

# Statement of Environmental Effects

## Development Applications for Substantial Alterations and Additions



**19-29 The Corso, Manly**

**12 April 2022**

**PREPARED BY**

**HAMPTONS PROPERTY SERVICES Pty Ltd**

*Head Office:* Suite 404 | Level 4 | 203-233 New South Head Road | Edgecliff NSW 2027

Tel (02) 9386 7000 | Fax (02) 9386 7001

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

**COPYRIGHT**

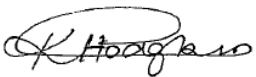
Hamptons Property Services is the owner of the copyright contained in this publication. Other than as permitted by the Copyright Act and as outlined in our terms of engagement, this report may not be reprinted, reproduced or used in any other form, transmitted or copied, by electronic, material or other means, without the prior written permission of Hamptons. Legal action will be taken against breach of copyright.

This report may only be used for the purpose commissioned and unauthorised use is prohibited. Hamptons assumes no responsibility if the document is used for purposes other than those directly associated with its commission.

**PROJECT PARTICULARS**

<b>Project No.</b>	2021053
<b>Client</b>	Iris Ivanhoe Operations Pty Ltd
<b>Site Address</b>	19-29 The Corso, Manly
<b>Document Name</b>	Statement of Environmental Effects

**Prepared by**

Date	Document Name	Authorisation	
		Name/Position	Signature
30 March 2022	Statement of Environmental Effects_V1	Kristy Hodgkinson <i>Director</i>	
11 April 2022	Statement of Environmental Effects_V2	Kristy Hodgkinson <i>Director</i>	
12 April 2022	Statement of Environmental Effects_V3	Kristy Hodgkinson <i>Director</i>	

In the event that this document is not signed, this is not representative of a final version of the document, suitable for assessment purposes.

**RELIANCE ON CONSULTANT INFORMATION**

As part of undertaking this project, Hamptons has relied on the professional advice provided by third party consultants. No responsibility is taken for the accuracy of the information relied upon by these consultants assisting the project. It is assumed that each of the consultants has made their own enquiries in relation to technical matters forming part of their expertise.



# CONTENTS

---

<b>INTRODUCTION .....</b>	<b>5</b>
<b>THE SITE &amp; ITS LOCALITY .....</b>	<b>10</b>
Heritage .....	12
Context .....	13
Foreshore Area and Soil Conditions .....	14
<b>THE PROPOSED DEVELOPMENT .....</b>	<b>15</b>
Design Philosophy .....	17
Structural Stability .....	17
Building Code of Australia .....	18
Acoustic Impacts .....	19
Heritage .....	20
Waste Management .....	22
<b>CONSULTATION .....</b>	<b>23</b>
Design Sustainability Advisory Panel .....	23
Agency Consultation .....	29
<b>SECTION 4.15 EVALUATION .....</b>	<b>31</b>
Key Issues, EPI & DCP Considerations .....	34
Heritage .....	34
Building Form .....	37
Floor Space Ratio .....	40
Building Height .....	41
Visual Privacy & Separation .....	41
Solar Access .....	42
Sustainability Measures .....	44
Crime Prevention .....	45
<b>CONCLUSION .....</b>	<b>47</b>
<b>APPENDIX 1: ENVIRONMENTAL PLANNING INSTRUMENT ASSESSMENT .....</b>	<b>48</b>



## TABLES

Table 1: Project Consultant Team .....	9
Table 2: Site Details .....	10
Table 3: Plan of the Proposed Development .....	16
Table 4: Pre-lodgement meeting minutes and Applicant's response.....	23
Table 5: Agency consultation undertaken by Applicant prior to lodgement of application .....	29
Table 6: Section 4.15 of EP & A Act .....	31

## FIGURES

Figure 1: Site Location .....	5
Figure 2: Zoning Map - B2 Local Centre.....	6
Figure 3: Aerial Location .....	11
Figure 4: Heritage Item and heritage conservation area.....	12
Figure 5: Acid sulfate soils - Class 4 .....	14
Figure 6: Foreshore scenic protection area.....	14
Figure 7: Floor space ratio - 2.5:1.....	40
Figure 8: Height of buildings – 10m.....	41
Figure 9: St Matthews Manly, located on the southern side of The Corso, opposite the site, at 1 Darley Road.....	43
Figure 10: Existing landscaping, located on the northern wall of St Matthews Church.....	43
Figure 11: Elevational shadow diagram demonstrating impact of the proposed building height, as directed by the MDCP, on the existing window opening to St Matthews Church .....	44
Figure 12: Additional overshadowing shown in orange that is caused by the additional building height proposed on 23 The Corso, recessed from the property boundary by 5.5m. This falls on existing landscaping and a blank section of wall of St Matthews Church.....	44



## INTRODUCTION

Hamptons Property Services (Hamptons) has been retained by Iris Ivanhoe Operations Pty Ltd, to prepare a development application for substantial alterations and additions to part of the existing buildings on the site, to allow for the adaptive reuse of these, along with stratum and strata subdivision of the land, known as 19-29 The Corso, Manly.

Figure 1: Site Location



Source: <https://www.maps.six.nsw.gov.au>

The proposal will include new retail spaces at the ground floor of 19-21 The Corso and building services. At the three upper building levels of 19-23 The Corso, these will be reconfigured to accommodate twelve apartments, being nine, two-bedroom apartments and three, one-bedroom apartments. Each apartment will be provided with a new balcony or wintergarden to provide outdoor living space, which is not currently availed to the residential component of the building. Existing light wells will be enhanced to increase amenity and natural light into what are, existing, substandard residential dwellings. New private open space areas will also be provided to the eastern apartments. A communal roof top area is proposed on the top of 19-21 The Corso for communal open space purposes.

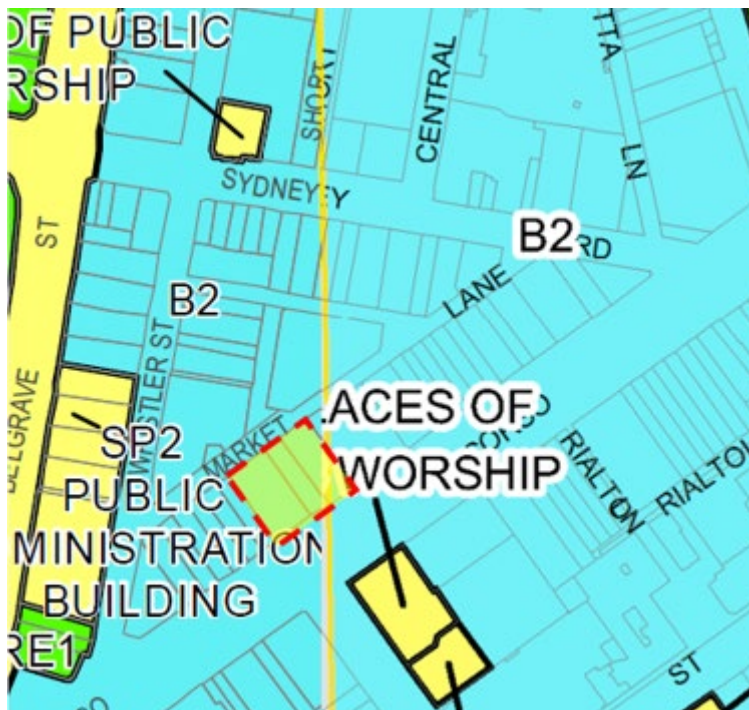
The existing strata building, which is currently not accessible, will also be upgraded to enable compliant building services, fire stair and lift arrangements.

The existing strata building, which is the subject of Fire Order No EPA2020/0234, will also be upgraded to enable compliance.

The existing heritage façade will be restored under the proposal.

Works to the remainder of the site, being 25-29 The Corso, are currently subject to separate modification applications (Mod 2022/0103 and 2022/0104) to facilitate enhancements to the existing Ivanhoe Hotel. Under the modification application 2022/0104, the first floor of 19-23 The Corso is proposed to be used in association with the Hotel. However, in the event that this application is approved, the use of the first floor will be for residential purposes as shown within this application. All other works, aside from the change from use associated with the pub at the first floor, to residential use, proposed under this application, will be enacted as proposed in those modification applications.

The application also seeks to create three separate strata, which will principally include The Ivanhoe Hotel, the retail tenancies and the residential component of the building. The residential apartments will be subject to further strata subdivision.



The site is located in the B2 Local Centre zone, pursuant to the Manly Local Environmental Plan 2013 (the **LEP**) and the proposal is permissible with development consent from Manly City Council (the **Council**) (Clause 1.6).

Figure 2: Zoning Map - B2 Local Centre

The adaptive reuse of the site has been the subject of two pre-lodgement meetings (PLM2021/0112 and PLM2021/0234) and a Design Sustainability Advisory Panel (DSAP) meeting (PLM2021 0234 19-23 The Corso September 23 2021) with the Council and of which the comments from these meetings have been taken into account in preparing this final application.

The key attributes of this scheme include:

- Restoration and adaptive reuse of 19-21 The Corso encompassing a series of design improvements through:
  - façade restoration



- addressing all matters the subject of the current Fire Order No EPA2020/0234 pertaining to part of the site
  - making all dwellings accessible through the introduction of a lift
  - improving amenity to the internal living spaces within the development with enhanced openings and retention or reinstatement of lightwells
  - provision of a roof top communal open space area to enhance the amenity for residents living in the development, given the limited opportunities for balconies on the building elevations having regard to side setback conditions and heritage considerations
  - enhanced environmental improvements to the building, including through the introduction of solar panels to the roof top
  - creation of a communal area at roof level for use by all residents of the building which results in a nett overall increase in access to communal open space areas associated with each individual dwelling over the existing situation, where no communal space is provided
  - expansion of the Market Lane façade openings, which will provide additional light, ventilation, outlook and improved amenity for occupants of the dwellings
  - achievement of 100% of dwelling within the development now achieving cross ventilation and 75% of dwellings being provided with solar access improved internal configuration of apartments to enhance the amenity of these to the rooms that most need aspects such as natural light and ventilation.
- a series of benefits to the public domain including:
    - proposing a building height that achieves the objective of the MDCP at Schedule 6, which recommends screening of the Council’s public carpark, when viewed from Darley Road which states that *new building height is to be approx. 600mm below the sill height of the top floor windows of No. 21 to retain outlook from those windows but also to disguise the view of the Market Lane car park when viewed from Darley Rd.)*
    - restoration of the heritage external façade and detailing
    - reinstatement of the heritage façade design to 23 The Corso across the ground and first floors (with parapet above level 2)
    - retail uses to Market Lane, adding to the activation of the laneway public realm by reducing the extent of building services to this frontage and increasing opportunities for passive surveillance over the street frontage
    - affordability being addressed with the introduction of single aspect, 1 bed dwellings
    - expansion of the Market Lane façade openings and the introduction of Juliet style balconies at the upper building floors, which will further activate the public realm of Market Lane with increased opportunities for passive surveillance, while also enhancing security and safety of the public along this frontage



- introduction of residential land use above the ground floor, together with additional balconies and roof top terraces to 23 The Corso, which will further activate the public realm of Market Lane with increased opportunities for passive surveillance, while also enhancing security and safety of the public along this frontage enhanced environmental improvements to the building, including through the introduction of solar panels to the roof top, which will reduce the overall carbon footprint.
- More generally, the proposed development will:
  - reduce overall embodied carbon, the quantum of material to landfill and material consumption generally through the adaptive reuse of the existing building façade and fabric at 19-21 The Corso (where practicable) in lieu of its demolition and replacement. This approach will reduce traffic, noise and vibration impacts as a result of reduced required construction-related vehicular movements to and from the site and overall reconstruction impacts more generally including noise, dust and vibration
  - replacement of existing building services which are aged and subject to compliance action by the Council, as it relates to fire services, ensuring occupant safety within the building
  - providing a design outcome that responds to the significant constraint of the existing Sydney Water Sewer Main running beneath the existing building which precludes basement construction and requires considered a comprehensive design solution to be developed to avoid impacts to this as a result of any inground works required
  - retaining the focus of public transport, walking and cycling to and from the site, by continuing the existing condition of not providing on-site car parking, thus reducing the carbon footprint otherwise attached to vehicular movements to and from the site
  - incorporation of requirements as required by Section J and BASIX requirements to enhance the environmental and operational aspects of the building, thus improving environmental performance
  - the retention and use of internal light wells and void spaces to maximise the amenity of internal spaces within each apartment, thus reducing reliance on artificial sources, while not being reliant upon these for that same purpose;
  - retention of sufficient non-residential floor space within the development to ensure that localised employment opportunities and commercial floor space is retained, consistent with the B2 Local Centre zone, that will not only service local needs of people living in, working and visiting the area, but also to provide employment in an accessible location, in terms of pedestrians, cycling and public transport access.

This report provides the following:

- a description of the site and the locality surrounding this;
- a description of the proposed development;





- key issues identified as part of the pre-lodgement meetings with Council
- the proposal's response to s.4.15 of the Environmental Planning & Assessment Act 1979 (EP & A Act); and
- conclusions and recommendations relating to the proposal.

This report has been prepared in conjunction with the following consultants for the purpose of informing this application.

**Table 1: Project Consultant Team**

Consultant	Discipline
Accessibility & BCA	AED
Architecture (including SEPP 65)	Durbach Block Jager Architects (DBJ)
Acoustics	Renzo Tonin & Associates
BASIX	Credwell Consulting Pty Ltd
BCA	AED
Cost Summary Report	Altus Group
Development Manager	Iris Capital
Fire Engineering	GHD
Geotechnical Investigations	GeoEnviro Consultancy Pty Ltd
Heritage	City Plan Heritage
Operational Waste Management Plans	Waste Audit
Construction Waste Management Plans	Waste Audit
Section J	Credwell Consulting Pty Ltd
Construction Management	Iris Capital
Survey	CMS
Structure	James Taylor & Associates

We trust that the enclosed information is sufficient for Council's consideration of the matter and look forward to working with Council during assessment of the development application.



