

# WILLOWTREE PLANNING



11 May 2026

REF: WTJ26-091

Max Tran  
Planning Officer  
Affordable Housing Assessments  
NSW Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

*Via: NSW Planning Portal*

**RE: REQUEST FOR INDUSTRY-SPECIFIC SEARS - PROPOSED INFILL AFFORDABLE RESIDENTIAL DEVELOPMENT AT 10-12 VICTORIA PARADE, MANLY (LOT B AND LOT C OF DP337685)**

Dear Max,

We write on behalf of Luxcon Group (the Proponent) to the NSW Department of Planning, Housing and Infrastructure (DPHI) in support of a request for Industry-Specific Secretary's Environmental Assessment Requirements (SEARs), under the Rapid Assessment Framework (RAF) for a residential development. The intent of the letter is to demonstrate that the proposal is eligible for Industry-Specific SEARs.

The proposal involves the construction of a residential flat building development at 10-12 Victoria Parade, Manly, legally described as Lot B and C in DP 337685 (the Site).

The Site is located within the Northern Beaches Local Government Area (LGA) and is zoned R3 – Medium Density Residential, pursuant to the Manly *Local Environmental Plan 2013* (MLEP2013). The proposed development falls within the definition of 'Residential flat building', which is permissible with consent in the zone and under the environmental planning instrument (EPI).

The proposed development seeks consent for the demolition of existing structures and construction of a residential flat building development with 23 dwellings, communal open space, associated landscaping and car parking in basement levels, with a preliminary Estimated Development Cost (EDC) of \$79,390,753 (ex GST).

The proposed development satisfies the definition of State Significant Development (SSD) pursuant to Schedule 1, Clause 26A of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development for the purpose of in-fill affordable housing with an Estimated Development Cost (EDC) of more than \$75 million within the Eastern Harbour City.

The proposal benefits from being located on a site adjoining Manly Town Centre in a highly accessible area within walking distance of Manly Ferry. It is strategically placed to support government's priorities to support low-mid rise housing in accessible locations under Chapter 6 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP). In addition, the proposal benefits from the provisions of the infill affordable housing bonus under Chapter 2 of the Housing SEPP.

This letter provides an overview of the proposed development and the relevant planning framework that applies to enable the issuance of industry-specific SEARs, which will then guide the preparation of a formal Environmental Impact Statement (EIS) for development of the subject site.



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## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Infill Affordable Residential SSD  
10-12 Victoria Parade, Manly

The proposal is considered to meet the criteria for industry-specific SEARs, based on the following:

- It does not constitute Designated Development
- It is wholly permissible under the applicable Environmental Planning Instruments
- It does not involve a concept development application (DA)
- it does not involve complex environmental impacts requiring Project-Specific SEARs.

The following sections provide an overview of proposal to inform the NSW DPHI's decision making for the issuance of industry-specific SEARs.

### 1.0 SITE DESCRIPTION

The site is identified as 10-12 Victoria Parade, Manly, legally described as follows:

| TABLE 1: SITE IDENTIFICATION |                    |
|------------------------------|--------------------|
| Site Address                 | Legal Descriptions |
| 10 Victoria Parade           | Lot B DP 337685    |
| 12 Victoria Parade           | Lot C DP 337685    |

The Site is zoned R3 Medium Density Residential zone pursuant to MLEP2013.

Existing attributes of the Site are noted as follows:

- The Site is located in Manly and comprises a rectangular allotment with an area of 1,272m<sup>2</sup>.
- The Site has a frontage of 27 metres to Victoria Parade to the northwest.
- The Site is currently occupied by two parallel, three-storey residential flat buildings of 1960s brick construction.
- The northern boundary adjoins the E1 Local Centre zone, the core of Manly's town centre.
- To the south, the surrounding area is characterised by Medium Density Residential (R3) zoning, transitioning to General Residential (R1) further south.
- Manly Beach is located approximately 270 metres to the east.
- Manly Wharf is located approximately 300 metres to the northwest, providing regular ferry services to Circular Quay, Watsons Bay, Rose Bay and Darling Harbour (Northern Beaches TOD equivalent).
- Manly Village Public School is located approximately 250 metres to the north of the Site.
- Medical practices are located within approximately 100 metres to the north of the Site.

The existing site context is shown in **Figure 1** and **Figure 2** below.



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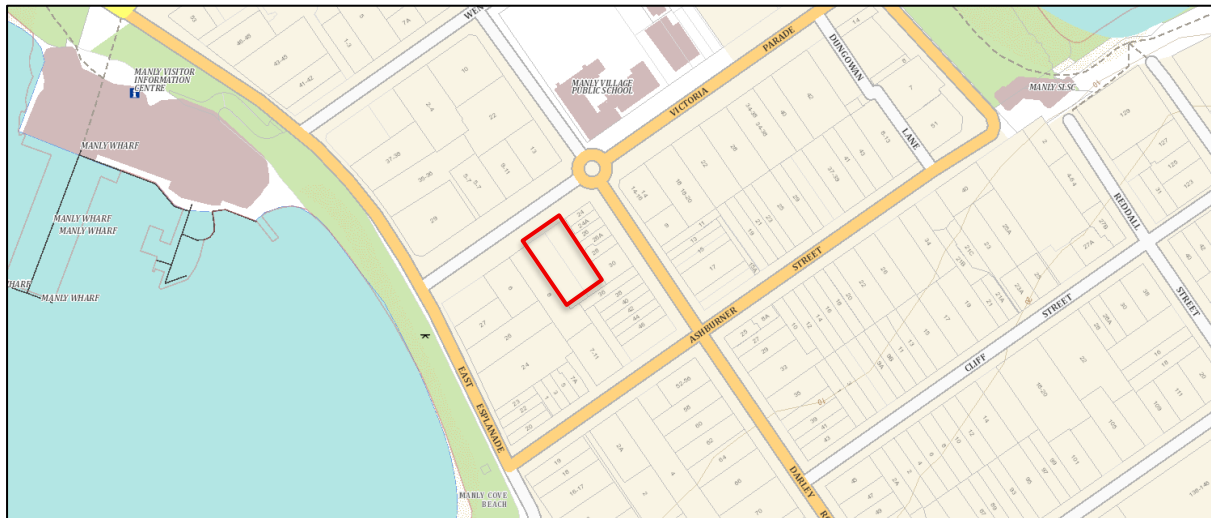


Figure 1. Cadastral Map (Source: SIX Maps, 2026)



Figure 2. Aerial Map (Source: Nearmap, 2026)

## 2.0 PROPONENT DETAILS

The Proponent for this proposal is Luxcon Group, refer to **TABLE 2**.

| TABLE 2: PROPONENT CONTACT DETAILS |                       |
|------------------------------------|-----------------------|
| Company Details                    | Luxcon Group          |
| Contact Name                       | Matthew Nesbitt       |
| Position                           | General Manager       |
| Contact Number                     | 02 9233 3319          |
| Email Address                      | matthew@luxcon.com.au |

## 3.0 ESTIMATED DEVELOPMENT COST (EDC)

A preliminary EDC has been prepared by Napier & Blakeley, which estimates a total of \$79,390,753 (ex GST). The EDC of the proposed development in accordance with the EDC definition under the



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*Environmental Planning & Assessment Regulation 2021* (EP&A Regulation), is estimated based on the scope of works outlined in **Section 4.0** below.

### 4.0 PROJECT DETAILS

The proposal seeks development consent for the demolition of existing structures and construction of a new residential flat building at 10-12 Victoria Parade, Manly. The preliminary concept plans prepared by PBD Architects are included within **Appendix 1**.

#### Project Description

The proposal comprises the following:

- Demolition of the two existing three-storey residential flat buildings;
- Site preparation works, including excavation;
- Construction of a new nine (9) storey residential flat building comprising 23 dwellings with two levels of basement parking;
- Communal open space including swimming pool and deep soil planting in compliance with NSW ADG requirements; and
- Stormwater, drainage and utility works ancillary to the development.

The following table summarises the development particulars:

| TABLE 3: DEVELOPMENT PARTICULARS |                                                                                                                                                                                                                                                 |                           |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| Component                        | Proposed                                                                                                                                                                                                                                        |                           |
| Site Area                        | 1,272m <sup>2</sup>                                                                                                                                                                                                                             |                           |
| Primary Land Use                 | Residential Flat Building                                                                                                                                                                                                                       |                           |
| Zoning                           | R3 Medium Density Residential                                                                                                                                                                                                                   |                           |
| Gross Floor Area                 | Level                                                                                                                                                                                                                                           | GFA                       |
|                                  | Ground                                                                                                                                                                                                                                          | 292.4m <sup>2</sup>       |
|                                  | Level 1                                                                                                                                                                                                                                         | 496.3m <sup>2</sup>       |
|                                  | Level 2                                                                                                                                                                                                                                         | 496.3m <sup>2</sup>       |
|                                  | Level 3                                                                                                                                                                                                                                         | 486.2m <sup>2</sup>       |
|                                  | Level 4                                                                                                                                                                                                                                         | 486.2m <sup>2</sup>       |
|                                  | Level 5                                                                                                                                                                                                                                         | 486.2m <sup>2</sup>       |
|                                  | Level 6                                                                                                                                                                                                                                         | 400.6m <sup>2</sup>       |
|                                  | Level 7                                                                                                                                                                                                                                         | 401.5m <sup>2</sup>       |
|                                  | Level 8                                                                                                                                                                                                                                         | 105.5m <sup>2</sup>       |
|                                  | <b>TOTAL</b>                                                                                                                                                                                                                                    | <b>3,637m<sup>2</sup></b> |
| Floor Space Ratio                | <ul style="list-style-type: none"><li>▪ MLEP2013 maximum FSR - 0.75:1</li><li>▪ Low Mid-Rise housing permissible FSR – 2.2:1</li><li>▪ Infill Affordable Housing bonus – 0.66:1 (30%)</li><li>▪ Total permissible FSR - <b>2.86:1</b></li></ul> |                           |
| Building Height                  | <ul style="list-style-type: none"><li>▪ MLEP2013 maximum permissible height - 11m</li></ul>                                                                                                                                                     |                           |



