

Former Manly Hospital LEP Amendment
Planning Proposal Report
150 Darley Road, Manly

On behalf of
Property & Development NSW
November 2020



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Executive Summary

This Planning Proposal has been prepared by Mecone on behalf of Property & Development NSW (PDNSW), part of the Department of Planning, Industry and Environment (DPIE), and relates to the former Manly Hospital site located at 150 Darley Road, Manly. The Planning Proposal satisfies the requirements of Section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Site Context and Description

The site is located at 150 Darley Road, Manly and is within the Northern Beaches Local Government Area (LGA) approximately 13.3km from the North Sydney Central Business District (CBD), 10km from Northern Beaches Hospital in Frenchs Forest and 5.9km from the Sydney CBD. It is irregular in shape and has an area of approximately 4.66 hectares.

The site has a primary northern frontage to Darley Road of 150m and a secondary north eastern frontage of 170m to North Head Scenic Drive. It is subject to significant level variations and grades down from 67m AHD in the north to 39m AHD in the south towards the foreshore of Shell Cove, North Harbour.

The site contains a number of buildings associated with the former Manly Hospital that were constructed in the 1920s and 1930s, while the rear of the site comprises an open at-grade car park and open space. The locally listed heritage building known as the 'Manly District Hospital' (former principal building) occupies the northern portion of the site where it interfaces with Darley Road.

The site is situated adjacent to the southern side of North Head, which forms part of Sydney Harbour National Park, and occupies broader Manly peninsula. The surrounding uses predominantly consist of education and health facilities as well as sites significant for their social and historical associations. The development to the immediate west and north relates to the St Patrick's Estate, which comprises a mix of uses, with residential beyond. The development to the direct north on the opposite side of Darley Road relates to the former St Patrick Estate Seminary and now accommodates the International College of Management. To the west of this site is Bear Cottage – NSW's only children's hospice. To the direct south the site adjoins Sydney Harbour National Park and beyond this lies North Harbour.

Intent of the Planning Proposal

The Planning Proposal aims to expand the range of permitted uses under Schedule 1 of MLEP 2011 at the site, whilst maintaining the primary role of the site as a health services facility. Pursuant to clause 2.5 of MLEP 2013 the planning proposal seeks to introduce additional permitted uses at the site including the following: a group home, community facility, educational establishment, food and drink premises, centre-based child care facility, indoor recreational facility, neighbourhood shop, function centre, respite day care centre and seniors housing.

The proposed additional uses reflect market sounding and needs analysis undertaken by the NSW Government and would enable complimentary health and wellbeing uses to be located at the site in conjunction with new health services facilities permitted under the existing zone. The Inclusion of the above land uses as additional

permitted uses under Schedule 1 of MLEP 2013 would enable the making of a site-specific DCP for the site. The site-specific DCP would include built form controls which manage height, bulk, and scale, as well as requirements relating to traffic, environmental considerations and heritage.

Strategic Merit

The proposed redevelopment of the site as a destinational health and wellbeing precinct is entirely consistent with the applicable strategic planning framework.

A key direction nominated by The Greater Sydney Plan is to support the growth and competitiveness of the Eastern Harbour City, including its Harbour CBD. Investment in health and social infrastructure is identified as integral to supporting the growth and competitiveness. Investment is to be targeted in designated health and education precincts.

In addition to investing in health and education precincts, the Plan identifies that an integrated planning approach for the delivery of health facilities is needed to ensure adequate access to a broad range of comprehensive services, including general practice, community health services, aged care, medical centres and pharmacies. This requires investment in health services outside of identified health precincts and in proximity to key nodes of activity.

Accessibility is to be enhanced through the co-location of health services and complementary uses such as research facilities, seniors housing and short-term accommodation for health purposes. This necessitates innovative approaches to the delivery of health services.

There is also an identified need for tailored health services that address the demands of the community. Health services for the ageing population is one such example. The Greater Sydney Plan notes the ageing population will require localised access to health services to ensure patients are close to relatives, social infrastructure and support networks which are pivotal to improving wellbeing.

The North District Plan is the applicable district plan to the site. It identifies the need to support the continued growth of designated health and education precincts, including the precincts located at Macquarie Park, Frenchs Forest and St Leonards. The site is located 10km distance from the Frenchs Forest Health and Education Precinct, which accommodates the recently constructed Northern Beaches Hospital. The hospital commenced operations in 2018 and now contains the health related services that previously formed part of Manly Hospital up until its closure in late 2018. The North District Plan identifies the need to foster the growth of this important health precinct and ensure the continued provision of acute health facilities that will service the District's growing population.

The North District Plan notes that there is a need to provide services and infrastructure to meet people's changing needs. This is of paramount importance given key demographic changes affecting the district. By 2036, the portion of its population aged above 85 is expected to grow by 85% and the number aged between 65 and 84 years to increase by 47%. The projected growth of these two population segments represents the greatest of any other age group. In addition, over 27,500 people in the district have a disability. In consequence, there is a pressing need for planning

outcomes to focus on accessibility and inclusion to ensure that young people, those with disabilities and the older population can easily access services.

The North District Plan situates the site within the Manly Strategic Centre which is distinctive for its cultural, tourist retail and entertainment uses as well as the recreational opportunities afforded by its scenic attributes. The North District Plan nominates a number of key actions for the Manly Strategic Centre, including the need to encourage diversified commercial activity and to further develop Manly's cultural, tourist, retail and entertainment uses.

In light of the above, the Planning Proposal and development of the site for the purposes of a health and wellbeing precinct aligns with the strategic planning framework in that it will:

- Support the competitiveness of the Eastern Harbour City by increasing the number of permissible employment generating uses across the site which will facilitate the generation of 273 jobs that will assist in meeting the target of 817,000 jobs for the North District by 2056;
- Provide tertiary education facilities that will support the localised workforce and the overall productivity of the North District;
- Adopt a place-based approach to the development of the site that capitalises on its landscape setting and historical/cultural assets;
- Provide ancillary uses that will support the viability of specialist health services currently not accommodated in nearby health and education precincts, which will also not detract from the viability of these precincts;
- Introduce services that satisfy the demands arising from the future AYAH and the broader community to precinct that will foster accessibility and inclusion by way of its innovative design;
- Deliver high quality residential care facilities that address the needs associated with changing demographics, including the unprecedented growth of the ageing population;
- Contribute to Manly's status as a Strategic Centre and its cultural and tourist related offerings by providing high quality recreational facilities, active retail uses and open space; and
- Support the collaboration between governments, community and businesses to increase the provision of health and social infrastructure.

Site Specific Merit

The Planning Proposal is considered to have significant site specific merit for the reasons outlined below.

The growing ageing population and the demand for wellbeing and mental health facilities are major challenges confronting communities into the future. The Planning Proposal will facilitate the transformation of the underutilised site to a fully integrated destinational health and well-being precinct. The precinct will support seniors housing alongside state-of-the-art health and wellbeing facilities. The provision of these uses will simultaneously generate a demand for additional social infrastructure and services such as retail, child care and recreational facilities. The site is ideally suited to provide

social infrastructure and an array of complementary uses in that it affords the opportunity for open space, cultural facilities and pedestrian linkages to the surrounding landscape. Collectively, these attributes will enhance the amenity of the precinct and improve Manly's cultural and tourism offerings.

Supporting subconsultant reports confirm that following the recent construction of the Northern Beaches Hospital, there is sufficient health infrastructure in the locality to support the community's acute health needs. Conversely, there is a lack of non-acute health and wellbeing related uses. It is considered that the Planning Proposal provides the opportunity to address the demand for non-acute health services.

The Planning Proposal will support the delivery of a range of uses that will encourage job creation and educational opportunities which is appropriate for the site given it has historically accommodated a health facility and is in proximity to surrounding educational institutions.

In summary, the Planning Proposal demonstrates site specific merit in that it will:

- Improve the local community's access to high quality residential care facilities for seniors and people with a disability;
- Provide tertiary educational uses which are appropriate for the site's context given its proximity to surrounding educational institutions;
- Co-locate residential care facilities with an array of complementary uses to be to facilitate ease of access to services and social infrastructure;
- Protect and repurpose the site's existing heritage buildings, allowing for their continued interpretation;
- Facilitate the provision of publicly accessible space and enhance connections between the subject site and the surrounding landscape;
- Protect and conserve the site's ecological values;
- Is serviced by adequate infrastructure, public transport and utilities;
- Provide cultural and creative facility to recognise and honour the site's Aboriginal culture;
- Encourage job creation in proximity to homes and infrastructure;
- Not give rise to any adverse environmental impacts; and
- Will minimise environmental impacts relative to the site's former hospital use by providing reduced traffic generation impacts.

Conclusion

The Planning Proposal is entirely consistent with the strategic planning framework and demonstrates site specific merit. It is therefore considered that the proposal meets the strategic and site specific merit tests. For the reasons outlined in the following sections, the proposal will deliver a myriad of public benefits and will provide minimal environmental impacts, and warrants support.

1 Introduction

The Planning Proposal has been prepared by Mecone on behalf of the Proponent Property & Development NSW (PDNSW), a part of the Department of Planning, Industry and Environment (DPIE) in relation to the former Manly Hospital site located at 150 Darley Road, Manly.

The Planning Proposal aims to expand the range of permitted uses under Schedule 1 of MLEP 2013 at the site, whilst maintaining the primary role of the site as a health services facility. Pursuant to clause 2.5 of MLEP 2013 the planning proposal seeks to introduce additional permitted uses at the site including the following: a group home, community facility, educational establishment, food and drink premises, centre-based child care facility, indoor recreational facility, neighbourhood shop, function centre, respite date care centre and seniors housing.

The Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* (the EP&A Act) and The NSW Department of Planning, Industry and Environment's (DIPE's) *A Guide to Preparing Planning Proposals*.

Specifically, the Planning Proposal includes the following information:

- A description of the site in its local and regional context;
- A statement of the objectives and intended outcomes of the proposed instrument;
- An explanation of the provisions that are to be included in the proposed instrument; and
- The justification for those provisions and the process for their implementation including:
 - Whether the proposed instrument will comply with relevant directions under Section 9.1;
 - The relationship to the strategic planning framework;
 - Environmental, social and economic impacts;
 - Any relevant State and Commonwealth interests; and
 - Details of the community consultation that is to be undertaken before consideration is given to the making of the proposed instrument.

The Planning Proposal is accompanied by the following accompanying reports in support of the LEP Amendment proposed:

- Appendix 1 – Urban Design Report
- Appendix 2 - Community Needs Analysis and Social Strategy
- Appendix 3 - Heritage Assessment Report
- Appendix 4 - Aboriginal Due Diligence Assessment
- Appendix 5 - Ecological Constraints Assessment
- Appendix 6 - Preliminary Transport Assessment
- Appendix 7 - Bushfire Report

- Appendix 8 - Geotechnical Investigation
- Appendix 9 - Stormwater Strategy Report
- Appendix 10 – Public Domain and Landscaping Strategy
- Appendix 11 – Services Strategy

1.1 Proponent and Project Team

The planning proposal has been informed by the following accompanying reports prepared by the project team:

Table 1. Project Team	
Specialist Report	Consultant
Urban Planning Assessment	Mecone
Architects / Urban Design Consultant	Cox Architecture
Traffic Consultants	JMT
Bushfire Consultants	Peterson Bushfire
Geotechnical Engineers	JK Geotechnics
Biodiversity Consultants	Narla Environmental
Heritage Consultants	Paul Davies Pty Ltd
Archeological Consultants	Dominic Steele Consulting Archaeology
Civil Engineers	Arcadis
Social Planners	Ethos Urban
Community Engagement Consultants	Urbis

2 Site Information

2.1 Site Context

The site is known as 150 Darley Road (Lot 2619 in DP 752038, Lot 2727 in DP 752038, and Lot 2774 in DP752038), Manly in the Northern Beaches Local Government Area (LGA) approximately 1km east of the Manly Town Centre, 10km south east of Northern Beaches Hospital in Frenchs Forest and 17km north east of the Sydney Central Business District (CBD). The site is located on the southern side of the Manly peninsula fronting Spring Cove, North Harbour. It interfaces with the historic St Patrick's Estate, North Head Sanctuary and Sydney Harbour National Park.

The locality surrounding the site is characterised by a mix of uses, including low-scale residential development and educational establishments that include the International School of Management, St Paul's Catholic College, and Australian Institute of Management. It is also surrounded by medical facilities including the children's hospice known as Bear Cottage as well as historic sites such as the Barracks Precinct and North Head Quarantine Station.

A site context map is provided at **Figure 1** and an aerial photograph of the site is shown at **Figure 2**.



