

**LEVEL 7**  
**6 HASSALL STREET**  
**PARRAMATTA NSW 2150**

URBIS.COM.AU  
Urbis Ltd  
ABN 50 105 256 228

20 December 2024

Development Assessment Team  
Northern Beaches Council  
725 Pittwater Road  
Dee Why NSW 2099

Dear Sir/Madam,

## **STATEMENT OF ENVIRONMENTAL EFFECTS | WESTFIELD WARRINGAH TICKETLESS PROPOSAL - 145 OLD PITTWATER ROAD, BROOKVALE**

This Statement of Environmental Effects (**SEE**) has been prepared by Urbis Ltd on behalf of Scentre Group to support a development application (**DA**) for the implementation of ticketless parking at 145 Old Pittwater Road, Brookvale (Westfield Warringah/the centre).

The application seeks development consent for several upgrades to the centre's parking system. These include replacement of ticketed car park control system with a ticketless car park control system using number plate recognition technology. The proposal also includes improvements to customer wayfinding signage through introduction of dynamic signage that will be linked to the ticketless parking system and will implement a CCTV surveillance system to handle customer queries and document vehicle accidents and adverse behaviour. Additionally, an expanded network of 'co-mingle' areas will be designated staff and retailer parking. Minor modifications will be made to the layout of the existing car park and entry/exit points, lighting upgrades for all vehicle entries and exits will be installed and installation of external lights that are required to provide illumination in the area.

A full description of the proposed development is included in **Section 2** of this report.

This SEE includes:

- Identification of site and locality
- Description of the proposed development
- Assessment of the relevant matters listed under Section 4.15 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This letter is accompanied by:

- Owner's consent (**Appendix A**)
- Cost estimate prepared by Scentre Management Limited (**Appendix B**)
- Architectural plans (including ticketless infrastructure and signage) prepared by Scentre Group (**Appendix C**)

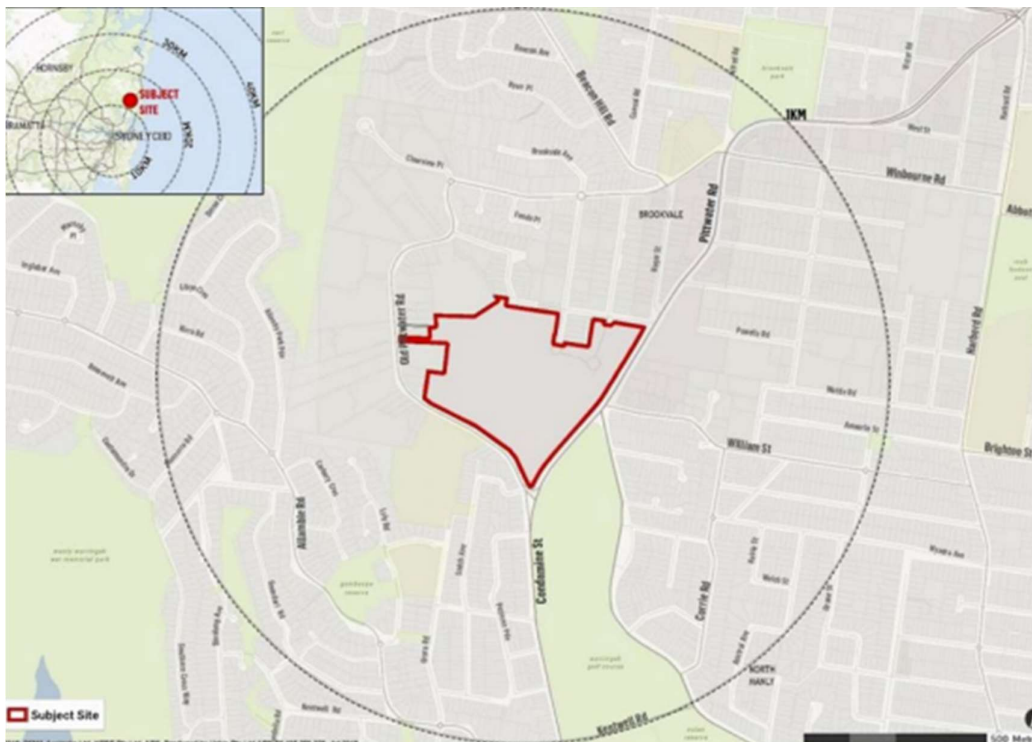
- Survey Plan prepared by RPS (**Appendix D**)
- Specialist technical reports including:
  - Car Parking Management plan prepared by Scentre Group (**Appendix E**)
  - Traffic and Parking Statement prepared by SLR Consulting (**Appendix F**)
  - Engineering statement covering flooding, stormwater and civil prepared by Stantec (**Appendix G**)

## 1. SITE AND SURROUNDING CONTEXT

The site is located in the suburb of Brookvale in the Northern Beaches Local Government Area (**LGA**). Brookvale is located approximately 18kms from the Sydney CBD and is identified in the North District Plan as a Strategic Centre. The site is situated at the junction of several land uses and is characterised by low scale commercial development. Beyond the subject site to the north, to the west and to the east, land use is characterised by industrial development. Low density residential development interspersed by public and private reserves is located at the perimeter of the above described commercial and industrial lands.