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**TABLE 3: DEVELOPMENT PARTICULARS**

| Component                  | Proposed                                                                                                                                                                              |                                       |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
|                            | <ul style="list-style-type: none"><li>Low Mid-Rise housing permissible height – 22m</li><li>Affordable bonus – 6.6m (30%)</li><li>Maximum permissible height - <b>28.6m</b></li></ul> |                                       |
| Number of Storeys          | <ul style="list-style-type: none"><li>Nine storeys</li><li>Plus 2 basement levels below ground</li></ul>                                                                              |                                       |
| Number of Units            | Type                                                                                                                                                                                  | Number                                |
|                            | 2 Bedroom                                                                                                                                                                             | 4 (17%)                               |
|                            | 3 Bedroom                                                                                                                                                                             | 19 (83%)                              |
|                            | <b>Total</b>                                                                                                                                                                          | <b>23</b>                             |
| Affordable Housing         | Minimum 15% for at least 15 years (5 units)                                                                                                                                           |                                       |
| Car Parking                | 2 basement levels (approximately 46 spaces)                                                                                                                                           |                                       |
| Landscaped Area            | 567m <sup>2</sup> (45% of site area), including swimming pool and landscaped areas at ground level.<br>Exceeding the minimum requirement of 318m <sup>2</sup> (25%).                  |                                       |
| Deep Soil                  | 163m <sup>2</sup> (13% of site area).<br>Exceeding the ADG minimum requirement: 89m <sup>2</sup> (7%).                                                                                |                                       |
| Earthworks                 | Excavation works proposed to facilitate construction of two levels of basement car parking.                                                                                           |                                       |
| Setbacks                   | Location                                                                                                                                                                              | Setback                               |
|                            | Victoria Parade (Northwest)                                                                                                                                                           | 3m (habitable) / 4.5m (non-habitable) |
|                            | Rear (Southeast)                                                                                                                                                                      | 6m (Levels 1-2) / 9m (Levels 3+)      |
|                            | Side (Northeast)                                                                                                                                                                      | 2m                                    |
|                            | Side (Southwest)                                                                                                                                                                      | 3m                                    |
| Estimated Development Cost | \$79,390,753 (ex GST)                                                                                                                                                                 |                                       |



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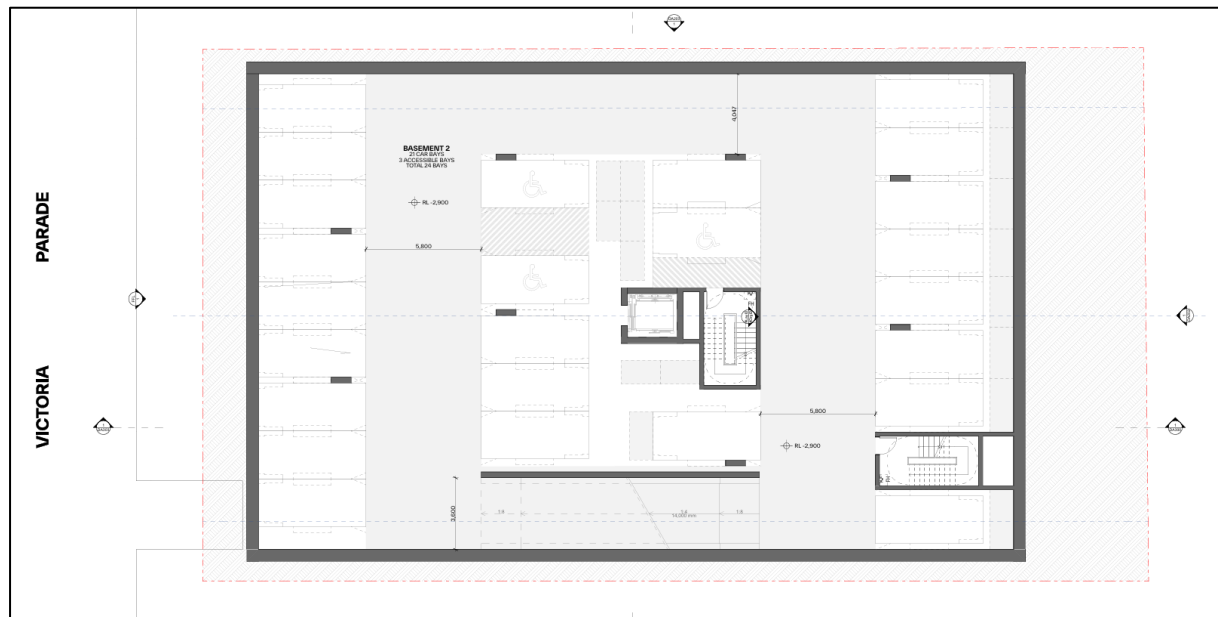


Figure 3. Floor Plan for Basement 2 (Source: PBD Architects, 2026)

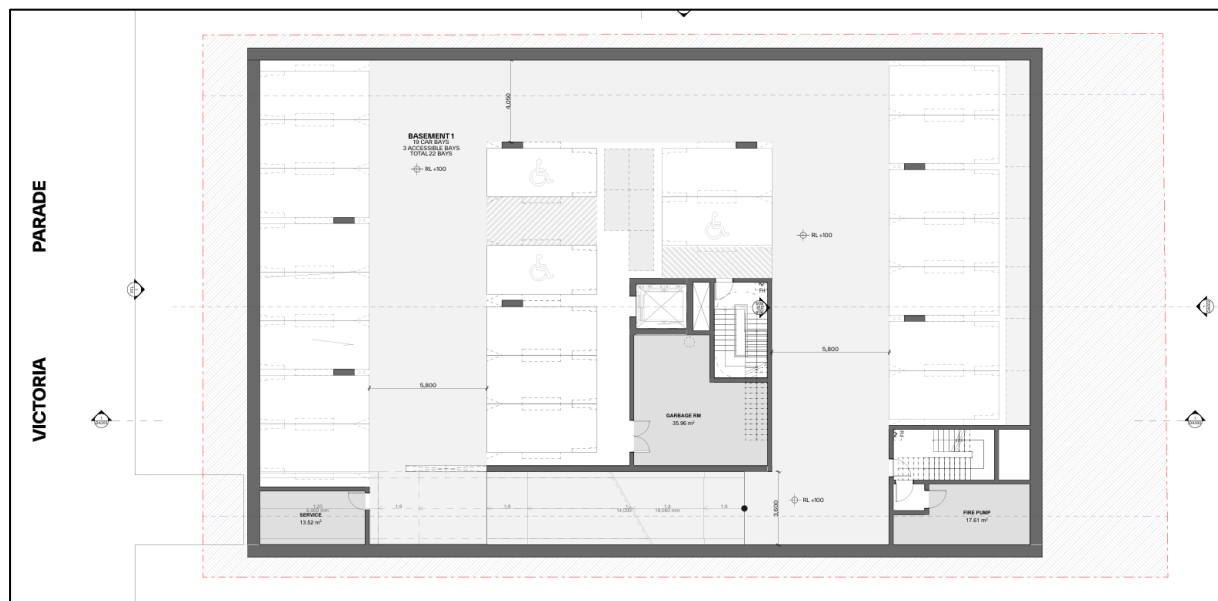


Figure 4. Floor Plan for Basement 1 (Source: PBD Architects, 2026)



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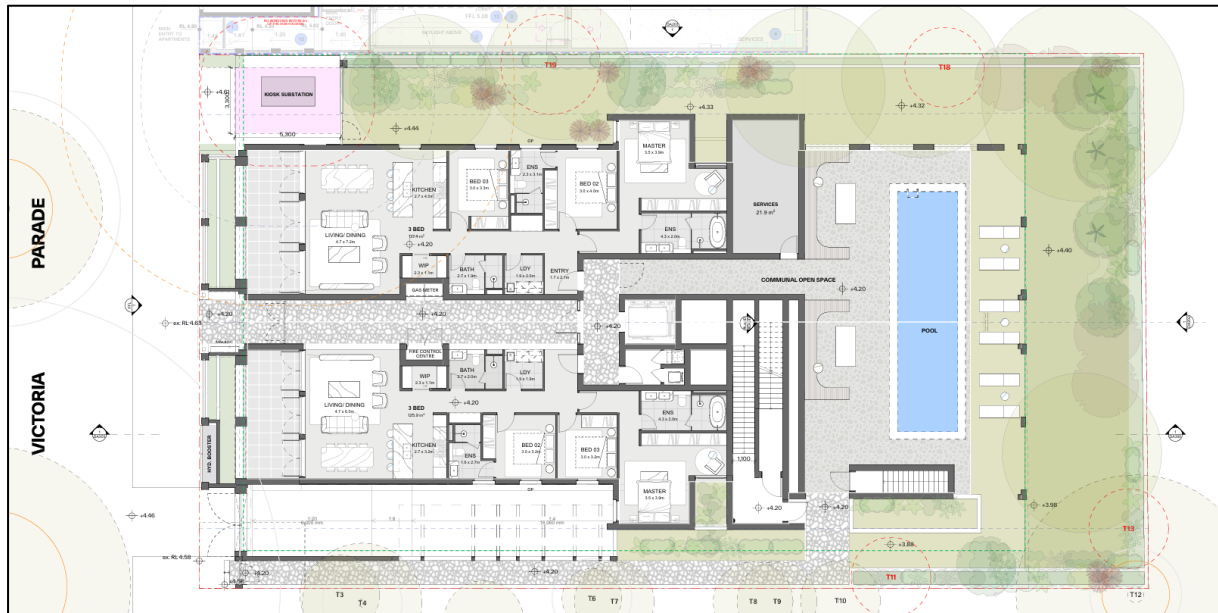


Figure 5. Floor Plan for Ground Floor (Source: PBD Architects, 2026)



Figure 6. Floor Plan for Level 1 (Source: PBD Architects, 2026)

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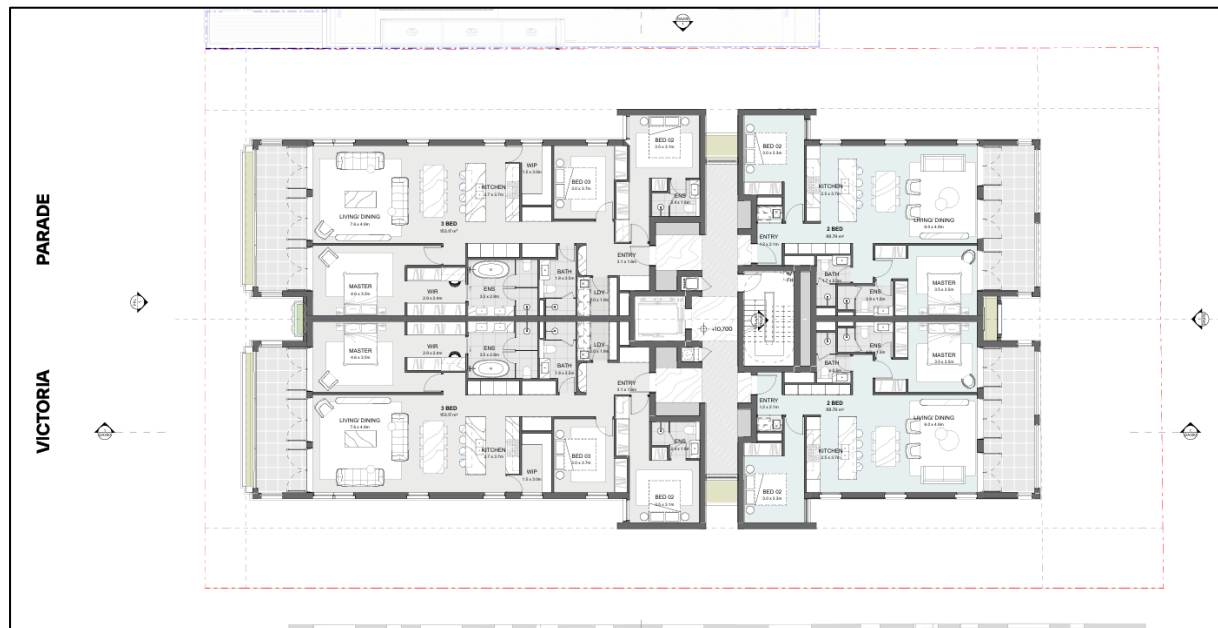


