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URBIS

STATEMENT OF ENVIRONMENTAL EFFECTS

Mounties Care Extension -
Harbord Diggers Club

Prepared for
MOUNTIES GROUP
12 August 2021

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1. INTRODUCTION

This Statement of Environmental Effects (**SEE**) has been prepared on behalf of Mt Pritchard and District Community Club Ltd (**Mounties Group**) (the **Applicant**), in support of a Development Application (**DA**) for the change of use of an existing club space to a health services facility at 80 Evans Street, Freshwater (**Harbord Diggers Club**).

Development approval (DA2020/1238) was granted by Northern Beaches Council in November 2020 for the change of use of an existing club space (tenancy MS6) to a health service facility. This development application seeks to expand this approved health service facility into the neighbouring tenancy (MS5). The proposed use of the additional tenancy as a health service facility will add three consulting rooms, resulting in a total of six consulting rooms across the combined tenancy.

Development consent is sought in accordance with Part 4 of the *Environmental Planning and Assessment Act 1979*.

This SEE is structured as follows:

- **Section 2** – Site Context: identifies the site and describes the existing development and local and regional context.
- **Section 3** – Project History: outlines the approvals history.
- **Section 4** – Proposed Development: provides a detailed description of the proposal including the construction and operational phases.
- **Section 5** – Section 4.15 Assessment: provides an assessment of the proposal against the matters of consideration listed in Section 4.15 of the EP&A Act.
- **Section 6** – Conclusion: provides an overview of the development assessment outcomes and recommended determination of the DA.

This SEE is accompanied by the following supporting documentation.

Table 1 – List of Supporting Information

Document	Consultant	Appendix
Architectural Plans	Mounties Group	Appendix A
Traffic and Parking Report	Arup	Appendix B
Waste Management Plan	Harbord Diggers Facility Management Team	Appendix C

2. SITE AND SURROUNDING CONTEXT

2.1. THE SITE

The site is located at 88 Evans Street, Freshwater and is legally described as Lot 20 in Deposited Plan 1242304. The site has an approximate area of 1.58 hectares and is generally flat.

The site is bounded by Carrington Parade to the north, McKillop Park and car park (south), Lumsdaine Drive to the east and Evans Street to the west. The site is outlined in red below.

Figure 1 – Aerial Photograph of the Site



Source: SixMaps and Urbis

2.2. SURROUNDING CONTEXT

The site is located in a prominent location on the coastal headland between Freshwater and Curl Curl Beaches. It is located amongst a mix of residential development of varying forms and density. The site is located in close proximity to local shopping facilities and services in Freshwater Village, which is centred on Lawrence Street and Moore Road, approximately 700m from the site.

3. PROJECT HISTORY

The Harbord Diggers Club has been subject to multiple Development Applications to facilitate the long term redevelopment as an intergenerational club facility. A summary of the key applications approved for the site are provided below.

DA2013/0412- Stage 1 Development Approval

Approval was granted by the Sydney East Joint Regional Planning Panel (JRPP) on 16th September 2013 for the building envelopes of the redevelopment of the site for the purpose of an intergenerational club comprising seniors housing, new club facility, child care, gymnasium, community centre and respite care. The consent approved building envelopes for four (4) new buildings and the adaptive re-use of the existing Club building. No approval was given for physical works to commence on the site under DA2013/0412.

DA2014/0875-Stage 2 Development Approval

Approval was granted for physical works on the site generally in accordance with the Stage 1 building envelopes by the JRPP on 1st December 2014. The proposed works included to four (4) three storey buildings (known as Buildings A, B, C and D), the adaptive re-use of the existing Club building (known as Buildings E and F), new club facilities, 97 independent seniors living units across the six buildings and Car parking within common basement levels. The consent was stated as:

Demolition and Excavation works and Construction of Seniors Housing, Registered Club, Childcare Centre and associated carparking and landscaping (Harbord Diggers Club site).

This application was subsequently modified under Section 4.55 (formerly S.96) by Mod2015/0152 (23 November 2015), Mod2016/0298 (5 January 2017) and Mod2017/0063 (1 June 2017).

