

15th July 2025

The CEO
Northern Beaches Council
PO Box 82
Manly NSW 1655

Attention: Tom Burnes – Principal Planner

Dear Mr Burnes,

Development Application No. DA2025/0042
Issues response/ Supplementary Statement of Environmental Effects
Proposed mixed use industrial development
35, 37 and 39 Carter Road, Brookvale

Reference is made to Councils issues letter of 29th May 2025 in which a number of issues were raised. This supplementary statement of environmental effects details the considered response to the issues raised and is to be read in conjunction with the following amended/additional plans and documentation:

- Amended Architectural plans various revisions prepared by Figgis + Jefferson Tapa Architects.
- Amended landscape plans Revision D prepared by Ground Ink.
- Traffic and parking response, dated 4th July 2025, prepared by Varga Traffic Planning.
- Detailed Site Investigation and Assessment Report, dated 25th June 2025, prepared by Dr Upsilon Environments.
- Remediation Action Plan prepared by Dr Upsilon Environments.
- Response to RFI/ DSAP minutes prepared by Figgis + Jefferson Tapa Architects (Attachment 1).

The amendments can be summarised as follows:

- Increase landscaping and the provision of a seating area adjacent to the Carter Road frontage.
- Relocation of the ground floor level unisex WC closer to the café.
- Provision of an indicative Café layout with final fit-out subject to separate approval.
- Additional tenant and visitor bicycle parking.
- Provision of motorcycle parking.
- The provision of an enlarged landscape planter at Level 1.

- The provision of EV charging allowances.
- Amendments to the car parking layout.
- The provision of a commercial waste storage area.
- The nomination of indicative building identification and tenant signage.

We respond to the various issues as follows.

DSAP Report and Urban Design

Response: A comprehensive response to the DSAP minutes is at Attachment 1. In particular, we note that landscape opportunity has been increased within the Carter Road front setback with a 1.5 metre wide pedestrian pathway provided along the West Street frontage. This submission is accompanied by amended landscape plans Revision D prepared by Ground Ink which nominates additional landscaping within the Carter Road front setback and within the Level 1 carparking area as recommended by DSAP.

In relation to the DSAP recommendation that a recognition and design response to country is provided I would like to start with acknowledging the Traditional Custodians of the land upon which the proposed development is situated and pay my respects to their ancestors and Elders past and present. I extend this acknowledgement and respect to all Aboriginal or Torres Strait Islander people.

I note that the application provides for the retention/ reuse of existing building elements including the face brickwork at both street frontages which not only goes to the notion of sustainability but also the reuse of a natural earth/ clay based material. The proposal also incorporates a publicly accessible outdoor seating area adjacent to the café where patrons can gather or sit quietly within an informal landscaped setting. These elements represent an appropriate recognition and design response to country.

Car Parking, Access and Traffic

Response: This submission is accompanied by a Traffic and parking response, dated 4th July 2025, prepared by Varga Traffic Planning. This report addresses the carparking, access, and traffic issues identified within the traffic referral with the architectural plans amended as required. This report contains the following commentary in relation to the incorporated amendments:

- *one kerb extension on West Street as marked has been removed in order to add an additional parking space. Time restricted parking with “1P restriction” will also be implemented along West Street to ensure adequate turnover of parking and can be conditioned as part of the approval*
- *the driveway ramp on the Lower Ground Floor has been modified as per Council’s comments*
- *a convex mirror has been added on the First Floor near the top of the ramp*

- *the layout of parking P17, P18, and P19 next to Unit IN10 has been updated as per Council's recommendation*
- *one designated parking space for Unit IN06 has been relocated within the main car parking area on the Lower Ground Floor*
- *10 x vertical bike parking for staff has been provided in a 5.4m long x 2.7m wide secure room/enclosure adjacent to the café parking space*
- *the visitor bike parking has been relocated from the First Floor to the Lower Ground Floor*
- *2 motorcycle parking bays have been provided on the First Floor*
- *the unisex WC has been relocated closer to the Café*

In addition, I can confirm that the revised vehicular access, car parking, and loading dock arrangements have been designed generally in accordance with the relevant requirements of the Standards Australia publication AS2890.1, AS2890.2, AS2890.3, and AS2890.6.

Waste Management

Response: We confirm that a commercial waste storage area capable of accommodating 2x 240 litre waste and 2x 240 litre recycling bins for weekly collection by a commercial contractor has been incorporated at ground floor level to service the café.

