



Design + Sustainability Advisory Panel Meeting Report – Date 23 February 2023

## Item 5 - DA2022/2256 - 22 Raglan Street MANLY

### PANEL COMMENT AND RECOMMENDATIONS

#### **General**

The proposal was originally referred to the Design and Sustainability Panel on 3 February 2022. At that meeting the Panel concluded:

*“The Panel is generally supportive of the proposal but notes that the current GFA should not be used as a benchmark. The final development potential should be determined by achieving very good amenity for the apartments and avoiding any adverse impacts on neighbouring properties and the public domain.*

*The Panel does not support the proposal in its current form. A complete redesign of the second floor and second floor mezzanine levels should be made, to increase the number of apartments gaining northern sun to their living areas and balconies and to provide a range of apartments within the apartment mix. The number of basement car spaces should reduce, in response to a reduction in the apartment numbers and the provision of more deep soil to support canopy tree growth.*

*Any breaching of the height controls would need to be supported by an analysis of the benefits compared to a complying scheme. Benefits may include best practice in sustainable design, including consideration of embodied energy in materials and the sustainability issues listed above. This proposal demonstrates an acceptable urban and architectural design character which could be complemented by excellent sustainability initiatives.*

*The Panel refer the applicant to the Apartment Design Guide for aspects related to amenity and the internal planning of apartments.”*

The Panel has been provided with a summary of the design responses to its recommendations. Most of the recommendations have been adopted.

Accordingly, this report focusses on matters of concern that remain.

#### **Floor space ratio and amount of floor space.**

The floor space ratio that applies to the site is 0.75:1. At the previous Panel meeting the applicant proposed that it would be reasonable for the new building to have a similar FSR to the existing building which was stated in the architect’s pre-DA report as:

*“The FSR of the existing backpackers building on the site is approximately 1.54:1”*

This report also noted that the FSR of nearby building also exceeded the 0.75:1 FSR:

*“The FSR control for the recently constructed neighbouring building at 18 Raglan St is also 0.75:1, but the approved and constructed FSR is about 1.5:1*

*The FSR control for the neighbouring building at 2-14 Pittwater Road is 1:1, but the constructed FSR is about 1.8:1, and the existing building could accommodate a further floor level within its height control which would increase its FSR higher still.*

*Given the above, it could be seen that the FSR control in this vicinity is inconsistent with the actual built environment and with the desired future character of the area.”*

The Panel did not accept that the existing GFA should be used as a benchmark. To restate the Panel’s position:



*The final development potential should be determined by achieving very good amenity for the apartments and avoiding any adverse impacts on neighbouring properties and the public domain.*

The reason the panel does not believe that the existing GFA is a reasonable benchmark or 'baseline' is that the form of the building is significantly different. The ground floor and first level of the existing building cover most of the site with the second level confined to the southeast corner.

The proposal instead is for 4 levels concentrated on the southern boundary.

Given the primary concern for improved amenity of the units, and less concern for the height and impacts on the public domain, which are acceptable, it is difficult to understand the basis or rationale for a further **increase of GFA** rather than a reduction.

The proposal presented at the meeting of 3 February 2022 had an FSR of 1.63:1, the revised proposal has an FSR of 1.77:1 an increase of 8.5% and 15% over the existing FSR of 1.54:1.

The Panel is primarily concerned with design quality not numerical compliance except where non-compliance results in poor internal amenity, additional impacts on neighbours or the public domain.

This is the case in relation to the most recent proposal.

The Panel agrees with the proposition that it is desirable to provide as much housing as possible in this highly accessible and desirable location, however it strongly disagrees that 'the market' should determine extravagant room sizes and an excessive provision of bathrooms that result in an excessive floor area.

The 'market' accepts much more modest room sizes and inclusions in the Manly submarket.

The Panel agrees that there should be more housing in accessible locations, but this should be affordable; inclusions in DA make these less affordable.

Additionally, it is the Panel's view that the internal planning is inefficient with excessive circulation.

Together these increases and indeed the original increase from 1.54:1 to 1.63:1 have the effect of reducing the rear setback and the potential for a more generous courtyard that could accommodate larger mature trees and improve privacy and overall amenity both for the residents of the subject site and neighbours.

The reconfiguration from a building that occupies almost the entire site area to one that is concentrated on the southern boundary is supported. However, it is the Panel's view that the opportunity to create a meaning full courtyard that can provide outlook and privacy at the same time as well as improved solar access for both the subject site and neighbouring sites has not been optimised.

Accordingly, the Panel makes the following recommendations:

## **Overall planning.**

### **Recommendations**

1. Increase the amount of retail on the ground floor
2. Rationalise the circulation within units
3. Reduce the number of bathrooms
4. Consider a single unit on the ground level that would allow the courtyard area and deep soil to be increased significantly
5. The entire building envelope should be setback an additional 3m from the northern boundary. As noted, this should be achievable if the internal areas of bathrooms, walk-in wardrobes, laundries internal studies and circulation spaces are rationalised and reduced.