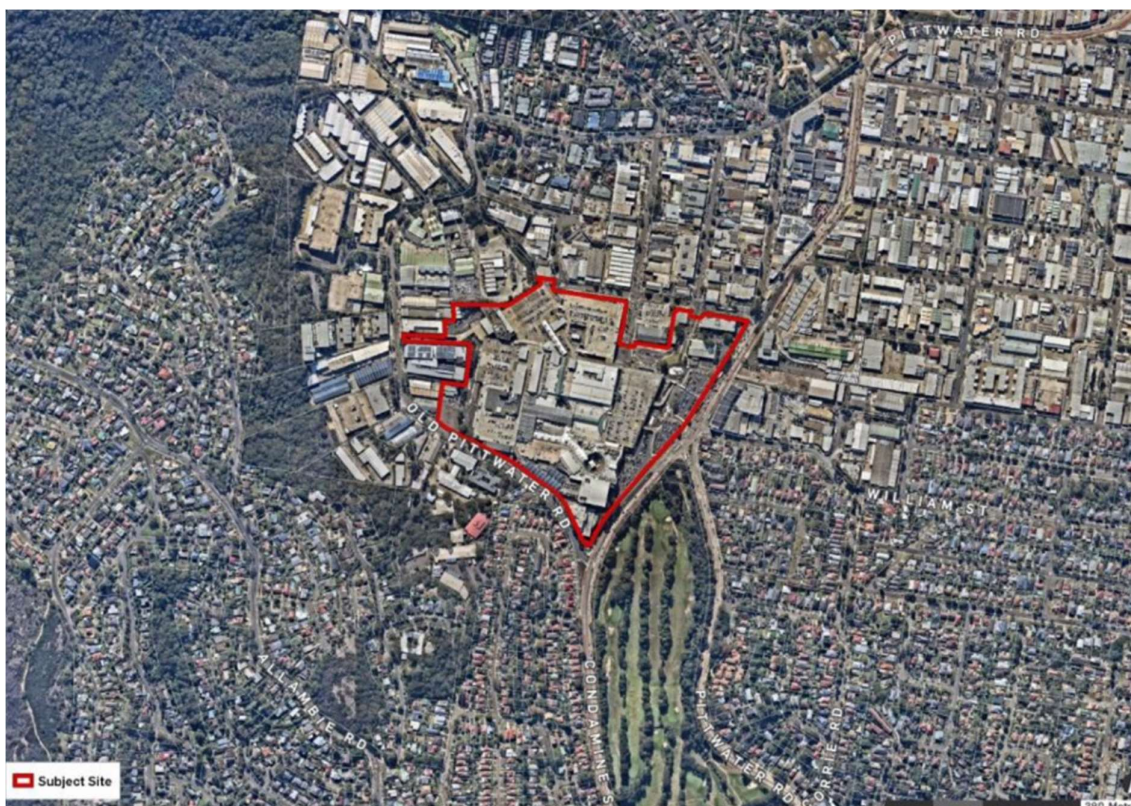
A locality diagram indicating the location of the site relative to Sydney CBD is provided at **Figure 1** and site aerial at **Figure 2**.

Figure 1 Locality diagram



Source: Urbis

Figure 2 Site Aerial



Source: Urbis

The site is situated on a large irregularly shaped parcel of land known as 145 Old Pittwater Road, Brookvale with a legal description of Lot 103/-/DP1247294. The site is bound to the north by Cross Street and adjacent industrial lands, to the south by Old Pittwater Road and to the east by Condamine Street and Pittwater Road. The site area is approximately 170,600 sqm.

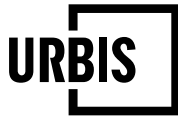
The site has a gradual natural slope that falls from the northwest to the southeast of the site and contains limited vegetation, with the only substantial planting located along the street frontages of the site and within the open-air car parking areas. Vehicle access to the site is currently available at several locations along the Old Pittwater Road, Pittwater Road and Cross Street frontages of the site.

## 2. PROPOSED DEVELOPMENT

This application seeks consent for alterations to the approved Westfield Warringah carparking areas to provide a ticketless car park control system and associated infrastructure and wayfinding signage.

Specifically, the application seeks consent for:

- Replacement of ticketed car park control system with a ticketless car park control system;
- Replacement of boom gates at exit points where payment transactions can also be completed;



- Installation of CCTV surveillance monitoring system to all ticketless car park control systems that will;
  - Cater for customer queries; and
  - Document vehicle accidents and adverse behaviour.
- Installation of lighting upgrades for all vehicle entries and exits;
- Designation of 'co-mingled' areas that will be for staff parking only;
- Minor modifications of the layout of the existing centre car park, as well as entry/exit points including loss of 28 car parking spaces; and
- Installation of wayfinding signage throughout the car park;
  - This includes both dynamic and static signage designed to inform and guide customers towards lesser utilised area of the car park and assist with egress by guiding vehicles to less congested exit points.

The application is accompanied by a controlled car park management plan provided at **Appendix E** which describes the features of the system to be implemented and associated management procedures undertaken by Scentre Group.

Civil design drawings will be prepared prior to the issue of a Construction Certificate (CC) however an accompanying statement from Stantec states that any minor adjustment works will be in accordance the relevant standards.

The primary objectives of the proposed ticketless car park control system is to:

- Improve access arrangements for customers, without the need for entry control gates and parking tickets;
- Ensure a turnover of shopper parking spaces;
- Improve car park efficiency and internal circulation;
- Improve parking utilisation through improved wayfinding;
- Enhance security;
- Discourage long-stay parking; and
- Manage staff/tenant parking to less convenient shopper parking spaces.

The implementation of the ticketless car parking system will lead to the loss of 28 parking spaces. These lost spaces are primarily located near the new gates and are currently not well utilised, as they are more difficult to access and are not close to the shopping centre's pedestrian entry points.

## **2.1. PROGRAMME AND STAGING**

The proposed development for the ticketless car parking system, is anticipated to have a construction phase lasting approximately five months. Pending the proposed development approval, the proposed works will likely commence work in Q2 2025, with the project expected to be completed by Q3/4 2025.

At this stage it is anticipated that one access gate will be constructed at a time, however two gates at a time (at opposite ends of the centre) could be considered to reduce the overall program duration.

Prior to and during the works Scentre will ensure that the appropriate traffic management, signage and customer messaging is employed.

A detailed Construction Management Plan (CMP) will be prepared prior to the commencement of works and this will further outline any phasing of the work and also the hours of works including out of hours work.

## **2.2. OPERATION OF TICKETLESS PARKING SYSTEM**

The proposed ticketless car park control system incorporates number plate recognition (**NPR**) at all entry and exit points of the car park.

Customers will be provided free parking for up to three hours Monday to Sunday, with a concessional fee structure applied to retail staff and tenants in designated car park areas. There will be five parking areas, as shown in **Figure 3**.

Co-mingle areas (Areas A, B, C, & D) will allow both customers and staff to park in the area. The licence plate cameras at the entries and exits to the co-mingle areas will validate the concessional parking rate for staff. As there are no boom gates on these areas there is no interaction or restriction for customers. The primary advantage of co-mingled areas is that they maximise the utilisation of parking spaces.. To benefit from the concessional parking rates and access to nested areas, retail staff and tenants are generally required to register their details online, which Westfield staff can also assist with at any concierge desk within the shopping centre.

