach promenade along with the other ground floor activities.

ADG CRITERIA	COMPLIANCE
Objective 3D-4 *Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood.*	Complies. The communal spaces are respectful of the existing street pattern/ urban form alignment including offering up strong views of the ocean along its eastern ground floor edge (as well as the greater public domain along Wentworth St). This opening up of the ground plane allows for a strong visual connection through the project letting the beach atmosphere permeate into the development whilst also not overwhelming the foreshore zone with a street wall visual barrier.
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 the project includes a number of design solutions such that it is able to comply with the objectives of this control. Further this detailed development application complies with the Section 75W concept approval which did not include any deep soil planting areas. These include: a. the inclusion for a number of planting zones (central forecourt, eastern street edge, rooftop to Block C and D etc). b. Ground floor tree planting zones to be 1m deep. c. Rainwater collection, filtration and storage. No onsite detention is provided given the site's location in a flood prone area.
3F 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 habitable rooms and balconies* *4.5m between non-habitable rooms.*	Complies with objective (numerical variation). The project complies with the objective of this control rather than a one size fits all rule. A number of design solutions are employed here to ensure the project achieves a reasonable level of external and internal visual privacy (both for the project itself as well as the neighbours and general public). Some of these strategies 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 for above the horizontal views as well as sun shading.

ADG CRITERIA	COMPLIANCE
Objective 3F-1 (Con't) *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 habitable rooms and balconies* *4.5m between non-habitable rooms.*	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 make use of privacy screening (only to kitchen splash back windows) such that direct views onto Building C are not possible or alternatively have their windows directed north or south such that they don't look directly to Building C. The fixed privacy screens are such that they will still allow the occupant to see views of the sky and also allow for natural cross ventilation. They are considered not to impact the amenity of the apartment  **Figure 19:** *Diagram for privacy devices to kitchen splashback windows (Building D) to stop views across to Building C.* c. 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. Openings in Building C's commercial levels are screened to prevent views onto neighbouring property. ii. Commercial levels which have openings facing neighbouring properties are fitted with fixed privacy screens such that direct views out of these windows to the neighbours are not possible. Also, there is the provision of buffer landscape planting to provide the neighbours a pleasant visual outlook.

ADG CRITERIA	COMPLIANCE
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.*	Complies. All residential apartments receive generous amounts of light and air whilst also achieving good levels of visual privacy.
3G Pedestrian Access and Entries	
Objective 3G-1 *Building entries and pedestrian access connects to and addresses the public domain.*	Complies. 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.
Objective 3G-2 *Access, entries and pathways are accessible and easy to identify.*	Complies. Entries into the residential apartment lobbies are legible, clear and well surveyed by the adjacent ground floor uses (as well as the adjacent street and public domain).
Objective 3G-3 *Large sites provide pedestrian links for access to streets and connection to destinations.*	Complies. The project includes a new public forecourt and generous amounts of soft work landscaping. Further, the project includes a pedestrian link from the south-eastern portion of the site through the forecourt to Wentworth St.
3H Vehicle Access	
Objective 3H-1 *Vehicle access points are designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes.*	Complies. The project will use the current driveway location for the vehicle access into the basement carpark. This location sees pedestrian and car conflicts minimised by both rationalising the entries into a single (rather than multiple) entry as well as locating the entry away from the corner intersection and more active pedestrian areas.