Figure 7. Floor Plan for Level 2 (Source: PBD Architects, 2026)

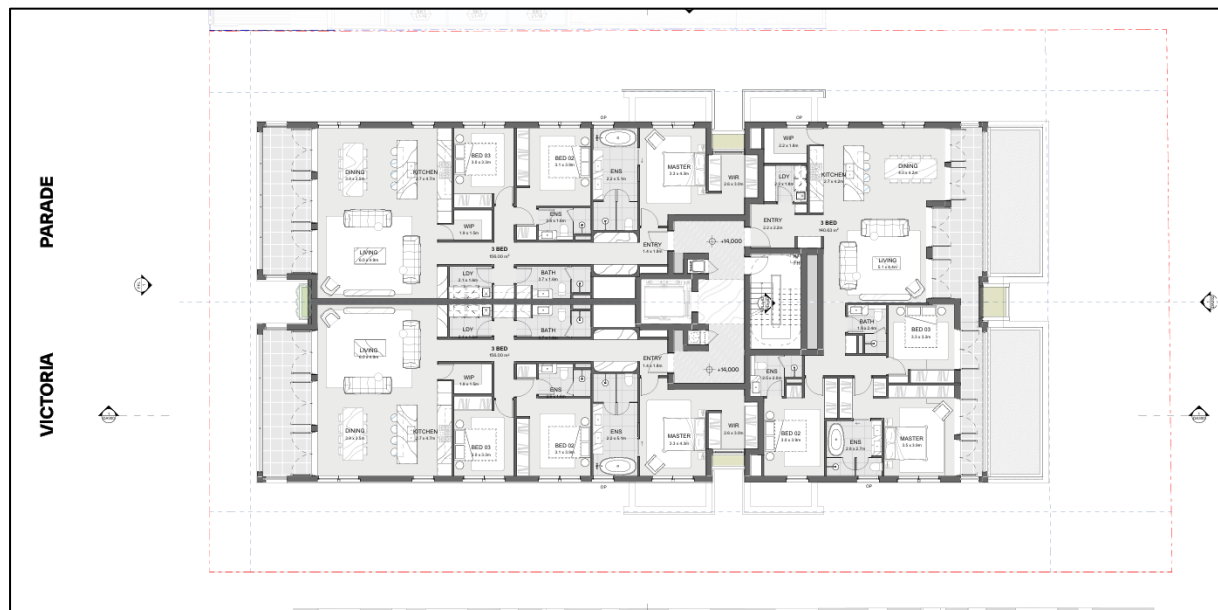


Figure 8. Floor Plan for Level 3 (Source: PBD Architects, 2026)



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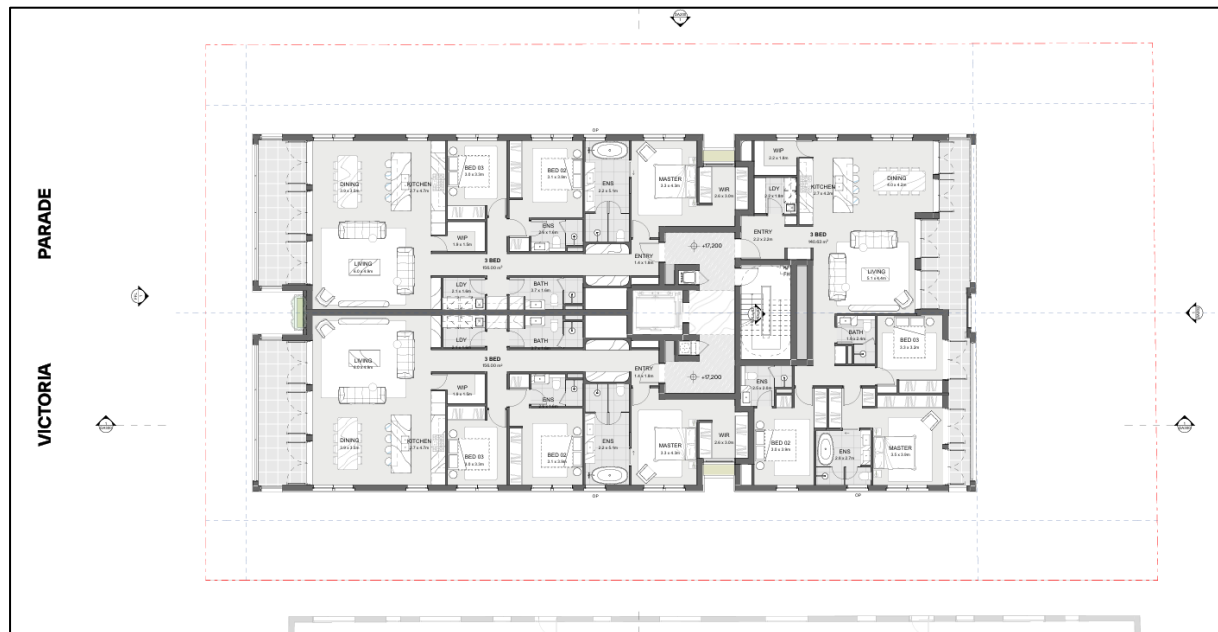


Figure 9. Floor Plan for Level 4 (Source: PBD Architects, 2026)

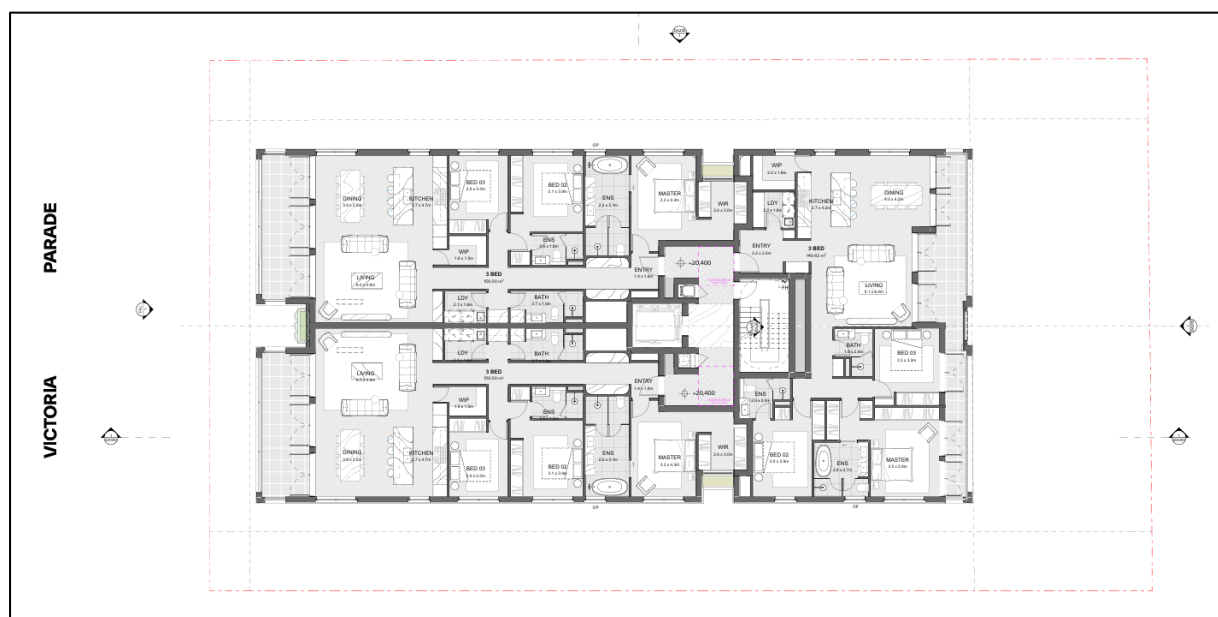


Figure 10. Floor Plan for Level 5 (Source: PBD Architects, 2026)

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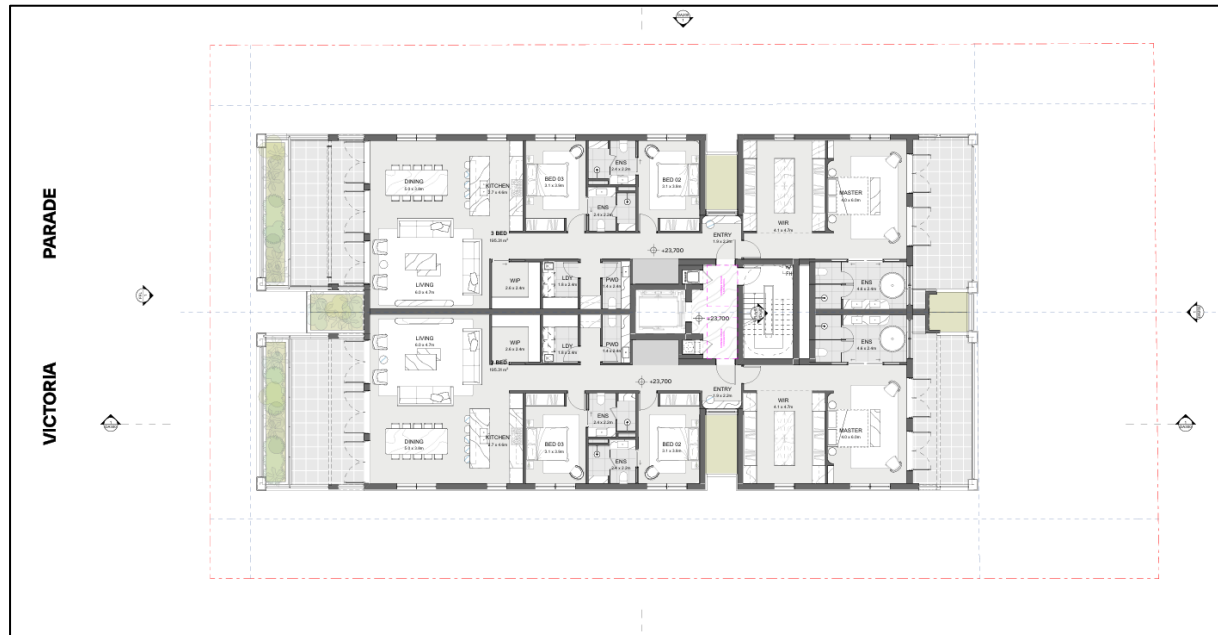


Figure 11. Floor Plan for Level 6 (Source: PBD Architects, 2026)

