



Statement of Environmental Effects

Dee Why RSL Stage 7 DA
932 Pittwater Road, Dee Why

Prepared for Dee Why RSL
Submitted to Northern Beaches Council
14 February 2025

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Contents

1	Introduction.....	6
1.1	Report structure	6
1.2	Consent authority.....	8
1.3	Pre-lodgement meeting with Council	8
2	The site and locality	14
2.1	Site description	14
2.2	Surrounding locality	15
2.3	Site history	16
3	The proposal	18
4	Statutory planning framework	24
4.1	Environmental Planning and Assessment Act 1979	24
4.2	Coastal Management Act 2016	26
4.3	Rural Fires Act 1997	27
4.4	Environmental Planning and Assessment Regulation 2021	28
4.5	State Environmental Planning Policies	28
4.6	Warringah Local Environmental Plan 2011	29
4.7	Warringah Development Control Plan 2011	34
4.8	Contributions.....	34
5	Environmental planning assessment	35
5.1	Built form and visual impacts	35
5.2	Access	42
5.3	Public domain and landscaping	43
5.4	Traffic and transport.....	44
5.5	Noise and vibration	45
5.6	Heritage	47
5.7	Flood	48
5.8	Fire.....	48
5.9	Civil	48
5.10	Waste management.....	49
5.11	Economic and socio-economic	49
5.12	Construction management	50
5.13	Suitability of the site	50
5.14	Submissions	50
5.15	Public interest	50
6	Conclusion.....	51

Figures

Figure 1: the site location (Base source: Near maps)	14
Figure 2: Surrounding locality (Base source: Nearmaps)	15
Figure 3: Proposed Level 1 layout (Source: Altis Architecture)	20
Figure 4: Proposed Level 2 layout (Source: Altis Architecture)	20
Figure 5: Proposed Level 3 layout (Source: Altis Architecture)	21
Figure 6: Proposed Level 5 layout (Source: Altis Architecture)	21
Figure 7: Proposed demolition on northern elevation (Source: Altis Architecture)	22
Figure 8: Proposed works on northern elevation (Source: Altis Architecture)	22
Figure 9: Proposed demolition on western elevation (Source: Altis Architecture)	22
Figure 10: Proposed works on western elevation (Pittwater Road) (Source: Altis Architecture)	23
Figure 11: 12m Height plane based on natural ground level (Source: Altis Architecture)	23
Figure 12: Coastal Environment Area map (Source: Spatial Viewer)	27
Figure 13: Bushfire prone land (Base source: Northern Beaches Council	27
Figure 14: Site zoning (Base source: Espatial viewer)	30
Figure 15: Site 9 additional permitted uses (Base source: Espatial viewer)	30
Figure 16: Height of buildings (Base source: Espatial viewer)	31
Figure 17: Heritage mapping (Base source: Espatial viewer)	32
Figure 18: Flood map (Base source: Council flood map)	34
Figure 19: Existing western elevation (Source: Google Maps)	35
Figure 20: Proposed entry on Pittwater Road (Source: Altis Architecture)	36
Figure 21: Existing Clarence Avenue Entry (Source: Altis Architecture)	36
Figure 22: Central portion of the western facade (Source: Altis Architecture)	37
Figure 23: Existing podium indicated by the red line (Source: Altis Architecture)	38
Figure 24: Proposed podium with setback to façade (Source: Altis Architecture)	38
Figure 25: Level 2 existing and demolition plan (Source: Altis)	39
Figure 26: Level 2 proposed plan (Source: Altis Architecture)	40
Figure 27: outline of proposed facade on the western elevation (Source: Altis Architecture)	41
Figure 28: 12m height plane based on natural ground level (Source: Altis Architecture)	41
Figure 29: Proposed landscaping on Hawkesbury Avenue (Source: Altis Architecture)	43
Figure 30: Proposed landscaping on Pittwater Road (Source: Altis Architecture)	43
Figure 31: Existing landscaping on Pittwater Road	44
Figure 32: Surrounding receivers (Source: RWDI Australia)	45
Figure 33: Noise monitoring locations (Source: RWDI Australia)	46
Figure 34: View from the site on Pittwater Road (Source: Google Maps)	47
Figure 35: View from the site on Clarence Avenue (Source: Google Maps)	48

Tables

Table 1: Report structure	7
Table 2: List of appendices	7
Table 3: Summary and response to issues raised in Pre lodgement meeting with Council.....	13
Table 4: Previous development applications and approvals	17
Table 5: Project overview	18
Table 6: Objectives of the EP&A Act	25
Table 7: Section 4.15(1) assessment	26
Table 8: Transport and Infrastructure SEPP – relevant provisions	29
Table 9: Other matters	33
Table 10: Recommended waste management (Source: Waste Audit GFA Consulting Group) ..	49

1 Introduction

This Statement of Environmental Effects (SEE) has been prepared by Keylan Consulting Pty Ltd (Keylan) on behalf of Dee Why RSL to accompany a development application (DA) for internal and external alterations and additions to the existing registered club at 932 Pittwater Road, Dee Why.

The proposed works largely relate to the reconfiguration of the gaming room, café and bistro. In addition, plant/mechanical works are proposed along with an extension of the northern part of the building on Level 2 to enclose the existing outdoor area.

This SEE has been prepared and is submitted to Northern Beaches Council pursuant to the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This SEE describes the site, its surroundings and the proposed development. It provides an assessment of the proposals in terms of the matters for consideration under section 4.15(1) of the EP&A Act.

This SEE demonstrates that the proposal is generally consistent with the relevant provisions of the following:

- *EP&A Act*
- *Environmental Planning and Assessment Regulation 2021 (EP&A Regulation)*
- *Coastal Management Act 2016*
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP).*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *Warringah Local Environmental Plan 2011 (WLEP 2011)*
- *Warringah Development Control Plan 2011 (WDCP 2011)*

This SEE concludes that the proposal will provide substantial net benefits to future residents and the broader community and not result in any significant environmental impacts.

We recommend that the Council approve the development application subject to the content and findings outlined in this SEE.

1.1 Report structure

The SEE has been prepared in line with the requirements of Part 4 of the EP&A Act. The structure of the report is as follows:

Section	Overview
1. Introduction	Introduction to the SEE.
2. Site and locality	A description of the site, the context and an assessment of the opportunities and constraints presented by the site.
3. The proposal	A detailed description of the proposed development application
4. Statutory planning context	A detailed review of the proposal against relevant statutory planning legislation.

Section	Overview
5. Environmental planning assessment	An in-depth assessment of the relevant planning controls, existing environment, proposal and potential impacts and public benefits arising from the proposed development application.
6. Conclusion	A concluding statement taking into account the assessment of the proposal and a recommended course of action with regard to the determination of the application.

Table 1: Report structure

This SEE should be read in conjunction with the following supporting documents:

Appendices	Supporting documentation
Appendix 1	Estimated Development Cost
Appendix 2	Clause 4.6 Application
Appendix 3	Warringah Development Control Plan 2011 assessment
Appendix 4	Traffic and Parking Assessment
Appendix 5	Architectural Plans
Appendix 6	BCA Assessment Report
Appendix 7	Landscape Package
Appendix 8	Letter of Compliance Waste Planning Letter
Appendix 9	Operational Waste Management Plan
Appendix 10	Demolition and Construction Waste Management Plan
Appendix 11	Noise and Vibration Impact Assessment
Appendix 12	Access Report
Appendix 13	Fire Safety Strategy
Appendix 14	Operational Plan of Management
Appendix 15	Architectural rationale
Appendix 16	Fire Engineering Letter of Support
Appendix 17	Boundary Survey
Appendix 18	Civil Plans
Appendix 19	On Site Detention Checklist
Appendix 20	Building Services Engineering Section J Report

Table 2: List of appendices

1.2 Consent authority

The cost of works for the purpose of determining the DA fee for the proposal is calculated in line with Part 9, Division 2, Clause 208(1) of the EP&A Regulation at \$ 10,732,865 including GST (Appendix 1).

1.3 Pre-lodgement meeting with Council

A pre-lodgement meeting was held with Council on 31 August 2023 to discuss key issues associated the previously proposed scheme which included alterations and additions to the existing club and addition of a childcare centre (PLM2023/0104).

Following the meeting, the architectural plans were redesigned to remove the previously proposed childcare centre. As noted above, the current scheme only proposes alterations and additions to the existing Club.

A summary of the matters raised relating to the alterations and additions and responses and provided below.

Issue raised - previous design	Response - changes to revised design	Section in SEE
<i>Any future application will be referred to TfNSW for comment.</i>	Noted, however the proposed alterations and addition do not propose significant changes that increase the size of the premise pursuant to Section 2.122 of the Transport and Infrastructure SEPP.	N/A
<i>The proposed development is located within the coastal zone of NSW and is subject to the provisions of the Coastal Management Act 2016 (CM Act) and State Environmental Planning Policy (Resilience and Hazards) 2021 (SEPP R&H). Under SEPP R&H the subject site (in part) has been included on the Coastal Environment Area Map and Divisions 3 and 5 of SEPP R&H will be relevant to any development proposed. Any future development application must address in the Statement of Environmental Effects (SEE) document the objectives and requirements of both the CM Act and the CM SEPP (Divisions 3 and 5) as they relate to development within that coastal management area.</i>	Noted. Addressed in Section 4.5 of the SEE.	4.5

Issue raised - previous design	Response - changes to revised design	Section in SEE
<p><i>The proposed breach of the height development standard is significant. The applicant notes that there are other areas of height breach as demonstrated on the height plane overlay. A search of Council records confirms that the height breach under the most recent consent DA2017/0244 relates to skylights and plant. The portions of the building that currently breach the height limit are generally minor elements positioned in the centre of the site setback from the side boundaries.</i></p> <p><i>By comparison the proposal will result in a significant area (footprint) of the building that will breach the height limit by 27.5%. The breaching element is located at the south-western corner of the site and will be visually prominent as observed from Hawkesbury Avenue and Pittwater Road. The excessive 6m floor to ceiling height of the gaming areas adds to the height breach. The proposal is inconsistent with the objectives of the height of building development standard as it will result in a building that is not compatible with the 3-storey height and scale of surrounding and neighbouring development to the south. The proposal will have a visual impact on the streetscape as it adds to the visual bulk of the development. Further the proposal has the potential to result in disruption of views.</i></p> <p><i>Concern is raised at the ability of to demonstrate sufficient environmental planning grounds to justify contravening the development standard by way of a Clause 4.6 variation to the height of building development standard.</i></p>	<p>The revised design proposes to vary the height control by 4m when measured from natural ground level or 5.05m when measured from ground level existing (using Merman methodology). A Clause 4.6 Request is provided at Appendix 2 which provides extensive justification for this variation including:</p> <ul style="list-style-type: none"> the proposed height exceedances are limited to a skylight, plant and stair over runs and account for approximately 1.9% of the total roof area the proposed height is below the existing height breaches which exceed the 12m height plane by 5.98m <p>The gaming floor to ceiling heights have been revised to ensure appropriate heights.</p>	4.6.3 and 5.1
<p><i>Council has adopted the interpretation of ground level (existing) as that established in the matter of Merman Investments Pty Ltd v Woollahra Municipal Council [2021] NSWLEC 1582...</i></p>	<p>Noted. Addressed within the Clause 4.6.</p>	Appendix 2
<p><i>Clause 5.21 Flood Planning and 5.22 Special flood considerations - The site is mapped as flood affected.</i></p>	<p>Both flooding and heritage are addressed within this SEE.</p>	5.7 and 5.6

