

SSD Scoping Report

Project Specific SEARs Request

Manly Health and Wellbeing Precinct 150 Darley Road, Manly (Former Manly Hospital)

Prepared for Aveo on behalf of Property and Development NSW

Beam Planning acknowledge that Aboriginal and Torres Strait Islander peoples are the First Peoples and Traditional Custodians of Australia. We pay respect to Elders past and present and commit to respecting the lands we walk on, and the communities we work with.

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1.0 Introduction

This Scoping Report has been prepared by Beam Planning for Aveo on behalf of Property and Development NSW (**PDNSW**) (the landowner) to seek the issuance of Project Specific Secretary's Environmental Assessment Requirements (**SEARs**) for the Concept and Early Works State Significant Development Application (**SSDA**) for a Health and Wellbeing Precinct at 150 Darley Road, Manly, known as 'Former Manly Hospital' (**the site**).

The proposed Health and Wellbeing Precinct, includes seniors housing and health services facilities, as well as a range of other ancillary supporting uses such as a childcare centre, food and drink premises and community facilities. The development is categorised as an SSDA under the following sections of Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**) as the project includes the development for the purposes of:

- Section 14: health services facility with an estimated development cost (EDC) of more than \$30 million; and
- Section 28: seniors housing that includes a residential care facility, with an **EDC** of more than \$30 million.

This Scoping Report has been prepared in accordance with the *State Significant Development Guidelines* adopted by the Department of Planning, Housing and Infrastructure (**DPHI**) in March 2024 and provides an overview of the project, sets out the statutory context and identifies the key likely environmental and planning issues that will be considered as part of this Concept and Early Works SSDA.



Figure 1 Vision for the future Manly Health and Wellbeing Precinct *Source: Hassell Architects*

1.1 Context of the Project

In October 2018, Manly Hospital was closed with all patients and services being relocated to the new Northern Beaches Hospital. In 2019 PDNSW undertook community consultation which led to the development of a concept master plan to create a vibrant health and wellbeing precinct on the site.

In late 2022 PDNSW sought expressions of interest to find a project delivery partner to transform the former the site consistent with the Community's vision. Following the expression of interest campaign, PDNSW requested detailed proposals from shortlisted respondents which was completed in May 2022.

In December 2024, PDNSW announced that Aveo has been awarded the role as PDNSW's delivery partner for the site. Aveo's vision for the Manly Hospital Precinct is to create:

A wellbeing precinct that will bring together integrated activities and building uses to promote live-work-health-leisure-learn in a vibrant hub – a natural extension and development of its surrounding communities.

This SSD incorporates the winning concept of the bid process including the built form and public domain outcome for the site in order to create a world leading neighbourhood that builds on a rich history of community care. The proposal is an innovate yet respectful solution that addresses community needs, whilst building on a culture of health and wellbeing that is inclusive, positive and progressive.

The project will be delivered through a long-term leasehold agreement, ensuring the site stays in NSW Government ownership.

Prior to, and during the process to select a delivery partner, PDNSW has been working with Council to prepare a Planning Proposal to include additional permitted uses on the site, in particular Seniors Housing. That Planning Proposal received a Gateway Determination in May 2024, subject to a number of conditions requiring more detailed studies, including the proposed built form.

During the course of the Planning Proposal, *State Environmental Planning Policy (Housing) 2021* was gazetted, which made Seniors Housing permissible on the site, thereby making the Planning Proposal largely redundant.

The Gateway conditions also seek a greater level of understanding of the future development and associated impacts. In light of the desire for a more detailed proposal and environmental assessment and in the context of seniors housing becoming permissible, a Concept SSD for the Precinct is considered a more efficient planning pathway to advance the development of the site. By proceeding with the SSD, it will ensure that the final intended design and uses are assessed concurrently and therefore provides much greater certainty for all stakeholders.

1.2 The Applicant

Applicant	Aveo on behalf of PDNSW
ABN	28 010 729 950
Address Level 11/35 Clarence St, Sydney NSW 2000	

1.3 The Site

The site address is 150 Darley Road, Manly and comprises three allotments legally described as Lots 2619, 2727, and 2774 in DP 752038. The site is located on North Head, on the lands of the Gayamagal People, approximately 10km north-east of the Sydney CBD. The site and the surrounding context contains a rich diversity of natural features and habitats.

