



Statement of Environmental Effects







**Fire Water Storage Tank and
Fixed-on-Site Pump Set**

27-47 Birkley Road, Manly

Submitted to Northern Beaches Council
On Behalf of Uniting

NOVEMBER 2019

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Disclaimer

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APPENDICES

Appendix	Document	Prepared by
1	Survey Plans	LTS
2	Planning Certificate	Northern Beaches Council
3	Engineering Plans	JHA Engineers
4	Pre-Lodgement Meeting Notes	Northern Beaches Council
5	Parking Impact Statement	TRAFFIX
6	BCA Statement	Blackett Maguire + Goldsmith
7	Waste Management Plan	Applicant

1. EXECUTIVE SUMMARY

This Statement of Environmental Effects (SEE) has been prepared by City Plan Strategy & Development (City Plan) on behalf of Uniting to accompany a Development Application (DA) to Northern Beaches Council (Council). The SEE relates to land at 27-47 Birkley Road, Manly (the site) known as Uniting Wesley Heights Manly.

This SEE has been prepared pursuant to Section 4.12 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and Clause 50 of the Environmental Planning and Assessment Regulation 2000 (EP&A Reg). The purpose of this SEE is to:

- describe the proposed development and its context;
- assess the proposal against the applicable planning controls and guidelines; and
- assess the potential environmental impacts and mitigation measures.

The proposed development comprises the installation of a water storage tank and fixed-on-site pump sets. A review of Part 8 Fire Safety Code of State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP) has confirmed that these works do not comprise complying development. Therefore, a local DA is required to be submitted to Council for assessment and determination.

The proposed development is permitted with consent in the R1 General Residential zone under the Manly Local Environmental Plan 2013 (MLEP 2013) as development that is ancillary to an existing seniors housing development. The proposed development comprises internal works only within an existing basement level and therefore it will not increase the building height or floor space ratio (FSR) for the site as approved and constructed.

A pre-lodgement meeting was held with Council on 27 August 2019 to discuss the proposed development. The only issue raised by Council at the pre-lodgement meeting was the removal of car parking spaces. Section 3.2 of this SEE provides a more detailed response to the issues raised by Council at this meeting. We understand Council is generally supportive of the proposed development subject to these matters being addressed.

The SEE concludes that this proposed development can be accommodated within the existing development in a manner that is consistent with the desired future character of the area and has no adverse amenity impacts. It is considered that it will deliver a suitable and appropriate development outcome for the site to ensure adequate safety measures are in place in the unlikely event of a fire and is therefore worthy of approval.

2. SITE ANALYSIS

2.1. Local Context

The site is located in the beachside suburb of Manly and is within the Northern Beaches local government area (LGA). The suburb is a popular destination with tourists due to its beach setting and easy ferry ride from the Sydney CBD. Manly's main commercial area is focused around The Corso between Manly Wharf and Manly Beach. The site is located in a residential area of Manly, north-west of Ivanhoe Park and bordering the suburb of Fairlight. A plan showing the local context of the site within the suburb of Manly can be viewed at Figure 1.

