

Appendix J-4



HEIGHT OF BUILDINGS AMENDMENTS FOR CERTAIN EMPLOYMENT ZONES SUPPORTING RESEARCH AND ANALYSIS

TO INFORM CONTROLS IN THE NORTHERN
BEACHES LOCAL ENVIRONMENTAL PLAN

February 2024

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Overview

A range of LEP amendments are proposed for height standards limited to certain employment zones but do not seek significant change to the bulk and scale of development, or the desired future character of the locality, as follows:

- minor increases to improve ceiling heights for 2/3 storey mixed use developments in local centres
- Amend existing heights for Brookvale Industrial Area (i.e. 11m to 18m)
- Propose new heights for Warringah Mall (i.e. RL25-RL30 under DCP to 30m)
- Propose new heights for Frenchs Forrest Business Park (11m & 21m for 'employment generating development')

Amendments under Zone E1 - 2 and 3 storey developments for increased ceiling height in Centres

The PP seeks minor increase to the LEP Height of Building Development Standard for 2 and 3 storey buildings in Local Centres to ensure adequate floor to ceiling height in accordance with contemporary urban design standards. In this regard the general height limit of 8.5m for 2 storeys development would increase by 0.8m to 9.5m, and 3 storey development at 11m would increase by 1.2m to 12.4m.

The proposed height amendment would provide for optimum floor to ceiling heights for a range of commercial and residential land uses at various levels of the building as detailed in the Figure below.

The proposed height amendment is recommended for a certain building typology in local centres as recommended in the Northern Beaches Urban Design Study and further reviewed under the Apartment Design Guidelines (further detailed in the PP at Part 3A.). The change is intended as a generic improvement to height standards for ceiling heights in 2 and 3 storey mixed use development with street level shops. DCP controls are to maintain the existing 2 and 3 storey scale of building.

Part 5 maps the extent of the local centres under the E1 local centre zone to which the amendment is to apply which generally excludes centres with a wider range of more locality specific controls (to be subject to further centre-based investigation in subsequent LEP amendments)

Figure: Existing and Proposed Height of Building with related number of storey and minimum ceiling height.

Zone	Existing HoB LEP Development Standard	Existing/proposed DCP requirement for number of storey	Minimum ceiling height recommendations	Proposed HoB LEP Development Standard
E1 Local Centre	8.5m	2 storey	<ul style="list-style-type: none"> • Ground level: 4m- 4.5m* • Level 1: 3.6m to support office • Roof: 1.2m 	9.3m (sum of floor to ceiling standards)
E1 Local Centre	11m	3 storey	<ul style="list-style-type: none"> • Ground level: 4m- 4.5m* • Level 1: 3.6m to support office • Level 2+: 3.1 to support residential • Roof: 1.2m 	12.4m (sum of floor to ceiling standards)
* Height standard maximised to provide opportunities for conversion to non-residential uses and to ensure that bulkheads do not intrude (see NSW Apartment Design Guidelines 4C.2 & 3 discussed at Part 3A of PP)				

Amendment under Zone E4 Industrial

Councils' analysis supports the consideration of minor height increases of at least one more storey across Northern Beaches Industrial lands (Northern Beaches Employment Lands Study (SGS, 2019) and Urban Design Study (AJC 2021). However, Brookvale Industrial area is the only E4 Zoned land subject to height amendments in this PP, increasing existing 11m height limits to 18m.

The Brookvale Structure Plan has completed detailed precinct-specific built form analysis with a range of recommendation for height including more significant structural height amendments associated with rezoning to be implemented under future LEP Amendments. However, this PP seeks to implement recommendations for increased height of the industrial zoned land in Brookvale (not subject to rezoning) to support a transition to higher density industrial uses and to incentivise renewal of this industrial area.