The site has a total area of 46,545m², with two street frontages, including a ~151m frontage to Darley Road and a ~78m frontage to North Head Scenic Drive. The western boundary of the site adjoins Saint Paul's Catholic College Manly. The southern boundary of the site adjoins part of Sydney Harbour National Park. The majority of the eastern boundary adjoins Lot 2728 in DP 752038 which contains the Adolescent and Young Adult Hospice centre which opened in November 2018.

Currently, the site comprises the Former Manly Hospital and significant bushland on the southern portion of the site. Manly Hospital closed in October 2018, and all patients were transferred to Northern Beaches Hospital. Since then, none of the former hospital buildings on the subject site have been occupied and remains vacant.

Below is a list of the planning, heritage and environmental considerations that are applicable to the site. These have been considered throughout the development of the masterplan and will continue to inform the concept DA scheme:

- Littoral Rainforest Proximity Area
- Heritage items
- Scenic Protection Land
- Terrestrial Biodiversity Area
- Assessment of Significance Area Bandicoots
- High, Medium and Low Flood Planning Precinct
- Bush Fire Prone Land
- Sydney Harbour Foreshores and Waterways Area



THE SITE

Figure 2 Aerial view of the site

Source: Spatial Viewer and Beam Planning

NOT TO SCALE



2.0 Strategic Context

This section identifies the key strategic issues that are likely to be relevant to the justification and evaluation of the project and will be investigated in more detail in the EIS.

Table 1 Consistency of the project with relevant strategic plans

Matter	Comments
NSW Housing Strategy – Housing 2041	The project aligns with the NSW Housing Strategy, which advocates for diverse and affordable housing, benefitting people across the housing spectrum. The housing spectrum is understood as People's diverse housing experiences, including homelessness, home ownership, renting and housing needs for seniors or people with disability. One of the key pillars of the Housing Strategy is to provide housing that is diverse and meets varied and changing needs. The proposed development supports this pillar, by offering age-appropriate housing with accessibility features allowing people to age in place, which will support the statewide delivery of housing that meets the needs of the population at different life stages.
Greater Sydney Region Plan – A Metropolis of Three Cities and the North District Plan	The proposed development broadly aligns with the Greater Sydney Region Plan and the North District Plan. These plans outline a 40-year vision and a 20-year plan, focusing on the Region's housing diversity. The Greater Sydney Region Plan emphasises the need for adaptable housing solutions that meet the evolving needs of different life stages, including seniors. The provision of age-appropriate, accessible housing will support the demand for seniors' accommodation in established urban areas, in proximity to services and amenities. The North District Plan prioritises fostering healthy, creative, culturally rich and socially connected communities and the creation and renewal of great places and local centres, and respecting the district's heritage. The proposal supports the action of delivering healthy, safe and inclusive places for people of all ages and abilities, incorporating a mix of uses into the development masterplan. The revitalisation of the Former Manly Hospital provides the opportunity to create a mixed-use precinct accompanied by a public realm that brings people together and is enjoyable and attractive for all.
Towards 2040 – Northern Beaches Council's Local Strategic Planning Statement 2020	The Northern Beaches Local Strategic Planning Statement (LSPS) is Council's 20-year roadmap for sustainably managing how the Northern Beaches grows and evolves. One of the unique characteristics of the Northern Beaches is that the LGA is particularly vulnerable to natural hazards including bushfire, flooding, landslip, coastal erosion and storms. This significantly influences the location of new housing developments. The LSPS focuses on people and the vision for everyone in the Northern Beaches to be able to engage in activities where they interact with others, improve their health and wellbeing or get involved in education. The site is currently closed to the community. The project supports the Plans vision, providing a revitalised mixed-use precinct that encourages interaction and social connection whilst providing a space for seniors to live comfortably and seek health and wellbeing services. The significant public realm proposed will revitalise the site itself and provide a key community node as part of the wider connectivity of North Head. The precinct will be a flexible, adaptable, accessible and multi-use space that can cater for a range of uses.
Northern Beaches Local Housing Strategy 2021	The Northern Beaches Local Housing Strategy is built upon the vision that this diverse mix of homes will be contained primarily within existing urban areas, with their design and construction respecting the area's heritage, environmental features and existing character. The proposed development speaks to this vision, transforming the heritage listed 'Former Manly Hospital' building and surrounding area into a mixed-use health and wellbeing precinct that will provide seniors housing accommodation, and a range of health and wellbeing uses, that allows for the appreciation and enjoyment of the heritage listed building and surrounding heritage character of North Head.
Northern Beaches Environment and Climate Change Strategy 2040	The Environment and Climate Change Strategy is Council's plan for a healthy and diverse environment that is respected, supported and celebrated. One of the goals of this strategy is to reduce the risk of natural hazards and climate change to the community and the environment. The proposal supports this goal, by activating and maintaining the asset protection zone, at the south of the site, to ensure all development is an adequate distance from any potential bushfire prone land. The proposal is sympathetic of the significant bushland and surrounding environmental conservation area of the site and has developed a masterplan that appreciates and preserves this. The project will also seek to implement a number of sustainability initiatives through adaptive reuse of buildings, efficient energy utilisation, WSUD, and transport.
State Environmental Planning Policy (Housing) 2021	 Whilst noting it is not a Strategic Plan, the proposal aligns with the principles of the State Environmental Planning Policy (Housing) 2021, particularly: (a) enabling the development of diverse housing types, including purpose-built rental housing, (b) encouraging the development of housing that will meet the needs of more vulnerable members of the community, including very low to moderate income households, seniors and people with a disability,

