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24 September 2020

Lashta Haidari
Northern Beaches Council
725 Pittwater Rd
Dee Why NSW 2099

Dear Lashta,

STATEMENT OF ENVIRONMENTAL EFFECTS - 68-90 EVANS STREET, FRESHWATER (HARBORD DIGGERS SITE)

1. INTRODUCTION

This Statement of Environmental Effects (**SEE**) has been prepared by Urbis for Mt Pritchard and District Community Club (**the Mounties Group**) (**the Applicant**) to support a Development Application (**DA**) for a new bowling green at the Harbord Diggers Club at 68-90 Evans Street, Freshwater (**the site**).

The Mounties Group are seeking approval for the construction of a new bowling green on the upper ground level terrace. The previous development application for the site's redevelopment included an informal area as a bowling green however this application seeks to formalise this use. This is discussed further in Section 3.

This SEE is accompanied by the following documentation:

- Plans prepared by Tiger Turf – **Attachment A**;
- Plan of Management – **Attachment B**;
- Cost Summary Report – **Attachment C**;
- Waste Management Plan – **Attachment D**;
- Acoustic Assessment – **Attachment E**.

2. SITE AND SURROUNDS

2.1. THE SITE

The Harbord Diggers Club 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. It is bounded by Carrington Parade (north), McKillop Park and at grade car park

Harbord Diggers

(south), Lumsdaine Drive (east) and Evans Street (west). The site is outlined in red in the aerial context image in Figure 1 below.

2.2. SITE DESCRIPTION

The site is irregular in shape and is legally described as Lot 12 DP1197725. The site has a total area of approximately 15,696m² and currently accommodates the Harbord Diggers Club which comprises seniors living units and Club with associated gym, aquatic centre, child-care centre, community centre, function rooms and members hand car wash.

The seniors living units, known as 'Watermark', are located along the eastern portion of the site adjoining Carrington Parade. South-east facing apartments currently overlook the outdoor upper level terrace where it is proposed to construct the proposed bowling green.

Figure 1 Aerial view of site



Source: Six Maps

2.3. SURROUNDING DEVELOPMENT

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. Freshwater Village contains a mix of land uses and building types and characters that include:

- Medical/Healthcare – a family GP practice, physiotherapy, dentist, baby health care centre, and four pharmacies;

- Shopping and restaurants – IGA supermarket, fruit and vegetable market, bakeries, travel agents, cafés, general shopping facilities, butcher, hairdresser, Commonwealth Bank ATM, Westpac Bank ATM, Bendigo Bank and a range of restaurants and take-away food options;
- Recreational facilities – Freshwater Beach and reserve, and sporting ovals surrounding Freshwater Village; and
- Community facilities – post office, places of worship, parking station, public library, Harbord Hotel (pub).

3. BACKGROUND

3.1. PREVIOUS DEVELOPMENT CONSENTS

By way of background, the following development applications have been approved on site.

3.1.1. DA 2014/0875

On 1 December 2014, the former Sydney East Joint Regional Planning Panel (**JRPP**) granted development consent to DA 2014/0875 for the following works:

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

As outlined in the Statement of Environmental Effects (**SEE**) and Landscape Plans accompanying DA 2014/0875, the DA sought approval for a central bowling green on the upper ground floor terrace, accessible to the public via Evans Street or via the stairs from Lumsdaine Drive.

The upper ground floor terrace was proposed to include communal open space for residents, private patios for upper ground apartments, and bowling green facilities potentially accessible by the general public.

Whilst the SEE sought approval for a bowling green and the landscape drawings annotated a bowling green, Condition 4 of the consent (see extract below) did not make specific reference to the bowling green. Accordingly, this application seeks to formalise the use of the upper level terrace for the purposes of a bowling green for use by members of the Club and their guests only.

Condition 4:

'The Café, Aquatic Centre and Gymnasium are to be used only in conjunction with the operations of the Harbord Diggers Club.'

3.1.2. MOD 2015/0152

On 23 November 2015, Council granted development consent for modifications to DA 2014/0875. MOD 2015/0152 sought approval for modifications to the basement, reduction in the Club's gross floor area, increase in the Lumsdaine Drive landscaped outdoor area, additional ancillary land uses including a day spa and hairdresser, modifications to the childcare, amendments to the seniors living apartments, re-allocation of car spaces and removal of the green roofs.

This modification is not of relevance to the subject DA.

3.1.3. Current Status

The Club has completed the construction works as approved under the above Stage 2 approval, and as modified. The area originally demarked bowling green is currently being informally used by residential occupants.

3.2. PRE-LODGE MENT DISCUSSIONS

On 30 July 2020, a Pre-Lodgement Meeting was held with Council officers at Northern Beaches Council. The intent of the engagement was to inform Council of the proposed works and, where feasible, to address concerns by way of amendments. A summary of the Pre-Lodgement Meeting Minutes and Applicant Response is provided below in Table 1.