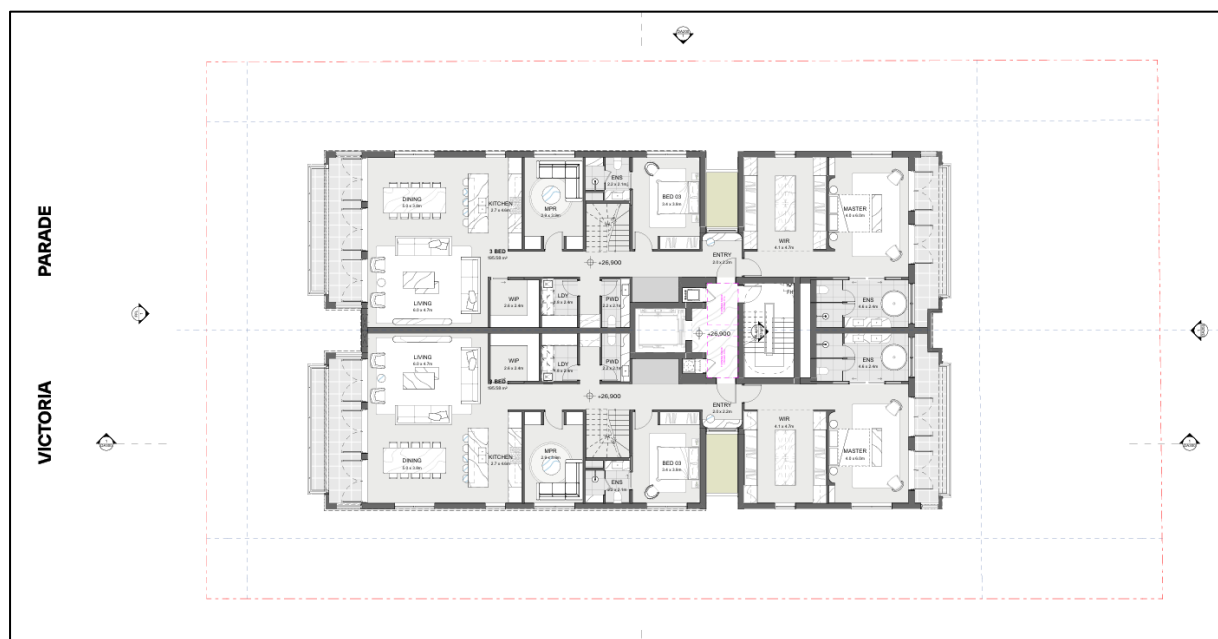


Figure 12. Floor Plan for Level 7 (Source: PBD Architects, 2026)



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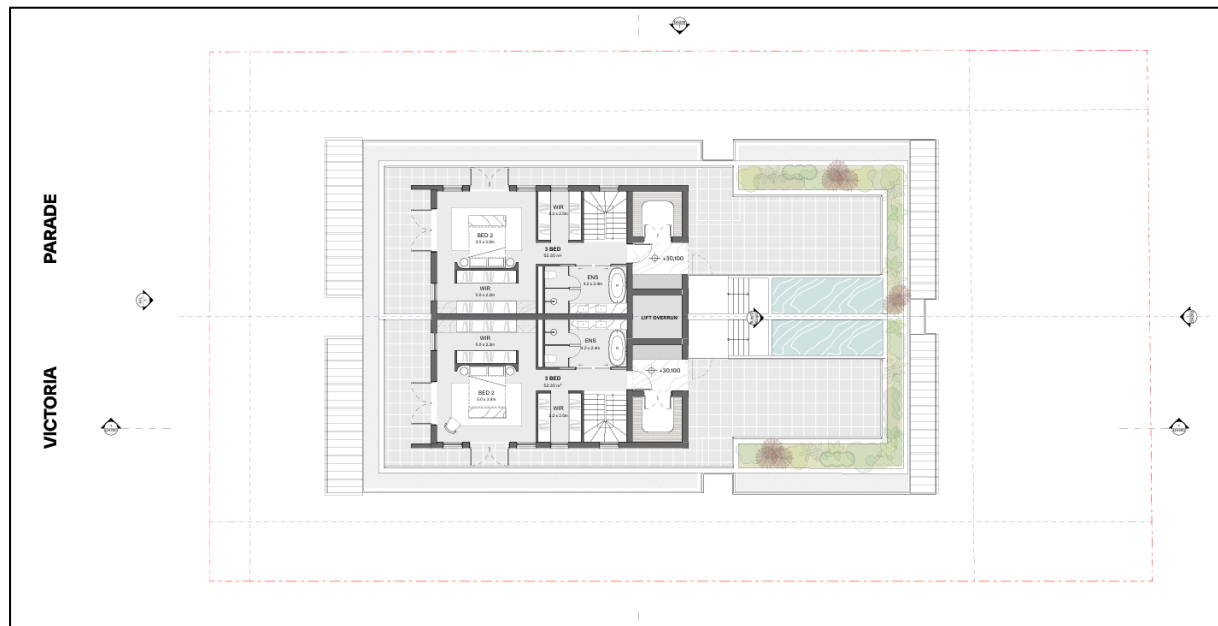


Figure 13. Floor Plan for Level 8 (Source: PBD Architects, 2026)

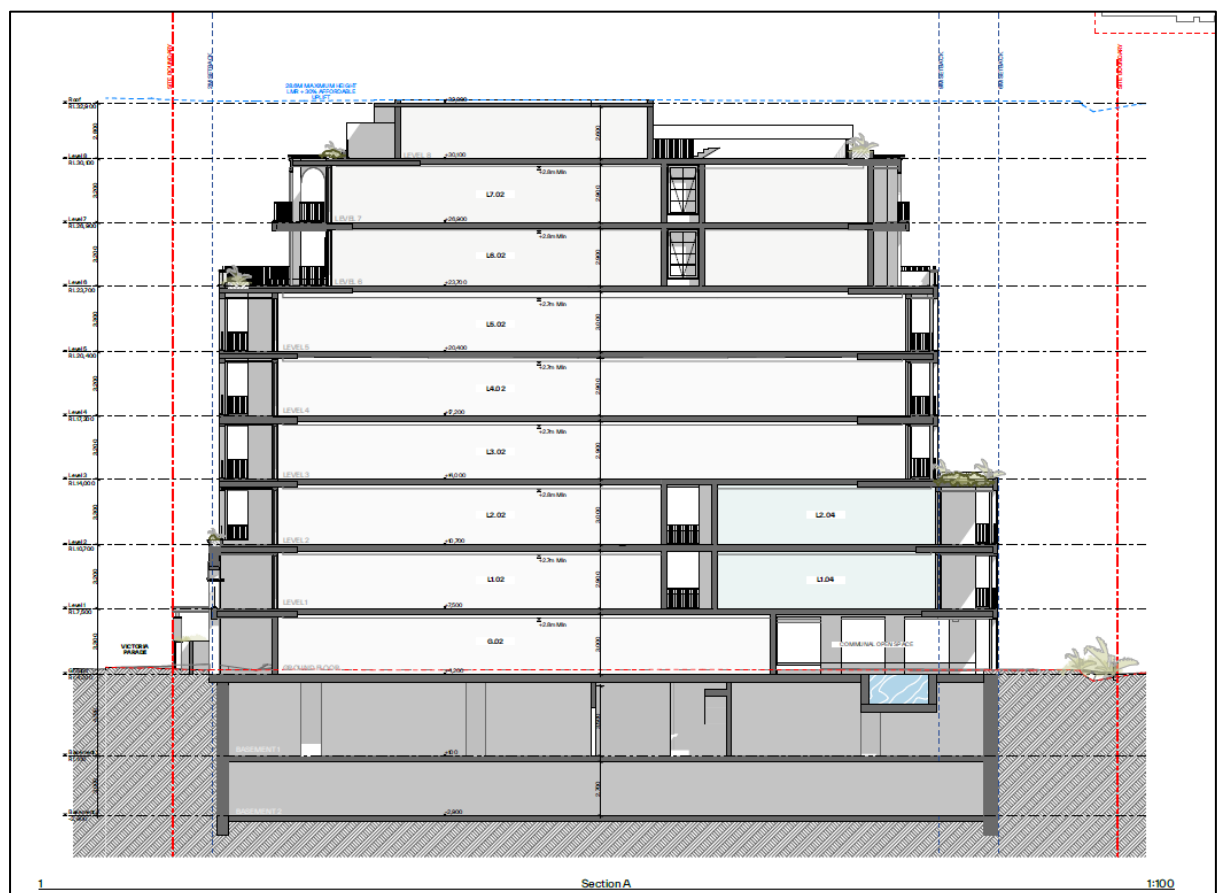


Figure 14. Proposed Long Section (Source: PBD Architects, 2026)



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**Figure 15. Preliminary Perspective View** (Source: PBD Architects, 2026)

## 5.0 STATUTORY CONTEXT

This section sets out the statutory planning framework and controls relevant to the proposal.

The following statutes, strategic plans and policies have been considered as part of the development planning phase:

### Commonwealth Planning:

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

### State Planning:

The following statutory matters relevant to the SSDA will be addressed in the EIS:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Water Management Act 2000*
- *Biodiversity Conservation Act 2016*
- *Heritage Act 1977*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Housing) 2021*

### Local Planning:

- *Manly Local Environmental Plan 2013*
- *Manly Development Control Plan 2013*



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### 5.1 Environment Protection and Biodiversity Conservation Act 1999

Under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species) must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval at a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a “controlled action”, and formal Commonwealth approval is required.

The requirements of the EPBC Act will be considered as part of the forthcoming EIS.

### 5.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing statute for all development in NSW and pursuant to Part 4, the proposal is considered SSD under the Planning Systems SEPP.

#### 5.2.1 Section 4.15(1) of the EP&A Act 1979

Section 4.15(1) of the EP&A Act specifies the matters, that a consent authority must consider when determining a DA. The forthcoming EIS will consider and address all matters outlined in Section 4.15 of the EP&A Act.

#### 5.2.2 Section 4.46 of the EP&A Act 1979 – Integrated Development

Section 4.46 of the EP&A Act defines ‘Integrated Development’ as matters which require consent from the consent authority and one or more authorities under related legislation. Integrated development does not apply to SSD.

### 5.3 Environmental Planning and Assessment Regulation 2021

Section 7(1) of the EP&A Regulation states that: *“Development described in Schedule 3, Part 2 is declared to be designated development unless it is not designated development under Schedule 3, Part 3.”* The proposal, being a residential flat building, does not trigger Designated Development pursuant to Schedule 3 of the EP&A Regulation.

### 5.4 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seek to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the EP&A Act. Pursuant to Section 7.2(1) of the BC Act, development or an activity is likely to significantly affect threatened species if:

- (a) *it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) *the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) *it is carried out in a declared area of outstanding biodiversity value.*



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Pursuant to Section 7.9 of the BC Act, an SSD “is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values”.

It is anticipated that the proposed development will not have any significant impact on the environment, and as a result the proponent will seek a waiver to the preparation of a BDAR.

### 5.5 Water Management Act 2000

The objective of the WM Act is the sustainable and integrated management of the state's water for the benefit of both present and future generations.

No mapped water bodies are located in proximity to the Site and therefore a Controlled Activity Approval will not be required.

