

23 June 2025

Mr Stephen Dobbs  
Planning Officer  
Social and Infrastructure Assessments  
Department of Planning, Industry & Environment

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Our Ref: 2025/407049

Dear Mr Dobbs

**Detailed Further Council Submission Comments - SSD-71378958 - Uniting Belrose Seniors Housing - 2B Morgan Road, Belrose**

Thank you for the opportunity for Northern Beaches Council to provide detailed supplementary comments as per Council's outline submission, dated 4 June 2025.

As previously stated, primary concerns relate to ensuring that the subject proposal, as a Category 2 development, is appropriately consistent with the *Warringah Local Environmental Plan 2000* (WLEP 2000). This requires particular outcomes pursuant to the *B2 Oxford Falls Valley Locality Desired Future Character* (DFC) statement, built form controls and *General Principles of Development Control* under WLEP 2000.

The WLEP 2000 has its own embedded requirements for *housing for older people or people with disabilities*, generally applied via clauses 12, 14A, 18, 20, 29, 40 and Schedule 16. Applicable development controls within Part 4 of the WLEP 2000 must also be considered and as well those relevant under Schedules 5, 10, and 17. For your consideration Council is concerned about the proposal achieving the DFC including a 'low intensity, low impact' form of development given the height non-compliances, massed building forms and very high density. Detailed issues are also raised in the Appendix 1 attachment to the letter regarding urban design & internal facility layout, traffic safety and parking demand, stormwater engineering, water runoff, bushfire threat, landscaping and open space design.

Please find attached further details as per Council's concerns outlined in its initial submission letter. Should you require any further information or assistance in this matter, please contact my office on 8495 6414.

Yours faithfully



Louise Kerr  
Director Planning & Place

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**WARRINGAH LOCAL ENVIRONMENTAL PLAN 2000 (WLEP 2000)**

The subject development is a Category Two land use under WLEP 2000 and therefore the Department (as consent authority) must have regard to the provisions of Clause 14A (4) of WLEP 2000. The matters for the consent authority to be satisfied with under clause 14A (4) require the development application to be consistent with:

**“14A - How is existing Category One or Category Two development dealt with?”**

*(4) Despite clauses 12 (2) (b) and (3) and 20 (1) and (3), the consent authority may consent to the carrying out of development to which this clause applies, but only if the consent authority is satisfied that the development—*

*(a) is of minor environmental impact, and*

*(b) does not, to any significant extent, alter the bulk, size or scale of any existing building or existing land use, and*

*(c) results in an improvement to the existing character of the locality in which it occurs, and*

*(d) is confined to the current lot (or lots) on which the existing Category One development or existing Category Two development is being carried out.”*

Concern is raised that the proposal, due to significant intensity of use, height variations across various ILU buildings, tree removal and likely high parking and traffic generation that the Uniting Wesley Gardens Belrose Redevelopment (UWGBR) cannot be concluded to be consistent with clause 14A (4) (a) or (b) or (c). While the renewal of housing for residential aged care (RAC) and new independent living units (ILU's) is encouraged for the UWGBR there are number of Desired Future Character (DFC) inconsistencies, built form non-compliances and associated impacts that Council raises concerns over. The Department of Planning (“the Department”) should be concerned about these matters when evaluating the development against those critical parts of the WLEP 2000, especially given that the UWGBR is such a large Category 2 proposal.

**Height, Bulk and Scale**

The significant height variations for the ILU buildings (namely Building's B, D and E) create an unfavourable precedent against the DFC and are unrepresentative of “low intensity, low impact” in the *Oxford Falls Vally Locality*. The height and magnitude of the variance across the floor plates and additional building bulk is much more than the comparative examples

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used against 'Glenaeon Village'. Concern is also raised that using such a comparative approach of past precedent sets an "ever increasing" justification for future development in the Locality for greater variations to the built form controls. The test under 'Clause 20' follows on from Clause 12 and the mechanism of clause 20(1). This mechanism seeks that:

- the resulting development is consistent with the *general principles of development control*,
- the *desired future character of the locality*, and
- any relevant *State environmental planning policy*.

It is noted that references are commonly made to other developments in an area as a matter of precedent in describing comparative examples in context. However, this is not one of the 'tests' under clause 20 to justify variations to the built form controls. For this reason, such variations are not considered to pass the test of clause 14A (4)(c) to be "*an improvement to the existing character*". If the non-compliance is considered acceptable it would potentially trigger other future development to follow suit in a 'domino effect' against the WLEP 2000 controls. Such variations would be better justified if they were less than or equal to, "other" variations, rather than being more numerous and larger variations to the same / similar type of development.

