



# **Statement of Environmental Effects**

## **Proposed alterations and additions to an existing industrial facility, offices and ancillary café**

4 – 10 Inman Road, Cromer  
Lot 1 DP1220196

**Prepared by Willowtree Planning Pty Ltd  
on behalf of EG**

**November 2019**

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

### Document Control Table

<b>Document Reference:</b>	WTJ19-423_Draft SEE_Cromer, 4-10 Inman Road.doc		
<b>Date</b>	<b>Version</b>	<b>Author</b>	<b>Checked By</b>
21 October 2019	1	E Burton	A Cowan
13 November 2019	2	E Burton	A Cowan

© 2019 Willowtree Planning (NSW) Pty Ltd

This document contains material protected under copyright and intellectual property laws and is to be used only by and for the intended client. Any unauthorised reprint or use of this material beyond the purpose for which it was created is prohibited. No part of this work may be copied, reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, recording, or by any information storage and retrieval system without express written permission from Willowtree Planning (NSW) Pty Ltd.

**TABLE OF CONTENTS**

<b>PART A</b>	<b>PRELIMINARY.....</b>	<b>5</b>
1.1	INTRODUCTION.....	5
<b>PART B</b>	<b>SITE ANALYSIS.....</b>	<b>13</b>
2.1	SITE LOCATION AND CHARACTERISTICS .....	13
2.2	SITE CONTEXT.....	14
<b>PART C</b>	<b>PROPOSED DEVELOPMENT.....</b>	<b>16</b>
3.1	OVERVIEW .....	16
3.2	DESCRIPTION OF THE PROPOSAL.....	16
3.2.1	DEMOLITION .....	17
3.2.2	CONSTRUCTION .....	18
3.3	DEVELOPMENT STATISTICS .....	19
3.4	OPERATIONAL DETAILS .....	20
<b>PART D</b>	<b>LEGISLATIVE AND POLICY FRAMEWORK.....</b>	<b>21</b>
4.1	STATUTORY PLANNING FRAMEWORK OVERVIEW .....	21
4.2	STATE LEGISLATION .....	21
4.2.1	ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979 .....	21
4.2.1.1	Section 4.15(1) of the EP&A Act .....	21
4.2.1.2	Section 4.46 of the EP&A Act – Integrated Development .....	21
4.2.2	ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000.....	22
4.2.3	HERITAGE ACT 1977 .....	22
4.2.4	WATER MANAGEMENT ACT 2000 .....	22
4.2.5	BIODIVERSITY CONSERVATION ACT 2016 .....	22
4.3	STATE PLANNING POLICIES .....	23
4.3.1	STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007 .....	23
4.3.2	STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND .....	23
4.4	REGIONAL AND LOCAL PLANNING PROVISIONS .....	24
4.4.1	WARRINGAH LOCAL ENVIRONMENTAL PLAN 2011.....	24
4.5	DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS.....	32
4.6	NON-STATUTORY PLANNING FRAMEWORK OVERVIEW .....	32
4.6.1	WARRINGAH DEVELOPMENT CONTROL PLAN 2011 .....	32
<b>PART E</b>	<b>LIKELY IMPACTS OF THE DEVELOPMENT.....</b>	<b>33</b>
5.1	CONTEXT AND SETTING.....	33
5.2	BUILT FORM .....	33
5.2.1	HERITAGE CONSIDERATIONS .....	34
5.3	TRAFFIC & TRANSPORT .....	36
5.4	STORMWATER & EROSION & SEDIMENT CONTROL .....	38
5.5	CONTAMINATION .....	39

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

5.6	VISUAL .....	39
5.7	NOISE .....	41
5.8	WASTE .....	42
5.8.1	CONSTRUCTION AND DEMOLITION WASTE .....	42
5.8.2	OPERATIONAL WASTE.....	42
5.9	HERITAGE .....	43
5.10	FLORA AND FAUNA .....	45
5.11	CUMULATIVE IMPACT.....	46
5.12	CONSTRUCTION .....	46
5.13	BUILDING CODE OF AUSTRALIA .....	46
5.14	SUITABILITY OF SITE FOR DEVELOPMENT .....	46
5.15	SOCIAL AND ECONOMIC IMPACTS .....	46
5.16	SUBMISSIONS.....	46
5.17	THE PUBLIC INTEREST .....	46
<b>PART F</b>	<b>CONCLUSION .....</b>	<b>48</b>

## APPENDICES

Appendix	Document	Prepared by
1	<b>BCA Statement</b>	SBA Architects
2	<b>Cost Summary Report</b>	Rider Levett Bucknall
3	<b>Clause 4.6 Variation Request</b>	Willowtree Planning
4	<b>WDCP2011 Assessment</b>	Willowtree Planning
5	<b>Survey Plan</b>	LTS Lockley
6	<b>Architectural Plans</b>	SBA Architects
7	<b>Landscape Plans</b>	Site Image
8	<b>Civil Engineering Report</b>	Costin Roe
9	<b>Conservation Management Plan</b>	Heritage 21
10	<b>Statement of Heritage Intent</b>	Heritage 21
11	<b>Transport Impact Assessment</b>	GTA Consultants
12	<b>Acoustic Impact Assessment</b>	Acoustic Dynamics
13	<b>Biodiversity Constraints Assessment</b>	Eco Logical
14	<b>Biodiversity Development Assessment Report</b>	Travers Bushfire & Ecology
15	<b>Tree Assessment</b>	Travers Bushfire & Ecology
16	<b>Preliminary Geotechnical Assessment</b>	JK Geotechnics
17	<b>Desktop Groundwater Assessment</b>	Douglas Partners
18	<b>Urban Design Review</b>	DFP Planning
19	<b>Waste Management Plan</b>	MRA Consulting Group

