

# **DESIGN VERIFICATION STATEMENT - SEPP 65**

## NEW 4 STOREY RESIDENTIAL APARTMENT BUILDING

## 22-24 Raglan St, Manly

28 NOVEMBER 2022

#### Verification of Architectural Qualifications

Matt Carlisle is the director of Carlisle Architects and has led the design of this project from inception. He has a BSc (Arch) and BArch degree from the University of Sydney, is a member of the Australian Institute of Architects and holds current registration as an Architect through the New South Wales Architects Registration Board - Reg no 7739. He is registered under the NSW Design and Building Practitioners Act as a Design Practitioner - Architectural, with registration number DEP0002030.

#### Statement of Design

Carlisle Architects Pty Ltd are responsible for the design of this project and have worked with a wellrespected client and highly qualified consultants to provide this development proposal. In developing the design the controls and requirements of Manly LEP 2013 and Manly DCP 2013 have been taken into consideration, along with Pre-DA meeting comments from Northern Beaches Council officers and the Design and Sustainability Advisory Panel.

The project has been designed to provide a development that is respectful of the local environment and neighbours and which complies with the design principles of SEPP 65 and the objectives of Parts 3 and 4 of the Apartment Design Guide.

Carlisle Architects verify that the design quality principles set out in State Environmental Planning Policy No. 65 - Design Quality of Residential Flat Development are achieved for the proposed development as detailed in the following report.

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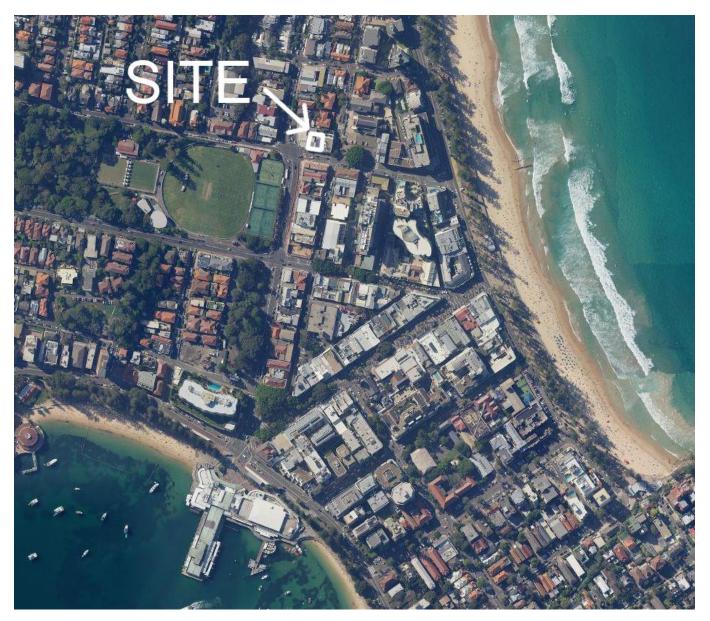
#### 1 INTRODUCTION

This SEPP 65 report is prepared in support of a Development Application for the demolition of the existing Stoke Beach House Backpackers (formally Manly Backpackers) at 22-24 Raglan St Manly and construction of a new high quality mixed-use retail and residential apartment building on the site. The proposed development will consist of 10 new residential units over ground plus three upper levels, including two dedicated NDIS Specialist Disability Accommodation (SDA) apartments to be constructed at the same time as the development (not adapted at a later date), a 50sqm retail unit addressing Raglan St at ground level and one level of underground car parking and associated landscaping.



## 2 SITE AND LOCALITY

The site is located on the edge of Manly Town Centre within a short walk of both Manly Beach and Manly Wharf. It is well served by shops and restaurants in central Manly, buses on Pittwater Rd, ferries at Manly Wharf and cycle lanes in the vicinity.