The Department should note that provided certain 'embedded facilities' within the complex such as the gym/café/pool and the like *if not* operated to serve or advertised to outside clientele / external customers then the proposal can be categorised, as a whole, as Category 2. If these community site facilities will intentionally operate to also service external customers, then such uses as per the "Land Use" categories, must also be assessed using 'Category Three' procedures. In this regard, it is noted that the applicants EIS has identified the following under its contributions payment commitment:

*"Uniting is exempted from section 7.11 contributions on the basis that they are a community housing provider as defined in the Housing SEPP and pursuant to the Ministers 94E directions. Notwithstanding, it is understood that Uniting will be required to pay Regional Infrastructure Contributions. Uniting intends on paying development contributions to Council relating to the proposed seniors gymnasium."*

This suggests that the gymnasium, if retained as proposed, will be a Category 3 use and that use must follow the procedures prescribed by Clause 15 and 16 of the WLEP 2000.

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**Clause 12 of the Warringah Local Environmental Plan 2000**

**“12 - What matters are considered before consent is granted?**

*(1) Before granting consent for development the consent authority must be satisfied that the development is consistent with—*

*(a) any relevant general principles of development control in Part 4, and*

*(b) any relevant State environmental planning policy described in Schedule 5 (State policies).*

*(2) Before granting consent for development, the consent authority must be satisfied that the development will comply with—*

*(a) the relevant requirements made by Parts 2 and 3, and*

*(b) development standards for the development set out in the Locality Statement for the locality in which the development will be carried out.*

*(3) In addition, before granting consent for development classified as—*

*(a) Category One, the consent authority must consider the desired future character described in the relevant Locality Statement, or*

*(b) Category Two or Three, the consent authority must be satisfied that the development is consistent with the desired future character described in the relevant Locality Statement, but nothing in a description of desired future character creates a prohibition on the carrying out of development.”*

The WLEP 2000 intentionally sets out how development in these categories “will be controlled” and notes are included in the WLEP 2000 that Category 2 development “*may*” be consistent with the DFC. As such, Category 2 development is subject to more rigorous assessment than a Category 1 land use, and hence also against the built form development standards, clause 20 and the General Principles being applied with due regard to achieving “consistency”.

**Low Intensity, Low Impact**

In the Department considering the UWGBR, the proposal makes regular references to the “Glenaeon” development which is some distance from the proposal and not readily visible

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from the site. An analysis of the Glenaeon development shows the non-compliant elements were generally of a much lesser magnitude and often small incursions, such as the corner of a roof, top of lift overrun and the like. Across the non-compliant height elements, these numerical variations were, on average, very minor and did not involve any significant elements of any storeys within the new buildings at Gleaneon.

In the case of UWGBR, significant elements of an entire storey breach the building height plane and are dedicated to ILU floors. Council considers that the height breaches are excessive for a Category 2 development and the proposal has added extra habitable storeys knowing that these breaches are well above the maximum height plane. As a category 2 development this is immediately symptomatic of overdevelopment and does not demonstrate “minor” environmental impact or “low intensity, low impact”. Furthermore, the increased bulk, size and scale for residential uplift above the height control and cannot be regarded as consistent with Clause 14A (4) (a), (b) or (c). It should be noted that the DFC begins with *“The present character of the Oxford Falls Valley locality will remain unchanged”* which suggests a conservative approach to redevelopment and compliant design response to the built form controls (or at least very minimal non-compliance) for Category 2 uses. Variations for steeply sloping land may be considered as per the DFC which allows height to be measured only within the building footprint only. In addressing “low intensity, low impact” matters the Department should refer to *Vigor Master Pty Ltd v Northern Beaches Council [2020] NSWLEC 1671* [para 48-55], *Vigor Master Pty Ltd v Warringah Council [2022] NSWLEC 1558* [para 32-38] and *Vigor Master P/L v Warringah Council [NSWLEC 1128]* [para 17, 33 and 34] which provide insight in dealing with new development pursuant to WLEP 2000 within the non-urban localities.

### **Building height**

Overall, the height breach of Building “B” and “E” should be commensurate with Building “D”. That is, once the upper storey horizontal floor plate reaches a point where it meets or begins to breach the height plane, the building profile should drop to the next lower-level floor plate, below the height plane again. No objection is raised to the roof terrace at RL172.0 on building ‘E’, however, this should include operable weather protection and BBQ space / wet bar facilities and the like to enable a versatile space for residents and their families.