Should the proposed development involve excavation that is below the existing ground water level, it may require an aquifer interference approval under the WM Act. Consultation with Water NSW and DPHI Water will be undertaken.

### 5.6 State Environmental Planning Policy (Planning Systems) 2021

Schedule 1 of the Planning Systems SEPP includes provisions for developments to be undertaken as SSD. Clause 26A, Schedule 1 is relevant to the proposed development:

*26A In-fill Affordable Housing*

- a) The part of the development that is residential development has an estimated development cost of:*
  - i) **for development on land in the Eastern Harbour City, Central River City or Western Parkland City in the Six Cities Region—more than \$75 million, or***
  - ii) **for development on other land—more than \$30 million, and***
- b) the development does not involve development prohibited under an environmental planning instrument applying to the land.*

The EDC of the proposed development is in excess of \$75 million, thus the SSD provisions apply.

### 5.7 State Environmental Planning Policy (Housing) 2021

The State Environmental Planning Policy (Housing) 2021 (Housing SEPP) is a key instrument applicable to the proposed development. Two provisions are particularly relevant.

#### 5.7.1 Low and Mid Rise Housing

Chapter 6 of the Housing SEPP applies to residential development in certain areas within the Greater Sydney region, including dual occupancies, multi dwelling housing, residential flat buildings and shop top housing. The aim of Chapter 6 is to encourage the delivery of low and mid rise (LMR) housing in areas well-located with regard to goods, services and public transport.

The Site is classified as a **LMR Housing Inner Area** under Chapter 6 of the Housing SEPP, given it satisfied the criteria of being located within 400 metres walking distance of Manly Town Centre. As seen from **Figure 16** below, the Site adjoins Manly Town Centre which is defined as a LMR Centre. Pursuant to the LMR provisions, the following non-discretionary development standards apply:

- Maximum Building Height: **22m**
- Maximum FSR: **2.2:1**

Residential flat buildings are a permissible land use within the LMR Housing Inner Area on R3 zoned land. The proposed development is consistent with this permissibility framework and the intent of Chapter 6 to facilitate housing density in well-serviced locations.





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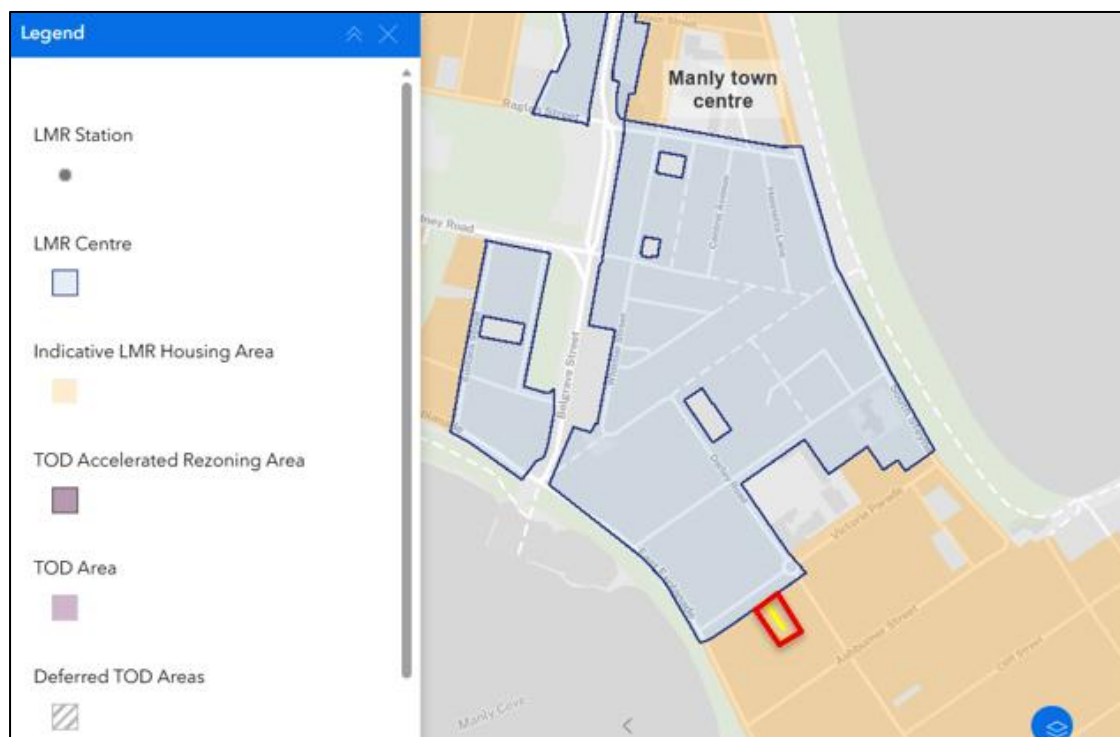


Figure 16. Low and Mid Rise Housing Policy Indicative Map (Spatial Portal, 2026)

### 5.7.2 In-fill Affordable Housing

Chapter 2, Part 2, Division 1 of the Housing SEPP relates to in-fill affordable housing and applies to residential development that is permitted with consent and includes an affordable housing component of at least 10%, where the development is carried out in an accessible area within the Six Cities Region.

**Accessible area** means land within—

(a) 800m walking distance of—

(i) a public entrance to a railway, metro or light rail station, or

(ii) for a light rail station with no entrance—a platform of the light rail station, or

**(iii) a public entrance to a wharf from which a Sydney Ferries ferry service operates, or**

(b) (Repealed)

(c) 400m walking distance of a bus stop used by a regular bus service, within the meaning of the [Passenger Transport Act 1990](#), that has at least 1 bus per hour servicing the bus stop between—

(i) 6am and 9pm each day from Monday to Friday, both days inclusive, and

(ii) 8am and 6pm on each Saturday and Sunday.

The Site is located in an **accessible area** being within 300 metres walking distance of multiple bus stops and Manly Wharf, which provides regular ferry services to Circular Quay, Watsons Bay, Rose Bay and Darling Harbour.

Accordingly, the proposed development, which is permitted with consent under the Housing SEPP and MLEP2013, and which incorporates an affordable housing component of 15%, is eligible to access the following bonuses:

- Additional FSR of up to **30%** above the applicable base controls; and
- Additional building height of up to **30%** above the applicable base controls



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As required by Chapter 2, Part 2, Division 1, Section 2 of the Housing SEPP, the development will include a minimum affordable housing component of 15% to be used for affordable housing for at least 15 years.

### 5.7.3 LMR and In-fill Affordable Housing Bonuses

The proposal seeks to apply the in-fill affordable housing bonuses on top of the LMR non-discretionary development standards under Chapter 6. This approach yields the following maximum development parameters applicable to the Site:

| TABLE 4: LMR & IN-FILL AFFORDABLE HOUSING BONUSES |                  |                                   |
|---------------------------------------------------|------------------|-----------------------------------|
| Development Standard                              | Base LMR Control | With 30% Affordable Housing Bonus |
| Building Height                                   | 22m              | <b>28.6m</b>                      |
| FSR                                               | 2.2:1            | <b>2.86:1</b>                     |

The proposed development achieves a building height of 28.6 metres and an FSR of 2.86:1, derived from the permissible FSR of 2.2:1 under the infill affordable housing controls (as applicable to the R3 zone) with a 30% affordable housing floor space bonus applied.

The non-discretionary nature of the affordable housing development standards under Division 1 means that the consent authority must not refuse consent or impose more onerous conditions on these grounds, where compliance is achieved, reinforcing the merits of this development pathway.

### 5.8 State Environmental Planning Policy (Sustainable Buildings) 2022

The Sustainable Building SEPP establishes standards for the design and construction of new buildings to improve sustainability outcomes, including energy efficiency, water efficiency, thermal performance and embodied emissions.

Chapter 2 of the Sustainable Buildings SEPP applies to residential development, including residential flat buildings, as BASIX development. Pursuant to Cl. 2.1, Schedule 1 sets out the standards that apply to the proposed development, including minimum reductions in greenhouse gas emissions from energy use, mains-supplied potable water use, and thermal performance standards for dwellings. The proposed development is a residential flat building of nine (9) storeys above ground level, and accordingly the energy standards in Column 5 of Table 1 (Schedule 1, section 2) apply, requiring greenhouse gas emissions to be less than the baseline by at least 57% (Climate Zone 17, being the applicable zone for the Sydney coastal area). The thermal performance standards in Table 4 (Schedule 1, section 7) also apply, given the building has 6 or more storeys above ground level.

Pursuant to Cl. 2.1(4), the BASIX standards do not apply to the extent that the Planning Secretary is satisfied the development is not capable of achieving a standard due to other development controls, noting the Site is located within a Heritage Conservation Area, this exemption may be relevant to certain building fabric measures and will be considered in the preparation of the BASIX Certificate.

Pursuant to Cl. 2.1(5), development consent must not be granted unless the consent authority is satisfied that embodied emissions attributable to the development have been quantified using an approved BASIX system. A BASIX Certificate will be prepared to accompany the EIS, demonstrating compliance with the applicable energy, water, thermal performance and embodied emissions standards under the Sustainable Buildings SEPP.



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### 5.9 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to:

- land use planning within the coastal zone, in a manner consistent with the objects of the *Coastal Management Act 2016*.
- management of hazardous and offensive development.
- remediation of contaminated land and to minimise the risk of harm.

Under Chapter 4 of the Resilience and Hazards SEPP, where a DA is made, the consent authority must not grant consent unless:

- (a) it has considered whether the land is contaminated, and
- (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
- (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.

A Preliminary Site Investigation will form part of the forthcoming EIS. It is noted that the Site already contains two residential flat buildings and therefore contamination is not expected to be significant.

### 5.10 Manly Local Environmental Plan 2013

The Site is zoned R3 under the provisions of MLEP2013. **Figure 17** below provides a representation of the Site and surrounding land zoning under the E1 and R1.



**Figure 17. LEP Land Use Zones** (Source: NSW Planning Portal, 2026)

#### 5.10.1 Land Use

Under the *Standard Instrument – Principal Local Environmental Plan* the proposal would be considered a 'Residential Flat Buildings', which means a building containing 3 or more dwellings, but does not include an attached dwelling, co-living housing or multi dwelling housing.



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### 5.10.2 Permissibility

The objectives of the zone are as follows:

- *To provide for the housing needs of the community within a medium density residential environment.*
- *To provide a variety of housing types within a medium density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To encourage the revitalisation of residential areas by rehabilitation and suitable redevelopment.*
- *To encourage the provision and retention of tourist accommodation that enhances the role of Manly as an international tourist destination.*

Within the R3 zone the following are permissible without consent:

- *Home-based child care; Home occupations*

Within the R3 zone the following are permissible with consent:

- *Attached dwellings; Boarding houses; Boat sheds; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Emergency services facilities; Environmental protection works; Flood mitigation works; Group homes; Home businesses; Home industries; Hostels; Information and education facilities; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Recreation areas; Recreation facilities (indoor); **Residential flat buildings**; Respite day care centres; Restaurants or cafes; Roads; Secondary dwellings; Semi-detached dwellings; Seniors housing; Service stations; Shop top housing; Signage; Take away food and drink premises; Tank-based aquaculture; Tourist and visitor accommodation; Water recycling facilities; Water supply systems*

Within the R3 zone the following are prohibited:

- *Advertising structures; Farm stay accommodation; Water treatment facilities; Any other development not specified in item 2 or 3*

The Site is zoned R3 Medium Density Residential under the MLEP 2013, which permits residential flat buildings. The proposed development is therefore permissible and consistent with the zone objectives.