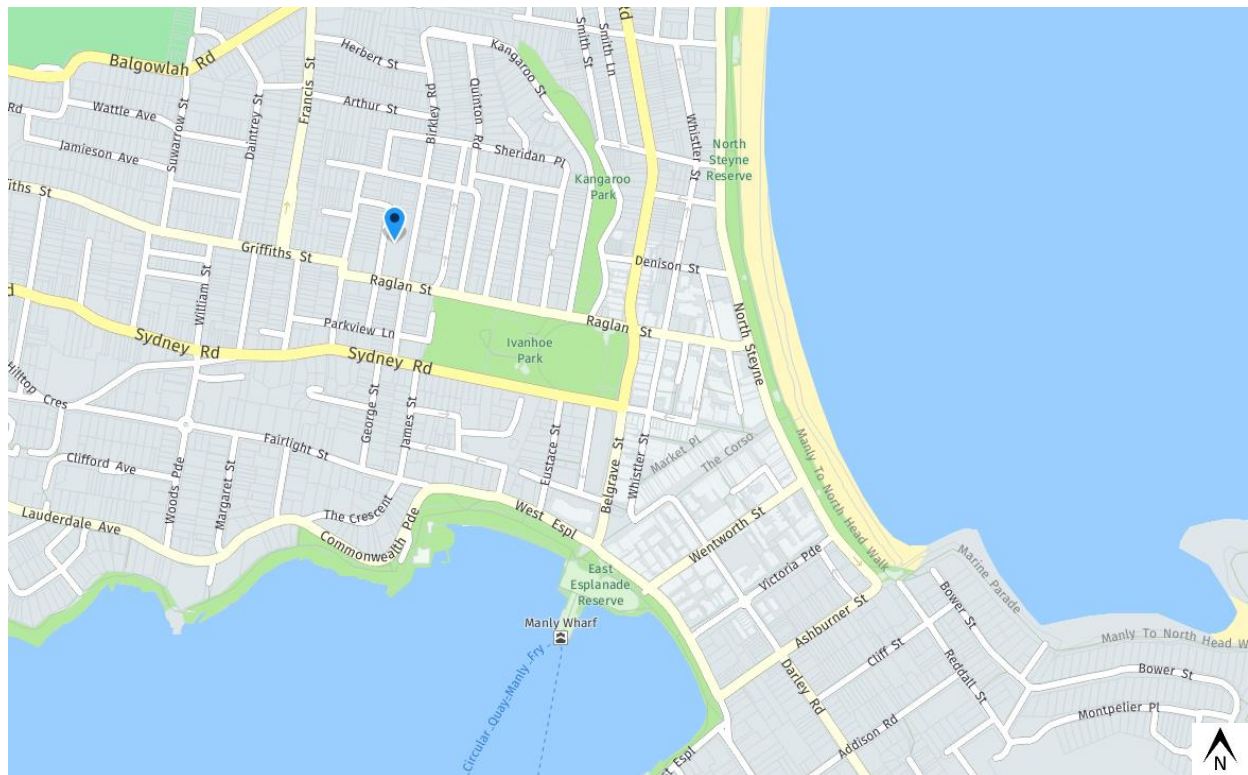


Figure 1: Local context plan with site identified by blue marker (Source: Nearmap)

2.2. Site Address and Legal Description

The site has a street address of 27-47 Birkley Road, Manly and is legally described as Lot 1 in DP 593980. It comprises one (1) large lot bounded by a public pathway to the north connecting Birkley Road and Birkley Lane, Raglan Street to the south, Birkley Lane to the east and Birkley Road to the west as shown in Figure 2.



Figure 2: Cadastral relationship of the site with site outlined in orange (SIX Maps)

2.3. Site Description

2.3.1. Existing Improvements

The site comprises a seniors housing development known as Uniting Wesley Heights Manly. The development comprises a mix of housing options that cater to the various levels of care required by seniors.

A five-storey L-shaped nursing home is located within the southernmost part of the site towards Raglan Street. The building comprises three (3) basement car parking levels accessed from various street frontages. The Level 1 and 2 basement car parking areas are accessed via separate driveways off Birkley Road. The basement car parking area at Level 3 of the building is accessed via a driveway off Birkley Lane. It is within the Level 1 basement car parking area for this building that the proposed development is to occur. Level 3 of the nursing home comprises communal areas, such as a library, in addition to car parking. Levels 4 and 5 of the nursing home contain the bedrooms and associated bathroom facilities for the home's residents.

An eleven-storey residential flat building containing independent living units (ILUs) is located in the site's centre.

Located between the nursing home and residential flat building is a four-storey building comprising double ILUs.

A four (4) storey semicircle-shaped hostel is located in the northern most part of the site with car parking below.

The buildings and communal outdoor areas are connected via a network of interrelated walkways and hallways.

Across the site there a total of two-hundred and eight (208) beds that are supported by fifty-seven (57) staff.



Figure 3: Aerial view of the site with the site outlined in orange (Source: Nearmap)

2.3.2. Topography

The site of the proposed development is within an existing basement level and is therefore generally level. The finished floor levels at the site of the proposed development are shown on the survey plan (**Appendix 1**).

2.3.3. Trees

The proposed development is located within an existing basement level and no trees are affected.

2.3.4. Hazards

The Planning Certificate obtained under Sections 10.7(2) and (5) of the EP&A Act and included at **Appendix 2**, confirms that the site is not identified as bush fire prone land or subject to flood related controls.

The Planning Certificate identifies the site as being subject to landslide risk under Clause 6.8 of the MLEP 2013. However, the MLEP 2013 Landslide Risk Map does not identify the site as land that is 'landslide risk'. It is noted that for the purposes of this inconsistency that the MLEP 2013 prevails as a statutory instrument.

2.3.5. Heritage

The site does not contain a heritage item/s or form part of a heritage conservation area. There are some properties in the site's locality the are identified as containing heritage items.

2.3.6. Soils and Geotechnical Conditions

The site has been identified as being affected by Class 5 acid sulfate soils.

The site is not identified as being affected by any geotechnical risk (landslip) as detailed in Section 2.3.4 above.

The Planning Certificate does not identify the site as being a known contamination hazard or risk, consistent with the long-term and ongoing residential use of the site as discussed in detail in Section 4.4.1 of this SEE.