ADG CRITERIA	COMPLIANCE
3J Bicycle and Car Parking	
Objective 3J-1 *Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas.*	Complies. Car and bicycle parking is provided based on Manly Development Control Plan 2013 rates.
Objective 3J-2 *Parking and facilities are provided for other modes of transport.*	Complies. Bicycle parking provided based on Manly Development Control Plan 2013 rates.
Objective 3J-3 *Car park design and access is safe and secure.*	Complies. The carpark has one secure vehicular entry/exit point with all pedestrian entries also secured and clearly identifiable. The internal areas of the carpark will be well lit with aisles looping through the development minimising less surveyed areas.
Objective 3J-4 *Visual and environmental impacts of underground car parking are minimised.*	Complies. The carpark includes an efficient layout with the provision for natural ventilation along its eastern street boundary.
Objective 3J-5 *Visual and environmental impacts of on-grade car parking are minimised.*	Not applicable. No on-grade car parking provided.
Objective 3J-6 *Visual and environmental impacts of above ground enclosed car parking are minimised.*	Not applicable. No 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* *1. 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.* *3. A maximum of 15% of apartments in a building receive no direct sunlight between 9am and 3pm at midwinter.*	Complies. 70% of apartments' living rooms and private open space receive 2 hours direct sunlight between 9 am and 3 pm at mid-winter. Refer to the accompanying Architectural drawings for further details.
Objective 4A-2 *Daylight access is maximised where sunlight is limited.*	Complies. Glazing is increased to living areas to ensure adequate day lighting to habitable areas
Objective 4A-3 *Design incorporates shading and glare control, particularly for warmer months.*	Complies. Façade articulation has been designed to assist with shading.
4B Natural Ventilation	
Objective 4B-1 *All habitable rooms are naturally ventilated.*	Complies. The apartment designs make extensive use of natural cross ventilation.
Objective 4B-2 *The layout and design of single aspect apartments maximises natural ventilation.*	Complies.
Objective 4B-3 *The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents.*	Complies. The project greatly exceeds the control for natural cross ventilation and includes many dual aspect apartments. Refer to the accompanying Architectural drawings for further details.

ADG CRITERIA	COMPLIANCE
4C Ceiling Heights	
Objective 4C-1 *Ceiling height achieves sufficient natural ventilation and daylight access.* *Design Criteria* *1. Measured from finished floor level to finished ceiling level, minimum ceiling heights are:* *Habitable rooms 2.7m* *Non-habitable 2.4m* *Mixed use 3.3m for ground and first floor*	Complies.
Objective 4C-2 *Ceiling height increases the sense of space and provides for well-proportioned rooms.*	Complies.
Objective 4C-3 *Ceiling heights contribute to the flexibility of building use over the life of the building.*	Complies.
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.*	Complies. All apartments exceed these minimum area requirements.
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.	Complies.

ADG CRITERIA	COMPLIANCE
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.*	Complies
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.*	Complies.
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.*	Complies. All apartment balconies exceed these minimum area requirements.

ADG CRITERIA	COMPLIANCE
Objective 4E-2 *Primary private open space and balconies are appropriately located to enhance liveability for residents.*	Complies. All private open space is located directly adjacent to living areas.
Objective 4E-3 *Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building.*	Complies. Inset balconies contribute to overall façade articulation.
Objective 4E-4 *Private open space and balcony design maximises safety.*	Complies.
4F Common Circulation and Spaces	
Objective 4F-1 *Common circulation spaces achieve good amenity and properly service the number of apartments.* *Design Criteria* *1. The maximum number of apartments off a circulation core on a single level is eight.* *2. For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.*	Complies.
Objective 4F-2 *Common circulation spaces promote safety and provide for social interaction between residents.*	Complies.
4G Storage	
Objective 4G-1 *Adequate, well-designed storage is provided in each apartment.* *Design Criteria* *1. In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided:* *Studio 4cbm* *1B 6cbm* *2B 8cbm* *3B 10cbm* *At least 50% of the required storage is to be located within the apartment.*	Complies. Apartments include good amounts of private storage.

ADG CRITERIA	COMPLIANCE
Objective 4G-2 *Additional storage is conveniently located, accessible and nominated for individual apartments.*	Complies. Additional storage is located in basement levels adjacent to the units' car spaces.
4H Acoustic Privacy	
Objective 4H-1 *Noise transfer is minimised through the siting of buildings and building layout.*	Complies.
Objective 4H-2 *Noise impacts are mitigated within apartments through layout and acoustic treatments.*	Complies. Habitable areas are typically buffered from wet areas through the use of joinery and / or hallways.
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.
Objective 4J-2 *Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission.*	Complies. Inset balconies and solid balustrades mitigate noise from adjacent units and the street.
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.*	Complies. Refer to Principle No. 8 within this report.
Objective 4K-2 *The apartment mix is distributed to suitable locations within the building.*	Complies. Each typical floorplate contains a varied apartment mix.
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.