The ticketless car park control system prevents long stay parkers from resetting their parking time by exiting and re-entering. It combines the total parking time from both entries and charges based on the combined duration. So, in turn deters commuter parking or long stay parkers.

To accommodate genuine customers who visit the centre multiple times in one day, the system includes a programmable re-entry time. This is the minimum duration a vehicle must be out of the centre before the free parking time resets. The standard re-entry time is set at 45 minutes across the Scentre portfolio, but Centre Management can adjust this period based on local operating conditions. Customers are informed of the re-entry period through the terms and conditions displayed at car park entries and on the centre's website.

The existing bus stop at the northern end of Warringah Mall, accessed via Cross Street and exited via Green Street, will be integrated into the new ticketless parking control system. The entry gates on Cross Street have been widened to accommodate buses and service vehicles, with the western gate aligning with the Cross Street roundabout for bus access. To prevent vehicles from bypassing the parking system, the exit to Green Street will be gated, featuring a height sensor to allow buses to exit without interacting with the parking system. Scentre Group has consulted with local bus operators, Keolis Downer Buses, as part of the development application to ensure the height sensor location and sensitivity as well as smooth egress of the buses from the internal busway is achieved.



Figure 3 Retail Staff Parking Locations



Source: Scentre Group

## 2.3. SIGNAGE

The proposal seeks consent for wayfinding signage, that will be placed throughout the Westfield Warringah car park. The proposed locations of the wayfinding signage is illustrated in **Figure 4**. The new wayfinding signage will guide customers to the available car parks/or bays and will assist in navigation throughout the car park area and will consist of totem, gantry and blade signage.

The proposed gantry signage is 3.6 metres in width and 0.35 meters in height. It features bold white text and is backlit for easy legibility at night. Additionally, the gantry signage includes a four-digit module that displays the number of available parking spaces, measuring approximately 0.51 metres in width and 0.27 meters in height.

The proposed blade signage will be smaller in scale, with lengths of 1.2m, 1.5m, and 2.4m, and a width of 0.15m. The signage will feature simple white lettering on a green background with a white arrow. It will include the words "way out" and the street name. The lettering will be legible up to 45m.

Several totem signs are proposed as part of the development to assist with wayfinding throughout the car park. These signs will feature the Westfield logo and provide parking wayfinding information, including a four-digit module displaying available parking spaces. The signs will also feature the letter

'P' and an arrow pointing visitors in the direction of available parking. Additionally, a section at the bottom of each totem sign will vary, indicating which retailers are closest to the parking area.

Figure 4 Proposed Wayfinding Signage Location



Source: Scentre Group

## 2.4. OTHER WORKS

Lighting is also proposed at the entry gates to ensure the safety of the vehicles and to ensure that the number plate recognition visible.

There is some underground infrastructure works, for power, to the gates also proposed. Detailed inground surveys for service depths will be undertaken prior to construction.

The proposed signage is detailed in **Appendix C** and assessed in **Section 3.1.2** of this report.

## 3. SECTION 4.15 ASSESSMENT

The proposed development has been assessed in accordance with the relevant matters for consideration listed in Section 4.15 of the EP&A Act.

### 3.1. ENVIRONMENTAL PLANNING INSTRUMENTS

The proposed development has been assessed in accordance with the relevant State and local environmental planning instruments, including:

- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy Industry and Employment 2021*
- *Warringah Local Environmental Plan 2011 (WLEP 2011)*

### 3.1.1. State Environmental Planning Policy (Transport and Infrastructure) 2021

*State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)* sets out requirements for various infrastructure works throughout the State. The Transport and Infrastructure SEPP requires the referral of certain development applications to Transport for NSW (TfNSW) during the DA assessment process.

Clause 2.118 of the Transport and Infrastructure SEPP requires referral to TfNSW in relation to development proposals for land with a frontage to a classified road. The site is located adjacent to the intersection of two classified roads, being Pittwater Road and Condamine Street, the proposed works are located within the existing car park, do not propose any increase in GFA or increase in parking, therefore a referral is not required.

### 3.1.2. State and Environmental Planning Policy Industry and Employment 2021

Chapter 3 of the *State Environmental Planning Policy Industry and Employment 2021 (Industry and Employment SEPP)* outlines the requirements and considerations relating to advertising and signage. It aims to ensure that advertising and signage is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations and is of high-quality design and finish. It does not regulate the content of signs and advertisements.

Part 3.2, Section 3.6 of the Industry and Employment SEPP prevents development consent from being granted to signage unless the consent authority is satisfied that it is consistent with the objectives of Chapter 3 and has satisfied the assessment criteria specified in Schedule 5 of the policy.

An assessment of the proposed signage against Schedule 5 of the Industry and Employment SEPP is include in **Table 1**.

Table 1 Compliance with Schedule 5 of the Industry and Employment SEPP

Criteria	Assessment	Compliance
<b>Chapter 3: Policy Aims and Objectives</b>		
This Chapter aims to ensure that signage (including advertising):		
(i) is compatible with the desired amenity and visual character of an area, and	The proposed signage is consistent with shopping centre signage.	Yes.
(ii) provides effective communication in suitable locations, and	The proposed signage provides clear visual wayfinding signage associated with Westfield Warringah carparking which will assist visitors navigate the site.	Yes.