The site is zoned R3 but is located in-between two B2 zoned areas on Pittwater Road and Raglan St. Both its neighbouring buildings at 18 Raglan St and 2-14 Pittwater Road are built to their side and front boundaries and consist of retail uses at the ground floor, creating active street frontages to Raglan St between Pittwater Road and the corner of Whistler St.

The neighbouring mixed-use residential building to the east at 18 Raglan St has a blank western wall facing the site. The neighbouring office building to the west at 2-14 Pittwater Rd has a blank eastern wall on the boundary at ground level and office windows in the first floor set back about 1.5m from half-way along the side boundary.

The existing backpackers building on the site is built to its western boundary, and about 900mm from its eastern boundary. The proposed new building follows the same setbacks at the front half of the site.



Above: site located in-between two B2 zoned areas and on the edge of Manly Town Centre

The existing building on the site consists of the 'Stoke Beach House' backpackers (previously 'Manly Backpackers'), which is 2-3 storeys with ground level car-parking and covers almost 100% of the site.

The existing building is constructed from side boundary to side boundary, as are its neighbouring buildings at 18 Raglan St and 2-14 Pittwater Rd, creating a strong street edge to Raglan St.

The west half of the existing front façade was a 2-storey ambulance station constructed in face brickwork in the 1930's. It was not a particularly significant or unique piece of architecture, and has since been cement rendered and painted, the original first floor timber windows removed and replaced with aluminium, the ground floor windows and sills removed and replaced with solid plain doors, the original garage entry infilled, the roof tiles entirely replaced, and the building behind the façade mostly demolished and reconstructed to create a backpackers hostel.

The east half of the existing front façade was constructed in the early 1990's in a 3-storey pastiche copy of the east half with polystyrene mouldings which are now cracking and falling away.

The internal floor levels and window sills of each side of the façade don't match due to one side being 2 storeys and the other side 3 storeys. The front façade is set back about 1.5m from the front boundary, exposing an unattractive brick blade wall at 2-14 Pittwater Rd.

At the rear (north) boundary, the existing building is constructed about 1.5m from the boundary at ground level with no landscaping at all and with a communal lounge and tv room adjacent to the rear boundary.

The first floor is set back about 5m from the rear boundary and consists of a communal kitchen, dining and bar area open to the sky which creates noise to surrounding residents.



Above: Existing building with modified façade and different floor and window levels on each side

## **3 DESIGN PROPOSAL**

The proposal is for:

- Demolition of the existing backpackers building and construction of a new 4-storey mixed use retail and residential building with basement carpark
- ground floor retail space of 50sqm to activate the street frontage, proposed as a small local cultural community based use such as an art studio / teaching space and gallery
- 10 residential apartments consisting of a diverse socially-inclusive mix including dedicated disabled apartments at ground floor level and a mix of 1, 2 and 3 bedroom apartments on upper levels
- basement car parking for 14 cars, 2 motorcycles and 10 bicycles accessed from Raglan Street in the same location as the existing ground floor parking garage
- zero front setback, to create a strong street edge and align with neighbouring buildings
- side boundary to (nearly) side boundary development at the street elevation to create a strong streetscape without gaps, with larger side and rear boundary setbacks at the rear of the site where it adjoins residential uses
- a landscaped rear garden with screening trees, balcony planters and a landscaped awning over the footpath to continue the existing awning protection between 2-14 Pittwater Rd and 18 Raglan St for pedestrians

## 4. DESIGN VERIFICATION STATEMENT

#### **SEPP 65 DESIGN QUALITY PRINCIPLES**

#### Principle 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. Responding to context involves identifying the desirable elements of an area's existing or future character. Well designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood. Consideration of local context is important for all sites, including sites in established areas, those undergoing change or identified for change.

The proposed building enhances the existing streetscape by relating to the form, scale and material qualities of the neighbouring buildings in a contemporary manner and provides a strong and consistent edge to the street in scale with other buildings.

It is constructed to the front boundary to align with the adjacent buildings and to conceal the unattractive exposed east facing blade wall of the office building on the corner at 2-14 Pittwater Rd.