### **Visitation and Intensity of Use**

Residential Aged Care (RAC) facilities can have significant family related visitor parking demand (such as public holidays weekends, Mother’s Day / Father’s day, Easter and

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Christmas and New Year). These family visits are often for extended periods during the day. The proposal should address mechanisms for managing peak / overflow parking on such days to the RAC, especially if the site also has other concurrent uses operating. Alternatively, the occupancy capacity may be reduced to better align with the 'low intensity, low impact' requirement of the DFC and avoid any potential off-site impact on Morgan Road or Oates Place.

There appears to be a significant lack of parking and there is likely to be displacement (external parking impacts) outside the site along Morgan Road and Oates Place. The open area car park, accessed from Oates Place should be increased by at least 50% (e.g. another 25-30 visitor parking spots) which may be asphalt or stabilised grass. A light-weight pedestrian rain shelter at the northern end of the Oates Place outdoor carpark is recommended for this access point for use during inclement weather where residents / visitors if walking to or from this car park, as a pick-up / drop-off point, can pause during inclement weather.

In some circumstances ILU facilities would commonly also attract residents that have RV's, caravan / trailers or the like. It should be clarified if such other vehicles will be permitted to be held on site by ILU residents, and if so, an additional informal parking area accessed off "Oates Place" carpark be allocated for these as part of the overall parking capacity.

### **Category 2 and Category 3 Uses**

The proposal includes a gymnasium that is indicated to allow external 'seniors only' customers to visit. However, as a 'recreation facility' that includes external clientele this would introduce a "Category 3" Use and therefore cannot be approved without an Independent Public Hearing into the proposal with recommendations of the independent hearing to be considered by the consent authority prior to determination.

### **Residential Aged Care (RAC)**

The RAC does not appear to have a sensory garden area or general gardening (hobby) for its occupants to assist their quality of life. Additionally, while many of the RAC rooms have balcony spaces, these may be unsuitable as shown due to the swing doors (especially for wheelchair / walker frame) and the usability of such balconies in inclement weather (wind / rain). In this regard some of the RAC communal rooms should be versatile as 'winter room' style alfresco spaces that less mobile occupants can safely use.

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The RAC bedrooms appear to have very limited wardrobe and drawer space including shelves and space for personal effects. Space for chairs (family visitors) and personal effects are important for the quality-of-life memories and mental health for elderly and family members to give a feeling of family and connection to their life-long memory experiences. Furniture such as bed side cabinets, cupboard handles, “low-boy” drawers and the like should not have sharp corners where RAC residents can easily be hurt by if they lose balance or brush against furniture edges / handles if they have impaired mobility. While this is not an urban design, or an architectural detail required the department may include this consideration in the public interest as part of conditions or by way of annotation for the construction and fit-out as per Schedule 16 of WLEP 2000 and to be “*of good design*”.

**Ambulance or Paramedic / Transport Services**

It is noted that the RAC appears to have capability for a mix of high-care and mid-care accommodation styles. If ambulance paramedics are assisting RAC residents to get to hospital for an appointment or responding to an urgent care callout it is normal for ambulances to use the main foyer entry and not drive into a basement area. Basement ambulance spaces are normally used for circumstances where higher privacy or discrete transfer is needed. The porte-cochere at the RAC should be expanded to allow 2 vehicles (an ambulance and a visiting car) to remain or pass, with reasonable weather protection from the awning. Additionally, the open view Porte-cochere area from the multi-function hall (meeting space) should ensure appropriate screening / landscape screening of the porte-cochere from the meeting hall so that persons are not in full view of being “loaded / unloaded” in an ambulance or a family car.