Issue raised - previous design	Response - changes to revised design	Section in SEE
<i>Clause 5.10 Heritage conservation – The site is located in proximity to Dee Why Lagoon and Reserve. The SEE shall include an assessment against clause 5.10.</i>		
<p>WDCP 2011 - Part G6(1) & D9</p> <p><i>The proposed extension relates to the south-west portion of the site. The proposal is assessed as being inconsistent with the objectives of the control. The surrounding residential development along Hawkesbury Avenue is three storeys. The proposal fails to provide a transition to the scale of the surrounding residential development. The proposal does not complement the surrounding or provide a suitable urban design solution.</i></p>	The revised design proposes minor alternations and additions to the external buildings and does not propose substantial changes to the existing external building envelope. Importantly, the proposed height exceedance is below the highest part of the building already constructed. The proposed height increases are located on the northern portion of the existing building and therefore minimal impact on the south western neighbours are anticipated.	Appendix 3
<p>WDCP 2011 - Part G6(2)</p> <p><i>The plans submitted with the PLM application are very conceptual however the plans suggest that the proposal complies with this control. Further details are required to confirm compliance.</i></p>	Noted. Detailed architectural plans are provided with the DA.	Appendix 5
<p>WDCP 2011 - Part G6(3)</p> <p><i>The applicant at the PLM meeting confirmed that the proposal includes an extension level 2 beyond the existing building.</i></p> <p><i>The proposal is inconsistent with R2 with the requirements and objectives of the control.</i></p> <p><i>The proposal will result in an unreasonable increase in the scale and bulk as viewed from the northern boundary.</i></p>	An extension of the northern part of the building on Level 2 is proposed to enclose the existing outdoor area. The assessment provided at Section 5 concludes this alteration is appropriate.	5
WDCP 2011 - Part G6(5)	A Clause 4.6 Request is provided at Appendix 2 which provides justification for this variation.	Appendix 2

Issue raised - previous design	Response - changes to revised design	Section in SEE
<i>The increase in the height of the building above the maximum height limit has the potential to impacts on views to the east from surrounding properties. Any future application shall be supported with a view loss assessment that addresses the requirement of this control and clause D7 (Views) of the WDCP in addition to the Planning Principle established by the Land and Environment Court in Tenacity Consulting v Warringah Council (2004) NSWLEC 140. The view loss assessment shall include an assessment of view from properties located along Pittwater Road and Hawkesbury Avenue, including but not limited to 3- 11 Hawesbury Avenue, 749, 753, 755 and 761 Pittwater Road, Dee Why.</i>	It is noted the proposed height exceedance is below the highest part of the building already constructed. The Architectural Plans provided in Appendix 5 include a view loss assessment which demonstrates the height increases are located on the northern portion of the existing building and there will be minimal impact on eastern neighbours.	
WDCP 2011 - Part G6(6) <i>The proposal extends the building beyond the northern boundary. Insufficient information has been submitted to demonstrate compliance with the control. Despite this, concern is expressed about the ability to meet the objectives of the control. The extension of the building adds to the visual bulk does not make an appropriate transition to the surrounding residential area. The extension does not contribute to the public domain and insufficient landscaping is proposed to soften and improve the built edge and façade.</i>	An extension of the northern part of the building on Level 2 is proposed to enclose the existing outdoor area. The assessment provided at Section 5 concludes this alteration is appropriate.	5
WDCP 2011 - Part G6(8) <i>Refer to comments from Council's Transport Engineer below.</i>	See below.	Appendix 4
Advice from Transport Engineer	Due to Council's concerns, a childcare centre has been removed as part of this proposal.	

Issue raised - previous design	Response - changes to revised design	Section in SEE
	<p>Whilst the gaming area is increased in size, the number of gaming machines provided at the site will not change as part of this proposal. Further, the proposal will only result in minor addition to floor space (619sqm) with the resultant FSR for the cumulative development being 1.06:1 (noting there is no FSR for the site).</p> <p>A Traffic Impact Assessment is provided as part of this DA (Appendix 4).</p>	
<i>...the DA must address in the Statement of Environmental Effects (SEE) document the objectives and requirements of both the CM Act and the CM SEPP (Divisions 3 and 5) as they relate to development within that coastal management area.</i>	The CM SEPP (now the Resilience and Hazards SEPP) and Coastal Management Act 2016 are addressed at Section 4.2 of this report.	
<i>Advice from Heritage Officer</i>	Noted.	4.6.4
<i>Advice from Urban Designer:</i> <ul style="list-style-type: none"> The plans supplied show that the proposal is above the height controls. It is unclear where is the maximum height plane measured from. The applicant will need to illustrate the existing and proposed massing in section and elevation and provide 3-dimensional renders of the existing and proposed. The applicant should illustrate the effect on the streetscape. Please provide solar analysis. The applicant should address how the proposal responds to the National Quality Framework, and in Quality Area 3 – Physical environment. 	Noted. These comments have been integrated into the revised design.	5.1

Issue raised - previous design	Response - changes to revised design	Section in SEE
<ul style="list-style-type: none"> • The subject site has a frontage to Pittwater Road, which is a mandated road under SEPP Transport & Infrastructure 2021 (SEPP T&I). Very limited information has been supplied and so it is not possible to give a detailed response. Any proposal will have to address the requirements of SEPP T&I, Development near rail-corridors and busy roads – interim guideline (DNRC&BR) and the WDCP D3 regarding noise and designing for noisy contexts. • It is likely that for any Development Application the applicant will at minimum need to supply: <ul style="list-style-type: none"> ○ Evidence why the floor-to-ceiling of the Gaming Area can't be lower, or at least in part lowered to be within the height control... ○ View analysis to ascertain if there is any view loss from properties to the west of the proposal. ○ Sections that show the existing that is being demolished. Please show where the sections are taken on the plans; the section markers are missing. ○ Elevations showing the streetscapes & context. ○ Street enclosure sections; sections from one building interface with the street all the way to the other side. ○ Show the current extents in plan as a red dotted line on the proposed so we can see if it protrudes forward of the existing buildings. 		

Table 3: Summary and response to issues raised in Pre lodgement meeting with Council

As demonstrated above, this application has been prepared in accordance with the direction discussed at the development application pre-lodgement meeting and the initial response from Northern Beaches Council.

2 The site and locality

2.1 Site description

The site is located at 932 Pittwater Road, Dee Why within the Northern Beaches Local Government Area (LGA). It is legally described as Lot 1 in DP 706230.

The site has an area of approximately 14,830 square metres (sqm).

It is irregular in shape and is located on the eastern side of Pittwater Road and has three frontages as follows:

- 180m primary street frontage to Clarence Avenue to the east
- 100m frontage to Hawkesbury Avenue to the north
- 110m frontage to Pittwater Road to the west

Existing development at the site currently comprises a registered club, bowling centre and multi-level parking with 680 car spaces.

The location of the site is shown at Figure 1 below and a site boundary survey is provided at Appendix 17.



Figure 1: the site location (Base source: Near maps)

2.2 Surrounding locality

The locality is characterised by a variety of uses, including commercial, residential and recreational. A breakdown is provided below:

- East: the site borders Clarence Avenue to the east. The predominant housing typology along Clarence Avenue is medium density, 3-4 storey residential flat buildings.
- South: a childcare centre (Dee Why Kindergarten), seniors living (Ocean Grove) and two 3 storey residential flat buildings directly adjoin the site to the south. Further south is the Dee Why Town Centre which comprises a shopping centre (Dee Why Village Plaza) and high density mixed use buildings.
- West: The site adjoins Pittwater Road to the west. A mixture of older style and newer medium density residential buildings with a mix of retail and commercial premises are located along this road.
- North: The site adjoins Hawkesbury Avenue to the north. A 7 Eleven service station and medium density residential flat buildings are located along this road.

The site context is shown in Figure 2 below.

There are two local heritage items, and one heritage conservation area located in proximity to the site as outlined below:

- Dee Why Public Library (I50) - 170m south
- Civic Centre Landscaping (I137) - 200m south
- Dee Why Lagoon and Reserve Heritage Conservation Area (C5) - 80m north east



Figure 2: Surrounding locality (Base source: Nearmaps)

2.3 Site history

Previous development applications/approvals for the subject site are as shown in the table below.

Subject site DA	DA summary	Decision
DA 2001/0394	Five stage Master Plan for the site and Stage 1 works.	Approved (17/07/2001)
DA 2005/0292	Development of Stage 2 to existing RSL Club, including alterations and additions to club building, additional carparking and amendment to the site Master Plan.	Approved (31/03/2005)
DA 2008/0997	Amendments to the Dee Why RSL Club Master Plan to include a new Development Stage 2.5, including provision of a partially enclosed area with a large internal courtyard at the North-West portion of the Club and refurbishment of the existing café to provide for a new outdoor gaming area.	Approved (3/06/2009)
DA 2009/0822	Alterations and additions to an existing club for a new outdoor gaming terrace including reconfiguration of an existing kitchen, toilets and changes to the club entry area.	Approved (18/09/2009)
DA 2011/1335	Alterations and additions to the Club including extension of outdoor gaming facilities, refurbishment of Level 3 function facilities, relocation of entrance foyer, internal alterations including rationalisation of dining areas and upgrade of the Pittwater Road façade. A concurrent amendment to the Masterplan was sought.	Approved (29/03/2012)
DA 2015/0603	Replacement of the north-east roof over level 2 of the club as well as an upgrade to the internal entry to this part of the club, internal refurbishment of the existing Flame cabana and minor façade alterations to suit new roof.	Approved (28/08/2015)
DA 2015/1230	Replacement of the north east roof over level 2 of the Dee Why RSL Club as well as an upgrade to the internal entry to this part of the club, internal refurbishment of the existing Flame cabana and minor façade alterations to suit the new roof.	Approved (05/05/2016)
DA 2017/0244	Demolition works and redevelopment of part of an existing registered club.	Approved (31/07/2017)