## FIGURES

Figure 1	Cadastral Map (Source: InfoTrack, 2019) .....	13
Figure 2	Aerial Map (Source: InfoTrack, 2019) .....	13
Figure 3	Existing Premises – view towards former Roche office building (Source: Domain, 2019) .....	14
Figure 4	Existing Premises – view from corner Inman Road and South Creek Road (Source: Domain, 2019).....	14
Figure 5	Site Context Map (Source: Google Maps, 2019) .....	15

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Figure 6	Current Site Diagram (Source: Heritage21, 2019) .....	15
Figure 7	Demolition Plan (Source: SBA Architects, 2019) .....	18
Figure 8	Site Plan (Source: SBA Architects, 2019) .....	19
Figure 9	WLEP2011 Zoning Map (Source: NSW Legislation, 2019) .....	24
Figure 10	Proposed property view from Inman Road looking towards South Creek Road (Source: SBA Architects, 2019) .....	34
Figure 11	Proposed property view looking towards the former Roche office building (Source: SBA Architects, 2019) .....	34
Figure 12	Current property view from corner of Inman and South Creek Road (Source: Domain, 2019) .....	40
Figure 13	Proposed property view from corner of Inman and South Creek Road (Source: SBA Architects, 2019) .....	40
Figure 14	Current property view from Inman Road entrance (Source: Google, 2019) .....	41
Figure 15	Proposed property view from Inman Road entrance (Source: SBA Architects, 2019) .....	41
Figure 16	WLEP2011 Heritage Map (Source: NSW Legislation, 2019) .....	43
Figure 17	Current property view from carpark towards former Roche main office building (Source: Heritage21, 2019) .....	44
Figure 18	Proposed property view from cottage cafe towards former Roche main office building (Source: SBA Architects, 2019) .....	44

## TABLES

Table 1	Pre-lodgement Notes .....	6
Table 2	Proposed Development Particulars (existing elements) .....	16
Table 3	Proposed Development Particulars (proposed elements) .....	18
Table 4	Development Statistics .....	19
Table 5	Operational Details .....	20
Table 6	Section 4.15(1)(A) Considerations .....	21
Table 7	Development Standards – WLEP2011 .....	25
Table 8	Height of Buildings Assessment .....	27
Table 9	Heritage Conservation Assessment .....	31
Table 10	Anticipated Parking Demand .....	37

## **PART A      PRELIMINARY**

### **1.1 INTRODUCTION**

This Statement of Environmental Effects (SEE) has been prepared by Willowtree Planning on behalf of EG, the proponent, and is submitted to Northern Beaches Council (Council) to support a Development Application (DA).

This DA seeks development consent for proposed alterations and additions to an existing industrial facility, for warehouse, industry and self-storage, office premises and ancillary café, at 4 – 10 Inman Road, Cromer (subject site), more formally described as Lot 1 DP1220196.

The subject site was home to the former Roche Pharmaceutical Corporate and Manufacturing Campus situated on the periphery of the Cromer Industrial Precinct, which has been inactive for a number of years. The subject site is approximately 7.5 hectares in area, currently zoned IN1 General industrial, and is in common ownership. It is one of the largest employment zoned sites in the Northern Beaches local government area (LGA) and is therefore a strategically significant site, not only within the LGA but within the North District.

The subject site offers the potential for a diverse range of local urban service outcomes, including creative and hi-tech industries, modern warehousing local business 'start-up' incubators and a place for innovation.

The specific aim of this proposal is to seek development consent for:

- Retention and conservation of heritage buildings 01, 02, 06, the hexagonal tower, the internal courtyard, and the post-World War II cottage (building 05);
- Repurposing of the of the post-World War II cottage for an ancillary café use;
- Demolition of existing non-heritage buildings;
- Maintain the potential to use buildings 02 and 06 as commercial offices;
- Earthworks;
- Tree removal;
- Construction of eleven (11) warehouse units and ancillary offices;
- Construction of self-storage units
- Construction of hardstand and carparking for 231 vehicles, including basement carpark;
- Retention of soft landscaping, with introduction of additional soft landscaping;
- Introduction of historic interpretive measures and displays.

This SEE has been prepared pursuant to Section 4.12 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Clause 50 and Part 1 of Schedule 1 of the Environmental Planning and Assessment Regulations 2000. Assessment against the relevant matters for consideration under Section 4.15(1) of the EP&A Act has also been carried out.

Based on the assessment undertaken, the proposal is considered to have planning merit and it is recommended that favourable consideration be given.

### **1.2 DEVELOPMENT HISTORY**

The subject site comprises one large allotment, including laboratory, factory, warehouse buildings, administrative offices and stores, previously occupied by Roche. The buildings are predominantly located in the south western portion of the subject site and are accessible via Inman Drive and South Creek Road.

The subject site has been significantly developed over time and includes a variety of buildings and structures, ranging in age from the 1920s through to 2006. The earlier buildings include an inter-war and post-war cottage, whilst the majority of the buildings relate to the current operation of the subject site.