Matter	Comments
	These principles highlight the NSW Government's policy position, in encouraging the development of seniors housing. The proposed development directly aligns with this policy provision, providing a significant number of seniors housing accommodation within a mixed use health and wellbeing precinct.

3.0 The Proposed Development

The Concept SSDA for the Manly Health and Wellbeing Precinct will establish the planning framework to guide the redevelopment of the former Manly Hospital.

3.1 Project Vision

The vision for the site is to create a unique health and wellbeing sanctuary that supports the needs of the broader community. Through consultation with PDNSW, feedback received in interactive workshops undertaken as part of previous consultation, consultant reports and advice, the master plan aims to deliver a project that:

- Enhances cultural and environmental connection with an emphasis on First Nations connection to Country.
- Will offer a new high-quality seniors living and aged care facility that will align with modern consumers and resident requirements.
- Provides for publicly accessible open space and public realm activation.
- Embraces heritage integration, celebration and enjoyment for the broad community.
- Invites community participation with the landscape and environment.
- Accommodates planning density requirements with low impact.
- Includes basement car parking to increase landscaped open space, reduce traffic movement and improve the pedestrian experience.
- Creates a publicly accessible heath support network focusing on preventative and primary care for community
- Achieves a 6-star green star rating for buildings and community.

The proposed redevelopment seeks to create a unique and vibrant destination that can deliver significant social benefits to residents, visitors and workers in the Manly precinct, the broader Northern Beaches Local Government Area and Sydney region.

Studies identified the Manly locality, which supports a higher density of population than much of the Northern Beaches LGA, currently experiences an under-supply of several types of community facilities, including the following:

- Larger scale, flexible community spaces, with the existing provision of smaller, older community facilities not meeting contemporary community needs. The need for a large (1000-2,000m² +) integrated multipurpose community facility is identified for Manly. It is a Council priority to respond to the changing needs of the community through delivery of new, contemporary, multipurpose spaces.
- Northern Beaches LGA is currently home to an ageing population, with 21% of residents over 60 years old, compared
 with the Sydney average of 19%. By 2036, the number of residents aged 85+ is forecasted to increase by 85%.
 Developing accessible local health facilities and regional health infrastructure is a key priority of the North District
 Plan, as is the coordination of additional health, social and aged care services, to which the development will make a
 significant contribution.
- In addition, within the Children's Services Strategy (November 2019), Northern Beaches Council has recognised a childcare service gap in Manly, in addition to Balgowlah and the upper Northern Beaches. Key findings in this document include an increasing number of children aged 0-4 years between 2016 and 2036 which will result in a greater demand for children's services. It is a vision of the Children's Services Strategy to ensure that "Children's Services are valued as an essential part of Council's commitment to a healthy and engaged community".

Given the broad range of community infrastructure needs, including health infrastructure, identified for the local community, the proposed development will provide significant social benefits through co-locating uses (bringing community services together in a single location) and responding to the fragmentation and lack of integration of related services. Best practice for provision of social infrastructure favours the clustering of community facilities, to enhance community accessibility and connectivity.

A key objective of the proposed development is to revitalise the now redundant hospital complex, projecting it into a new generation of relevance for the local and wider community. The adaptive reuse of the heritage significance buildings prioritises the retention of significant fabric and spaces, in addition to reinstating the historic entrance to the site, and the retention of the sandstone boundary walls along the eastern and western boundaries. The adaptive reuse of the heritage buildings is seen in **Figure 3** and the proposed public realm is shown in **Figure 4**.