Table 1 Pre-Lodgement Meeting and Applicant Response

Council Comment	Applicant Response
<p>Background</p> <p>The site has been approved for Construction of Seniors Housing, Registered Club, Childcare Centre and associated car parking and landscaping (Harbord Diggers Club site) under Development Consent No. DA2014/0875.</p> <p>The Landscape Plans approved as part of the above Consent shows a central bowling green on the Upper Ground Floor, accessible to the public via Evans Street or via the stairs from Lumsdaine Drive.</p> <p>The Upper Ground Level terrace was approved as a communal open space for residents, private patios for upper ground apartments, and bowling green facilities potentially accessible by the general public.</p> <p>The applicant has indicated that whilst the Landscape Plans show a Bowling Green on the Upper Ground Floor, it was not formally acknowledged within the Consent or the applicant's Statement of Environmental Effects.</p> <p>Therefore, the DA seeks to formalise the bowling green on the upper ground level terrace and convert natural grass to synthetic grass.</p>	<p>Noted.</p>
<p>Operational Plan of Management</p>	<p>A Plan of Management Plan has been prepared by Mt Pritchard and District Community Club (the Mounties)</p>

Council Comment	Applicant Response
<p>Whilst the approved Landscape Plans indicate that a bowling green was approved, no details regarding the operation of this bowling green was provided.</p> <p>Accordingly, any DA for the formalisation of this bowling green is be accompanied by a detailed Plan of Management, particularly given the location of the bowling green in close proximity of seniors housing apartments.</p> <p>The PoM amongst other matters (i.e. acoustic number of patrons, hours of operation etc.), is also required to address the issue associated with overlooking of patrons using the bowling green on the residential units within the site.</p>	<p>Group) and submitted at Attachment B.</p> <p>The POM details the following:</p> <ul style="list-style-type: none"> ▪ The range of activities and operating times; ▪ Waste management; ▪ COVID 19 restrictions; ▪ Security; ▪ Noise management procedures and complaints handling. ▪ Privacy and impact on Watermark residents.
<p>Amenity</p> <p>Details regarding the impacts of the proposed bowling green on the amenity of existing residents with regards to noise, lighting, safety and privacy is to be provided within the application. It is recommended that residents of the site be informed of the proposed development prior to lodgement of the application with Council.</p>	<p>Refer to Section 6.2 and Plan of Management submitted at Attachment B. Refer to Acoustic Assessment at Attachment E.</p>
<p>Parking / Traffic</p> <p>A Traffic Report should be submitted with the application that details how Parking and Traffic relating to the proposed use will be accommodated within the site.</p>	<p>Refer to Section 6.2.3.</p>
<p>Permissibility</p> <p>Permitted with consent – under Schedule 1 of the WLEP 2011, which states that:</p> <p><i>13 Use of certain land at Lumsdaine Drive,</i></p> <p><i>Freshwater</i></p> <p><i>(1) This clause applies to land at Lumsdaine Drive,</i> <i>Freshwater, being Lot 100, DP 1136132 and Lot 2, DP</i></p>	<p>Refer to Section 5.2.1.</p>

Council Comment	Applicant Response
<p><i>579837, shown as “Area 13” on the Additional Permitted Uses Map.</i></p> <p><i>(2) 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></p> <p>The applicant is required to demonstrate that the use will only operate in in conjunction with the Registered Club.</p>	
<p>Heritage</p> <p>There are no heritage items affected by this proposal for a formal bowling green in the middle of the Harbord Diggers site development. The nearest heritage item is <i>Item I65 – Duke Kahanamoku Statue and Memorial Park, 77 Evans Street</i>, located approximately 120 metres from the proposed bowling green. The proposal is also approximately 120 metres from heritage conservation area <i>C14 Coastal Cliffs, South Curl Curl</i>.</p> <p>This proposal is for a change to an existing open space within an existing development and therefore there will be no impact upon the heritage significance of these nearby heritage items. Given the distance from the heritage items, there is no requirement for a Heritage Impact Statement – a mention of the heritage items in the SEE will be sufficient.</p>	<p>Refer to Section 5.4.2.</p>
<p>Management Plan</p> <p>These notes are in response to a pre-lodgement meeting held on 30 July 2020 to discuss the formalisation of a bowling green within the site.</p> <p>A Management Plan is required to be submitted with the future DA, outlining operational matters such as hours of use, estimated numbers of bowlers including members vs visitors, maintenance, and ancillary operations. Amenity Impacts on residents within the site are required to be addressed in the SEE.</p>	<p>A Plan of Management has been prepared and submitted at Attachment B.</p>



Council Comment	Applicant Response
Based upon the above comments you are advised to satisfactorily address the matters raised in these notes prior to lodging a development application.	

4. PROPOSED DEVELOPMENT

4.1. PROJECT VISION

Harbord Diggers is a club built by members for members. The proposal seeks to reintroduce the bowling green as a way to encourage exercise and socialising amongst existing and future members, contributing to their overall health and wellbeing.