## **Amenity**

The amenity of the units is reduced by their proximity to adjoining buildings on the lower levels. The inclusion of NDIS apartments is commended but the panel notes that if the ground floor was reduced to a single NDIS unit, it should be possible to have one of the upper units designed to meet the same standards.



Some of the bedrooms are very small but given the location and the dimensions of the site and available frontage the Panel agrees that it is better to have as many bedrooms as possible even if they are less than the ADG guidelines, noting that the length (area) could still be increased by redesign.

The Panel commends the inclusion of outdoor showers and surfboard storage areas but considers them to have poor amenity, to compromise bedroom 2 in unit 1 and the location and layout inconvenient,

Bedroom 2 in units 1 and 2 have very low amenity and outlook to the driveway in one and outdoor shower and AC units in the other. Both are set well under the floors above and will receive very little if any natural light.

The panel questions the amenity of having a WC opening off the pantries in units 3, 4, 6, 7.

The ensuite in Unit 9 is larger than the bedroom.

Units have linen cupboards in addition to storage in laundries.

Overall, the Panel considers the internal planning inefficient on the one hand and providing poor amenity on the other. A comprehensive redesign should improve both.

### **Recommendations**

6. Retain 2 NDIS compliant units in any redesign
7. Redesign ground floor units to provide an acceptable level of amenity for all bedrooms
8. Redesign all interior layouts to improve efficiency and amenity

## ***Access, vehicular movement and car parking***

### **Recommendations**

9. Rationalise and simplify circulation on the ground level
10. Review egress requirements with the aim of reducing the number of stairs from the basement, minimising the circulation space on the ground level and maximising active frontage. Amenity of the entry lobby could also be improved. It may be acceptable to have the storage along one wall of the lobby rather than duplicating circulation space.
11. Rearrange access to motorcycle parking, bicycle parking and storage- the current layout is impractical
12. Given the location and dimensions of the site the Panel supports the under-provision of car parking
13. Pull the basement 2-3 metres away from the northern boundary to increase the area of deep soil- this would appear possible if the carparking layout were re-arranged

## ***Landscape***

Deep soil is provided at 7% however it is only 2.459m wide. ADG requires 6m width.

The south facing communal open space area is supported.

ADG calls for 9cubic metres soil volume for a small tree.

### **Recommendations**

14. Select species that will provide privacy but consider species with more open foliage than Syzygium. An exotic deciduous species may be more appropriate in this courtyard situation.
15. Check volume and increase size of raised tree pots for trees
16. Increase deep soil by increasing the rear setback by reducing car parking further
17. Meet ADG 6m minimum dimension



## ***Façade treatment/Aesthetics***

The panel supports the design and materials proposed for the southern façade.

## ***Sustainability***

The building has a large roof area for the number of dwellings. Given the coastal location a very comfortable indoor environment should be achievable.

### **Recommendations**

#### 18. Decarbonisation of energy supply

- All services should be electric – gas for cooking, hot water and heating should be avoided
- Heat pump systems for apartments or other ways of providing electric hot water should be considered
- The storage of hot water can be considered a de-facto battery if heated by PVs during the day
- Until technologies for the use of hydrogen are developed and introduced, note the risk of gas reticulation becoming a 'stranded asset' and the possibility of additional costs to remove gas and rewire the building
- The Department of Planning advises that dwellings with electric heat pump hot water systems, efficient reverse cycle air conditioners and induction cooktops can achieve the higher BASIX standard. Accordingly, the Panel recommends that to contribute to design excellence in sustainability, these appliances and fittings be utilised as a sustainability commitment to avoid the use of high emission energy sources such as gas.
- Guidance is also provided by the Australian Green Building Council <https://gbca-web.s3.amazonaws.com/media/documents/a-practical-guide-to-electrification.pdf>

#### 19. Onsite power generation and storage

- Unshaded roof space is a valuable resource
- Using PV to provide shade to roof top common areas will generally be supported by the Panel if there are no additional adverse impacts
- PVs over green roofs perform better due to the local lower ambient air temperature
- On site battery storage has benefits for the grid and may be a highly desirable back-up during the transition to a de-carbonised grid

#### 20. EV charging

- Provide EV charging points for each unit
- Allow for bi-directional (2-way) charging of EV battery for powering the building

## **PANEL CONCLUSION**

**The Panel does not support the proposal in its current form.**

**No reasonable justification has been provided for exceeding the current FSR of 1.54:1. (This is separate to the test against clause 4.6 of the MLEP).**

**A redesign and substantial reduction in the floor area is required.**

**Maximisation of the size of the courtyard and rear setback and amenity of units should be a priority.**

**It should be possible to reduce the floor space further while retaining the number of units and improving their amenity.**