Contamination

Response: This submission is accompanied by a Detailed Site Investigation and Assessment Report (DSI) and Remediation Action Plan (RAP) prepared by Dr Upsilon Environments.

Easements

Response: We confirm that the existing lots will be consolidated and the existing right-of-way over Lot 15 extinguished.

Operational Management Plan

Response: We are of the opinion that the preparation of an Operational Management Plan is unreasonable and unnecessary given that the exact operational characteristics of future tenants including staff numbers and proposed hours of operation is unknown and in circumstances where the subject property is not located within proximity of any residential receivers. No objection would be raised in relation to the imposition of standard conditions pertaining to operational noise.

Café Use

Response: We confirm that there will be no cooking facilities requiring mechanical exhaust within the café. We anticipate that the majority of food will be prepared off-site and heated up as required.

Whilst an indicative Café layout has been provided on the plans the fit-out and use of the café will be subject to separate approval.

Having given due consideration to the matters pursuant to Section 4.15(1) of the Environmental Planning and assessment Act, 1979 as amended, it is considered that there are no matters which would prevent Council from granting consent to the subdivision sought in this instance.

Please not hesitate to contact me to discuss any aspect of this submission.

Yours faithfully

Boston Blyth Fleming Town Planners

A handwritten signature in black ink, appearing to read 'Greg Boston', with a stylized flourish at the end.

Greg Boston

B Urb & Reg Plan (UNE) MPIA
Director

Attachment 1 RFI/ DSAP Response

Item	Comment from DSAP Report / Council RFI	F&J's response
A)	DSAP Report and Urban Design	
	Refer to DSAP Meeting Report dated 24 April 2025	
1)	Strategic context, urban context: surrounding area character	
a)	Existing easement on 35 Carter Street is not identified	Existing easement on 35 Carter Street will be extinguished after the lots of 35 to 39 Carter Road consolidated. This issue will be address in amended SEE
b)	Streetscape analysis	Streetscape Elevation is attached
c)	Setback along Carter Road	4.5m setback is provided for new building on 37 - 39 Carter Road
d)	Streetscape public domain interface	
i	West Street	1.5-metre-wide pedestrian pathway is provided along the West Street frontage
ii	Carter Road building entries	Accessible ramping is now provided from highest point of the site along Carter Road to minimize ramp length. Planters are integrated along the ramp frontage to reduce its visual impact and enhance streetscape amenity.
e)	Include a recognition and design Response to Country	This issue will be address in amended SEE
2)	Scale, built form and articulation	
a)	Adaptive reuse - whether the intended brickwork and structure will retain its integrity due to the extent of changes	Existing building at 35 Carter Road comprises a column-and-beam structure with brick infill walls. All proposed window openings are limited to the infill brickwork only; therefore, the primary structural elements will remain unaffected.
b)	Consideration might be given to another use for part or all of this outdoor space, e.g. break-out area with a pergola	Seating amenity is now provided at the street level, and making use of the outdoor amenity provided by the café
3)	Access, vehicular movement and car parking	
a)	Accessible paths of entry to tenancies IN01 and IN 04 Mezzanine	Addressed in Item 1.d.ii above
b)	Lower Ground tenancies' pedestrian accessibility to be clarified for IN 04, IN 05 and IN06	This issue had been addressed in Access Assessment Report prepared by East Coast Accessibility Pty Ltd dated 9 Decemembr 2024
c)	Car park ramp duplication - Opportunities to relocate the Level 1 car park driveway to a higher point of the site along West Street	The existing building at 35 Carter Road need to be retained. Therefore, the ramp to Level 1 cannot relocate to West Street
d)	The proposed side-by-side location may introduce some confusion for tenancy access	Clear directional signs will be provided at vehicular entrance along Carter Road
4)	Landscape	
a)	The Panel notes the sought 0.5m departures from the DCP min 4.5m along Carter Road in context of proposed zero setbacks along West Street	4.5m setback is provided for new building on 37 - 39 Carter Road
b)	Deep soil landscape	Small planters on Ground Level have been grouped to become bigger planters
c)	Opportunities to increase street tree planting in West Street	Permeable paving will be used terrace in front of Café Street planting proposal as per landscape plan prepared by Ground Ink Landscape Architect dated 22 November 2024 had been supported by Council Landscape Officer
d)	Upper-level window box planters	Adequate soil and irrigation will be provided to ensure long-term and consistent plant health at upper-level window box planters
e)	Small area for seating on Level 1	Addressed in item A.2.b above
f)	Planter on Level 1	Planter on Level 1 is enlarged after removing the seating amenity
5)	Amenity	
a)	Daylight and ventilation into Lower Ground tenancies	Sufficient mechanical ventilation and artifical light will be provided for inductrial units on Lower Ground
b)	Location of a WC for Café	WC on Lower Ground had been relocated closer to Café
c)	Accessibility	Addressed in item 3.a above
d)	Solar protection	Issues had been addressed by Section "J" Assessment Report prepared by Building & Energy Consultants Australia dated 28 October 2024 Rev. A
6)	Façade treatment/Aesthetics	
a)	Signage	Tenancy signages shown are indicative only, further council submission will be lodged for final layout.
7)	Sustainability	
a)	Larger openings currently indicated will require overly complicated engineering to ensure the stability of the walls.	Addressed in item A.2.a above
b)	Rooftop PV	To be addressed in Construction Certificate Stage
c)	Provision for EV charging, battery storage and implications for substation requirements	EV charging points had been indicated on plans. ASP2 Design for upgrading Substation S16948 prepared by Simplex Engineering dated 28 August 2024 had been approved by Ausgrid. Drawings are attached for reference
c)	The solar impact of the glazing needs to be assessed to ensure a sustainable internal environment	Addressed in item A.5.d above
d)	Natural daylight and ventilation	Addressed in item A.5.a & d above