Subject site DA	DA summary	Decision
DA 2017/0969	Alterations and additions to the existing registered club. Stage 5 works including internal alterations to convert the existing sports bar to a restaurant and the restaurant into the sports bar together with a new pergola and landscaping over the internal courtyard at the eastern terrace	Approved (20/11/2017)
DA 2021/0388	Alterations and additions to the existing RSL club and specifically seeks to open up a wall in the existing back of house area used for staff recreation to create a terrace which would provide for improved amenity, solar access and ventilation.	Approved (12/05/2021)

Table 4: Previous development applications and approvals

3 The proposal

The proposed development is described in the table below:

	Comments
Description	Internal and external alterations and additions
Ownership	Dee Why RSL
Local government area	Northern Beaches
Zoning	R3 - Medium Density Residential
Permissibility	The existing registered club and recreation facility (indoor) is permissible with consent pursuant to Schedule 1 Part 9 of the WLEP 2011. The proposed works are ancillary to the existing permissible uses and therefore permissible with consent.
Project elements	<p>The proposed internal and external alterations and additions comprise:</p> <ul style="list-style-type: none"> external additions: <ul style="list-style-type: none"> new stairs and ramps to facilitate access along Hawkesbury Avenue new awnings external alterations <ul style="list-style-type: none"> relocation of the entry on Pittwater Road further south to improve accessibility new roof and roof skylight/glazing landscaping façade upgrade new plant internal alterations within levels 1, 2, 3 and 5: <ul style="list-style-type: none"> extending the northern part of the building on Level 2 to enclose the existing outdoor area modifying the layout of level 2 to facilitate a new café, consolidation of gaming areas and expansion of a restaurant area plant and mechanical works new stairs and ramps roof extensions relocation of amenities internal additions to level 3: <ul style="list-style-type: none"> inclusion of a new communications room

Table 5: Project overview

Dee Why RSL (the Club) is currently experiencing extensive demand, which it cannot meet using the existing premises. The proposed upgrades seek to facilitate the ongoing operation of the Club by enabling more efficient operations and economic use of the land to better cater to its 77,000 members and the public.

The upgrades comprise external and internal alterations and additions as described within Table 5 above and below. The extent of works are shown within the Architectural Plans (Appendix 5) and detailed rationale is provided within (Appendix 15).

No changes are proposed to the Clubs hours of operation.

Internal alterations and additions

The works require a minor increase in Gross Floor Area (GFA) from 15,208 square meter (sqm) to 15,827sqm (total 619sqm) which is predominantly located on level 2 to allow the gaming area to be moved further north and allow additional food and beverage space in the south west corner of the building. = and a small amount is located on level 3 to facilitate a new communication room. Importantly, the GFA increase is contained entirely within the existing building footprint.

As discussed in Section 5 and the Operational Plan of Management (Appendix 14), the proposed development will not result in any changes to the operating hours or number of gaming machines. The Club's operations will continue in accordance with the existing liquor and gaming license. It is noted:

- 8 additional staff are required to service the restaurant expansion
- the Club's patronage capacity will increase by 64 patrons

The proposed works are shown in the Architectural Plans prepared by Altis Architecture (Appendix 5). Extracts of the internal layouts are provided within the figures below.

All proposed works will be in accordance with the Building Services Engineering Section J Report (Appendix 20).



Figure 3: Proposed Level 1 layout (Source: Altis Architecture)

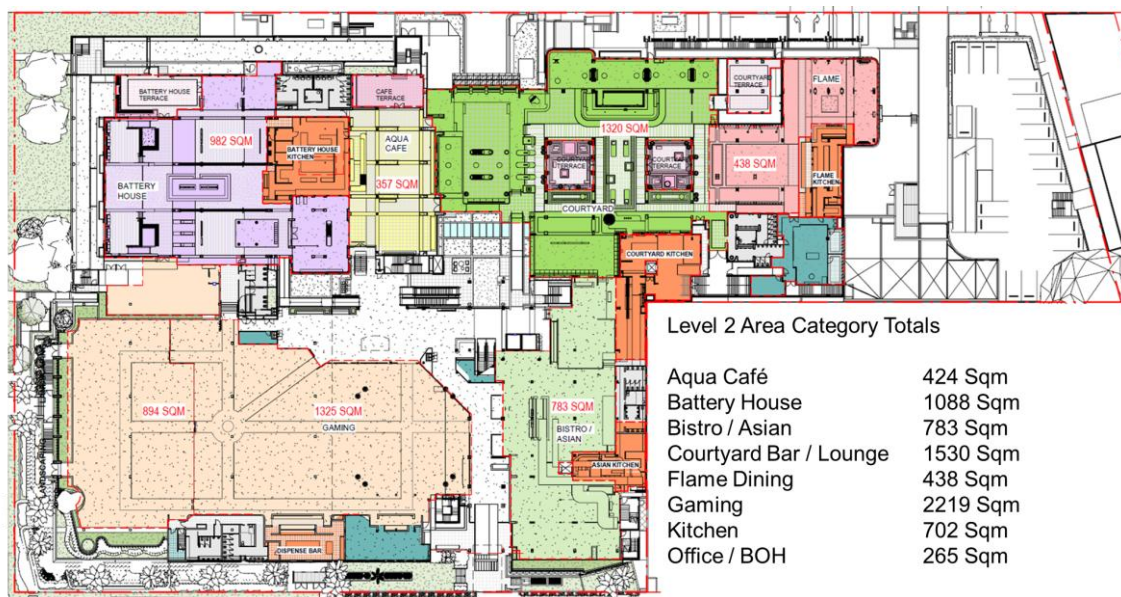


Figure 4: Proposed Level 2 layout (Source: Altis Architecture)

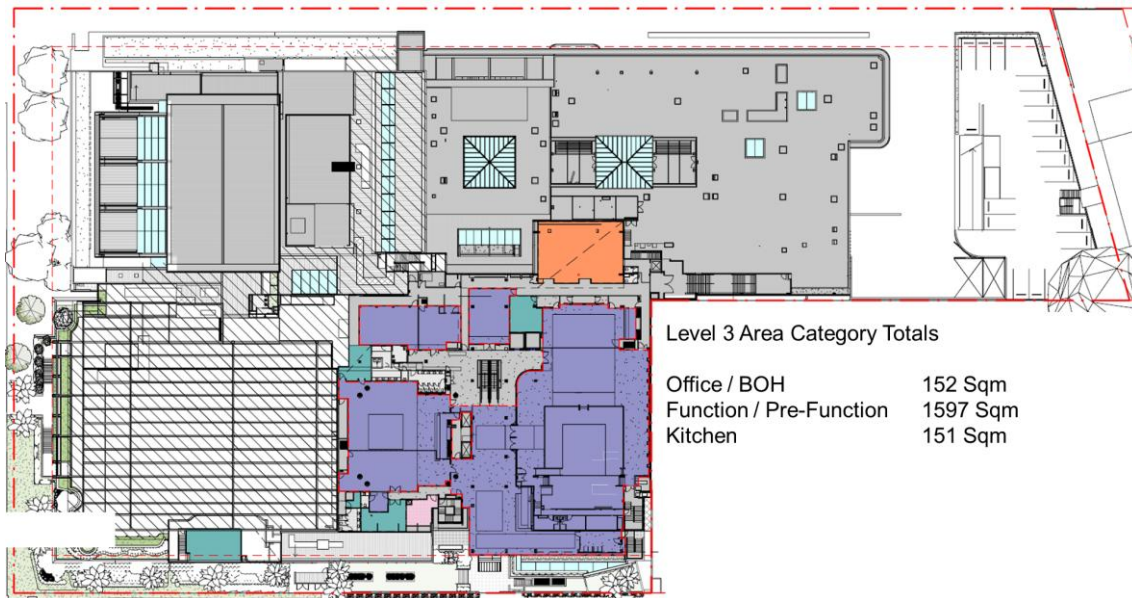


Figure 5: Proposed Level 3 layout (Source: Altis Architecture)

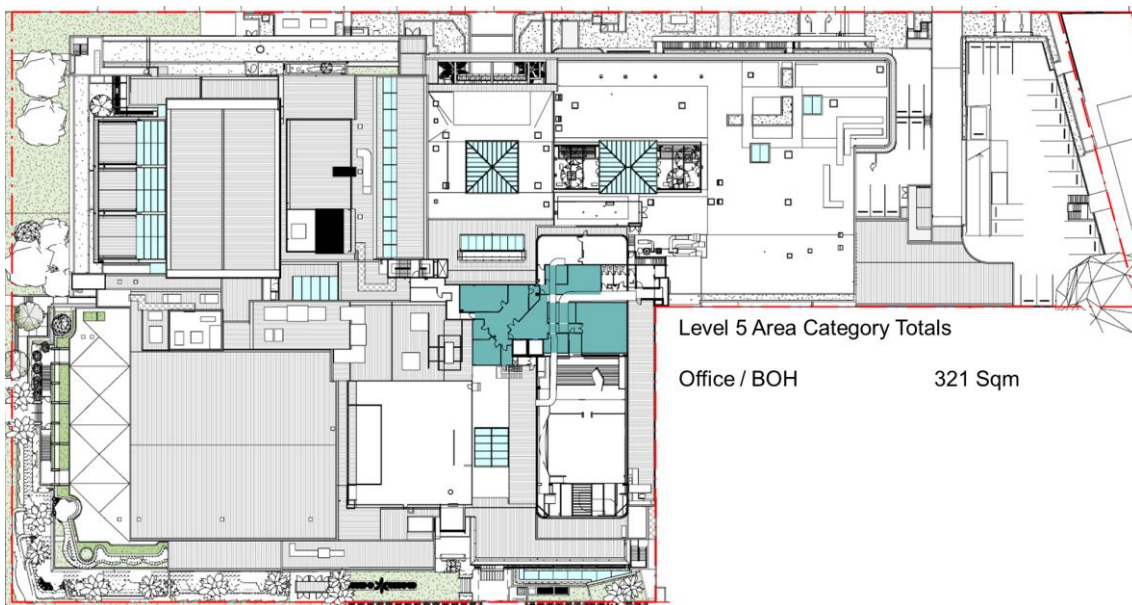


Figure 6: Proposed Level 5 layout (Source: Altis Architecture)

External alterations and additions

The external alterations and additions occur on the northern and western elevations. The extent of these works is demonstrated within the figures below. Red areas indicated demolition works whilst yellow area indicates the areas for external alterations and additions, including upgrades to the façade which include decorative screening and wall cladding with protruding nibs and recesses to provide visual relief from the street