DA2020/1238 – Mounties Health service Facility Approval

Approval was granted by Northern Beaches Council in November 2020 for the change of use of an existing club space (MS6) to a health service facility.

This development application seeks to expand this approved health service facility into the neighbouring tenancy.

4. PROPOSED DEVELOPMENT

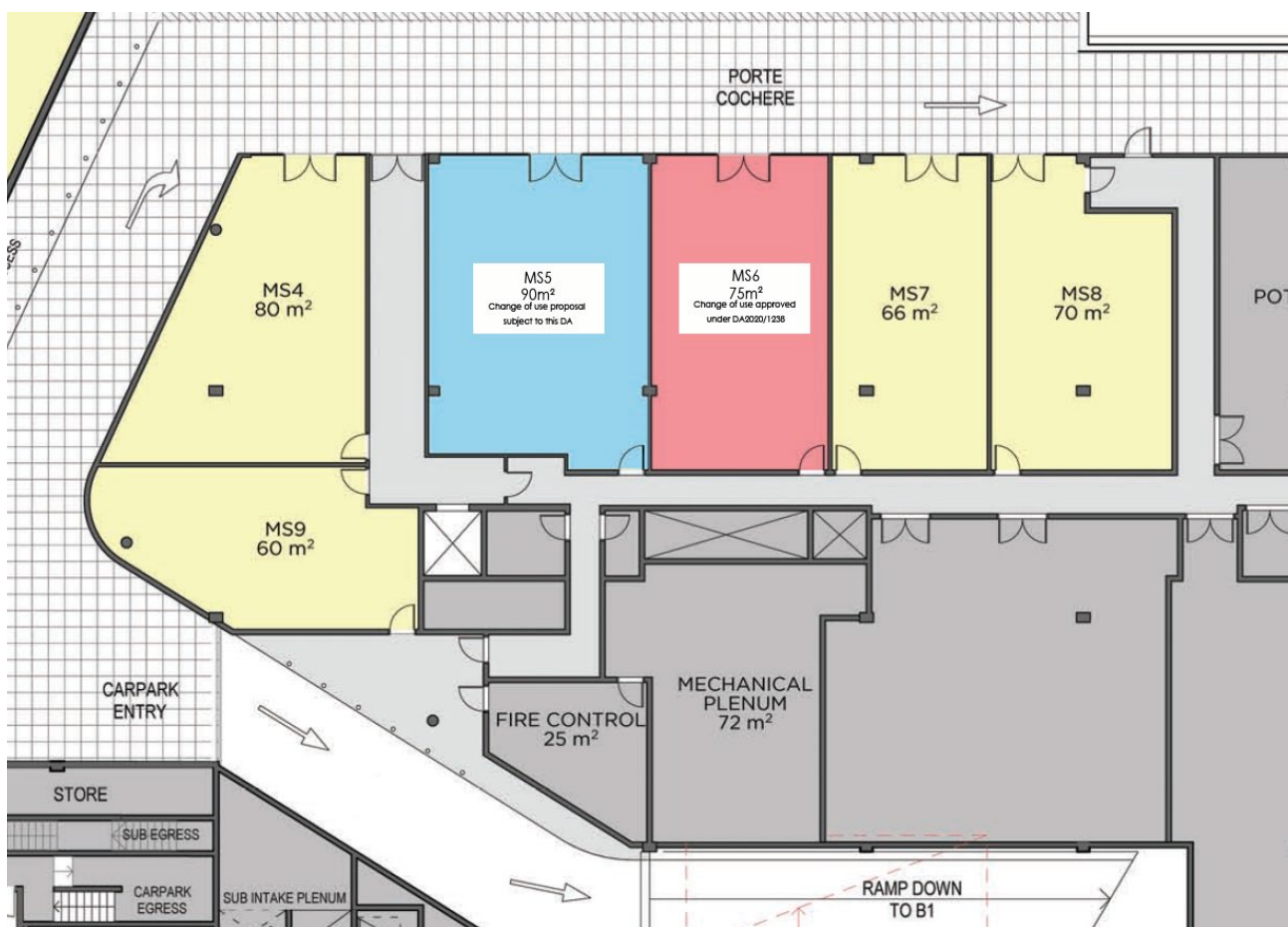
4.1. OVERVIEW

Development approval (DA2020/1238) was granted by Northern Beaches Council in November 2020 for the change of use of an existing club space (tenancy MS6) to a health service facility. This development application seeks to expand this approved health service facility into the neighbouring tenancy (MS5).