Figure 1 – Site Context Map

Source: Mecone/Mosaic

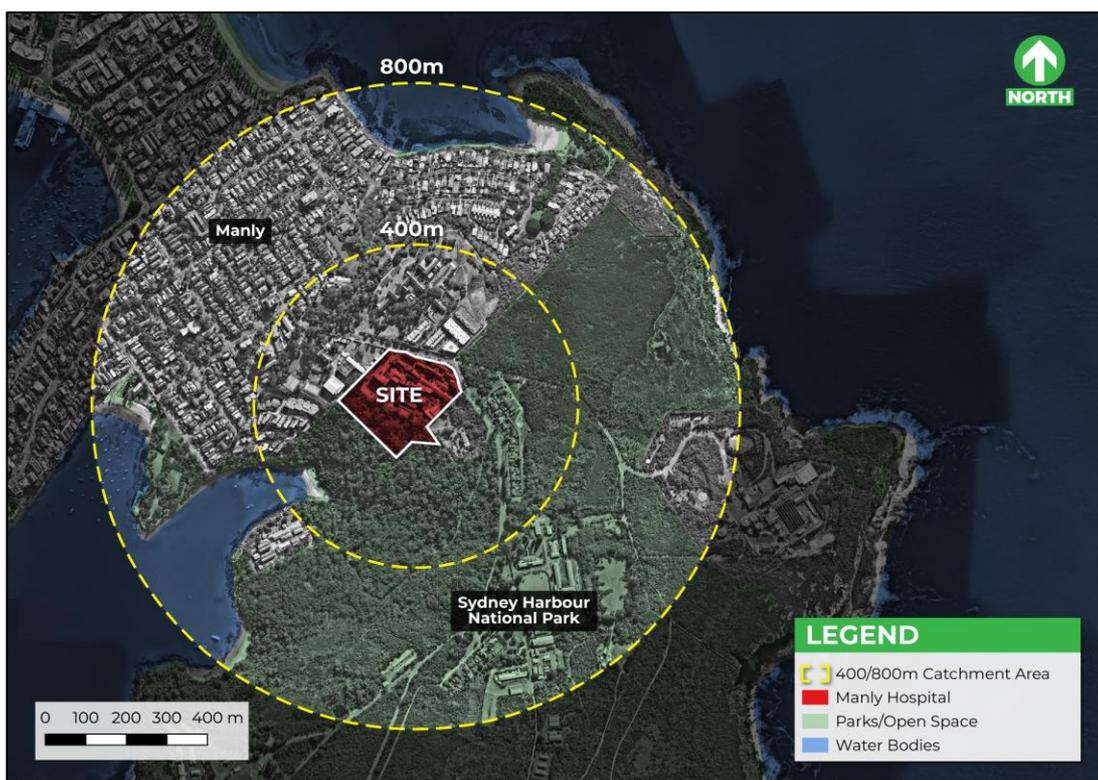


Figure 2 – Site Aerial Map

Source: Mecone/Mosaic

2.2 Site Description

The table below provides a description of the subject site.

Table 2. Site Description	
Item	Description
Legal description	The site is legally described as: Lot 2619 in DP 752038, Lot 2727 in DP 752038, and Lot 2774 in DP752038.
Total area	4.66 hectares
Address	150 Darley Road, Manly
Site Topography	The site descends from 67 AHD taken from the far northern point at Darley Road to 39 AHD at the southern boundary.
Existing use and building	<p>The site contains a number of unoccupied buildings associated with its historic use as a hospital. Combined they contribute to the former hospital's east, north and south wings.</p> <p>The development within the east and north wings consists of low-scale buildings which are generally characterised by a red masonry brick materiality. The development towards the south consists of more contemporary built form additions.</p>

Table 2. Site Description

	An open at-grade carpark surrounds these buildings in the southern portion of the site.
Heritage	Sited behind the hospitals 'North Wing' is a local heritage item. The item is known as the Manly District Hospital (former principle building) under the Manly LEP 2013 and is exemplary of an Inter-War Georgian Revival style building. In addition, whilst not identified as being heritage items under the Manly LEP 2013, the site contains a number of other buildings of high heritage value requiring conservation in the future.
Access and Public Transport	The site's primary vehicular egress/ingress point is located on Darley Road and permits entry to the former hospital's rear open car park and its northern and eastern wings. A secondary access point for emergency vehicles is located further eastward on Darley Road. An access point is also accommodated on North Head Scenic Drive and provides entry to an open car park located on the eastern edge of the site.
Surrounding Uses	The surrounding development / land uses are as follows: North: The development relates to St Patrick's Estate which is occupied by the International School of Management and sited directly opposite the site. South: The site interfaces with dense bushland which forms part of the Sydney Harbour National Park. Further southward lies Collins Beach which forms part of the Spring Cove harbor foreshore. West: To the immediate west the site adjoins St Paul's Catholic College, which forms part of the St Patrick's Estate. The recently constructed Shell Cove residential precinct is located further to the south west. East: North Head Scenic Drive and Collins Beach Road bound the site to the immediate north west and south west, respectively. Further south east lies North Head Sanctuary and North Head headland, which form part of Sydney Harbour National Park and occupy a large extent of the Manly Peninsula. Low scale residential development is located further eastward along North Head Scenic Drive.
Public Transport	The site is serviced by bus services (route 135) from Darley Road which provides connections to the Manly Town Centre and Warringah Mall. Additional ferry and bus services (171X and E71) are accessible from West Esplanade within the Manly Town Centre and provide connections to North Sydney CBD and the Sydney CBD.

The photos below further depict the existing development contained within the site.



Figure 3 – Primary Entrance From Darley Road Looking South East
Source: Mecone



Figure 4 – View of the South Wing and Open Car Park
Source: Mecone



Figure 5 – Historic Building facade Located Within the Site
Source: Mecone



Figure 6 – Surrounding Bushland Looking South to Collins Beach
Source: Mecone

2.3 Surrounding Context

The site is surrounded by a mix of land uses predominantly consisting of health and education facilities, residential development, historic sites and national park.

North

To the direct north beyond Darley Road lies the historic St Patrick's Estate. Positioned within this Estate and directly opposite the site is the educational facility known as the International College of Management which occupies a historic 19th Century landmark building which formally operated as Australia's first National Catholic Seminary. The college is surrounded by extensive areas of parkland.

East

To the immediate east the site is bounded by dense vegetation which forms part of North Head Sanctuary and Sydney Harbour National Park. Low density residential development is located further eastward on the other side of North Head Scenic Drive and consists of detached dwellings that reach one (1) storey in height. Beyond this lies the Barracks Precinct and Sydney Harbour National Park.

South

To the south, the site adjoins dense vegetation associated with the Sydney Harbour National Park. Collins Flat Beach is located further southward and beyond this Spring Cove which forms part of Sydney Harbour. North Head lies to the south east and forms part of Sydney Harbour National Park. It occupies the far southern portion of the Manly Peninsula and accommodates a number of historic sites, scenic walkaways and landmarks.

West

To the immediate west, the site is bounded by St Paul's Catholic College which occupies the southern portion of the St Patrick's Estate. St Paul's Catholic College accommodates a number of educational buildings and an open at-grade car park which interfaces with the site's western boundary. The development further westward consists of low scale residential housing and the historically important Barracks Precinct which comprises a complex of former defence buildings associated with Australia's School of Artiller.

Photographs of the surrounding development are depicted on the follow page of this report.



Figure 7 – International College of Management
Within St Patrick's Estate
Source: Mecone



Figure 8 – Low Scale Residential Housing to the East
Source: Mecone



Figure 9 – Collins Beach and Surrounding National
Park Viewed Looking East
Source: Mecone



Figure 10 – St Paul's College Viewed Looking South
from Darley Road
Source: Mecone



Figure 11 – Entrance to the Australian Institute of
Police Management
Source: Mecone



Figure 12 – Entrance Road to North Head Sanctuary
Viewed Looking East
Source: Mecone

2.4 Existing Statutory Planning Context

The site is within former Manly portion of the Northern Beaches Local Government Area. Therefore, Manly Local Environmental Plan 2013 (MLEP2013) is the applicable local planning instrument to the land.

Land use zoning

The site is zoned SP2 Infrastructure (Health Services Facility) and E2 Environmental Conservation as shown in the figure below.

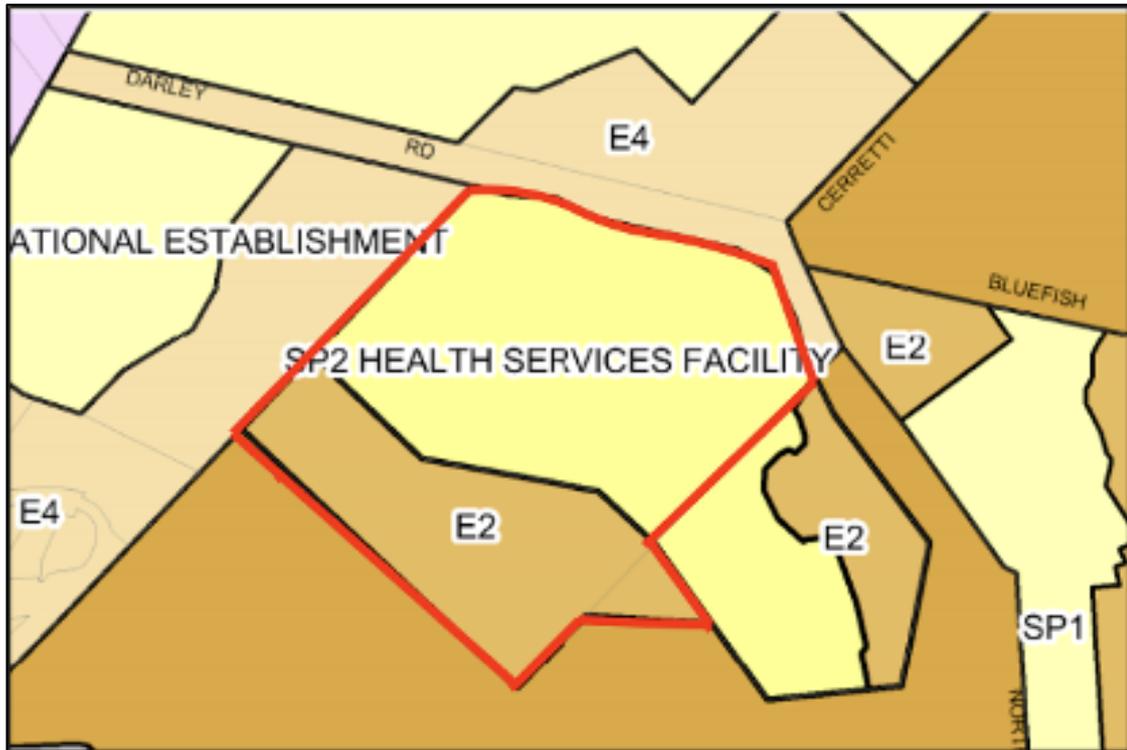


Figure 13 – Zoning Map Extract
Source: MLEP 2013

Heritage

Schedule 5 of identifies an item of heritage significance on the site. The item is known as Item 133 – Manly District Hospital (former principle building) which occupies Lot 2619 DP 752038. The building is significant for being exemplary of an Inter-War Georgian Revival style building. In addition, the site is surrounded by several other heritage items of local significance.



Figure 14 – Heritage Map Extract
Source: MLEP 2013

Other Applicable Development Standards and Provisions

The table below provides an overview of principal development standards and provisions within the MLEP 2012 which apply to the site.

Table 3. MLEP Overview	
Manly LEP 2012	
Clause 4.1 – Minimum Subdivision Lot Size	The land is NOT identified as having a minimum lot size.
Clause 4.3 – Height of Buildings	The site is NOT subject to a maximum building height.
Clause 4.4 – Floor Space Ratio	The site is NOT subject to a floor space ratio.
Clause 6.5 – Terrestrial Biodiversity	The site is identified within terrestrial biodiversity mapping in accordance with clause 6.5.
Clause 6.7 - Wetlands	A portion of the site in the south east is identified as a local wetland in accordance with clause 6.7.
Clause 6.9 – Foreshore scenic protection	The site is identified as being within the Foreshore Scenic Protection Area in accordance with the Foreshore Scenic Protection Area Map. As a result, clause 6.9 of the MLEP 2012 applies to the site.
Clause 6.14 – Requirement for Development Control Plan	The site is identified on the Key sites map as “Dalwood Children’s Hospital & Manly Hospital”. As such, development at the site can only be considered after a development control plan has been prepared and adopted for the land in accordance with Clause 6.14.

3 Project Overview

The former Manly Hospital was established in 1896 and operated until October 2018. Its services have since been transferred to Northern Beaches Hospital in Frenchs Forest and the site is now unoccupied, with public access not permitted.

In early 2017, a Project Steering Advisory Committee (PSAC) was formed comprising of representatives from the local community, Northern Sydney Local Health District, Northern Beaches Council, NSW Health and MP James Griffin. The intent of the PSAC was to develop a vision for the site reflective of community values.

In November 2018, the NSW Government earmarked the site as being suitable to deliver Australia's first Adolescent and Youth Adult Hospice (AYAH). The hospice will be delivered by NSW Health and support young adults aged between 18 up until their early thirties who suffer from life-limiting illnesses. It will provide respite, symptom management and end-of-life care. It should be noted that, while it is related, the AYAH is being developed separately from the broader health and well-being precinct, which is the focus of this planning proposal.

Throughout 2019 and into the first quarter of 2020, investigations were undertaken on behalf of the NSW Government exploring opportunities for adaptive re-use and development of the site, complimentary to the Youth Hospice, that would serve to ensure it continued to be a meaningful public asset into the future. Investigations considered redevelopment of the site for health, well-being, and related uses. Investigative activities undertaken occurred in consultation with the PSAC and included market sounding exercises, needs-based analysis, and extensive community consultation. In addition, COX Architecture undertook urban design analysis and preliminary site master planning exercises, the details of which accompany this report (Appendix 1). Urban design and master planning of the site are intended to be developed further in consultation with the community.

Following the activities described above being undertaken, a planning proposal was identified as being required to permit additional uses on the land before a site-specific development control plan could be prepared in accordance with Clause 6.14 of MLEP 2013. The intent of the planning proposal would be to facilitate additional permitted uses not strictly permitted under the current zoning of the site.

In the event the planning proposal is supported, it is intended to then progress with the making of a site-specific DCP for the site. The site-specific DCP will manage built form aspects of the site and be prepared in consultation with interested and affected parties including the community, PSAC and Council.

Following the making of the DCP, a detailed design development application will then be progressed.

3.1 Development Concept

Preliminary Urban Design Analysis and Master Planning

A draft concept masterplan and preliminary urban design analysis have been undertaken by COX Architecture and provided in Appendix 1 of the Planning Proposal Report. The master plan is indicative only and seeks to demonstrate how the site might be redeveloped with the proposed mix of uses. Once refined further, urban design

and master planning undertaken will assist in inform built controls of the site-specific DCP.