Criteria	Assessment	Compliance
(iii) is of high quality design and finish, and	The proposed signage is consistent with the colour scheme of car parking signage and will be constructed of high quality durable materials.	Yes.
<b>Schedule 5 Assessment Criteria</b>		
<b>1. Character of the area</b> <ul style="list-style-type: none"> <li>Is the proposal compatible with the <i>existing or desired future character of the area or locality in which it is proposed to be located?</i></li> <li>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</li> </ul>	The proposed signage will have no adverse impact on the character of the area. The Westfield Warringah Mall is within a E3 Productivity zone where signage provided in connection with retail and commercial uses is common.	Yes.
<b>2. Special areas</b> <ul style="list-style-type: none"> <li>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</li> </ul>	The proposed signage is not located near environmentally sensitive areas, natural conservation areas, open space areas, waterways, or rural landscapes.	Yes.
<b>3. Views and vistas</b> <ul style="list-style-type: none"> <li>Does the proposal obscure or compromise important views?</li> <li>Does the proposal dominate the skyline and reduce the quality of vistas?</li> <li>Does the proposal respect the viewing rights of other advertisers?</li> </ul>	Given the scale of the proposed signage and its containment within the site, the proposal will not impact on the quality of views and vistas within the surrounds. The signage is located at car park entrances of the Westfield Warringah and will not obscure important views or viewing rights of advertisers.	Yes.
<b>4. Streetscape, setting or landscape</b> <ul style="list-style-type: none"> <li>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</li> <li>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</li> <li>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</li> <li>Does the proposal screen unsightliness?</li> <li>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</li> <li>Does the proposal require ongoing vegetation management?</li> </ul>	<p>The proposed signage has been specifically designed to be an appropriate scale, proportion and form that complements the building.</p> <p>The signage will contribute to the visual interest of the setting by providing a functional benefit of wayfinding for visitors. The proposed signage will not result in additional clutter.</p> <p>The proposed signage consists of cohesive simple lettering and does not screen unsightliness or protrude above any buildings or structures nor does it require ongoing vegetation management.</p>	Yes.
<b>5. Site and building</b> <ul style="list-style-type: none"> <li>Is the proposal compatible with the scale, proportion and other</li> </ul>	The proposed signage is compatible with the scale, proportion, and characteristics of the site and building. It is both suitable and functional,	Yes.

Criteria	Assessment	Compliance
<p><i>characteristics of the site or building, or both, on which the proposed signage is to be located?</i></p> <ul style="list-style-type: none"> <li>▪ <i>Does the proposal respect important features of the site or building, or both?</i></li> <li>▪ <i>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</i></li> </ul>	<p>demonstrating innovation through its dynamic nature. The signage digitally updates the number of available spaces at different parking locations within the centre, providing real-time information to the intended audience.</p>	
<p><b>6. Associated devices and logos with advertisements and advertising structures</b></p> <ul style="list-style-type: none"> <li>▪ <i>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</i></li> </ul>	<p>The proposal does not seek consent for advertising signage.</p>	<p>N/A</p>
<p><b>7. Illumination</b></p> <ul style="list-style-type: none"> <li>▪ <i>Would illumination result in unacceptable glare?</i></li> <li>▪ <i>Would illumination affect safety for pedestrians, vehicles or aircraft?</i></li> <li>▪ <i>Would illumination detract from the amenity of any residence or other form of accommodation?</i></li> <li>▪ <i>Can the intensity of the illumination be adjusted, if necessary?</i></li> <li>▪ <i>Is the illumination subject to a curfew?</i></li> </ul>	<p>A portion of the proposed wayfinding signage includes illuminated elements, featuring a backlit acrylic white vinyl to enhance legibility in the dark. The proposed signage is neither flashing nor moving. The illumination is minimal and will not impact the safety of pedestrians, vehicles or aircraft.</p>	<p>Yes</p>
<p><b>8. Safety</b></p> <ul style="list-style-type: none"> <li>▪ <i>Would the proposal reduce the safety for any public road?</i></li> <li>▪ <i>Would the proposal reduce the safety for pedestrians or bicyclists?</i></li> <li>▪ <i>Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</i></li> </ul>	<p>The proposed signage will not reduce safety on adjoining roads. The proposed signage is contained wholly within the site and will not obscure any sightlines and therefore is not considered to reduce safety of pedestrians nor of road users.</p>	<p>Yes.</p>

### 3.1.3. Warringah Local Environmental Plan 2011

*Warringah Local Environmental Plan 2011 (WLEP 2011)* the principle environmental planning instrument applying to the site.

The WLEP 2011 has the following relevant land use definitions

#### Signage:

*'Any sign, notice, device, representation or advertisement that advertises or promotes any goods, services or events and any structure or vessel that is principally designed for, or that is used for, the display of signage, and includes any of the following—*

- (a) *an advertising structure,*
- (b) *a building identification sign,*

*(c) a business identification sign, but does not include a traffic sign or traffic control facilities.'*

#### **Commercial premises:**

*commercial premises means any of the following—*

- (a) business premises,*
- (b) office premises,*
- (c) retail premises.*

#### **Zoning Permissibility and Objectives**

The proposal aligns with the relevant zone objectives and complies with relevant development standards, noting that the proposed works have no impact on the existing building height or floor space ratio.

The site is zoned E2 Commercial Centre and commercial premises are permissible with consent. The zone objectives are as follows:

- *To strengthen the role of the commercial centre as the centre of business, retail, community and cultural activity.*
- *To encourage investment in commercial development that generates employment opportunities and economic growth.*
- *To encourage development that has a high level of accessibility and amenity particularly for pedestrians.*
- *To enable residential development only if it is consistent with the Council's strategic planning for residential development in the area.*
- *To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.*
- *To recognise and support the role of Brookvale and Frenchs Forest as future employment centres for the Northern Beaches and the role of Warringah Mall as a retail centre of sub-regional significance.*

The proposal is permissible with consent at the site and comprises works to an approved car parking area associated with the commercial centre, being Westfield Warringah. The proposal will assist in better managing the parking at the site to allow the centre to operate more effectively and efficiently and will continue to serve the needs of people who work at and visit the centre.

The proposal is development for the purpose of managed parking with associated infrastructure and is therefore ancillary to the existing Westfield Warringah Mall retail and business premises, which is permitted within the E2 zone.

As such, the proposed use and associated works are permissible with consent at the site and will help to meet the objectives of the E2 zone.

The proposal also consists of, wayfinding and business identification signage. The land use table associated with Part 2 – Permitted or Prohibited Development of the WLEP 2011 confirms that the proposal is permissible with consent in the zone.

#### **Other Key WLEP 2011 Provisions**

The following table assesses the compliance of the proposed development with other relevant clauses in the LEP.