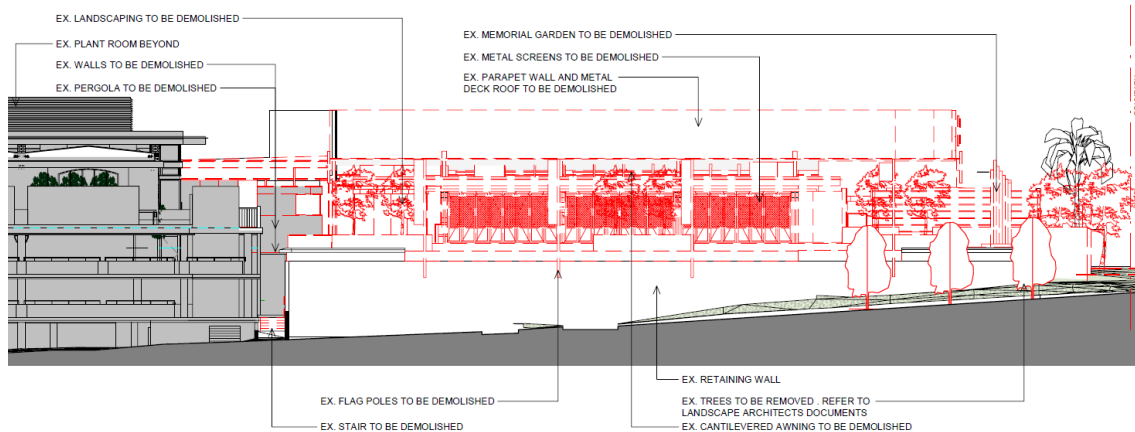


Figure 7: Proposed demolition on northern elevation (Hawkesbury Avenue) (Source: Altis Architecture)

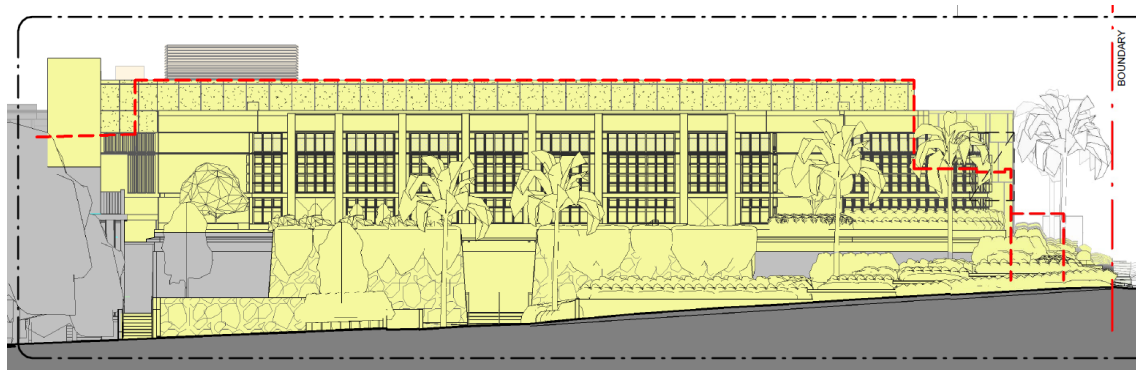


Figure 8: Proposed works on northern elevation (Hawkesbury Avenue) (Source: Altis Architecture)

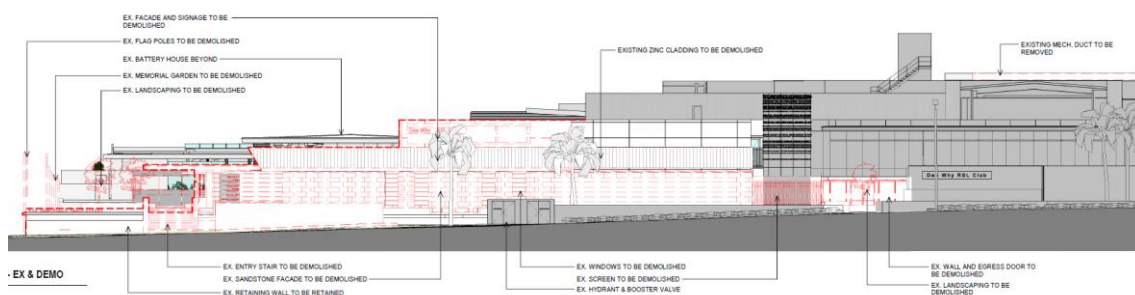


Figure 9: Proposed demolition on western elevation (Pittwater Road) (Source: Altis Architecture)

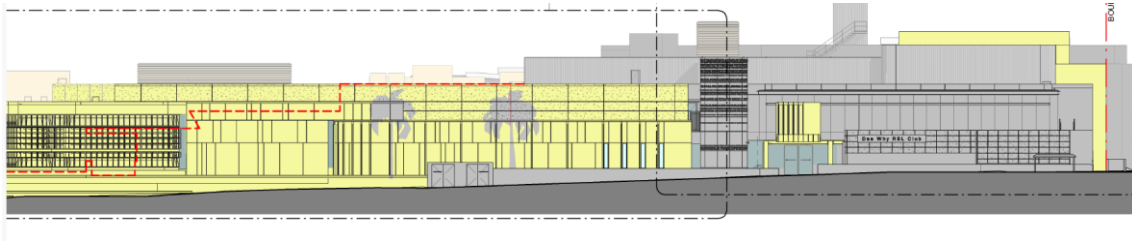


Figure 10: Proposed works on western elevation (Pittwater Road) (Source: Altis Architecture)

The proposal does include new plant on the roof which results in height non-compliances on the northern section of the roof (maximum 5.05m). These are indicated by the yellow shaded areas on the figure below.

Importantly, the development has existing height non compliances which are indicated by the blue shaded areas.

A clause 4.6 application has been prepared to support the DA and justify the proposes exceedances (Appendix 2).

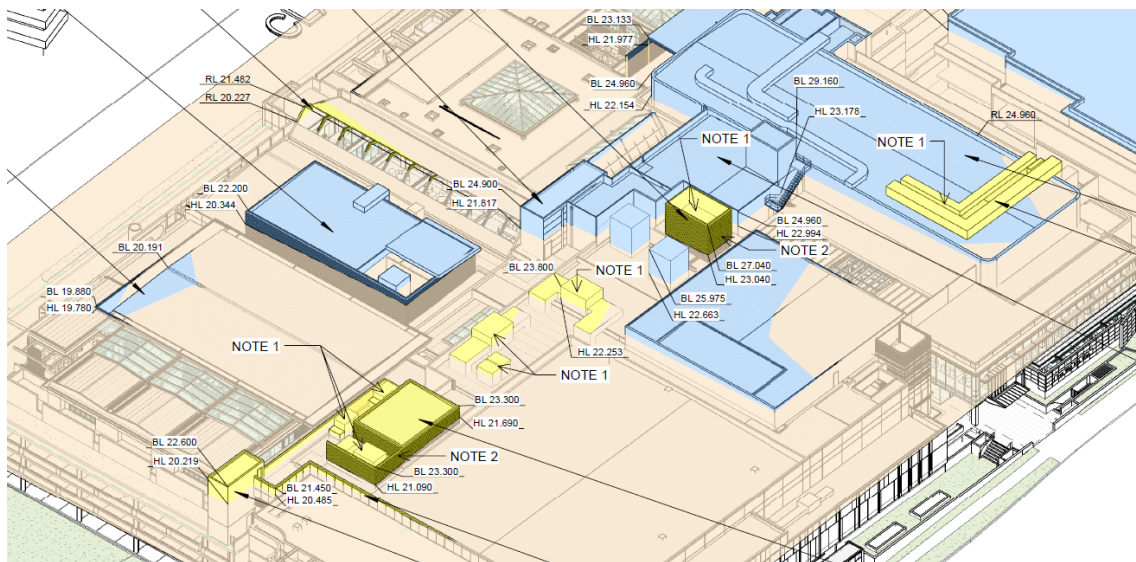


Figure 11: 12m Height plane based on natural ground level (Source: Altis Architecture)

4 Statutory planning framework

4.1 Environmental Planning and Assessment Act 1979

4.1.1 Objects of the Act

The proposal is consistent with the objects of the EP&A Act as it is considered to promote the orderly and economic use and development of land without resulting in an adverse impact on the environment. Detailed assessment against the objects of the EP&A Act is provided below.

Objects of the Act	Comment
a. <i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i>	The proposal enables the club to facilitate more efficient social and economic use of the land by: <ul style="list-style-type: none"> • refurbishing the interior and exterior of a local club which acts as a common social meeting place for local residents • improving accessibility
b. <i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</i>	This SEE provides information on the relevant economic, environmental and social impacts of the proposed development to enable the consent authority to undertake a thorough environmental assessment and assist in its decision-making on the application.
c. <i>to promote the orderly and economic use and development of land</i>	The proposal promotes the orderly and economic use of the land by allowing the existing Club to make improvements to facilitate more efficient operations and activity.
d. <i>to promote the delivery and maintenance of affordable housing</i>	N/A - the existing use is being retained and does not comprise residential.
e. <i>to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats</i>	N/A - the site does not comprise land of high biodiversity value.
f. <i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)</i>	The site is not a heritage item. It is noted several heritage items are located nearby the site. However as discussed in sections 4.6.4 and 5.6, the proposal will not result in any adverse heritage impacts.

Objects of the Act	Comment
<i>g. to promote good design and amenity of the built environment</i>	Whilst the majority of the works are internal alterations, the proposed external changes promote good design and amenity in regard to its urban design and responsiveness to the topography and local context. Further assessment is provided at Section 5.
<i>h. to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants</i>	The development will be constructed in line with any conditions of approval issued by the consent authority and the relevant requirements that relate to health and safety, construction and maintenance.
<i>i. to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State</i>	This development application will be submitted to and assessed by Council.
<i>j. to provide increased opportunity for community participation in environmental planning and assessment.</i>	The proposal will be notified in accordance with the Council's notification policy.

Table 6: Objectives of the EP&A Act

4.1.2 Section 4.15 Matters for Consideration

This section of the report provides the planning assessment against the key statutory environmental planning instruments and Development Control Plans relevant to the proposal.

The following detailed assessment of the proposal is based on the heads of consideration contained in section 4.15 of the EP&A Act.

Provision	Consideration
<i>a. the provisions of</i>	
<i>i) any environmental planning instrument</i>	The relevant environmental planning instruments are addressed at Section 4.
<i>ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved)</i>	The relevant proposed environmental planning instruments are addressed at Section 4.