The proposal comprises the change of use only of an existing area 90m² in size, within the Harbord Diggers Club to a health services facility, known as Mounties Care. Mounties Care is a health and well being service offered to Club members. The combined facility (MS 5 and MS6) will have six consulting rooms with a variety of healthcare specialists providing consultation and non-surgical procedures for Harbord Diggers Club members. The subject space is one of many 'tenancies' that form a row of supporting club services and amenities near the main reception/Club drop off area.

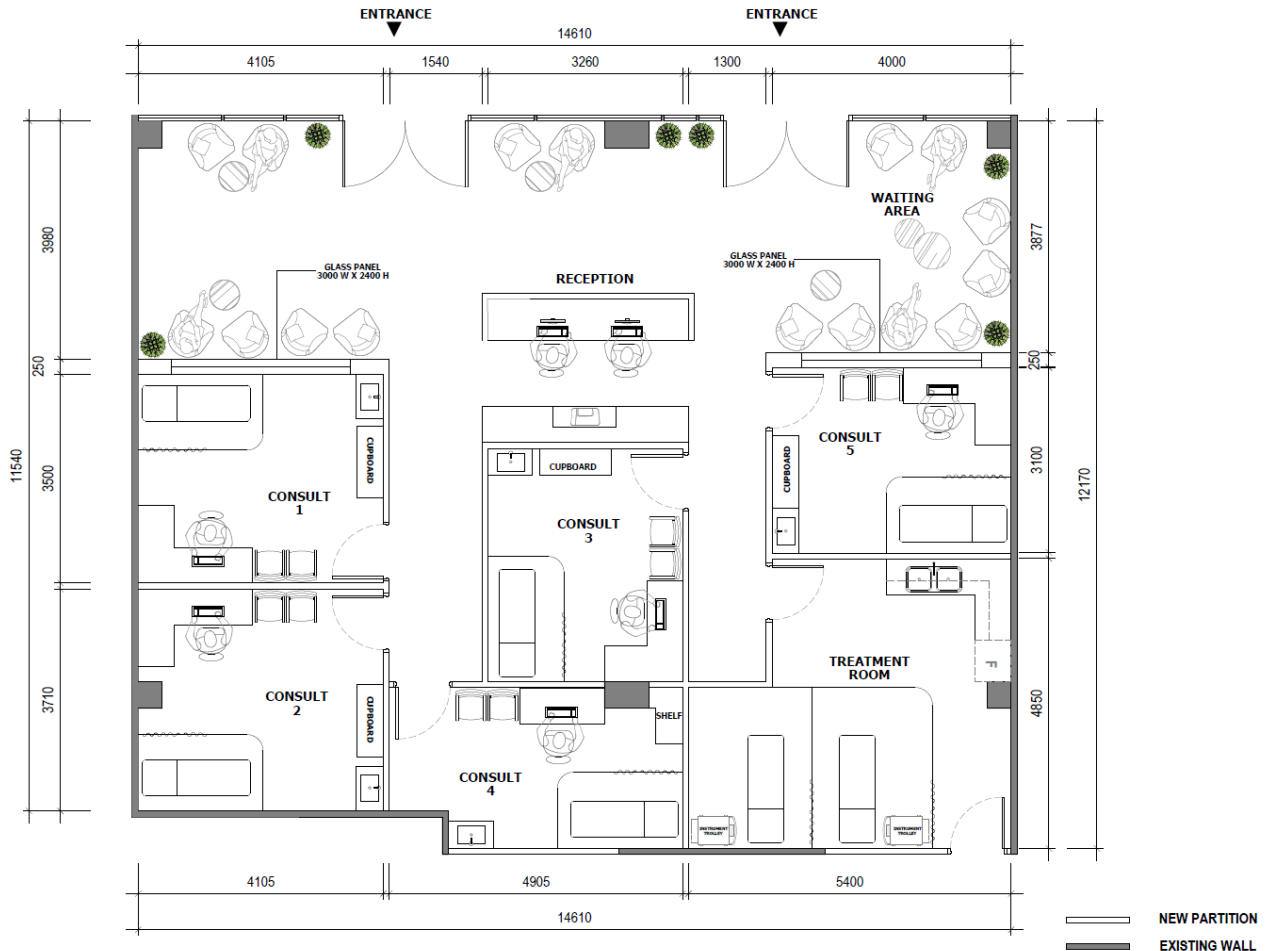
A set of architectural drawings is attached as **Appendix A**. A reduced sized extract of the site plan and internal layout plan are provided below.

