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Mr Ray Brownlee  
CEO  
Nothern Beaches Council  
PO Box 82  
Manly NSW 1655

Dear Sir/Madam,

## **STATEMENT OF ENVIRONMENTAL EFFECTS - ALTERATIONS AND ADDITIONS TO CAR WASH AT 825-831 PITTWATER ROAD, COLLAROY**

This Statement of Environmental Effects (**SEE**) has been prepared by Urbis on behalf of Dee Why RSL Club Ltd (the **Applicant**) to accompany a Development Application (DA) to Northern Beaches Council (**Council**) for alterations and additions to the existing car wash at 825-831 Pittwater Road, Collaroy.

The proposed development will improve on-site traffic flow and congestion levels by adding an additional trafficable lane to access the car wash bays. In addition to this, the proposal will also increasingly rejuvenate the site, support on-going job opportunities and provide an enhanced car wash service for the surrounding community.

This SEE has been prepared in accordance with the requirements of the *Environmental Planning and Assessment Act 1979 (EP&A Act)* and the relevant provisions of the *Environmental Planning and Assessment Regulations 2000*. In addition to this SEE, the DA is accompanied by the following:

- Completed Development Application form, including owners consent;
- Survey Plans prepared by Crux Surveyors (**Appendix A**);
- Architectural Plans prepared by Altis Architecture (**Appendix B**);
- Landscape Plans prepared by Site Image (**Appendix C**);
- Arborist Report prepared by Birds Trees Consultancy (**Appendix D**);
- Traffic Statement prepared by PTC (Appendix E); and
- Civil Engineering Drawings prepared by RGH Consultancy (**Appendix F**).

This SEE includes a description of the site, details of the proposed development, consideration of the proposed development against Section 4.15 of the EP&A Act and a conclusion. This SEE concludes that the proposal is a suitable development for the site that will not result in any unreasonable impacts and can be reasonably approved, subject to the implementation of appropriate conditions.

## 1. THE SITE AND SURROUNDING CONTEXT

### 1.1. THE SITE

The site is located at 825-831 Pittwater Road, Collaroy and comprises 3 individual lots. These are:

- Lot 1 DP 1035107
- Lot 2 Section 1 DP 10649
- Lot 3 Section 1 DP 10649

The site is irregular in shape, has a total site area of 1,858sqm and contains two street frontages. These comprise a street frontage onto Pittwater Road to the south and a street frontage onto South Creek Road to the west. An aerial image of the site is provided in **Figure 1** below.

Figure 1 – The Site



Source: Urbis Pty Ltd

The site currently contains the existing Dee Why RSL car wash. Images of the existing site and development are shown within **Figure 2 (Picture 1 and Picture 2)**.

Figure 2 – Existing Development



Picture 1 – From Pittwater Road

Source: Google Maps



Picture 2 – From South Creek Road

Source: Google Maps

The Northern Beaches Bush Fire Prone Land Map was certified by the Commissioner of the NSW Rural Fire Service on 7 August 2020. The site is nominated as 'vegetation buffer' on the bushfire mapping – see below extract. The mapped yellow 'Buffer Area' identifies properties that could be impacted directly by the flame zone or indirectly via ember attack. The proposal is not changing any built form or intensifying the development, however for completeness a bushfire statement accompanies this DA submission.

Figure 3 – Bushfire Prone Land



## 1.2. SURROUNDING CONTEXT

The site is surrounded by the following:

- **North:** Directly adjacent to the north of the site is a Telstra exchange building. Further north is Cumberland Avenue, as well as a range of detached residential dwellings.
- **East:** Directly adjacent to the east of the site are a range of detached residential dwellings. Further east is Westmoreland Avenue, as well as further detached residential dwellings.
- **South:** Directly adjacent to the south of the site is Pittwater Road. Further south is Dee Why Lagoon.
- **West:** Directly adjacent to the west of the site is South Creek Road. Further west are multiple neighbourhood shops, as well as detached residential dwellings.