Provision	Consideration
iii) <i>any development control plan</i>	The WDCP 2011 is addressed at Section 4.7.
(a) <i>any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4</i>	N/A
iv) <i>the regulations (to the extent that they prescribe matters for the purposes of this paragraph),</i>	The requirements of the EP&A Regulations are addressed in Section 4.
v) <i>Repealed</i>	N/A
b. <i>The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts of the locality</i>	The impacts of the proposal are addressed in Section 5.
c. <i>the suitability of the site for the development</i>	Site suitability is addressed at Section 5.
d. <i>any submissions made in accordance with this Act or the regulations</i>	Any submissions made on this subject development application will be duly considered and addressed by Keylan. In addition, the Council will consider any public submissions relating to the proposal during its assessment.
e. <i>the public interest.</i>	Public interest is addressed at Section 5.

Table 7: Section 4.15(1) assessment

4.2 Coastal Management Act 2016

The *Coastal Management Act 2016* applies as the site is identified in Section 2.4(4) of the Resilience and Hazards SEPP as a 'coastal environment area', see Figure 12 below.

On this basis, the proposal is required to comply with the management objectives listed at Section 8(2) in the *Coastal Management Act 2016*.

The proposal has been assessed against these objectives. Given the nature of the development, specifically that there is no increase to the building footprint, there will be no additional impact to the coastal environment from what is existing.



Figure 12: Coastal Environment Area map (Source: Spatial Viewer)

4.3 Rural Fires Act 1997

Division 8, subdivision 2 of the *Rural Fires Act 1997* outlines the requirements for development on bushfire prone land for specified uses (residential purposes and special fire protection purposes).

As shown within Figure 13 below, a small portion of the northeastern corner of the site is identified as bushfire prone land. However, registered clubs and recreational uses are not identified as a specified purpose and therefore this subdivision does not apply.

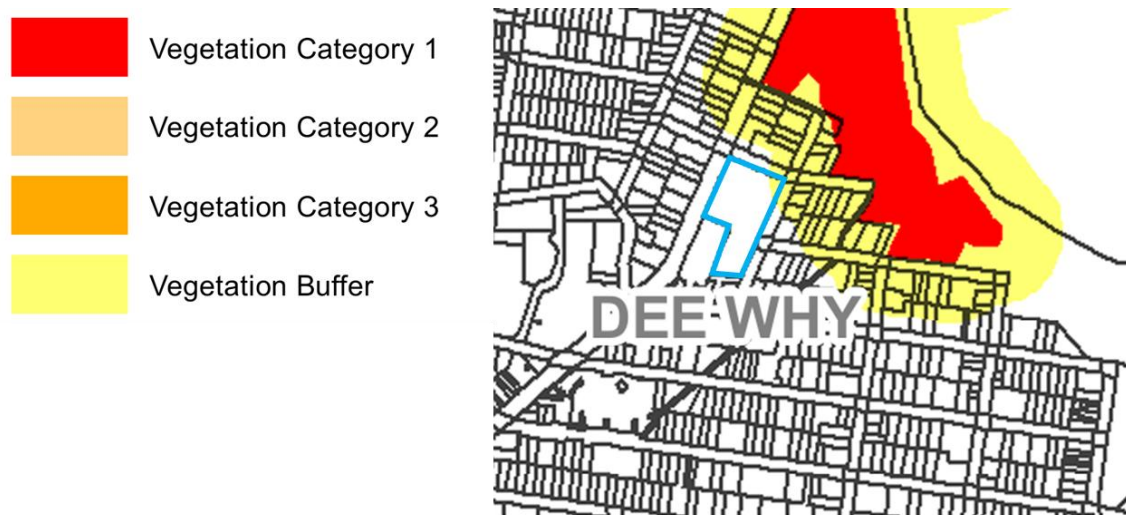


Figure 13: Bushfire prone land (Base source: Northern Beaches Council Bush Fire Prone Land Map)

4.4 Environmental Planning and Assessment Regulation 2021

There are no known matters prescribed by the EP&A Regulation that are relevant to the consideration of this application. The proposal will be compliant with the National Construction Code.

4.5 State Environmental Planning Policies

The proposal has been designed with regard to the objectives and standards of the relevant planning instruments and policies that apply to the site. Under the provisions of the EP&A Act, the key applicable state environmental planning policies are:

- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*

The application of the above plans and policies is discussed in detail below.

4.5.1 State Environmental Planning Policy (Resilience and Hazards) 2021

The Resilience and Hazards SEPP seeks to reduce risk and build resilience in the face of natural hazards as well as development-related hazards.

Chapter 2 aims to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the *Coastal Management Act 2016*. As outlined in Section 4.2 above, this chapter applies as the site is located within a 'coastal environment area'.

In accordance with Section 2.10 of the Resilience and Hazards SEPP, development consent must not be granted unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the 'coastal environment area'.

The proposal has been assessed against the provisions in Section 2.10 and it is determined that given the nature of the proposal, being primarily internal alterations and additions, and the location of the site, there will be no impact on the coastal environment or access to it.

The proposal is compliant with the other relevant section of the Resilience and Hazards SEPP including the general controls under Division 5.

4.5.2 State Environmental Planning Policy (Transport and Infrastructure) 2021

The Transport and Infrastructure SEPP seeks to guide the provision of well-designed and located infrastructure, including transport. An assessment of the relevant provisions is detailed below:

Chapter	Discussion
Section 2.119 - Development with frontage to classified road	<ul style="list-style-type: none"> Pittwater Road is a state classified road (no. 164). Vehicular access to the site will continue to be provided off Clarence Avenue which is a local road. The proposal does not increase the existing number of car parking spaces. On this basis, the proposed development will not affect the operation of Pittwater Road.
Section 2.120 - Impact of road noise or vibration on non-road development	<ul style="list-style-type: none"> This section does not apply as the proposal is not residential accommodation, a place of public worship, hospital, educational establishment or center-based child care facility.
Section 2.122 - Traffic generating development	<ul style="list-style-type: none"> The proposed development is not considered traffic generating development as there is no change to the existing car parking and therefore, the proposal will not generate 200 or more additional motor vehicle trips per hour.

Table 8: Transport and Infrastructure SEPP – relevant provisions

4.6 Warringah Local Environmental Plan 2011

The WLEP 2011 is the principal Environmental Planning Instrument applicable to the land. It aims to establish planning principles and development controls that will promote the orderly and economic use of land.

4.6.1 Zoning

Under the WLEP 2011, the subject site is zoned Zone R3 Medium Density Residential (Figure 14).

The use of the site as a registered club is permitted pursuant to 'clause 2.5 Additional permitted uses for particular land' and 'Schedule 1 (9) Use of certain Land at Pittwater Road, Dee Why' of WLEP 2011 (reproduced below). As shown within Figure 15 below, the site is identified as Area 9.

9 Use of certain land at Pittwater Road, Dee Why

- This clause applies to land at Pittwater Road, Dee Why, being Lot 1, DP 706230, shown as "Area 9" on the Additional Permitted Uses Map.*
- Development for the purposes of recreation facilities (indoor) (provided that the facility operates in conjunction with a registered club) and registered clubs is permitted with consent.*

The proposed alternations and additions are entirely consistent with Schedule 1 (9) of WLEP 2011 as they facilitate the ongoing operation of the Club which is the intended use of the land.



Figure 14: Site zoning (Base source: Espatial viewer)

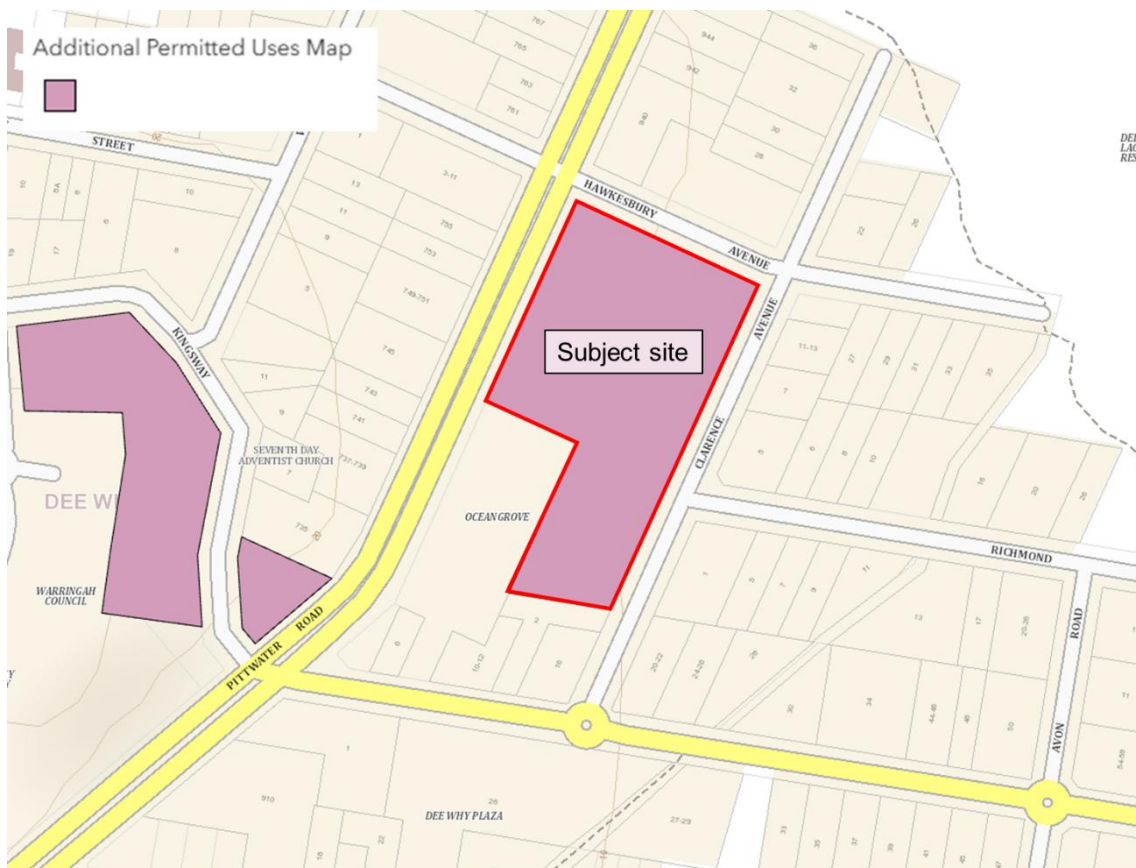


Figure 15: Site 9 additional permitted uses (Base source: Espatial viewer)

4.6.2 Floor space ratio

The site is not subject to a floor space ratio control under WLEP 2011.

The proposal provides a minor GFA increase from 15,208sqm to 15,827sqm (total 619sqm). This results in an FSR of 1.06:1.

The additional GFA is predominantly located on level 2 to allow the gaming area to be moved further north and allow additional food and beverage space in the south west corner of the building whilst a small amount is located on level 3 to facilitate a new communication room. Importantly, the GFA increase is contained entirely within the existing building footprint.