The recessed balconies and solid masonry to the street façade provides depth and character to the building. The brick and white rendered masonry arched forms reference the architecture of the existing ambulance station on the site and evoke the mood of traditional early 20<sup>th</sup> century beach style architecture typically found in Manly, yet presented in a contemporary manner.



Above: Proposed building in context - aligns with neighbouring buildings and adjoins and conceals unattractive protruding blade wall of neighbouring building at 2-14 Pittwater Rd

At the rear where the building interfaces with residential uses, it is stepped back from side and rear boundaries and complemented with full length deep planters on the rear (north) balconies to provide privacy between buildings. A deep soil zone at the rear provides space for 3 evergreen trees which create additional privacy between the apartments and the residential building to the north at 23-31 Whistler St.



Above: Rear of building set back from side and rear boundaries where it adjoins residential uses. Full length planter boxes on balcony edges and deep soil planting at rear boundary provide additional privacy.

The development also provides a sustainable form of urban consolidation in the area that takes full advantage of its close proximity to local retail and commercial centres on Sydney Road and The Corso, public transport at nearby Manly Wharf, as well as the local beaches, oval and natural reserves.

#### Principle 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.

In their Pre-DA meeting notes dated 3 Feb 2022, the Northern Beaches Design and Sustainability Advisory Panel state:

"On this site the Panel is not as concerned with numerical compliance with the controls- height, FSR and site coverage (given that these are already significantly exceeded by the existing building) but rather the quality of the design in relation the public domain, its context and internal amenity of the units."

The proposed masonry parapet height aligns with the adjacent blade wall parapet height at 2-14 Pittwater Rd and with the parapet of the neighbouring building to the east at 18 Raglan St.

The top floor is set 4m back from the front façade and clad in darker metal cladding to recess into the background of the streetscape, with trees and landscaping located on the 3<sup>rd</sup> floor and visible from the street above the parapet to soften the façade.

The form is layered horizontally in a classic tri-partite division with a defined base with its large face-brick arched forms under the landscaped footpath awning, a larger two-storey middle with its deep façade and full-width apartment balconies behind operable metal screens, and a smaller recessed top in vertical metal cladding partly concealed by the Level 3 communal roof terrace garden.

The façade is divided vertically into 3 equally wide elements with vertical recesses that extend from the ground up to the top of the parapet, including through the footpath awning and reflected at the top level. This formal treatment permits the façade to step back slightly to adjust to the angled front boundary, and serves to break down the mass of the building into vertical elements more in scale with the surrounding buildings in the Heritage Conservation Area and Manly Town Centre.



#### Above: Parapet aligns with neighbours, form divided horizontally and vertically to break down mass

The top (third) floor is similarly divided into three smaller elements with a landscaped communal open space and pergola in the centre, and all setback 4m from the façade as recommended by the Northern Beaches Design and Sustainability Advisory Panel in their Pre DA meeting notes who state:

"On a third floor provide a generous communal open space with accessible toilet. This space is to be accessible from the lift and stair core, which may be extended up to this level. Provide 2 apartments opening up to the north, with their private open space on the same level as, but screened from, the communal open space. These apartments must be set back a minimum of 4m from the Raglan Street frontage to minimise their visibility from the street. Their roof will be higher than the proposal, however the 4m setback will limit their visibility from the street. The proposed street frontage height, relating to the R.L. of the office building to the west, is to be retained."

The communal open space is provided with an accessible toilet, bbq and associated landscaping on the south side of the building overlooking the street in order to keep any potential noise and overlooking from groups using the communal space away from the residential neighbours to the north. It also provides a view from the communal open space towards the town centre, Manly Oval and down Raglan St towards the beach.