The draft concept masterplan illustrates the general location of the envelopes for the envisaged health and wellbeing precinct and provides for the following:

- Site preparation works including demolition and excavation;
- The provision of 10 building envelopes and the adaptive reuse of potentially heritage significant items;
- The reinstatement of open car parking areas within the rear of the site;
- Soft landscaping and public domain upgrades; and
- Tree removal and replacement planting.



Figure 15 – Preliminary Concept Master Plan

Source: Cox Architecture

Public Domain and Landscaping

A comprehensive Public Domain Strategy and Landscape Strategy has been prepared by Tract and is included at Appendix 10. It details that the conceptual landscaping and public domain approach for the site is informed by the following objectives:

- *Enhancement of Pedestrian Linkages:* To facilitate potential links to Sydney Harbour National Park and enhance activity along the streetscape whilst improving pedestrian amenity;
- *Integration:* To facilitate the integration of the landscape and built form with the surrounding education, residential, recreational and conservation uses;
- *Protection of Significant Places:* To protect key spaces, places, view corridors and destinations; and
- *Revitalisation:* To enhance the built and natural environment and to revitalise existing landscapes.

The indicative landscape and public domain strategy is displayed in the image below. Full details are provided in Appendix 10 of the planning proposal report.



Figure 16 – Proposed Public Domain and Landscape Strategy
Source: Tract

3.2 Site Specific Development Control Plan

The site-specific DCP will be informed by a comprehensive urban design analysis and a review of the site's environmental constraints and opportunities.

It will provide a framework for future development at the site which achieves the following:

- Delivers a world-class health and well-being precinct that is able to service the needs of both the local and broader community;
- Provides a development outcome that protects and accentuates the built, natural and heritage attributes of the site and its surrounds;
- Maintains the character of the area by adaptively reusing the existing heritage buildings contained within the site and revitalising existing landscapes;

- Respond to the site's environmental and cultural opportunities and constraints; and
- Provide uses complementary to the health and community facilities that will support the precinct's long-term financial viability, provide a therapeutic environment for patients, and address the demand for other key services and social infrastructure.

4 Planning Proposal Overview

Section 3.33 of the EP&A Act outlines the contents required of a Planning Proposal. The DPIE's *Planning Proposals: A Guide to Preparing Planning Proposals (the Guide)* provides further detail with regards to the requirements. The Guide and Section 3.33(2) of the Act details that a Planning Proposal must include the following components:

- **Part 1** – A statement of the objectives and intended outcomes of the proposed instrument.
- **Part 2** – An explanation of the provisions that are to be included in the proposed instrument.
- **Part 3** – The justification for those objectives, outcomes and the process for their implementation, including:
 - Need for the Planning Proposals
 - Relationship to strategic planning framework
 - Environmental, social and economic impact
 - State and Commonwealth interests
- **Part 4** – Maps, where relevant, to identify the intent of the Planning Proposal and the area to which it applies.
- **Part 5** – Details of the community consultation that is to be undertaken on the Planning Proposal.

4.1 Part 1 - Objectives and Intended Outcomes

The Planning Proposal intends to amend the Manly Local Environmental Plan 2013 (MLEP 2013) to allow for additional permitted uses at the site. This will be achieved by permitting additional uses under Schedule 1 pursuant to clause 2.5 of the MLEP 2013.

The LEP amendment proposed will enable the making of a site-specific DCP which will inform the sites redevelopment in the future, reflective of extensive market sounding, needs-based analysis and community and stakeholder engagement undertaken to date by the relevant NSW Government Departments.

In summary, the objectives and intended outcomes of the planning proposal are as follows:

- Facilitate the redevelopment of the site for the purposes of a vibrant health and wellbeing precinct by permitting additional uses currently prohibited under existing zoning;
- Enable the preparation of a site-specific DCP reflective of the extensive market sounding, needs-based analysis, and community and stakeholder engagement undertaken to date by the NSW Government;
- Ensure that the site remains appropriately zoned and is retained for the primary use of a health services facility and is not developed for undesirable purposes;
- Preserve the site's important ecological values and biodiversity values through the retention of environmental zones at the site;
- Improve connectivity to the surrounding landscape and national park for patients, staff and visitors;
- Support the growth of the health services sector in the Northern Beaches which is forecast to be the fastest growing sector over the next 20-years; and

- Provide an employment generating use that will assist in achieving the Eastern District's job targets.

4.2 Part 2 – Explanation of Provisions

The planning proposal seeks to achieve the intended outcomes outlined in 4.1 of the planning proposal report through the introduction of additional permitted uses pursuant to clause 2.5 of the MLEP 2013. These uses would be permitted under 'Schedule 1 Additional Permitted Uses' as detailed further below.

Built aspects of the future development would continue to be managed in accordance with Clause 6.14 of MLEP 2013, which requires a site-specific DCP to be prepared prior to a development application being considered by the consent authority.

Schedule 1 Additional Permitted Uses

To achieve this desired outcome, the Planning Proposal amends the MLEP 2013 to include site specific additional use provisions. Pursuant to clause 2.5 of the MLEP 2013, the following provisions are to be introduced to Schedule 1 Additional Permitted Uses:

5 Use of certain land at 150 Darley Road, Manly

- 1) *This clause applies to land at 150 Darley Road, Manly, being Lots 2728 and 2619, DP 752038.*
- 2) *Development for the purpose of a health services facility is permitted with development consent on Lot 2728, DP 752038.*
- 3) *Development for the purpose of a group home, community facility, educational establishment, food and drink premises, centre-based child care facility, indoor recreational facility, neighbourhood shop, function centre, respite day care centre and seniors housing is permitted with development consent on Lot 2619, DP 752038.*

The site-specific provision will reinforce the intent for this Planning Proposal to deliver a multi-functional destination health and well-being precinct, whilst retaining its primary purpose as a health services facility.

Clause 6.14 Requirements for Development Control Plans

A site specific DCP will continue to be required to be prepared in accordance with Clause 6.14 MLEP 2013 and will provide detailed development controls to be addressed by future development.

The site specific DCP will nominate a range of controls pertaining to the siting of the envelopes, maximum heights, setbacks and general and site-specific heritage provisions. Its purpose will be to provide the consent authority with surety that a future Development Application will achieve an appropriate built form outcome.

4.3 Part 3 – Justification

4.3.1 Section A - The need for a Planning Proposal

Q1. Is the Planning Proposal a result of any strategic study or report?

The Planning Proposal is not the result of any specific strategy study or report. The Planning Proposal has been initiated by the Proponent in response to market sounding, a comprehensive Community Needs Analysis and extensive stakeholder and community consultation. The findings of these studies and the various consultation initiatives confirm that the site is ideally suited to accommodate non-acute health services and wellbeing related uses that are not strictly permitted under the current SP2 Infrastructure (Health Services Facility) zoning.

Market sounding was undertaken by Ernst and Young in early 2020 to ascertain the type of uses that would be suitable for the site. The findings confirmed support for the redevelopment of the site for health, retail, community, and residential care facilities for seniors and veterans as well as family support accommodation. The key findings are as follows:

- The site's isolation from designated health and education precincts (i.e. Frenchs Forest) means it is less suited for accommodating acute hospital services and more suited to non-acute health and wellbeing related services;
- The provision of residential care facilities across the site will generate a demand for other complementary uses such as retail, recreational and community uses;
- The delivery of a mix of uses across the site will foster community interaction and a sense of place, which are essential attributes of a wellbeing precinct and integral to the success of a future residential care facility;
- It was concluded by stakeholders that the future commercial viability of the site would be reliant on a mix of uses, including aged care, seniors housing or alternative housing; and
- In light of the above, there was a recognition that the provision of community uses needs to be balanced alongside the long-term commercial viability of the site as financial returns will be imperative to maintaining public access to the site.

Similar findings were reflected in the outcomes of the stakeholder and community consultation. The consultation process confirmed that there is strong community support for the provision of community related uses across the site which will support a range of activities and address the needs of the local community.

In addition to the above, the Community Needs Analysis identifies that the future demand for acute health services will be met by the nearby Northern Beaches Hospital. In light of this, there is a growing demand for non-acute health services. The site's locational benefits, including access to view corridors and landscapes, are conducive to supporting such services.

Key demographic trends, including the growing ageing population, provide an impetus for the delivery of residential care facilities across the site. The provision of

residential care facilities and health related services will also generate a demand for complementary uses, such as retail, food and beverage, recreational and open space areas. Further discussion is provided in the Community Needs Analysis at Appendix 2.

This Planning Proposal responds to the future demand for the aforementioned uses by facilitating their inclusion across the site. It is considered that these uses are integral to achieving a fully integrated destinational health and wellbeing precinct.

In addition to the above, the proposal will deliver on a range of strategic objectives, including the Greater Sydney Region Plan, the North District Plan and the LSPS. Further discussion is provided in **Section 4.4**.

Q2. Is the Planning Proposal the best means of achieving the intended outcome?

Yes.

In preparing this Planning Proposal, four options were considered to facilitate the intended outcomes of the planning proposal. These are listed and discussed below:

- Option 1: Do nothing.
- Option 2: Lodge a Development Application.
- Option 3: Prepare a Planning Proposal to amend the zoning, height and FSR development standards set out by the MLEP 2013.
- Option 4: Planning Proposal to allow additional uses under Schedule 1 Pursuant to Clause 2.5 of MLEP 2013

Option 1: Do Nothing

Option 1 relates to the 'do nothing' option and involves leaving the site in its current underutilised, state. The site's services have been relocated to Northern Beaches Hospital, leaving it vacant. It is considered that this option represents a loss to the community as the site will cease to be a meaningful public asset and not be developed to its potential.

In contrast, the Proponent's vision provides an opportunity to address the growing demand for a range of community care services, including aged care, mental health and respite services for the terminally ill. Further, the delivery of a range of complementary health and well being uses, and recreational facilities, will provide needed ancillary services and allows a future development to capitalise on the site's proximity to scenic and historic landmarks.

It is considered that the introduction of additional permitted uses to the MLEP 2013 is required in order to derive the greatest value from the site and address the growing health needs of the community. As such, Option 1 is not considered viable.

Option 2: Development Application

Option 2 involves the preparation and lodgment of a Development Application with Council. The site is predominantly zoned SP2 Infrastructure (Health Services Facility) and therefore permits health services, including uses that are ancillary or incidental to a health facility.

If Option 2 were to be pursued, the current development concept would not be achievable given that many of the potential uses expressed to be of interest during market sounding and community stakeholder engagement are not strictly ancillary or incidental to a health facility, and are therefore non-permissible. Subsequently, a future development would be unable to optimise the full development potential of the site or maximise the opportunities it presents under current zoning provisions and is therefore not considered viable.

In addition, the potential to deliver on the objectives nominated by the strategic planning framework would be considerably reduced. In particular, the need to provide accommodation and services for the ageing population and recreational, cultural and tourist facilities in accordance with the vision for the Manly Strategic Centre.

Option 3: Planning Proposal to Rezone the Site and introduce Height and Floor Space Ratio Development Standards

Option 3 pertains to the submission of a Planning Proposal that seeks a partial rezoning of the site to B4 Mixed Use to facilitate the delivery of uses that are not strictly ancillary but yet complementary to the health care use.

In consultation with Council during the pre-lodgment phase, it has been determined that a B4 Mixed Use zoning is at odds with the intended health and well-being focused uses and could potentially precipitate the inclusion of incompatible commercial uses.

Furthermore, it was agreed that built form could continue to be managed as it has historically, through the provision of a site-specific DCP in accordance with Clause 6.14 of MLEP 2013.

Option 4: Planning Proposal to allow additional uses under Schedule 1 Pursuant to Clause 2.5 of MLEP 2013.

The Planning Proposal as set out in this document is considered to be the best means of achieving the objectives and intended outcomes, giving both Council and the Proponent certainty of the development outcomes expected for the site.

The proposed LEP amendments will permit additional uses whilst maintaining the existing SP2 Health Services Facility zoning and providing the community with surety that this will remain the primary use of the site into the future. Both Council and the Proponent consider that relative to the B4 Mixed Use Zone objectives, the SP2 Health Services Facility zoning objectives better align with the intent to deliver a health and wellbeing precinct.

Furthermore, Option 4 will ensure that built form aspects of any future development continue to be appropriately managed through the provision of a site-specific DCP. The site specific DCP will provide detailed development controls for the land not limited to: building envelopes and built controls, traffic and parking controls, controls to manage the distinction between public and private spaces and indicative locations of proposed uses.

4.4 Section B – Relationship to Strategic Planning Framework

Q3. Is the Planning Proposal consistent with the objectives and actions within the applicable regional or sub-regional strategy (including the Metropolitan Strategy and exhibited draft strategies)?

A Guide to Preparing Planning Proposals sets out that in order to answer this question, a Planning Proposal needs to demonstrate consistency with the Strategic Merit Test. For the reasons set out below, the Planning Proposal is entirely consistent with the Strategic Merit Test and associated mandated assessment criteria.

a) Does the proposal have strategic merit?

Is it:

- Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or
- Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.

The Proposal demonstrates strategic merit in this regard as it will:

- Contribute to the renewal of an underutilised site to facilitate its emergence as a vibrant health and wellbeing precinct;
- Provide social infrastructure to meet the growing demand for a diversity of health care services;
- Support the growth of the Manly Strategic Centre by enhancing its existing social infrastructure and promoting its cultural, tourism and employment uses by delivering a range of secondary uses across the site.
- Preserve and repurpose the site's heritage significant buildings to provide a development outcome that is sympathetic to the locality's heritage, culture and historical identity;
- Foster the emergence of green links by promoting connectivity between the site and the surrounding national park;
- Increase the urban tree canopy coverage by delivering comprehensive landscaping;
- Not result in adverse environmental, social or economic impacts;
- Provide new employment opportunities in proximity to housing; and
- Foster the collaboration of governments, community and businesses.

Further discussion on the Planning Proposal's consistency with the relevant State and local strategic plans and policies is provided below.

Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan was released in March 2018. It provides a 40-year vision (to 2056) for the Greater Sydney Region and establishes a 20-year plan to manage growth and change for Greater Sydney. It identifies a vision for Greater Sydney to emerge as a metropolis of three cities comprising the Western Parkland City, the Central River City and the Eastern Harbour City.

The concept of three cities is predicated on the aspiration for its residents to live within 30-minutes of education, facilities, city-scale infrastructure and services and employment opportunities. To achieve this vision, the Greater Sydney Region Plan nominates 10 Directions centered around a framework based on the core themes of liveability, productivity and sustainability. These include:

1. A city supported by infrastructure
2. A collaborative city
3. A city for people
4. Housing the city
5. A city of great places
6. A well-connected city
7. Jobs and skills for the city
8. A city in its landscape
9. An efficient city
10. A resilient city

Each direction is supported by objectives and indicators that have been developed to guide the implementation of the plan. The overarching vision of the Greater Sydney Region Plan and its associated objectives are to be achieved through collaboration with all tiers of governments, the community, businesses and non-government organisations.

At a regional level, the Greater Sydney Region Plan recognises the need for infrastructure to be co-located in metropolitan and strategic centres. In light of this, the delivery of new facilities and infrastructure is noted as being integral to fostering the growth of socially connected communities as well as social and cultural networks that improve mental and physical health outcomes. To achieve this, strategic planning should aim to consider and capitalise on local identity, heritage, and cultural values.

The Greater Sydney Region Plan also identifies that there is a growing demand for community and health infrastructure due to shifting demographics, including the record number of births each year and the growing ageing population.

In light of the above, the Planning Proposal responds to the Greater Sydney Region Plan by giving consideration to its strategic directions and objectives. Specifically, the proposal is consistent with the nominated objectives as it will:

- Deliver health infrastructure that supports the growth of the Eastern Harbour City (Objective 1);
- Address the demand for health infrastructure arising from demographic shifts (Objective 3) (Objective 6);
- Foster collaboration between governments, community and business (Objective 5);
- Contribute to the creation of a healthy and socially connected community by providing social infrastructure and community focused uses (Objective 7);
- Optimise the opportunity to contribute to a culturally rich and diverse neighbourhood by protecting the site's heritage (Objective 8);

- Protect environmental heritage by adaptively reusing the site's heritage significant buildings (Objective 13);
- Increase employment opportunities in an accessible location (Objective 14);
- Provide a broader mix of uses that will support the operations of Australia's first AYAH and the growth of the Manly Strategic Centre, which ultimately will contribute to the competitiveness of the Harbour CBD (Objective 18);
- Balance the need to redevelop the site for a viable purpose alongside the requirement to protect its biodiversity and scenic landscape (Objective 27) (Objective 28); and
- Give consideration to the site's constraints and implement measures to mitigate potential exposure to natural hazards (Objective 37); and
- Adopt a coordinated and collaborative approach to redeveloping the site that balances the needs of Government and stakeholders (Objective 39).

North District Plan

The North District Plan is intended to guide the implementation of the Greater Sydney Region Plan at a district level, bridging regional and local planning by informing Local Environmental Plans and Planning Proposals.

In particular, the District Plan provides detailed planning priorities which integrate relevant objectives, strategies and actions in response to identified challenges and opportunities. The planning priorities relate to three key aims of the District Plan, being:

- A productive city;
- A liveable city; and
- A sustainable city.

The site forms part of the Manly Strategic Centre which is identified as being strategically important for its cultural, eco-tourism, retail and recreational offerings that benefit from the District's scenic and cultural landscapes, including North Head and Sydney Harbour National Park. The North District Plan identifies the need to protect its important biodiversity and habitat, whilst supporting tourism and access to its landscapes.

The North District is experiencing notable demographic changes which influence the demand for infrastructure, services and housing. Of the LGAs in the North District, Northern Beaches is expected to experience one of the largest increases in people aged 20-24 years (refer to **Figure 17**). This population segment is expected to increase by approximately 18% by 2036. In consequence the Northern Beaches LGA will accommodate a greater proportion of young adolescents relative to surrounding LGAs.

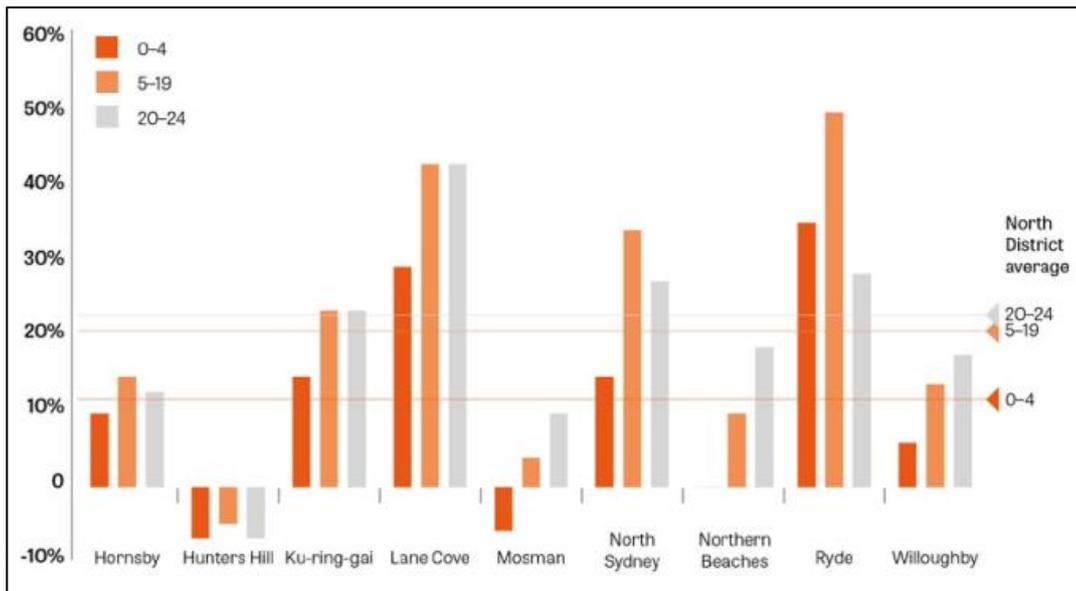


Figure 17 – Projected Population Change 2016-2036: 0-4, 5-19 and 20-24 Years

Source: North District Plan

The North District Plan prioritises the consideration of young people's needs in the design and management of open space, cultural spaces, public realm and future development more broadly. It aims to deliver on the directions of the Office of the NSW Advocate for Children and Young People's *Strategic Plan for Children and Young People* (the Strategic Plan).

The Strategic Plan represents one of the first legislated three-year whole-of-government plan focused on all children and young people aged 0 to 24 years. It aims to give children and young people opportunities to thrive, get the services they need and have their voice heard. The Strategic Plan is informed by extensive consultation with children and young people across NSW. Health care was identified to be one of five of the key issues raised. Key findings of relevance to the proposal are as follows:

- The need to improve access and increase funding for health and wellbeing services;
- Targeting health services to better treat and protect young people from intentional self-harm, psychosocial disorders and suicidal behaviour;
- Ensuring the provision of quality out-of-home-care services;
- Improving support and care for those with mental health problems; and
- Creating enabling and accessible environments for those with a disability.

As noted previously, the growth of the ageing population is another significant demographic trend affecting the North District. The North District is expected to see an 85% proportional increase in people aged 85 and over, and a 47% increase in the 65-84 age group by 2036. Of the LGAs across the North District, the Northern Beaches is anticipated to have one of the largest projected increases in the 65-84 age group (refer to **Figure 18**). In light of this, the North District Plan notes that more diverse housing types and medium density housing, as well as the design of walkable neighbourhoods, will create opportunities for older people to continue living in their community. In turn, the ageing population will benefit from being close to family, friends and established health and support networks that are integral to improving wellbeing.

The North District Plan identifies the need for additional health, social and aged care services to meet the growing demand for local aged care facilities and respite services.

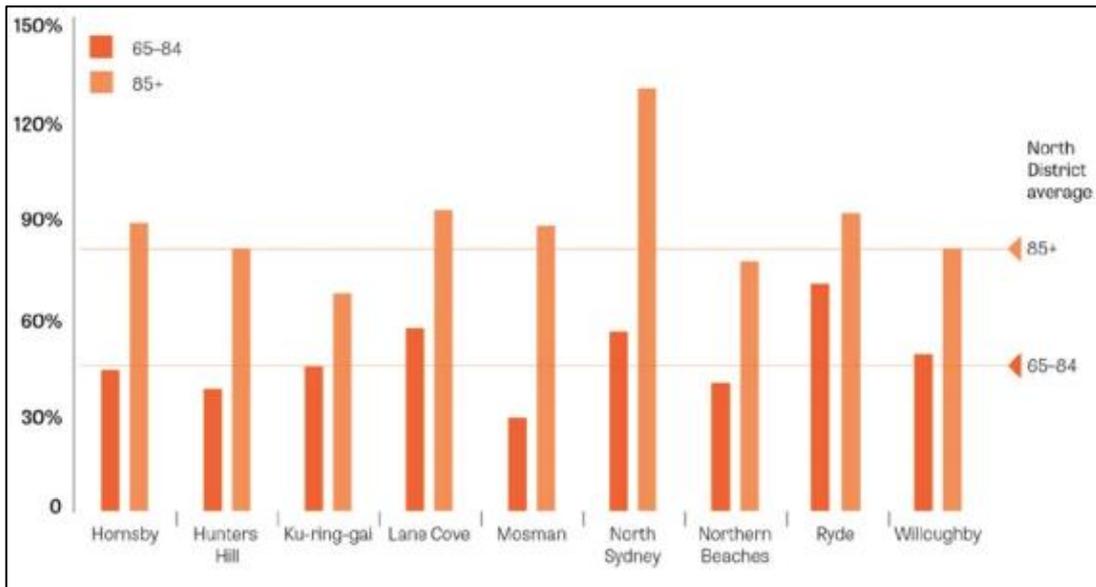


Figure 18 – Projected Population Change 2016-2036: 65-85 and 85 Years +
 Source: North District Plan

The North District Plan identifies that future development and infrastructure are to be planned at the local, district or metropolitan levels to meet the needs of Greater Sydney. New development is to prioritise a place-based planning approach whereby future development is to respond to a place's opportunities and constraints to maximise its full potential. Sympathetic built-form controls and the adaptive re-use of heritage items are also identified as being important to new redevelopment opportunities.

In light of the above, the proposal supports the North District Plan's priorities to create a more productive, liveable and sustainable city in that the proposal will:

- Provide a coordinated approach to the delivery of community and health infrastructure that aligns with the projected demand for hospice, health and wellbeing, and aged care uses (Planning Priority N1);
- Adopt a collaborative approach involving Council, government and the community to facilitate the provision and expansion of high-quality health infrastructure within the Northern Beaches LGA along with a broader range of ancillary community focused uses (Planning Priority N2);
- Provide services and social infrastructure that responds to people's changing needs, including the need for seniors housing resulting from the growing ageing population and additional health and well-being services for the growing proportion of young adolescents (Planning Priority N3);
- Contribute to the renewal of the site by delivering a high quality built form outcome that preserves its heritage buildings to allow for their ongoing appreciation and to assist with the preservation of the locality's character (Planning Priority N6);
- Whilst the proposal does not directly relate to a health and education precinct as defined by the North District Plan, it will facilitate the delivery of health/community infrastructure complementary to the nearby health precincts situated in Frenchs Forest and St Leonards (Planning Priority N9);

- Allow for an increased number of permissible uses that will facilitate employment creation within the Manly Strategic Centre and will contribute to the target of 817,000 jobs by 2056 (Planning Priority N10);
- Provide public domain areas with expansive views and pedestrian connections to North Head to encourage interaction with Sydney Harbour and the North District's waterways (Planning Priority N15);
- The proposal retains the portion of the site zoned E2 Environmental Conservation and will consequently protect important bushland and biodiversity (Planning Priority N16);
- The proposal will protect and enhance scenic and cultural landscapes by maintaining a number of historically significant buildings and providing architectural and urban design outcome that is sympathetic to the site's scenic qualities (Planning Priority N17);
- The proposal will contribute to the growth of the North District's urban tree canopy coverage by providing comprehensive landscaping, retaining as many trees as possible and conserving land with high environmental value (Planning Priority N19); and
- Deliver high quality open space areas that will benefit from access to views and the visual amenity afforded by the site's environmental setting (Planning Priority 20).

NSW State Plan 2021

The NSW State Plan 2021 sets the strategic direction and goals for the NSW Government across a broad range of services and infrastructure. The current focus of the Government is outlined in 12 Premier's priorities and 18 State priorities. The Planning Proposal supports the Premier's and aligns with the State priorities in that it will:

- Provide employment floor space facilitating jobs growth;
- Support new small businesses; and
- Create construction jobs.

NSW State Infrastructure Strategy 2018 - 2036

The NSW State Infrastructure Strategy 2018 – 2038 (the Strategy) sets out the NSW Government's infrastructure vision for the State over the next 20 years. The Strategy aligns with the Greater Sydney Region Plan.

The Strategy identifies that a key challenge for the Eastern Harbour City is to drive and accommodate growth and density alongside investment in infrastructure that optimises use of existing assets. It outlines a number of key infrastructure responses, including the need to invest in improvements in cultural infrastructure and tourism; support the population with social infrastructure investments; and provide more school education facilities.

The Planning Proposal aligns with the aspirations of the Strategy in that it will:

- Provide recreational, cultural and public open space facilities that will support the visitor economy;
- Deliver cultural and social infrastructure to meet contemporary expectations;
- Facilitate investment in education infrastructure to support development and industry growth; and
- Support the population with investment in social infrastructure, including residential care facilities, mental health services and health services.