Figure 2 – Proposed Site Plan



Source: Mounties Group

Figure 3 – Indicative Internal Layout Plan



Source: Design Doctors Australia

4.2. INTERNAL FIT OUT

The internal fit-out will be subject to a complying development certificate once the development application has been approved. This CDC will approve the internal fitout of the combined tenancies.

4.3. PARKING AND ACCESS

Car parking will be accommodated in the existing car parking area accessed via Evans Street. The Club's existing loading facilities will be utilised to service the expanded tenancy.

4.4. OPERATIONAL DETAILS

4.4.1. Proposed Services

The enlarged Mounties Care will provide six consulting rooms with a variety of healthcare specialists providing consultation and non-surgical procedures for Harbord Diggers Club members. The services will include:

- Medical Services
- Exercise Physiology, physiotherapy and dietetics
- Podiatry
- Aged Care Services

- Pathology
- Massage Therapy
- Mental Health services

4.4.2. Hours of Operation

It is proposed to maintain the approved operating hours under DA2020/1238. The proposed operating hours are:

- Monday to Friday – 7:00am to 7:00pm
- Saturday – 8:00am to 3:00pm
- Sunday and Public Holidays – 9:00am to 12:00pm

4.4.3. Employees

Initially, there will be an additional three practitioners and one receptionist at the health service facility, reflective of the operation under DA2020/1238. Mounties Group would seek to expand to a total of six practitioners at Mounties Care dependent on member demand.

4.4.4. Waste Management

A Waste Management Plan has been prepared by Mounties Group and is provided at **Appendix C**. The health facility's Waste Management Plan will include a waste segregation policy that all clinicians and specialists practicing within the rooms must follow. The waste will be segregated into 'general waste (not hazardous), clinical waste (hazardous) and pharmaceutical waste.

The Harbord Diggers will engage a suitably qualified Waste Management Company that can provide a range of services to dispose of all clinical and pharmaceutical waste.

A Waste Management Committee will be appointed and include key stakeholders from both the Harbord Diggers Corporate Services Department and the medical consultatory firm engaged to manage the Health Consulting Rooms.

5. SECTION 4.15 ASSESSMENT

5.1. ENVIRONMENTAL PLANNING INSTRUMENTS

5.1.1. State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of key infrastructure across the state. Division 10 provides provisions for the development of health services facilities. The proposed development is reliant on the provisions of the ISEPP to permit the proposed health facility.

The following table assesses the compliance of the proposal in accordance with the relevant clauses within the SEPP. Pursuant to Clause 57, the proposed use as a “health services facility” is permissible on the site.

Table 2 – Compliance with Infrastructure SEPP

Clause	Provision	Proposed	Complies/ Permissible
Division 10 Health Services Facilities 57 – Development permitted with consent	Development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone. The R2 Low Density Residential zone is a prescribed zone.	The applicant is seeking development consent for the change of use to a health service facility.	Yes

5.1.2. Warringah Local Environmental Plan 2011

Warringah Local Environmental Plan 2011 (WLEP) is the primary environmental planning instrument applying to the site and the proposed development. The site is zoned R2 Low Density Residential in accordance with the WLEP.

The proposed development is consistent with the zone objectives as outlined below:

- *To provide for the housing needs of the community within a low density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To ensure that low density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah.*

The proposed health service facility will provide services to meet the health service needs of residents.