### 5.10.3 Key LEP Planning Controls

An assessment against the key LEP development standards is provided below.

| TABLE 5: MLEP2013 DEVELOPMENT STANDARDS                   |                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provision                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Zoning — R3 Medium Density Residential (MLEP 2013)</b> | The Site is zoned R3 Medium Density Residential under the MLEP 2013. Residential flat buildings are permissible with development consent in the zone. The proposed development is consistent with the zone objectives, which include providing for the housing needs of the community within a medium density residential environment and encouraging revitalisation through suitable redevelopment. |



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**TABLE 5: MLEP2013 DEVELOPMENT STANDARDS**

| Provision                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Cl. 4.3 — Height of Buildings</b>                                 | <p>The maximum building height under the MLEP 2013 Height of Buildings Map is 11m. The proposed building height of 28.6m exceeds this control.</p> <p>However, pursuant to the non-discretionary development standards under Cl. 180(2)(b) of the Housing SEPP (LMR Inner Area), a maximum building height of 22m applies.</p> <p>A further 30% affordable housing bonus under Cl. 18 of the Housing SEPP yields a maximum permissible building height of 28.6m.</p>                                                                                                                                                                                                              |
| <b>Cl. 4.4 — Floor Space Ratio</b>                                   | <p>The maximum FSR under the MLEP 2013 FSR Map is 0.75:1. The proposed FSR of 2.86:1 exceeds this control.</p> <p>However, pursuant to the non-discretionary development standards under Cl. 180(2)(a) of the Housing SEPP (LMR Inner Area), a maximum FSR of 2.2:1 applies.</p> <p>A further 30% affordable housing bonus under Cl. 16 of the Housing SEPP yields a maximum permissible FSR of 2.86:1.</p>                                                                                                                                                                                                                                                                       |
| <b>Cl. 5.10 — Heritage Conservation (Heritage Conservation Area)</b> | <p>The Site is located within the Manly Town Centre Heritage Conservation Area. Pursuant to Cl. 5.10(2), development consent is required for demolition of existing structures and erection of a new building within a heritage conservation area. The consent authority must consider the effect of the proposed development on the heritage significance of the conservation area under Cl. 5.10(4). The proposed development has been designed with due regard to the heritage context. The buildings on the Site are not heritage listed. A Statement of Heritage Impact will be prepared by a suitably qualified heritage consultant to accompany the EIS.</p>               |
| <b>Cl. 5.10 — Heritage Conservation (Heritage Items)</b>             | <p>The site is not identified as a heritage item, however adjoins a number of heritage items.</p> <p>Heritage item 1238 'street trees' is located on Victoria Parade and is described as 'Norfolk Island Pines on both sides of road planted in carriageway' and is identified as an item of landscape heritage significance. Two Pines are located on Victoria Parade directly in front of the subject site. The design of the proposed driveway will ensure protection and the ongoing viability of adjacent trees.</p>  <p><b>Figure 18. Heritage Trees</b> (Source: Google Maps 2026)</p> |





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**TABLE 5: MLEP2013 DEVELOPMENT STANDARDS**

| Provision                                      | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                | Heritage items I124, I125, I126 and I127 (Commercial and Residential Building, local significance) are located immediately adjacent to the northeastern boundary of the Site. The proposed development will not directly impact these heritage items. A Statement of Heritage Impact will assess any indirect impacts on the significance of the adjoining heritage items, having regard to their setting, curtilage and relationship to the proposed built form.                                                                                                                      |
| <b>Cl. 5.21 — Flood Planning</b>               | <p>The Site is identified as being within the flood planning area as shown on the Northern Beaches Council Flood Hazard Map. A Flood Impact and Risk Assessment (FIRA) will be prepared to accompany the EIS.</p>  <p><b>Figure 19. Flood Hazard Map</b> (Source: Northern Beaches Mapping, 2026)</p>                                                                                                                                                                                               |
| <b>Cl. 5.22 — Special Flood Considerations</b> | The proposal is for a residential flat building, which does not constitute sensitive and hazardous development as defined in Cl. 5.22. The consent authority must nonetheless consider whether the development will affect the safe occupation and efficient evacuation of people in the event of a flood. This will be addressed in the FIRA accompanying the EIS.                                                                                                                                                                                                                    |
| <b>Cl. 6.1 — Acid Sulfate Soils</b>            | The Site is identified as Class 4 Acid Sulfate Soils on the MLEP 2013 Acid Sulfate Soils Map. Pursuant to Cl. 6.1(2), development consent is required for works more than 2 metres below the natural ground surface, or works by which the watertable is likely to be lowered more than 2 metres below the natural ground surface. The proposed two levels of basement excavation are likely to trigger this threshold. Pursuant to Cl. 6.1(3), an Acid Sulfate Soils Management Plan prepared in accordance with the Acid Sulfate Soils Manual will be prepared to accompany the EIS. |
| <b>Cl. 6.2 — Earthworks</b>                    | The proposal involves significant excavation works for two levels of basement car parking. Pursuant to Cl. 6.2(3), the consent authority must consider the likely disruption to drainage patterns and soil stability, the quality of excavated material, the effect on adjoining properties, and the destination of excavated material. These matters will be addressed in the Geotechnical Assessment accompanying the EIS.                                                                                                                                                           |





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**TABLE 5: MLEP2013 DEVELOPMENT STANDARDS**

| Provision                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Cl. 6.4 — Stormwater Management</b>            | The Site is located in a residential zone. Pursuant to Cl. 6.4(3), the development must maximise the use of water permeable surfaces, include on-site stormwater retention where practicable, and avoid significant adverse stormwater impacts on adjoining properties and receiving waters. These matters will be addressed in the Integrated Water Management Plan accompanying the EIS.                                                                                        |
| <b>Cl. 6.9 — Foreshore Scenic Protection Area</b> | The Site is within the Foreshore Scenic Protection Area (Sheet FSP_006). Pursuant to Cl. 6.9(3), the consent authority must consider impacts on visual amenity of the harbour or coastal foreshore, measures to protect scenic qualities of the coastline, and the suitability of the development given its type, location and design. A Visual Impact Assessment will be prepared to accompany the EIS addressing these matters.                                                 |
| <b>Cl. 6.12 — Essential Services</b>              | The Site is located within an established urban area with access to reticulated water, sewer, stormwater, electricity and telecommunications infrastructure. Pursuant to Cl. 6.12(1), the consent authority must be satisfied that essential services are available or that adequate arrangements have been made. Confirmation of service availability will be provided with the EIS. Again, it is noted that the Site already contains a residential flat building and services. |

## 6.0 OTHER APPROVALS/COMMENTS

No other approvals are sought for this proposal.

## 7.0 SITE SUITABILITY

The Site is highly suitable for the proposed development having regard to its locational attributes, existing land use, zoning context, and absence of significant environmental constraints.

### Accessibility and Transport

The Site is located approximately 300 metres from Manly Wharf, a key public transport hub providing ferry connections to Circular Quay and broader Sydney. Manly Wharf functions as a transit-oriented destination, anchoring a walkable, well-served urban precinct that supports reduced reliance on private vehicles and promotes sustainable travel behaviour. The Site falls within an 'accessible area' in accordance with section 15C of the Housing SEPP, reflecting its strong public transport credentials and suitability for the delivery of infill affordable housing in a well-connected location.

The F1 Manly ferry operates the following services to Circular Quay (as confirmed by the *Transport for NSW, F1 Manly Timetable, March 2026*) :

| Day       | Trips                                                |
|-----------|------------------------------------------------------|
| Mon–Thu:  | 60–65                                                |
| Friday:   | 70–75 (with additional late-night Friday-only trips) |
| Saturday: | 65 (including Saturday-only late-night trips)        |
| Sunday:   | 60–65                                                |

From July 2026, the Manly Fast Ferry will provide the following services to Circular Quay (*as confirmed by the Manly Fast Ferry, Timetable, July 2026*)

| Day        | Trips |
|------------|-------|
| Mon–Fr:    | 35–45 |
| Sat & Sun: | 36    |



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This results in approximately 200+ one-way ferry services per weekday along the Manly–Circular Quay corridor, and a weekly total ranging between 1,300–1,450. This frequency is comparable to many suburban rail corridors in metropolitan Sydney where TOD controls have been applied. While the current program identifies heavy rail and metro stations as the focus of the reform, the strategic rationale underpinning the program — proximity to high-frequency, high-capacity public transport should apply equally to major ferry interchanges such as Manly Wharf.

### **Proximity to Services and Amenities**

The Site adjoins Manly's local centre, providing residents with immediate walking access to a wide range of retail, commercial, dining, community, and recreational services. This proximity to everyday amenity further reinforces the Site's suitability for increased residential density, ensuring future residents can meet their daily needs without reliance on private transport.

### **Established Urban Context**

The surrounding area is characterised by an established pattern of medium to high density residential development, including existing residential flat buildings in the vicinity. This demonstrates that the precinct has an established capacity to accommodate a greater scale of residential development, and that the proposed built form is consistent with the existing and emerging character of the area.

### **Zoning and Land Use Compatibility**

The Site is zoned R3 Medium Density Residential under the applicable Local Environmental Plan, within which residential flat buildings are a permissible land use. The Site also contains an existing residential flat building, further confirming the established residential use and the appropriateness of the proposed development typology in this location.

### **Compliance with Housing SEPP**

The proposal has been designed to comply with the relevant provisions of the Housing SEPP, including the infill affordable housing provisions and LMR provisions, as applicable. The proposal directly responds to the NSW Government's objectives of boosting housing supply, improving affordability, and delivering new homes in accessible, well-serviced locations.

### **Environmental Constraints**

The Site is not affected by any significant environmental constraints that would preclude or unreasonably limit the delivery of an increased scale of residential flat building at this location. The absence of significant biodiversity values, threatened species habitat, or remnant vegetation means the Site can be developed without ecological offset obligations. The proposal will be accompanied by the requisite technical studies to address site-specific considerations, confirming the Site's capacity to accommodate the proposed development.

### **Infill Location / Urban Consolidation**

The Site represents an urban infill opportunity, making efficient use of existing serviced urban land rather than requiring greenfield expansion. This aligns with the NSW Government's urban consolidation objectives and the principle of directing growth to established areas with existing infrastructure capacity.



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Amalgamation of the two sites will facilitate a more efficient site layout, allowing for improved separation between buildings, greater solar access, and the delivery of meaningful communal open space that meets the needs of future residents.