A detailed description of the subject site's history is included in the Conservation Management Plan, prepared by Heritage 21, which is contained in **Appendix 9**.

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

It is noted that the existing buildings have been designed for very specific purposes and many are considered inappropriate for adaptive reuse. The floor to floor heights are not suitable for warehousing or other uses that might be considered in this location. There is very limited demand for the commercial occupants in the retained former Roche administrative buildings. However, the proponent is envisaging a range of potential uses and the adaptive re-use of these spaces, where their use in ancillary offices is not possible.

### 1.3 PRE-LODGEEMENT CONSULTATION

A Pre-Lodgement Meetings (PLM2019/0106) have been held with Council; the most recent being 9 September 2019. Attendees for Council included:

- Daniel Milliken – Acting Manager Development Assessments
- Dominic Chung – Senior Urban Designer
- Janine Formica – Heritage Planner
- Bob Moore – Heritage Advisor
- Rob Barbuto – Principal Engineer Major Developments
- Patrick Bastawrous – Senior Engineer Traffic
- Anthony Foy – Environmental Health Officer

The following notes were provided by Council and commentary against each matter has been provided in **Table 1** below.

Table 1 Pre-lodgement Notes	
Council Comments	Applicant Response
<b>Meeting notes – 11 June 2019</b>	
<b>Zoning and Permissibility</b>	
Definition of proposed development: Warehouse and self-storage facility – permissible Office premises – prohibited Kiosk / restaurant or café – prohibited Take away food and drink premises – permissible	The proposal seeks development consent for the following aspects of development: <ul style="list-style-type: none"><li>▪ Warehouse and self-storage facility</li><li>▪ Office premises</li><li>▪ Café</li></ul> The office premises and café are proposed to afford adaptive reuse of existing character buildings, which are not deemed suitable for industry-type uses. As such, enactment of Clause 5.10(10) is requested.
<b>Principal Development Standards</b>	
Height of buildings:	
The plans provided at the meeting indicated a substantial non-compliance. The current height of the proposal will not be supported and it is strongly recommended that the design be amended to better comply with the 11m height limit.	The proposal has undergone significant redesign to better align with statutory requirements.
<b>Built Form Controls</b>	
Side boundary setbacks:	
The proposed side boundary setbacks (12m) provide adequate physical separation to the nearby development. The proposal is satisfactory subject to suitable hours of operation and the submission of an acoustic report demonstrating that no unreasonable impacts on the neighbouring properties.	Suitable boundary setbacks have been maintained as part of this proposal, and an Acoustic Assessment, prepared by Acoustic Dynamics ( <b>Appendix 12</b> ), is included to offer relevant specialist advice.



**Statement of Environmental Effects**

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

<b>Table 1 Pre-lodgement Notes</b>	
<b>Council Comments</b>	<b>Applicant Response</b>
Front boundary setbacks:	
The proposal complies with 4.5m setback requirement.	Suitable boundary setbacks have been maintained as part of this proposal.
Parking facilities:	
The development is to comply with the minimum parking requirement. The calculations on the pre-lodgement design found that the development includes a significant non-compliance with the parking requirement. The proposal does not provide adequate parking to meet the demands of the development. The non-compliance is not support by Council.	The proposal is considered to cater for car parking in line with expected demand. A Transport Impact Assessment, prepared by GTA Consultants ( <b>Appendix 11</b> ), is included to offer relevant specialist advice.
<b>Specialist Advice</b>	
Heritage and Urban Design:	
– the following Council comments (by Janine Formica via email on 19 Sept 2019) supersede prior heritage comments	
1. The substantive measures offered in the revisions brought to the meeting were the retention of the rear wing, hitherto proposed for demolition, and the setback of the corner building behind the front building line of the listed office building. These are welcome advances from the earlier schemes offered and promise a much better outcome.	The proposal has maintained its better alignment with statutory requirements and ensures seamless integration with the existing premises.
2. The treatment of the new corner building - in its height and glazing - appears to be the best yet offered and although a reduction or step back in height at the front parapet level would be a further great improvement, I understand the internal arrangement for warehousing purposes makes for a compelling argument as to why this cannot be done.	The proposal has incorporated a recessed corner to further articulate the proposed building façade.
3. It may be that by varying the colour and surface finish of the corner building from the "bright white" finish of the listed building, a recessive effect can be gained to assist the heritage item's promotion. A relatively "off white" presentation might assist with a further suggestion of the relative importance of the buildings. This might extend to the storage units as well.	The proposal has been amended to include colour and surface finishes that present different grey tones.
4. The open space/setback of the vehicle circulation from the rear wing should allow for a supportive landscape setting to be achieved, with good amenity for the retained building and its likely office use. This will be further helped by the separating 'gap' to the warehousing on the other side. This should help with the commercial appeal of the retained heritage buildings relative to the likely more prosaic storage units at the rear bounds of the site.	The proposal has maximized the open area between the retained buildings and the proposed warehouses, ensuring that the presence of the retained buildings and their associated character would maintain a prominence on site.
5. Although the relative setback distance of the storage units along the rear of the site will assist in reducing their challenge to the heritage item, the use of dark glazing in a band along the upper wall area, below the roof line, might further help reduce their relative prominence in mid-distance views, as suggested by	The proposal has the ability to provide dark glazing in a band along the upper wall area, below the roof line, of the rear warehouse facades.