4.6.3 Height

The WLEP 2011 prescribes a maximum building height of 12m for the site (Figure 16).

The development proposes a maximum building height of 17.05m measured from ground level (existing), using the principles of *Merman Investments Pty Ltd v Woollahra Municipal Council*.

A Clause 4.6 variation has been prepared for the minor exceedance of 5.05m and is attached at Appendix 2. Importantly, the Club's building envelope has been approved with exceedances above the 12m height plane.

The variations proposed as part of this DA are below the existing building height breaches and cover 1.9% of the total roof area and therefore will not result in any further view or overshadowing impacts

An assessment of built form impacts, including the proposed height is provided at Section 6.

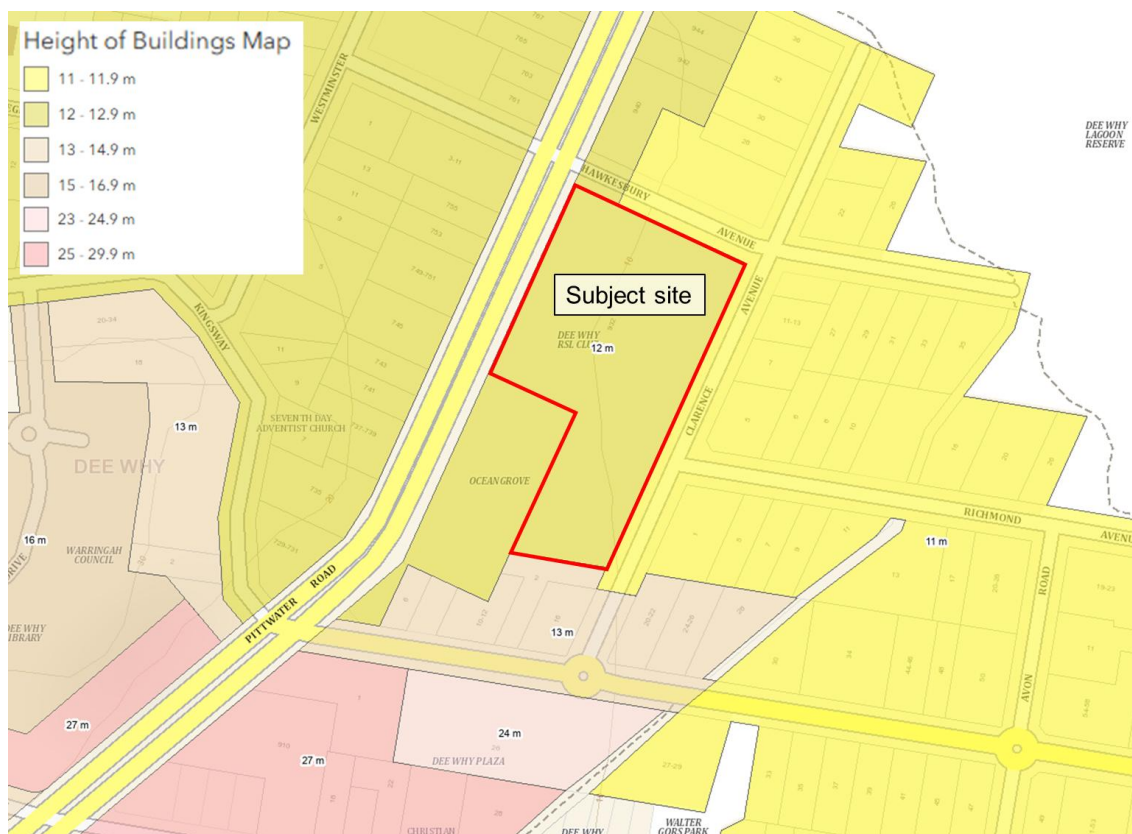


Figure 16: Height of buildings (Base source: Espatial viewer)

4.6.4 Heritage

The site does not contain any heritage items nor is it located within a heritage conservation area.

The following local heritage items, and heritage conservation area listed under WLEP 2011 are located in proximity to the site. These are outlined below:

- Dee Why Public Library (I50) - 170m southwest
- Civic Centre Landscaping (I137) - 200m southwest
- Street Tree (I39) - 160m southwest
- Dee Why Lagoon and Reserve Heritage Conservation Area (C5) - 80m northeast

Section 5.6 provides an assessment of the proposal and concludes given the separation distance, no heritage items or conservation areas will be adversely impacted by the proposal



Figure 17: Heritage mapping (Base source: Espatial viewer)

4.6.5 Other relevant matters

Relevant clause	Comment	Compliance
2.7 Demolition requires consent	<ul style="list-style-type: none"> As shown within the Architectural Plans (Appendix 5), the proposal includes demolition works. Demolition is permissible with consent pursuant to clause 2.7. 	Yes
5.21 Flood planning and 5.22 Special flood considerations	<ul style="list-style-type: none"> The site is identified as within the low and medium risk flood planning precinct (Figure 18). The proposal complies with the provisions of these clauses as: <ul style="list-style-type: none"> The proposed alterations and additions relate to the upper levels of the existing building. The proposal is not considered 'sensitive and hazardous development' as defined under clause 5.22. 	Yes
6.1 Acid Sulfate Soils	<ul style="list-style-type: none"> The site is partially identified as Class 5 Acid sulfate soils. Notwithstanding, the external works will not require excessive ground disturbance (i.e. landscaping and new stairs/ramps). Therefore, development consent is not required pursuant to clause 6.1(6) as the works will not disturb more than 1 tonne of soil and are unlikely to lower the watertable. 	Yes
6.4 Development on sloping land	<ul style="list-style-type: none"> The site is identified as Area A - Slope <5° on the landslip risk map which requires the consent authority to assess the proposal against clause 6.4. Notwithstanding, the proposed works will not change the built form envelope and therefore there are no additional impacts from what is existing. 	

Table 9: Other matters



Figure 18: Flood map (Base source: Council flood map)

4.7 Warringah Development Control Plan 2011

The proposal is generally in compliance with the aims, objectives and key provisions of the WDCP 2011. In areas of non-compliance the proposal has been well justified as detailed in this SEE.

A detailed assessment of the proposal against the relevant provisions is at Appendix 3.

4.8 Contributions

The *Northern Beaches Section 7.12 Contributions Plan 2024* applies to the proposed development as it has an estimated cost of more than \$200,000. On this basis, the applicable contributions levy is 1% of the total development cost.

5 Environmental planning assessment

Section 4.15(1)(b) of the EP&A Act requires an assessment of the developments environmental (natural and built), social and economic impacts. This section provides a detailed assessment of the impacts and concludes the proposal will not result in any adverse impacts.

5.1 Built form and visual impacts

The proposed external alterations and additions mainly relate to the northern and western elevations and the northern portion of the roof.

An assessment of the built form and visual impacts resulting from these changes is provided below.

Western elevation

A new entry is proposed along Pittwater Road which facilitates access to the Clubs main trading floor on level 2. This entry replaces an existing entry (ramp and stairs) which is located further north on Pittwater Road.

The intent is to provide a prominent entry along Pittwater road consisting of a new copper entry awning wrapping over the existing glass façade of the existing pre-function area on level 3. This form and materiality is consistent with the existing pedestrian and vehicle drop off on Clarence Avenue and therefore, provides a visual link between both Club entries.



Figure 19: Existing western elevation (Source: Google Maps)



Figure 20: Proposed entry on Pittwater Road (Source: Altis Architecture)



Figure 21: Existing Clarence Avenue Entry (Source: Altis Architecture)

Other external changes to the western elevation at street level (Level 2) include landscaping and new wall associated with the new enclosed terrace to the south of the entry to the building off Pittwater Road. This room is proposed to be converted from an alfresco gaming area to an enclosed terrace associated with the internally adjoining Asian restaurant to the east.

The above will involve filling in of a roof void along Pittwater Road that currently has louvers with glass.

A new façade treatment is also proposed and will tie in with the scale and materiality of the existing facade on this side of the building. Proposed materials include decorative screening and cladding with protruding nibs and recesses.

The central portion of the western façade will consist of cladding which in conjunction with the landscaping, work to break up the length and scale of this portion of the façade.



Figure 22: Central portion of the western facade (Source: Altis Architecture)

Northern elevation

The existing outdoor area fronting Hawkesbury Avenue (Level 2) is proposed to be enclosed as part of the alterations and additions to allow for an alfresco gaming area.

This results in façade treatments. The intention of the façade is to provide an architectural statement, not only to the Club but also to signify the arrival at the northern end of Dee Why Town Centre. As shown in the figures below, the existing building has a podium above the existing bowling centre.

The existing setback will be retained and a new façade will be constructed in front of the gaming area to ensure gaming machines are not visible from the public domain. The facade comprises multiple aluminium panels with stone detailing set in a metal frame and is curved to soften the buildings appearance and reduce the bulk and scale.



Figure 23: Existing podium indicated by the red line (Source: Altis Architecture)



Figure 24: Proposed podium with setback to façade (Source: Altis Architecture)

Further, as shown within the figures below, the proposed alfresco gaming area encloses an existing deck with a raised landscaped area. New egress fire stairs are proposed within the existing front setback. This is located beyond the existing building and facilitates emergency egress from the site onto Hawkesbury Avenue.