Table 2 LEP Compliance Table

Clause	Consistency
Clause 4.3 – Height of Building	The proposed development does not alter height of the existing building on site. The parking infrastructure is low in height and form.
Clause 4.4 – Floor Space Ratio	The proposed development does not alter the floor space ratio as no increase in GFA is proposed.
Clause 5.10 – Heritage Conservation	There are no heritage items located on site or in close proximity to the proposed works, and the site is not located in a heritage conservation area.
Clause 5.21 – Flooding Planning	<p>Under clause 5.21 of the WLEP 2011:</p> <p><i>(2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development –</i></p> <p><i>(a) is compatible with the flood function and behaviour on the land, and</i></p> <p><i>(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affection of other development or properties, and</i></p> <p><i>(c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and</i></p> <p><i>(d) incorporates measures to manage risk to life in the event of a flood, and</i></p> <p><i>(e) will not adversely affect the environmental or cause avoidable erosion, siltation, destruction of riparian vegetation or reduction in the stability of river banks or watercourses.</i></p> <p>An analysis of the stormwater and flooding impacts of the proposal have found that there is no impact on flooding or overland flow paths as a result of the proposed development, beyond what already is already approved and exists on the site. The proposed works will not adversely impact flood behaviours and does not interfere with any stormwater infrastructure above or below the surface. Stantec have provided a supporting statement to the application.</p>
Clause 6.1 – Acid Sulfate Soils	<p>Under clause 6.1 of the WLEP 2011</p> <p><i>(2) Development consent is required for the carrying out of works described in the Table to this subclause on land shown on the Acid Sulfate Soils Map as being of the class specified for those works.</i></p> <p><i>(3) Development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan as been prepared for the proposed works in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.</i></p> <p>A portion of the site for the proposed works is identified as being affected by class 4 and 5 acid sulfate soils. However, given that the excavation works are shallow, minor, and within an already disturbed car park area, there is minimal risk of disturbing acid sulfate soils. An Acid Sulfate Soil Management Plan will be prepared if deemed necessary.</p>



Clause	Consistency
Clause 6.2 – Earthworks	<p>Under clause 6.2 of the WLEP 2011:</p> <p>3. <i>Before granting development consent for earthworks, the consent authority must consider the following matters –</i></p> <ul style="list-style-type: none"> <li>(a) <i>the likely disruption of, or any detrimental effect on, existing drainage patterns and soil stability in the locality,</i></li> <li>(b) <i>the effect of the proposed development on the likely future use or redevelopment of the land,</i></li> <li>(c) <i>the quality of the fill or the soil to be excavated, or both,</i></li> <li>(d) <i>the effect of the proposed development on the existing and likely amenity of adjoining properties, Statement of Environmental Effects_ Westfield Warringah AVAC Sewer Station 12 Clause Provision</i></li> <li>(e) <i>the source of any fill material and the destination of any excavated material,</i></li> <li>(f) <i>the likelihood of disturbing relics,</i></li> <li>(g) <i>the proximity to and potential for adverse impacts on any watercourse, drinking water catchment or environmentally sensitive area.</i></li> </ul> <p>The proposed works relate to ticketless parking control system infrastructure that includes both a replacement of the existing ticketed equipment in a like for like a manner there are also locations where more extensive upgrades required that go beyond a direct 'bolt out' and 'bolt in' upgrade. The more extensive upgrades will require some below ground works however are considered to be shallow and minor in nature.</p> <p>A civil engineering statement has been provided at <b>Appendix G</b>.</p>

Based on the above, it is considered that the proposal complies with the relevant provisions within the WLEP 2011.

## 3.2. DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No draft environmental planning instruments are relevant to this proposal.

## 3.3. DEVELOPMENT CONTROL PLAN

*Warringah Development Control Plan 2011 (DCP)* provides detailed planning controls relevant to the site and the proposal. An assessment against the relevant controls is provided in the table below, with the key controls contained in the site specific provisions of Part G.

Clause	Provision	Proposed	Complies
<b>Part D Design</b>			
<b>Signs</b>	1. Signs are to be sited and designed so that they do not adversely impact on the amenity of the streetscape	The proposed wayfinding signage is located entirely within the car park of Warringah Mall and will not adversely impact the amenity of the streetscape.	Yes.

	and the surrounding locality. In particular, signs are not to dominate or obscure other signs or result in visual clutter.	Instead, it will assist visitors with navigation throughout the car park. The signs are designed and sited to ensure they do not dominate or obscure other signs, nor create visual clutter, thereby maintaining the visual amenity of the surrounding locality.	
2.	Signs are to be compatible with the design, scale and architectural character of the building or site on which they are to be placed.	The proposed signage will be compatible with the design, scale and architectural design and will remain consistent with the existing wayfinding signage on the site.	Yes.
3.	Signs on heritage items or on buildings in conservation areas should not by their size, design or colour, detract from the character or significant qualities of individual buildings, the immediate context or the wider streetscape context of the area.	Westfield Warringah Mall is not a heritage item or located within a conservation area.	N/A
4.	Signs are not to obscure views of vehicles, pedestrians or potentially hazardous road features or reduce the safety of all users of any public road (including pedestrians and cyclists).	The proposed signage will not obscure sightlines for pedestrians or vehicles. It is appropriately sized and scaled, and uses a cohesive colour scheme that is not distracting, ensuring it does not reduce the safety of any public road users, including pedestrians and cyclists.	Yes.
5.	Signs should not be capable of being confused with, or reduce the effectiveness of, traffic control devices.	The proposed signage uses language and colours that will not be confused with traffic control devices, ensuring it does not reduce their effectiveness.	Yes.
6.	Signs are not to emit excessive glare or cause excessive reflection.	The proposed signage is not reflective therefore will not emit excessive glare or reflection.	Yes.
7.	Signs should not obscure or compromise important views.	The proposed wayfinding signage is strategically positioned to ensure it does not obscure or compromise important views.	Yes.
	Signs displayed on dwellings are to be attached to the ground floor façade of the dwelling, unless the land is located on a main road or the dwelling is not visible from the street, in which case the sign may be attached to a front fence.	The proposed signage will not be displayed on a dwelling.	Yes.