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 1 Pre-lodgement Notes	
Council Comments	Applicant Response
the drawings discussed at the meeting.	
6. This leaves the issues surrounding retention of the rearmost, signature tower of the complex, whose treatment remains to be resolved in terms of fabric retention, and treatment of its lowest sections where foundation support and engagement with the new building work are as yet unclear, Retention would be preferable to reconstruction, if this can be achieved, and how this part of the building is to be supported and built in with its new context are obviously critical issues. The smaller polygonal "tower" is of lesser importance to the outcome and its reconstruction, as would appear to be necessary if it were to be "kept", would serve little heritage conservation purpose in my opinion.	The proposal has ensured the retention of the large hexagonal Roche tower, which will be maintained as key aspect of the original development and historic operations.
7. This leaves the detailed treatment of the retained cottage, proposed to be a cafe tenancy, and its setting the overall frontage fencing of the site to be resolved. There should be no great difficulty in ensuring that these parts of the overall scheme are supportive of the whole.	The proposal has retained the historic cottage and intends to adaptively reuse as a café.
The scheme now on the table is now the most positive yet discussed, and although further work needs to be done, in the direction of structural clarifications and the overall architectural presentation of the new work, the scheme now looks to be supportable in heritage terms, with the provisos offered in the comments above.	The proposal has maintained and enhanced its better alignment with statutory requirements and ensures seamless integration with the existing premises.
We are very happy that the applicants have prepared a Conservation Management Plan for the site, which forms a sound basis for future heritage management decisions on the site. We are also happy that they are retaining parts of the original Roche complex, however it is considered that with a re-design, a better heritage outcome is possible.	The Conservation Management Plan ( <b>Appendix 9</b> ), prepared by Heritage 21, is included to offer relevant specialist advice.
A Heritage Impact Statement must be submitted with any DA, which addresses the specific impact of the proposal on the identified heritage significance of the item.	The Statement of Heritage Intent ( <b>Appendix 10</b> ), prepared by Heritage 21, is included to offer relevant specialist advice.
Environmental Health:	
1. Site contamination issues and remediation, current status and proposals.	It is understood that Roche, in conjunction with ERM, are in the process of undertaking the necessary remediation works.  Further details are included in <b>Section 5.5</b> .
2. An acoustic assessment in regard to the neighbouring residential premises particularly noting reversing trucks, forklifts, use of industrial premises and self-storage units and hours of use and management. Likewise, any proposed mechanical ventilation or plant.	An Acoustic Assessment, prepared by Acoustic Dynamics ( <b>Appendix 12</b> ), is included to offer relevant specialist advice.
3. Café fit out to comply with Australian Standard AS 4674-2004 – 'Design, Construction and fit-out of food premises'. NB Sydney Water may require a grease	Understood and noted.