2.3.7. Parking, Access and Transport

The site is well connected via public transport in the form of bus services along Sydney Road and local streets. The nearest bus stop to the site is approximately 75 metres north-east of the site on Augusta Road. Bus route 142 operates from this bus stop and connects Manly and Allambie via Manly Vale and Allambie Heights. Bus stops servicing this route are also located 175 metres west of the site on Raglan Street. Additionally, bus stops are located approximately 150 metres south of the site on either side of Sydney Road. Bus routes operating from these bus stops include the 141, 143, 144, 151, E50 and E70. These routes provide connection services between Manly and Austlink, Chatswood, Milsons Point and the city (Wynyard). The site is also located within 800 metre walking distance of the Manly Ferry Wharf. Services include the F1 Manly ferry service between Manly and Circular Quay and other private and fast ferries, which provide connections from Manly to Circular Quay, Darling Harbour, Watsons Bay and Milsons Point.

Uniting also provides a private bus service for residents living on the site as a means of facilitating social outings.

Car parking spaces are provided throughout the site for residents, staff and visitors of the development. These car parking spaces are located below the existing hostel and nursing home on the site. The car parking spaces below the existing hostel are accessed via a driveway off the northern part of Birkley Lane. The car parking spaces located below the nursing home are access via three (3) separate driveways. Two (2) of these driveways are located off Birkley Road and the remaining driveway is located off Birkley Lane. The location of the car parking areas and driveways are shown on the survey plans included at **Appendix 1**.

2.3.8. Site photos



Figure 4: View of nursing home looking west from Birkley Road. The vehicular entry/exit driveway provides access to basement level where the works are proposed (Source: Google Streetview)



Figure 5: View of nursing home looking north-east from the corner of Birkley Lane and Raglan Street (Source: Google Streetview)



Figure 6: View of nursing home and driveway access to basement, looking east from Birkley Lane (Source: Google Streetview)



Figure 7: View of existing ILUs (Doubles) and driveway access, looking south-west from Birkley Road (Source: Google Streetview)



Figure 8: View of ILUs located within the centre of the subject site, looking west from Birkley Road (Source: Google Streetview)



Figure 9: View of ILUs located within the centre of the subject site, looking south-east from Birkley Lane (Source: Google Streetview)



Figure 10: View of existing hostel at the northern part of the site, looking directly west from Birkley Road (Source: Google Streetview)



Figure 11: View of existing hostel at the northern part of the site, looking north-west from Birkley Road (Source: Google Streetview)

2.4. Surrounding Development

2.4.1. Overview

The subject site is located within a part of the suburb of Manly that generally comprises residential development. Surrounding development comprises a mix of residential accommodation types, including multi-storey residential flat buildings, two and three storey walk-ups, dual occupancies and dwelling houses. Ivanhoe Park (including Ivanhoe Oval and Manly Bowling Club) is approximately 75 metres south-east of the site.

2.4.2. Photos of Surrounding Uses



Figure 12: View of single-storey dwelling houses north of the site, looking north-west from Birkley Road (Source: Google Streetview)



Figure 13: View of residential flat building/walk-up south of the site, looking south-west from Birkley Road (Source: Google Streetview)



Figure 14: Further self-care units (i.e. ILUs) that form part of Uniting's overall Wesley Heights Manly aged care facility, looking north-west from Raglan Street (Source: Google Streetview)



Figure 15: View of dwelling houses and garages west of the site, looking south-west from Birkley Lane (Source: Google Streetview).



Figure 16: View of residential development to the east of the site, looking south-east from Birkley Road (Source: Google Streetview)

2.5. Relevant Planning History

The site has been subject to various DAs in the past to achieve the current development on the subject site. Table 1 provides a summary of the site's relevant planning history based on Council's online 'Property Search', as well as information obtained under the Government Information (Public Access) Act 2009 (GIPA).

Table 1: Summary of relevant planning history

DA No.	Development Description	Approval Date
169/74	Construction of Accommodation for Aged Persons with Associated Facilities to be known as 'Wesley Heights'	Unknown
3851/90	Additions to Nursing Home and Hostel	5 February 1991
5404/92	Alterations and Additions to Roof of Hostel	25 September 1992



Statement of Environmental Effects

Uniting Wesley Heights Manly

27-47 Birkley Road, Manly

19-173

November 2019

The above DAs primary relate to the use and construction of the existing development for seniors housing. There have been other DAs not listed in the table above for minor works on the site such as signage and awnings.

3. DESCRIPTION OF DEVELOPMENT

3.1. Overview

The proposed development is for internal works only within a basement level of the existing on-site development, being a water storage tank and separate fixed-on-site diesel and electrical pump sets, which are required to complete the fire suppression system (i.e. sprinklers) being installed in the eleven-storey ILUs.

The water storage tank will have dimensions of 5 x 3 x 2.5 metres high and a capacity of 29,000 litres. The water storage tank will be located on a 150 millimetre high concrete base on the existing car park base slab. Access to the tank will be provided via a single ladder with a 900 x 900 millimetre locked access hatch over.