## THE SITE & ITS LOCALITY

Table 3, below, provides the key information relating to the site.

**Table 2: Site Details**

<b>Property Address</b>	<b>19-23 The Corso, Manly</b> <b>25, 27, 29 The Corso, Manly</b>
Legal Description	Strata Plan 12989 Lot 2, Deposited Plan 877793 Lot 1, Deposited Plan 877793
Existing Use	Pub, retail and residential
Foreshore Scenic Protection Area	Yes
Critical Habitat	No
Contribution Plan	Northern Beaches Section 7.12 Contributions Plan 2019
Environmental Heritage	Yes
Conservation Area	Yes
Coastal Protection	No
Mine Subsidence	No
Road Widening or Realignment	No
Hazard Risk Restriction	Acid Sulphate Soils – Class 4
Flood Planning	Yes
Acquisition	No
Biodiversity Certified Land	No
Biobanking Agreements	No
Bushfire Prone Land	No
Property Vegetation Plan	No
Contamination	No

**Note.** Information above retrieved from Section 10.7(2) Certificate No ePLC2022/01101, dated 17/02/2022.

19-21 The Corso is a rectangular shaped building that has a four-storey Inter-war apartment building located above ground floor retail premises, that was constructed of brick, with a rendered façade with the majority of external elements intact. The Heritage Impact Statement provides the following relation to the exterior:

*The primary elevation (southeast) facing The Corso is symmetrical in form with timber-framed single hung windows running across the façade. The windows have extended lintels coloured in a different colour than the rest of the façade. The first-floor windows have an awning in the middle with decorative brackets. In between the first and the second floor, horizontal grooves run on both sides of the building. A horizontal moulding runs along the top parapet of the building with two decorative motifs on both*



Figure 3: Aerial Location



Source: <https://www.maps.six.nsw.gov.au>

*sides. The side and rear elevation of 19-21 The Corso also have windows with metal frames that appear to be installed recently.<sup>1</sup>*

The building is accessible from both The Corso and Market Lane and has multiple staircases servicing different sections of the building, along with two lightwells that are located in the northeast and southwestern corners of the building. The interior of the building is determined to have been heavily modified and has no significant elements remaining from the earlier period.

23 The Corso is a two-storey commercial infill building that has been heavily modified. To The Corso, the building has a plain façade with horizontal window openings to the upper floor, along with a stair entrance which provides access to the first floor of the building. The building also has an awning to the street front elevation.

The rear of the building, facing Market Lane takes on a simplified form with service openings at the ground floor and a horizontal window at the first floor, surrounded by concrete render. The building is also recessed from the street frontage.

25 & 27 The Corso. No 25 is a two storey building that has been highly modified, with the ground floor used as a bottle shop. The upper floor façade was remodelled in 2012-13 and now comprises four vertical sash

<sup>1</sup> Heritage Impact Statement, March 2022, Page 11

windows complemented by moulded architraves and a parapet that has turned balusters and pilasters, which also have moulded corners. No 25 also benefits from an open area, which is absent a rooftop above the ground floor.

No 27, which is a three storey building that has distinctive architectural detailing to its frontage to the east, including balcony, faceted windows and a parapet that has gabled pediment with engaged piers and moulded cornices. and is a two-storey commercial infill building that has been heavily modified. To The Corso, the building has a plain façade with horizontal window openings to the upper floor, along with a stair entrance which provides access to the first floor of the building. The building also has an awning to the street front elevation.

The rear of the buildings, facing Market Place comprises openings across the ground and first floor, some with louvred treatment, with the façade otherwise comprising concrete render finish and occupied by service elements, aside from a rear opening into the hotel. The ground floor of the building is recessed from the street frontage with the upper levels forward of the building alignment at the ground floor.

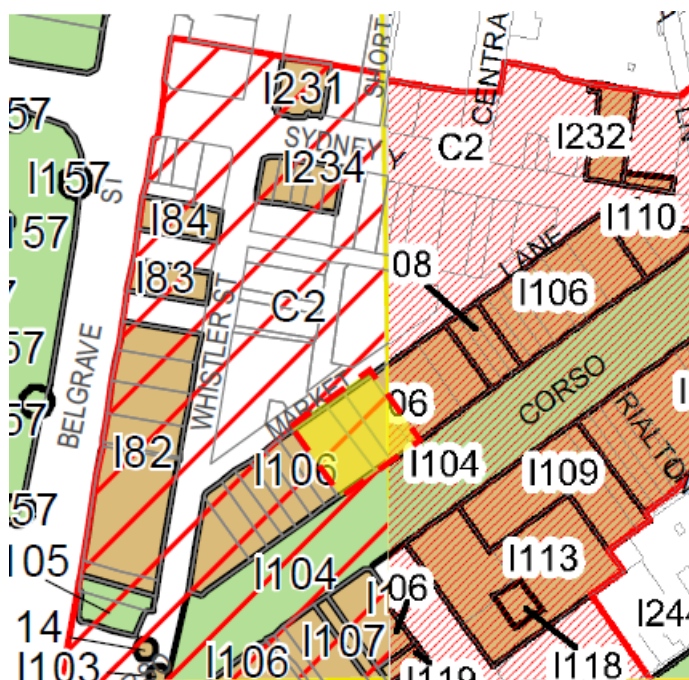
23-27 The Corso are occupied by the Ivanhoe Hotel.

### Heritage

The site is listed as a heritage item in accordance with Part 1 of Schedule 5 of the LEP 2013 and is described as Item I106, and known as *Group of commercial buildings*. The Statement of Significance for the site is reproduced below:

*The streetscape and its special qualities are of major significance to the state. The Corso has important historical links to the development of tourism and recreation which is still present and likely to continue. It's role as the pedestrian link between harbour and ocean, city and sea - for the tourist, is fundamental to Manly's status as a resort.<sup>2</sup>*

Figure 4: Heritage Item and heritage conservation area



<sup>2</sup> Heritage Impact Statement, City Plan, February 2022, Page 15

The site is also located within the curtilage of the Town Centre Heritage Conservation Area (C2) under Part 2 of Schedule 5 of the LEP 2013.

The site is also proximate to a number of heritage items, including the following:

- St Matthew's Church and Church Hall (I113)
- 'Street trees' The Corso (from Whistler Street to Sydney Road) (I104)
- Commercial building (I107)
- Group of Commercial Buildings (I109).

### *Context*

The context of the site is best described in the State Heritage Inventory Sheet for the site, which is part of the *Group of commercial buildings* and states as follows:

*The Corso is the NE-SW link between Manly Beach and Manly Cove. It acts as a low scale horizontal corridor which steps down from the harbour to the ocean. The architecture is generally of the early twentieth century with a number of late 19th century buildings remaining as evidence of the former streetscape. The atmosphere of The Corso is of a 19th century place. Its special qualities include the contrasts of horizontal (low scale architecture) and vertical (planting) dimensions, and urban and natural elements. Of particular importance is the spatial continuity of the streetscape - including horizontal and vertical planes and negative space - from pedestrian level. It has a cohesive character resulting from generally low scale of development on its principle streets, Construction to the property boundaries, slightly higher and distinctive corner buildings and a good level of pedestrian protection and amenity generated by footpath awnings and through-block arcades has produced strongly defined and comfortable urban spaces. These spaces range from the tight enclosure of the arcades through to the openness of the Ocean Beach promenade and the esplanade.*

*A formal street, 90' wide with a central avenue planting of mature Phoenix Palms and Moreton Bay Figs running from Manly Wharf to Manly Beach. As a space it is defined on each side by predominantly 2-3 storey commercial buildings, which create an excellent pedestrian scale enhanced by shop awnings, planting and the recent "mallings" of most of its length. St Matthew's Church, located on the intersection of Darley Rd, with its tower as a focal point, together with the oblique intersection of Sydney Rd, are important interruptions to the linear form of the Corso. At each end The Corso is open and merges into different spaces with good outward views to Shelley Beach, Queenscliff, Manly Cove and along Darley Road and Sydney Road. The gradual visual progression to the Pacific Ocean from manly Cove with the surf revealed behind a screen of Norfolk Pines is the essence of Manly's unique quality.<sup>3</sup>*

---

<sup>3</sup> Heritage Impact Statement, City Plan, February 2022, Page 10



### Foreshore Area and Soil Conditions

The site is classified as containing Class 4 Acid Sulfate Soils and is located in the foreshore scenic protection area.

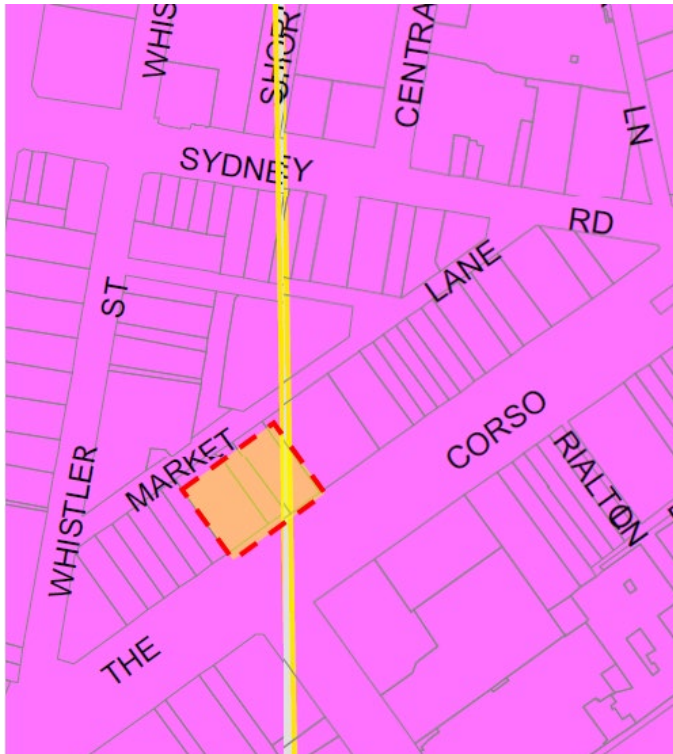


Figure 5: Acid sulfate soils - Class 4

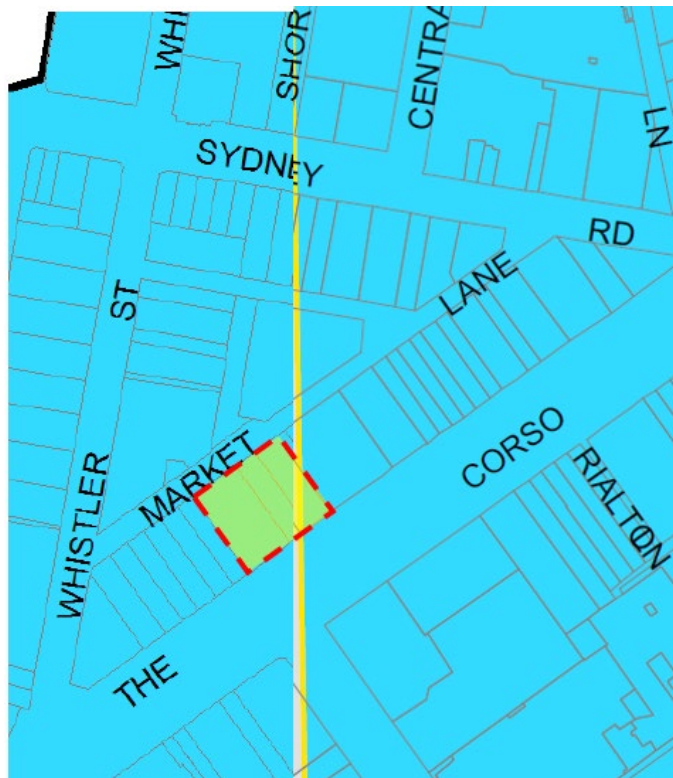


Figure 6: Foreshore scenic protection area



## THE PROPOSED DEVELOPMENT

The works to the building include various demolition works over 19-21 The Corso, which generally involve demolition of non-compliant access and building service areas across all building levels. The demolition works will make way for a new retail layout at the ground floor fronting The Corso and improved utilisation of space through to Market Lane, including a new retail tenancy fronting this to improve activation to the frontage. New ancillary retail office space will be created, along with building services. The works to No 23-29 The Corso, at the ground floor will be completed in accordance with Modification 2022/0103 and 2022/0104, which expand the existing hotel into No 23. The works to the first floor of No 23, under the modification application, would be superseded by the works the subject of this application at the first floor, which would be implemented through full demolition and reconstruction of No 23.

Most importantly, the existing building at 19-21 will be upgraded to provide a compliant lift on the eastern side of the building and fire stairs located directly south of this, which will service all levels.

At the first floor, four apartments will be provided, three of which will contain two bedrooms, and one apartment, on the south-western corner, containing one bedroom. Apartment A102 and A103 will be expanded through to No 23 to make these apartments larger in size and both will have a garden area, separated by privacy treatment, to provide improved external amenity to these apartments. A new wintergarden style balcony will be provided to the two apartments fronting Market Lane and a winter garden will also be provided to Apartment 1.04. The configuration of the apartments is generally around existing internal walls being retained, with the layouts reconfigured to improve the amenity enjoyed by these.