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

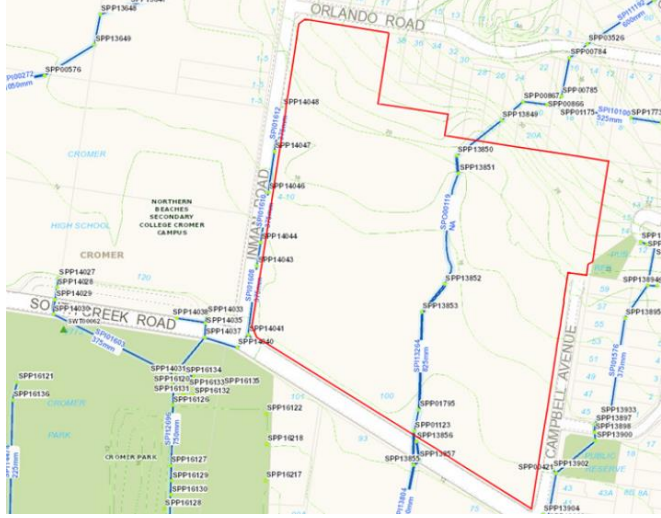
WTJ19-423

<b>Table 1 Pre-lodgement Notes</b>	
<b>Council Comments</b>	<b>Applicant Response</b>
trap. Smoke and odour issues from mechanical ventilation for the café are not anticipated to be an issue in this location.	
Environmental Officer:	
The proposal appears to show a design which avoids impacts to biodiversity values, namely existing native canopy trees, which appear to be able to be retained under the current design. An Arborist report prepared by a qualified Arborist with a minimum AQF 5 is required.	A Biodiversity Constraints Assessment, prepared by Eco Logical ( <b>Appendix 13</b> ), and Biodiversity Development Assessment Report, prepared by Travers Bush ( <b>Appendix 14</b> ), is included to offer relevant specialist advice.
Indirect impacts to biodiversity, including threatened species and their habitat, must be considered within DA documentation, including potential increases in artificial lighting from the proposed development into the adjoining vegetation to the east, and likely impacts during construction. Documentation detailing any proposed mitigation measures to minimise indirect and construction impacts is required.	A Biodiversity Constraints Assessment, prepared by Eco Logical ( <b>Appendix 13</b> ), and Biodiversity Development Assessment Report, prepared by Travers Bush ( <b>Appendix 14</b> ), is included to offer relevant specialist advice.
Landscape Advisor:	
<ul style="list-style-type: none"> <li>The retention of trees and landscape elements around the perimeter of the site is supported.</li> </ul>	This matter is maintained.
<ul style="list-style-type: none"> <li>The use of existing driveway entries is supported.</li> </ul>	This matter is maintained.
<ul style="list-style-type: none"> <li>Any application will require submission of an Arborist's Report indicating trees to be removed (hopefully none) and retained and tree protection measures.</li> </ul>	A Biodiversity Constraints Assessment, prepared by Eco Logical ( <b>Appendix 13</b> ), and Biodiversity Development Assessment Report, prepared by Travers Bush ( <b>Appendix 14</b> ), is included to offer relevant specialist advice.
<ul style="list-style-type: none"> <li>Landscape plans prepared by a qualified landscape designer or landscape architect will be required to be submitted addressing planting to be retained and removed and new planting scheme, being mindful of the heritage listing of the site.</li> </ul>	Landscape Plans, prepared by Site Image ( <b>Appendix 7</b> ), are included to offer relevant specialist advice.
<ul style="list-style-type: none"> <li>Sites of Aboriginal significance are located in the northern portion of the site, though no works are indicated in this area. Referral to AHO will likely be required if a DA is lodged.</li> </ul>	Understood and noted.
Engineer – Stormwater Assets:	
<p>The development site is burdened by a 825mm drainage pipe and an open channel as shown on the Council stormwater map below.</p> <p>All vertical and horizontal clearances to the existing stormwater assets / related easements needs to be maintained to satisfy the Council requirements.</p> <p>Any changes to divert existing course of the stormwater drainage paths require prior approval of proposals in consultation with the Council's Stormwater &amp; Flood Plain Engineering section.</p>	A Civil Engineering Report, prepared by Costin Roe ( <b>Appendix 8</b> ), is included to offer relevant specialist advice.

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 1 Pre-lodgement Notes	
Council Comments	Applicant Response
	
Please find below our standard comments in relation to the above site (not reviewed by team leader Dean McNatty):	
<ul style="list-style-type: none"> <li>Council's records indicate that 4-10 Inman Road Cromer is burdened by a 825mm pipe and an open channel drainage path and associated infrastructure. This is shown on Council's stormwater map.</li> </ul>	A Civil Engineering Report, prepared by Costin Roe ( <b>Appendix 8</b> ), is included to offer relevant specialist advice.
<ul style="list-style-type: none"> <li>To demonstrate compliance with Council's Development Control Plan – Northern Beaches Council's Water Management Policy PL 850 Water (section 6 – Building Over or Adjacent to Council Drainage Systems and Easements), it is recommended that the following details are submitted with any application. <ul style="list-style-type: none"> <li>Accurately located, confirm dimensions including depth and plot to scale Council's stormwater pipelines and associated infrastructure on the DA site plans that outline the proposal. This should be carried out by a service locating contractor and registered surveyor.</li> <li>If the Applicant proposed to use a CCTV pipeline survey to confirm the location of the pipeline, it is recommended that the survey is carried out in accordance with Council's guideline attached.</li> <li>All structures are to be located clear of any Council pipeline, pit or easement.</li> <li>Footings of any structure adjacent to an easement or pipeline are to be designed in accordance with the above-mentioned Policy.</li> <li>Structural details prepared by a suitably qualified Civil Engineer demonstrating compliance with Council's policy are to be submitted.</li> </ul> </li> </ul>	A Civil Engineering Report, prepared by Costin Roe ( <b>Appendix 8</b> ), is included to offer relevant specialist advice.
Documentation to accompany the Development Application:	

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

[illegible]

**Statement of Environmental Effects**

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

<b>Table 1      Pre-lodgement Notes</b>	
<b>Council Comments</b>	<b>Applicant Response</b>
further feedback will be provided. A further prelodgement meeting may be required as the design is refined and DA lodgement approaches.	







## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423



**Figure 3** Existing Premises – view towards former Roche office building (Source: Domain, 2019)



**Figure 4** Existing Premises – view from corner Inman Road and South Creek Road  
(Source: Domain, 2019)

## 2.2 SITE CONTEXT

The subject site is located at 4 – 10 Inman Road, Cromer, also known as 100 South Creek Road, Cromer, and is identified as the former Roche Products Australia premises. The subject site is bound by South Creek Road to the south and Inman Road to the west. The north-western corner of the site is bound by Orlando Road, which connects to Parkes Road. The subject site also has frontage to Campbell Avenue, however the proposed development does not extend to this part of the site. The remainder of the subject site shares a common boundary with existing residential dwellings and childcare centre to the north.

The subject site is zoned IN1 General Industrial, pursuant to the *Warringah Local Environmental Plan 2011* (WLEP2011) and includes mostly office buildings and large warehouse/manufacturing buildings. Zones surrounding the subject site include RE1 – Public Recreation, RE2 – Private Recreation, SP2 – Infrastructure, and R2 – Low Density Residential.



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Located twenty (20) kilometers from the Sydney CBD, the subject site is close to the newly constructed Northern Beaches Hospital, the B-line project for improved bus services to the CBD, and the recently announced Beaches Link Tunnel project. It is also near to the Dee Why Town Centre, which is undergoing significant urban renewal.