When the bowling green is not in use for lawn bowls, it will be available for use by residents of Watermark, the adjoining seniors housing development, for social activities such as croquet, Tai Chi and picnics. The primary objectives of the proposal are to:

- Bring residents of Watermark and the surrounding community together;
- Encourage senior Club members to socialise and engage in physical activity;
- Provide a 'meeting point' for social interaction and community lifestyle;
- Provide opportunities for Club members and senior residents to participate in low-impact exercise; and
- Enhance the overall quality of life for Watermark residents and Club members.

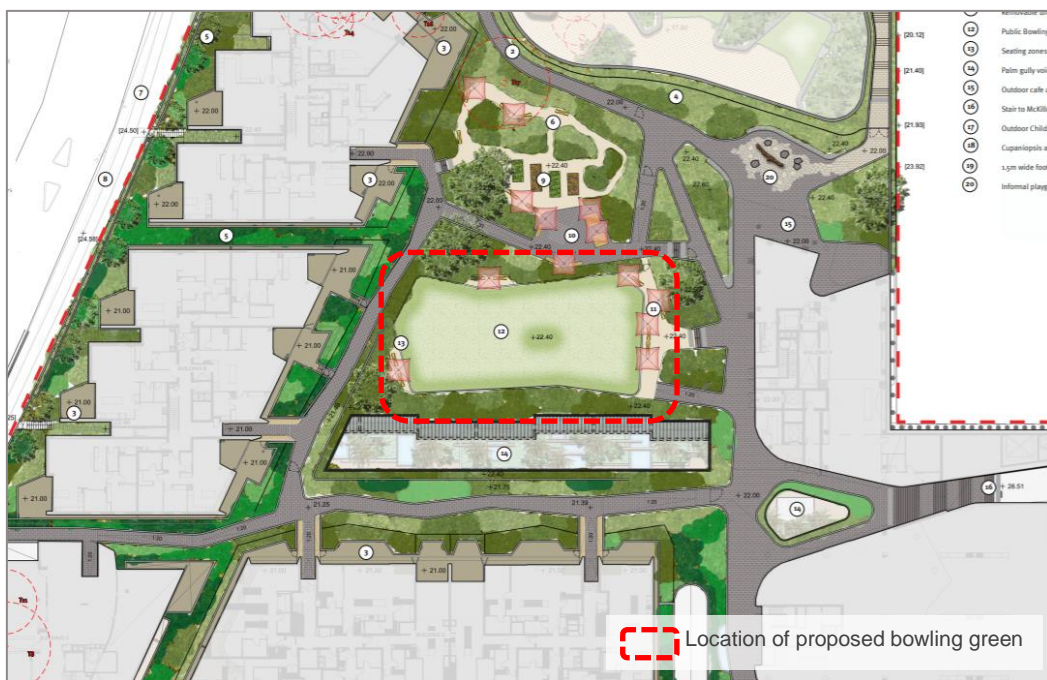
4.2. OVERVIEW

In summary, development approval is sought for the following:

- Construction of a new bowling green on the upper ground level terrace with three lanes (31m x 15.5m);
- Conversion of natural grass to synthetic grass;
- Reduction in playing level to minimise fill materials and accommodate existing level of entry paving stepping on to the green;
- Retention of existing drainage cell on slab;
- Construction of a ditch walls on all sides of proposed bowling green (to be constructed from concrete blocks and topped with bullnose paver for decorative but durable finish); and,
- Make-good landscaping works including reinstating garden upon completion of the bowling green.

An extract of the proposed bowling green location is provided in Figure 3 and Figure 4.

Figure 2 Approved landscape plan showing location of proposed bowling green



Source: Architectus + Chrofi

Figure 3 Proposed Bowling Green



Source: Tiger Turf

4.3. OPERATION

4.3.1. Operating hours

The proposed hours for the bowling green are:

- Monday to Sunday – 8:30am to 5:30pm

4.3.2. Proposed Activities

The bowling green will be a licensed area, consistent with the existing registered Club which holds a licence under the Liquor Act 2007. It will be available for use by members of the Club and their guests. Members will be able to book the bowling green.

Activities to be carried out on the bowling green include, however are not limited to:

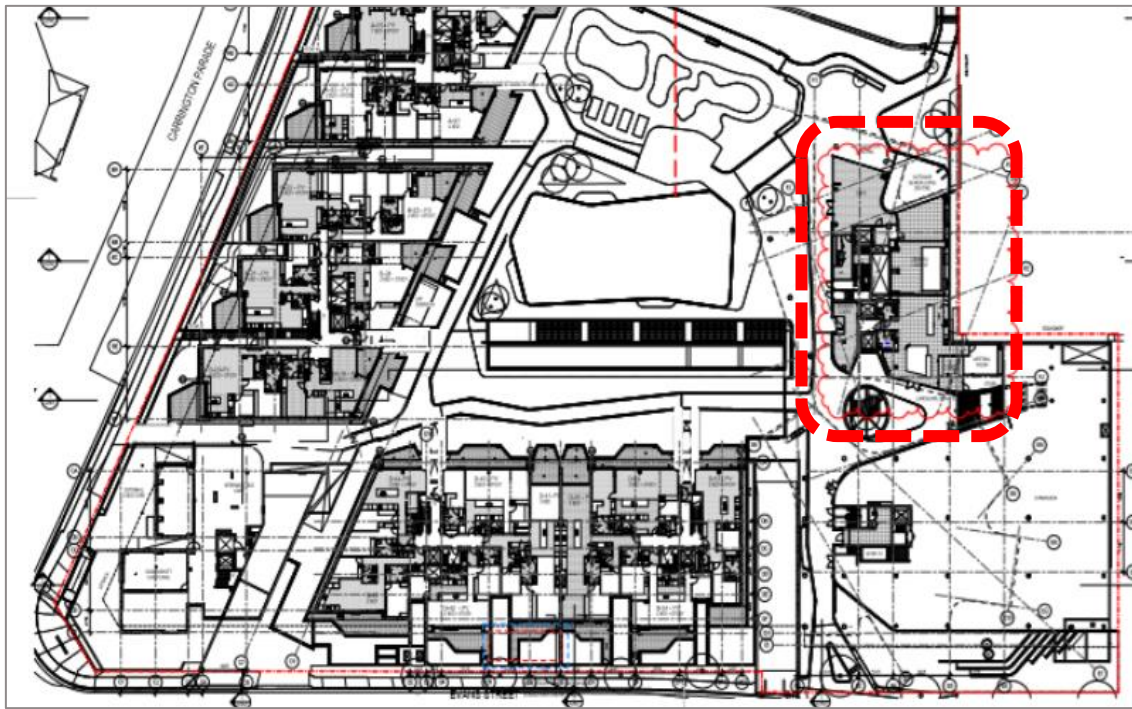
- Watermark croquet (use of wooden hoops and peg only) - Monday 9am to 11am and on weekends;
- Harbord Diggers Women's Lawn Bowls Sub Club - Tuesday & Thursday 9am to 3pm;
- Harbord Diggers Men's Lawn Bowls Sub Club - Wednesday & Saturday 1pm – 4pm;
- Watermark Tai Chi, Wednesday 8.30am to 10am;
- Men's & Women's Pennetts Lawn Bowl competitions – runs for three months of the year;
- Men's & Women's Lawn Bowls Interclub competitions – runs four times each season;
- Men's & Women's Lawn Bowls Friendship Day – runs four times each season;
- Men's & Women's Lawn Bowls social roll up and training to be conducted when rink is free of other activities;
- Harbord Diggers Yoga by the Sea- weekly;
- Gfitness exercise day -adhoc; and,
- Watermark monthly picnic.

4.3.3. Amenities

Members of the club and their guests will be able to use amenities including a bathroom and a locker room located to the east of the bowling green within the upper level (See Figure 4).

A water bubbler will be installed within the vicinity of the bowling green after the COVID19 pandemic subsides as per Bowls Australia guidelines.

Figure 4 Location of amenities



4.3.4. COVID 19 Restrictions

Due to the recent COVID 19 restrictions, the maximum number of players on the bowling green at one time during tournaments is eight per rink. The proposed bowling green comprises three rinks and therefore the maximum number of people on the bowling green at any one time will be 24.

When not in use, the bowling green can be used by residents of Watermark for picnics or exercise. Similarly, a maximum number of 50 people will be permitted on the green at any one time.

4.4. ACCESS AND PARKING

There are no changes proposed to the existing vehicular access arrangements to the site or car parking.

Members of the club and their guests will be able to utilise the existing club parking available on Basement Level 1 and 2. Vehicular access to the Club parking on Basement Level 1 and 2 is provided via the Evans Street Porte Cochere.

Two drop-off areas are also provided including one on the Lumsdaine Drive frontage, and one within the Evans Street Porte Cochere.

Pedestrian access to the Club is provided via all adjacent streets via a network of through site links. The bowling green will be accessible via Evans Street or via the stairs from Lumsdaine Drive. All members of guests will be required to sign in as per the current club entry requirements.

4.5. WASTE MANAGEMENT

The Club has a comprehensive internal and external waste management plan. As per existing operations, waste will be managed by the Club and contract cleaners. Multiple portable bins will be made available when required. Refer to Section 6.2.10 for further discussion.

4.6. BCA AND ACCESS

The detailed design of the proposed bowling green will be reviewed against the relevant sections of the Building Code of Australia (BCA). The proposal will also be reviewed by an Access Consultant with regard to the relevant Australian Standards and the BCA.

5. STATUTORY PLANNING ASSESSMENT

5.1. STATE ENVIRONMENTAL PLANNING POLICY

The following State Environmental Planning Policies are applicable to the proposed development:

- *State Environmental Planning Policy No 55—Remediation of Land (SEPP 55);*
- *State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP);*
- *State Environmental Planning Policy No 65—Design Quality of Residential Flat Development;*
- *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004;*
- Warringah Local Environmental *Plan 2011* (WLEP 2011); and
- Warringah Development Control Plan 2011 (WDCP 2011).

The following state environmental planning policies apply to the development however have no implications on the subject proposal.