Above: Landscaped communal open space located away from residential neighbours to the north, with views over Manly Town Centre, Manly Oval and down Raglan St towards Manly Beach

The Design and Sustainability Advisory Panel state further in their Pre DA meeting notes: "On the second floor reduce the width of the 2 bedroom apartments on the northern side of the site so that they are at least 4.3m from the side boundaries. They may become 1 bedroom apartments; or remove one apartment per level as previously noted."

At the rear (north), the building form steps in from the side boundaries by 3m at ground and first floor, and 4.3m at second and third floors to provide solar access deep into the building and provides SEPP65 compliant distances and privacy from the residential uses to the rear.

The rear setback from the boundary is 6m to the balconies and 8m-9m to the living room glazed doors and windows, providing over 12m window separation to the neighbouring apartments at 23-31 Whistler St.

A 50sqm deep soil landscaped zone extends the full width of the rear boundary amounting to the required 7% of the site area, and providing for 8m-9m tall screening trees to the rear boundary.

This stepped form and internal layout of the building permits 8 of the 10 apartments to have north facing living rooms and balconies, as well providing 80% with natural cross-ventilation.



Above: Building form steps in from side and rear boundaries at the north to provide distance and privacy to residential neighbours to the north. Privacy screens fixed on balconies and north facing bedroom windows

#### **Principle 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. Appropriate densities are consistent with the area's existing or projected population. Appropriate densities can be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities and the environment.

The massing approach adopted whereby the building is aligned with front and side boundaries to provide a consistent active street front allows for a higher FSR and density than an R3 zoned site would typically have, without detrimental effects on neighbours or the streetscape.

The proposed density of 10 apartments on the site allows for a high quality of amenity for each apartment, which are generously sized both internally and externally yet efficiently designed. Each apartment has a large balcony exceeding the requirements of SEPP 65, and 80% of apartments are north facing and naturally cross ventilated.

The apartment mix comprises of  $1 \times 1$ -bedroom plus study,  $7 \times 2$  bedroom (most with study areas) and  $2 \times 3$ -bedroom. This mix caters to a variety of potential residents including families, single occupiers and down-sizers, and the building is fully disabled accessible.

There are two NDIS Specialist Disability Accommodation 2-bedroom, 2-bathroom apartments with large north facing landscaped terraces on the ground floor and to be constructed at the time of development (not adapted at a later date) with associated disabled car parking. These apartments provide accommodation for disabled people who may need a carer to live with them, and could be either sold to disabled persons or provide much needed disabled rental accommodation in a holiday destination.

It is not proposed to provide any additional adaptable apartments, as the provision of two fully constructed NDIS SDA Compliant disability apartments is deemed as a far better amenity than adaptable units that rarely get adapted for disabled use.

The site is located close to Manly town centre shops, and is well served by public transport at the ferry wharf and bus stops along Pittwater Rd and Belgrave St. The density is regarded as consistent with the projected and desired population of the area.

#### Principle 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. Other elements include recycling and reuse of materials and waste, use of sustainable materials and deep soil zone or groundwater recharge and vegetation.

80% of apartments have north facing living rooms and balconies / terraces and are naturally cross ventilated. These apartments are dual or triple aspect and as such they enjoy abundant natural light and ventilation reducing the need for air conditioning and artificial lighting.

Full width balconies are provided at both the north and south sides of the building allowing for glazed doors to both sides which further maximises natural light and ventilation.

The deep layered masonry façade to Raglan St provides shade to the glazing from the late afternoon western summer sun.

'L' shaped living rooms to the north provide areas of shallower balconies which permit solar access deep into the living rooms in winter reducing the need for artificial heating.

Concrete slabs, masonry walls and tiled floors will provide thermal mass to promote coolness to the building in the summer and store solar heat in the winter where tiles and masonry are exposed to direct sunlight.

Deep soil planting is provided across the full width of the north boundary of the site, large enough to support medium sized 8m – 9m tall trees providing filtered shade to the north facing balconies.

Full width deep and wide planter boxes are located on the north facing balconies receiving ample sunlight for residents to grow herbs, small fruits, or other consumable or ornamental plants.