The electrical fire sprinkler booster pump will serve as the primary sprinkler pump in the event of a fire. The proposed diesel fire sprinkler booster pump will be the secondary sprinkler pump from the water storage tank.

A chain wire mesh enclosure will be installed to maintain a 1 metre clear access perimeter around the fire pumps.

Refer to the engineering plans prepared by JHA Engineers (**Appendix 3**) for further details of the proposed development.

3.2. Pre-Lodgement Consultation

3.2.1. Council

A pre-lodgement meeting to discuss the proposed development was held on Tuesday 27 August 2019 with Council. The issues raised by Council and the applicant's response to these issues are detailed in Table 2 below. A copy of the formal pre-lodgement meeting notes as provided by Council can be found at **Appendix 4**.

Table 2: Pre-lodgement issues raised by Council

Issue	Response
Parking	
<p><i>Council raised concern with the proposed removal of three (3) vehicle parking spaces on-site for the purposes of accommodating for the fire water storage tank and pump which has been subject to a recent EPA order. Council advises that the proposal should demonstrate compliance with Schedule 3 – Part A1 of the Manly DCP that specifies the required parking rates. As the proposal seeks to reduce existing parking provisions, a Traffic and Parking Report (Parking Survey) is required to be prepared by a suitably qualified traffic consultant. Please refer to comments at the end of this report from Council's Traffic Engineer regarding specifics details that are to be contained within a parking survey.</i></p>	<p>A Parking Impact Statement has been prepared by TRAFFIX and is included at Appendix 5 of this SEE. An on-street car parking assessment was undertaken in accordance with the Council's traffic engineering comments. The findings of this car parking assessment are discussed in detail in Section 6.5.2 below.</p>

4. STATUTORY PLANNING CONSIDERATIONS

4.1. Overview

The relevant environmental planning framework considered in the preparation of this report comprises the following:

- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- State Environmental Planning Policy No. 55 - Remediation of Land;
- Manly Local Environmental Plan 2013;
- Manly Development Control Plan; and
- Northern Beaches Section 7.12 Contributions Plan.

Where relevant, these controls are addressed below.

4.2. Environmental Planning and Assessment Act 1979

4.2.1. Section 4.15 of EP&A Act 1979

Section 4.15(1) of the EP&A Act specifies the matters a consent authority must consider when determining a DA. The relevant matters for consideration under Section 4.15 of the EP&A Act are addressed in Table 3.

Table 3: Section 4.15 of EP&A Act 1979

Section	Comment
Section 4.15(1)(a)(i) Any environmental planning instrument (EPI)	Consideration of relevant EPIs is discussed in Section 4.
Section 4.15(1)(a)(ii) Any draft EPI	The draft State Environmental Planning Policy (SEPP) - Remediation of Land was publicly exhibited from 31 January 2018 to 13 April 2018. The intention of this draft SEPP is to repeal and replace the current SEPP 55 - Remediation of Land. The provisions contained within the exhibited draft SEPP are generally the same as those contained within the existing SEPP 55. The proposed development complies with the provisions of SEPP 55 as discussed in Section 4.4.1. Therefore, it is considered to comply with the provisions of the draft SEPP - Remediation of Land. No other draft EPIs have been or are currently subject to public consultation that are relevant to the site.
Section 4.15(1)(a)(iii) Any development control plan	Consideration of the Manly Development Control Plan (MDCP) is discussed in Section 5.1 of this SEE.

Section	Comment
Section 4.15(1)(a)(iiia) Any planning agreement	Not relevant to this application.
Section 4.15(1)(a)(iv) Matters prescribed by the regulations	Consideration of the various matters prescribed by the regulations is included at Section 4.3 of this SEE.
Section 4.15(1)(b) - (e)	Refer to Section 6 of this SEE for consideration of the matters for consideration under (b), (c) and (e). Matter (d) relates to submissions made to a DA in accordance with the EP&A Act or regulations and is a matter for consideration by the consent authority.

4.3. Environmental Planning and Assessment Regulation 2000

4.3.1. Clause 98 – Compliance with the BCA

Any building work must be carried out in accordance with the requirements of the Building Code of Australia (BCA) pursuant to the EP&A Reg and will be a prescribed condition of consent if the application is approved. A BCA statement prepared by Blackett Maguire + Goldsmith is included at **Appendix 6** of this SEE. This statement confirms that the proposed development complies or is capable of comply with the BCA requirements.

4.4. State Environmental Planning Policies

4.4.1. State Environmental Planning Policy No 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Lands (SEPP 55) establishes State-wide provisions to promote the remediation of contaminated land in reducing the risk to human health or the environment.

Clause 7 of the SEPP 55 requires that a consent authority must not grant consent to any development on land unless it has considered whether a site is contaminated land or potentially contamination land, and if it is, that it is satisfied that the land is suitable (or will be after undergoing remediation) for the proposed use.