The same internal configuration is proposed at the second-floor level with the two eastern apartments being expanded over No 23 to facilitate additional living space to these. Three two-bedroom apartments and one, one-bedroom apartment are proposed. The south facing apartment on the eastern side will benefit from a balcony on its northern side, adjacent the living room, with a void area separating this with Apartment A2.02, which is located on the northern side of the building. The separation distance is 9m. Both of the northern apartments will have a new balcony, and the south-western apartment will have a wintergarden.

At the third floor, four apartments are proposed, three containing two-bedrooms and one containing one bedroom. The apartments on the western side of the building will have a balcony and winter garden respectively, while the apartments on the eastern side will each have an eastern balcony, which will benefit from the northern aspect. A bedroom is proposed over No 23, adjacent to the northern and southern side of the void area below, to enable an additional, second, bedroom to each of these apartments. Windows to these bedrooms will ensure that privacy between the apartments is retained.

The roof of No 19-21 will be used for communal outdoor open space purposes, as well as plant and equipment, all of which will be setback from the principal building frontages. The roof forms that are closes



to the street frontages will be provided with solar panels to enhance the environmental sustainability of the building. This communal outdoor area will also be serviced by the lift and stairs to maximise accessibility.

The apartments will range in size from 68m<sup>2</sup> to 114m<sup>2</sup>.

There is no existing car parking provision on the site to service either the residential or commercial components and the status quo will be retained.

All works will remain clear of the existing Sydney Water sewer easement which runs beneath the building at 19-21 The Corso.

**Table 3: Plan of the Proposed Development**

Drawing No.	Dated	Prepared By
DA-00 - Title Sheet	01/04/2022	Durbach Block Jagers
DA-01 - Site Analysis Plan	01/04/2022	Durbach Block Jagers
DA-03 - GF and 1 <sup>st</sup> Floor Plans - Existing	01/04/2022	Durbach Block Jagers
DA-04 - 2nd and 3rd Floor Plans - Existing	01/04/2022	Durbach Block Jagers
DA-05 - Roof Plan - Existing	01/04/2022	Durbach Block Jagers
DA-06 – Existing North & South Elevations	01/04/2022	Durbach Block Jagers
DA-07 – Existing East and West Elevations	01/04/2022	Durbach Block Jagers
DA-08 – Existing – Sections	01/04/2022	Durbach Block Jagers
DA-09 - Existing – Shadow Diagrams	01/04/2022	Durbach Block Jagers
DA-10 – Existing – Sun Eye Views	01/04/2022	Durbach Block Jagers
DA-11 - GF and 1 <sup>st</sup> Floor Plans - Demolition	01/04/2022	Durbach Block Jagers
DA-12 - 2nd and 3rd Floor Plans - Demolition	01/04/2022	Durbach Block Jagers
DA-13 - Roof Plan - Demolition	01/04/2022	Durbach Block Jagers
DA-14 – Sections – Demolition	01/04/2022	Durbach Block Jagers
DA-15 - GF and 1 <sup>st</sup> Floor Plans	01/04/2022	Durbach Block Jagers
DA-16 - 2nd and 3rd Floor Plans	01/04/2022	Durbach Block Jagers
DA-17 - Roof Plan	01/04/2022	Durbach Block Jagers
DA-18 – Proposed North & South Elevations	01/04/2022	Durbach Block Jagers
DA-19 – Proposed East and West Elevations	01/04/2022	Durbach Block Jagers
DA-20 – Proposed – Sections	01/04/2022	Durbach Block Jagers
DA-21 - Proposed – Shadow Diagrams (Sch. 6 DCP)	01/04/2022	Durbach Block Jagers
DA-21 - Proposed – Shadow Diagrams	01/04/2022	Durbach Block Jagers
DA-22 – Proposed – Sun Eye Views	01/04/2022	Durbach Block Jagers
DA-24 – GFA Plans	01/04/2022	Durbach Block Jagers





Drawing No.	Dated	Prepared By
DA-25 Subdivision Plans	01/04/2022	Durbach Block Jagers

In considering the modified works a number of technical disciplines have provided input to the design, as detailed below.

### *Design Philosophy*

The design philosophy for the proposed development is set out in the SEPP 65 statement, prepared by DBJ.

### *Structural Stability*

The proposed modified works have been considered by James Taylor & Associates. The advice provides the following:

*We have inspected the site. The building appears generally in fair condition for its age. It does not appear to have had regular maintenance therefore external steel elements are weathered (exhibiting corrosion). Cracking is evident in the norther brick façade. Alterations to the ground floor retail space have been carried out some time in the past. The date of these works is not known.*

*The proposed alterations and additions will require the construction of new foundations for the lift and stairs and transfer beam support columns. New transfer beams and supporting columns are required to support the new floor loads and wall removal.*

*The presence of the sewer beneath the building and the required clearances nominated by Sydney Water restricts the location and depth of new foundations in some areas. Preliminary consultation with a Sydney Water Accredited Service Provider (MPG) has indicated that expected minimum clearance requirements can be accommodated.*

*We have reviewed the proposed works and prepared a concept structural design to accommodate the changes without additional load being placed on the existing sewer asset. As such, the ground floor panning requires some flexibility for the demolition extent and the placement of additional transfer columns and foundations to suit.*

*The extension of the footprint over the adjacent property (#23) is likely to require the reconstruction of that building to provide adequate support. This building is understood to have less heritage significance than #19-21.*

*The proposed development application scheme represents some structural challenges as described above. These challenges have feasible solutions utilising proven industry standard techniques (such as screw piling/jet grouting). The final coordinated structural design will be documented and certified during the Construction Certificate process.*

*The final structural solution will be subject to assessment by Sydney Water. If Sydney Water approval is required, it may be addressed with the Construction Certificate stage following completion of the scheme's design development.*

*We consider the proposed works shown on the architectural drawings to be feasible, subject to a detailed design development process provided they are carried out by an experienced, competent contractor.*<sup>4</sup>

As such, the proposed are acceptable from a structural design perspective.

### *Building Code of Australia*

The proposed development has been considered by AED Consulting and requires a minor number of performance-based solutions to ensure compliance with the Building Code of Australia (BCA). In summary the following is required:

- a fire wall will be required to surround the Ivanhoe Hotel at the ground floor level at both the vertical and horizontal interface
- adequate protection to external walls will be required along the western section of the building adjacent the lightwell, as the openings are within 3m of the property boundary
- the northern and southern openings facing into the void area will be required for Levels 1, 2 and 3, on the eastern side because of their proximity to the site boundary
- a fire-engineered performance solution will be required to the internal stair as it connects more than three building levels
- a fire-engineered performance solution will be required for two internal corridors, where the path of travel is less than 1m in width
- certain doorways have insufficient circulation space and latch side clearances in accordance with cl. 13.3 of AS 1428.1 – 2009 and will require a performance solution
- insufficient turning spaces are provided for sole occupancy units and will require a performance solution
- a fire-engineered performance solution in relation to technical non-compliance is required in relation to the fire hydrant booster
- further details of internal laundries are required
- a performance solution will be required for the extent of natural lighting at Level 1 given the horizontal distance from the wall, on the western side of the building
- a performance solution will be required in relation to the entrance doorway having regard to cl. 4.3.1 of AS 4299.1995, as well as certain internal doorways (cl. 4.3.3, Cl. 4.6.1).

---

<sup>4</sup> Structural Design Advice, James Taylor & Associates, 15 February 2022, Page 3



Therefore, the proposed works can achieve the relevant requirements of the Building Code of Australia with performance solutions being required in relation to aspects of fire safety and access requirements, as necessary.

### *Acoustic Impacts*

The potential source of noise impacts that may impact upon, in particular, the residential use of the site is noise from the beer garden located on Level 1 of the Ivanhoe Hotel, at 25 The Corso, and pedestrian-related noise from the surrounding street frontages, but in particular, The Corso.

To establish the impact of the modifications, three locations were used to monitor the impacts of the existing development and to determine whether the proposed modifications would result in any additional impact to these properties, which are identified as the nearest sensitive receivers. These include Apartments at 2 Darley Street, 5 and 7 Whistler Street and 63 The Corso. Further, having regard to the permitted hours of operation of the premises, which are 9am-3am, Monday to Thursday, 9am-6am Friday and Saturday and 9am-12 midnight on Sunday, the critical period of assessment is the night time period between 10pm and 7am.

Having regard to the proposal, the following mitigation measures are recommended for incorporation into the development:

- glazing to the ground floor commercial and retail uses is to comprise a glazing thickness of 10mm (Rw33)
- glazing to the residential component is to be in accordance with Appendix B of the Acoustic Assessment and provides for various thickness of glazing treatment and include:
  - Rw29 6mm thickness, generally to bathrooms
  - 10.38mm laminated Rw35 glazing to bedroom and living areas
  - 12.5mm laminated Rw38 glazing to rooms that interface with the street front boundaries of the site, or where apartments face each other on the eastern side of the site
  - 10.38mm/150mm airgap/10mm or Christoffel Rw41 or equal in other areas generally connected with lightwells or balconies
- outside air openings that are designed for ventilation systems are to occur such that the acoustic performance of the building shell is not impacted and alternative ventilation/ air conditioning is available
- external walls are to consist of masonry and the bedrooms on the eastern façade of Level 2 and 3 are to have 2 x 13mm plasterboard lining that is connected to the studwork along the eastern wall
- operable glass windows and doors are to have acoustic seals equivalent to Q-Lon, including when in the closed position
- the winter gardens are to be capable of being enclosed with glass louvres or similar that have a minimum Rw of 26



- glass elements are to have a minimum thickness of 6mm
- mechanical services equipment is to comply with the requirements of the Acoustic report and is to include procurement of quiet plant, strategic position of plant equipment to ensure that this is away from sensitive neighbouring premises, with maximum shielding
- commercially available silencers or acoustic attenuators for air discharge and air intake are to be applied
- partially or fully enclosed acoustic treatment is to be provided over plant
- all equipment is to have their noise specifications checked prior to installation.

The Conclusion of the Acoustic Assessment is that as long as the recommendations are implemented:

- *Future occupants can be adequately protected from the Ivanhoe Hotel operational noise (existing and future<sup>5</sup>)*
- *Noise from plant and equipment from the proposed development itself will be controlled so as to avoid an excessive noise impact on nearby development.<sup>6</sup>*

### Heritage

The Heritage Impact Statement addresses the proposed changes relating to both the integrity of the building fabric and the proposed subdivision arrangements, which are reproduced below.

#### Fabric Integrity

*19-23 The Corso at Manly has been assessed as having historic, aesthetic, social and representative significance to the Manly area with which CPH concurs with the exception of the existing building at 23 The Corso as it has been significantly modified/rebuilt and no longer presents historical or aesthetic values that is appreciated along The Corso. It is clear from the site inspection undertaken on 24 January 2022 that the remnant significant fabric has been confined to the exterior form and façade of the subject apartment building described as 19-21 The Corso, particularly the single hung timber framed windows and decorative fascia.*

*According to the established history of the subject site, this was a part of 100 acre grant made to John Thompson (Deputy Surveyor General) in 1842 and in 1856, the area was cleared and names as ‘The Corso’ by Henry Gilbert Smith. The south-eastern façade of 19-21 The Corso comprise of remaining original fabric and is still intact with original brackets, awnings, lintel details, mouldings and timber framed single hung windows. However, the ground floor shop front has been modified as per the current requirements. As noted above, 23 The Corso, which is an infill, has a plain façade with a horizontal window to the upper*

---

<sup>5</sup> Future development relates to the modification applications [Mod 2022/0103 and 2022/0104] currently being assessed by the Council

<sup>6</sup> Acoustic Assessment, Renzo Tonin & Associates, 29 March 2022, Page 12



*floor and a pop-up store to the ground floor and a stair entrance to the upper floor commercial office. Both buildings (19-21 The Corso and 23 The Corso) feature a cantilevered awning similar to those seen along The Corso. The overall form of 19-21 The Corso thus retain significant remnant heritage fabric.*

*Internally, the apartment building has undergone various alterations and the interior has been modified to accommodate the contemporary requirements and changing nature of visitor accommodation. The interior is entirely comprised of later additions with carpet and tiled flooring, wall finishes, aluminium framed windows, facets of kitchen and bathrooms in the apartments, and fire safety equipment. The internal staircase connecting with the upper levels appears original with the timber windows alongside the south-eastern façade. The reconfigured internal layout provides little to no evidence of the original detailing with a labyrinth-like later configuration. Therefore, the integrity of the interiors of the building is considered to be low with primarily non-original finishes.<sup>7</sup>*

### **Strata Subdivision**

*As mentioned above, the proposed alterations and additions to part of the existing buildings on the site will allow for the adaptive reuse and the stratum and strata subdivision of the land, known as 19-29 The Corso, Manly. This will include new retail spaces on the ground floor of 19-21 The Corso, as well as ancillary office space and building services. At the three upper building levels of 19-23 The Corso, these will be reconfigured to accommodate residential apartments. The land at 19-29 The Corso is currently under single ownership, but the proposed works involve strata subdivision where The Ivanhoe Hotel will be amended under Hotel Stratum, the ground floor retail area at 19-23 The Corso under Retail Stratum and the four-storey apartments under residential Stratum.*

*The Strata subdivision will have no impact on the fabric of the significant items but will require consideration of a management strategy for the significant/early fabric within each strata/stratum in order to ensure they are maintained on a regular basis as part of the ongoing maintenance plan for each respective stratum. Multiple ownerships will require designated management who will be responsible for the ongoing maintenance of the fabric. The proposal can either include single management strategy for the ongoing maintenance of the significant items, or each stratum could be allocated with individual management strategies for the regular and ongoing maintenance of the fabric of the heritage items. Either of these options will be appropriate for the management of identified heritage values of the subject buildings which should be addressed through conditions of development consent.<sup>8</sup>*

---

<sup>7</sup> Heritage Impact Statement, City Plan, February 2022, Page 17

<sup>8</sup> Heritage Impact Statement, City Plan, February 2022, Page 17



### *Waste Management*

A Demolition & Construction Waste Management Plan has been prepared by Waste Audit and may be found under separate cover. This Plan addresses the Council's requirements in relation to demolition and construction waste associated with the proposed development.