The proposed development is defined as a health services facility in accordance with the WLEP. Health services facilities are not permitted in the R2 low density residential zone.

However, by virtue of Clause 57 of the Infrastructure SEPP, the proposed use is permissible with consent. The following table assesses the compliance of the proposed development with other relevant clauses in the WLEP.

Table 3 – WLEP Compliance Table

Clause	Provision	Proposed	Complies
Clause 2.5 – Additional Permitted Uses for particular land	<i>The site is subject to Schedule 1 – Additional Permitted Uses which specifically permits, “Development for the purposes of recreation facilities (indoor), recreation facilities (outdoor) (but only if the facility, whether indoor or outdoor, operates in conjunction with a registered club) and registered clubs is permitted with consent.</i>	The proposal is for a health services facility within Harbord Diggers Club.	N/A
Clause 4.1 – Minimum Subdivision Lot Size	The minimum lot size is 450sqm.	The proposal does not seek to subdivide the existing lot.	N/A
Clause 4.3 – Height of Building	The maximum building height at the site is 8.5m.	The proposal does not seek to construct a new building.	Yes
Clause 4.4 – Floor Space Ratio	There is no prescribed floor space ratio at the site.	N/A	N/A
Clause 5.10 – Heritage Conservation	The site adjoins heritage item I645, Duke Kahanamoku Statue and Memorial Park.	The proposed works are internal and will not impact the nearby heritage item.	Yes

5.2. DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No draft environmental planning instruments apply to the site. Northern Beaches Council have recently released a LEP/DCP Discussion Paper which is on exhibition until August 2021.

5.3. DEVELOPMENT CONTROL PLAN

Warringah Development Control Plan 2011 (Warringah DCP) provides detailed planning controls relevant to the site and the proposal. An assessment against the relevant controls is provided in the table below. Considering the proposed health service facility will be located within an existing building and no fit-out is sought as part of the DA, many provisions do not apply to the site.

Table 4 – Warringah DCP Compliance Table

Control	Compliance	Comment
C9 Waste Management All relevant Development Applications must be accompanied by a Waste Management Plan.	Yes	The development application is accompanied by a Waste Management Plan (refer to Appendix C).

Control	Compliance	Comment
<p>Appendix 1 Car Parking Requirements</p> <p>Health consulting room: 3 spaces per room used to see patients (This may be reduced if not all rooms will be in concurrent operation).</p>	Yes	<p>A Traffic and Parking Statement has been prepared by Arup and is provided at Appendix B.</p> <p>Arup conclude that the proposed expansion of Mounties Care from three to six consulting rooms would require nine additional parking spaces.</p> <p>The existing parking provision at the Harbord Diggers Club provides a minimum of 180 spaces at all times.</p> <p>Therefore, the existing parking supply at the Harbord Diggers Club is able to accommodate the additional parking demand of the Mounties Care expansion. See also Section 5.6.1 below.</p>

Based on the above, it is considered that the proposal complies with the relevant provisions within the DCP.

5.4. PLANNING AGREEMENT

No planning agreements are relevant to this proposal.

5.5. REGULATIONS

This application has been prepared in accordance with the relevant provisions of the *Environmental Planning and Assessment Regulations 2000*.

5.6. LIKELY IMPACTS OF THE PROPOSAL

5.6.1. Traffic and Parking

A Traffic and Parking Statement has been prepared by Arup and is provided at **Appendix B**. The proposal does not seek to modify vehicle access or increase the number of parking spaces for the proposed health services facility.

Arup conducted a parking study in March 2020 to examine the ability of the existing car park to adequately provide parking for members including undertaking a club parking occupancy survey. This showed sufficient capacity at peak times at around 50- 70% (or minimum 180 spaces).

Warringah DCP 2011 stipulates a rate of three parking spaces per health consulting room. The proposed expansion of the Mounties Care from three to six consulting rooms would require nine additional parking spaces.

The existing parking provision at the Harbord Diggers Club provides a minimum of 180 available spaces at all times. Therefore, the existing parking supply at the Harbord Diggers Club is able to accommodate the additional parking demand of the Mounties Care expansion.