## 2. BACKGROUND

On 13 December 2005, development consent was granted by Council for the “*construction of a carwash facility*” at the site (DA 2005/0545). Since the approval of DA 2005/0545, three modifications applications have been lodged for the site to amend the carwash. These comprise:

- **DA 2005/0545/1:** Approved on 16 December 2005.
- **DA 2005/0545/2:** Approved on 8 February 2006.
- **DA 2005/0545/3:** Approved on 26 May 2006.

Given the extensive time that has passed since the original DA and subsequent modification applications were approved at the site, consent for the proposed new alterations and additions to the existing carwash are sought through the lodgement of a new DA.

## 3. PROPOSED DEVELOPMENT

The DA seeks development consent for minor alterations and additions to the existing Dee Why RSL car wash at the site. Specifically, the following works are proposed:

- **Demolition Works:**
  - Demolition of the existing driveway off Pittwater Road
  - Demolition of part of the existing landscaped area off Pittwater Road, including the removal of 8 trees.
- **Construction and Landscaping Works:**
  - Construction of a 6 metre wide driveway off Pittwater Road;
  - Construction of an additional trafficable lane;
  - Make-good and improvement to the existing landscaped area off Pittwater Road, including the planting of 5 trees to replace those lost and additional shrubs;
  - Painting of traffic line markings; and



- Installation of bollards.

These works will improve on-site traffic flow and congestion levels by adding an additional trafficable lane to access the car wash bays. The site offers two types of carwash services, manual wash and auto wash, by creating an additional trafficable new lane it will relieve congestion on Pittwater Road by always giving clear access to the autowash facility. Currently, the single lane is a considerable source of congestion as customers waiting for autowash are often blocked by customers lining up for manual wash facilities.

In addition to this, the proposal will also increasingly rejuvenate the site, support on-going job opportunities and provide an enhanced car wash service for the surrounding community. The existing operating hours of the carwash are unaffected by the proposal.

The proposed development will be constructed in accordance with the Architectural Plans attached at **Appendix B** and the Landscape Plans attached at **Appendix C**.

Images of the proposed development are provided within **Figure 3 (Picture 3 and Picture 4)**.

Figure 3 – Proposed Development



Picture 3 – Proposed Plan

Source: Altis Architecture



Picture 4 – Landscape concept

Source: Site Image

## 4. SECTION 4.15 ASSESSMENT

The matters referred to in Section 4.15 of the EP&A Act need to be considered in the assessment of the proposed development. Each of the matters relevant to the proposal are assessed below.

### 4.1. ENVIRONMENTAL PLANNING INSTRUMENTS

The environmental planning instruments applicable to the site and development are:

- *State Environmental Planning Policy (Coastal Management) 2018;*

- *State Environmental Planning Policy (Infrastructure) 2007*; and
- *Warringah Local Environmental Plan 2011*.

Consistency with each of the relevant controls with the above environmental planning instruments is discussed within the subsections below. It is also noted that there is no change to the access from Pittwater Road or capacity of the development and as such the provisions of the ISEPP do not apply.

#### **4.1.1. State Environmental Planning Policy (Coastal Management) 2018**

*State Environment Planning Policy (Coastal Management) 2018 (Coastal Management SEPP)* aims to ensure that development within coastal zones is appropriately managed to protect coastal environmental assets. The site is marked as being contained within a 'coastal environment area' and a 'proximity area for coastal wetlands' under the Coastal Management SEPP.

The proposal is considered acceptable under the Coastal Management SEPP, as the development will not impact on the following coastal matters:

- The integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment;
- Coastal environmental values and natural coastal processes;
- The water quality of Dee Why Lagoon;
- Marine vegetation, native coastal vegetation, fauna and their habitats, undeveloped headlands and rock platforms,
- Existing public open space and safe access to and along the foreshore, beach, headland and rock platforms;
- Aboriginal cultural heritage, practices and places; and
- The surf zone.