An Operational Waste Management Plan has also been prepared by Waste Audit. This demonstrates that, based on the required bin capacity, there is sufficient storage room for the required number of bins to service the development. Bin collection will occur from the Market Place frontage of the site.

### Construction Management Plan

A Construction Management Plan has been prepared by Iris Capital and accompanies this application.



## CONSULTATION

### Design Sustainability Advisory Panel

A pre-lodgement meeting was held with the Council on 22 September 2021. The table below provides the minutes of that meeting and how this development application responds to the matters raised.

Table 4: Pre-lodgement meeting minutes and Applicant's response

Panel advice, September 23, 2021 (para phrased)	Proponent response
<b>Introductory comments</b>	
<i>Panel commends external façade and detailing</i>	<p>Noted.</p> <p>The external façade and detailing have been further enhanced through the expansion of the existing Market Lane façade openings to provide additional light, ventilation, outlook and amenity for occupants of the proposed dwellings.</p> <p>The existing eastern and western light wells have both been expanded and are open on their fourth side with the exception of Level 1, where the lightwell is partially open on its fourth side, with window openings protected by drenchers on each level for fire protection purposes.</p>
<i>Previous advice to retain existing lightwells creates poor quality internal layouts (poor amenity, light, acoustic privacy and ventilation)</i>	<p>This advice contradicts NBC's heritage specialist advice that <b>"The external facades should be retained as existing and restored as necessary, including the light wells on both sides"</b> (Reiterated in the PLM2021/0234 on 30 September 2021 by NBC specialist heritage officer Brendan Gavin)</p> <p>The current design endeavours to balance these competing heritage and design interests by:</p> <ul style="list-style-type: none"> <li>• expanding the existing light wells on each side of the building, as follows: <ul style="list-style-type: none"> <li>○ the existing western light well has been expanded and is open on its fourth side with exception of Level 1 which is partially open on its 4<sup>th</sup> side with window openings protected by drenchers on each level.</li> <li>○ the eastern light well has been significantly expanded and is open on its fourth side with the exception of Level 1, which is partially open on its fourth side and window openings protected by drenchers on each level.</li> </ul> </li> <li>• replanning the internal layout of apartments to provide for additional amenity through increased access to natural light and ventilation (noting that the "light well" is generally not fully enclosed on all four</li> </ul>



	<p>sides. Acoustic privacy from the Ivanhoe Hotel is achieved through use of acoustic screening and high-performance glazing treatments as set out in the Acoustic Assessment.</p> <ul style="list-style-type: none"> <li>The outcome also represents a significant improvement with 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24.</li> </ul>
<p><i>Non compliance with planning controls can be considered where there is demonstrated:</i></p> <ul style="list-style-type: none"> <li><i>Improvement in amenity (overshadowing, privacy, access to roof top open space)</i></li>   <li><i>Contributions to public domain or other benefits (incl environmental performance)</i></li> </ul>	<p>The proposed scheme demonstrates Design Improvements through:</p> <ul style="list-style-type: none"> <li>restoration of the external façade and detailing that assists addressing all matters the subject of a current fire order</li> <li>making all dwellings accessible through the introduction of a lift</li> <li>improving amenity to the internal living spaces within the development</li> <li>provision of a roof top communal open space area to enhance the amenity for residents living in the development</li> <li>enhanced environmental improvements to the building, including through the introduction of solar panels to the roof top</li> <li>Creation of a communal area at the roof level for use by all residents of the building which also results in a nett overall increase in access to communal open space areas associated with each individual dwelling, where no such access is currently available</li> <li>expansion of the Market Lane façade openings, which will provide additional light, ventilation, outlook and improved amenity for occupants of the dwellings.</li> </ul> <p>The outcome also represents a significant improvement with 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24</p> <p>The proposed scheme demonstrates Public Domain contributions through:</p> <ul style="list-style-type: none"> <li>achieving the objective of the MDCP Schedule 6, which recommends screening of the Council’s public carpark, when viewed from Darley Road which provides for <i>new building height is to be approx. 600mm below the sill height of the top floor windows of No. 21 to retain outlook from those windows but also to disguise the view of the Market Lane car park when viewed from Darley Rd.)</i></li> <li>restoration of the heritage external façade and detailing</li> </ul>





	<ul style="list-style-type: none"> <li>• reinstatement of the heritage façade design to 23 The Corso across ground and first floors (with parapet above Level 2)</li> <li>• retail activation to Market Lane adding to the activation of the laneway public realm</li> <li>• affordability being addressed with the introduction of single aspect 1 bed dwellings</li> <li>• expansion of the Market Lane façade openings and the introduction of Juliet style balconies which will: <ul style="list-style-type: none"> <li>○ further activate the Market Lane public realm</li> <li>○ enhance passive surveillance opportunities over Market Lane and improve safety and security within the public realm of Market Lane</li> </ul> </li> <li>• introduction of residential land use above the ground floor, together with additional balconies and roof top terraces to 23 The Coro, which will assist: <ul style="list-style-type: none"> <li>○ further activate the Market Lane public realm</li> <li>○ enhance passive surveillance opportunities over Market Lane and improve safety and security within the public realm of Market Lane</li> </ul> </li> <li>• enhanced environmental improvements to the building, including through the introduction of solar panels to the roof top.</li> </ul>
<p><i>The value and restoration of the external façade and detailing assists in potentially waiving some compliance controls</i></p>	<p>The proposed development exceeds the permitted height of buildings standard; it does, however, comply with the FSR development standard.</p>
<p><i>The Panel does not feel the compliance issues are problematic for approval given recommended design changes are achieved</i></p>	<p>Recommended design changes have been achieved through:</p> <ul style="list-style-type: none"> <li>• significant improvements to apartment layouts over the existing building configuration, including: <ul style="list-style-type: none"> <li>○ expanding existing light wells, which are typically enclosed on three sides above Level 1</li> <li>○ replanning the internal configuration of apartments to ensure that living spaces have access to external building surfaces</li> <li>○ replacement of the small eastern lightwell, with a significantly larger lightwell that results in a significant increase in opportunities for natural light and ventilation into the building.</li> </ul> </li> <li>• diverse range of apartments within the development that will improve opportunities for affordability in this location</li> <li>• expanding the eastern light well which enables the introduction of dual aspect apartments, thus improving cross ventilation, light and amenity</li> </ul>



	<ul style="list-style-type: none"> <li>The outcome also represents a significant improvement with 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24</li> </ul>
<b>General</b>	
<b>Strategic context.</b> Panel is very supportive of shop top housing for this older style heritage apartment block	Adopted. Shop top housing has been adopted across both 19-21 and 23 The Corso
<b>Scale, built form and articulation.</b>	
<i>The proposal exceeds height and FSR however the Panel considers the proposal is NOT and overdevelopment of the site and could be supported</i>	The proposed development exceeds the permitted height of buildings standard; it does, however, comply with the FSR development standard.
<i>The Panel recommends a different overarching strategy IF the impacts on the Corso in terms of overshadowing is minimised.</i>	The proposal generally adopts the panels recommended strategy (while also achieving the NBC heritage advice regarding both retention of the light wells and existing internal layouts) and results in an outcome that minimises overshadowing to The Corso.
<i>A sensitive response to the public domain of the Corso should be given priority over numerical compliance with ADG guidelines, while increasing amenity of dwellings</i>	Additional overshadowing of the Corso is negligible, consistent with the Panels advice. Refer to the discussion on Solar Access, below. Amenity of dwellings has been significantly enhanced with a significant improvement of 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24
<i>Consider completely removing internal walls including light wells. Replace the long narrow lightwells with one dissecting both sites</i>	This recommendation contradicts the Council’s heritage specialist advice that <i>The external facades should be retained as existing and restored as necessary, including the light wells on both sides (Reiterated in the PLM2021/0234 30 September 2021 by NBC Brendan Gavin)</i> . The scheme balances these competing interests by: <ul style="list-style-type: none"> <li>expanding the existing light wells on each side. On the eastern side the existing light well is repositioned and expanded dissecting 23 The Corso</li> <li>replanning apartment layouts to provide additional amenity through increased access to natural light and ventilation, while ensuring that acoustic amenity is not compromise</li> </ul>
<i>Consider range of units including single aspect</i>	A range of dwelling sizes, layouts and aspects are proposed to create diversity in the living environments.



<b>Landscape</b>	
<i>Consideration should be given to t a common area terrace on the roof. If this requires additional height, this could be acceptable if located to minimise visual and overshadowing</i>	Adopted. Accessible communal open space is now located on rooftop. Visual and overshadowing impacts are negligible as a result of the configuration of this space.
<b>Landscape/Terrace.</b>	
<i>Relocate from current location on L3 to roof top</i>	Adopted. Accessible communal open space is now located on the rooftop with a carefully considered landscape design that focuses on maximising solar access, while balancing shading opportunities to ensure year round enjoyment, as well as variation in the spaces to encourage diverse user groups.
<i>Provide more balcony's of larger size.</i>	Additional balconies, larger balconies and terraces have all been introduced. This includes to the Corso side and these are designed so as not to compromise the heritage integrity of the site.
<b>Amenity</b>	
<i>Natural light to lobbies</i>	Adopted. Natural light is provided to all lobbies
<i>Avoid sealed windows</i>	Adopted. Windows are operable
<i>Greater separation between habitable rooms</i>	Adopted
<i>Improve outlooks</i>	Adopted
<i>Avoid snorkel bedrooms</i>	Adopted where practicable
<b>Sustainability</b>	
<i>Rainwater recycling</i>	Refer Basix and Section J reporting prepared by Credwell
<i>Storage for bikes and boards</i>	Refer Basix and Section J reporting prepared by Credwell
<i>Passive design</i>	The outcome also represents a significant improvement with 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24.
<i>Maximise vegetation</i>	Adopted. Vegetation has been provided both at roof level and within the eastern lightwell. Balconies and terraces provide additional vegetation opportunities for dwelling occupants, if they so choose.
<i>Cool roof</i>	Adopted with the introduction of solar panels and roof top vegetation
<i>Appliance selection</i>	Refer Basix and Section J reporting prepared by Credwell
<i>Roof top solar</i>	Adopted
<i>External windows to bathrooms</i>	Adopted where practicable
<b>Panel Conclusion</b>	
<i>Different overall planning strategy</i>	The current design balances the competing advice of the Panel and the Council's specialist heritage officer
<i>Complete redesign of internal layouts</i>	The current design balances the competing advice of the Panel and the Council's specialist heritage officer
<i>Breaching of height and FSR controls may be considered favourably if it results in</i>	The scheme results in significant additional amenity while impacts to the public realm are negligible.

*additional amenity and minimal additional impact*

The proposed scheme demonstrates Design Improvements through:

- restoration of the external façade and detailing assists addressing all matters that the subject of a current fire order
- making all dwellings accessible through the introduction of a lift
- improving amenity to individual apartments through reconfigured layout that seek to maximise natural light to habitable living spaces
- access to Roof top communal open space of which there is no such area in the existing building
- expansion of Market Lane façade openings which will provide additional light, ventilation, outlook and amenity for occupants of the proposed dwellings.
- The outcome also represents a significant improvement with 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24

The proposed scheme demonstrates Public Domain contributions through:

- proposing a building height that achieves the objective of the MDCP at Schedule 6, which recommends screening of the Council's public carpark, when viewed from Darley Road which states that *new building height is to be approx. 600mm below the sill height of the top floor windows of No. 21 to retain outlook from those windows but also to disguise the view of the Market Lane car park when viewed from Darley Rd.)*
- restoration of the heritage external façade and detailing
- reinstatement of the heritage façade design to 23 The Corso across the ground and first floors (with parapet above level 2)
- retail uses to Market Lane, adding to the activation of the laneway public realm by reducing the extent of building services to this frontage and increasing opportunities for passive surveillance over the street frontage
- affordability being addressed with the introduction of single aspect, 1 bed dwellings
- expansion of the Market Lane façade openings and the introduction of Juliet style balconies at the upper building floors, which will further activate the public realm of Market Lane with increased opportunities for passive surveillance, while also enhancing security and safety of the public along this frontage
- introduction of residential land use above the ground floor, together with additional balconies and roof top terraces to 23 The Coro, which will further activate the



	public realm of Market Lane with increased opportunities for passive surveillance, while also enhancing security and safety of the public along this frontage enhanced environmental improvements to the building, including through the introduction of solar panels to the roof top, which will reduce the overall carbon footprint.
<i>ADG compliance regarding amenity etc</i>	The outcome also represents a significant improvement with 100% of dwellings being cross ventilated and 75% achieving sufficient solar access as shown on DA 24.

## Agency Consultation

The following agencies have been consulted prior to lodgement of this DA as set out below.