Figure 3 New public spaces and adaptive reuse of the heritage buildings *Source: Hassell Architects*



Figure 4 New public realm for the community to enjoy *Source: Hassell Architects*

The Health and Wellbeing precinct, consists of seniors housing, health services facilities as well as a range of other ancillary uses such as community facilities, food and drink premises and a childcare facility. To promote public access and

welcome community to the precinct, the concept plan (see **Figure 5**) has been designed to create three 'spines' throughout the site, which provide community access from Darley Road through to new public parkland and the remnant forest. These spines are activated with a complex array of uses and spaces to celebrate the heritage buildings and site. The seniors living offers opportunity for Manly residents to age in place, remain in the local community, and for local activation, particularly during the week and evenings.



Figure 5 Concept plan for the site Source: Hassell Architects

The proposed redevelopment will offer a new high-quality mixed use residential and community-based facility that will align with modern consumers and resident requirements. Importantly, the proposed uses including seniors living will allow for an increase in housing diversity, including a modern retirement living and aged care facility that will enable residents to age in place within an intergenerational facility that is support by high levels of amenity and ancillary uses.

The masterplan seeks to serve the needs of the local community, providing a range of employment and community benefits in a contemporary facility that will respond to health and wellbeing requirements to support community wellbeing outcomes, improve access to public facilities, as well as provide local business and employment opportunities within a multifunctional and sustainable development.

3.2 Concept Plan

The Concept SSDA will establish the framework for the future detailed applications on the site, as part of this the SSDA will seek consent for land uses, maximum GFA and building envelopes. It will also establish the key development principles and considerations that will be implemented through the future stages through urban design guidelines. A summary of the key development metrics proposed is provided in **Table 2**.

The indicative masterplan prepared by Hassell, in consultation with Djinjama and Arcadis, illustrates the land uses and incorporation of the heritage buildings into the proposed development, shown in **Figure 6** and **Figure 7**.

Table 2 Summary of key development metrics

Component	Description
Site Area	46,545m ²
Estimated GFA	29,730m² comprised of: 14,818m² seniors housing, including a residential aged care facility 14,912m² health and wellbeing uses (inclusive of 2,400m² of community and other ancillary uses)
Usable Open Space	19,300m ² (~42% of the site)
Maximum Building Height	RL81.8 (Figure 8 provides indicative building heights for the proposed development and Figure 9 provides sections through the site.) A Visual Impact Assessment will be prepared as part of the SSDA to support the building height.



Figure 6 Indicative masterplan of the site *Source: Hassell Architects*



Figure 7 Early render of the project *Source: Hassell Architects*

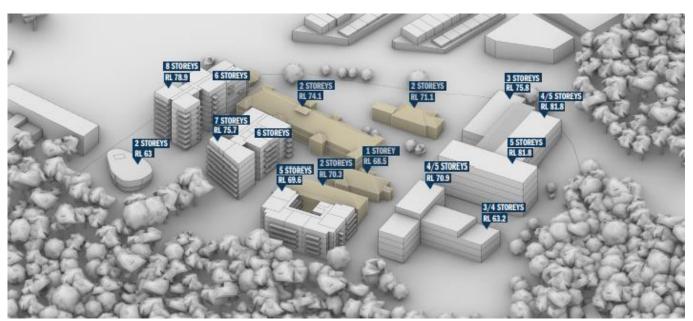


Figure 8 Indicative building heights *Source: Hassell Architects*

Site Section: Seniors Living



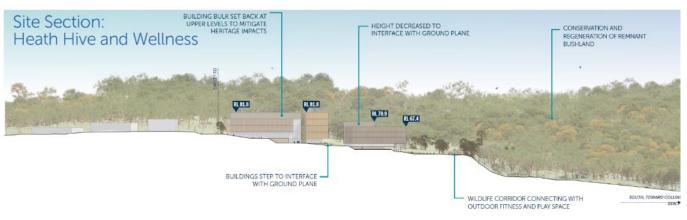


Figure 9 Indicative sections through the site *Source: Hassell Architects*

The built form strategy is founded on celebrating the heritage buildings and complementing them with new contemporary form comprising materials local to the place. The scale of new buildings is formed to provide a defined central setting for the heritage buildings. Height is arranged to the precinct edges, allowing views through to the harbour to be shared. **Figure 10** demonstrates the orientation and arrangement of the buildings on site in order to:

- share views with existing residential apartments on Darley Road at St Patricks Estate, with lower form central to the site;
- providing new sight lines from Darley Road past heritage buildings to the public parkland;
- provision of lower scale form where there are public spaces, allowing sun access and daytime enjoyment;
- a stepping of form to respond to topography, and provide semi-public roof terraces overlooking the harbour; and
- support accessibility strategies with a series of platforms to allow equitable east/west access, combined with public lifts for north/south.