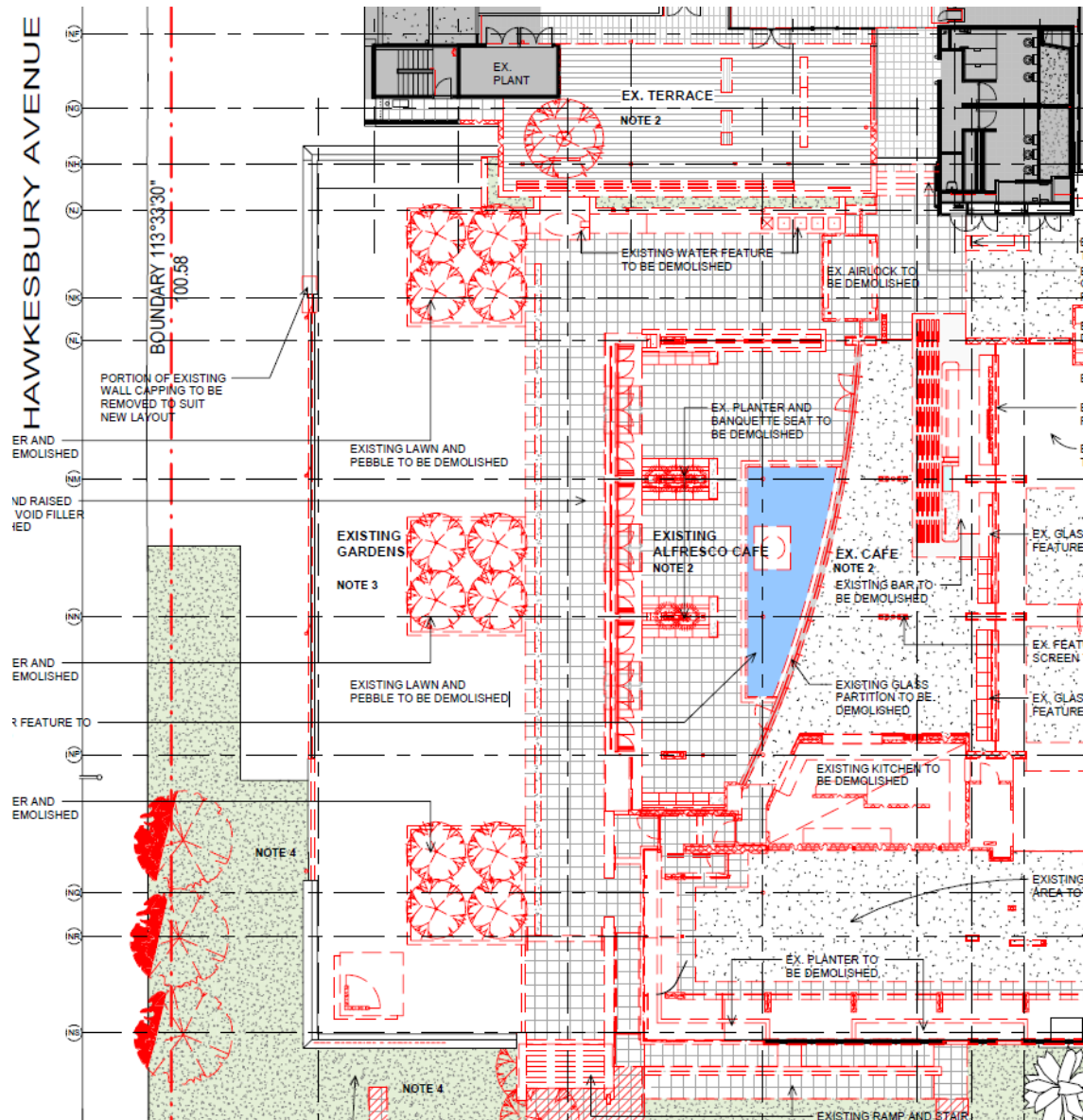


Figure 25: Level 2 existing and demolition plan (Source: Altis)

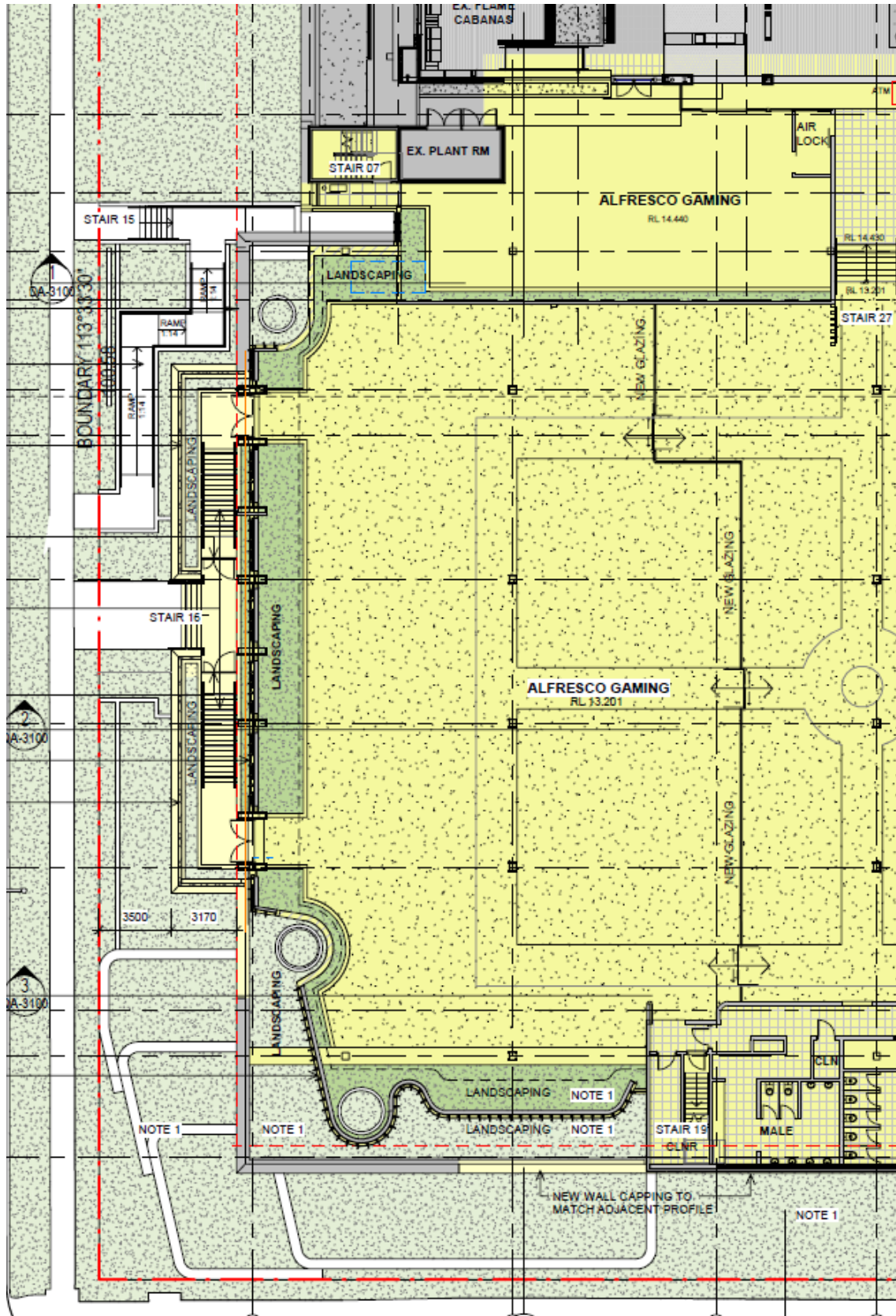


Figure 26: Level 2 proposed plan (Source: Altis Architecture)

Building height

The scale of the proposed alterations are largely in keeping with the scale of the existing building and generally comply with the 12m height limit on the site.

As shown within the figure below, the highest proposed parapet indicated by the blue dashed line on the figure below) has been aligned with the existing building height (red dashed line on the figure below) to ensure seamless integration into the existing building.

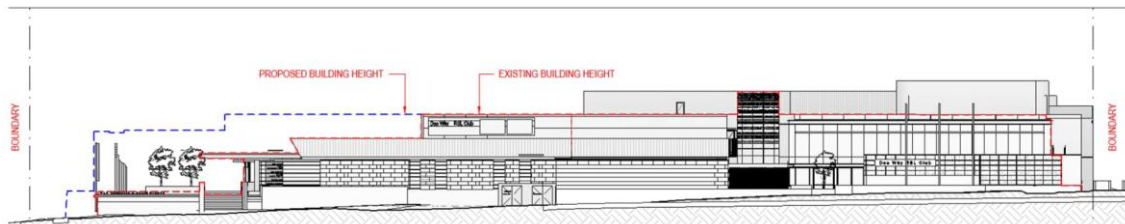


Figure 27: outline of proposed facade on the western elevation (Source: Altis Architecture)

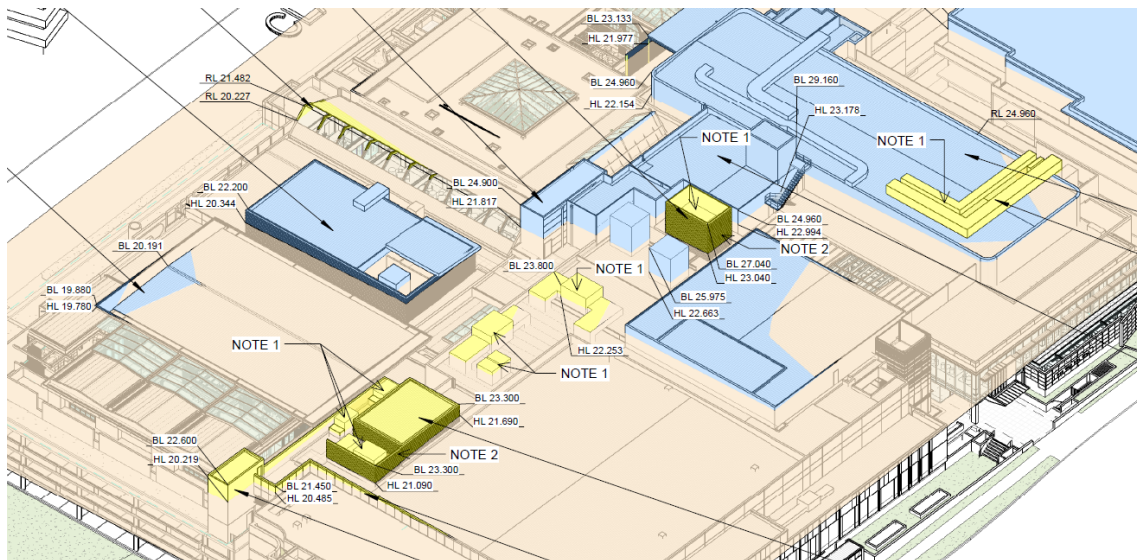


Figure 28: 12m height plane based on natural ground level (Source: Altis Architecture)

It is noted the design does propose to vary the height control by a maximum of 4m when measured from natural ground level or 5.05m when measured from existing ground level (using Merman methodology) in various locations. The variations include minor elements such as:

- stair access to the proposed roof
- plant room enclosure and equipment
- small portion of the proposed roof over the café

The variations are generally located in the northern portion of the existing building and setback from the building edge. The elements are generally not visible from the street and therefore minimal visual impact on eastern and southern residential neighbours is anticipated. Shadow diagrams are provided in the Architectural Plans and show no additional overshadowing of neighbours will occur due to the proposed variation

Importantly, the Club's building envelope has been approved with exceedances above the 12m height plane which include:

- plant rooms and equipment
- part of the existing level 3 auditorium
- level 4 offices
- lift overruns
- stairs to the existing roof

The variations proposed as part of this DA are below existing building height breaches and therefore will not result in any further view or overshadowing impacts.

A detailed Clause 4.6 Request (Appendix 2) has been prepared to provide further justification of these variations.