Future Transport Strategy 2056

Future Transport 2056 establishes a 40 year vision for transport investment. It has been prepared in conjunction with the Greater Sydney Region Plan. It provides a framework for planning and investment to support the delivery of an innovative transport network that adapts to change and is customer focused. The future Transport 2056 nominates a number of key priorities. The following priorities are of relevance to the proposal:

- Activating centres with a new Movement and Place framework;
- Encouraging active travel (walking and cycling) and using public transport;
- Connecting people to jobs, goods and services in our cities and regions; and
- Supporting more environmentally sustainable travel.

The Planning Proposal is entirely consistent with the Future Transport Strategy 2056 in that it will facilitate the activation of an underutilised site that is easily accessible by public transport by providing a mix of uses. These uses will increase visitation to the site and foster community interaction. The proposed uses will co-locate jobs alongside goods and services in an accessible location.

The Indicative Master Plan that accompanies the Planning Proposal makes provision for pedestrian connections that will support more environmentally sustainable modes of travel such as walking and cycling. This will be further iterated through the future site-specific DCP prepared for the site.

NSW Ageing Strategy 2016 – 2020

The NSW Ageing Strategy 2016 – 2020 establishes the key priorities to address the needs of the ageing population across NSW. These priorities support the overarching vision for the NSW population to experience the benefits of living longer and having the opportunity to be included in their communities. The priorities and associated objectives are as follows:

- *Priority 1: Health and Wellbeing* – Older people in NSW are encouraged to live active and healthy lives with improved physical and mental wellbeing;
- *Priority 2: Working and Retiring* – Older people in NSW have opportunities to remain in the workforce, are financially secure and independent in retirement, and plan their finances based on their circumstances and needs;
- *Priority 3: Housing Choices* – Older people in NSW live in affordable accessible, adaptable and stable housing;
- *Priority 4: Getting Around* – Older people in NSW travel safely and appropriately to participate in social and economic life and access to services; and
- *Priority 5: Inclusive Communities* – Older people in NSW stay connected and contribute to their communities.

The Planning Proposal is consistent with the NSW Ageing Strategy 2016 – 2020 in that it will expand the range of permissible uses across the site to facilitate the provision of seniors housing in an accessible location. It will co-locate seniors housing with retail, health and recreational uses and in turn will reduce the need for residents to travel in order to participate in social activities and access needed services.

The proposal will facilitate the provision of recreational open areas and health facilities in a high quality urban environment. In turn, it provides the opportunity to improve physical and social wellbeing for occupants as well as the ageing population in the wider community.

b) Does the proposal have site specific merit?

Having regard to the following:

- The natural environment (including known significant environmental values, resources or hazards); and
- The existing uses, approved uses, and likely future uses of land in the vicinity of the proposal; and
- The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.

The Proposal demonstrates site-specific merit in this regard as it:

- Innovatively integrates a range of health care services and ancillary uses that will support the growing demand for health and social infrastructure;
- Will provide a built form outcome that is sympathetic to the site's heritage values;
- Will deliver a range of complementary uses that will attract visitors and encourage the people to explore the scenic landscape and tourism / cultural offerings in the surrounds;
- Will facilitate the creation of new employment opportunities in proximity to homes and services;
- Is located within an accessible and desirable location;
- Retains the site's primary historic use as a health care facility and is consistent with the objectives of the SP2 Health Services Facility zoning;
- Will provide an appropriate framework to ensure a desirable built form outcome is achieved that protects the site's scenic and landscape values as well as those of the surrounds.
- Will protect the site's biodiversity values by largely isolating future works to the existing developable portion of the site.
- Will achieve a high-quality landscaping outcome with linkages to promote connectivity to the surrounds to encourage people to interact with the locality's environmental and historic cultural assets;
- Will not result in unacceptable environmental impacts or compromise the amenity of surrounding residential properties;
- Is consistent with the desired future character of the locality as contemplated by the existing zoning provisions;
- Will facilitate the provision of seniors housing and health care facilities for adolescents in response to demographic shifts;
- Is compatible with the surrounding development, which provides comparable health facilities (i.e. Bear Cottage) and uses;
- Is appropriate for the site's location given its isolation from surrounding education and health care precincts; and
- Provides non-acute health services that will not undermine the competitiveness of nearby health and education precincts in areas such as Frenchs Forest.

Summary

This Planning Proposal achieves the assessment criteria as it demonstrates both strategic merit and site-specific merit. It is therefore considered that this Planning Proposal meets the Strategic Merit Test.

Q4. Is the Planning Proposal consistent with a Council's local strategy or other local strategic plan?

Towards 2040 – Northern Beaches LSPS

Towards 2040 is Northern Beaches Council's LSPS which was adopted by Council on 26 March 2020. Within the context of the LSPS, the site is situated within the Manly Strategic Centre, which is noted to accommodate the highest concentration of social infrastructure. The LSPS identifies Australia's first hospice for young adults as one of many specialist uses to be accommodated in Manly – which will be undertaken by NSW Health on the subject site.

The LSPS notes that future development and planned infrastructure are to respond to population growth and demographic changes. The Northern Beaches' population is projected to increase by around 39,000 people over the next 20 years. Of this projected growth, the LGA will accommodate a greater proportion of the ageing population relative to Greater Sydney.

Job creation is to occur concomitant with population growth. Consistent with the North District Plan, the LSPS envisages the LGA will accommodate around 9,000 to 13,000 additional jobs in its four strategic centres. As of 2016, 20% of the workforce were employed in health and education related jobs, which is projected to increase. Accordingly, health related uses are a key employment generator in the LGA.

The LSPS prioritises a place-based planning approach to preserve and enhance the LGA's local identity. Integral to this identity is its scenic and cultural landscapes, which are to be protected for the community's benefit. Place-based planning is to occur with community involvement where people are engaged in planning and decision-making.

The LSPS prioritises the need for a diversity of housing types to cater for different demographic groups, including the growing ageing population. The LSPS supports planning proposals for residential accommodation where strategic and site-specific merit are demonstrated and facilitate the delivery of a broader public benefit.

The Former Manly Hospital site is identified in the LSPS as a planning opportunity site, as shown in **Figure 20**. In particular, it identifies that there is a need to plan for the redevelopment of the site and its various uses. The site is to be redeveloped through a collaborative approach with local and State agencies to facilitate the realisation of shared outcomes.

The LSPS is supported by a range of planning priorities which aim to deliver on the directions of the Greater Sydney Region Plan and North District Plan. These planning priorities are underscored by a range of principles, with many directly applicable to the subject site.

The relevant Planning Priorities and associated principles are as follows:

- Priority 3 – Protected scenic and cultural landscapes.

- Protect core areas and areas of high environmental value from urban development.
- Priority 9 – Infrastructure delivered with employment and housing growth.
 - Collaborate across levels of government to integrate land use and infrastructure.
- Priority 11 – Community Facilities and services that meet changing community needs.
 - Facilitate transparent collaboration process and involve stakeholders and the community early.
 - Provide flexible diverse and multi-use places and spaces close to public transport and strategic and local centres.
- Priority 17 – Centres and neighbourhoods designed to reflect local character, lifestyle and demographic changes.
 - Renew great places through design excellence and innovation design while respecting and enhancing local character.
 - Enhance local identity through place-based planning and design
 - Recognise heritage and culture as a fundamental aspect of the identity of place, including identification of places and items which contribute to the significant character of a place.
- Priority 26 – Manly as Sydney's premier seaside destination.
 - Balance competing land uses in Manly to serve the needs of workers, residents and visitors.
 - Protect and enhance Manly's character, identity and social significance.
 - Improve links to North Head and the former Manly Hospital site.

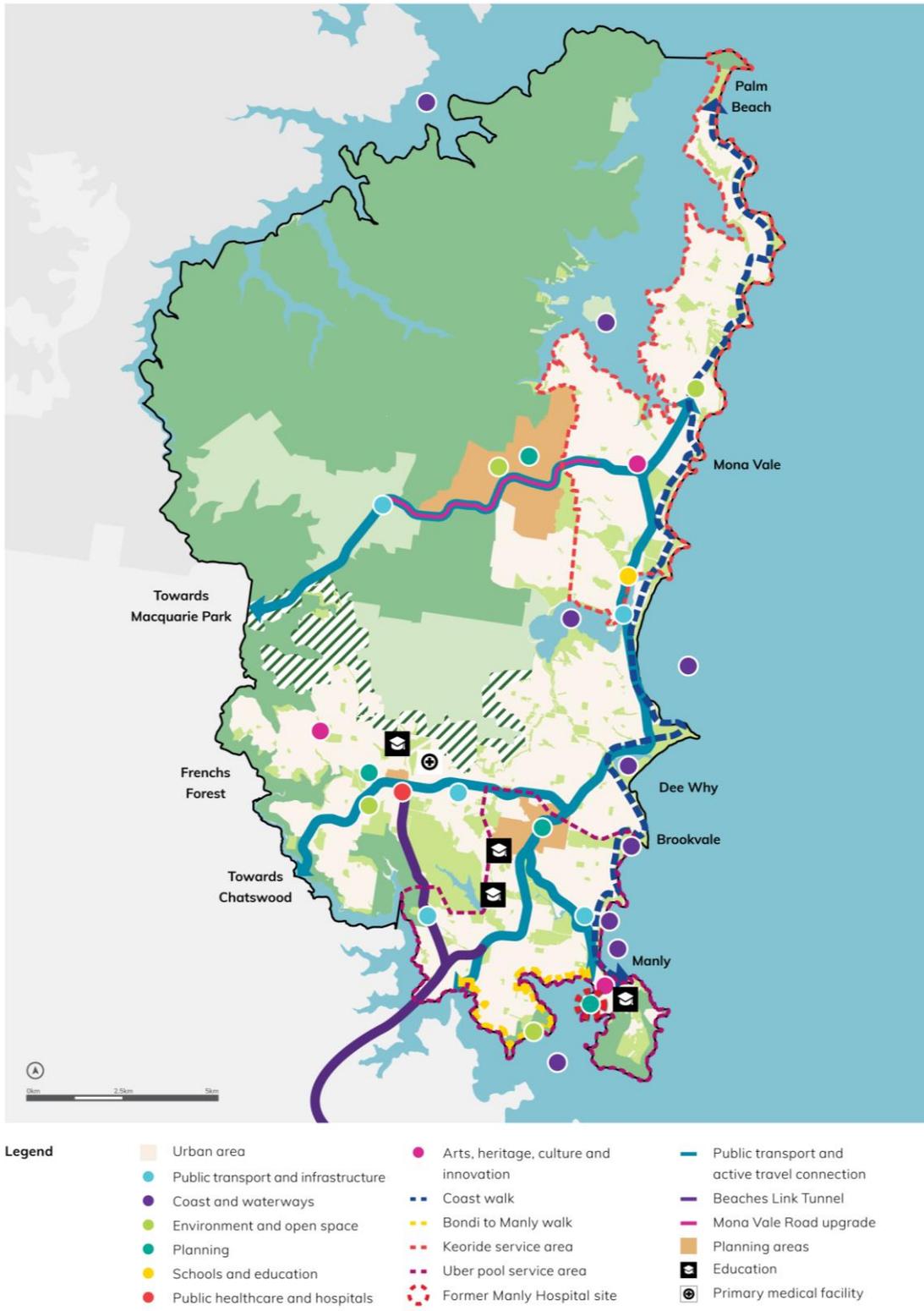


Figure 19 – Northern Beaches Collaboration Projects

Source: *Towards 2040 - Northern Beaches LSPS*

The Planning Proposal supports the aforementioned Planning Priorities and Principles, for the following reasons:

- Through collaboration with the local and State government, the proposal will facilitate a planning framework that will allow for the delivery of social and

health infrastructure, tertiary education, seniors living, residential care facilities and services that will address the changing needs of the community, including those of the ageing and younger populations;

- The proposal will maintain and protect the site's environmental values by preserving the areas containing high environmental values and largely limiting the site's redevelopment to the land zoned SP2 Health Services;
- The proposal will redevelop the site for a multifunctional purpose, providing a health and well-being focused precinct close to transport and a local centre that will accommodate a greater range of compatible uses to that currently permitted;
- The proposal will contribute to the renewal of an underutilised site by delivering a built form outcome that exhibits design excellence;
- The redevelopment of the site will adopt a place-based approach, conserving its local identity and social significance through the adaptive reuse of its historically important heritage buildings;
- The proposal accommodates a range of competing land uses that will address the needs of the community whilst facilitating the creation of local employment opportunities; and
- The proposal incorporates linkages to North Head that will foster connectivity.

Shape 2028 – Northern Beaches Community Strategic Plan 2018-2028

Shape 2028 – Northern Beaches Community Strategic Plan 2018 -2028 (the CSP) was adopted 17 April 2020 and is Northern Beaches Council's first CSP. It defines the community's long-term vision, priorities and strategic direction for the Northern Beaches LGA.

The CSP prescribes an overarching vision which is for Northern Beaches to be:

'a safe, inclusive and connected community that lives in balance with our extraordinary coastal and bushland environment'.

To support this vision, the CSP nominates a framework that includes a range of goals. The proposal's consistency with the relevant goals is outlined in the table below.

Table 4. Consistency with Shape 2028 – Northern Beaches CSP 2018-2020		
Goal		Comments
1	Our bushland, coast and waterways are protected to ensure safe and sustainable use for present and future generations.	The proposal predominantly relates to land that has been redeveloped for urban purposes. Consequently, the planning proposal will not impact the biodiversity values associated with the portion of the site zoned E2 Environmental Conservation.
5	Our built environment is developed in line with best practice sustainability principles.	The proposal has the capacity to adopt best practice sustainability principles. Sustainability measures and commitment will be addressed further through the development of a site-specific DCP and Detailed development application at a later date.