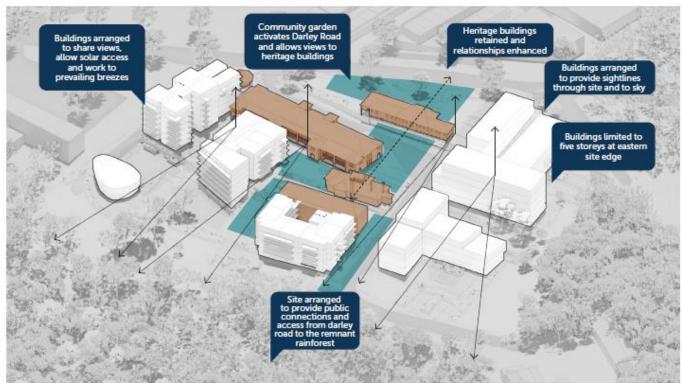


Figure 10 Arrangement of buildings on site

Source: Hassell Architects

3.3 Detailed Works

The SSDA will also include seeking consent for the first stage of detailed works, comprising site preparation for the future development under the Concept Plan. These early works comprise:

- Demolition of all buildings that are not being retained for their local heritage significance;
- Earthworks to establish site levels including excavation to support three future basement car parks; and
- Necessary tree removal.

3.4 Consideration of Alternatives

The following alternatives were considered as part of the process leading to this proposal:

- Do Nothing: This option would involve leaving the site in its current unused state, which would result in an under utilisation of large government site in a high amenity location. Doing nothing is likely to lead to the long term deterioration of the heritage items and risk of anti-social behaviour occurring on the site.
- Redevelop for a Hospital: This option would involve redeveloping the site for a new hospital as provided for under the
 current LEP. The NSW Government made the decision to close Manly Hospital as part of the process to consolidate
 public health infrastructure on the Northern Beaches and deliver the new \$600 million Northern Beaches Hospital. As
 a result, there is no longer a need for a new public hospital in this location.
- The Proposal: The proposed option will deliver an integrated health and well-being precinct that as detailed in this section will reintroduce health services on the site, whilst increasing housing diversity to create a unique and vibrant destination that can deliver significant social benefits to residents, visitors and workers in the Manly precinct, the broader Northern Beaches Local Government Area and Sydney region.

4.0 Statutory Context

This section provides an overview of the key statutory requirements for the project.

 Table 3
 Statutory context of the site

Matter

Comments

Power to Grant Consent

Under Section 28 of the Planning Systems SEPP, development for the purposes of seniors housing is considered State Significant Development if the seniors housing component:

- has an estimated development cost of more than \$30 million on land in the Greater Sydney region,
- includes a residential care facility, and
- other components of the proposed development are not prohibited on the land under an environmental planning instrument.

Under Section 14 of the Planning Systems SEPP, development for the purposes of hospitals, medical centres and health research centres are considered State Significant Development if the development has an estimated development cost of more than \$30 million.

The proposal is for the purpose of a health and wellbeing precinct, comprising seniors housing, inclusive of a residential care facility and health services facilities with a capital investment value (CIV) of more than \$30 million respectively. The permissibility of seniors housing is discussed in full below but is permissible on the site under the Housing SEPP, excluding the portion of the site that is identified as 'proximity to littoral rainforest' land. The permissibility of development on this portion of the site is laid out in the following section of the table. Therefore, the proposal is considered State Significant Development pursuant to Section 28 and Section 14 of Schedule 1 of the Planning Systems SEPP.

The Minister for Planning and Public Spaces is the consent authority pursuant to Section 4.5(a) of the EP&A Act.

Permissibility

The proposal is located on land which is subject to the *Manly Local Environmental Plan 2013* (Manly LEP 2013). The site is zoned SP2 Health Services Facilities and C2 Environmental Conservation. Under the Manly LEP 2013, any development that is ordinarily incidental or ancillary to Health Services Facilities is permitted with consent in the SP2 zone. Health Services Facilities have the following definition, under the Manly LEP 2013:

Health Services Facility means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following –

- (a) a medical centre,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) patient transport facilities, including helipads and ambulance facilities,
- (e) hospital

Residential accommodation is not considered to be ordinarily incidental or ancillary to Health Services Facilities, so seniors living accommodation is therefore, prohibited in the SP2 zone.