#### **4.1.2. State Environmental Planning Policy (Infrastructure) 2007**

The proposal has considered the relevant provisions of the ISEPP and makes the following points:

- The proposed development does not seek to increase the capacity of the site in terms of traffic generating development under Clause 104/Schedule 3 of the ISEPP. The proposal is seeking to improve the internal functioning of the current operation, and not to intensify the use or increase number of cars accessing or utilising the site.
- As minor works are proposed to widen the existing driveway from Pittwater Road, under Clause 101 (land with frontage to a classified road) Council may choose to refer the application to RMS.

#### **4.1.3. Warringah Local Environmental Plan 2011**

The *Warringah Local Environmental Plan 2011 (WLEP)* is the principal environmental planning instrument governing development at the site. An assessment against the relevant controls of the PLEP has been undertaken in **Table 2**.

Table 1 – WLEP Compliance Table

Clause	Control	Comment	Compliance
Clause 2.2 – Land Use	R2 Low Density Residential	<p><b><u>Car Wash:</u></b></p> <p>The DA seeks development consent for alterations and additions to the existing car wash at the site. Under the WLEP, a carwash is defined as a ‘business premises’, which is a prohibited land-use within the R2 zone.</p> <p>Notwithstanding this, the site operates under existing use rights provisions, as:</p> <ul style="list-style-type: none"> <li>Approval was granted by Council on 13 December 2005 under DA 2005/0545 for the construction of a carwash at the site pursuant to Warringah LEP 2000; and</li> <li>This carwash still exists and has been operating continuously at the site under DA 2005/0545 (as amended).</li> </ul> <p>Considering this, the proposal is therefore permissible with consent at the site.</p> <p><b><u>Associated Signage/lane marking:</u></b></p> <p>The DA also seeks development consent to amend existing ‘business identification signs’ at the site (within the approved signage zones). No new signs are sought just a refresh of the approved signs/lane marking to improve legibility.</p> <p>Under the WLEP, ‘business identification signs’ are permitted with consent. These proposed amendments at the site are therefore permissible with consent.</p>	CONDITIONAL Existing Use Rights
Clause 4.3 – Height of Buildings	8.5m	The proposed development does not impact the existing maximum building height at the site.	YES

Clause	Control	Comment	Compliance
Clause 4.4 – Floor Space Ratio	N/A	The WLEP has not adopted Clause 4.4 – Floor Space Ratio. A Floor Space Ratio control therefore does not apply to the site.	N/A
Clause 5.10 – Heritage Conservation	Conserve the heritage significant of surrounding heritage items and heritage conservation areas.	<p>The site is not identified as a heritage item or located within a heritage conservation area. However, the site is located near the 'Dee Why Lagoon and Reserve' heritage conservation area' (Heritage Item C5).</p> <p>Given the minor nature of the proposal, no adverse heritage impacts will be generated on Dee Why Lagoon and Reserve.</p>	YES
Clause 6.1 – Acid Sulfate Soils	Class 5 Acid Sulfate Soils	The works proposed under this DA will not impact the water table.	YES
Clause 6.4 – Development On Sloping Land	Area A – Slope < 5 degrees	<p>The proposed development has been specifically designed to ensure that the minor slope contained to the site will:</p> <ul style="list-style-type: none"> <li>• Not result in a landslide of material;</li> <li>• Not result in adverse stormwater discharge from the site, and</li> <li>• Not impact on or affect the existing subsurface flow conditions.</li> </ul>	YES

As per the above, the proposal complies with each of the relevant controls of the WLEP. The proposed alterations and additions are permitted with consent at the site under existing use rights.

## 4.2. DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No draft environmental planning instruments are relevant to this proposal.

## 4.3. DEVELOPMENT CONTROL PLAN

The Warringah Development Control Plan 2011 (**WDCP**) provides detailed planning controls for specific developments types and locations. Most controls relate to character, streetscape and public domain works. An assessment of the proposal against the relevant controls of the PDCP has been undertaken in **Table 3**.



