



HARBORD DIGGERS: HEALTH CONSULTING ROOMS

Statement of Environmental Effects

Prepared for
MOUNTIES GROUP
10 September 2020



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1. INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared on behalf of the applicant, Mount Pritchard and District Community Club Ltd (Mounties Group) in support of a DA for the change of use of an existing club space to a health care facility at 88 Evans Street, Freshwater ('Harbord Diggers Club').

The proposed health care facility, known as Mounties Care, will be located within the existing club envelope along the Porte Cochere to the south of the club precinct. The health care facility will consist of a clinic style practice, containing three health consulting rooms. A variety of specialists performing non-surgical medical procedures and General Practitioners performing non-surgical and minor surgical procedures will use the space. The proposed health care facility will be 75m² in size.

The proposed health care facility will provide medical services and varied allied health services such as dietary services and mental health services, home healthcare services, preventative healthcare programs, lifestyle programs, wellbeing programs and health education.

Development consent is sought in accordance with Part 4 of the EP&A Act.

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 – Statutory Context:** provides a detailed assessment of the State and local environmental planning instruments and plans relevant to the site and development.
- **Section 6 – Assessment of Key Issues:** identifies the potential impacts arising from the proposal and recommends measures to mitigate, minimise or manage these impacts.
- **Section 7 – 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 8 – 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 Documentation

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

2. SITE CONTEXT

2.1. SITE DESCRIPTION

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. It 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 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.

The key features of the site are summarised in the following table.

Table 2 – Site Description

Feature	Description
Street Address	88 Evans Street, Freshwater (also referred to as 68-90 Evans Street Freshwater)
Legal Description	Lot 20 in Deposited Plan 1242304
Site Area	Approx. 1.58 hectares



Figure 1 – Aerial Photograph
(Source: SixMaps)

3. PROJECT HISTORY

The Harbord Diggers Club has been subject to multiple Development Applications over many years 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).

The construction works in accordance with the approvals are generally completed across the site and Interim Occupation Certificates issued.

DA2020/0101 – Strata Subdivision Development Approval

Approval was granted by Northern Beaches Council in March 2020 for the subdivision of the Harbord Diggers development site into three stratum allotments. The lots were subdivided as follows:

- **Seniors Living Allotment (Stratum Lot 1):** Comprising all seniors living components for the site including recreational landscaped areas exclusive for village use;
- **Club/Other Uses Allotment (Stratum Lot 2):** Comprising the licensed club, ancillary club uses and all common areas of the Development. The club/other uses stratum will retain air rights across the entirety of the site; and
- **Parking Allotment (Stratum Lot 3):** Comprising the basement levels of car parking excluding specific plant rooms or facilities which exclusively support other stratum.

4. PROPOSED DEVELOPMENT

4.1. OVERVIEW

The proposal comprises the change of use of an existing area, 75sqm in size, within the Harbord Diggers Club to a health services facility, known as Mounties Care. Mounties Care will be a service for members of the Harbord Diggers Club. The internal fit-out will generally comprise three consulting rooms but will be subject to a complying development certificate following an approved development application.

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 with the applicable space labelled MS6.