9.	For Land in the RU4 zone with frontage to both Mona Vale Road and Myoora Road: Only small, non obtrusive and non illuminated signs that identify the use of a site are to be visible from Mona Vale Road. Signs that are designed of such size, height or visual appearance so as to attract passing trade are not considered appropriate and are discouraged. All signs are to be in keeping with the colour and textures of the natural landscape.	The site is not zoned as RU4.	Yes.
10.	No more than one sign is to be located above the awning level for business uses.	The proposed development does not involve works to awnings nor signage on awnings.	
11.	Tenancy boards and the like are encouraged to be in the form of consolidated signs.	The proposed development does not include tenancy boards.	Yes.
12.	<p>Signs shall meet the following criteria:</p> <ul style="list-style-type: none"> <li>▪ Pole or pylon sign (erected on a pole or pylon independent of any building or other structure) <ul style="list-style-type: none"> <li>– Shall not be less than 2.6 metres above ground level;</li> <li>– Shall not exceed 6 metres in height above the existing <a href="#">natural ground level</a>;</li> <li>– Must have a maximum area of no more than 4sqm on any single face;</li> <li>– Shall not project beyond the boundary of the premises; and</li> <li>– No more than one pole/pylon sign per site is permitted.</li> </ul> </li> <li>▪ <a href="#">Under awning sign</a> (attached to the underside of an awning) <ul style="list-style-type: none"> <li>– Shall not exceed 2.5m in length or 0.3m in height;</li> </ul> </li> </ul>	<p>The proposed pylon signage ranges from 3.295 metres to 4.650 metres in height and does not exceed the height controls, with a maximum area of 3.72 square meters. Additionally, the pylon signage does not project beyond the site boundary.</p> <p>The under-awning signage ranges from 1.2 meters to 2.4 meters in length and is 0.15 metres in height. This signage also does not project beyond the site boundary.</p> <p>The proposed development includes gantry signage that is 3.6 meters in length and 0.35 meters in height. The proposed signage is considered to be of appropriate size and scale and will replace the existing gantry signage.</p>	<p>On merit – Overall the purpose of the signage is not to display business names or retail signage per se but rather to assist in directing vehicles into and around the car parking areas improving the efficiency and utilisation of the car park. The signage is wayfinding and will ensure vehicle safety and improve legibility around the site. The Mall site is a large area and</p>

	<ul style="list-style-type: none"> <li>– Shall be no less than 2.7 m above the ground and at right angles to the property boundary to which the awning is attached;</li> <li>– Shall not project beyond the awning; and</li> <li>– No more than one under-awning sign may be erected per business/shop.</li> <li>–</li> </ul>		requires adequate associated signage.
	<p>13. The following signs are not considered appropriate and are discouraged:</p> <ul style="list-style-type: none"> <li>▪ Flashing or moving signs on all land other than the carriageway of a public road</li> <li>▪ Pole or pylon signs, unless there is no building on the site, or the building is not visible from the street or public domain; this does not include identification, interpretive, directional and advance warning signs described as Exempt Development, or a sign erected by the Council for the display of community information;</li> <li>▪ Signs on or above the roof or parapet of a building.</li> <li>▪ A-frame and temporary signs located on public land, including: <ul style="list-style-type: none"> <li>– Signs on motor vehicles which are not able to be driven with the sign displayed</li> <li>– Balloons or other inflatable objects used for the purpose of advertising which are placed on or above roof level</li> <li>– Illuminated signs in residential zones</li> </ul> </li> </ul>	<p>A portion of the proposed wayfinding signage includes illuminated elements, featuring backlit acrylic white vinyl to enhance legibility in the dark. The proposed signage is neither flashing nor moving.</p> <p>The proposed pylon signage serves as wayfinding within the car park. No temporary signage or signage on or above the roof is proposed as part of this development.</p>	Yes.
Part G Warringah Mall			
<b>Design Quality and Excellence</b>	<p>1. Future development on or adjacent to the perimeter of the site must be designed to</p>	<p>The proposed development is located within the existing car parking area. The proposed signage is replacing</p>	Yes.



	positively address the street, relate to the natural environment and create a clear distinction between the public and the private domain.	existing wayfinding signage and is of similar height and scale with simple lettering and cohesive colour scheme reflective of existing wayfinding signage design creating a clear distinction between the site and the public domain.	
2.	Future development on the site is to incorporate design elements that optimize the use of natural light and the ambient environment to the pedestrian malls within the centre.	The use of natural light is not necessary due to its nature as a ticketless car park control system.	
3.	New development along the southern edge of the site must not result in any unreasonable impacts on the amenity of residential properties in Old Pittwater Road and Smith Avenue.	<p>The proposed development does include signage on the southern entry to the car park from Old Pittwater Road.</p> <p>The proposed signage is consistent with the colour and lettering of the current blade signage. The proposed blade signage will replace the current sign and thus will not result in any unreasonable impacts of the amenity of the residential properties south of the site.</p>	Yes.
4.	New development along the eastern frontage to Pittwater Road/Condamine Street must incorporate a legible pedestrian connection from the street into the centre that is conveniently located in relation to existing bus stops.	The ticketless parking system is not proposed on the eastern frontage to Pittwater Road or Condamine Street.	N/A
6.	Long continuous walls are to incorporate design treatments to reduce their visual mass and bulk. Such design treatments may include the use of architectural treatments or elements that serve to provide building articulation and modulation and the use of a variety of high quality external colours and materials.	There are no walls proposed as part of the works.	N/A
7.	Views of the ground level car parking areas must be suitably screened from the street by either landscaping	Views of the ground level carparking area are not impacted by the proposed works.	Yes

		or an appropriate architectural building facade treatment.		
	8.	High quality, attractive and durable materials are to be used. The selection of colours is to respond to the natural landscape. A detailed schedule of external colours and finishes, a sample board and photomontages are to be submitted with any application to alter or extend the external façade and roof of Warringah Mall.	The proposed works relate to the development of a ticketless car park control system. The system will improve the access arrangements for customer, without the need for entry parking tickets. There are no changes proposed to the existing Warringah Mall on the site, the works are entirely contained within the parking area.	Yes
Advertising and Signage	31.	A 'Signage Strategy' is to be submitted with all development applications proposing a significant increase in floor area or change to external façades of the building. A Signage Strategy must also be submitted with any development application for the provision of signs. The Signage Strategy shall identify the number and location of proposed signs, and demonstrate how the signs will be integrated into the design of the development.	A signage strategy is not required as the proposed development does not propose any increase in floor area or changes to the external façade of the building.	Yes.
	32.	All illuminated signs are to comply with any relevant Australian Standards.	The proposed illuminated signage will comply with the relevant Australian Standards.	Yes.
Safety and Security	33.	Development is to be designed to incorporate and/or enhance opportunities for effective natural surveillance by providing clear sight lines between public and private places, installation of effective lighting particularly in public spaces and car parks, and the appropriate landscaping of public areas.	The proposed external works are considered minor in nature and are expected to have no adverse impacts on the existing natural surveillance of the area.	Yes.
	34.	The need for technical surveillance which is achieved through	The proposed development for the ticketless car park controls system provides CCTV surveillance that can	Yes.