A large green roof with four deep soil planter boxes are located on the third floor at the communal roof terrace to reduce heat island effect and with the potential to be used for herb gardens where reachable.

The gardens are irrigated with rainwater from a 12m3 storage tank located with the OSD tank at ground level.

The metal roof falls in a single pitch downwards to the north, creating an ideally proportioned large north facing flat roof with a 15kW-20kW solar PV system consisting of 1.5kW direct feed to each apartment as well as to common areas.

A large bicycle storage area is provided in the basement car park with enough space for 10 bicycles.

A large bin store located on the ground floor provides for separate recycling.

Highly energy efficient appliances are proposed within the BASIX commitments.

#### Principle 5 – Landscape

Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in attractive developments 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. Good landscape design enhances the development's environmental performance by retaining positive natural features which contribute to the local context, co-ordinating water and soil management, solar access, micro-climate, tree canopy, habitat values and preserving green networks. Good landscape design optimises useability, privacy and opportunities for social interaction, equitable access, and respect for neighbours' amenity and provides for practical establishment and long term management.

There is currently no landscaping at all on the site, apart from some minor decorative planting at the front. The existing building covers nearly all the site, and is built to within 1.2m of the rear boundary.

The proposed development provides a 50m2 deep soil zone along the length of the rear boundary which accounts for 7% of the site as required by SEPP 65. Three medium sized trees are proposed within this deep soil zone to provide filtered shade to the north facing balconies and privacy to the residential apartments to the rear of the development at 23-31 Whistler St. Smaller shrubs and ground covers are planted around the three trees to complete a lush rear garden setting.

Additionally the two NDIS Specialist Disability Accommodation apartments on the ground floor enjoy large north facing rear terraces with an additional 16m2 of 1m deep x 900mm wide planter boxes to the east and west sides, providing further soft landscaping to the rear terraces.

Upper level apartments are provided with 1m deep x 900mm wide planter boxes along the entire length of their generous north facing balconies, providing additional privacy screening to the rear and shade to their balconies.

The street awning is planted on top to provide soft landscaping to the streetscape, and creepers in pots are proposed on the ground floor street façade for planting to grow up the brick arches.

A 40m2 communal open space roof terrace at the third floor adjoins and overlooks a 40sqm green roof, which reduces the heat island effect and provides soft landscaping to the roof terrace. The green roof contains four deep soil planters supporting 4 small trees visible from both the roof terrace and the street below which provides a softness to the façade at the upper floor level.

A 12m3 rainwater storage tank uses rainwater to irrigate the gardens and a large 15kW PV system shades the light coloured metal roof further reducing heat island and heat gains in the building.

#### **Principle 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. Good amenity combines appropriate room dimensions and shapes, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas and ease of access for all age groups and degrees of mobility.

The building is located near Manly Beach and will be of the highest quality commensurate with its location. All apartments are generously proportioned, with 2.7m high ceilings and most with dual or triple aspect.

All 10 apartments achieve a high level of natural light with 80% of apartments having north facing living rooms and balconies / terraces and 80% achieving natural cross flow ventilation.

Generous balconies in excess of SEPP65 control sizes are provided to all apartments, and many have second Juliet balconies with operable metal screens on the south façade providing privacy to their bedrooms facing Raglan St.

In addition to the large private balconies, a 40sqm landscaped communal roof terrace is provided at the third floor level overlooking Raglan St, Manly Oval and down Raglan St towards Manly Beach. A bbq and accessible toilet are provided and a landscaped green roof adjoins the roof terrace.

The roof terrace is located on the Raglan Street side of the building to eliminate overlooking or noise nuisance to the neighbouring residential uses to the rear of the site which may result from the use of the communal terrace.

This location receives the late afternoon sun in summer and will be a lovely space for evening bbq's for residents in a contained area which doesn't overlook neighbours.