**Table 5: Agency consultation undertaken by Applicant prior to lodgement of application**

Agency	Comments
Ausgrid	<p>Preliminary Consultation has been undertaken with Ausgrid via an Ausgrid accredited ASP design consultant SAAD Consulting regarding the development proposal.</p> <p>A preliminary application has been lodged to Ausgrid - Premises address: 19-23 THE CORSO, MANLY, Ausgrid AE Reference: 700007735</p> <p>The application response from Ausgrid concludes that:</p> <ol style="list-style-type: none"> <li>1. No. 19-21 and No. 23 are considered one Lot.</li> <li>2. The maximum supply we can have been 350A from the 400A fuse due to the current grading.</li> <li>3. The service mains cable needs to be protected during any demolishing works.</li> </ol> <p>Detailed design of, and application for, final HV supply arrangements associated with the proposal will be completed in consultation with Ausgrid at the Construction Certificate Stage.</p>
Sydney Water Sewer Infrastructure	<p>Preliminary consultation has been undertaken with a Sydney Water accredited coordinator, MGP, regarding the development proposal above Sydney Water's existing sewer trunk infrastructure.</p> <p>MGP were the Sydney Water accredited coordinator for the previous development proposal (DA 2019_512) for the then owners Hilrok Properties Pty Ltd. Aspects of DA 2019_512, including the proposed lift position, building height and the like) are very similar to the current DA.</p> <p>In March 2020, Meinhardt engineers undertook a detailed structural assessment of the DA 2019_512 scheme and concluded:</p>



	<p><i>We provide our findings in the role of S4 verifier on the structural design of the footings for the proposed alterations and additions for the above mentioned project in relation to the existing Sydney Water sewer culvert located in this site. More specifically our review is to verify that the proposed design does not cause additional loads on the sewer culvert.</i></p> <p><i>In our review we find that the proposed design does not cause additional loadings onto the existing sewer culvert.</i></p> <p>MGP advise that in relation to the current application scheme prepared by DBJ Architects that, with the use of screw piles founded at a level below the SW sewer, that a separation of 1 - 1.5m from the sewer wall (to the closest screw pile) is capable of approval by SW, subject to detailed engineering and technical justification at the Construction Certificate Stage.</p>
<p>Sydney Water Fire Service Pressure &amp; Flow Enquiry</p>	<p>The applicant has lodged a Pressure &amp; Flow Application Number: 1368854 to Sydney Water dated 2022-03-14.</p> <p>A pressure and flow enquiry response has been provided by Sydney Water and demonstrates that sufficient pressure and flow within the existing surrounding mains is available to cater for the Fire Service components of the proposed development without the need for pumps or tanks to supplement the water supply to the site. Therefore, there is no requirement for a dedicated fire pump room, tanks or similar to service the proposed development.</p> <p>Detailed design will be completed in consultation with the Sydney Water Coordinator at the Construction Certificate Stage.</p>



## SECTION 4.15 EVALUATION

This application is required to consider section 4.15 of the Environmental Planning & Assessment Act 1979 (EP & A Act), the provisions of which are set out and addressed below.

Table 6: Section 4.15 of EP & A Act

Clause No.	Title/Clause	Comment
4.15	Evaluation	
(1)	<b>Matters for consideration—general</b>	
	In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:	
	(a) the provisions of:	
	(i) any environmental planning instrument, and	<ul style="list-style-type: none"> <li>○ State Environmental Planning Policy (Building Sustainability Index) 2004 (SEPP BASIX)</li> <li>○ State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development (SEPP 65)</li> <li>○ State Environmental Planning Policy (Resilience and Hazards) 2021 (SEPP Resilience and Hazards)</li> <li>○ LEP</li> </ul> <p>The proposal is considered below having regard to these requirements. These matters are considered in Appendix 1.</p>
	(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	Not applicable.
	(iii) any development control plan, and	Manly Development Control Plan 2014 (DCP)
	(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	Not applicable.



Clause No.	Title/Clause	Comment
	(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and	Not applicable.
	(v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979),	Not applicable.
	that apply to the land to which the development application relates,	
	(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	<p>Matters of environmental impact have been addressed extensively in this report. The proposed development has been considered having regard to matters of acoustics, heritage, structure and BCA compliance and will not result in any adverse impacts on the built or natural environment. The works are generally contained within the existing building and will result in some additional floor space to enhance the residential offering within a highly accessible location, with the focus of access to the site being on the use of public transport, walking and cycling, thus representing an environmentally sustainable approach to the use of the land. Further, the retention of the existing structures and adaptive reuse of the existing building, further enhances the environmentally sustainable outcomes attached to this development. The retention of the key heritage elements of the building has been at the forefront of the design response, using these elements to guide the balance of site redevelopment.</p> <p>In terms of social and economic impacts, the proposal will enable additional accommodation in an accessible location. This will aid the economic integrity of the site, to ensure its ongoing viability, while also continuing to provide employment generation through the retention of retail space at the ground floor.</p> <p>The proposed mitigation measures and performance solutions that are to be incorporated into the building design will assist the consent authority in ensuring that the amenity of the development itself and of properties proximate to the site will be retained and enhanced as part of this application.</p>





Clause No.	Title/Clause	Comment
	(c) the suitability of the site for the development,	The continued use of the site for retail and residential purposes, with a minor increase in density, will remain a suitable use for the site, per both the existing situation and having regard to the site's context, which comprises both residential and non-residential uses. Suitable mitigation measures are incorporated into the design to ensure that the amenity of the building is enhanced over the existing situation, thus making for an improved outcome over the existing circumstance.
	(d) any submissions made in accordance with this Act or the regulations,	Should submissions be made during the course of assessing this application, the Applicant would be willing to respond to these accordingly.
	(e) The public interest.	<p>As demonstrated throughout the report, the proposal does not present any issues that are contrary to the public interest. The proposed use remains permissible within the zone and the works to the building will enhance the integrity of the important elements of the building, while providing new building forms to compensate, in part for the costs of preservation of the existing building, thus retaining the importance of the building to the historic streetscape of The Corso.</p> <p>The design of the proposed works will enhance opportunities for passive surveillance over both of the street frontages from the residential levels and the retention of retail space at the ground floor of The Corso, and the addition of a new retail tenancy to the rear of the building, facing Market Lane will also enhance the passive surveillance opportunities and active street frontages of the development.</p> <p>The continued reliance of development on walking, cycling and public transport also upholds the environmental sustainability elements of utilising the site, as does the reuse of the existing building, thus reducing the carbon footprint of what would otherwise result if full demolition of the building were to occur.</p>



Clause No.	Title/Clause	Comment
		As such, the proposed development is well within the public interest and should be supported.

## Key Issues, EPI & DCP Considerations

### *Heritage*

A Heritage Impact Statement accompanies this development application and provides detailed consideration of the heritage attributes of the site and assesses the impacts of the proposed development in heritage terms.

Aside from the additional building height proposed above 23 The Corso, which is addressed below in relation to Building Form, a range of other matters are addressed below in terms of the impact of the proposal on both the heritage item and the conservation area.

#### **Works are not to detract from or significantly alter the heritage significance of an item or conservation area**

*The proposed works will involve partial demolition of internal elements including non-load bearing walls, staircases, doors, windows along the northwest and southeast elevation (at upper levels) and slab (to include a central lift) and addition of a central lift lobby with lift and staircase, new expanded lightwell, addition of three storeys at 23 The Corso and communal spaces.*

*The new works will not utilise colouring or finishes that attract undue attention or detract from the significant remnant heritage fabric. The timber windows at the south-eastern façade have rotted due to weathering and are no longer operable. Hence, like-for-like replacement is proposed for the timber framed single hung windows located at the primary elevation of 19-21 The Corso, Manly.*

*Significant fabric within the subject site will remain largely unaffected under the proposed works while creating better functioning interiors and configuration for its future occupants, thus improving the liveability and amenity of the apartments.<sup>9</sup>*

#### **Contemporary responses are not to replicate heritage details**

*The subject site is located within the Town Centre Heritage Conservation Area and in the centre of The Corso, a low scale pedestrian throughfare linking the harbour (Manly Wharf) to the ocean (Manly Beach). The proposed works are minimal in the context of the streetscape of The Corso maintaining opportunity*

<sup>9</sup> Heritage Impact Statement, City Plan Heritage, Page 19



*for further heritage interpretation available in the surrounding public domain, along The Corso façade, and within the Market Lane secondary frontage including creation of an active building façade with treatment similar to that of the front façade of the building.<sup>10</sup>*

### **Significant views to and from the heritage item are to be retained**

*In its current form, the subject site (19-23 the Corso, Manly) features views toward the east and south. Views to and from the south and southwest are considered to be the most significant in providing visual links between the subject site and The Corso.*

*The proposed works involve no changes to the façade other than like-for-like replacement of the timber windows at the front elevation, so no significant views, to and from the heritage items will be impacted. With the addition of two storeys recessed from the building line of 23 The Corso, the view to the heritage items will be unaffected while improving the visual curtilage and streetscape presentation towards the multi-level carpark located behind the subject site by reducing its visibility from The Corso.<sup>11</sup>*

In relation to the replacement of the existing roof over 19-21 The Corso the existing gabled roof will be replaced with a flat roof form. The existing roof is not visible from the streetscape or public domain and the cladding on the existing roof form is not of significance, such that the benefit of the communal terrace, which provides a benefit to the development proposal is warranted. Most importantly *the replacement of the roof will have minimum impact on the significance and streetscape presentation of the heritage item.<sup>12</sup>*

In terms of the item's presence to both street frontages, the following is provided:

*The subject site has a rendered façade with original brackets, lintels, and mouldings. The proposed works will ensure that these elements remain essentially the same, however the single hung timber windows along the south-eastern façade will be replaced with similar specifications to match the existing windows as they have started to rot and are generally non-operable.*

*The rear elevation of the subject site has no original elements and have metal framed windows. The proposed works involves replacement of those windows with contemporary material that aligns with the colour scheme and material configuration of the heritage item and the items in the vicinity and have no impact on their heritage significance. Creation of an active street façade to the rear of the building is*

---

<sup>10</sup> Heritage Impact Statement, City Plan Heritage, Page 20

<sup>11</sup> Heritage Impact Statement, City Plan Heritage, Page 21

<sup>12</sup> Heritage Impact Statement, City Plan Heritage, Page 22

*considered as a positive aspect of the proposed development and is consistent with the treatment of facades along the Market Lane and Sydney Road intersection.*<sup>13</sup>

Having regard to the limited impacts that the proposal will have on the heritage significance of the item and its location in the heritage conservation area, the conclusion of the Heritage Impact Statement is as follows:

*In conclusion, it is considered by City Plan Heritage that the proposed works, including partial demolition of remnant non-structural internal features, demolition of the roof of 19-21 The Corso, and addition of two storeys over 23 The Corso, as well as the proposed residential, retail and Hotel stratum/strata subdivision will result in no adverse impacts to the heritage significance of The Ivanhoe Hotel, its group commercial heritage buildings and the Town Centre Heritage Conservation Area or the nearby heritage items. The shop front at 19-21 The Corso will continue to contribute to the active use of street level and the additional storeys will provide a new, contemporary addition to the site without compromising the prominence of the heritage item(s) in its streetscape. The proposed design for the additional storeys will be readily identifiable and complement the form, scale, and character of the adjoining apartment building (19-21 The Corso) and commercial buildings in the vicinity.*

*The following recommendations have been made to ensure the assessed heritage values of the subject site, and its layered history is conserved and communicated to its future users:*

- ✦ *A Schedule of Conservation Works should be prepared to guide the repair, maintenance and preservation of the original fabric of the subject site.*
- ✦ *A temporary protection plan should be prepared to ensure all retained original fabric is protected during works and to guide the protection of the surrounding heritage items during the construction works;*
- ✦ *A built heritage specialist should be involved and be on site during all critical processes that require specialist heritage expertise and detailing; and*

*The proposal demonstrates compliance with the existing controls regarding heritage conservation contained in the Manly LEP 2013 and Manly DCP 2013, maintaining the intent of enhancing the streetscape qualities along The Corso while providing additional contemporary accommodation in Manly. Therefore, approval of the application is recommended to the Northern Beaches Council.*<sup>14</sup>

The proposed development is therefore acceptable in heritage terms.

<sup>13</sup> Heritage Impact Statement, City Plan Heritage, Page 23

<sup>14</sup> Heritage Impact Statement, City Plan Heritage, Page 27

*Building Form*

The MDCP provides a level of concession in relation to building form at Schedule 6 for 23 The Corso, which states as follows:

23 The Corso	Shop (with No. 21)	<ul style="list-style-type: none"> <li>• redevelopment may be considered subject to heritage assessment.</li> <li>• new building height is to be approx. 600mm below the sill height of the top floor windows of No. 21 to retain outlook from those windows but also to disguise the view of the Market Lane car park when viewed from Darley Rd.</li> <li>• ducting at south corner at 1st floor level should be removed or relocated.</li> </ul>
-----------------	--------------------	---

The view of the Market Lane car park is best evidenced in the photograph below, showing its prevalent position above 23 The Corso, along with the approximate 600mm below sill height of No. 21 transposed across No. 23.

**Photograph 1: View of Market Lane car park from Darley Lane, looking north and approximate sill height transposed across No. 23**



As evidenced on the photomontage below, the proposed addition to No. 23 takes advantage of this height with a new Level 2 proposed on top of the existing building form. However, as evidenced by Photograph 1, this does not screen the unsightliness of the Market Lane car park. Therefore, a second, additional, storey is proposed set back atop 23 The Corso to remove the unsightly view of this, being positioned to avoid impact onto The Corso in terms of built form and overshadowing, but taking the opportunity to significantly improve the streetscape condition that is otherwise derived from the unsightly car park.