B)	Request for Information from Northern Beaches Council	
	Refer to Northern Beaches Council's letter dated 29 May 2025	
1)	DSAP Report and Urban Design	
a)	Comments from DSAP Meeting Report dated 24 April 2025	Addressed in Item A above
2)	Car Parking, Access and Traffic	
a)	Access	
i)	Street Parking along West Street	One kerb extension on the West Street as marked has been removed, in order to add an additional parking space with min. 2.5m in width.
ii)	The design layout of the end of the ramp on proposed Lower Ground Floor, Drawing No.3857 DA 110 Issue A.	The ramp layout has been updated and its compliance confirmed by the Traffic Engineer
iii)	Driveway Profiles Drawing No.C07-0001, with Chainage 14.72	Will be updated in final amendment submission
iv)	Improve visibility at access ramp to the First-Floor level	Convex mirror added on First Floor near the top of ramp
v)	Parking provision of Unit IN10	Layout of Parking P17, P18 and P19 have been updated next to Unit IN10
vi)	Car Parking Facilities	
1)	Proposed changes of street parking	The proposal to change the existing parking in West Street to create 1 additional space and introduction of timed parking restrictions will be report to the Northern Beaches Local Traffic Committee for consideration
2)	Parking for Unit IN06 on Lower Ground Floor	One designated parking space for Unit IN06 has been relocated within the main car park area on the Lower Ground Floor
vii)	Bicycle Parking and End of Trip Facilities	
1)	Bicycle Parking for Staff	Secure Bike Parking with 10 vertical bicycle parking spaces had been provided
2)	Bicycle Parking for Visitor	Visitor Bike Parking with 4 bicycle parking racks has been relocated from First Floor to Lower Ground Floor
3)	Motorcycle Parking	2 motorcycle parking bays (2.5m long x 1.2m wide) have been provided on First Floor
4)	Toilet for Café	Unisex Toilet had been relocated close to Café, which also make room for bike parking and garbage room
3)	Waste Management	
1)	Commercial waste storage room	Garbage store for Café, which capable to hold 2x 240 litre and 2x 240 litre recycling bins, has been provided on Lower Ground Floor
4)	Contamination	
1)	Detail Site Investigation (DSI)	Detail Site Investigation (DSI) and Remediation Action Plan (RAP) are provided in amended DA submission
5)	Easements	
1)	Existing easement on 35 Carter Street	Existing easement on 35 Carter Street will be extinguished after the lots of 35 to 39 Carter Road consolidated. This issue will be address in amended SEE
6)	Insufficient information	
1)	Operational Management Plan	This issue will be address in amended SEE
2)	Café Use	<p>Proposed Café is a take-away shop with no on-site cooking or food preparation. Details will be address in amended SEE</p> <p>Cafe layout shown is indicative and for reference only. Final layout to be lodged under separate submission for council approval. All fit-out and construction of cafe shall comply with AS 4674 - 2004 design, construction and fit-out of food premises and with standard 3.2.3 of the Australian and New Zealand food standards code under the food act 2003.</p>