While not a north facing roof terrace, it is noted that the site is within a few minutes' walk of the ample public open space amenities of Manly Beach with its extensive public open spaces, parklands and boardwalk, as well as Manly Oval and Manly Town Centre opposite.

Visual and acoustic privacy is ensured with full solid masonry construction, a deep street façade, north facing balcony edge planter boxes and operable metal privacy screens facing Raglan Street.

All apartments have a bicycle space in addition to a dedicated storage area in the basement or ground floor as well as ample storage within the units.

The common lobbies are efficiently planned, with a maximum of just 3 apartments accessed from each lift lobby.

The owner's experience have led them to identify that there is an urgent need in Sydney for disabled apartments to be constructed in central locations and from the outset (not as adaptable apartments that can be adapted at a later date usually at significant cost and disruption, and often not sold or available to disabled persons).

The need comes from not just elderly disabled people, but also younger families or couples with a disabled member, and for disabled tourists requiring a disabled compliant apartment in a holiday destination location, which is a particularly unrepresented group.

As such two fully NDIS Specialist Disability Accommodation compliant 2-bedroom apartments are to be provided on the ground floor level, constructed from the outset. The master bedrooms open to the rear outdoor terraces and connect to an accessible ensuite bathroom. The second bedrooms and second bathrooms in these apartments provide for carers, family members or guests.

The proposed building has been carefully designed so that the proposed variations to the building height and FSR controls will not detrimentally effect the neighbours or streetscape, and indeed will provide an improvement on the current situation. It is noted that noise and disturbance from the existing backpackers has historically been an issue for the neighbouring residents and that conversion from a 100+ bed backpackers with an outdoor dining area and bar at the rear of the property to just 10 residential apartments will result in a much quieter and more appropriate neighbouring use.

## Principle 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. A positive relationship between public and private spaces is achieved through clearly defined secure access points and well lit and visible areas that are easily maintained and appropriate to the location and purpose.

The development as a whole optimises safety and security for residents.

The main entry is clearly defined in the centre of the Raglan St façade and well-lit both outside and inside.

The main entry door is fully glazed so residents can see in and out when entering and leaving the building.

All apartments feature clearly defined entries that are well lit and secure. Communal areas feature clear, safe access points, adequate lighting of entrances and pedestrian areas with clear definition of public and private spaces. Access to all residential areas of the development will be restricted to authorized people by a security system.

The proposed living rooms and bedrooms which overlook Raglan Street will provide 24 hour passive surveillance of the public domain, whist the operable metal screens on the south façade provide privacy and security to residents in the building.

The car parking spaces located in the basement will have security access via the internal lobby and garage door, and the fire egress stairs are fitted with security doors at the street level.

The retail unit on Raglan Street provides further activity and surveillance on the street.

## Principle 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. Well designed apartment developments respond to social context by providing housing and facilities to suit the existing and future social mix. Good design involves practical and flexible features, including different types of communal spaces for a broad range of people and providing opportunities for social interaction among residents.

The proposed development consists of 1 x 1-bed plus study, 7 x 2 bed, and 2 x 3 bed apartments. This provides a wide variety of apartments which can support individual occupants, downsizers, and families. Most apartments have a study area for home-working or a student or children's study area.

The ground floor apartments are 2-bedroom, 2-bathroom NDIS Specialist Disability Accommodation compliant apartments constructed with the development and providing housing for disabled people along with their carer or family members as discussed previously in this report.

Generous balconies / terraces with bbq's provide for family uses, outdoor dining, and entertaining.

The landscaped communal roof terrace on the third floor is equipped with a bbq and accessible bathroom and provides for outdoor dining and gathering for larger groups and inclusive social interaction in a central location near the beach.

#### **Principle 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. The visual appearance of a well designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.

The proposed façade is informed by the existing building on the site, by traditional early 20th century modernist buildings constructed in the vicinity of Manly Beach, and by its location within the Pittwater Road Heritage Conservation Area.

The western side of the facade was originally constructed as an ambulance station in face brickwork which has subsequently been cement rendered, painted and considerably altered when converted to a backpackers.