5.6.2. Waste Management

A Waste Management Plan (**WMP**) has been prepared by Mounties Care and is provided at **Appendix C**. A summary of the construction and occupation waste management plans is provided below.

Construction waste

Active site management during the construction phase between the Harbord Diggers Facility Management Team and appointed builder will ensure all waste and recyclable materials are disposed of appropriately. Adaptive reuse will be considered and actioned where possible.

Occupation waste

The health facility Waste Management Plan will include a waste segregation policy that all clinicians and specialists practicing within the rooms must follow. The waste will be segregated into 'general waste (not hazardous), clinical waste (hazardous) and pharmaceutical waste.

A Waste Management Committee will be appointed and include key stakeholders from both the Harbord Diggers Corporate Services Department and the medical consultatory firm engaged to manage the Health Consulting Rooms. A Waste Management Plan will be documented and reviewed annually.

Disposal of Clinical and Pharmaceutical Waste

Harbord Diggers will devise a Clinical Waste and Pharmaceutical Disposal policy that all clinicians and specialists practicing within the rooms must follow. This will be conducted in consultation with medical professionals once engaged and prior to the opening of the Clinic. All clinic policies will follow NSW Health guidelines outlined in the Clinical and Related Waste Management for Health Services (PD2017_026). The Harbord Diggers will engage a suitably qualified Waste Management Company that can provide a range of services to dispose of all clinical and pharmaceutical waste for the entire use across the two tenancies.

5.7. SUITABILITY OF THE SITE

The site is considered highly suitable for the proposed development for the following reasons:

- The site is situated in the R2 Low Density Residential zone that prohibits the proposed use. However the R2 zone is identified as a prescribed zone, pursuant to Clause 57 of the I SEPP and as such the proposed health services facility is permissible by virtue of the ISEPP. Regardless, the proposal meets the objectives of the R2 zoning under WLEP as the objectives enable other land uses that provide facilities or services to meet the day to day needs of residents. This health facility is an essential service to support the growing health service needs of the Harbord Diggers members.
- Additional accessible health service facilities are essential for the ageing population on the Northern Beaches.
- The proposed DA is adjacent to an existing approved health service tenancy and enhances this current offering.
- The traffic impact assessment prepared by Arup found that Harbord Diggers has adequate existing car parking spaces to accommodate any extra visits generated by the health service facility.

5.8. SUBMISSIONS

It is acknowledged that submissions arising from the public notification of this application will need to be assessed by Council.

5.9. PUBLIC INTEREST

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with the Infrastructure SEPP, the Warringah LEP 2011 objectives and the Warringah DCP 2011.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposed health service facility is within the existing building on the Harbord Diggers land and will provide additional health service in an LGA with an ageing population.

6. CONCLUSION

The proposed expansion of the Mounties Care health services facility has been assessed in accordance with Section 4.15 of the EP&A Act and is considered appropriate for the site and locality:

- **The proposal is highly suitable for the site:** the land is identified as a prescribed zone in the Infrastructure SEPP, permitting the use of a health services facility at the site pursuant to Clause 57 of the ISEPP. The proposed health services facility is consistent with the zone objectives of the Warringah LEP, as the proposal is for the provision of services to meet the day to day needs of residents.
- **The proposal satisfies the applicable planning controls and policies:** the proposal satisfies the objectives of the Infrastructure SEPP, Warringah LEP and Warringah DCP.
- **The proposal will not result in any adverse environmental impacts:** it has been demonstrated that the proposal will not change the external built form of the Harbord Diggers (as use is only sought) and the existing car park can accommodate the additional traffic and car parking.
- **The proposal will result in positive social and economic impacts:** the proposal will provide additional health service services to an ageing population in the Northern Beaches. These wellbeing and lifestyle programs aim to improve the quality of life of the members.
- **The proposal is in the public interest:** the proposal is in the public interest as it will provide essential health and well-being services to residents of the Northern Beaches.

Having considered all relevant matters, it is concluded that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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APPENDIX A

ARCHITECTURAL PLANS

APPENDIX B

TRAFFIC AND PARKING REPORT

APPENDIX C

WASTE MANAGEMENT PLAN