Section 79 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) states that seniors housing is permitted in a range of zones (defined as prescribed zones), which includes the SP2 zone. Section 81 states:

Development for the purposes of seniors housing may be carried out with development consent— (a) on land to which this Part applies, or

(b) on land on which development for the purposes of seniors housing is permitted under another environmental planning instrument.

Section 79 applies and therefore, seniors housing is permissible on the site due to the following:

The Housing SEPP contains the following additional provision for SP2 zoned land:

- 86 Development standards for seniors housing—Zones RE2, SP1, SP2 and RU5
- (1) Development consent must not be granted for development for the purposes of seniors housing unless the consent authority is satisfied as follows—
- (b) for development on land in Zone SP1 Special Purpose or Zone SP2 Infrastructure—
- (i) development for the purposes of a place of public worship, an educational establishment, a hospital or seniors housing is permitted on the land, and
- (ii) the land adjoins land in a prescribed zone,

The prescribed zones are specified in Section 79 of the Housing SEPP, and include the SP2 zone. A hospital is permitted on the land and the site adjoins other SP2 zoned land. Therefore, the site meets the requirements of Section 79 and Section 86 that allow Chapter 3 Part 5 of Housing SEPP to apply. Therefore, pursuant to Section 81 of the Housing SEPP, seniors housing is permitted with consent on the site. This is seen in **Figure 11**.



Figure 11 Zoning of the site

Source: Spatial Viewer

Under Section 80 of the Housing SEPP, Part 5 Housing for seniors and people with a disability does not apply to land identified under State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP), Chapter 2, Coastal Management. As defined in the Resilience and Hazards SEPP:

The coastal wetlands and littoral rainforests area is made up of land identified as "coastal wetlands" or as "littoral rainforests" on the Coastal Wetlands and Littoral Rainforests Area Map. The land so identified includes land identified as "proximity area for coastal wetlands" and "proximity area for littoral rainforest".

The existing hospital, and a small part of the proposed development is located within the 'proximity area for littoral rainforest' under the Resilience and Hazards SEPP, seen in **Figure 12**. The Housing SEPP provision to allow seniors housing development in SP2 zones does not apply to the portion of the site that is identified as a 'proximity area for littoral rainforest'.



Figure 12 Portion of site subject to 'proximity area for littoral rainforest'

Source: Spatial Viewer

Matter Comments Therefore, a future development will have to utilise the Minister's power under Section 4.38(3) of the Environmental Planning and Assessment Act 1979 to approve the 'partly prohibited' development of seniors housing on this area of the site (refer to Figure 13 which illustrates the part of the site within the 'proximity to littoral rainforest area'), noting the relevant area is currently cleared land or occupied by existing buildings and hardstand area. DARLEY ROAL Masterplan overlaid with 'proximity to littoral rainforest' map Figure 13 Source: Hassell Architects Other Approvals Biodiversity Conservation Act 2016: Due to the nature of the site a Biodiversity Development Assessment Report will be prepared as part of the SSDA. National Parks and Wildlife Act 1974: An Aboriginal Cultural Heritage Assessment report will be prepared as part of the SSDA. Rural Fires Act 1997: A consent under section 100B of the Rural Fires Act 1997 is likely to be required. Roads Act 1993: A consent under section 138 of the Roads Act 1993 will likely be required. Pre-conditions to Environment Protection and Biodiversity Conservation Act 1999 exercising the power State Environmental Planning Policy (Biodiversity and Conversation) 2021 to grant consent State Environmental Planning Policy (Resilience and Hazards) 2021 State Environmental Planning Policy (Transport and Infrastructure) 2021 State Environmental Planning Policy (Housing) 2021 Mandatory matters Environmental Planning and Assessment Act 1979 for consideration State Environmental Planning Policy (Planning Systems) 2021 State Environmental Planning Policy (Housing) 2021 State Environmental Planning Policy (Biodiversity and Conversation) 2021 State Environmental Planning Policy (Resilience and Hazards) 2021 State Environmental Planning Policy (Industry and Employment) 2021 State Environmental Planning Policy (Transport and Infrastructure) 2021 State Environmental Planning Policy (Sustainable Buildings) 2021 Manly Local Environmental Plan 2013

5.0 Community Engagement

As outlined in **Section 1.1**, the community are aware of proposed future development on the site, and have been presented with an indicative masterplan for the development of the site. As this proposal is the more detailed evolution of the masterplan, it is important that further engagement is undertaken with the community. Aveo in consultation with PDNSW are currently working through a detailed engagement strategy to deliver best practice engagement through the development phase of the project.