**Figure 5 Site Context Map** (Source: Google Maps, 2019)

The subject site has been significantly development and includes a variety of buildings and structures, ranging in age from the 1920s through to 2006. Three (3) separate heritage listings apply to the subject site, under the WLEP 2011, being; Item 52: 'Roche Building'; Item 53: 'Givaudan-Roure Office'; and Item 38: 'Trees'.



**Figure 6 Current Site Diagram** (Source: Heritage 21, 2019)

## PART C PROPOSED DEVELOPMENT

### 3.1 OVERVIEW

This DA seeks development consent for proposed alterations and additions to an existing industrial facility for warehouse, industry and self-storage, office premises and ancillary café at the subject site, comprising:

- Retention and conservation of buildings 01, 02, 06, the hexagonal tower, the internal courtyard, and the post-World War II cottage (building 05);
- Repurposing of the of the post-World War II cottage for an ancillary café use;
- Maintained potential use of buildings 02 and 06 as commercial offices;
- Demolition of existing non-heritage buildings, being buildings 03, 07, 09, 11, 18, 22, 44, and structures 20, 45, 46, 48;
- Earthworks;
- Tree removal;
- Construction of eleven (11) warehouse units and ancillary offices;
- Construction of underground self-storage units
- Construction of hardstand and carparking for 231 vehicles, including basement carpark;
- Retention of soft landscaping, with introduction of additional soft landscaping.

The following objectives have been identified as forming the basis of the proposed development, as well as being consistent with the aims set out within the WLEP2011, including:

- Intensifies employment and urban service outcomes within the western half of the subject site;
- Ensures sympathetic reuse of the subject site, including maintenance of the industrial character of the land in its existing landscaped setting;
- Promotes an economically sustainable development, and reinforcing the status of an employment-generating development that positively contributes to the Northern Beaches area;
- Encourages assurance for the coordinated planning and development of land;
- Ensures minimal environmental and amenity impacts; and
- Ensures development is compatible with surrounding development and the local context.

The proposed development would meet the objectives identified above as it enables development of land that has been zoned for industry and related uses.

### 3.2 DESCRIPTION OF THE PROPOSAL

Development consent is sought for proposed alterations and additions to an existing industrial facility, in the form of warehouse, self-storage units, offices and ancillary café. Operational use of the facility would be for warehousing and industry-related uses, the adaptive re-use of the existing office building as commercial office premises, and an onsite café providing ancillary services to meet the day to day needs of workers in the area.

The following table (Table 2) specifies the development parameters proposed as part of this DA. The building identifiers listed have been adapted from the Heritage 21 reporting.

**Figure 7** includes the current site plan, with the relevant building identifiers.

<b>Table 2 Proposed Development Particulars (existing elements)</b>		
<b>Project Element</b>	<b>Building Identifier (where applicable)</b>	<b>Development Particular</b>
<b>Demolition of non-heritage buildings</b>		
Warehouse	B03	Complete demolition
Offices	B07	Complete demolition

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

**Table 2 Proposed Development Particulars (existing elements)**

Project Element	Building Identifier (where applicable)	Development Particular
Warehouse	B09	Complete demolition
Energy building	B11	Complete demolition
Warehouse	B18	Complete demolition
Storage	B20	Complete demolition
Offices	B22	Complete demolition
Squash courts	B40	Complete demolition
Gate house	B41	Complete demolition
Shed	B42	Complete demolition
Temporary offices	B44	Complete demolition
Generator station	B47	Complete demolition
Plant room	B48	Complete demolition
Tennis court	B51	Complete demolition
Tanks and pump house	B52 – B57	Complete demolition
<b>Retention and conservation of buildings</b>		
Main office building	B01	Retention and conservation Ground floor: 309m <sup>2</sup> Level 1: 401m <sup>2</sup>
Main office building	B02	Retention and conservation Ground floor: 570m <sup>2</sup>
Cottage (Inman Road)	B05	Retention, conservation and adaptive reuse Ground floor: 124m <sup>2</sup>
Main office building	B06	Retention and conservation Basement: 775m <sup>2</sup> Ground floor: 1,124m <sup>2</sup>
Existing hexagonal sign	B11	Adaptive re-use
Out of scope	B08	Does not form part of this proposal
Out of scope	B17	Does not form part of this proposal
Out of scope	B19	Does not form part of this proposal

### 3.2.1 DEMOLITION

To facilitate the proposed development, demolition of several items is proposed, as described in Table 2 and illustrated in **Figure 7**.

These items were designed for very specific purposes and are considered inappropriate for adaptive reuse. The floor to floor heights are not suitable for warehousing or other uses that might be considered in this location. There is very limited demand for activities that could be accommodated in an adapted office/lab type building. In this regard, there would be a challenge to find uses that could be accommodated in the buildings proposed for demolition.