Photograph 2: Photomontage of proposed development, which includes screening of the existing car park to the rear of the site, the visibility of which will be significantly reduced by the proposed development (Source: DBJ Architects)



The recessive design that is proposed for the third floor will not compromise the heritage attributes of The Corso, as addressed in the Heritage Impact Statement, as follows:

*The proposed works further include addition of two storeys above 23 The Corso with no changes to the already approved scheme for façade reinstatement. The proposed floors will be recessed from the building line at first and second floors and the third level has a front extended balcony, shifting the building mass towards the centre of the building with the new light-well in between the bedrooms of the*



*top floor units over 19-21 The Corso. As the additional storeys are recessed from the front building line, it does not detract or significantly alter the heritage significance of any heritage items or conservation area in the vicinity.*<sup>15</sup>

The Heritage Impact Statement also states that:

*The proposed works will not include detracting additions or alterations that may negatively impact the character of the existing building and the surrounding area. The proposal will ensure that the significant built fabric is retained.*<sup>16</sup>

and

*... the new addition above 23 The Corso and to the interior of the subject site will include new materials and finishes aligning with the existing colour scheme, in keeping with the styles of similar retail shopfronts and apartment buildings in the surrounding area.*<sup>17</sup>

The Heritage Impact Statement also reinforces the importance of this additional building form in heritage terms, as follows:

*With the addition of two storeys recessed from the building line of 23 The Corso, the view to the heritage items will be unaffected while improving the visual curtilage and streetscape presentation towards the multi-level carpark located behind the subject site by reducing its visibility from The Corso.*<sup>18</sup>

and

*The proposed works primarily involve internal alterations and additions to the building and the proposed two storeys above 23 The Corso is recessed from the existing building line to maintain the current street alignments. The addition of two storeys complements the scale of the building as the subject site is lower than the adjoining medium density development and the third floor is well setback presenting essentially a three-storey bulk to The Corso partially obscured behind the approved new façade and parapet of 23 The Corso. The proposed storeys will not replicate the existing heritage details and character of the significant buildings and the design follows a contemporary approach in terms of form, scale, detailing and materials.*

and

---

<sup>15</sup> Heritage Impact Statement, City Plan Heritage, Page 19

<sup>16</sup> Heritage Impact Statement, City Plan Heritage, Page 20

<sup>17</sup> Heritage Impact Statement, City Plan Heritage, Page 20

<sup>18</sup> Heritage Impact Statement, City Plan Heritage, Page 21



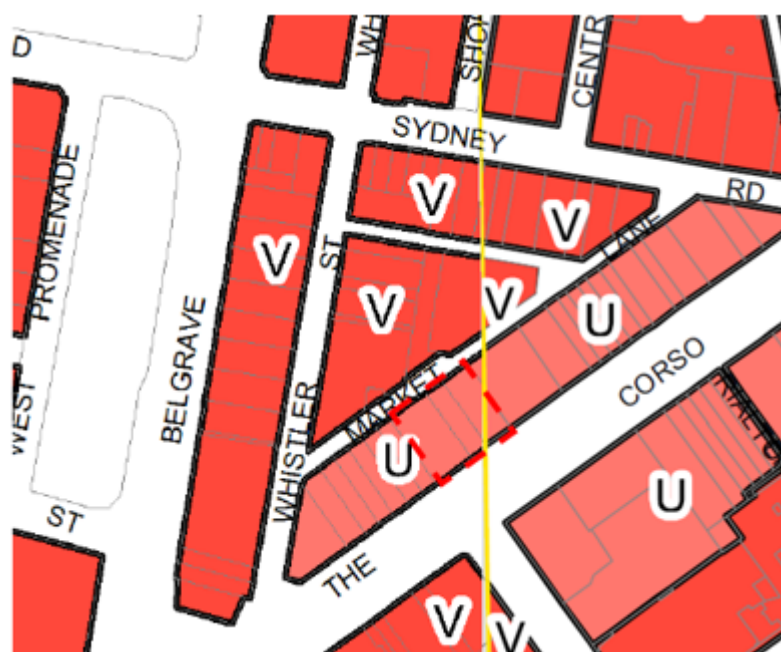
As noted earlier, a multi-level Council's car park is located behind the subject site on Market Lane and additional storeys will obstruct the view of the car park from The Corso. The proposal thus aligns with the council's vision to avoid direct views of the car park from The Corso.<sup>19</sup>

Given that the MDCP encourages a building form that reduces the visibility of the existing car park and the impact of this additional form, including that which exceeds the additional height over and above that specified at Schedule 6, the design outcome is a contemporary approach which complements the existing heritage characteristics of the site, while improving the overall streetscape of The Corso, particularly when looking north from Darley Road. In addition, and discussed below, this additional height has a negligible impact in terms of overshadowing over The Corso that warrants support of this additional form in the interests of providing a more appropriate streetscape.

#### *Floor Space Ratio*

Cl. 4.4 of the MLEP prescribes a maximum floor space ratio for the subject site of 2.5:1. This floor space ratio may be increased to 3:1 in the B2 Local Centre zone where the consent authority is satisfied that at least 50% of the building will be used for commercial purposes (cl 4.4(2A)).

Figure 7: Floor space ratio - 2.5:1



The proposed gross floor area of the development is 2.52: 1, with 1,739m<sup>2</sup> (60.9%) of the total site area used for commercial purposes. As such, the proposed development complies with cl 4.4 of the MLEP.

The calculation of gross floor area is shown on DA-24.

<sup>19</sup> Heritage Impact Statement, City Plan Heritage, Page 22



### Building Height

The permitted building height is 10m.

The existing building height at the highest point, fronting The Corso, is 15.84m; at the rear fronting Market Lane, the highest point on the building is RL 18.28, being 12.68m.



Figure 8: Height of buildings – 10m

The proposed building height to the top of the new parapet ranges between 14.77m (The Corso) and 14.78m (Market Lane). In addition, is the balustrade enclosing the common open space area, to RL 21.38 (15.33m); the fire stair, RL 23.00 (16.95m) and to the top of the lift overrun, RL24.58 18.53m).

The extract of the building sections, below, demonstrates those parts of the building, where increased height is proposed over the existing situation.

The non-compliance with the development standard for height of buildings is addressed in the variation pursuant to cl. 4.6 of the MLEP, accompanying this application.

### Visual Privacy & Separation

The proposed works have been designed to ensure that visual privacy and adequate separation is retained both within the development itself and to neighbouring properties. This has been achieved utilising the following design techniques:

- all openings that directly align the north-eastern and south-western property boundaries are enclosed to avoid overlooking onto the neighbouring properties that are immediately adjacent
- where openings are proposed to highly trafficable areas, such as the stairwell on the eastern side of the building, frosted glazing is proposed at the upper floors
- at Level 1, where the apartments intersect with a garden area separating A1.02 and A1.03, these are separated by a 12m distance, with a dividing wall between the two areas, thus consistent with the ADG separation requirements to habitable areas
- at Level 2, the eastern apartments A2.02 and A2.03 interact across a light well, separated by a distance of 12m, with a marginal encroachment of a balcony on the northern face of A2.03, which is 2m deep and accessible via sliding doors from the bedroom. A low height window is proposed to the

- kitchen in A2.02 to enable light into that space, but below standard eye height such that overlooking directed towards the balcony at A2.03 would occur and vice versa
- at Level 3, a 9m separation distance is retained, with A 3.02 and A3.03 interfacing with bathrooms, deemed non-habitable spaces, thus the separation distance being appropriate
- on the western side of Level 1 and 2, those openings facing into the lightwell interact with an existing building, constructed to the boundary, at 17 The Corso, such that there is no additional requirement for increased separation or privacy treatment as there are no openings on the adjoining property and the existing building edge is being retained. At Level 3, the building is existing despite being above the height of the neighbouring building to the west at this point. In all cases, the existing openings are being retained and, in some bases, reduced in depth, to respond to the use of the enclosing room, namely where a bathroom is proposed, such that highlight windows are instead provided. Therefore, there are no additional openings or impediments to visual privacy across this lightwell to the existing property and, in some cases, the privacy treatment is improved over the existing situation
- at the roof top level, a communal open space area is provided on top of 19-21 The Corso, set back 12m from The Corso and 4m from the Market Lane frontage. The communal open space area, from the southern side, when standing on The Corso, looking north-west has no visibility as this is entirely screened by the roof plant and equipment. Similarly, from Market Lane, the visual privacy of the communal open space area will not be impeded as the height of the building proper intersects the plane of visibility well before the open space area.

Based on the above, there are sufficient design techniques, in conjunction with separation distances between building elements to ensure that there is adequate visual privacy retained within the development, and having regard to neighbouring properties.

### *Solar Access*

As detailed above, the additional building height has been designed on 23 The Corso as prescribed by Schedule 6 of the MDCP, which encourages additional height to sit 600mm below the sill height of the top floor window of No. 21 to enable outlook from these windows, while also disguising the view of the Market Lane car park which sits to the north of the site.

The solar access diagrams demonstrate that, by increasing the building height in accordance with the above, the proposed built form will have the following impacts:

- at 9am at the winter solstice, there will be an additional 2m<sup>2</sup> of shadow over the footpath and roadway of The Corso (shown in pink on DA-22)
- at 12 noon at the winter solstice, there will be an additional 14m<sup>2</sup> of overshadowing to The Corso, approximately two-thirds of which falls across the roadway (also shown in pink on DA-22)



- at 3pm, there will be an additional 25m<sup>2</sup> of overshadowing which falls, in part over the pedestrian area of The Corso and, in part, over the façade of St Matthews, Manly, located at 1 Darley Road, to the south of the site (Figure 3). The additional shadow caused, as shown on DA-22 is predominantly on the existing landscaped area in front of the Church and blank sections of wall, facing The Corso (Figure 4). The shadow does not, however, affect the window openings on the northern face of the Church.



Figure 9: St Matthews Manly, located on the southern side of The Corso, opposite the site, at 1 Darley Road

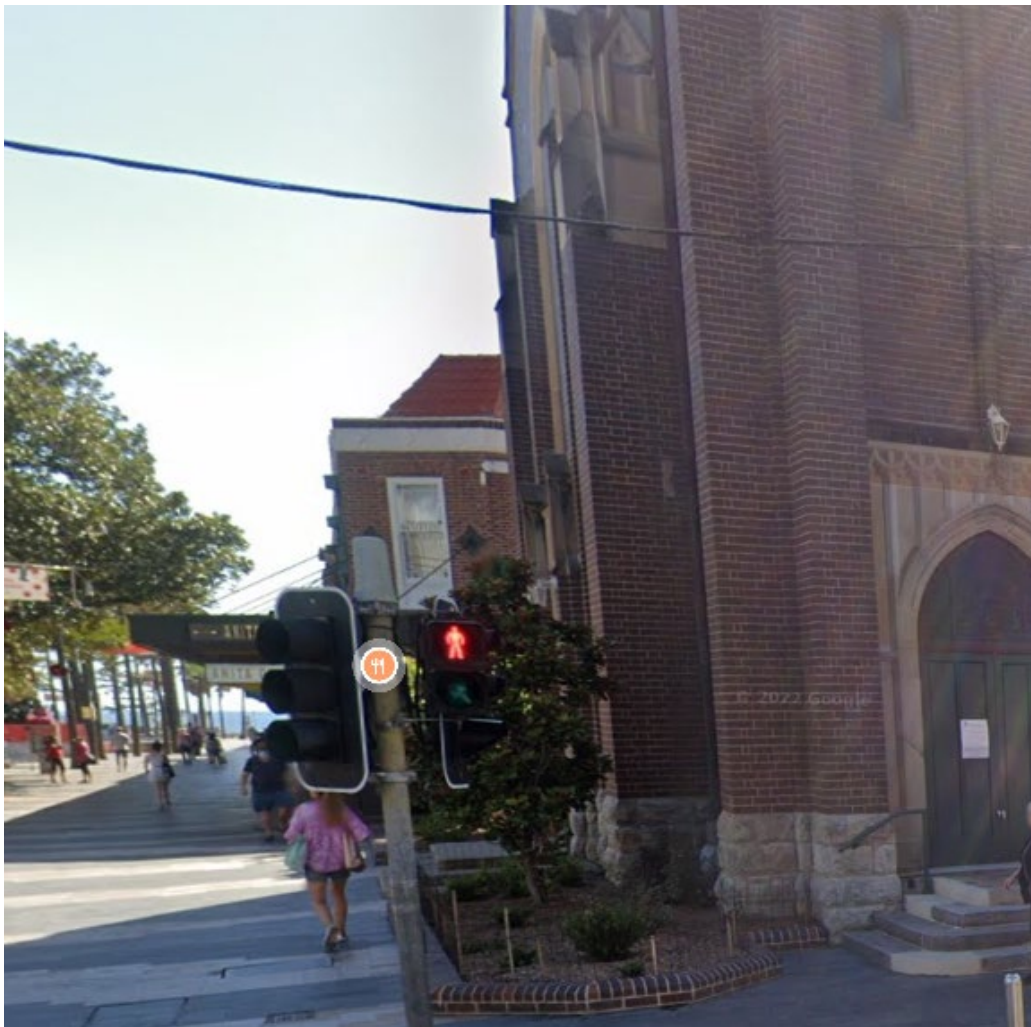


Figure 10: Existing landscaping, located on the northern wall of St Matthews Church



**Figure 11: Elevational shadow diagram demonstrating impact of the proposed building height, as directed by the MDCP, on the existing window opening to St Matthews Church**



Therefore, if one is to adopt the direction provided in the MDCP to raise the building height at 23 The Corso to screen the car parking station on Market Lane, this minor increase in shadow is deemed appropriate and without adverse impact.