The applicant will be undertaking future engagement to inform the EIS in accordance with the SEARs and DPE *Undertaking Engagement Guidelines for State Significant Projects (2021)*. Consultation is anticipated with the following Government and industry stakeholders:

- Department of Planning, Housing and Infrastructure;
- Transport for NSW;
- NSW Government Architect's Office;
- Northern Beaches Council;
- Rural Fire Service;
- National Parks and Wildlife Service;
- Biodiversity, Conservation & Science; and
- Relevant Service Providers Ausgrid, Jemena, Sydney Water.

6.0 Proposed Assessment of Impacts

This Section identifies the matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

Table 4 Matters applicable to the site requiring further assessment

Assessment Matter	Proposed Approach
Bushfire	A Bushfire Assessment Report will be undertaken for the proposed development, as the site is identified as Vegetation Category 1 and Vegetation Buffer Bushfire Prone Land. The masterplan has been designed with regard to establishing an adequate asset protection zone (APZ), inclusive of a fire trail utilising the existing cleared areas on the site.
Biodiversity	Due to the nature of the site, a Biodiversity Development Assessment Report will be prepared as part of the SSDA. The proposal does not involve the removal of any significant vegetation, aside from what is required, to comply with APZs and required access roads.
	The C2 area already has existing hardscape improvements. No built form is proposed within the C2 zoned part of the land, and only a small amount of minor works relating to an emergency access road and environmental protection will be undertaken within this zone.
	The masterplan results in a net increase in vegetation across the site, restoring parts of the C2 zoned land, from hardscaped surface to vegetated public open space.
	The Vegetation Management Strategy that will be included in the EIS will guide vegetation management across the site, and specifically in the APZs. The strategy will ensure the performance objectives of the APZs are achieved via a process of removing weed infestations and restoring native vegetation.
Built Form and Urban Design	The proposal will be accompanied by an Architectural and Urban Design Report that supports the proposed built form and urban design outcomes for the masterplan. The built form and urban design of the site will maximise the adaptive re-use of heritage buildings and will set a new precedence in intergenerational activity and engagement. The scale of new buildings is formed to provide a defined central setting for the heritage buildings. Height is arranged to the precinct edges, allowing views through to the harbour to be shared. The built form will complement the surrounding bushland and rich biodiversity, with a focus on sustainability across the site. Buildings will be arranged on site in order to:
	Share views with existing residential apartments on Darley Road at St Patricks Estate, with lower form central to the site
	 Provide new sight lines from Darley Road past heritage buildings to the public parkland Provide lower scale form where there are public spaces, allowing sun access and daytime enjoyment
	A stepping of form to respond to topography, and provide semi-public roof terraces overlooking the harbour
	 Support accessibility strategies with a series of platforms to allow equitable east/west access, combined with public lifts for north/south access across the sloping site (refer part B2.4. 7) Provide significantly diminished building footprints compared to the existing hospital that enables opportunities for publicly accessible spaces and community access throughout the site to parklands, community facilities and services.
Design Excellence	A Design Excellence Strategy will be prepared as part of the EIS establish the framework to ensure design excellence is achieved from Concept through the to the delivery of the projects.
Heritage	A Statement of Heritage Impact will be prepared, to accompany the proposal, due to the local heritage listing of one of the Former Manly Hospital buildings. The Statement of Heritage Impact will also consider the significance of the non-listed buildings within the site, and address the general heritage character of North Head, and the impacts of the development on surrounding heritage items, including the Internation College of Management, Sydney and Saint Paul's Catholic College, which forms part of the state heritage listed St Patricks Estate.
View Loss and Visual Impact	A Visual Impact Assessment will be undertaken and will accompany the EIS to assess the appropriateness of the visual impacts of the proposed development from key locations including Manly, North Head and from Sydney Harbour, and where appropriate make recommendations.