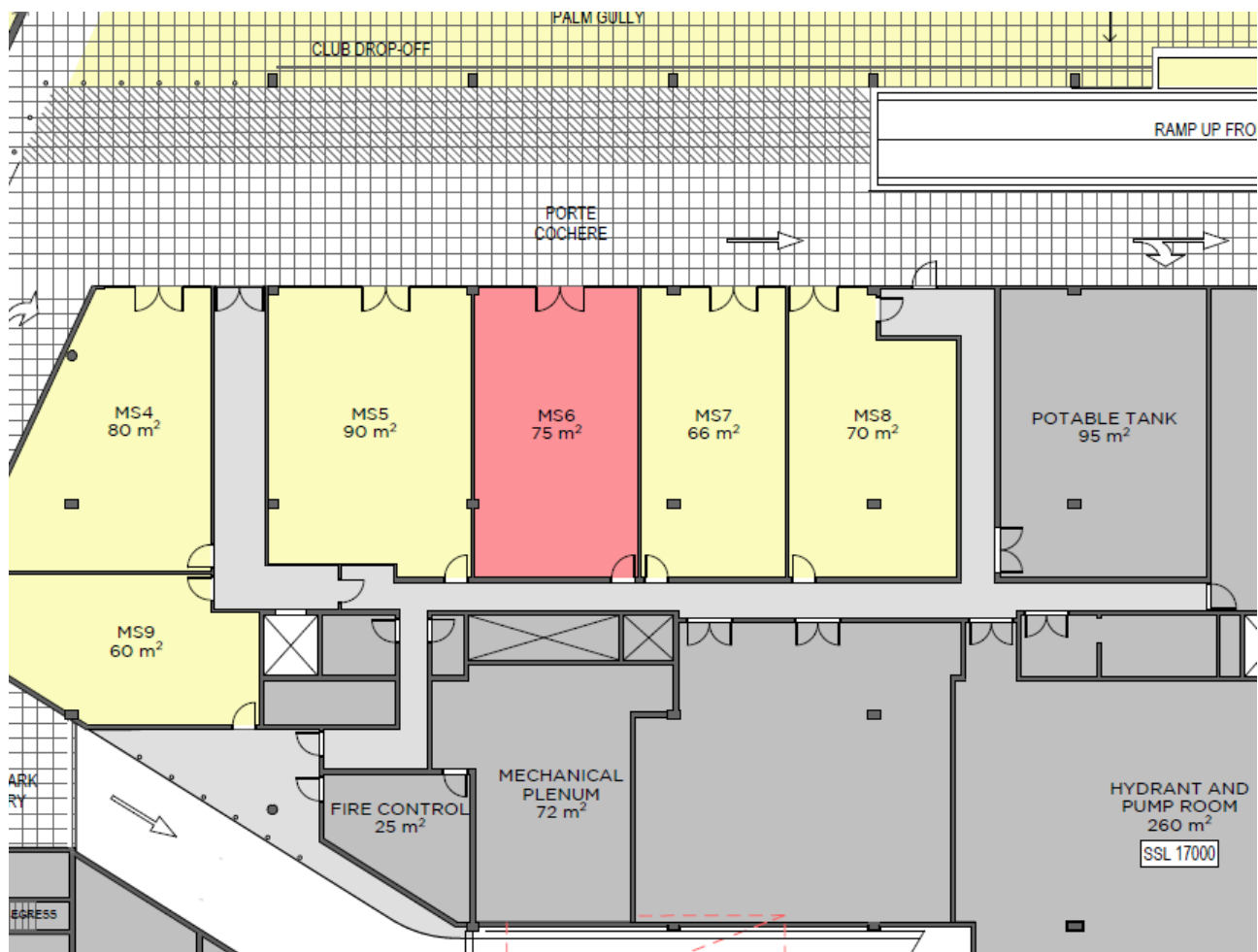


Figure 2 – Site plan (Source: CHROFI)