The site has historically been used for residential purposes and therefore there is a low likelihood of contamination, noting the proposed development relates to internal works within a basement level and hence will not adversely impact the environment or human health by affecting the existing soil conditions.

4.5. Manly Local Environmental Plan 2013

4.5.1. Zoning

The site is zoned R1 General Residential under the MLEP 2013 as shown in Land Zoning Map extract at Figure 17.



Manly Local Environmental Plan 2013

Land Zoning Map - Sheet LZN_003

Zone	
E11	Neighbourhood Centre
E2	Local Centre
E3	Enterprise Corridor
E4	National Parks and Nature Reserves
E5	Environmental Conservation
E6	Environmental Management
E7	Environmental Living
R1	General Residential
R2	Low Density Residential
R3	Medium Density Residential
RE1	Public Recreation
RE2	Private Recreation
SP1	Special Activities
SP2	Infrastructure
SP3	Tourist
WT	Natural Waterways
Cadastre	
	Cadastre 01/12/2017 © Northern Beaches Council

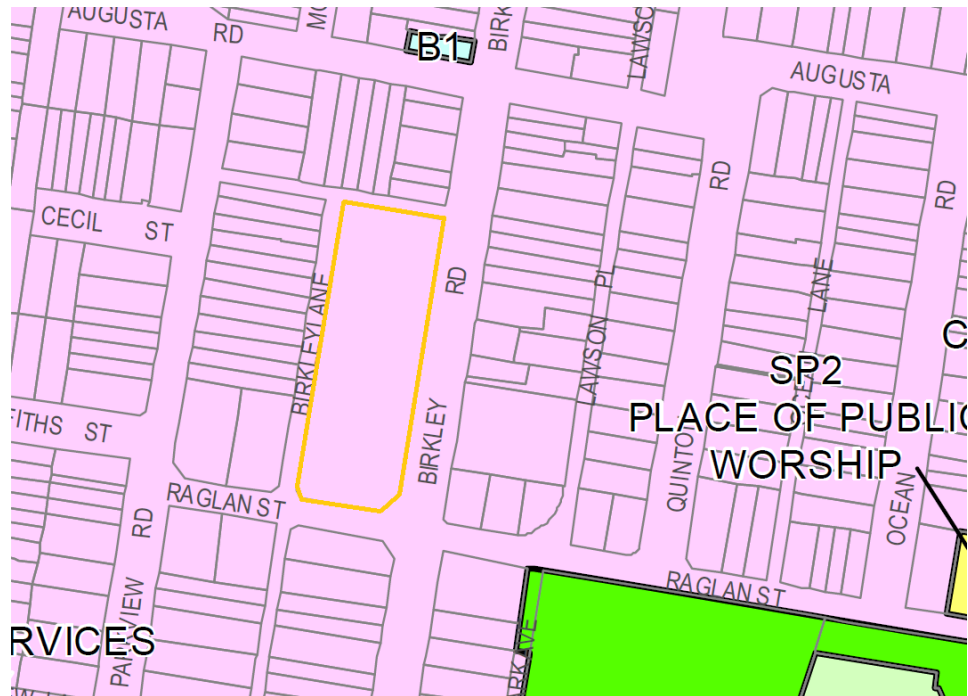


Figure 17: MLEP 2013 Land Zoning Map extract with site outlined in orange (Source: NSW Legislation)

4.5.2. Permissibility

The proposed development is considered ancillary to the existing seniors housing development on the site. 'Seniors Housing' is specifically permitted with consent in the R1 General Residential zone.

The existing seniors housing development on the site is consistent with the definition of 'seniors housing' in that it includes a residential care facility, hostel and self-contained dwellings as shown in Figure 3.

4.5.3. Objectives

Pursuant to the Land Use Table the objectives of the R1 General Residential zone under the MLEP 2013 are:

- To provide for the housing needs of the community.
- To provide for a variety of housing types and densities.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.

The proposed development is consistent with the objectives of the R1 General Residential zone under the MLEP 2013 in that it is ancillary to an existing seniors housing development that occupies the whole site. The existing seniors housing development includes residential care facility, hostel and self-contained dwellings and thereby provides for the housing needs of seniors living or wanting to live within the local community, noting that the level of care required by seniors is facilitated through different housing types. The proposed development does not seek to alter the number of beds/dwellings that currently exist on the site. Moreover, the proposed development does not preclude the redevelopment of the site or adjoining properties for non-residential land uses that provide facilities or services to meet the day to day needs of residents.

4.5.4. Height of Buildings

Pursuant to Clause 4.3 of the MLEP 2013 the maximum permitted height on the site is 8.5 metres. The proposed development comprises internal works wholly located within the basement of an existing building and does not alter the height of the building.

4.5.5. Floor Space Ratio

Pursuant to Clause 4.4 of the MLEP 2013 the maximum FSR permitted with consent on the site is 0.6:1. The proposed development comprises internal works wholly located within the basement of an existing building and does not alter the FSR of the site.