Table 2 – WDCP Compliance Table

Control	Control	Comment	Compliance
C2 – Traffic, Access and Safety	<ul style="list-style-type: none"> <li>Demonstrate that the location of vehicular and pedestrian access meets the objectives.</li> </ul>	<p>The proposal does not seek any new road openings but improves the vehicle circulation within the site and as such minimises the queuing on Pittwater Road, particularly at peak times. See accompanying traffic statement by PTC.</p> <p>The creation of an additional trafficable new lane it will relieve congestion on Pittwater Road by always giving clear access to the autowash facility. Currently, the single lane is a considerable source of congestion as customers waiting for autowash are often blocked by customers lining up for manual wash facilities.</p>	YES
C4 – Stormwater	<ul style="list-style-type: none"> <li>Stormwater runoff must not cause downstream flooding and must have minimal environmental impact</li> <li>The stormwater drainage systems to be designed, installed and maintained in accordance with Council's Water Management Policy</li> </ul>	<p>Civil drawings are provided with the DA submission and include stormwater plans.</p> <p>There is no change to the existing OSD as a result.</p>	YES
C5 Erosion and Sedimentation		Civil drawings are provided with the DA submission and include sediment and erosion, plan and details. The appropriate consent conditions can be imposed.	YES
C8 – Demolition and Construction	<ul style="list-style-type: none"> <li>All development that is, or includes, demolition and/or</li> </ul>	There is minor demolition occurring in the proposal and a construction waste management plan will be prepared prior to	YES

Control	Control	Comment	Compliance
and C9 Waste Management	construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must be accompanied by a Waste Management Plan.	works occurring on site. There is no change to the operational WMP.	
D3 Noise		There is no change to the operating hours or waste collection and the like.	YES
D18 – Accessibility and Adaptability		The proposal is accessed via vehicles, given the service provided, however pedestrian safety and accessibility has been considered along Pittwater Road frontage to ensure the footpath remains legible.	YES
Control D20 – Safety and Security		There is no change to the operating procedures of the site. The current design, including lighting is maintained.	YES
Control D23 – Signs		No new signs are sought, however some paving paint may be proposed to identify the appropriate lane and type of car wash.	YES
Control E1 – Preservation of Trees or Bushland Vegetation		<p>An arborist statement is provided with the DA submission and recommends the removal of 8 trees given the proposed works (to create the additional lane) encroach beyond 10% of the trees' TPZ. No threatened species or endangered communities are present on site.</p> <p>The statement comments that, “<i>Trees 7, 8, 9, 10, 11, 12, 13 and 14 are encroached by the proposed construction and required earthworks by a major encroachment as defined by AS4970-2009 Protection of Trees</i></p>	YES

Control	Control	Comment	Compliance
		<p><i>on Development Sites. These trees will not be viable to be retained and are recommended for removal".</i></p> <p>A revised landscape concept for the site is proposed to assist in providing compensatory planting including 5 x Crepe Myrtles at the frontage along with shrubs, groundcovers and grasses.</p>	
Control E10 – Landslip Risk		<p>The proposed development has been specifically designed to ensure that the minor slope contained to the site will:</p> <ul style="list-style-type: none"> <li>• Not result in a landslide of material;</li> <li>• Not result in adverse stormwater discharge from the site, and</li> <li>• Not impact on or affect the existing subsurface flow condition</li> </ul>	YES

As per the above, the proposal generally complies with each of the relevant controls of the WDCP.

#### 4.4. PLANNING AGREEMENT

No planning agreements are relevant to this proposal.

#### 4.5. REGULATIONS

The application has been prepared in accordance with the relevant provisions of the *Environmental Planning and Assessment Regulations 2000*.

#### 4.6. LIKELY IMPACTS OF THE PROPOSAL

An assessment of the likely impacts of the proposal are addressed within the following subsections.