Bulk and scale

The proposed alternations and additions involve a minor GFA increase of 619sqm. Importantly, the GFA increase is contained within the existing building footprint (predominantly within the existing podium on level 2) and therefore does not change the existing bulk and scale.

As demonstrated within the shadow diagrams produced within the Architectural Plans (Appendix 5), the proposal will not result in any adverse solar impacts given the proposal remains largely compliant with the 12m height control.

5.2 Access

The proposal seeks to improve accessibility to the site by:

- relocating the secondary entrance on Pittwater Road closer to the existing bus stop
- installing additional ramps

A BCA Assessment Report has been prepared by BMG (Appendix 6) and provides an assessment against the Deemed-to-Satisfy provisions of the Building Code of Australia. It is noted the report states a separate report is required from an Access Consultant to outline the applicable requirements for the new/alterd positions of the building. An Access Report has been prepared, (Appendix 12) and confirms compliance with all relevant requirements of the:

- *Building Code of Australia (BCA 2022) sections D4, E3D6, E3D7, F4D6, F4D7*
- *DDA Premises Standards (and Access Code)*
- *Australian Standard AS1428.1 (2009) – Design for Access and Mobility: General Requirements*
- *Australian Standard AS1428.4.1 (2009) – Tactile Ground Surface Indicators*
- *Australian Standard AS1735.12 1999) – Lifts, escalators and moving walks*
- *Australian Standard AS2890.6 (2009) – Parking for people with disabilities*

5.3 Public domain and landscaping

A Landscape Package has been prepared by Site Image Landscape Architects (Appendix 7). As shown within the figure below, the proposal will result in an improved landscape outcome which is complementary to the public domain. The Landscape Package includes a detailed planting schedule and indicates the trees to be retained. In summary:

- the northern end of Pittwater Road as well as Hawkesbury Avenue will replace existing landscaping with trees, low level planting and tiered planter walls to obscure the podium
- landscaping along the southern end of Pittwater Road (comprising green walls, hedges and palm trees) will be retained



Figure 29: Proposed landscaping on Hawkesbury Avenue (Source: Altis Architecture)



Figure 30: Proposed landscaping on Pittwater Road (Source: Altis Architecture)



Figure 31: Existing landscaping on Pittwater Road

5.4 Traffic and transport

A Traffic and Parking Assessment has been prepared by Transport and Traffic Planning Associates (Appendix 4) to support the proposal.

The assessment confirms:

- existing vehicle accesses is being retained, and these driveways are located on a straight, level section of roadway where there are good sight distances
- the existing vehicle access, internal circulation and servicing arrangements will continue to be suitable and appropriate

Further to the above, it is noted the proposed alterations and additions:

- involve a small increase in GFA and therefore there will be a minor increase in patron capacity by 64 people. However, as confirmed within the Traffic and Parking Assessment, the existing parking facilities can accommodate this increase, and no additional car parking are required.
- will not affect the operation of Pittwater Road as a classified road as vehicular access to the site will continue to be provided off Clarence Avenue and the proposed development is not considered traffic generating development as outlined at Section 4.5.2 of this report.

In light of the above, the proposed works will not result in any adverse traffic implications.

5.5 Noise and vibration

A Noise and Vibration Impact Assessment has been prepared by RWDI Australia (Appendix 11) to provide an assessment against the relevant acoustic requirements contained within:

- *Warringah Development Control Plan (2011)*
- *Noise Policy for Industry (NPfI), NSW EPA, 2017*
- *Liquor & Gaming NSW Standard Criteria*

Representative receivers

Surrounding residential receivers have been identified as multi-level residences located in residential zoned areas on Pittwater Road and Clarence Avenue.

As shown within the figure below, the nearest residential receivers are:

- multi-level residences in the Oceangrove development fronting onto Pittwater Road
- Multi-level residences on Clarence Avenue
- Multi-level residences on Hawkesbury Avenue
- Multi-level residences on Pittwater Road



Figure 32: Surrounding receivers (Source: RWDI Australia)

Noise monitoring was undertaken to quantify the existing noise environment surrounding the site, see figure below.



Figure 33: Noise monitoring locations (Source: RWDI Australia)

Noise assessment

The assessment found the proposal will have three primary sources of noise generation:

- Operational noise from the alfresco and internal gaming areas, bistro and café located on Level 2
- Vehicle movements into the RSL along Clarence Avenue
- Mechanical plant noise.

The above-mentioned noise generation has been assessed and in summary, the results indicate that noise emissions from the site can comply with the relevant acoustic requirements as (but not limited to):

- operational noise associated with patrons within the enclosed areas will be relatively contained by the building façade and roof which will be sealed, air conditioned and likely to include 6mm glazing. This will adequately contain noise within the premises.
- there will be no changes to the operational traffic volume and therefore no additional acoustic impacts
- noise emissions from mechanical plant will be designed to comply with the requirements of the NSW EPA Noise Policy for Industry and the WDCP 2011.

5.6 Heritage

As outlined at Section 5.4.4, the site does not contain any heritage items nor is it located within a heritage conservation area. However, it is located in proximity to the following items and conservation area.

- Dee Why Public Library (I50) - 170m southwest
- Civic Centre Landscaping (I137) - 200m southwest
- Street Tree (I39) - 160m southwest
- Dee Why Lagoon and Reserve Heritage Conservation Area (C5) - 80m northeast

There will be no adverse impacts on any of the items or conversation area for the following reasons:

- A minimal separation distance of 80m provided between the site and the closest heritage item
- heritage items 50, 137 and 160 are not visible from proposal as view lines are obstructed by:
 - dense vegetation (Figure 34)
 - curvature of Pittwater Road (Figure 34)
 - six lanes of traffic on Pittwater Road (Figure 34)
 - medium and high density developments ranging from 3-8 storeys (Figure 34 and Figure 35)
- Heritage Conservation Area C5 is a landscaped conservation area and the proposed development will not adversely impact on the values of this area.



Figure 34: View from the site on Pittwater Road (Source: Google Maps)



Figure 35: View from the site on Clarence Avenue (Source: Google Maps)

5.7 Flood

As noted in Section 4.6.5, the site is identified as within a Low and Medium Flood Risk precinct. A flood risk management report has not been prepared given the proposed development relates to the upper levels of the existing building and therefore is not expected to affect flood behaviour.

Further, the building's accessibility is proposed to be improved as part of this application to improve entry and exit routes.

5.8 Fire

A Fire Safety Strategy and letter of support has been prepared to assess the proposals compliance with fire safety regulations (Appendix 13 and Appendix 16).

The assessment concludes that proposed performance solutions can be supported by performance-based fire safety engineering solutions.

5.9 Civil

Civil plans have been prepared by ACOR consultants and are provided at Appendix 18. These provide details of the proposed soil erosion and sediment control and stormwater management.

In addition, Council's On-site Detention Checklist has been completed and is provided at Appendix 20.

5.10 Waste management

A Waste Management Planning Letter of Compliance has been prepared by Waste Audit GFA Consulting Group (Appendix 8) to support the existing Waste Management Plan approved under DA2017/0969 (Appendix 9).

The letter has been prepared with reference to the WDCP 2011. Based on the proposed development, the anticipated waste streams are:

- cardboard/paper recycling
- comingled recycling
- food organics recycling
- crushed glass recycling
- general waste

The following table shows the recommended systems required to manage the estimated waste:

	<i>Estimated litres/week</i>	<i>Bin size</i>	<i>No bins</i>	<i>Collections/week</i>	<i>Capacity/week</i>	<i>Bin footprint sqm</i>
<i>General Waste</i>	87,992	1100	12	7	92,400	17.76
<i>Comingled Recycling</i>	12,208	1100	4	3	13,200	5.92
<i>Organics</i>	15,120	120	18	7	15,120	5.04
<i>Crushed Glass</i>	3,234	80	14	3	3,360	3.50
<i>Total</i>	118,554	-	48	-	124,080	32.22
<i>Plus 30% space allocation for bin circulation</i>						41.8

Table 10: Recommended waste management (Source: Waste Audit GFA Consulting Group)

Based on the above, the minimum size of the waste storage facility should be 41.8 sqm. The proposed bin room space is 47sqm and therefore is compliant.

5.11 Economic and socio-economic

The proposal will allow the existing club to make improvements to facilitate more efficient operations and economic use of the land.

This will allow the Club to cater to its members and the public through refurbished and updated interiors and facilities, improved accessibility and club operations (e.g. communications and plant) as well as a larger bistro and Asian offering.

The proposal will provide more jobs and improve a local club that is a common meeting location for local residents. On this basis, it promotes the social and economic welfare of the community.

The proposal promotes the social and economic welfare of the community as it will improve a local club that functions as a common social meeting place for local residents.

5.12 Construction management

A Construction management plan (CMP) will be prepared prior to any construction works commencing on the site. The CMP will address the following key matters:

- pedestrian and traffic management
- hours of construction work
- noise and vibration
- waste management
- air quality.

It is considered subject to the preparation and implementation of the CMP, that the impacts arising from the construction of the development can be mitigated and managed.

5.13 Suitability of the site

The site has been identified by Council as an appropriate location for a registered club and indoor recreation area given the additional permitted uses on the site.

The proposal maintains the approved use and therefore the site is entirely suitable for the proposed internal and external alterations and additions.

Accordingly, it can be concluded that the site/premises is entirely suitable to accommodate the nature and scale of the proposal.

5.14 Submissions

The proposal will be notified in accordance with the Council's notification policy. Council officers will consider any submissions received prior to the determination of the application.

5.15 Public interest

The proposal is in the public interest as it will achieve:

- a layout which improves the club by delineating between the different areas, ensuring the gaming space is separate from other club areas
- improves appearance from the public domain by removal of blank walls
- increases jobs within the locality

In addition, Council will consider any public submissions relating to the proposal during its assessment. Accordingly, it can be concluded that the proposed development is entirely in the public interest.

6 Conclusion

This SEE supports a development application for the proposed internal and external alterations and additions at 932 Pittwater Road, Dee Why. This SEE has been prepared and is submitted to Council pursuant to the provisions of Part 4 of the EP&A Act. A detailed examination of the proposal, in its legislative and physical context, has found that it:

- is consistent with the current legislative framework
- is consistent with the relevant strategic documents
- is suitable for the site and the area, after an assessment against the heads of consideration of section 4.15(1) of the EP&A Act
- does not give rise to any adverse impacts on nearby heritage items
- will not lead to any adverse traffic safety issues
- will not result in any environmental impacts or adverse impacts on the amenity of surrounding land.
- will enhance the operations, access and patron experience at Dee Why RSL providing significant benefits to both the Club, its members and the wider community.
- enables upgrades so the Club can continue to be a leading hospitality venue on the Northern Beaches
- will increase jobs within the locality

Consequently, approval of this development application is recommended.