4.5.6. Heritage Conservation

The site is not identified under the MELP 2013 as a heritage item or part of a heritage conservation area (Figure 18). However, there are identified heritage items within the vicinity of the site as shown in the figure below.

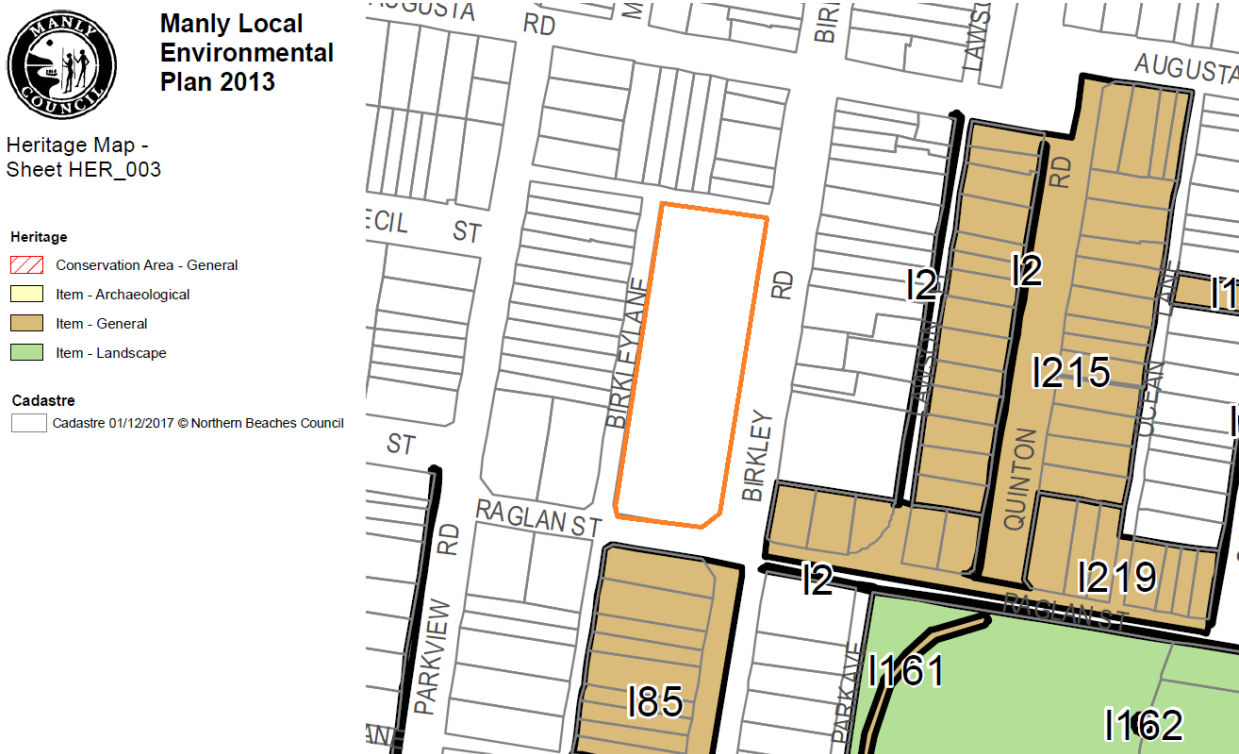


Figure 18: MLEP 2013 Heritage Map extract with site outlined in orange (Source: NSW Legislation)

As shown in the Heritage Map extract the heritage items in the vicinity of the site can be summarised as follows:

Table 4: Summary of heritage items in the vicinity of the site

Suburb	Item name	Address	Significance	Item No
All suburbs	All stone kerbs	Manly municipal area	Local	I2
Manly	Group of dwellings	1-25 Birkley Road	Local	I85
Manly	The Ivanhoe Loop (former tram track route)	Ivanhoe Park	Local	I161
Manly	Ivanhoe Park	Ivanhoe Park (bounded by Sydney Road, Belgrave Street and Raglan Street)	Local	I162
Manly	Group of houses	1-23, 25 and 27 Quinton Road and 1-7 Augusta Road		I215
Manly	Group of houses	62-72 and 76-84 Raglan Street	Local	I219

The proposed development comprises internal works only within the basement of the existing nursing home and will not result in any adverse impacts on heritage items in the site's vicinity. Consequently, a heritage assessment has not been undertaken and is not considered necessary for this application.

5. OTHER PLANNING CONSIDERATIONS

The relevant planning framework considered in the preparation of this report comprises:

- Manly Development Control Plan;
- Northern Beaches Section 7.12 Contributions Plan 2019.

5.1. Manly Development Control Plan

Consideration of compliance and/or consistency with the relevant provisions within the MDCP is provided below. The following parts of the MDCP are relevant to this proposal:

- Part 3 - General Principles of Development; and
- Part 4.1 Residential Development Controls.