##### 4.6.1. Built Form

The proposed works are minor in scale and simply seek to facilitate an additional trafficable lane to improve traffic flow, decrease queuing and allow ease of access to the car wash bays. Accordingly, the proposed works will:

- Not increase the sites maximum building height, bulk or scale;
- Not overshadow adjoining roads, properties or public open spaces;
- Not result in a loss of views from surrounding properties;

- Not result in a negative outlook when viewing the site from the street; and
- Not generate undesirable wind impacts on the surrounding locality.

Considering the above, the proposal is deemed to be unobtrusive and will not result in the creation of any adverse built form impacts upon the surrounding locality.

#### **4.6.2. Traffic Flows**

The proposed development will greatly improve traffic flows within the site, by providing an additional trafficable lane to access the car wash bays. The site offers two types of carwash services, manual wash and auto wash, by creating an additional trafficable new lane it will relieve congestion on Pittwater Road by always giving clear access to the autowash facility. Currently, the single lane is a considerable source of congestion as customers waiting for autowash are often blocked by customers lining up for manual wash facilities.

The accompanying PTC statement summarises the proposed arrangement for the purposes of his assessment as,

- *“The proposed arrangement involves a number of measures, including physical alterations to the site, simple signage and line marking and a revision of the brand-based signage design”.*
- *“The new arrangement will increase the capacity by approximately 80% - 100% before obstructing internal functions. This will assist in reducing the risk of queueing onto Pittwater Road. Furthermore, this arrangement also represents a first-come-first-serve solution, which will improve customer satisfaction and change the current behaviour of waiting at the driveway. To achieve this arrangement, the landscaping is to be reduced to allow for a separate lane to be created for auto wash bays 1 and 2 and the driveway will need to be widened to 6m”*

PTC’s assessment concludes that,

*“It has been observed that the current Dee Why Car Wash generates some queueing extending beyond the driveway and onto Pittwater Road, blocking the bus lane during peak times. By widening the driveway and reducing the landscaping to increase the hardstand area this allows a separate lane to be created for the auto wash bays 1 and 2. This along with an improved queuing system will assist in reducing on street queueing at peak times”.*

#### **4.7. SUITABILITY OF THE SITE**

The proposed development is considered highly suitable for the site, as the works will not result in any unreasonable impacts and simply seek to alter the existing carwash which is already established at the site. The proposal is permissible with consent and does not impact the existing land-use or building height at the site. In addition, the proposal is minor in scale and will lead to the development of a site that can provide greater amenity into the future. Accordingly, the proposed works do not create an undesirable precedent and are considered suitable for the site.

#### **4.8. SUBMISSIONS**

It is acknowledged that submissions arising from the public notification of this application will need to be assessed by Council.

#### **4.9. PUBLIC INTEREST**

The proposed development is considered in the public interest for the following reasons:

- The proposal accords with the principles and objectives of all relevant planning controls;
- No adverse social, environmental or economic impacts will result from the proposed development;
- The proposal will improve on-site traffic flow and congestion levels;
- The proposal will provide a range of temporary job opportunities;
- The proposal will continue to support on-going job opportunities; and
- The proposal will increasingly rejuvenate the site and provide an enhanced car wash service to the surrounding community.

Considering the above, the proposed development is seen to be in the public interest.

#### **5. CONCLUSION**

This SEE has been prepared by Urbis on behalf of Dee Why RSL Club Ltd to support a DA seeking development consent for alterations and additions to the existing Dee Why RSL carwash at the site.

The proposed development will improve on-site traffic flow and congestion levels by adding an additional trafficable lane to access the car wash bays. In addition to this, the proposal will also increasingly rejuvenate the site, support on-going job opportunities and provide an enhanced car wash service for the surrounding community.

Based on the content contained throughout this letter, it is considered that the proposed works should be approved, subject to the implementation of appropriate conditions. Should you have any queries regarding the application, please do not hesitate to contact Jarred Stratham (Consultant) or the undersigned.

Kind regards,

A handwritten signature in blue ink, appearing to read "Naomi Daley".

Naomi Daley

Associate Director

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