**URBAN DESIGN (Core area)**

The design analysis and review documents indicate a pedestrianised core “active centre” where ILU residents (and perhaps RAC residents) with their families / visiting friends can enjoy the outdoor spaces and communal facilities. However, the “spine” of the complex and the “heart” space (central core facilities) are divided by a 2-lane internal road that connects to 3 basements, pick-up drop-off areas and visitor parking. Much of the open space areas are divided by internal roadways and sloping pathway structures and stairs. Wholistically, the layout of the ‘community’ facilities / communal rooms and the like are disconnected from the majority of ILU buildings and the ground floor apartments. The complex layout also results in the middle of the facility (Building C) being surrounded by shared open spaces so occupants may feel a compromised sense of privacy or may feel intruded upon at ground level. It is

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considered that the ground floor (RL170.3) of Building C may be better dedicated or appropriately designed as the “hub” as a form of town centre and contain the cinema, “family function” room, a ladies lounge with salon, an arts/crafts / music space, library / reading room, bar/café with a “club” room and a TV/games area, including communal kitchen / BBQ / private dining room and that some of these rooms could also achieve some ocean views by increasing the gap between Building B and Building E. Main access points should include some at grade covered space for mobility scooters as well as a light weight semi covered connection across to the RAC. Additionally, for Building C the lower level (at RL167.1) would be suitable for the pool facilities and gym, wellness centre and light exercise rooms to be located so that they also open out to the adjacent lawns and thus create a central community “hub” to the entire facility, while being semi-screened by the landscape surrounds between the outer ILU buildings.

### **Outdoor Pathway connections**

The extensive outdoor pathway areas should include covered ‘refuge’ points mid-way between the main buildings for weather protection in inclement weather. These may take the form of a covered seating ‘rest’ bench spaced along the accessible pathways, such as where 2 paths intersect and there are long gradients before reaching the next building.

### **OPEN SPACE AND LANDSCAPE DESIGN**

The Oxford Falls Valley Locality Statement and Clause 63 Landscaped open space within the WLEP 2000 are commonly in conflict with “*Planning for Bushfire Protection*” requirements and Fire Safety Authority conditions applied by the NSW Rural Fire Service. It is uncertain from the development application details if a lot more of the existing interlocking canopy will need to be removed if the NSW RFS requires the site to be managed as an inner protection area (IPA) and outer protection area (OPA). If this is the case, the proposal cannot be regarded as “low impact” against the DFC, including Clause 14A and the additional tree canopy removal would not be considered as “minor environmental impact” in terms of “Category 2”. Namely in that it cannot meet the DFC requirement that “*vegetation will be protected and, where possible, enhanced*” or ensure that the “*dense bushland buffer will be retained or established along Forest Way.*”

### **Landscape Setting**

The 20m dense landscape buffer requirement under WLEP 2000 B2 Oxford Falls Valley Locality Statement is encroached by the existing driveway/carparking that is indicated for



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reconstruction in the same location; however, the opportunity is available to relocate the proposed Building 'A' further east to achieve a 20m wide front landscaped setback along Forest Way.

A small portion at the south-west of the land satisfies the 20m front setback requirement with minor encroachment of structures, being the setback for the existing detached dwelling house. The remainder and majority of the Forest Way front setback at Building A does not provide a sufficient landscaped setback. It is noted the frontage of Building A falls outside the APZ and BAL requirements outlined in Figures 5 and 6 of the Bushfire Report, and as such establishing a landscaped setting is possible in this location.

The secondary road frontage along Morgan Road can achieve the requirement for a 10m wide landscape buffer, where this zone shall be free of structures, roadworks / car parking.

Landscaped open space currently achieves 30%, noting the Draft Northern Beaches DCP increases this to 45%.

### **Landscape Visual Assessment**

The Visual Assessment does not properly provide for the visual impact of the proposal, and the existing vegetation along Forest Way is visually permeable such that the proposed development will be visually exposed and proposed tree removal will further reduce any vegetation screening, as permeable as it currently exists.

Based on the Survey information provided, the ridgeline of the existing building in the vicinity of proposed Building A is at RL178.75. Building A is indicated in Sections as having a roof height facing Forest Way of between RL185.25 to RL181.90. As the existing building is visually apparent from Forest Way, Building A, and possibly Building B, will present a considerably larger visual impact along Forest Way that is not mitigated by the development.

The Desired Future Character requirement for a dense buffer to Forest Way is not apparent in the application and the application fails to adequately indicate the visual impact of the proposal.

### **Impact to Existing Trees and Vegetation**

The proposed tree removal within Council land along Forest Way is not supported nor is it justified.

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All existing trees within the road reserve shall be retained and any proposed structures shall be wholly contained within the legal property boundaries, except for a pathway to establish a connection to the bus stop. The existing pathway alignment to the bus stop shall be utilised to ensure no impact to street trees occurs.

Establishing a landscaped setback fronting 'Building A' will allow the retention of street trees.