The proposed height increase will provide greater flexibility for future uses that may wish to remain located in the region but require additional floorspace to do so. With extraordinarily little vacant floorspace available, this approach, over time, will support a gradual transition to higher density industrial uses while also considering transition to surrounding lower scale areas. Not all sites will be built to their maximum building height, and for those sites that do, each will have their own specific implications for traffic generation. Given this, it is appropriate to assess the traffic impacts on a site-by-site basis at the development application stage accompanied by appropriate traffic and transport study.

Part 5 maps the land to which the height amendment is proposed under the E4 Industrial zone comprising the Brookvale Industrial area.

Other Industrial precincts in the LGA are, as with Brookvale, generally limited to 11m building heights but are still pending the completion of precinct-specific built form analysis that may inform some change in building heights under future LEP amendment.

Amendment under Zone SP4 - 11-21 metre building height limit for the SP4 Enterprise zone for Frenchs Forest Business Park

The PP seeks to introduce a maximum height of building development standards of 21m to apply to 'employment generating' developments and 11m for other development. The Frenchs Forest Business Park is one of the few Employment zoned lands on the Northern Beaches that is not subject to height of building development standards. Employment generating developments are to include office premises, health services facilities, community facilities, educational establishments, light industries, public administration buildings, warehouse or distribution centres.

The proposed 21m height standard for employment generating developments seeks to appropriately facilitate future development that satisfies the zone objectives of this Enterprise zone – set out below - as well as the strategic significance of the Frenchs Forest precinct, adjoining the Frenchs Forest Strategic Centre.

- To provide for development and land uses that support enterprise and productivity and facilitate local job targets for Frenchs Forest.
- To provide healthy, attractive, functional and safe business areas.
- To minimise conflict between land uses in the zone and adjoining zones and ensure the amenity of adjoining or nearby residential land uses. The proposed standards distinguish a maximum height standard for employment generating land uses against other uses seeks to minimise significant conflict between land uses – particularly from non-employment land uses that may otherwise limit enterprise and productivity. In relation to adjoining zones, the impact of proposed height controls in relation to adjoining zones which partly includes the R2 Low Density Residential zone are considered with accompanying DCP controls being prepared to minimise local impacts.
- To create business environments of high visual quality that relate favorably in architectural and landscape treatment to neighbouring land uses and to the natural environment.
- To provide a range of facilities and services, light industries, warehouses and offices. The proposed 21m height standard to apply to employment generating development provides for a range of uses identified in the zone objectives.
- To provide opportunities for new and emerging light industries.

- To restrict retail uses to ensure sufficient land is available for industrial and light industrial uses to meet future demands.

Proposed height controls for this Business Park (Zoned SP4) that are appropriate having regard to:

- Proposed height increases for this Business Park is consistent with planning associated with the Frenchs Forest Structure Plan in the vicinity and has regards to the existing scale of development, site context and adjoining lands.
- Frenchs Forest Structure Plan in the vicinity.

The proposed 11m height standard for other development is consistent with other Business Parks more generally on the Northern Beaches with established LEP height standards. Non-employment uses are constrained by the lesser height standard include Seniors Living to ensure capacity of the precinct to support enterprise and productivity.

Amendment under E2 – 30m for Warringah Mall precinct (excluding land for rezoning under Brookvale Structure Plan).

Brookvale Structure Plan does not make height recommendations for the Warringah Mall site (pending further site planning) except for the NW corner of the site proposed for future ‘town centre’ at 42m/52m.

A Consultant Study (*Warringah Mall Urban Design Analysis*, Zanadro, 2022) was commissioned to determine an appropriate maximum building height standard for the Warringah Mall site. The recommendations of the Study support a maximum 30m height of building development standard having regard to the following:

- Height standards in LEP will minimise the likelihood of environmental impact risks associated with unintended development outcomes for the site.
- While existing DCP controls set the lowest reasonable height that is appropriate for the site, approved DAs significantly exceed existing controls and sets a reasonable alternative maximum building height representing what has previously been found to be acceptable from a planning perspective.