As demonstrated on the plans, there is also an additional building form proposed on Level 3 that is set back from The Corso by 5.5m. This positioning ensures that the additional height has limited visibility from The Corso, and is discussed above. In terms of overshadowing, the proposed form results in a very minor additional increase in shadowing at 3:00pm on June 21 by 8m<sup>2</sup>, with no additional impact at any other time, as evidenced on DA-22. The impact that derives from this is across the landscaping and a blank section of wall to the northern frontage of St Matthews Church and is considered to be of no consequence, such that the additional building height, from an overshadowing perspective, should be supported.

**Figure 12: Additional overshadowing shown in orange that is caused by the additional building height proposed on 23 The Corso, recessed from the property boundary by 5.5m. This falls on existing landscaping and a blank section of wall of St Matthews Church**



### *Sustainability Measures*

The proposed development is subject to both SEPP BASIX and Section J requirements. In addition, the proposed development initiates the following sustainability initiatives to reduce the impacts of this, during both construction and, upon completion of, the proposed works:

- reduce overall embodied carbon, material to landfill and material consumption generally through adaptive reuse of the existing concrete structure (where practicable) in lieu of its demolition and replacement
- reuse of the existing building to reduce traffic, noise and vibration impacts as a result of reduced required construction related vehicular movements to and from the site and overall reconstruction impacts more generally, including noise, dust and vibration
- replacement of existing building services which are aged and subject to compliance action by the Council, as it relates to fire services, ensuring occupant safety within the building is materially improved over the existing situation
- providing a design outcome that responds to the significant constraint of the existing Sydney Water Sewer Main running beneath the existing building which precludes basement construction and requires a comprehensive design solution to be developed to avoid impacts to this as a result of any inground works required
- retaining the focus of public transport, walking and cycling to and from the site, by continuing the existing condition of not providing on-site car parking, thus reducing the carbon footprint otherwise attached to vehicular movements to and from the site
- incorporation of requirements as required by Section J and BASIX requirements (refer to separate reports) to enhance the environmental and operational aspects of the building, thus improving environmental performance
- the retention and use of internal light wells and void spaces to maximise the amenity of internal spaces within each apartment, thus reducing reliance on artificial sources, while not being reliant upon these for that same purpose.
- retention of sufficient non-residential floor space within the development to ensure that localised employment opportunities and commercial floor space is retained, consistent with the B2 Local Centre zone, that will not only service local needs of people living in, working and visiting the area, but also to provide employment in an accessible location, in terms of pedestrians, cycling and public transport access, thus reducing reliance on private motor vehicles
- provision of solar panels across the southern side of the rooftop to minimise energy usage within the development.

### *Crime Prevention*

The applicant has considered crime prevention initiatives in developing the DA architectural scheme, which include the following:

- Relocation of the residential apartment building address to Market Lane to enhance laneway activation to this frontage, increase passive surveillance to the public realm and provide separation between the existing pub use and residential users of the site.



- the existing, and expanded, western light well remains open on four sides, with the exception of Level 1, which continues the existing opportunity for passive surveillance of the public realm from the site, when viewed internally from these levels
- introduction of a roof top terrace communal space which will increase opportunities for passive surveillance over the public realm
- introduction of retail activation to Market Lane adding to laneway activation, increasing passive surveillance over the public realm and reducing opportunities for concealed spaces within the building frontage
- expansion of the Market Lane façade openings and the introduction of Juliet style balconies to the northern façade which will enhance passive surveillance opportunities over Market Lane and improve safety and security within the public realm of this space
- introduction of additional residential land use above the ground floor, together with additional balconies and roof top terraces to 23 The Coro, which will assist in enhancing passive surveillance opportunities over Market Lane, as well as improving safety and security within the public realm of Market Lane
- the residential elements of the building, including the lift and the roof top terrace will be accessible only via security system access. CCTV will be provided to residential common areas.



## CONCLUSION

---

The proposed development the subject of this application seeks consent for development application for substantial alterations and additions to part of the existing buildings on the site, to allow for the adaptive reuse of these, along with stratum and strata subdivision of the land, known as 19-29 The Corso, Manly.

The proposal will include new retail spaces at the ground floor of 19-21 The Corso and building services. At the three upper building levels of 19-23 The Corso, these will be reconfigured to accommodate twelve apartments, being nine, two-bedroom apartments and three, one-bedroom apartments. Each apartment will be provided with a new balcony or wintergarden to provide outdoor living space, which is not currently availed to the residential component of the building. Existing light wells will be enhanced to increase amenity and natural light into what are, existing, substandard residential dwellings. New private open space areas will also be provided to the eastern apartments. A communal roof top area is proposed on the top of 19-21 The Corso for communal open space purposes.

The existing strata building, which is currently not accessible, will also be upgraded to enable compliant building services, fire stair and lift arrangements.

The existing strata building, which is the subject of Fire Order No EPA2020/0234, will also be upgraded to enable compliance.

The proposed represents a sustainable approach to reuse of an existing building, with strong design attributes that take account of the heritage fabric of the site, while balancing this with contemporary elements to ensure that there is a comfortable juxtaposition between the building elements. The proposal continues the existing condition of the site, with no on-site parking, thus focusing on walking, cycling and public transport as the means of access to and from the site. The design ensures that there are significant improvements to the public domain, with the building identifying clearly with each of its frontages and avoiding a front and back. This results in a strong response that encourages street activation to both street frontages. The design of window openings, as well as roof top communal open space ensures that additional opportunities for passive surveillance and activity are evident.

The proposal is also within the public interest by providing a built form outcome that endeavours to substantially screen the visual imposition of the existing car parking station, which forms an unsightly element to the streetscape of The Corso, thus providing a material improvement to the public domain. While this results in non-compliance with the development standard for building height, it provides a strong public benefit, with a design outcome that is comfortably proportioned to the balance of the building and the streetscape as a whole.

The proposed development is therefore sensitively designed in its context and should be supported by the Council, subject to relevant conditions of development consent.



# APPENDIX 1: ENVIRONMENTAL PLANNING INSTRUMENT ASSESSMENT

---





## STATE ENVIRONMENTAL PLANNING POLICY (SEPP) RESILIENCE & HAZARDS

Control	Comment	Compliance
<b>4.6 Contamination and remediation to be considered in determining development application</b>		
(1) A consent authority must not consent to the carrying out of any development on land unless—		
(a) it has considered whether the land is contaminated, and	<p>There is no change in land use under the proposal. 19-23 The Corso is Shop Top housing. The proposal retains shop top housing.</p> <p>Therefore a preliminary site investigation has not been undertaken to accompany this development application.</p> <p>In reviewing the Heritage Impact Statement, the previous uses of the land appear to comprise commercial shops (chemist), a photography shop and residential uses.</p> <p>These uses are not likely to have resulted in contamination of the land.</p> <p>Further, a detailed site investigation cannot be undertaken given the extent of building form on the land which precludes drilling.</p>	
(b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and	Refer above	

Control	Comment	Compliance
(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.	Refer above	
(2) Before determining an application for consent to carry out development that would involve a change of use on any of the land specified in subsection (4), the consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned carried out in accordance with the contaminated land planning guidelines.	Refer above	
(3) The applicant for development consent must carry out the investigation required by subsection (2) and must provide a report on it to the consent authority. The consent authority may require the applicant to carry out, and provide a report on, a detailed investigation (as referred to in the contaminated land planning guidelines) if it considers that the findings of the preliminary investigation warrant such an investigation.	This is not considered necessary based on the historical uses.	
(4) The land concerned is—		
(a) land that is within an investigation area,		NA
(b) land on which development for a purpose referred to in Table 1 to the contaminated land planning guidelines is being, or is known to have been, carried out,	The historical uses of the property are not listed on Table 1.	NA
(c) to the extent to which it is proposed to carry out development on it for residential, educational, recreational or child care purposes, or for the purposes of a hospital—land—		
(i) in relation to which there is no knowledge (or incomplete knowledge) as to whether development for a purpose referred to in Table 1 to the contaminated land planning guidelines has been carried out, and	As the historical uses are not subject to Table 1 and the existing use of the property is predominantly for residential purposes, the knowledge is considered complete, subject to further consideration by the consent authority.	NA
(ii) on which it would have been lawful to carry out such development during any period in respect of which there is no knowledge (or incomplete knowledge).	As above.	NA



## STATE ENVIRONMENTAL PLANNING POLICY NO. 65 – DESIGN QUALITY OF RESIDENTIAL APARTMENT DEVELOPMENT

Assessment Criteria	Assessment	Compliance
<b>Clause 4 Application of Policy</b>		
<p>(1) This Policy applies to development for the purpose of a residential flat building, shop top housing or mixed use development with a residential accommodation component if—</p> <p>(a) the development consists of any of the following—</p> <p style="padding-left: 20px;">(i) the erection of a new building,</p> <p style="padding-left: 20px;">(ii) the substantial redevelopment or the substantial refurbishment of an existing building,</p> <p style="padding-left: 20px;">(iii) the conversion of an existing building, and</p> <p>(b) the building concerned is at least 3 or more storeys (not including levels below ground level (existing) or levels that are less than 1.2 metres above ground level (existing) that provide for car parking), and</p> <p>(c) the building concerned contains at least 4 or more dwellings.</p>	<p>The proposed development involves adaptive reuse of an existing building with new building works for residential purposes proposed at 23 The Corso.</p> <p>The building is also more than three storeys and contains more than four dwellings.</p> <p>As such, SEPP 65 applies to this application.</p>	Yes
<b>Clause 28 Determination of development applications</b>		
<p>1) After receipt of a development application for consent to carry out development to which this Policy applies (other than State significant development) and before it determines the application, the consent authority is to refer the application to the relevant design review panel (if any) for advice concerning the design quality of the development.</p>	<p>This is the responsibility of the consent authority.</p>	Note
<p>2) In determining a development application for consent to carry out development to which this Policy applies, a consent authority is to take into consideration (in addition to any other</p>		



Assessment Criteria	Assessment	Compliance
matters that are required to be, or may be, taken into consideration)—		
a) the advice (if any) obtained from the design review panel, and	<p>The application was the subject of a design review panel meeting prior to lodgement of the DA on 23 September 2021.</p> <p>It is assumed that the DA will be forwarded to the Council’s Design Sustainability Advisory Panel during assessment of this DA.</p>	Yes
b) the design quality of the development when evaluated in accordance with the design quality principles, and	An evaluation of the design quality principles has been undertaken by DBJ Architects.	Yes
c) the Apartment Design Guide.	The compliance of the proposed development with the Apartment Design Guide (ADG) is addressed by DBJ Architects.	Yes
3) However, if the relevant design review panel fails to inform the consent authority of its advice concerning the design quality of the development to which this Policy applies within 14 days after its first meeting to deal with the application concerned, the consent authority may determine the development application without considering any such advice and a development consent so granted is not voidable on that ground.		Note
(4) The 14-day period referred to in subclause (3) does not increase or otherwise affect the period within which a development application is required to be determined by a consent authority.		Note
(5) A consent authority is not required to obtain the advice of a relevant design review panel under subclause (1) if an architectural design		NA



Assessment Criteria	Assessment	Compliance
competition that is consistent with the Design Excellence Guidelines has been held in relation to the proposed development.		
<b>30 Standards that cannot be used as grounds to refuse development consent or modification of development consent</b>		
(1) If an application for the modification of a development consent or a development application for the carrying out of development to which this Policy applies satisfies the following design criteria, the consent authority must not refuse the application because of those matters—		
(a) if the car parking for the building will be equal to, or greater than, the recommended minimum amount of car parking specified in Part 3J of the Apartment Design Guide,	As the site is located in a B2 Local Centre zone, and is not within the vicinity of a higher order commercial zone, this is not applicable.	NA
(b) if the internal area for each apartment will be equal to, or greater than, the recommended minimum internal area for the relevant apartment type specified in Part 4D of the Apartment Design Guide,	All apartments exceed the minimum internal area requirements.	Yes
(c) if the ceiling heights for the building will be equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide	In some cases, the ceiling heights are less than that specified in the ADG as a result of existing floor levels noting that the proposal, in part, encompasses the adaptive reuse of existing structure at 42 North Steyne and thus retains existing floor levels.	No
(2) Development consent must not be granted if, in the opinion of the consent authority, the development or modification does not demonstrate that adequate regard has been given to—  (a) the design quality principles, and	These matters are addressed at Appendix 4 and 5.	Yes



Assessment Criteria	Assessment	Compliance
(b) the objectives specified in the Apartment Design Guide for the relevant design criteria.		
(3) To remove doubt— (a) subclause (1) does not prevent a consent authority from refusing an application in relation to a matter not specified in subclause (1), including on the basis of subclause (2), and  (b) the design criteria specified in subclause (1) are standards to which section 4.15(2) of the Act applies.		Noted  Noted



## MANLY LOCAL ENVIRONMENTAL PLAN 2013

Development Standard	Control	Comment	Compliance
<b>Part 2 Permitted or prohibited development</b>			
2.1 Land use zones	B2 Local Centre	Shop top housing is permissible with development consent.	Yes
Zone Objectives	To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area.	The proposed development will provide for a range of retail and business uses that will serve the needs of people who live in, work in and visit the local area and retain the required floor space that is desired for development within the Manly Town Centre in the B2 Local Centre zone.	Yes
	To encourage employment opportunities in accessible locations.	The proposed uses will continue to provide local employment within the area.	Yes
	To maximise public transport patronage and encourage walking and cycling.	The proposed development retains focus on public transport, walking and cycling, with no car parking proposed on the site.	Yes
	To minimise conflict between land uses in the zone and adjoining zones and ensure amenity for the people who live in the local centre in relation to noise, odour, delivery of materials and use of machinery.	The proposal provides for a mixed-use development comprising of a food and drink premises and retail premises on the ground floor level and residential accommodation above. These issues of amenity are addressed in the Acoustic Impact Assessment.	Yes
2.6 Subdivision—consent requirements	Land to which this Plan applies may be subdivided, but only with development consent.	Development consent is sought for three strata, relating to the Ivanhoe Hotel, the proposed retail space and the residential apartments, as shown on the draft plans of subdivision. Strata subdivision of the individual residential apartments will also be required.	Yes