**STORMWATER ENGINEERING**

It is recommended to the Department that the stormwater management concept plan for the re development of the United Care village demonstrate the following:

- The post stormwater developed stormwater flows are to be limited to the pre-developed state of nature flows up to the 1/100 AEP storm event as required by Councils water management for development policy. This means that the state of nature conditions are to be 0% impervious and assume forest conditions.
- The design of the on-site storm water detention system and site drainage is to be based on ARR 2019. Climate change considerations are to be used in the design of the on-site storm water detention system and site drainage system in accordance with ARR 2019 chapter 4.2.
- The OSD dam structure is shown against the vertical contours, rather than along and in sympathy with the natural contour that would cause less excavation and allow the dam wall structure to be compliant with the eastern setback (rather than encroach the setback area).

**WATER QUALITY & CATCHMENT MANAGEMENT**

**Consistency with NSW Government and Council Policy and Strategy**

The proposed development is generally consistent with the objectives and principles of Council's strategic planning and policy documents for water quality including:

- Warringah Local Environment Plan 2000 (refer to Clauses 60 - Development is to be sited and designed to maintain and enhance natural watercourses and aquatic habitat.)
- *Northern Beaches Community Strategic Plan* (refer to Protection of the Environment: Goal 1 – Our bushland, coast and waterways are protected for their intrinsic value.)

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- Northern Beaches Local Strategic Planning Statement (refer to Priority 1, Healthy and valued coast and waterways)
- Northern Beaches - Environment and Climate Change Strategy (refer to Theme 2, *Waterways and Catchments*)
- Northern Beaches Council's Protection of Waterways and Riparian Land Policy (Council is committed to managing, protecting and restoring waterways and riparian land)

**Council's Riparian Policy Detailed Requirements**

The planning proposal appears to have considered Council's Protection of Waterways and Riparian Land Policy. Council is committed to managing, protecting and restoring waterways and riparian land in a manner that:

- allows them to function as natural systems where possible,
- considers risk from instability, erosion and flooding, and
- is consistent with Council's planning controls and guidelines as well as NSW and Australian legislation and guidelines.

The Policy also states that natural ecological processes of waterways and riparian land shall be maintained and enhanced, bushfire asset protection zones shall be maintained outside of riparian land, and public access should be located outside riparian zones where possible except for crossing points or other strategic locations.

The Policy recommends that development within waterways and riparian land be avoided. Where a waterway has not yet been identified on Council's Waterways and Riparian Land Map, the riparian land widths are to be applied from relevant State guidelines.

The site forms part of the headwaters of Snake Creek catchment, flowing into Narrabeen Lagoon via Middle Creek. Narrabeen Lagoon is a high conservation value asset with primary aquatic habitats (natural and modified), migratory routes, landscape qualities, and recognise recreational importance.

It is recommended to the Department that the proposed stormwater management is to develop articulation between the disposal of treated stormwater runoff and the downstream creek system. The proposed outlet is to be connected to the downstream flow path and water dependant ecosystem

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**Water Quality Management**

The submitted Stormwater Management Plan states it complies with Council's Water Management for Development Policy.

The main principles are as follow:

- Improve the quality of water discharged to our natural areas to protect the ecological and recreational condition of our, beaches, waterways, riparian areas and bushland.
- Minimise the risk to public health and safety.
- Reduce the risk to life and property from any flooding and groundwater damage.
- A sustainable and holistic catchment wide approach is taken to development, of both private land uses and public facilities, on flood prone land.
- Climate change will inform decisions for future water infrastructure.
- Water sensitive urban design measures will be integrated into the built form to maximise liveability and reduce the impacts of climate change e.g. urban heat island effect and intensified rainfall events.
- Wherever possible, water courses are to be conserved or restored to their natural state. Reduce the consumption of potable water by encouraging water efficiency, the reuse of water and use of alternative water sources.
- Protect Council stormwater drainage assets during development works and to ensure Council's drainage rights are not compromised by development activities.

The proposed water quality system is satisfactory in principle but recommended to the Department that the detail water quality and hydraulic sizing be confirmed in accordance with the above.

**Groundwater and Geotechnical**

Reference documents

- Geotechnical opinion JK Geotechnics Ref: 36635PNlet1 5 February 2025
- Geotechnical report, Ref: 36335PNrpt Rev1 dated 5 November 2024.

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The proposed development is intercepting groundwater. The drained basement solution is to be confirmed with a groundwater seepage analysis. If the groundwater take will be greater than 3ML/year, then the project will require a Water Access Licence (Water NSW).