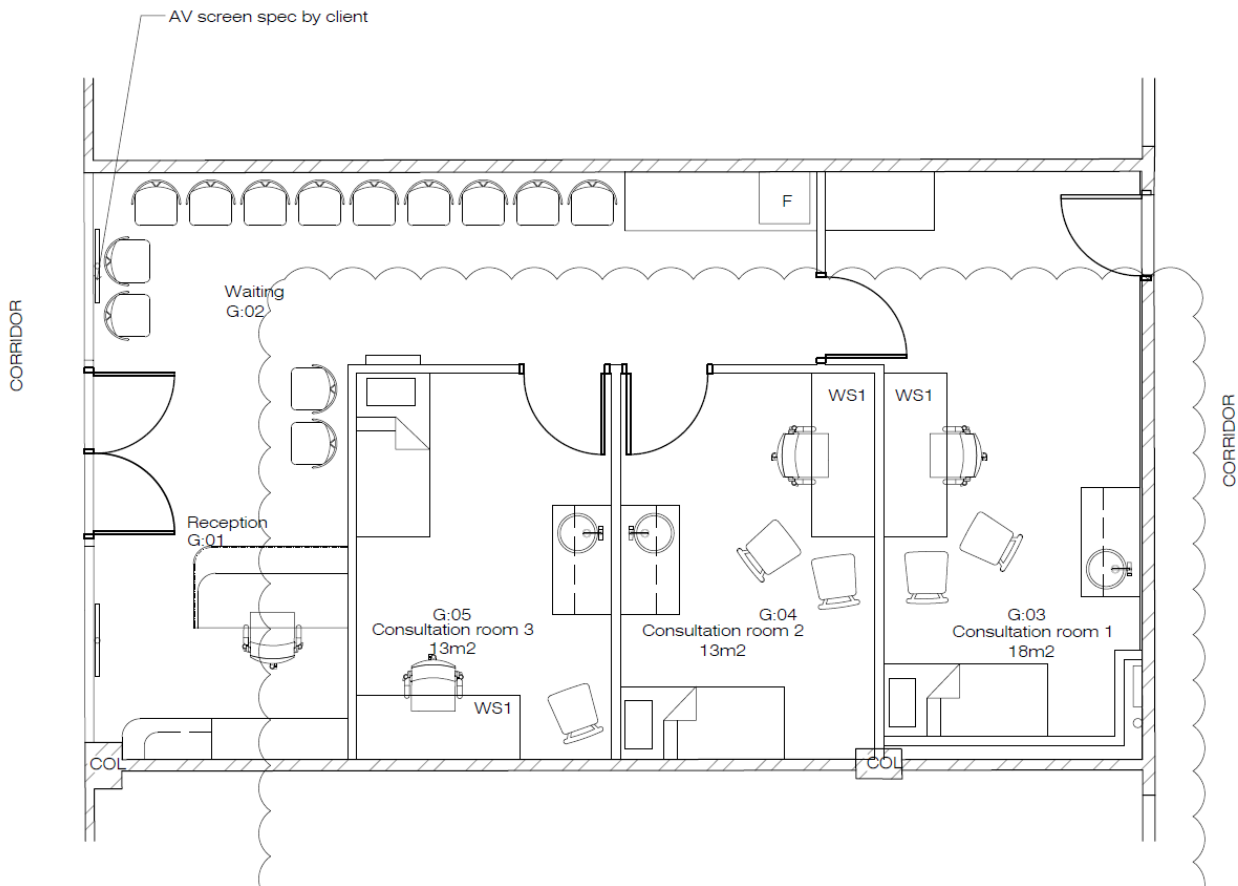


Figure 3 – Indicative Internal Layout Plan (Source: CHROFI)

Northern Beaches LGA shows 55% of the population are 65 years or older and findings in the Northern Beaches Population Forecast show the largest increase in persons between 2016 and 2026 is forecast to be in ages 75 to 79. Additional accessible health care facilities are essential for this ageing population.

The applicant is seeking to provide additional services to meet the health and wellbeing needs of the members of the Harbord Diggers Club. The health services facility will provide medical services, varied allied health services including dietary services and mental health services, preventative healthcare programs, lifestyle programs, wellbeing programs and health education. These services will be provided by general practitioners, allied health professionals, healthcare specialists, support workers and nurses.

4.2. INTERNAL FIT OUT

The internal fit-out will be subject to a complying development certificate once the development application has been approved.

4.3. PARKING AND ACCESS

A Traffic and Parking report has been prepared by Arup (refer to **Appendix B**). The proposal does not seek to modify vehicle access or increase the number of parking spaces for the proposed health services facility. The traffic and parking report examined the ability of the existing car park to adequately provide parking for members.

4.4. OPERATIONAL DETAILS

4.4.1. Proposed Services

The proposed services provided at the health facility include:

- Medical Services
- Exercise Physiology, physiotherapy and dietetics
- Podiatry
- Aged Care Services
- Pathology
- Massage Therapy
- Mental Health services
- Other health aligned services.

4.4.2. Hours of Operation

The proposed Mounties Care will operate seven days per week. The proposed hours of operation are:

- 7am – 7pm Monday to Friday
- 8am – 3pm Saturday
- 9am – 12pm Sunday.

4.4.3. Employees

Initially, there will be a maximum of two general practitioners using the health care facility. If required, the club will make unoccupied rooms available to other health and wellbeing consultants or allied health professionals such as massage therapists, physiologists or nutritional consultants.

4.4.4. Waste Management

A Waste Management Plan 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. Any adaptive reuse will be considered and actioned whenever possible.

Occupation waste

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

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.

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.

5. STATUTORY CONTEXT

5.1. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP) aims to facilitate the effective delivery of key infrastructure across the state. Division 10 provides provisions for the development of health services facilities.