There are no objectives or controls in the MDCP that relate specifically to the type of development proposed.

5.1.1. Part 3 General Principles of Development

The proposed development is consistent with the general principles for development contain in Part 3 of the MDCP in that it comprises internal works within the basement car park of any existing building and therefore will not affect the streetscape of this existing residential area or any heritage items or conservation areas in proximity. As the works are internal, there will be no amenity impacts on residents of the existing seniors housing development on the site or neighbouring properties in terms of views, overshadowing or overlooking. Therefore, the proposed development complies with the controls in Part 3.4 of the MDCP.

The proposed development complies with 3.8 of the MDCP in that a Waste Management Plan (WMP) for the construction of the proposed development has been prepared and submitted with the application (**Appendix 7**).

5.1.2. Part 4.1 Residential; Development Controls

The internal nature of the proposed development is such that the residential built form controls are not applicable.

Consideration has been given to Part 4.1.6 Parking, Vehicular Access and Loading (including Bicycle Facilities) in accordance with the pre-lodgement meeting notes that were provided by Council. Compliance with parking and access requirements contained within Schedule 3 of the MDCP is required by this Part.

The MDCP and Roads and Maritime Services (RMS) Guide to Traffic Generating Development do not contain any car parking rates that relate specifically to the existing seniors housing development on the site.

The proposed development results in the removal of three (3) car parking spaces from within the subject site. An on-street parking assessment was undertaken as part of the Parking Impact Statement at **Appendix 5**, which concluded sufficient on-street car parking is available to accommodate the 3 removed spaces.

Overall, this section of the SEE demonstrates the proposed development generally demonstrates full compliance with the relevant provisions of the Manly DCP or complies with intent.

5.2. Northern Beaches Section 7.12 Contributions Plan

The *Northern Beaches Section 7.12 Contributions Plan* is the applicable contribution plan to the site. This plan applies to land in the Northern Beaches LGA except for Dee Why Town Centre and Warriewood Valley. It is a public document that contains Council's policy regarding contributions that can be levied on development.

A Section 94E Direction was issued by the Minister under the EP&A Act on 14 September 2007. This Direction stipulated no development contributions could be imposed on consents related to the carrying out of developments for the purposes of any form of seniors housing as defined in the Seniors Housing SEPP.

The proposed development is ancillary to an existing seniors housing development and therefore if approved, it is considered that the DA would be exempt from the imposition for any conditions relating to contributions.

6. ENVIRONMENTAL IMPACT ASSESSMENT

6.1. Overview

This section of the SEE identifies and assesses the potential impacts resulting from the proposed development with specific reference to the matters for consideration under Section 4.15 of the EP&A Act.

6.2. Context and Setting

The context and setting of the site of the proposed development is described in Section 2 of this Statement.

The proposed development is compatible with the existing and desired future character of the locality, with the site and neighbouring properties containing residential development consistent with their R1 zoning. The proposed development is ancillary to the existing seniors housing development on the site in that it involves the installation of a fire water storage tank and pump-set that will be connected to a new fire suppression system (i.e. sprinklers) to be installed in the 11-storey building where the single ILUs are located. As the proposed development is located within the basement of an existing building on the site it will not be visible from the public domain or surrounding development and thus will not change the context/setting.

6.3. Built Environment

6.3.1. Height, Bulk, Scale and Setbacks

The proposed development does not involve any changes to the external façades of existing buildings. Therefore, the height, bulk, scale and setbacks of the existing seniors housing development will remain unchanged.

6.3.2. Amenity

The internal location of the proposed development will not impact the amenity of residents or neighbours. Due to its location within the basement of an existing building it will not result in any overshadowing, overlooking or loss of views from within the site or surrounding residential development. The pumps will only operate in the unlikely event of a fire and therefore will not result in unreasonable noise impacts.

6.3.3. Building and Construction

Compliance with the BCA will be demonstrated with the Construction Certificate documentation. However, the BCA Statement (**Appendix 6**) confirms the proposed development complies or can comply with the BCA.

A Construction Management Plan can be prepared by the appointed contractor, once the terms of any approval granted by Council are known. Accordingly, it is anticipated that Council will include appropriate conditions within any consent notice requiring the preparation and approval of a CMP prior to works commencing.

6.4. Natural Environment

As the proposal is entirely internal within an existing building, it will have no adverse impacts on the natural environment in terms of tree removal, flora, fauna, water management or the like. The fire pump component of the proposed development is only likely to generate noise when it is in operation, noting that it will only

be in operation in the unlikely event that there is a fire in the existing development. Construction impacts such as noise, vibration and water pollution will be managed and mitigated through appropriate construction management practices, which can be conditioned.

