



NSW RURAL FIRE SERVICE

Northern Beaches Council
PO Box 882
MONA VALE NSW 1660

Your reference: PEX2020/0009
Our reference: SPI20201119000198

ATTENTION: Adonna See

Date: Wednesday 13 January 2021

Dear Sir/Madam,

Strategic Planning Instrument

LEP Amendment - Planning Proposal

Amendments to Schedule 1 of the Manly Local Environmental Plan 2013 to Allow Additional Permitted Uses Within the Former Manly Hospital Site

I refer to your correspondence dated 17/11/2020 inviting the NSW Rural Fire Service (NSW RFS) to comment on the above Strategic Planning document.

The NSW RFS has considered the information submitted and provides the following comments.

The referral relates to amendments to Schedule 1 of the Manly Local Environmental Plan (LEP) 2013 to allow the following additional permitted uses within the former Manly Hospital site:

- 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.

A number of the above proposed additional permitted uses are classified as Special Fire Protection Purpose (SFPP) developments and are therefore subject to compliance with the provisions of Chapter 6 of *Planning for Bush Fire Protection (PBP) 2019*.

Future development classified as SFPP must demonstrate compliance with the following:

- The provision of asset protection zones (APZs) must be provided in accordance with Section 6.8.1 and Table A1.12.1 of *PBP 2019*;
- Internal access roads must comply with Section 6.8.2 of *PBP 2019*;
- The provision of water, electricity and gas must comply with Section 6.8.3 of *PBP 2019*; and

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- All future development will need to be supported by an emergency and evacuation plan that complies with Section 6.8.4 of *PBP 2019*.

Future master plans and development applications must ensure that new development complies with the acceptable solutions of Chapter 6 *PBP 2019* given the vulnerable nature of occupants being more at risk of bush fire attack. Where practically achievable, full compliance should be provided before variations to the required bush fire protection measures are considered. The current master plan provided, which is not the subject of this Planning Proposal, demonstrates that a number of future and existing buildings will not comply the provisions of Chapter 6 of *PBP 2019*, especially in relation to the provision of compliant asset protection zones (APZs) and construction requirements. As such, it is advised that the master plan may need to be amended to demonstrate compliant building locations and APZs.

Given that future development of the subject site will likely proposed to retain and make use of existing buildings, future applications must address all existing non-compliant aspects of the existing buildings and the subject site. Section 6.4 of *PBP 2019* requires that new development within existing SFPP sites apply a combination of bush fire protection measures, including improved construction standards, APZs and evacuation management, in order that a better bush fire outcome than if the development did not proceed. Again where achievable, full compliance with *PBP 2019* should be provided before variations to the required bush fire protection measures are considered.

Furthermore, the proposed additional permitted uses will significantly increase the number of occupants within the subject site which presents a number of challenges in relation to emergency management, evacuation, access and egress as that the existing site layout and buildings have not been designed with the benefit bush fire protection requirements. It has been shown that the existing access provisions within the subject site do not fully comply with the acceptable solutions of Chapter 6 of *PBP 2019*. Future development will need to demonstrate that the existing and proposed internal roads will allow future occupants to safely exit the subject site whilst still providing access for firefighting vehicles and emergency management on the hazard interface.

In this regard, future developments will need to include upgrades to the existing access road, give consideration to the provision of a perimeter road at the hazard interface, an additional access point to the public existing public road and the provision of a designated safe refuge building to accommodate all occupants in the event of an emergency. Future developments must also be supported by a traffic study that demonstrates that the internal road and surrounding infrastructure can support future increased activity. Future developments must also be supported by a traffic study that demonstrates that the internal road and surrounding infrastructure can support future increased activity.

All other development must demonstrate compliance with the provisions of Chapters 5, 7 and 8 of *PBP 2019* where applicable.

For any queries regarding this correspondence, please contact Emma Jensen on 1300 NSW RFS.

Yours sincerely,

Kalpana Varghese
Manager Planning & Environment Services
Planning and Environment Services

Lachlan McCallum

From: Shirin Adorbehi <Shirin.Adorbehi@cox.com.au>
Sent: Wednesday, 16 February 2022 2:16 PM
To: Louise Maroney; Tahlee Smith
Cc: Lachlan Abercrombie; Lachlan McCallum; Jonathon Hain
Subject: FW: Former Manly Hospital Site

Hello All,

Please see below response from RFS regarding the secondary access point.

Thank you,

Shirin Adorbehi
Senior Associate



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To manage COVID-19 risks our Team is working flexibly. Our Reception staff are in the Studio to direct your call.

From: david@petersonbushfire.com.au <david@petersonbushfire.com.au>
Sent: Wednesday, 16 February 2022 1:56 PM
To: Shirin Adorbehi <Shirin.Adorbehi@cox.com.au>
Subject: FW: Former Manly Hospital Site

Hi Shirin,

Please see response from RFS below.

They are stating that a single access point to Darley Road will comply. They also request the road to Collins Beach Road be maintained for emergency access based solely on the fact that it is there. However, it's not required for compliance.

Regards
David



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FPA AUSTRALIA (NO.BPAD18882) BPAD LEVEL 3 ACCREDITED PRACTITIONER
ABN 28 607 444 833

From: Alastair Patton <Alastair.Patton@rfs.nsw.gov.au>
Sent: Wednesday, 16 February 2022 1:22 PM
To: david@petersonbushfire.com.au
Subject: RE: Former Manly Hospital Site

Hi Dave,

I managed to have a discussion with Kalpana. In this particular instance, given that the proposed access provides egress away from the hazard, the proposed access point in combination with the proposed loop road could be considered to meet the performance criteria for access.

Occupant egress through to Collins Beach Road in the south east is unlikely as it leads towards the hazard, however the proposed emergency link to Collins Beach Road is likely to be of benefit to emergency services and should be maintained and improved where possible. For future DA stages, the bushfire consultant must demonstrate how the loop road and emergency link can address the performance criteria for access.

Regards,



Alastair Patton | Development Assessment and Planning Coordinator| Planning and Environment Services (East)

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PREPARE. ACT. SURVIVE.

From: david@petersonbushfire.com.au <david@petersonbushfire.com.au>

Sent: Wednesday, 16 February 2022 10:35 AM

To: Alastair Patton <Alastair.Patton@rfs.nsw.gov.au>

Subject: Former Manly Hospital Site

Hi Al,

Thanks for the time on the phone this morning.

I attach the letter prepared by COX Architecture post-inspection in December. The letter shows how an additional Darley Road link is not possible due to grade, and the condition of the driveway across National Park to Collins Beach Road is suitable as an emergency access link.

I also attach my bushfire report prepared for the Planning Proposal – the figures give you a good idea of the access loop proposed.

I also attach the summary of proposal for the AYAH development within the adjoining southern lot and RFS acceptance. The existing access arrangement of one link to Darley Road and an emergency link to Collins Beach Road was accepted for that proposal (currently under construction).

Thanks for considering this matter at your meeting today. I'll talk to you after lunch.

Regards

Dave



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