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 3 – Compliance with Infrastructure SEPP

Clause	Provision	Proposed	Complies
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

5.2. 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 development is defined as a health services facility in accordance with the WLEP. Health services facilities are not permitted with development consent in the R2 low density residential zone. However by virtue of Clause 57, the proposed use is permissible with consent. The following table assesses the compliance of the proposed development with other relevant clauses in the LEP.

Table 4 – WLEP Compliance Table

Clause	Provision	Proposed	Complies
Clause 2.5 – Additional Permitted Uses for particular land	The site is subject to <i>Schedule 1- Additional Permitted Uses</i> which specifically permits, “ <i>Development for the purposes of recreation facilities (indoor), recreation facilities (outdoor) (but only if the</i>	The proposal is for a health services facility within Harbord Diggers Club.	N/A

Clause	Provision	Proposed	Complies
	<i>facility, whether indoor or outdoor, operates in conjunction with a registered club) and registered clubs is permitted with consent</i>		
Clause 4.1 – Minimum Subdivision Lot Size	The minimum lot size is 450sqm.	The proposal does not seek to subdivide the existing lot.	Yes
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

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

5.3. WARRINGAH DEVELOPMENT CONTROL PLAN

Warringah Development Control Plan 2011 (the 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, many provisions do not apply to the site.

Table 5 – WDCP Compliance Table

Clause	Provision	Proposed	Complies
C9 Waste Management	All relevant Development Applications must be accompanied by a Waste Management Plan.	The development application is accompanied by a Waste Management Plan (refer to Appendix C).	Yes
Appendix 1 Car Parking Requirements The provisions for both health consulting rooms and medical centres were examined.	<u>Health consulting room:</u> 3 spaces per room used to see patients (This may be reduced if not all rooms will be in concurrent operation). <u>Medical Centre:</u> 4 spaces per 100 m2 GFA.	The health care facility features 3 consulting rooms. This provision requires 9 additional car spaces. The health care facility will have an area of less than 100sqm, therefore	The Traffic and Parking report prepared by Arup (refer to Appendix B), found that during the peak hours of the club there was sufficient capacity with the average occupancy at around 50-70% even in busy periods. Therefore, the existing car park can

Clause	Provision	Proposed	Complies
		4 spaces will be required.	<p>adequately accommodate any additional traffic generated by the proposed health consulting room. It is further noted that the use of the facility will be provided for Club members and as such not generate additional traffic or parking.</p> <p>The ARUP report concludes relevant to car parking:</p> <p><i>“No change to the number of parking spaces in the club carpark is planned for the proposal. This is deemed acceptable as there are approximately 180 parking spaces (of the public car parking area) being almost always available for patrons of the health facility, the proposed health service facility is likely to have minimal effect”.</i></p>

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

6. ASSESSMENT OF KEY ISSUES

This section provides an assessment of what is determined to be the key planning issues relevant to the proposed development.

6.1. TRANSPORT, TRAFFIC AND PARKING

A Traffic and Parking report has been prepared by Arup (refer to **Appendix B**). The proposal does not seek to modify vehicle access or increase the number of parking spaces for the proposed health services facility. Part H, Appendix 1 of the Warringah Development Control Plan 2011 provides a car parking for health consulting rooms at three spaces per room. Therefore, nine (9) spaces are required for the health services facility.

The traffic and parking report examined 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 (including Badge draws) at around 50-70% (or minimum 180 spaces). The club generally holds major events in the evening which will be outside the trade hours of the Health Consulting rooms and as such ensure there remains capacity in the car park.

The ARUP report provided the following conclusions:

- *“The GTA parking assessment in 2014 was conservative when forecasting the peak parking demand for various land uses. The forecast maximum parking occupancy for all combined public uses (i.e. club and recreation) was at the time found to be approximately 524 spaces (excluding Seniors Living component).*
- *Recent surveys undertaken of the Harbord Diggers Club carpark has revealed sufficient capacity with occupancies at around 50-70% (or a minimum of 180 available spaces), even during busy periods such as Badge draws.*
- *Therefore, the proposal does not seek to increase the number of parking spaces. The assessment of recent data shows that there is enough capacity for the Harbord Diggers Club to implement the proposed health facility without making any changes to the current car park.*

It is therefore concluded that the proposal is supportable on traffic planning grounds and will operate satisfactorily”.