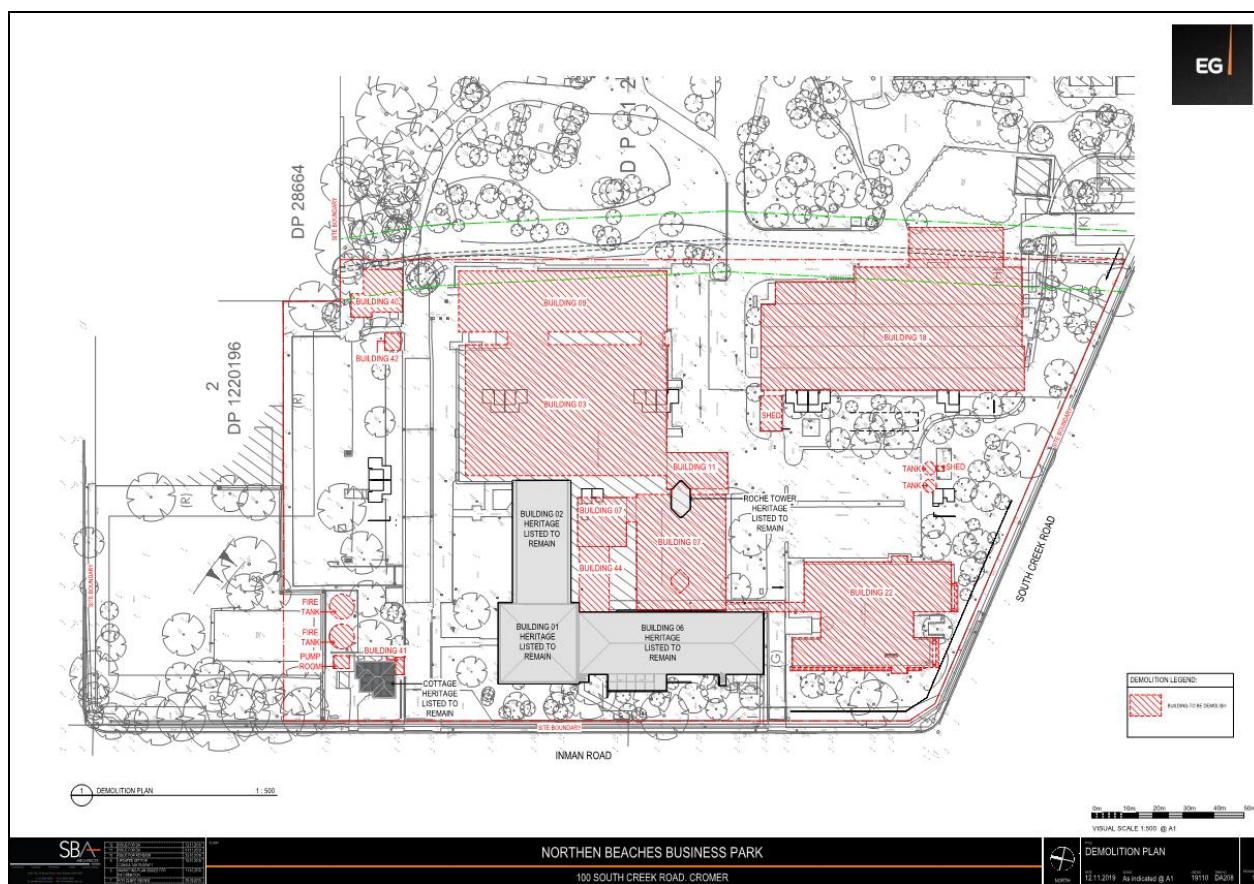
The proposed demolition has been justified and supported through a detailed significance assessment, conducted via the Conservation Management Plan (**Appendix 9**) and Statement of Heritage Intent (**Appendix 10**) prepared by Heritage 21.



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423



**Figure 7** Demolition Plan (Source: SBA Architects, 2019)

### 3.2.2 CONSTRUCTION

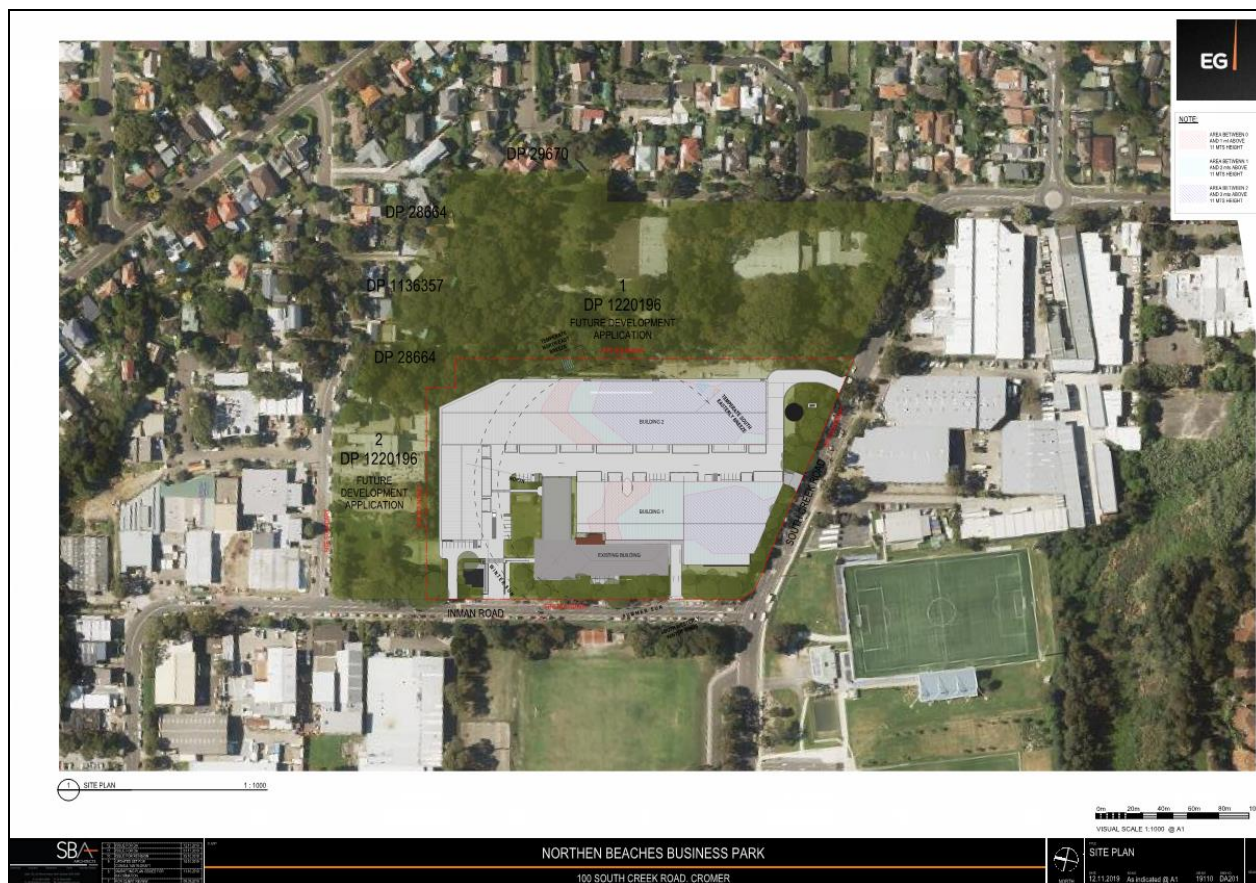
Other proposed development particulars are included in **Table 3**.