5.2. STATE ENVIRONMENTAL PLANNING POLICY NO 55—REMEDIATION OF LAND (SEPP 55)

Previous Environmental Site Assessments have been undertaken for the site and confirmed the proposed development can be carried out on the land. The proposed bowling green will have no impact on the recommendations and conclusions provided within the reports previously considered by Council.

5.3. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007 (INFRASTRUCTURE SEPP) 2007

The existing development was previously referred to the RMS and Ausgrid under DA 2014/0875. The proposal does not seek to intensify the existing land uses or modify the existing parking provision. Accordingly, referral to the RMS is not considered necessary.

5.4. STATE ENVIRONMENTAL PLANNING POLICY NO 65—DESIGN QUALITY OF RESIDENTIAL FLAT DEVELOPMENT

A comprehensive assessment of the adjoining seniors housing residential development was undertaken as part of DA 2014/0875. This application is for the construction of a new bowling green only and does not impact on the ability of the adjoining development to comply with SEPP 65 and Apartment Design Guidelines.

5.5. STATE ENVIRONMENTAL PLANNING POLICY (HOUSING FOR SENIORS OR PEOPLE WITH A DISABILITY) 2004

A detailed assessment of the seniors housing component on the site against the provisions of the Seniors SEPP was submitted with DA 2014/0875. The proposal is for a new bowling green only and

does not alter the existing developments compliance with the key development standards contained within the Seniors SEPP.

5.6. WARRINGAH LOCAL ENVIRONMENTAL PLAN 2011

5.6.1. Zoning, Permissibility and Objectives

The site is zoned R2 Low Density Residential under the provisions of WLEP 2011. The objectives of the R2 zone are:

- *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 bowling green is defined as a Recreation Facility (outdoor):

Recreation Facility (outdoor):

*Means a building or place (other than a recreation area) used predominantly for outdoor recreation, whether or not operated for the purposes of gain, including a golf course, golf driving range, mini-golf centre, tennis court, paint-ball centre, **lawn bowling green**, outdoor swimming pool, equestrian centre, skate board ramp, go-kart track, rifle range, water-ski centre or any other building or place of a like character used for outdoor recreation (including any ancillary buildings), but does not include an entertainment facility or a recreation facility (major).*

Whilst *recreation facilities (outdoor)* are not technically permitted in the R2 Zone, under Schedule 1 of the WLEP 2011, *recreation facilities (outdoor)* are permitted with consent.

13 Use of certain land at Lumsdaine Drive, Freshwater

(1) This clause applies to land at Lumsdaine Drive, Freshwater, being Lot 100, DP 1136132 and Lot 2, DP 579837, shown as "Area 13" on the Additional Permitted Uses Map.

(2) 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.

The proposed bowling green will operate in conjunction with the existing Club. Only members of the Club and their guests will be able to use the bowling green. Accordingly, by virtue of Schedule 1, the proposed bowling green is permissible with consent.

5.6.2. LEP Provisions

The following table provides an assessment of the proposed development against the relevant clauses contained within the WLEP 2011.

Table 2 WLEP 2011 Provisions

Clause	Provision	Proposal	Complies
2.1 – Land Use Zones	R2 – Low Density Residential	<p>The proposal seeks approval for a bowling green which is defined as:</p> <ul style="list-style-type: none"> Recreation facility outdoor <p>As per Schedule 1 of WLEP 2011, recreation facilities (outdoor) are permissible with consent on the site if the use operates in conjunction with the registered Club. Only members of the Club and their guests will be able to use the bowling green.</p>	Yes
4.3 – Height of Buildings	8.5m	No increase in height.	As approved.
4.4 – Floor Space Ratio	Not specified.	No increase in gross floor area.	N/A
Clause 5.10 Heritage	Conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views, conserve archaeological sites and Aboriginal objects and Aboriginal places of heritage significance.	<p>The site is proximate to the following heritage items:</p> <ul style="list-style-type: none"> The Duke Kahanamoku Statue and Memorial Park, a local heritage item located within Mckillop Park to the east of the site; The Freshwater Rock Pool, a local heritage item located southeast of the site on the seashore; and The Coastal Cliffs, a heritage conservation area running between South Curl Curl to the north and Freshwater Beach to the south. <p>The proposed bowling green is located in the centre of the site and will not be readily visible from any of the above heritage items. The proposal will have</p>	Yes

Clause	Provision	Proposal	Complies
		no additional impacts on the heritage significance of the surrounding heritage items.	
6.4 – Development on sloping land	Avoid significant adverse impacts on development and on properties in the vicinity of development sites resulting from landslides originating either on or near sloping land.	The landslide risk associated with the site was assessed as part of DA 2014/0875. The proposed bowling green is unlikely to impact on existing subsurface flow conditions as the site is located on relatively impermeable rock mass.	Yes

5.7. WARRINGAH DEVELOPMENT CONTROL PLAN 2011

The relevant matters to be considered under Warringah Development Control Plan (**WDCP 2011**) are outlined below in the DCP summary compliance table. Given this application seeks approval for the construction of a bowling green only, many of the requirements of WDCP 2011 are not applicable to this development.