The eastern half of the front façade is a new addition constructed around 1990 in a pastiche copy of the original façade but on different levels, and is in poor condition.

A heritage impact statement by Weir Phillips Heritage Architects accompanies this DA.

The retention of the ambulance station façade into the proposed redevelopment was investigated but deemed impractical and aesthetically undesirable due to awkward floor and fenestration heights, poor condition of the existing façade, insufficient footings and the concern for severely compromised aesthetics.

The already altered existing ambulance station façade would have needed even more significant alterations to windows and floor levels, the roof would have needed major adjustment or demolition to provide appropriate amenity for windows and balconies, and a new façade on the east half in place of the 1990's addition would abut with its floors, windows and roof all on different levels to the west side making the building façade very messy and compromised.

Instead, it is proposed to demolish the existing building and replace it with a more refined and elegant building aesthetically, and with higher quality materials.

The proposed façade borrows its aesthetic language from the original ambulance station façade with a combination of arched and square openings in both face brickwork and rendered masonry, in a contemporary interpretation of classic beach side architecture.

The ground level off-white face brickwork at the public level is tactile and refined.

The upper levels consist of deep and robust masonry combining rendered brick and face brickwork which provides deep shadows in the late afternoon sunshine and a sense of solidity and classical refinement to the building.

Intricate lace metal screening on the façade softens its appearance and provides privacy to the apartment interiors from the street.

The façade is layered horizontally in a tri-partite arrangement and divided vertically into 3 narrower formal elements reflecting the grain and scale of the Heritage Conservation Area and Manly Town Centre.

A new footpath awning with landscaping on top provides protection for pedestrians on this side of Raglan St and connects the awing of 2-14 Pittwater Rd to the awning of 18 Raglan St, which is currently lacking with the existing façade.

Additionally, the new front façade is to be relocated onto the front boundary which helps define the street and conceals the existing unattractive brick blade wall currently exposed on the east side of 2-14 Pittwater Road.

The proposal responds to the future desired character of the area and informs the appearance and desired quality of any possible future redevelopment of the mixed use building on the corner adjacent at 2-14 Pittwater Rd for a much improved appearance at this location.

In their Pre-DA meeting notes dated 3 Feb 2022, the Northern Beaches Design and Sustainability Advisory Panel support the construction of a new building on the site and state:

"The proposed street façade relates well to the character of the existing building on the site and will create a wellproportioned and articulated street façade with depth that will create the desired future character for the street. The streetscape arches are an acceptable way of providing grain and articulation. The proposed height establishes an acceptable relationship with neighbours even though it is higher than the neighbouring street wall. This is the strength of the scheme."

Furthermore, the DSAP recommend:

"Retain façade proportions, parapet heights, depth of reveals, balconies, planter boxes and other elements of the proposed street façade. Set back the new top floor a minimum of 4m from the main façade and make it visually recessive, possibly by cladding it in a dark ribbed roof metal or other visually recessive colour and material."

The owners are committed to constructing a highly refined and elegant building to ensure the replacement to the already greatly altered ambulance station façade is a superior piece of architecture which enhances and improves the streetscape, is well mannered and suited to its location at the edge of the heritage conservation area.

#### CONCLUSION

The proposed mixed use apartment building at 22-24 Raglan Street Manly has been carefully designed to comply with the design principles of SEPP 65 and the objectives of Parts 3 and 4 of the Apartment Design Guide. It is respectful of the neighbouring properties and complies with the objectives of the Manly LEP and Development Control Plan. The proposal aims to enhance the existing context and streetscape with an elegant and well-mannered high quality residential development that compliments the area and contributes positively to the desired character of the locale. The proposal addresses and in most cases exceeds the principles outlined in SEPP 65 and as such we believe it is worthy of endorsement by Council.

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NSW ARB Registration No. 7739

DBP Act Registration: DEP 000 2030