The location chosen for Mounties Care provides the ideal opportunity for members accessing healthcare to be dropped off at the door either by taxi, uber or the Club's courtesy bus. The Courtesy bus operates from 11am to late daily whereby members living within a 5km radius of the club are offered a door to door service.

Therefore, it is concluded that the existing car park has capacity to accommodate the 9 car spaces required for the health services facility.

6.2. WASTE MINIMISATION AND MANAGEMENT

The Waste Management Plan provided at **Appendix C** details the construction and operation waste management. Active site management during the construction phase between the Harbord Diggers Facility Management Team and appointed builder will ensure all waste/recyclable materials are disposed of appropriately and that all waste receptacles are of sufficient capacity to manage onsite activities. Any adaptive reuse will be considered and actioned whenever possible.

A Waste Management Committee will be appointed and include a medical consultatory firm engaged to manage the Health Consulting Rooms. The Committee will create a Waste Management Plan that 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.

Clinical and pharmaceutical waste will be disposed in accordance with the NSW Health guidelines outlined in the Clinical and Related Waste Management for Health Services (PD2017_026).

Therefore, construction and operational waste will be appropriately minimised and managed.

7. SECTION 4.15 ASSESSMENT

The proposed development has been assessed in accordance with the relevant matters for consideration listed in Section 4.15 of the EP&A Act 1979.

7.1. ENVIRONMENTAL PLANNING INSTRUMENTS

The proposed development has been assessed in accordance with the relevant State and local environmental planning instruments in **Section 5**.

Pursuant to Clause 57 of the Infrastructure SEPP, development for the purpose of health services facilities may be carried out by any person with consent on land in a prescribed zone. The site is located in a R2 Low Density Residential zone and is a prescribed zone.

Although health services facilities are not permitted with development consent in the R2 low density residential zone, the Infrastructure SEPP is the presiding environmental planning instrument. This development application is therefore seeking consent for the change of use to a health service facility pursuant to Clause 57 of the Infrastructure SEPP.

7.2. DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No draft environmental planning instruments are relevant to this proposal.

7.3. DEVELOPMENT CONTROL PLAN

Warringah Development Control Plan 2011 (WDCP) provides detailed planning controls relevant to the site and the proposal. An assessment against the relevant controls is provided in **Section 5.3**. The assessment concludes the proposal complies with the relevant provisions within the DCP.

7.4. PLANNING AGREEMENT

No planning agreements are relevant to this proposal.

7.5. REGULATIONS

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

7.6. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** There are no anticipated impacts to the natural environment. This development application is for the proposed change of use of an existing space with the registered club to a health care facility.
- **Built Environment:** There are no proposed works as part of the application as the fit out works are subject to a future CDC. The additional car parking at the site will be absorbed in the local traffic network.
- **Social:** The proposal will provide key health care services to an ageing population in the Northern beaches. These wellbeing and lifestyle programs aim to improve the quality of life of the existing Club members.
- **Economic:** The proposal will result in a small generation of business activity at the health facility, however will predominately be complementary to the Club offering and provide an additional service for existing members.

7.7. 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. The R2 zone is identified as a prescribed zone, pursuant to Clause 57 of the Infrastructure SEPP. The objectives of the R2 zone are to 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 care needs of the Harbord Diggers members.
- Northern Beaches LGA shows 55% of the population are 65 years or older and key findings published in the Northern Beaches Population Forecast show the largest increase in persons between 2016 and 2026 is forecast to be in ages 75 to 79, which is expected to increase by 3,005 and account for 3.8% of the total persons. Additional accessible health care facilities are essential for this ageing population.
- The proposed health care facility will provide a range of essential health care and well being services to residents of the Northern Beaches.
- 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 care facility.

7.8. SUBMISSIONS

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

7.9. 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 will provide additional health care in an LGA with an ageing population.

8. CONCLUSION

The proposed 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 the locality:

- **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.
- **The proposal will result in positive social and economic impacts:** the proposal will provide key health care 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 highly suitable for the site:** the proposal is identified as a prescribed zone in the Infrastructure SEPP, permitting the use of a health services facility at the site. 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 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, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

ARCHITECTURAL DRAWINGS

APPENDIX B

TRAFFIC AND PARKING REPORT

APPENDIX C

WASTE MANAGEMENT PLAN