Table 3 WDCP 2011 Compliance Table

Provision	Control	Proposed	Complies
Part C Siting Factors			
C2 Traffic, Safety and Parking	Minimise traffic, vehicles queuing on public roads, the number of vehicle crossings in a street, traffic, pedestrian and cyclist conflict, interference with public transport facilities and the loss of “on street” kerbside parking.	There is no change to existing vehicular access arrangements to the site.	Yes

Provision	Control	Proposed	Complies
C3 Parking Facilities	<p>Provide adequate off street car parking. Off street parking is to be provided demonstrating that the following matters have been taken into account:</p> <ul style="list-style-type: none"> ▪ The land use; ▪ The hours of operation; ▪ The availability of public transport; ▪ The availability of alternative car parking; and ▪ The need for parking facilities for courier vehicles, delivery / service vehicles and bicycles. 	<p>A comprehensive parking assessment was undertaken as part of DA 2014/0875 and MOD 2015/0152. As per Condition 73, a total of 703 spaces are provided on site, with a total of 527 spaces dedicated to the Registered Club and associated facilities. The original DA intended for the upper level terrace to be used as a bowling green and therefore the total car parking provision is considered acceptable. Refer to Section 6.2.3 for further discussion.</p>	Yes
C4 Stormwater	<p>Manage and minimise stormwater overland flow, nuisance flooding and groundwater related damage to properties.</p>	<p>A Stormwater Management Plan was approved with the DA 2014/0875. The Plan is still applicable to the development and bowling green.</p>	Yes
C8 Demolition and Construction	<p>All development that is, or includes, demolition and/or construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must be accompanied by a Waste Management Plan.</p>	<p>Refer to Section 6.2.10 and Waste Management Plan submitted at Attachment D.</p>	Yes
C9 Waste Management	<p>All development that is, or includes, demolition and/or construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must</p>	<p>Refer to Section 6.2.10 and Waste Management Plan submitted at Attachment D.</p>	Yes

Provision	Control	Proposed	Complies
	be accompanied by a Waste Management Plan.		
Part D - Design			
D1 Landscaped Open Space and Bushland Setting	Minimum landscaped area – 40%	DA 2014/0875 proposed 32% of the site to be used for landscaped open space, increasing to 60% including the proposed green roofs. The proposal seeks to replace the existing natural turf with synthetic turf and reinstate the gardens surrounding the bowling green. No other changes to the approved landscaping scheme are proposed.	Yes As approved
D3 Noise	To ensure that noise emission does not unreasonably diminish the amenity of the area or result in noise intrusion which would be unreasonable for occupants, users or visitors.	See Section 6.2.5 and Acoustic Assessment at Attachment E . Noise impacts are expected to be minimal as all activities conducted on the green are low volume activities. Furthermore, the bowling green will only be operational during daylight hours, that is 8.30am to 5.30pm. No late night use is proposed. In the event of a noise complaint, a complaint register has been set up and club management are onsite to address any noise complaints.	Yes
D7 Views	Provide for the reasonable sharing of views.	The proposed bowling green is located in the centre of the site. It is not proposed to install any permanent structures that would affect views available from key public places or residential apartments.	Yes

Provision	Control	Proposed	Complies
D8 Privacy	Ensure the siting and design of buildings provides a high level of visual and acoustic privacy for occupants and neighbours, encourage innovative design solutions to improve the urban environment and provide personal and property security for occupants and visitors.	See Section 6.2.4. The proposed bowling green is separated from the Watermark residents by a pedestrian pathway and landscaped planter box. If the residents raise concerns with the privacy or a formal complaint is made, the Club will offer planting, screening, or landscaping to address any concerns that they may have.	Yes
D14 Site Facilities	Provide for the logical placement of facilities on site that will result in minimal impacts for all users, particularly residents, and surrounding neighbours.	Adequate bathroom and locker facilities are provided in convenient locations at the upper level of the club.	Yes
D18 Accessibility	Development is to comply with Australian Standard AS1428.2.	The detailed design of the bowling green will be reviewed by a certified Access and BCA Consultant to ensure the bowling green complies with Australian Standard AS1428.2.	Yes
D20 Safety and Security	Ensure that development maintains and enhances the security and safety of the community.	Refer to Section 6.2.7. Throughout the day, routine checks will be carried out by Harbord Diggers Customer Service Manager and Watermark Reception staff. Harbord Diggers Customer Service Management will conduct a morning and late afternoon check. Watermark Reception staff will complete a lunch and afternoon check. A Harbord Diggers security guard will carry out a perimeter check each morning before 9.30am.	Yes

Provision	Control	Proposed	Complies
		Security will also conduct regular perimeter checks between the hours of 6pm to 2am, 7 days a week. From 2am onwards, security guards will monitor the bowling green 24-7 via live stream CCTV cameras.	