2.7 Demolition	The demolition of a building or work may be carried out only with development consent.	Consent is sought for demolition works as shown on the Demolition Plans prepared by DBJ Architects.	Yes
----------------	--	---	-----

#### Part 4 Principal development standards

4.1	1) This clause applies to a subdivision of any land shown on the Lot Size Map that requires development consent and that is carried out after the commencement of this Plan	The land is not subject to a minimum allotment size.	NA
	4) This clause does not apply in relation to the subdivision of any land— a) by the registration of a strata plan or strata plan of subdivision under the Strata Schemes Development Act 2015, or b) by any kind of subdivision under the Community Land Development Act 1989.		NA
4.3 Height of buildings	Maximum building height as per LEP map is: Area K = 10m Area M = 12m	Refer to Clause 4.6 Report	No
4.4 Floor space ratio	Maximum FSR as per LEP map is: Area U = 2.5:1 The maximum floor space ratio may be increased by 0.5:1, where 50% of the total floor space is used for non-residential purposes.	The proposed FSR is 2.52:1; the proposed commercial floor space occupies 60% of the total floor area.	Yes

#### Part 5 Miscellaneous provisions

5.10 Heritage conservation	2) Requirement for consent Development consent is required for any of the following—	Development consent is sought for partial demolition as set out in the Heritage Impact Statement.	Yes
	a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making		





	<p>changes to its detail, fabric, finish or appearance)—</p> <ul style="list-style-type: none"> <li>i. a heritage item,</li> <li>ii. an Aboriginal object,</li> <li>iii. a building, work, relic or tree within a heritage conservation area,</li> </ul>		
	<p>b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,</p>	<p>Development consent is also sought for works to the interior of the buildings as set out in the Heritage Impact Assessment.</p>	<p>Yes</p>
	<p>c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,</p>		<p>NA</p>
	<p>d) disturbing or excavating an Aboriginal place of heritage significance,</p>		<p>NA</p>
	<p>e) erecting a building on land—</p> <ul style="list-style-type: none"> <li>i. on which a heritage item is located or that is within a heritage conservation area, or</li> <li>ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,</li> </ul>	<p>The proposal involves erecting a building in a heritage conservation area (No 23).</p>	<p>Yes</p>
	<p>f) subdividing land—</p> <ul style="list-style-type: none"> <li>i. on which a heritage item is located or that is within a heritage conservation area, or</li> <li>ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.</li> </ul>	<p>Subdivision will form part of a subsequent application.</p>	<p>Yes</p>



	<p>4) Effect of proposed development on heritage significance</p> <p>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</p>	This is addressed in the Heritage Impact Assessment.	Yes
	<p>5) Heritage assessment</p> <p>The consent authority may, before granting consent to any development—</p> <ul style="list-style-type: none"> <li>a) on land on which a heritage item is located, or</li> <li>b) on land that is within a heritage conservation area, or</li> <li>c) on land that is within the vicinity of land referred to in paragraph (a) or (b),</li> </ul> <p>require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	This is addressed in the Heritage Impact Assessment.	Yes
5.21 Flood Planning	<p>2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development—</p>	The proposed works retain the existing floor levels of the building.	Yes
	<ul style="list-style-type: none"> <li>a) is compatible with the flood function and behaviour on the land, and</li> </ul>	The proposed works do not alter the existing floor level; therefore, the design is not anticipated to alter the flood function and/or behaviour on the land.	Yes



	b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and	As there is no change to the existing floor levels, it is not anticipated that the flood behaviour will be impacted.	Yes
	c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and	Refer above	Yes
	d) incorporates appropriate measures to manage risk to life in the event of a flood, and	Refer above	Yes
	e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.	No such impacts are anticipated.	Yes
	3) In deciding whether to grant development consent on land to which this clause applies, the consent authority must consider the following matters—		
	a) the impact of the development on projected changes to flood behaviour as a result of climate change,	Given that it is proposed to retain the existing floor levels, no significant adverse changes are anticipated that would otherwise affect flood behaviour.	Yes
	b) the intended design and scale of buildings resulting from the development,	The design and scale of buildings is appropriate having regard to flooding constraints.	Yes
	c) whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood,	As there are no changes to the existing ground level, nor any basement proposed to the building, no additional measures are proposed.	Yes



	d) the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.	Such impacts are not anticipated.	Yes				
<b>Part 6 Additional local provisions</b>							
6.1 Acid Sulfate Soils	2) Development consent is required for the carrying out of works described in the Table to this subclause on land shown on the Acid Sulfate Soils Map as being of the class specified for those works. <table border="1"> <thead> <tr> <th>Class</th> <th>Works</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>Works more than 2m below the natural ground surface. Works by which the watertable is likely to be lowered more than 2m below the natural ground surface.</td> </tr> </tbody> </table>	Class	Works	4	Works more than 2m below the natural ground surface. Works by which the watertable is likely to be lowered more than 2m below the natural ground surface.	No excavation works are proposed that may otherwise impact upon potential acid sulfate soils.	Yes
Class	Works						
4	Works more than 2m below the natural ground surface. Works by which the watertable is likely to be lowered more than 2m below the natural ground surface.						
6.2 Earthworks	Development consent is required for earthworks unless - a) the earthworks are exempt development under this Plan or another applicable environmental planning instrument, or b) the earthworks are ancillary to other development for which development consent has been given.	The proposed earthworks are ancillary to the proposed development and minor in nature in accordance with the Geotechnical and Structural Reports accompanying the DA, which generally limit these due to the Sydney Water sewer trunk main running below the site.	Yes				
6.4 Stormwater management	2) This clause applies to all land in residential, business, industrial and environmental protection zones.	There are no changes proposed to the existing stormwater arrangements.	NA				
	1) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development— a) is designed to maximise the use of water permeable surfaces on the land having	As above.	NA				



	<p>regard to the soil characteristics affecting on-site infiltration of water, and</p> <p>b) includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and</p> <p>c) avoids any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if that impact cannot be reasonably avoided, minimises and mitigates the impact</p>		
6.8 Salinity	<p>Before determining a development application for development on land to which this clause applies, the consent authority must consider the following –</p> <p>a) whether the development is likely to have any adverse impact on salinity processes on the land,</p> <p>b) whether salinity is likely to have an impact on the development,</p> <p>c) and appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.</p>	This is addressed in the Geotechnical Desktop Study.	Yes
6.9 Foreshore Scenic Protection Area	<p>1) The objective of this clause is to protect visual aesthetic amenity and views to and from Sydney Harbour, the Pacific Ocean and the foreshore in Manly.</p> <p>2) This clause applies to land that is shown as “Foreshore Scenic Protection Area” on the Foreshore Scenic Protection Area Map.</p> <p>3) Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the following matters—</p>	The site is located in the Foreshore Scenic Protection Area	Yes



	a) impacts that are of detriment to the visual amenity of harbour or coastal foreshore, including overshadowing of the foreshore and any loss of views from a public place to the foreshore,	The proposed development will not result in any loss of views from a public place to the foreshore.	Yes
	b) measures to protect and improve scenic qualities of the coastline,	The proposed development will not adversely impact the scenic qualities of the coastline.	Yes
	c) suitability of development given its type, location and design and its relationship with and impact on the foreshore,	The proposed development, for mixed use purposes is consistent with similar land uses in the vicinity of the site and will have no impact on the foreshore.	Yes
	d) measures to reduce the potential for conflict between land-based and water-based coastal activities.		NA
6.11 Active Street Frontage	3) Development consent must not be granted to the erection of a building, or a change of use of a building, on land to which this clause applies unless the consent authority is satisfied that the building will have an active street frontage after its erection or change of use.	The proposed development will retain and enhance the existing openings to the street frontages, including an increased retail offering to Market Lane which will improve the opportunities for passive surveillance and direct activation to the street frontages.	Yes
	4) Despite subclause (3), an active street frontage is not required for any part of a building that is used for any of the following— a) entrances and lobbies (including as part of mixed use development), b) access for fire services, c) vehicular access.	Refer above.	Yes



		5) In this clause, a building has an active street frontage if all premises on the ground floor of the building facing the street are used for the purposes of business premises or retail premises.	Refer to Architectural Plans	Yes
6.13 Excellence	Design	2) This clause applies to development involving the erection of a new building or external alterations to an existing building— a) on land in Zone B2 Local Centre, and b) on land to which clause 6.19 applies.		
		2) Development consent must not be granted for development to which this clause applies unless the consent authority considers that the development exhibits design excellence.		
		a) contains buildings that consist of a form, bulk, massing and modulation that are likely to overshadow public open spaces, and	Matters of overshadowing are addressed in the SEE.	Yes
		b) is likely to protect and enhance the streetscape and quality of the public realm, and	The public realm benefits are addressed in the SEE.	Yes
		c) clearly defines the edge of public places, streets, lanes and plazas through separation, setbacks, amenity, and boundary treatments, and	As demonstrated by the photomontages, the proposal provides very clear definition between public and private spaces. Those that are public are inviting and well lit, with glass frontages that encourage people into these spaces, while providing continuity in setbacks to ensure that the building line to each frontage is not compromised.	Yes
		d) minimises street clutter and provides ease of movement and circulation of pedestrian, cycle, vehicular and service access, and	Movement and circulation spaces are clear for pedestrian purposes; there are no existing vehicular arrangements on the site and are not proposed as part of this application.	Yes



	<p>e) encourages casual surveillance and social activity in public places, streets, laneways and plazas, and</p>	<p>The degree of openings to both street frontages are increased and maximised to each of the building elevations, particularly to Market Lane at both the ground floor and upper building levels. These openings will provide a significant and material improvement for casual surveillance over the surrounding street frontages, as well as enhance social activity with the adjoining frontages.</p>	<p>Yes</p>
	<p>f) is sympathetic to its setting, including neighbouring sites and existing or proposed buildings, and</p>	<p>The Heritage Impact Statement provides the following in terms of the form and scale of the building, noting how this responds to its setting:</p> <p><i>The proposed works to the subject site will not seek to replicate heritage detail, character, built form, scale, or proportions. The proposed works primarily involve internal alterations and additions to the building and the proposed two storeys above 23 The Corso is recessed from the existing building line to maintain the current street alignments. The addition of two storeys complements the scale of the building as the subject site is lower than the adjoining medium density development and the third floor is well setback presenting essentially a three-storey bulk to The Corso partially obscured behind the approved new façade and parapet of 23 The Corso. The proposed storeys will not replicate the existing heritage details and character of the significant buildings and the design follows a contemporary approach in terms of form, scale, detailing and materials.<sup>1</sup></i></p>	

<sup>1</sup> Heritage Impact Statement, City Plan Heritage, April 2022, Page 25





		<p>It goes on to state that:</p> <p><i>The proposed two additional storeys over the previously approved front façade of 23 The Corso will also not dominate the heritage item as it will bring the scale of the subject building closer to the adjoining three to four storey buildings hence improving its streetscape contribution. As the proposed top floor is recessed from the building line and the second floor is partially obscured behind the approved new parapet, the new scale of the building will essentially be three-storeys, hence will not visually dominate the heritage item. The multi storey apartment building at 19-21 The Corso will continue to remain as the prominent building in the streetscape.</i><sup>2</sup></p>	
	g) protects and enhances the natural topography and vegetation including trees, escarpments or other significant natural features, and	No natural features are compromised by the proposed development and the existing topography of the land is relied upon.	Yes
	h) promotes vistas from public places to prominent natural and built landmarks, and	The proposal has no impact on vistas from public places that are inconsistent with the existing situation.	Yes
	i) uses high standards of architectural design, materials and detailing appropriate to the building type and location, and	As detailed previously, the proposal provides a high standard of architectural design, materials and detailing that is responsive to the streetscape contexts and immediate locality, which is interspersed with both heritage fabric and more contemporary composition of built form.	Yes

<sup>2</sup> Heritage Impact Statement, City Plan Heritage, April 2022, Page 26



	j) responds to environmental factors such as wind, reflectivity and permeability of surfaces, and	These aspects have been carefully considered in the design.	Yes
	k) coordinates shared utility infrastructure to minimise disruption at street level in public spaces.	Shared utility infrastructure has been maximised through the whole development.	Yes
6.16 Gross Floor Area in B2	1) The objective of this clause is to provide for the viability of Zone B2 Local Centre and encourage the development, expansion and diversity of business activities, that will contribute to economic growth, retention of local services and employment opportunities in local centres.	The proposed development retains and enhances the viability of the B2 Local Centre zone by enhancing diverse business opportunities that will provide a modest increase to economic growth and employment opportunity, while also enhancing the use of local services within the vicinity of the site.	Yes
	2) This clause applies to land in Zone B2 Local Centre.		Noted
	3) Development consent must not be granted to the erection of a building on land in Zone B2 Local Centre unless the consent authority is satisfied that at least 25% of the gross floor area of the building will be used as commercial premises	The proposed development provides 60% of the building for non-residential use.	Yes
	4) Development consent must not be granted for development on land to which this clause applies if the gross floor area of any retail premises on the land would exceed 1,000m <sup>2</sup> .	The gross floor area of retail premises already exceeds this provision on the site. Refer to the GFA Plans DA-24.	Yes