6.5. Movement and Access

6.5.1. Transport

The site is within 400 metres walking distance of bus services and within 800 metres of Manly Ferry Wharf. Figure 4 of the Parking Impact Statement (**Appendix 5**) demonstrates the site's proximity to public transport. Uniting also operates its own private shuttle bus from the site to assist with the transport of its residents.

6.5.2. Parking

That existing car parking on-site has been provided under past applications for the seniors housing development. The proposal will result in the loss of three (3) car parking spaces within the existing car park. A review of the site found that these 3 car parking spaces could not be accommodated elsewhere on the site. Therefore, an assessment was undertaken by TRAFFIX to identify the availability of on-street parking spaces. The Parking Impact Statement includes the findings of this on-street parking assessment. This assessment was undertaken on a Tuesday Thursday, and Friday between the hours of 8:00am and 6:00pm. It was conducted on the streets within 200 metres of the site and resulted in the following findings:

Table 5: Results of parking assessment

Date	No. Available On-Street Car Parking Spaces
Thursday 17 October 2019	118-154
Friday 18 October 2019	110-158
Tuesday 22 October 2019	111-156

These results demonstrate 100 to 158 on-street car parking spaces were available within 200 metres of the site, with an average availability of 134 car parking spaces during the three day study period. Therefore, TRAFFIX have concluded there is existing on-street parking capacity to accommodate the 3 spaces to be removed from the site.

6.5.3. Traffic

The proposed development is not of a nature to generate any additional traffic movements beyond those already generated by the existing seniors housing development and its residents, staff, visitors and deliveries.

6.5.4. Servicing / Waste

Demolition and Construction Waste

A Waste Management Plan (WMP) for the proposed development is included at **Appendix 7** of this SEE. The installation of the proposed will generate no waste during construction.

Operational Waste

The proposed development will not generate any waste during its ongoing use if the DA is approved. Furthermore, it will not result in any changes to the site's existing and ongoing waste management processes.

6.5.5. Accessibility

The proposed development will utilise the existing access arrangements to the Level 1 car parking area, being via the existing vehicular driveway off Birkley Road and the adjacent pedestrian entry to the building. A network of corridors, lifts and stairs within the existing development will ensure access to the car park is maintained.

6.6. Site Suitability

Noting that the proposed development is development that is ancillary to an existing seniors housing development, the suitability of the site for the proposal was established by the approval of the existing development on the site and the zoning of the site for R1 General Residential under the current MLEP 2013.

Council's online mapping and the Planning Certificate obtained under Section 10.7(2) and (5) of the EP&A Act confirm that the site is not bush fire or flood prone land and is not affected by any geotechnical risk (landslip) or contamination.

6.7. Social and Economic Effects

6.7.1. Crime and Safety

The proposed development will maintain the Crime Prevention through Environmental Design (CPTED) measures incorporated in the existing development. The garage door and controlled pedestrian access points (e.g. swipe cards) will restrict access to the development. Furthermore, the access hatch to the water storage tank will also be locked for access control and fencing will be provided around the perimeter of the pumps.

6.7.2. Social, Economic and Employment

The proposed development has a positive social, economic and employment impact in that it will improve the fire safety measures for the existing seniors housing development on the site to ensure compliance with the relevant building regulations and standards and will provide jobs during its construction/ installation.

6.7.3. Public interest

There are no unreasonable impacts that will result from the proposed development, therefore, the benefits of providing improved fire safety measures to an existing seniors housing development outweigh any disadvantage, and as such, the proposed development will be in the public interest.

7. CONCLUSION

This DA seeks approval for a water storage tank and fixed-on-site pump set at 27-47 Birkley Road, Manly.

In summary, the proposal is:

- an appropriate response to the context, setting, planning instruments and development guidelines and other considerations outlined in Section 4.15(1) of the EP&A Act.
- consistent with and appropriate to the desired future character of the site and surrounding locality in that it involves internal works within the basement of the existing nursing home on the site and therefore will not result in any changes to the use or external façades of the existing development, which is consistent with the residential nature and zoning of the site and surrounding locality.
- improve the amenity for the residents within the existing development with improved fire safety measures.
- have no adverse impacts on the environment, traffic, parking, drainage or other external features or services.

The benefits provided by the proposed development outweigh any potential impacts and is it is therefore considered to be in the public interest.

APPENDIX 1: SURVEY PLAN

Prepared by LTS

APPENDIX 2: PLANNING CERTIFICATE

Prepared by Northern Beaches Council

APPENDIX 3: ENGINEERING PLANS

Prepared by JHA Engineers

APPENDIX 4: PRE-LODGEMENT MEETING NOTES

Prepared by Northern Beaches Council

APPENDIX 5: PARKING IMPACT STATEMENT

Prepared by TRAFFIX

APPENDIX 6: BCA STATEMENT

Prepared by Blackett Maguire + Goldsmith

APPENDIX 7: WASTE MANAGEMENT PLAN

Prepared by the Applicant