Dewatering management Plan for the site (construction and operation) is to be submitted to Council.

Feasibility of disposal of dewatered seepage by means of absorption systems down gradient of the buildings to be confirmed. Note the presence of downstream water dependant ecosystem.

It is recommended to the Department that an ecologist is confirms the impacts of flow modification on the downstream receiving environments and a water engineering specialist is involved in the design of the mitigation measures (infiltration, overland flow path design,)

**TRANSPORT & TRAFFIC ENGINEERING**

The development is for 147 independent living units (ILU), 120 residential care facility (RCF) beds and ancillary services including a resident's gym. Basement and on-grade parking for 235 cars is proposed.

**Residential Parking compliance**

In terms of parking the Warringah LEP 2000 (the relevant planning document) requires:

Residential care facility - 1 space per 10 beds plus 1 per 2 employees on duty at any one time plus an ambulance bay. I.e. a total of 12 plus 32 spaces for staff plus 1 ambulance bay. The developer proposes to provide 12 spaces for visitors to the RCF and 65 spaces for staff. An ambulance bay located outside the RCF is also proposed. These provisions are considered appropriate and acceptable.

Independent Living Units - Although the application is lodged on behalf of *Uniting Care* and the applicant suggests that the community housing rate is appropriate to apply and therefore only need to provide 1 for each 5 dwellings the size of the units. However, most of the ILU's being 2 or 3 bedroom units, suggests that the higher parking rate of 0.5 spaces per bedroom would be more appropriate in this instance as the units will cater for residential occupancy that would own many more than only 1 car between 5 ILU's. This will ensure that parking requirements are more likely to be contained on site and not spill over into adjacent residential streets and cannot be regarded as "low intensity low impact". As there are 19 x 1

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bed units, 74 x 2 bed units and 54 x 3 bed units a parking rate based upon the number of beds would require some 165 resident parking spaces.

In addition to this, while the LEP is silent in terms of visitor parking requirements it is noted that Forest Way is a clearway and there is therefore no opportunity for visitors to park on Forest Way. As there are more than 8 independent living units LEP visitor parking is required, and it is considered that the Warringah DCP rate for multi-dwelling housing of 1 space per 5 units would be appropriate to apply to this site. I.e. another 30 spaces are required for visitors.

A total of 195 parking spaces are required to support the ILU's. The developer proposes only 158 spaces for the ILUs comprised of 128 resident spaces and 30 visitor/gym spaces. These provisions are not considered sufficient. The developer should be required to provide the additional 37 spaces outlined above.

A total of 165 residential spaces, 42 visitor spaces, 65 staff spaces and an ambulance bay are required to support the development including another second lower level of at-grade parking in the outdoor carpark off Oates Avenue.

### **Accessible parking**

The applicant seeks an exemption the Warringah LEP requirement requiring that each care parking space not for employees must be 6m x 3.2m in size. In this respect, if the 165 resident spaces outlined above were to be provided, the LEP would require all of these to be 6m x 3.2m in size. This is considered excessive, and the requirements outlined in *SEPP Housing 2021* are considered more reasonable.

I.e. that 15% of these spaces must comply with AS2890.6 and that at least 50% of spaces must either be AS2890.86 compliant or 3.2m in width.

The applicant's proposal to provide a lesser proportion of spaces as accessible or 3.2m in width is considered unacceptable for a seniors housing development and no less than 25 spaces must be AS/NZS2890.6 compliant with 83 of these spaces constructed at a width of 3.2m and distributed appropriately within the basement parking areas.

### **Bus Zone indent on Forest Way**

It is noted that there is a Bus Zone on the Forest Way frontage of the development. When a bus is stopped at this Bus Zone it is unsafe and creates delays and congestion for traffic. The bus zone and shelter should be shifted slightly to the north and reconstructed as an

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indented Bus Zone within the existing set back area, OR alternatively, trees removed to allow it to be indented in its existing location while maintaining the existing footpath in front of it.

**Footpath reconstruction**

Footpaths should be reconstructed along the full site frontage at Council's standard footpath width of 1.5m.

**Upgrade of pedestrian facilities at Forest Way/Morgan Road**

The existing pram ramps at the signalised intersection of Morgan Road/Forest Way/Wyatt Avenue are not *Disability Discrimination Act* compliant being poorly oriented or too steep or too narrow. As the residents at the development will be relying upon these pram ramps for access to buses headed north and south on Forest Way (east) they will need to be reconstructed to address the above issues.