6. SECTION 4.15 ASSESSMENT

6.1. STATUTORY POLICY AND COMPLIANCE – SECTION 4.15 (1)(A)

The following assessment has been structured in accordance with Section 4.15(1)(a) of the Environmental Planning & Assessment Act 1979 (EP&A Act). The proposed development has been assessed in accordance with the relevant state, regional and local planning policies, as follows:

- *State Environmental Planning Policy No 55—Remediation of Land (SEPP 55);*
- *State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP);*
- *State Environmental Planning Policy No 65—Design Quality of Residential Flat Development;*
- *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004;*
- *Warringah Local Environmental Plan 2011 (WLEP 2011); and*
- *Warringah Development Control Plan 2011 (WDGP 2011).*

6.2. LIKELY IMPACTS OF THE DEVELOPMENT – SECTION 4.15(1)(B)

6.2.1. Landscaping and Communal Open Space

An extract of the landscape plan approved under MOD 2015/0152 is provided below in

Figure 5. As illustrated, the landscape plan identifies a bowling green in the centre of the upper ground floor and comprises predominantly turf. It is proposed to replace the natural turf with synthetic turf. Given this area was always earmarked for a bowling green, there will be no loss of communal open space for Watermark residents. When the bowling green is not in use, residents will be able to utilise the green for passive recreation and socialising.

Figure 5 Approved Landscape Plan



Source: Architectus + Chrofi

6.2.2. Access, Parking and Traffic

A Traffic Impact Assessment (TIA) prepared by GTA Consultants was submitted with DA 2014/0875 to consider the adequacy of car parking provision, the proposal's impact on the local traffic network, the parking area's compliance with relevant access and circulation standards, and the provision of servicing areas within the development.

As discussed in Section 3, the original DA proposed a bowling green on the upper level terrace however details of the layout and operation were not provided. As this use was always intended to operate in conjunction with the existing club, it is considered appropriate to rely on the assessment of the original development. This DA merely seeks to formalise the use of this space for a bowling green.

As per the original TIA, the traffic generation estimates of the proposed development indicated that it would generate approximately 322 vehicle trips in the AM peak hour and 482 vehicle movements in the PM peak hour.

GTA Consultants modelled the impact of the increased traffic generation on various intersections surrounding the site and confirmed that all intersections would retain their current operating conditions with the Level of Service B, or better during the morning and afternoon peak periods.

A comprehensive parking assessment was undertaken as part of DA 2014/0875 and MOD 2015/0152. As per Condition 73, a total of 703 spaces are provided on site, with a total of 527 spaces dedicated to the Registered Club and associated facilities. As discussed above, the original DA intended for the upper level terrace to be used as a bowling green and therefore the total car parking provision is considered acceptable.

The bowling green will be used at various times of the day and therefore the patterns of car parking associated with the uses will create peak demands at different times during the day and week. The original TIA anticipated a maximum peak demand of 703 spaces between 6.00pm and 10.00pm on Friday nights. The bowling green will only operate Monday to Sunday between 8.30am and 5.30pm, outside these peak hours.

Furthermore, the bowling green will be available for use by members and their guests only. It is anticipated that the majority of people using the bowling green will either be residents who reside in the adjoining Watermark apartments or are undertaking multi-modal trips, that is using the bowling green, club and other facilities on site. The site also has direct access to public transport, providing access to local retail precincts including Warringah mall, Dee Why and Brookvale.

Accordingly, the proposed traffic, parking and access arrangements are considered to be appropriate and will not create any additional adverse impacts to the surrounding area.

6.2.3. Visual Amenity

The proposed bowling green is located on the upper level terrace in the centre of the site situated between the Club and seniors living apartments known as 'Watermark.' As evident on the approved landscape plan (see Figure 3), the bowling green is separated from the Watermark residents by a pedestrian pathway and landscaped planter box.

Consultation with the residents is proposed to assist in alleviating any concerns in relation to privacy. If the residents raise concerns with the privacy or a formal complaint is made, the Club will offer planting, screening, or landscaping to address any concerns that they may have.

6.2.4. Acoustics

An Acoustic Assessment has been undertaken by Acoustic Logic and submitted at **Attachment E**. The report concludes the following:

- With regard to residents outside the development (along Carrington Parade or Evans Street), there is no expected to be any additional source of noise generated by the use of the greens. The building form of the Harbord Diggers site would provide significant noise shielding to these locations.
- With regard to Watermark residents there is expected to be minimal impact for the following reasons:
 - Use of the greens will generally be of low noise intensity. Competition events are generally conducted with little noise in the interests of the competing players.
 - High noise intensive uses such as barefoot bowls are not proposed to be undertaken.
 - Operational hours for the greens are limited to the daytime and early evening period where there is lower sensitivity to potential noise impacts. More specifically, it would be expected that use of the area would only be during daylight hours, given the area is not provided with artificial light.
 - Any noise associated with maintenance of the greens is minimised with the synthetic turf proposed.
 - The area is currently used as a common open space and so there would not be any significant change in the acoustic amenity provided to existing residents.