	mechanical/electronic measures such as the provision of closed circuit television (CCTV), help points and mirrored building panels, is to be addressed in future developments.	be used to document vehicle accidents, vandalism and adverse behaviours. Within the control system there is a functionality to add problematic vehicles to a notification list which alerts the site team once the vehicle enters the property.	
	35. New development is to be designed to remove any opportunities for the concealment of crime.	As above.	Yes.
	36. The incorporation of crime prevention measures in the design of buildings and spaces is not to detract from the quality of the urban design of the development and the streetscape.	<p>The proposed development will incorporate crime prevention measures.</p> <p>The proposed development will use CCTV surveillance monitoring and number plate recognition. Considering the proposed works are minor in nature they will not detract from the quality of the urban design.</p>	Yes.
	37. The development is to be consistent with CPTED principles. A report providing an assessment of the proposal against CPTED principles is to be submitted with all development applications for additions to Warringah Mall.	<p>A report against the CPTED principles has not been submitted as part of the development application as the proposed development does not introduce new built form.</p> <p>The proposed ticketless system and signage will continue to allow for appropriate natural surveillance across the site, no areas of entrapment are created and good maintenance of all infrastructure is employed therefore a CPTED report is not required.</p>	Yes.
	38. A draft Operational Plan of Management that outlines the potential measures to be implemented to ensure the safety and security of the public is to be submitted with any development application involving a major expansion of Warringah Mall.	A Operational Plan of Management has been prepared with the application, refer to <b>Appendix E</b> .	
<b>Social Impacts</b>	39. A Social Impact Assessment (SIA) is to be submitted with a development application where there is the likelihood that the proposed development may significantly impact on the following matters: • Public Transport	The proposal involves minor infrastructure works as ancillary development to the Warringah Mall, thus no additional measures are required to ensure safety and security beyond what already exists throughout the centre.	Yes.

	<ul style="list-style-type: none"> <li>• Child care</li> <li>• Accessibility</li> <li>• Health facilities</li> <li>• Young people</li> <li>• Facilities for children</li> </ul> <p>Where an SIA is required, a targeted 'Community Stakeholder and Consultation Plan' LINK is to be developed and undertaken. The SIA is to identify opportunities to enhance existing community services or provide additional services to meet the community's needs.</p>		
<b>Road Infrastructure</b>	40. Significant additions to the floor area on the site will only be supported if traffic modelling is submitted with the development application which demonstrates that the surrounding road network can accommodate the additional traffic generated and that the network can continue to operate at a satisfactory level as determined by Council and the RTA.	The proposal does not result in an increase to the GFA.	Yes.
	41. New development applications for the significant expansion of Warringah Mall are to identify road upgrades and traffic management works in areas adjoining and nearby to the site to adequately accommodate growth in vehicle movements to and from the site.	The proposed works will improve the car park efficiency by streamlining the entry and exit arrangement, add wayfinding signage and will not create any detrimental impacts on the external road network, refer to <b>Appendix F</b> .	Yes.
	42. Future development is to incorporate measures to improve vehicle circulation within the site, where relevant.	The proposed development will improve the car park efficiency and internal circulation.	Yes.
	43. Vehicle access points from surrounding roads shall be provided in accordance with Figure 10.	The proposed development does not introduce additional access points to the site.	Yes.
	44. No additional vehicular entries are permitted from	As above.	Yes.



	Pittwater Road or Condamine Street excluding any future access or egress arrangements for buses associated with the proposed new bus interchange.		
<b>Pedestrian Access</b>	45. Main building entry points are to be clearly visible from primary street frontages and enhanced as appropriate with awnings, building signage or high quality architectural features that improve the clarity of a building's address and contribute to visitor and occupant safety and amenity.	<p>The proposed development does include wayfinding signage at the entrances of the car parking areas.</p> <p>The proposed signage is of high quality and uses a cohesive colour scheme and simple lettering that will assist motorists in navigating the car park area.</p>	Yes.
	46. New development is to ensure that existing pedestrian links from the surrounding area into the site are strengthened in the locations shown in Figure 11.	The proposed development does not alter the existing pedestrian links.	Yes.
	47. New development shall incorporate measures to achieve safe and continuous paths of travel from existing or proposed bus stops to the Shopping Centre and throughout Warringah Mall.	The proposed development will not alter existing pedestrian paths and as such the development continues to deliver safe and continuous paths of travel from the existing bus stops and shopping centre.	Yes.
	48. New development along the Cross Street / Green Street frontage shall incorporate enhanced pedestrian link(s) through to the existing centre.	The proposed signage along Cross Street and Green Street replaces existing signage and does not impact existing pedestrian link(s) through to Warringah Mall.	Yes.
	49. Safe pedestrian access is to be provided through the car parks.	The proposed development of the ticketless car parking system and wayfinding signage continues to provide safe pedestrian access throughout the car park.	Yes.
	50. Where new development is proposed along the Old Pittwater Road frontage of the site, an improved pedestrian link is to be provided from the TAFE site	The proposed development does include the replacement of existing wayfinding signage with new wayfinding signage at the car park entrance, however, does not include new built form therefore the improvement of the pedestrian link	Yes.