Table 4. Consistency with Shape 2028 – Northern Beaches CSP 2018-2020

7	Our urban planning reflects the unique character of our villages and natural environment and is responsive to the evolving needs of our community.	The proposal adopts a place-based approach to the site's redevelopment. The proposal will enable the delivery of a range of community uses that will address the evolving needs of the community.
8	Our neighbourhoods inspire social interaction, inclusion and support health and wellbeing.	The planning proposal relates to the delivery of a health and well-being precinct. The planning proposal will enable the delivery of uses which will foster social interaction and supported the health and well-being needs of the community.
14	Our economy provides opportunities that match the skills and needs of the population.	The proposal seeks to broaden the permissible uses on the site. The uses proposed to be permitted at the site are employment generating uses that will cater to a diversity of people within the community, including the growing health care sector, which is forecast to be one of the fastest growing sectors in the LGA.

Q5. Is the Planning Proposal consistent with the applicable State and environmental planning policies?

The Planning Proposal would address and/or be consistent with all relevant Environmental Planning Policies (SEPPs). The following outlines the intent of the relevant SEPPs and consistency of the Planning Proposal.

Table 5. State Environmental Planning Policies

SEPP	Consistent	Comments
SEPP No 1 – Development Standards	NA	Not applicable pursuant to clause 1.9 of the MLEP 2013.
SEPP (Building Sustainability Index: BASIX) 2004		Will be addressed at the Development Application Phase if required.
SEPP (Coastal Management) 2018	Yes	The site contains areas of littoral rainforest; however, these portions of the site will not be impacted by future development as identified in the Ecological Constraints Assessment in Appendix 5. Compliance with the SEPP will be addressed at the site-specific DCP and Development Application Phase.

SEPP (Concurrences) 2018	NA	
SEPP (Educational Establishments and Child Care Facilities) 2017	NA	
SEPP (Exempt and Complying Development Codes) 2008	NA	Not relevant to the proposed LEP amendment. The SEPP may be relevant at the Development Application Phase.
SEPP (Infrastructure) 2007	Consistent	This SEPP is relevant to particular development categories. This Planning Proposal does not derogate or alter the application of the SEPP to future development. The full requirements of the SEPP will be considered at the detailed development application phase once the full design parameters of the proposal are known.
SEPP (Koala Habitat Protection) 2019	NA	Pursuant to Schedule 1 of the SEPP, the site is not located within a koala management area.
SEPP (Mining, Petroleum Production and Extractive Industries) 2007	NA	
SEPP (Miscellaneous Consent Provisions) 2007	NA	
SEPP (Housing for Seniors or People with a Disability) 2004	Yes	The delivery of seniors housing across the site is permissible with consent pursuant to Clause 4(1)(a)(iv) of the SEPP.
SEPP (Primary Production and Rural Development) 2019	NA	
SEPP (Vegetation in Non-Rural Areas) 2017	Consistent	Future development of the site will require minimal vegetation planning as the majority of development will be contained within areas of the site comprising existing built form. Notwithstanding, the full details of necessary

		vegetation clearing will be confirmed at later DCP and DA planning stages of the development process.
SEPP No 19 – Bushland in Urban Areas	Consistent	This Planning Proposal does not derogate or alter the application of the SEPP to future development.
SEPP No 21 – Caravan Parks	NA	
SEPP No 33 – Hazardous and Offensive Development	NA	
SEPP No 36 – Manufactured Home Estates	NA	
SEPP No 50 – Canal Estate Development	NA	
SEPP No 50 – Remediation of Land	NA	
SEPP No 64 – Advertising and Signage	NA	Not relevant to the proposed LEP amendment. May be relevant at the Development Application Phase.
SEPP No 65 – Design Quality of Residential Apartment Development	NA	Residential apartment development will not be undertaken at the site.
SEPP No 70 – Affordable Housing (Revised Schemes)	Consistent	The proposal does not inhibit operations of the former Part 3A provisions or the replacement measures.
SEPP (Affordable Rental Housing) 2009	NA	Not relevant to the proposed LEP amendment. The proposal does not seek consent for affordable housing.
Sydney Regional Environmental Plan (Sydney Harbour)	Consistent	The site is located within the bounds of the Sydney Harbour Catchment REP. The site is zoned W2 Environmental Protection. The LEP amendment is consistent with the relevant zoning objectives. Specifically, the site relates to the redevelopment of urbanized land and is located a considerable distance from the foreshore. Accordingly, the proposal will have no impact on the environmental and

Catchment) 2005		<p>cultural values of waters in the zone and adjoins foreshores. The site relates</p> <p>The site is located within the 'Foreshore and Waterways Area'. With reference to the relevant matters of consideration nominated under Division 2, supporting subconsultant reports confirm that:</p> <ul style="list-style-type: none"> • The proposal will have no impact to biodiversity, ecology and environmental protection. • The scenic quality of foreshores and waterways; • The proposal will have no impact to views to and from Sydney Harbour.
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Q6. Is the Planning Proposal consistent with applicable Ministerial Directions (S.9.1 Directions)?

The Planning Proposal is consistent with all relevant section 9.1 Directions. The assessment of these is outlined in the table below.

Table 6. Section 9.1 Ministerial Directions					
Clause	Direction	Yes	No	NA	Comments
1 Employment and Resources					
1.1	Business and Industrial Zones			✓	
1.2	Rural Zones			✓	
1.3	Mining, Petroleum Production & Extractive Industries			✓	
1.4	Oyster Aquaculture			✓	
1.5	Rural Lands			✓	
2 Environment and Heritage					
2.1	Environmental Protection Zones	✓			The planning proposal will primarily support redevelopment of portions of the site that contain little vegetation and have been subject to land clearing previously. Further discussion is provided in 4.5 of the planning proposal report.
2.2	Coastal Protection	✓			The site is not identified as being within a coastal vulnerability area or on land within a coastal wetland as defined by the SEPP (Coastal Management) 2018.

Table 6. Section 9.1 Ministerial Directions

Clause	Direction	Yes	No	NA	Comments
					<p>The site is however mapped as containing littoral rainforest. Notwithstanding, as addressed in the Ecological Constraints Assessment at Appendix 5 only the far southern portion of the site contains littoral rainforest of high ecological value. This area will not be impacted by future redevelopment activities.</p> <p>Littoral rainforest located within other parts of the site is in poor condition and relates only to select remnant species. The area is dominated by exotic vegetation and has experienced historical clearing.</p> <p>The site relates to land that is impacted by a coastal hazard, with this identified by the MLEP 2013 as being landslide risk. However, the proposal does not seek to rezone the site. It also does not seek to enable increased development or a more intensive land-use. Specifically, the proposed health and wellbeing precinct represents a less intensive land use relative to the site's former hospital operations.</p> <p>In accordance with Direction 2.2(8)(a), the Ecological Constraints Assessment, the proposed redevelopment of the site is suitable. Further, as demonstrated throughout this report and consistent with Direction 2.2(8)(b), the proposal is entirely consistent with the applicable strategic plans.</p>
2.3	Heritage Conservation	✓			
2.4	Recreation Vehicle Areas			✓	
3 Housing, Infrastructure and Urban Development					
3.1	Residential Zones	✓			<p>The proposed additional uses relate to residential accommodation primarily in the form of seniors housing and temporary accommodation for patients and their families. The proposal will provide the site with the ability to address the growing</p>

Table 6. Section 9.1 Ministerial Directions

Clause	Direction	Yes	No	NA	Comments
					demand for seniors housing due to demographic changes.
3.2	Caravan Parks and Manufactured Home Estates			✓	
3.3	Home Occupations			✓	
3.4	Integrating Land Use and Transport	✓			The proposal is adequately serviced by public transport consisting of bus services that service the site from Darley Road. It will therefore increase the supply of jobs in a location well serviced by public transport. The traffic generation associated with the proposal is significantly less than that associated with its former hospital use. Further discussion is provided in 4.5 and Appendix 6.
3.5	Development near Licensed Aerodromes			✓	
3.6	Shooting ranges			✓	
4 Hazard and Risk					
4.1	Acid Sulfate Soils				The MLEP 2013 does not identify the site as containing acid sulfate soils.
4.2	Mine Subsidence and Unstable Land			✓	
4.3	Flood Prone Land			✓	The site is not identified by Council's Flood Risk Precinct Maps as being affected by flooding.
4.4	Planning for Bushfire Protection	✓			The site is not identified on Council's Bushfire Prone Land mapping. Notwithstanding, the Bushfire Assessment Report prepared by Peterson Bushfire at Appendix 7, designates the site as being of 'medium' bushfire risk. It confirms that the site can be suitably redeveloped subject to the adoption of the

Table 6. Section 9.1 Ministerial Directions

Clause	Direction	Yes	No	NA	Comments
					recommendations, including the provision of compliant APZ.
5 Regional Planning					
5.2	Sydney Drinking Water Catchments			✓	
5.3	Farmland of State and Regional Significance on the NSW Far North Coast			✓	
5.4	Commercial and Retail Development along the Pacific Highway, North Coast			✓	
5.9	North West Rail Link Corridor Strategy			✓	
5.10	Implementation of Regional Plans	✓			This Planning Proposal is consistent with the Regional and District Plan.
5.11	Development of Aboriginal Land Council land			✓	
6 Local Plan Making					
6.1	Approval and Referral Requirements			✓	No new concurrence provisions are required.
6.2	Reserving Land for Public Purposes			✓	No new road reservation is proposed.
6.3	Site Specific Provisions	✓			The proposal will not introduce any site specific planning controls that are unduly restrictive.

Table 6. Section 9.1 Ministerial Directions

Clause	Direction	Yes	No	NA	Comments
7. Metropolitan Planning					
7.1	Implementation of A Plan for Growing Sydney	✓			The Planning Proposal is entirely consistent with the Greater Sydney Region Plan for the reasons set out in Section 4.4 of the planning proposal report.
7.2	Implementation of Greater Macarthur Land Release Investigation			✓	
7.3	Parramatta Road Corridor Urban Transformation Strategy			✓	
7.4	Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan			✓	
7.5	Implementation of Greater Parramatta Priority Growth Area Interim Land Use and infrastructure Implementation Plan			✓	
7.6	Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	
7.7	Implementation of Glenfield to Macarthur Urban Renewal Corridor			✓	

Table 6. Section 9.1 Ministerial Directions					
Clause	Direction	Yes	No	NA	Comments
7.8	Implementation of Western Sydney Aerotropolis Interim Land Use and Infrastructure Implementation Plan			✓	
7.9	Implementation of Bayside West Precincts 2036 Plan			✓	
7.10	Implementation of Planning Principles for the Cooks Cove Precinct			✓	

4.5 Section C - Environmental, Social and Economic Impacts

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The Planning Proposal will not impact critical habitat or threatened species, populations, or ecological communities, or other habitats as assessed in the Ecological Constraints Assessment undertaken by Narla Environmental provided in Appendix 5 of the planning proposal report.

The report provides an assessment of the biodiversity constraints affecting the site and the implications for the proposal. The report notes the following:

- Littoral rainforest contained within the site is primarily in poor condition, dominated by weeds and has already experienced clearing;
- The proposal occupies land that has already been subject to redevelopment and is therefore unlikely to have an adverse impact on threatened species, populations, or communities; and
- Impacts to vegetation may arise from the establishment of the APZs required to address bushfire risk; however, a Vegetation Management Plan will be implemented to guide the removal of exotic vegetation.

In summary, the report concludes that the site can accommodate redevelopment activities associated with the health and wellbeing precinct envisions providing areas mapped as being highly constrained are avoided. In addition, the report identifies that due to the site's location, a Biodiversity Development Assessment Report and

entry into a Biodiversity Offset Scheme will be required. These requirements will be addressed at the detailed Development Application phase once precise details of vegetation removal can be confirmed.

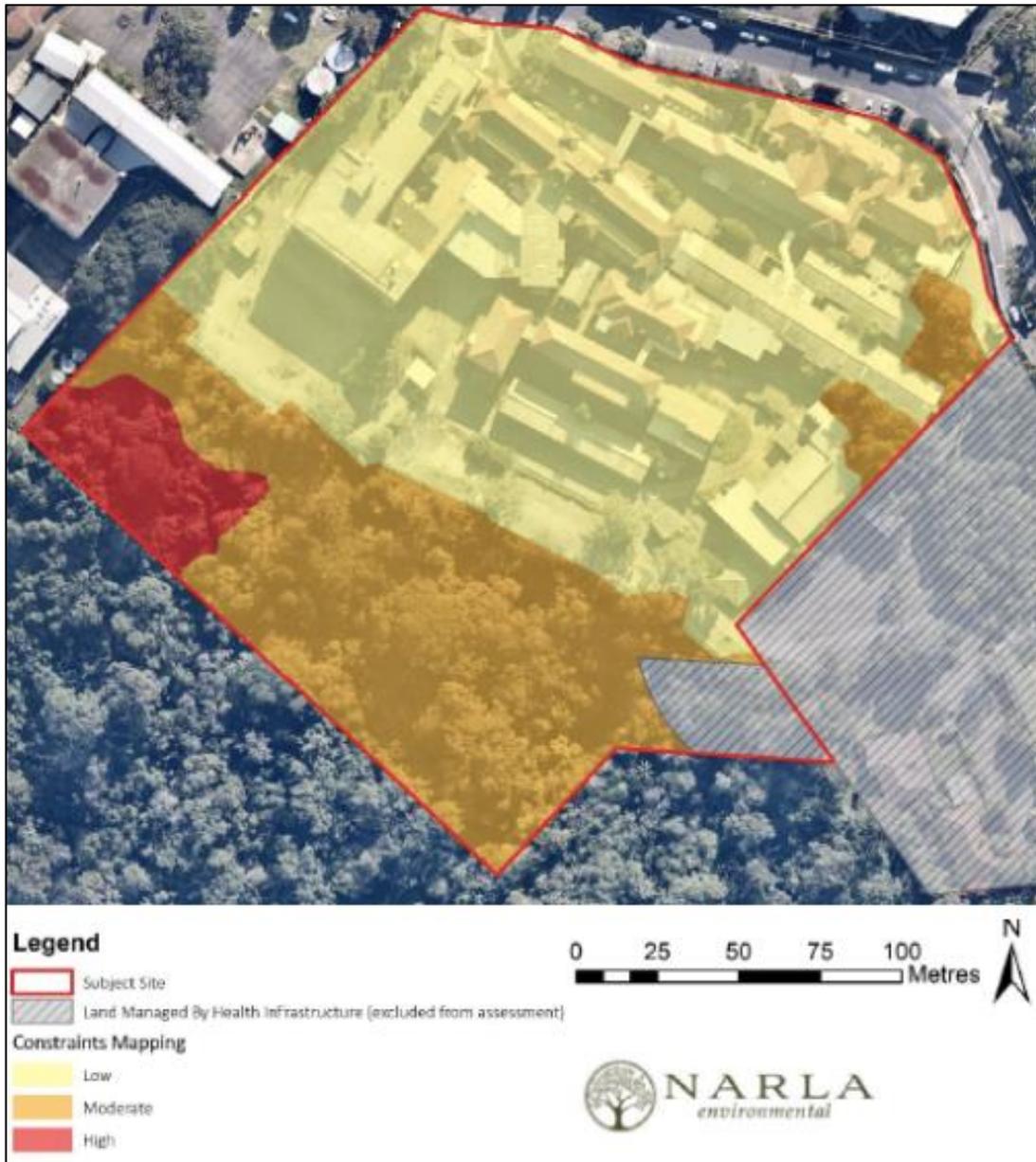


Figure 20 – Constraints Mapping Across the Subject Site showing low constraint areas in yellow
Source: Narla Environmental