ADG CRITERIA	COMPLIANCE
4M Facades	
Objective 4M-1 *Building facades provide visual interest along the street while respecting the character of the local area.*	Complies. Refer to Principle No. 9 within this report.
Objective 4M-2 *Building functions are expressed by the façade.*	Complies.
4N Roof Design	
Objective 4N-1 *Roof treatments are integrated into the building design and positively respond to the street.*	Complies. Planting on roofs provides a 'softening' of the building edge, in addition to providing visual interest from the public domain.
Objective 4N-2 *Opportunities to use roof space for residential accommodation and open space are maximised.*	Complies. 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 pleasant outlook.
Objective 4N-3 *Roof design incorporates sustainability features.*	Complies. The roof design for the project includes sustainability features such as landscape softworks (both Buildings C & D, rainwater capture, skylights, and sun shading elements such as pergolas.
4O Landscape Design	
Objective 4O-1 *Landscape design is viable and sustainable.*	Complies. Refer to accompanying Landscape Plans and design statement.
Objective 4O-2 *Landscape design contributes to the streetscape and amenity.*	Complies. Refer to accompanying Landscape Plans and design statement.
4P Planting on Structures	
Objective 4P-1 *Appropriate soil profiles are provided.*	Complies. Refer to accompanying Landscape Plans and design statement.

ADG CRITERIA	COMPLIANCE
Objective 4P-2 *Plant growth is optimised with appropriate selection and maintenance.*	Complies. Refer to accompanying Landscape Plans and design statement.
Objective 4P-3 *Planting on structures contributes to the quality and amenity of communal and public open spaces.*	Complies. Refer to accompanying Landscape Plans and design statement.
4Q Universal Design	
Objective 4Q-1 *Universal design features are included in apartment design to promote flexible housing for all community members.*	Complies. 20% of units (12 total) meet the Silver Level standards of Liveable Housing Australia Design Guidelines.
Objective 4Q-2 *A variety of apartments with adaptable designs are provided.*	Complies. 26% of units (15 total) are provided with adaptable designs.
Objective 4Q-3 *Apartment layouts are flexible and accommodate a range of lifestyle needs.*	Complies. Refer to Principle No. 8 within this report.
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.

ADG CRITERIA	COMPLIANCE
4S Mixed Use	
Objective 4S-1 *Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement.*	Complies. 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.*	Complies. Residential circulation areas are clearly defined and well expressed. Residential entries are separated from commercial entries and connected directly to the street. Residential car parking and communal facilities are separated from other building uses.
4T Awnings and Signage	
Objective 4T-1 *Awnings are well located and complement and integrate with the building design.*	Not Applicable. All building entries are suitably sheltered for arriving residents and visitors.
Objective 4T-2 *Signage responds to the context and desired streetscape character.*	Complies.
4U Energy Efficiency	
Objective 4U-1 *Development incorporates passive environmental design.*	Complies. Refer to Principle No. 4 within this report and section 4A in this compliance table.
Objective 4U-2 *Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer.*	Complies. Refer to Principle No. 4 within this report. The application includes passive solar design solutions such as deeply recessed balconies (operating as a sunshade) and extensive solar control treatments on the façade windows in order to control unwanted heat gain.
Objective 4U-3 *Adequate natural ventilation minimises the need for mechanical ventilation.*	Complies. The project easily exceeds the ADG requirement for natural cross ventilation.
4V Water Management and Conservation	
Objective 4V-1 *Potable water use is minimised.*	Complies.
Objective 4V-2 *Urban stormwater is treated on site before being discharged to receiving waters.*	Complies. Refer to accompanying Stormwater Concept Plan.

ADG CRITERIA	COMPLIANCE
Objective 4V-3 *Flood management systems are integrated into site design.*	Complies. Refer to accompanying Stormwater Concept Plan.
4W Waste Management	
Objective 4W-1 *Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents.*	Complies. Refer to accompanying Waste Management Plan.
Objective 4W-2 *Domestic waste is minimised by providing safe and convenient source separation and recycling.*	Complies. Refer to accompanying Waste Management Plan.
4X Building Maintenance	
Objective 4X-1 *Building design detail provides protection from weathering.*	Complies. Recesses within the façade, as well as screening and blade walls assist with weather protection.
Objective 4X-2 *Systems and access enable ease of maintenance.*	Complies. The project's facades are all accessible from upper common roof terraces.
Objective 4X-3 *Material selection reduces ongoing maintenance costs.*	Complies. Robust and low maintenance materials have been selected here give the harsh marine environment.

END.