	to the pedestrian entrance of the centre.	from the TAFE to the site is not required.	
<b>Parking Facilities</b>	52. Car parking is to be provided at the rate of 4.1 spaces per 100 square metres of Gross Leaseable Floor Area unless it can be demonstrated that a lesser rate can still achieve sufficient parking provision to meet the needs of the shopping centre.	The proposed development will result in the loss of 28 car parking spaces. These lost spaces are primarily located near the new gates and are currently not well utilised, as they are more difficult to access and are not close to the shopping centre's pedestrian entry points.  The Westfield Warringah I will continue to meet the minimum car parking requirements.	Yes.
	53. Provision is to be made for the parking of motorcycles in easy to access and clearly visible locations.	The proposed development will not alter the existing motorcycle parking.	Yes.
	54. Car and motorcycle parking space dimensions must comply with the relevant Australian Standard. Note. AS/NZS 2890.1:2004 Parking Facilities - Off-street car parking applied at the time this DCP was adopted.	As above.	Yes.
	55. Bicycle parking and storage facilities shall be provided for any additional floor area proposed to allow parking or storage of a minimum number of bicycles, in accordance with the following; <ul style="list-style-type: none"> <li>▪ Bicycle storage facility – 1 per 300sqm</li> <li>▪ Bicycle parking facility – 1 per 500sqm</li> </ul> (h) This required provision may be reduced having regard to: The expected number of employees, and their likely or desired use of bicycles for travel to and from work. (i) The expected number of visitors, and their likely or desired use of bicycles to visit the development.	The proposed development does not alter the existing bicycle parking or storage facilities.	Yes.
	56. Bicycle parking and storage facilities shall be designed in accordance with the relevant	As above.	Yes.

<p>Australian Standard. <b>Note.</b> AS2890.3 - 1993 Parking facilities – Bicycle parking facilities applied at the time the DCP was adopted.</p>			
	57. Adequate shower and change room facilities for staff shall be located close to secure bicycle storage facilities.	N/A	N/A
Stormwater Management	59. Ground level development is to be avoided in the locations of the proposed concept drainage augmentation system as conceptually illustrated in <b>Figure 12</b> and in accordance with Council policy <i>PAS – PL 130: Building Over or Adjacent to Constructed Council Drainage System and Easements</i> .	The proposed development is not located in the areas designated of the proposed concept drainage augmentation system or obstruct below ground culverts.	Yes.
	60. Ensure that all new development on the site does not adversely impact upon the stormwater drainage system and any overland flow path through the site.	The proposed development is minor in nature and does not adversely impact upon the stormwater drainage system or any overland flow path through the site.	Yes.
	61. Ensure that all new development on the site does not adversely affect flooding conditions in existing development located both internal and external to the site.	The proposed development will not adversely affect flooding conditions	Yes.
	62. New buildings or extensions involving habitable areas are to be designed to prevent the entry of stormwater for floods up to 100 year ARI and all new habitable floor levels are to have a 500mm freeboard to the 100 year ARI flood.	There are no buildings or extensions involving habitable areas proposed as part of the development.	Yes.
	63. Structural measures are to be implemented on the site as part of any significant alterations to existing	The proposed development does not alter the existing building on the site.	Yes.

buildings that will ensure affected habitable floor levels have a 300mm freeboard to the 100 year ARI flood.

64. Structural measures are to be implemented on the site that ensure that overland flows are conveyed through the site in a low hazard nature for floods up to 100 year ARI. All new structural measures are to be confined, as far as is deemed practicable, to the site.

The proposed development does not cause any adverse impact on flooding or overland flow paths, refer to **Appendix G**.

Based on the above, it is considered that the proposal complies with the relevant provisions within the DCP.

### 3.4. PLANNING AGREEMENT

No planning agreements are relevant to this proposal.

### 3.5. REGULATIONS

This application has been prepared in accordance with the relevant provisions of the *Environmental Planning and Assessment Regulations 2021*.

### 3.6. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined in the sections below:

#### 3.6.1. Parking and Traffic Impacts

The technical design report has been prepared by SLR Consulting Australia and is attached at **Appendix F**. The report provides an analysis of the proposed ticketless parking control system and the associated impact on traffic generation, queues and parking capacity.

Several locations have been proposed for the replacement of existing ticketed equipment in a like-for-like manner, there are also locations where more extensive upgrades have been proposed that are beyond a direct bolt out and bolt in equipment upgrade. The more extensive upgrades will remedy the existing congestion issues. The proposed works will also include the consolidation of parking control points towards the extremities of the site to reduce the occurrences of internal nesting, whereby movements between one area of the car park and another may require multiple entry and exits from differed regions with the parking control system. In summary the proposal will:

- Increase car park efficiency with frictionless entry and streamlined exit arrangements, reducing the need for customer interaction with ticket machines.
- Improve the overall operation of the managed parking system by adding capacity, reducing "nested" parking control areas, and addressing current parking constraints.



- The minimal parking losses anticipated (less than 0.6%) will be more than offset by the efficiencies gained through improved egress, utilisation and wayfinding.

The assessment found that the proposed ticketless parking control system will enhance the efficiency of the current parking control system and provide an improved customer experience.

### **3.7. SUITABILITY OF THE SITE**

The site is considered highly suitable for the proposed development for the following reasons:

- The subject site is zoned E2 Commercial Centre, ancillary infrastructure works are permissible with consent in this zone.
- The proposal achieves a high level of compliance with the relevant State and local environmental planning instruments.
- The proposed ticketless car park control system will improve the efficiency of the car parking areas.

### **3.8. SUBMISSIONS**

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

Preliminary consultation has been undertaken with local bus operators, Keolis Downer Buses, as part of the development application and formal notification will occur post lodgement by Council.

### **3.9. PUBLIC INTEREST**

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

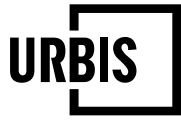
- The proposal complies with the relevant local planning controls.
- The proposed development will not result in any adverse environmental, social or economic impacts.
- The proposal will improve car park efficiency and internal circulation and improve the access arrangements and wayfinding for customers.

Having regard to the above and the suitability of the site for the proposed development, we consider the proposal upholds the public expectations for a functioning and modern shopping centre on the site.

## **4. CONCLUSION**

- The proposal is consistent with the applicable planning controls.
- The proposal will not result in any adverse environmental impacts.
- The proposal upgrades existing car parking infrastructure which will improve the functionality of the car park and improve car park efficiency and internal circulation.
- The proposal supports the function and efficient operation of Westfield Warringah Mall.

Accordingly, it is submitted that the proposal is in the public interest and should be approved subject to appropriate consent conditions.



Please do not hesitate to contact Naomi Daley or the undersigned should you wish to discuss our application in greater detail.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "N.G.", written in a cursive style.

Natalia Grodek  
Consultant  
+61 2 8233 9916  
ngrodek@urbis.com.au