Assessment Matter	Proposed Approach
	A View Loss Assessment will consider the impact of the proposed envelopes from existing surrounding residential uses. The assessment will be used to refine the envelopes and maximise view sharing.
Traffic and Parking	A Traffic, Transport and Accessibility Impact Assessment will accompany the EIS, providing commentary on the impact of increased vehicular traffic on the site and on surrounding sites and an assessment of the traffic and parking impacts proposed on site. Additionally, a Construction Traffic Management Plan will accompany the Concept Proposal, to assess the traffic impacts of the early works construction.
Public Domain	The EIS will be accompanied by Landscaping and Public Domain Plans, and a Design Report which will demonstrate how the proposal will deliver a high-quality public domain. The public domain will be designed to respect and integrate Aboriginal and European heritage across the site, with key primary and secondary public domain spaces sequenced throughout the site. The existing kiosk and Gateway arch are significant in creating the arrival points to the site. This will be supported through a high-quality streetscape public domain address to Darley Road providing acknowledgement of the precinct in the neighbourhood. A CPTED report will also be prepared, to accompany the EIS to ensure that the public domain around the site and across the site is safe, well-lit and accessible.
Residential Amenity	The residential amenity of the Seniors Living housing will be assessed within the Design Report and EIS to confirm a high level of amenity, private open space, ventilation and solar access is achieved. Guiding this assessment will be the design principles for residential apartment development under schedule 8 of the Housing SEPP, the Apartment Design Guide (ADG), Liveable Housing Australia (LHA) design guidelines and the Seniors Housing Design Guide.
Ecology	The presence of Sydney Harbour National Park on the southern portion of the site will necessitate a detailed analysis of the ecological impacts of the proposal. Careful consideration has been made to the proposed concept, to the retention of existing mature vegetation across the site, particularly on the southern side of the site, as a buffer between the built form and the National Park. An Ecological Assessment and Landscaping Plan will accompany the EIS to assess the ecological impacts of the proposal.
Ecologically Sustainable Development	A Sustainability Report will accompany the EIS, inclusive of a BASIX Certificate and Net Zero Statement, to outline the proposal's relevant sustainability principles and targets. The report will provide a strategy for the proposal to achieve these targets and achieve a high level of ecologically sustainable development throughout the development.
Aboriginal Cultural Heritage	As mentioned in Section 1.3 , the surrounding site context contains a rich diversity of natural features and habitats and contains a long history of Aboriginal occupation. An Aboriginal Cultural Heritage Assessment Report will be prepared and accompany the EIS to determine if items of Aboriginal Cultural Heritage are present on the site, and recommendations for actions to be taken before, during and after an activity to protect Aboriginal objects and heritage. Additionally, the architectural plans and design report for the proposal will be prepared in collaboration with Djinjama to commit to a masterplan that responds to Aboriginal culture and heritage responsible, appropriately and respectfully. Connecting with Country principles will be carried throughout the masterplan, through a combination of public art, landscaping, opportunities for storytelling, and Care of Country following guidance and advice from Djinjama.
Flooding/ Ground and Water Conditions	Areas of the site are identified as being subject to flooding and therefore, a Flood Impact Risk Assessment will be prepared for the proposal. Strategies will be developed to manage the flooding risk of the site, specifically in the northern portion of the site, along the access way. Similarly, a surface and ground water impact assessment will be prepared and accompany the EIS to assess the impact of ground water on the proposed development.
Construction Impacts	A Noise and Vibration Assessment will be undertaken to assess the key sources of noise and vibration during construction and their impacts upon the surrounding development. This development generally encompasses residential dwellings and educational institutions. Specifically, the assessment will evaluate and outline measures to minimise and mitigate the potential noise impacts from the construction of the proposed development, as well as from the surrounding uses on the future seniors housing development.
Waste Management	A Construction Waste Management Plan will be prepared and submitted alongside the EIS, in line with Northern Beaches Council's requirement for all development applications inclusive of demolition. This Plan will be prepared with regard to the <i>Waste Management Guidelines</i> on Council's website to make use of re-use and recycling opportunities and minimise the impact and disturbance on surrounding amenity, public safety, roadways and natural and built environment.

Assessment Matter	Proposed Approach
Social Impact	The EIS will be accompanied by a Social Impact Assessment which will assess the social and economic positives and negatives of the proposed development. The Assessment will assess all potential impacts of the proposed Seniors Living accommodation and health services facility on the surrounding residences, businesses, communities and individuals.
Additional Technical Reports	The following impacts are matters that will be addressed within the EIS: Wind Impact Accessibility Stormwater Geotechnical Contamination Arboricultural