Notwithstanding the above, the following management strategies may be implemented to minimise any potential noise to sensitive receivers:

- Use of the bowling greens should be limited to activities nominated in the Plan of Management. Functions or other social gathering activities should not be undertaken on the greens or surrounding podium areas unless approved by Club management.
- Members of the Club should be informed of their residential surroundings and to be mindful of any noise which may be generated. A code of conduct or condition for membership of the Club should include a Clause relating to noise generated by members. In the event that members are identified to be generating excessive noise, membership should be restricted.
- Use of the greens should not occur during the night-time period.

In the event of a noise complaint, a complaint register has been set up and club management are onsite to address any noise complaints.

6.2.5. Operations and Security

The operation and management of the bowling green has been considered as part of this DA. A Plan of Management has been prepared by Harbord Diggers Mounties Group and submitted at **Attachment B**. The Plan details the following:

- The range of activities and operating times;
- Waste management;

- COVID 19 restrictions;
- Security;
- Noise management procedures and complaints handling.
- Privacy and impact on Watermark residents.

Covid 19

Due to the recent COVID19 restrictions, the maximum number of players on the bowling green at any one time during tournaments is 8 per lane. The proposed bowling green provides three rinks and therefore a maximum of 24 people will be permitted on the green.

When the bowling green is being used for exercise or picnics by Watermark residents, the maximum number of people permitted on the green will be 24 (during COVID) and 50 (post COVID).

Comprehensive hygiene procedures will be implemented to maintain the health and safety of all staff and club patrons. Further details are provided in the POM submitted at **Attachment B**.

Security

Throughout the day, four routine checks will be carried out by Harbord Diggers Customer Service Manager and Watermark Reception staff to ensure non permitted patrons are not accessing the green. Harbord Diggers Customer Service Management will conduct a morning and late afternoon check at approximately 11am and 4pm. Watermark Reception staff will complete a lunch and afternoon check at approximately 12.30pm and 2pm.

A Harbord Diggers security guard will carry out a perimeter check each morning before 9.30am. Security will also conduct regular perimeter checks in their patrol of Harbord Diggers club between the hours of 6pm to 2am, 7 days a week. From 2am onwards, security guards will monitor the bowling green 24-7 via live stream CCTV cameras.

6.2.6. BCA and Accessibility

The bowling green will be designed to comply with all relevant accessibility standards and policies. All building works will be carried out in accordance with the requirements of the Building Code of Australia.

6.2.7. Consultation

The plan for consulting with residents is to send a letter to residents in early October to advise a DA for the proposed bowling green has been lodged. The Applicant will then follow up with the residents committee for feedback and concerns.

6.2.8. Waste Management

A Waste Management Plan has been prepared and submitted at **Attachment D**. The existing Club has a comprehensive internal and external waste management plan. Waste will be managed by the Club and contract cleaners. Multiple portable bins will be made available as required.

As per the Waste Management Plan approved under DA 2014/0875, all waste management on the bowling green will be coordinated by the Club and will be collected by commercial contractors. Waste will be managed at the existing back-of-house area (BOH) on Basement 3. The BOH area is accessed via three lift cores from the Club level.

The waste storage areas have been designed to comply with Council's requirements. Waste will be transferred from Basement Level 3 to the loading dock for collection.

6.3. SUITABILITY OF THE SITE FOR THE DEVELOPMENT – SECTION 4.15 (1)(C)

The site is suitable for the development for the following reasons:

- The proposed land use is permissible on the site;
- The existing Club is an established community land use within the area;
- The proposed bowling green will be a better use of underutilised outdoor space within the site;
- The proposed bowling green is complementary to the existing Club and associated facilities; and,
- The area was always intended to be utilised for the purposes of an outdoor bowling green.

6.4. THE PUBLIC INTEREST - SECTION 4.15 (1)(E)

The proposed bowling green is in the public interest because it will provide a number of benefits for Watermark residents, members of the Club and their guests including improved fitness and mental wellbeing, opportunities to socialise and connect with the community.

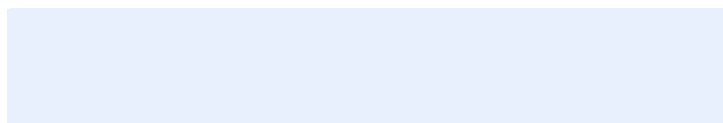
7. CONCLUSION

The proposed development has been assessed against Council's applicable planning policies. The reasons why a positive assessment and determination of the proposed development should prevail are summarised below:

- The proposal is consistent with State and subregional strategic planning objectives;
- The proposed bowling green is consistent with the zoning objectives and is a historical land use on the site;
- The bowling green is a permissible land use in accordance with Schedule 1 of WLEP 2011;
- The proposed bowling green is considered to have negligible environmental impacts with regards to noise, traffic and visual privacy. Consultation will continue to occur with residents of Watermark to ensure any resident concerns are resolved;
- Any potential amenity impacts on adjoining residents can be mitigated by additional planting, screening, or landscaping; and,
- The proposed use is complementary to the existing Club and will improve the overall wellbeing of residents, Club members and their guests.

In view of the above, we conclude that the proposed bowling green will provide a significantly positive impact and should be approved.

Yours sincerely,



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