### Northern Beaches Housing Demand

The Northern Beaches Local Housing Strategy (LHS, December 2021) identifies demand for an additional 14,803 dwellings across the LGA by 2036, with remaining demand from 2020 of approximately 12,018 dwellings. Apartments and semi-detached dwellings are projected to increase as a proportion of total dwellings, with most future demand expected to be for residential flat buildings. There is also an identified shortfall of approximately 8,100 social and affordable housing dwellings, projected to increase by a further 1,880 by 2036.

The LSPS identifies Manly as a higher density, least car-dependent centre suited to more compact housing, with higher density dwellings concentrated around coastal locations such as Manly. The LHS identifies Manly as a low-rise housing diversity area, where residential flat buildings, dual occupancies, seniors housing and boarding houses are supported within 400 metres of the local centre. Priority 15 of the LSPS identifies housing supply, choice and affordability as a key planning priority, with Action 15.2 specifically proposing the removal of FSR controls for dwellings in Manly as a mechanism to unlock housing supply. Priority 16 identifies access to quality social housing as a further planning priority. The proposal directly responds to these priorities by delivering additional dwellings in an established, accessible location within Manly's identified growth area.

### Existing Infrastructure Capacity

The Site is located within an established urban area with access to reticulated water, sewer, stormwater, electricity, and telecommunications infrastructure, reducing the cost and complexity of servicing the proposed development.

### Employment and Education Proximity

Proximity to employment centres (e.g. Manly CBD, Northern Beaches Hospital precinct) and nearby educational facilities strengthens the case for housing in this location, particularly for workforce and family housing needs.

## 8.0 INDUSTRY-SPECIFIC SEARS

This section reviews the relevant industry-specific SEARs and includes commentary on how the Applicant intends to respond to each item, where applicable. Refer to **TABLE 6** for further details.



# WILLOWTREE PLANNING



**TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING**

| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Documentation                       | Applicant Comments                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Statutory Context</b> <ul style="list-style-type: none"> <li>Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies, guidelines and planning circulars.</li> <li>Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.</li> <li>Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences.</li> <li>Address the requirements of any approvals applying to the site, including any concept approval, any endorsed or draft master plan, precinct plan or any recommendation from Gateway determination.</li> <li>Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole.</li> <li>If affordable housing is being proposed, provide the name and ABN of the registered community housing provider that will be responsible for managing the affordable housing component, along with documentation confirming the provider's agreement to this responsibility.</li> </ul> | Address in EIS.                     | <p>Noted – the proposal will address the requirement of this item.</p> <p>Discussion within the EIS will include zoning, permissibility and the associated approval pathway as outlined above.</p> <p>The proposal is consistent with the controls of the Housing SEPP and provisions for infill affordable housing and the LMR.</p> |
| <b>2. Estimated Development Cost and Employment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Estimated Development Costs Report. | An Estimated Development Cost Report will support the proposal.                                                                                                                                                                                                                                                                      |



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

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| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                    |                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Documentation      | Applicant Comments                                                                                                                                                                                                                                                                        |
| <ul style="list-style-type: none"> <li>Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report.</li> <li>As applicable, the EDC Report must separately specify the EDC of: <ul style="list-style-type: none"> <li>the residential component of the development.</li> <li>the tenant component of the built-to-rent development.</li> <li>the seniors housing component of the development.</li> </ul> </li> </ul>                                                                                                                             |                    |                                                                                                                                                                                                                                                                                           |
| <b>3. Contributions and Public Benefit</b> <ul style="list-style-type: none"> <li>Address the requirements any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind agreement. and include details of any proposal for further material public benefit.</li> <li>Where a voluntary planning agreement is proposed, prepare a draft planning agreement in accordance with the Planning agreements – Practice note- February 2021.</li> </ul>                                                                                                                             | Address in EIS.    | Noted – the proposal will address the requirement of this item.<br>The proposal provides a minimum of 15% affordable housing as required to access the 30% bonus under the Infill affordable housing provisions of the Housing SEPP. These units will be dedicated for at least 15 years. |
| <b>4. Engagement</b> <ul style="list-style-type: none"> <li>Demonstrate that engagement and consultation activities have been undertaken in accordance with the Undertaking Engagement Guidelines for State Significant Projects and identify how issues raised, and feedback received have been considered in the design of the project. <ul style="list-style-type: none"> <li>If the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&amp;A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of</li> </ul> </li> </ul> | Engagement report. | Noted – the proposal will be supported by an Engagement Report, in accordance with the <i>Undertaking Engagement Guidelines for State Significant Projects</i> .                                                                                                                          |



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| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Documentation                                                                                                                                                                                                                                                                                                                       | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| the EP&A Act, the agency relevant to that approval or authorisation must be consulted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>5. Design Quality</b> <ul style="list-style-type: none"> <li>Demonstrate how the development will achieve: <ul style="list-style-type: none"> <li>design excellence in accordance with any applicable EPI provisions.</li> <li>good design in accordance with the seven objectives for good design in <i>Better Placed</i>.</li> </ul> </li> <li>Demonstrate that the development: <ul style="list-style-type: none"> <li>where required by an EPI or concept approval, or where proposed, has been subject to a competitive design process, carried out in accordance with an endorsed brief and Design Excellence Strategy; or</li> <li>in all other instances, has been reviewed by the State Design Review Panel (SDRP) where required under the NSW SDRP: Guidelines for Project Teams.</li> </ul> </li> <li>Recommendations of the jury and Design Integrity Panel (where a competitive design process has been held) or the SDRP are to be addressed prior to lodgement.</li> </ul> | <p>Address in EIS.<br/>If required:</p> <ul style="list-style-type: none"> <li>Design Excellence Strategy (where design excellence is required by an EPI)</li> <li>Competition Report (where a competitive design process has been held)</li> <li>Design Review Report (where the project has been reviewed by the SDRP)</li> </ul> | <p>The development demonstrates design excellence through the following:</p> <ul style="list-style-type: none"> <li>The proposed building exhibits a high standard of architectural design, that responds to the site's context and contributes positively to the public domain and streetscape character.</li> <li>The development achieves a coherent relationship with the street, adjoining properties, and the broader locality, demonstrating an integrated response to built form, landscape, and the public realm.</li> <li>The development has been assessed against the Apartment Design Guide (ADG) and other applicable design guidelines, demonstrating compliance with the relevant design criteria for residential flat buildings.</li> <li>The proposed density represents an efficient use of a well-located, accessible, and serviced urban site. The level of density proposed is appropriate to the site's location within an accessible area in close proximity to Manly Wharf and the Manly local centre, where higher density residential development is both anticipated and encouraged.</li> <li>The development delivers a high standard of residential amenity for future occupants.</li> </ul> <p>Design quality will be further addressed in the EIS.</p> |
| <b>6. Built Form and Urban Design</b> <ul style="list-style-type: none"> <li>Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Architectural Drawings</p> <p>Design Report</p> <p>Survey Plan</p>                                                                                                                                                                                                                                                               | <p>The proposed built form has been carefully considered in response to the site's characteristics, surrounding context, and the existing and future character of the locality. The design achieves an appropriate balance between maximising the development potential of the amalgamated site and delivering a high-quality outcome that is sensitive to its setting. Where the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |





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**TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING**

| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Documentation                                                                                                  | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>. Where relevant explain and illustrate the application of any bonuses under an EPI.</li> <li>If relevant, provide an assessment of the development against: <ul style="list-style-type: none"> <li>the design principles for seniors housing set out in Schedule 8 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and the Seniors Housing Design Guide.</li> <li>the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP and the Apartment Design Guide (ADG). This should include a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria.</li> </ul> </li> <li>If affordable housing is proposed, provide a floorplan outlining the gross floor area and dwellings that are provided as affordable housing.</li> </ul> | <p>Schedule of Colours, Materials and Finishes</p> <p>Design Verification Statement</p>                        | <p>site interfaces with the heritage conservation area and adjoining heritage items, the design adopts a restrained architectural language that is complementary to, without replicating, the character of the heritage context.</p> <p>The height is compliant and commensurate with the scale of development in the surrounding area and does not represent an unreasonable departure from the existing or anticipated future character of the locality.</p> <p>Adequate separation is provided between the proposed building and adjoining properties to protect the amenity of neighbouring residents. An Apartment Design Guide (ADG) compliance assessment will be provided with the EIS.</p> <p>A floorplan outlining the gross floor area and dwellings that are proposed to be provided as affordable housing will be prepared.</p> |
| <p><b>7. Environmental Amenity</b></p> <ul style="list-style-type: none"> <li>Assess amenity impacts on the surrounding locality, including solar access, visual privacy, view loss and view sharing, as well as wind, lighting and reflectivity impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.</li> <li>Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during winter solstice) at hourly intervals between 9am and 3pm, comparing the proposed development, existing situation and where applicable, a development with no bonuses applied.</li> </ul>                                                                                                                                                           | <p>Shadow Diagrams</p> <p>Chapter 4 Housing SEPP Assessment (ADG)</p> <p>If required: View Impact Analysis</p> | <p>Noted – the proposal will address the requirements of this item through the listed reports.</p> <p>Detailed solar access diagrams will be provided with the application.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>8. Visual Impact</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Visual Impact Analysis</p>                                                                                  | <p>Noted – The proposal will be informed by photomontages and perspective drawings showing the proposed and likely future</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



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| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Documentation                                                                                                    | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <ul style="list-style-type: none"> <li>Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.</li> <li>If the proposal would result in significant visual impact not anticipated by the planning controls, provide a visual impact assessment that addresses the visual impacts of the development on the existing catchment.</li> </ul>                                                                                                                                            | If required: Visual Impact Assessment                                                                            | development. Given the Site is located within the Foreshore Scenic Protection Area under Cl. 6.9 of the MLEP 2013, the Visual Impact Assessment will specifically address impacts on the visual amenity of the coastal foreshore, measures to protect the scenic qualities of the coastline, and the suitability of the development having regard to its type, location and design in relation to the foreshore.                          |
| <b>9. Transport</b> <ul style="list-style-type: none"> <li>Provide a Transport Impact Assessment (TIA) in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW.</li> <li>If the construction of the development would cause interruptions to regular pedestrian and transport routes (including public transport, active transport or general traffic), a preliminary Construction Traffic (or Transport) Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.</li> </ul> | Transport Impact Assessment.<br><br>If required: Preliminary Construction Traffic (or Transport) Management Plan | The Site's location within close walking distance of Manly Wharf will provide additional housing within a highly accessible location. Car parking will comply with the non-discretionary development standards under the Housing SEPP.<br><br>A Traffic Impact Assessment will be prepared in accordance with the Guide to Transport Impact Assessment (GITA).<br><br>The proposed development provides 2 levels of basement car parking. |
| <b>10. Noise and Vibration</b> <ul style="list-style-type: none"> <li>Provide a noise and vibration impact assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.</li> </ul>                                                                                                                                   | Noise and Vibration Impact Assessment.                                                                           | Noted – the proposal will be supported by a Noise and Vibration Impact Assessment.                                                                                                                                                                                                                                                                                                                                                        |
| <b>11. Water Management</b> <ul style="list-style-type: none"> <li>Detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development (stormwater and wastewater).</li> <li>Demonstrate how the development complies with council's drainage requirements and identify proposed</li> </ul>                                                                                                                                                                                                                                                     | Integrated Water Management Plan                                                                                 | Noted – the proposal will address the requirements of this item.                                                                                                                                                                                                                                                                                                                                                                          |