Q8. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

Bulk and Scale

A site-specific Development Control Plan (DCP) will be prepared for the site and provided detailed development control plans for future development. In accordance with Clause 6.14 of MLEP 2013, the development control plan will provide the following:

- (a) principles drawn from an analysis of the site and its context,
- (b) building envelopes and built form controls,
- (c) subdivision pattern,
- (d) distinct public and private spaces,
- (e) overall transport hierarchy showing the major circulation routes and connections to achieve a simple and safe movement system for private vehicles, with particular regard to public transport, pedestrians and cyclists,
- (f) preferred location of permissible uses,
- (g) traffic management facilities and necessary parking ratios,
- (h) staging of development.

The DCP for the site will be developed in close consultation with the PSAC, the community and Council and ensure that an appropriate development response is achieved at the site. The built form controls introduced to the site will be commensurate to the scale of existing development located on the land and respond appropriately to surrounding context of the locality.

The site-specific DCP will be informed by further environmental investigations, urban design analysis and landscaping strategy. In addition, it is also intended to be prepared in parallel with a Conservation Management Plan (CMP), which will also assist in informing detailed controls for the site's redevelopment.

Transport and Access

A Preliminary Transport Assessment has been prepared by JMT Consulting and is included at Appendix 6 with key findings provided below.

Traffic Generation Impacts

JMT Consulting have prepared an assessment of the traffic volumes in the surrounding road network to assist in understanding the traffic generation impact associated with a proposal commensurate to that which is envisioned for the site.

Traffic counts were undertaken in December 2019. The counts reveal that traffic volumes along Darley Road were below 300 vehicles per hour in one direction across any typical day. As the typical capacity of a traffic lane is 900 vehicles per hour, the results confirm that Darley Road has ample capacity to support additional traffic generation that may arise from the proposed future redevelopment of the site.

The traffic generation assessment has been prepared in accordance with the *RMS Guide to Traffic Generating Development*. Accordingly, the following traffic generation rates have been adopted for the assessment:

- *Health and Wellbeing Uses*: 0.5 traffic movements / parking;
- *Seniors Housing*: 0.1 traffic movements / dwellings

Based on the rates noted above, redevelopment of the site will generate less than 100 vehicle movements in the peak hour period. In light of the traffic count findings, the surrounding road network has sufficient capacity to support the traffic generation associated with the development. Further, as the intensity of land use sought by the proposal is relatively less compared to the site's former hospital, JMT Consulting

confirm that the anticipated traffic generation will be comparatively less than what has historically emanated from the site and its former hospital operations.

Public Transport Capacity

JMT Consulting have prepared an assessment of the surrounding public transport infrastructure and its capacity to support the proposal. The report confirms that the existing transport infrastructure in the locality has the capacity to support the proposal without the need for further upgrades. It recommends however that bus routes to and from the site be increased to foster the use of public transport and reduce the reliance on private vehicles.

The report identifies that the redevelopment of the site presents an opportunity to encourage public transport usage. It recommends that the future development make provision for green travel plans, car pooling arrangements for staff, and bicycle parking / end-of-trip facilities. These measures can readily be addressed at the Development Application stage and adopted during the occupation phase.

Stormwater Management

A Stormwater Strategy Report has been prepared by Arcadis and is included at Appendix 9. The report provides an assessment of the proposed stormwater strategy and the water sensitive urban design measures proposed for the site.

The stormwater infrastructure for the site will consist of an expanded pit and pipe system. The existing drainage network within the site will be replaced and/or expanded. Vegetated swales and castellated kerbs will be installed to manage runoff. Internal roadways will also be upgraded to ensure that stormwater can be conveyed downstream and to avoid potential inundation of the site. The proposal will seek to retain the existing trunk drainage pipeline that traverses the site to prevent impacts to the surrounding drainage infrastructure.

Consideration has been given to the inclusion on on-site detention. Arcadis have determined that the on-site detention is not necessary given that the proposal does not seek to increase the extent of impervious areas across the site. On-site detention may be required in the instance overland flow paths increase across the site notwithstanding the proposed stormwater infrastructure upgrades. The report notes that future hydraulic modeling will be required to determine the need for on-site detention at the detailed design phase.

Water sensitive urban design measures will be incorporated in accordance with Council's requirements. These measures consist of gross pollutant traps, tree pits, vegetated swales, castellated kerbs and bioretention basins. In addition, rainwater harvesting will be adopted to eliminate the need for water quality treatments and to reduce the demand for potable water demand. The implementation of these measures will improve stormwater quality discharge and promote water efficiency for the future development.

Bushfire Considerations

A Bushfire Assessment Report has been prepared by Peterson Bushfire and is included at Appendix 7. The report provides an assessment of the bushfire hazard and risk and nominates protection measures.

The report notes that the site is categorised as being of 'medium' bushfire risk. The risk rating has been determined in consideration of the site's proximity to bushland within the Sydney Harbour National Park. As shown in Figure 21 the site is surrounded by Vegetation Category 1 to the south and east, which represents the most hazardous type of vegetation. It also contains Category 2 Vegetation.

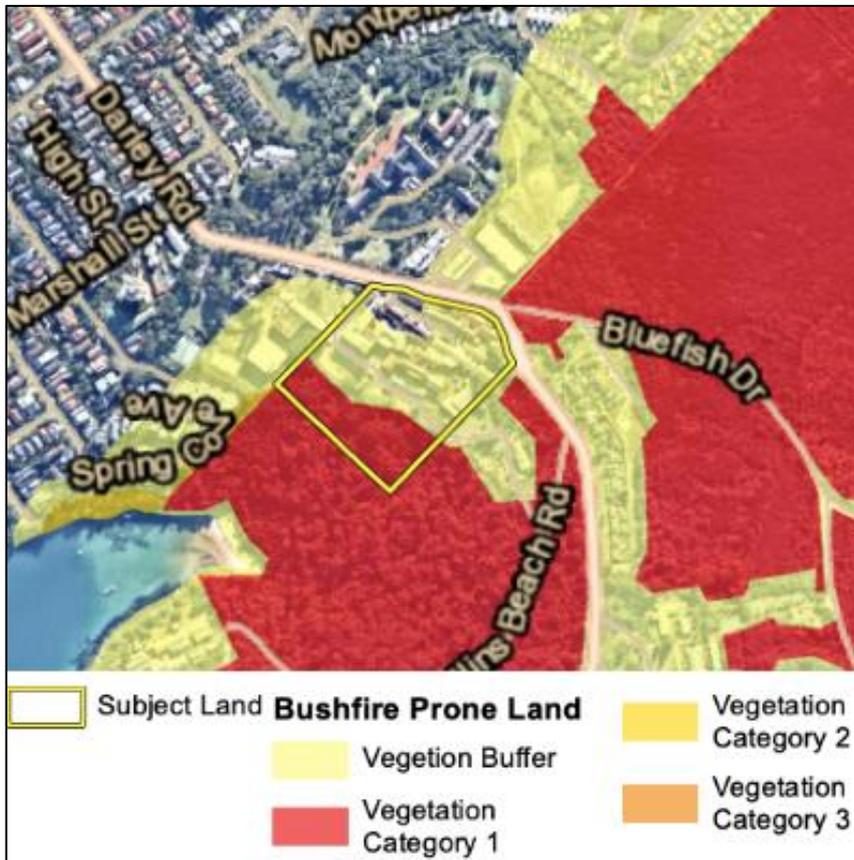


Figure 21 – Location of Bushfire Prone Land
Source: Peterson Bushfire

This hazard rating is not anticipated to change in the post development phase due to the introduction of the proposed additional uses. Accordingly, the risk to occupants will also remain unchanged.

The report nominates the following mitigation measures to ensure adequate bushfire protection and compliance with the requirements of *Planning for Bush Fire Protection 2019*:

- Provision of compliant APZs between future building envelopes and bushfire hazards;
- Provision of BAL mapping to guide compliant building construction;
- Adequate access for emergency response and evacuation;
- Compliant road widths and design;
- Perimeter road between buildings and bushfire hazards;
- Adequate water supply to facilitate fire-fighting operations; and

- Appropriate vegetation management within the APZ and landscaping across the site.

The site historically has not incorporated the aforementioned measures. Therefore, the proposal provides the opportunity to improve compliance with the bushfire protection requirements in the future.

Asset Protection Zones

The proposed APZs comply with the requirements of *Planning for Bush Fire Protection 2019* and will consequently ensure new buildings are not exposed to intolerable heat impacts. The proposed APZs are shown in the figure below.

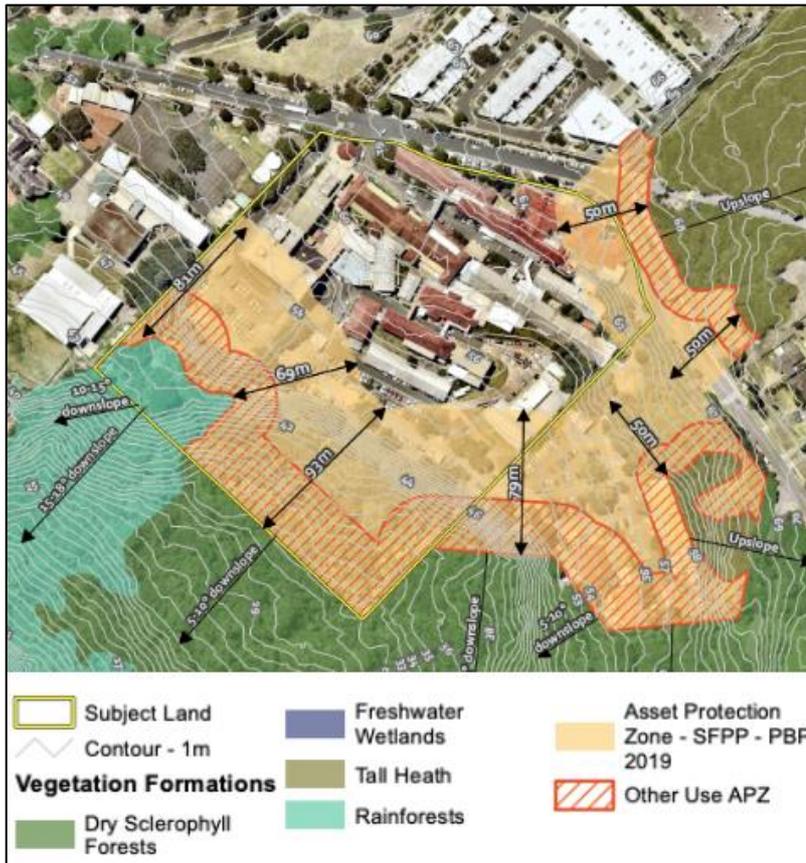


Figure 22 – Location of Proposed Asset Protection Zones
Source: Peterson Bushfire

The APZs will set the buildings back further from the bushfire hazard areas and will be routinely maintained in accordance with the detailed Vegetation Management Plan that accompanies the report (refer to *Appendix 7*).

With these measures in place, the report concludes that the proposal can be accommodated on the site without exposing future occupants to bushfire risk.

Geotechnical

JK Geotechnics have prepared a Geotechnical Investigation which is included at *Appendix 8*. The investigation provides an assessment of the subsurface conditions and proposes recommendations to facilitate the demolition and construction phase.

The investigation confirms that excavation to a depth of 2m is required along with the importation of fill. With the anticipated depth of excavation required, it is not anticipated that ground water will be encountered.

Based on the site's conditions and the proposed scope of works, the report proposes the following recommendations:

- The preparation of detailed dilapidation reports for the heritage buildings contained within the site that may be impacted by excavation or associated vibration impacts;
- Additional borehole investigations should be carried out once the detailed design is finalized;
- A stability assessment should be prepared to assess the risk to surrounding areas; and
- New structures should be founded on underlying sandstone bedrock.

Subject to the adoption of the above recommendations, JK Geotechnics confirm that the site can be made suitable for the proposed development as sought by this Planning Proposal and a future Development Application. Consistent with the conclusions of the report, the geotechnical recommendations will be reviewed following the finalisation of the detailed design.

Q9. Has the Planning Proposal adequately addressed any social and economic impacts?

Social Impact

Ethos Urban have prepared a Community Needs Analysis and Social Strategy which is included at Appendix 2. The purpose of the report is twofold; to firstly assess the social and health infrastructure needs of the community and secondly to determine whether the future health and well-being precinct will generate a demand for additional social infrastructure.

The methodology employed to prepare the Community Needs Analysis consisted of community profiling; a review of existing social infrastructure in the LGA; an assessment of the applicable strategic policies applying to the site; and the outcomes of consultation activities undertaken to date, including the results of Ernst and Young's market sounding.

The findings of the report lend support to the amendments proposed by this Planning Proposal and sufficiently justify the need for the proposed additional land uses. In summary, the findings of the assessment conclude that there is a growing need for expanded health and social infrastructure in the locality, including specialised mental health, community health services and complementary uses (i.e. recreational, educational, retail etc.) that will differentiate the health precinct from existing acute health services in the LGA. Collectively, these uses will facilitate the delivery of a destinational health precinct that services patients, visitors and the wider community.

Social Context and Existing Infrastructure

In determining the uses suitable for the site, Ethos Urban have prepared a Social Context Study that identifies the demographic trends affecting the LGA and the existing social and health infrastructure in the locality. The key findings are as follows:

- The Northern Beaches LGA has a greater ageing population relative to that of Greater Sydney, with a higher median age and higher share of residents aged over 60 years;
- The site is not identified as suitable for accommodating a community facility given that Council's vision is to concentrate community facilities within the core of the town centre to realise the benefits associated with the co-location of similar community facilities (e.g. library, cultural and creative facility and local community facilities).
- It is projected that across the LGA, there will be a shortfall of publicly accessible open space areas over the next 20 years and in consequence there is an identified need for flexible and multifunctional open space areas;
- The site is dislocated from the Manly Town Centre and nearby strategic health and education precincts, with the latter already providing or designated by strategic plans to provide acute health services; and
- There is a need for social infrastructure that caters to the ageing population who require specialist health and well-being services that are not provided by nearby acute health service facilities.

The conclusions of the Social Context analysis confirm that due to the site's locational attributes and the existing supply of health infrastructure in the LGA, the site is better suited to support non-acute health and well-being uses, including specialised mental health and community health services. In accommodating these uses, there is an opportunity for the site to operate as a destinational health and wellbeing precinct that caters to the local community as well as visitors in the broader surrounds.

The site's redevelopment as a destinational health and well being precinct is also supported by the community consultation outcome findings and market sounding undertaken on behalf of the proponent.

Demand for Social Infrastructure

Ethos Urban confirm that the proposal will generate a demand for additional social infrastructure. The report notes that the redevelopment of the site will result in an increase of 273 workers, 228 residents and 370 tertiary students. Combined, the proposed uses along with the increased number of occupants across the site will increase the demand for social infrastructure in the form of open space necessary for respite, physical activity and social interaction.

Economic Impact

The Planning Proposal will create a number of positive economic outcomes, including:

- Enable the site to be redeveloped for non-acute health purposes and facilitate additional jobs in the Eastern Harbour Facility in the health sector and other industries;
- Support competitiveness and job growth by increasing the number of permissible employment generating uses across the site which will facilitate the generation of 273 jobs;
- Facilitate additional jobs through construction activities associated with the future redevelopment of the site;
- Will deliver employment generating floorspace along with much needed health and social infrastructure in response to the needs of the community.

Heritage

Aboriginal Heritage

An Aboriginal Archeological Due Diligence Assessment has been prepared by Dominic Steele Consulting Archaeology and is included at Appendix 4. The purpose of the report is to assess the archeological significance of the site and the implications for the proposal.

The report has been completed in consultation with the Metropolitan Local Aboriginal Land Council (MLALC) and in accordance with the *Office of Environments & Heritage's (OEH) Due Diligence Code of Practice (2010)* guidelines. The findings of the report are informed by a site inspection where extensive field recording was undertaken to ascertain areas of Aboriginal archeological sensitivity. A sample survey of the southern and eastern bush land areas and photographic recordings were relied upon to complete the field recording.

The report concludes that no Aboriginal Archaeological sites or objectives have previously been recorded on the site. It notes that the bush land located on the perimeter of the site, within its south and south eastern portions, has the potential to contain archaeological remnants. These remnants may be within sandstone surfaces and buried soils. The remainder of the site has been subject to extensive redevelopment to facilitate the construction of the former hospital. In turn, the former sandstone and associated soil profiles that have the potential to contain Aboriginal rock engravings, deposits and objects are likely to have been destroyed or significantly disturbed. Notwithstanding, the proposal does not seek to redevelop these areas, with the future built form confined to the already redeveloped portions of the site. Accordingly, these sensitive areas are not likely to be impacted by the proposal.

Based on the findings of the field recording, the report provides the following recommendations to facilitate the redevelopment of the site:

- That a geotechnical investigation of subsurface conditions beneath the existing car park and landscaped surfaces be undertaken to identify if intact sandstone and soils are present. If found, appropriate heritage management approaches should be adopted.
- Where the future redevelopment of the site necessitates disturbance to the bush land areas located at the fringes of the site, the proposed works must be evaluated at a site-specific level by the MLALC to identify if there will be any potential Aboriginal cultural heritage impacts.

European Heritage

Paul Davies Pty Ltd have prepared a Heritage Assessment Report which is included at Appendix 3. The report assesses the heritage significance of the buildings contained within the site and the potential impacts to the European heritage values.

The assessment has been prepared in accordance with the guidelines of the *NSW Heritage Manual* and The NSW Heritage Division, Office of Environment and Heritage's (OEH) *Assessing Heritage Significant* guidelines as well as the principles established by the Australian ICOMOS Burra Charter and associated Practice Notes.

While the report identifies that the site contains only one locally listed heritage building known as (Item I133 – the Manly District Hospital (former principal building)) there are a number of unlisted buildings contained within the site that are of local historical significance. These buildings are significant as they are representative of inter-war period hospital designs and reflect their original built form dated back to 1920s-1930s.

Buildings 5 and 15, and the remnant façade of Building 1, are of significance as they are representative of Inter-war Georgian Revival and Inter-war Free Classical style buildings. They reflect the work of the NSW Government Architect's branch and the typical hospital designs of the Inter-war period. Building 20 is of heritage significance due to its historical associations with the Quarantine Station. The assessment concludes that these buildings are capable of being adaptively reused.

The remaining buildings across the site are identified as being of moderate significance or detracting items that are not worthy of retention.



Figure 23 – Location of Heritage Significant Buildings
 Source: Paul Davies Pty Ltd

Based on the preceding assessment, the report nominates two recommendations. Firstly, that the buildings discussed above that are identified as having heritage significance be retained, conserved and adaptively reused. In accordance with this recommendation, the Indicative Concept Master Plan for the site demonstrates how this may be able to occur (refer to Appendix 1).

The second recommendation relates to the preparation of a Conservation Management Plan to guide the redevelopment of the site and the proposed adaptive reuse of the existing buildings. To satisfy this recommendation, it envisaged that a Conservation Management Plan will be prepared at the site-specific DCP or detailed Development Application preparation stage of the project.

In summary, the assessment confirms that the site contains a variety of significant heritage buildings and whilst not designated as being locally listed heritage items under the MLEP 2013, some of these buildings are worthy of retention and adaptive reuse. With the adoption of the recommendations, the proposal as envisaged by the Indicative Concept Master Plan can be accommodated on the site without providing unacceptable impacts to its significant heritage fabric. Consistent with the report's recommendations, the proposal will adaptively reuse these significant buildings in a manner that preserves the site's important aesthetic qualities and historical associations.

4.6 Section D – State and Commonwealth Interests

10. Is there adequate public infrastructure for the Planning Proposal

The site is located in an established urban area and benefits from access to a range of existing facilities and services, including utilities, with capacity to service additional envelope. See the accompanying Services Strategy undertaken by Cardno provide as Appendix 1 for further details.

The site is located in close proximity to a number of public transport services, including bus services along Darley Road opposite the site which provide connections to the Manly Town Centre and the Northern Beaches. The site is located a short 13 minute walk (800m) from the Manly Town Centre, which provides additional public transport connections to the Sydney CBD, North Sydney CBD and Chatswood.

11. What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?

The Planning Proposal has been prepared on behalf of Property & Development NSW (PDNSW), part of the Department of Planning, Industry and Environment. The requested LEP amendments reflect both State agencies' visions for the redevelopment of the site. In addition, NSW Health also have been consulted with extensively in relation to the project through the PSAC.

The views of other State and Commonwealth public authorities will be further known once consultation has occurred in accordance with the Gateway determination of the Planning Proposal. Given the nature of the Planning Proposal, it is not anticipated that referral to any State or Commonwealth agency would be required.

Where necessary, further consultation with relevant authorities will be undertaken as required at the Gateway Determination Phase. State and Commonwealth authorities will have the opportunity to provide comment on the Planning Proposal as part of its formal exhibition.

5 Part 4 – Mapping

The proposed amendments do not necessitate changes to the mapping that accompanies the MLEP 2013. Rather, the Planning Proposal will introduce additional permitted uses under Schedule 1 pursuant to clause 2.5 of the MLEP 2013.

6 Part 5 – Community Consultation

The Planning Proposal will be placed on public exhibition in accordance with the Gateway Determination, should Council and DIPE support the planning proposal. Confirmation of the public exhibition period and requirements for consultation will be detailed as part of the Gateway Determination.

Any further Community consultation will be conducted in accordance with Sections 56 and 57 of the EP&A Act and *A Guide to Preparing Planning Proposals*. This is likely to involve notification of the proposal:

- Advertisement of the project in a local newspaper which is circulated within the LGA;
- Notification letters to relevant State Agencies and other authorities nominated by the DIPE;
- Notification (via letter) to land holders of properties within and adjoining the future health precinct;
- Exhibition of the Planning Proposal on Council's website and at the Customer Service Centre; and
- Undertaking of any other consultation methods appropriate for the proposal.

Any future site-specific DCP and detailed design DA for the site would also be exhibited in accordance with Council's requirements, at which point the public and any authorities would have further opportunity to comment on the Planning Proposal.

To date, community consultation via multiple engagement platforms has been undertaken by the Proponent for the purpose of determining the uses suitable for the site and in order to receive feedback on the draft concept masterplan.

Consultation was conducted over a four-week period from 2 August to 2 September 2019 and in Q3 of 2020. A variety of consultation methods were employed, including online mapping via Social Pinpoint, Manly Daily print advertisement, newscorp digital advertisement and Facebook advertisements. Additionally, two, three-hour face to face information drop-in sessions were held with stakeholders and the community.

With respect to the site's future uses, the findings from the community consultation confirmed strong support for:

- The delivery of the AYAH and the inclusion of complementary uses for visitors and residents;
- The retention and adaptive reuse of the site's existing heritage buildings;
- The protection of the site's ecological and biodiversity values;
- The provision of community focused uses rather than private uses;
- The retention of the site's use as a health care facility to maintain the community's access to health services; and
- A future development that capitalises on the site's locational attributes, including its environmental landscape setting and access to views.

7 Part 6 – Project Timeline

A primary goal of the plan making process is to reduce the overall time taken to gazette LEPs. The Gateway determining will confirm the level of information necessary to support a Planning Proposal and the consultation requirements. In order to meet this goal, the inclusion of a project timeline with the Planning Proposal will provide a mechanism to monitor the progress of the Planning Proposal through the plan making process.

The table below provides the project timeline anticipated for the subject Planning Proposal, which is proportionate to the nature and scale of the Planning Proposal.

Table 7. Project Timeline	
Milestone	Date
Submission of the Planning Proposal	November 2020
Planning Proposal Reported to Council	February 2020
Referral to Minister for Gateway Determination	February 2020
Anticipated commencement date (date of Gateway determination)	February/March 2020/2021
Commencement and completion dates for public exhibition period	March/April 2021
Timeframe for government agency consultation (pre and post exhibition as required by Gateway determination)	June/July 2021
Timeframe for consideration of submissions	July/August 2021
Timeframe for consideration of a proposal post exhibition	August/September 2021
Consideration of PP by Council (Council Meeting)	October 2021
Date of submission to the DPIE to finalise the LEP	October/November 2021
Anticipated date RPA will make the plan (if delegated) or Anticipated date RPA will forward to the department for notification	November 2021
Anticipated date for publishing of the plan	December 2021

8 Conclusion

This Planning Proposal has been prepared in accordance with:

- Section 3.33 of the EP&A Act 1979; and
- The DPIE's *A Guide to Preparing Planning Proposals (2016)*.

The Planning Proposal pertains to land described as 150 Darley Road, Manly and provides a comprehensive justification for the proposed amendments to the MLEP 2013 which include expanding the range of permitted uses under Schedule 1 of MLEP 2013 at the site, whilst maintaining the primary role of the site as a health services facility. Pursuant to clause 2.5 of MLEP 2013 the planning proposal seeks to introduce additional permitted uses at the site including the following: a group home, community facility, educational establishment, food and drink premises, centre-based child care facility, indoor recreational facility, neighbourhood shop, function centre, respite day care centre and seniors housing.

The Proposed amendments to the MLEP 2013 are intended to facilitate the development of the site for the purpose of a state-of-the art health and well-being precinct whilst retaining its primary purpose as a health services facility.

It is considered that the Proposal:

- Is consistent with the aims and objectives of relevant strategic plans and policies, including the Greater Sydney Region Plan, the North District Plan, the LSPS, the Northern Beaches CSP, the NSW Ageing Strategy 206 – 2020, Future Transport 2056 and the NSW State Plan 2011.
- Is consistent with the relevant statutory plans and policies, including the aims of the MLEP 2013;
- Demonstrates consistency with the Site Specific Merit Test and Strategic Merit Test;
- Will result in no adverse environmental, social or economic impacts; and
- Will deliver employment generating floorspace along with much needed health and social infrastructure in response to the needs of the community.

Given the strategic planning merit of the proposed amendments, we request that Council forward this Planning Proposal to the Minister for Planning for 'Gateway Determination' in accordance with Section 3.34 of the EP&A Act 1979.



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