## REQUEST FOR INDUSTRY-SPECIFIC SEARS

Infill Affordable Residential SSD

10-12 Victoria Parade, Manly

| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Documentation                                                                                                                                                                                                               | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| stormwater treatment and water quality management measures to minimise adverse environmental impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>12. Ground and Groundwater Conditions</b> <ul style="list-style-type: none"> <li>Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site and including soil erosion.</li> <li>Where required provide a Groundwater Impact Assessment in accordance with relevant Groundwater Guidelines. If the proposed development is on land identified as having high salinity or acid sulfate soil potential in an EPI provide a Salinity Management Plan or Acid Sulfate Soil Management Plan that includes appropriate management measures and strategies.</li> </ul> | Geotechnical Assessment<br><br>If required: Groundwater Impact Assessment<br><br>Salinity Management Plan<br><br>Acid Sulfate Soils Management Plan                                                                         | Noted – the proposal will be supported by a Geotechnical Assessment.<br><br>The site is mapped as Class 4 Acid Sulfate Soils. This will be addressed by an Acid Sulfate Soils Management Plan.                                                                                                                                                                                                                                                                                                                                                                          |
| <b>13. Contamination and Remediation</b> <ul style="list-style-type: none"> <li>In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.</li> </ul>                                                                                                                                                                                                                                                                                     | Preliminary Site Investigation.<br>If required: <ul style="list-style-type: none"> <li>Detailed Site Investigation.</li> <li>Remedial Action Plan.</li> <li>Preliminary Long-term Environmental Management Plan.</li> </ul> | Noted – the proposal will be supported by a Preliminary Site Investigation (as a minimum).                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>14. Trees and Landscaping</b> <ul style="list-style-type: none"> <li>Provide a landscape plan, that:               <ul style="list-style-type: none"> <li>details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area).</li> <li>provides evidence that opportunities to retain significant trees have been explored and/or inform the plan.</li> </ul> </li> </ul>                                                                                                                       | Landscape Plan<br><br>If required: Arboricultural Impact Assessment                                                                                                                                                         | Noted — the proposal will be supported by a Landscape Plan and, if required, an Arboricultural Impact Assessment.<br>The proposed landscape design includes the following key elements: <ul style="list-style-type: none"> <li>567m<sup>2</sup> of landscaped areas (45% of site area);</li> <li>163m<sup>2</sup> of deep soil zone (13% of site area), located primarily at the rear of the Site in accordance with Cl. 19(2)(c) of the Housing SEPP; and</li> <li>Perimeter planting along the site boundaries will provide screening and canopy coverage.</li> </ul> |



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| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Documentation                                              | Applicant Comments                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>If the proposal involves impacts to trees, provide an Arboricultural Impact assessment that assesses the number, location, condition and significance of trees to be removed and retained including: <ul style="list-style-type: none"> <li>any existing canopy coverage to be retained on-site.</li> <li>tree root mapping. if the proposal involves significant impacts to tree-protection zones of retained trees identified as being significant</li> </ul> </li> </ul>                                                                                                                     |                                                            |                                                                                                                                                                                                                       |
| <b>15. Ecologically Sustainable Development (ESD)</b> <ul style="list-style-type: none"> <li>Identify how ESD principles (as defined in section 193 of the EP&amp;A Regulation) are incorporated in the design and ongoing operation of the development.</li> <li>Where relevant, provide an assessment of the development against the standards for non-residential development set out in Chapter 3 of State Environmental Planning Policy (Sustainable Buildings) 2022.</li> </ul>                                                                                                                                                  | ESD Report.                                                | ESD principles (as defined in section 193 of the EP&A Regulation) will be incorporated in the design and ongoing operation of the development.                                                                        |
| <b>16. Biodiversity</b> <ul style="list-style-type: none"> <li>Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020. OR</li> <li>If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.</li> </ul> | Biodiversity Development Assessment Report or BDAR Waiver. | The Site is not mapped as containing any Biodiversity values and the proposal will not result in remove of any significant trees. Accordingly, a Biodiversity Development Assessment Report Waiver will be requested. |
| <b>17. Waste Management</b> <ul style="list-style-type: none"> <li>Provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste, including in</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                               | Waste Management Plan                                      | Noted – A Waste Management Plan will be prepared to include both construction and operational waste management.                                                                                                       |



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| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Documentation                                                                                 | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>accordance with any council waste management requirements.</p> <ul style="list-style-type: none"> <li>Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>18. Social Impact</b></p> <ul style="list-style-type: none"> <li>The EIS must consider social impacts and, should any significant social impacts be identified, a Social Impact Assessment must be prepared in accordance with the Social Impact Assessment Guideline for State Significant Projects.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Address in EIS If required: Social Impact Assessment in accordance with the guidelines</p> | <p>The proposal will be supported by a Social Impact Assessment incorporated into the Engagement Report, and prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Developments</i>.</p>                                                                                                                                                                                                                                              |
| <p><b>19. Flooding Risk</b></p> <ul style="list-style-type: none"> <li>Identify the flood planning area and level as set out in the relevant EPI and other supporting documents to determine; <ul style="list-style-type: none"> <li>The flood extent and velocity up to the Probable Maximum Flood and risk on-site having regard to adopted flood studies and, floodplain risk management studies and plans</li> <li>The site access and egress routes</li> <li>the potential effects of climate change,</li> <li>any relevant provisions of the NSW Flood Risk Management Manual, and any other relevant guidelines</li> </ul> </li> <li>Where the development is occurring on flood prone land a flood impact and risk assessment (FIRA) must be prepared having regard to the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01. When determining the scope and category of the FIRA the requirements outlined in the FIRA guide must be considered.</li> <li>Detail any flood risk management measures that are to be incorporated as part of the development having</li> </ul> | <p>If required: Flood Impact and Risk Assessment (FIRA).</p>                                  | <p>The proposal will be supported by a Flood Impact Risk Assessment. Although the Site is flood affected, there are two existing residential flat buildings located on the Site which demonstrates that residential use has long been established and is an accepted land use in this location. Flood affectation does not represent a constraint that would preclude approval of the proposed development. These matters will be comprehensively addressed in the FIRA.</p> |



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| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Documentation                                                             | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| regard to relevant guidelines (including any design solutions, flood modification measures, property modification measures, operational procedures or Flood Emergency Response Plan).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>20. Bush Fire Risk</b> <ul style="list-style-type: none"> <li>If the development is on mapped bush fire prone land, or a bush/grass fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | If required: Bush Fire Assessment.                                        | The proposal is not located on bushfire prone land, therefore, not required.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>21. Aboriginal Cultural Heritage</b> <ul style="list-style-type: none"> <li>Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: <ul style="list-style-type: none"> <li>Identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application, or</li> <li>Providing an initial assessment of the potential impacts.</li> </ul> </li> <li>If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which: <ul style="list-style-type: none"> <li>Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site. <ul style="list-style-type: none"> <li>Is prepared in accordance with relevant guidelines.</li> </ul> </li> </ul> </li> </ul> | If required:<br><br>Aboriginal Cultural Heritage Assessment Report.       | A search of the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) has shown that no Aboriginal sites are recorded the Site. One site was recorded within 200m of the site. Having regard for the disturbed nature of the existing sites and their long association with residential uses, it is not considered that an Aboriginal Cultural Heritage Assessment is required for development the Site. An Aboriginal Heritage report will be prepared to investigate this item. |
| <b>22. Environmental Heritage</b> <ul style="list-style-type: none"> <li>Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | If required:<br>Statement of Heritage Impact<br>Archaeological Assessment | <p>The Site is located within a Heritage Conservation Area, and adjoins local heritage listed buildings.</p> <p>The proposal has been designed with due regard to the heritage context. It is considered that the proposed development will not result in any adverse impact on the heritage significance of the</p>                                                                                                                                                                               |





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| TABLE 6: INDUSTRY-SPECIFIC SEARS - HOUSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Issue and Assessment Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Documentation                                | Applicant Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| (where required), in accordance with the relevant guidelines.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                              | <p>HCA or the adjoining heritage listed buildings, and the proposal is capable of being supported from a heritage perspective.</p> <p>A Statement of Heritage Impact will be prepared by a suitably qualified heritage consultant to accompany the proposal.</p> <p>The Site adjoins local heritage listed trees. The design of the proposed driveway will ensure protection and the ongoing viability of adjacent trees. Swept paths will be designed to ensure trees and their root zones are not impacted, and this will be informed by arborist advice and detailed within the EIS</p> |
| <p><b>23. Public Space</b></p> <ul style="list-style-type: none"><li>▪ If public space is proposed as part of the development, demonstrate how the development:<ul style="list-style-type: none"><li>○ maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department.</li><li>○ provides accessible public space.</li><li>○ maximises permeability and connectivity.</li><li>○ maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection.</li><li>○ maximises street activation.</li><li>○ minimises potential vehicle, bicycle and pedestrian conflicts.</li></ul></li></ul> | <p>If required:</p> <p>Public Space Plan</p> | <p>Noted – the proposal will not require a public space plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |



# WILLOWTREE PLANNING



## 9.0 CONCLUSION

The proposal involves the demolition of two existing residential flat buildings and construction of a nine (9) storey residential flat building comprising 23 dwellings, including five affordable housing units, at 10-12 Victoria Parade, Manly. The development has an EDC of \$79,390,753 and is located within the R3 Medium Density Residential zone, within close walking distance of Manly Wharf and Manly Town Centre.

The proposal is permissible with consent under the MLEP 2013 and satisfies the definition of State Significant Development pursuant to Clause 26A, Schedule 1 of the Planning Systems SEPP, being in-fill affordable housing with an EDC exceeding \$75 million within the Eastern Harbour City.

The proposed building height of 28.6m and FSR of 2.86:1 is consistent with the stacked permissible development standards under the LMR provisions of the Housing SEPP and the 30% in-fill affordable housing bonus. The proposal does not constitute Designated Development, does not involve a concept DA, and does not give rise to complex environmental impacts requiring Project-Specific SEARs.

The proposal is considered to meet the eligibility criteria for industry-specific SEARs. As such, it is requested that NSW DPHI issue formal SEARs for the preparation of an EIS for this proposal as SSD.

Should you require any further information, please do not hesitate to contact Amy Vaughan, Associate Director on [avaughan@willowtp.com.au](mailto:avaughan@willowtp.com.au) or Chris Wilson of Willowtree Planning Pty Ltd.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Wilson'.

Chris Wilson  
Director  
Willowtree Planning Pty Ltd

Enclosed –  
Preliminary Architectural Plans



SYDNEY | BRISBANE