Table 3 Proposed Development Particulars (construction elements)		
Project Element	Identifier (where applicable)	Development Particular
<b>Construction</b>		
Warehouse and office	Unit 1	Warehouse: 1,045m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 2	Warehouse: 1,322m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 3	Warehouse: 1,491m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 4	Warehouse: 1,020m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 5	Warehouse: 1,020m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 6	Warehouse: 1,020m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 7	Warehouse: 1,020m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 8	Warehouse: 1,020m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 9	Warehouse: 1,020m <sup>2</sup> ; Office: 150m <sup>2</sup>
Warehouse and office	Unit 10	Warehouse: 3,396m <sup>2</sup> ; Office: 250m <sup>2</sup>
Warehouse and office	Unit 11	Warehouse: 2,130m <sup>2</sup> ; Office: 250m <sup>2</sup>
Self storage	N/A	3,902m <sup>2</sup>

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423



**Figure 8** Site Plan (Source: SBA Architects, 2019)

### 3.3 DEVELOPMENT STATISTICS

The proposed works and associated parameters are identified in **Table 4** below.

Table 4 Development Statistics	
Component	Proposed Development
Site Area	37,031m <sup>2</sup>
Building Type	Warehouse, self-storage units, commercial offices and café
Gross Floor Area	24,560m <sup>2</sup>
Floor Space Ratio	0.66:1
Building Height	Up to a maximum of 13.83m
Number of Storeys	Two (2)
Number of tenancies/units	11 warehouse units 5 office tenancies
Landscaping	Soft landscaping along Inman Road and South Creek Road are to be maintained and enhanced by additional soft and hard landscaping throughout the proposed development.
Earthworks	Cut/fill and retaining is proposed.
Roads / Driveways	There are three separate site accesses proposed along Inman Road, as follows: <ul style="list-style-type: none"> <li>a two-way visitor car park access (new driveway)</li> <li>a two-way at-grade car and truck to the light industrial/warehouse units (existing driveway location)</li> <li>a two-way basement car park access (existing driveway location).</li> </ul>

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

**Table 4 Development Statistics**

Component	Proposed Development
	A further two separate site accesses are proposed along South Creek Road, as follows: <ul style="list-style-type: none"><li>a two-way access to the self-storage facility (new driveway)</li><li>an exit only access from the light industrial/ warehouse units (existing driveway location).</li></ul>
Car Parking	231 car spaces
Bicycle Parking	Bicycle parking is not currently shown on the proposed plans, however the required 39 spaces can be readily accommodated on site.
Tree Removal	53 trees to be removed
Signage	<ul style="list-style-type: none"><li>on retained hexagonal tower</li><li>at entries/exits on South Creek Road and Inman Road</li><li>at the corner of South Creek Road and Inman Road</li><li>on warehouse units</li></ul>
Infrastructure and Servicing	The subject site and its proposed development can be adequately serviced.
Cost of Works	\$44,590,000.00

### 3.4 OPERATIONAL DETAILS

This proposal seeks to redevelop the subject site to align with market demand. The proposed redevelopment of the site will include eleven (11) warehouse units with mezzanine offices, a further five (5) office tenancies (located within the former Roche offices), an underground self-storage facility and a café within the existing cottage, totalling 24,560m<sup>2</sup> gross floor area (GFA). The proposed commercial office space will only account for 20 per cent of the total GFA, compared to the current 45 per cent for the existing on-site facilities.

The proposal would operate as mixed-use facility.

**Table 5 Operational Details**

Component	Proposed Development
Nature of Use	Warehouse/industry, self-storage units, commercial offices and café
Hours of operation	N/A – the proposal includes speculative uses only
Vehicle types	20-metre-long articulated vehicle (maximum)
Number of vehicle movements	Estimated 164 and 175 vehicle trips in the AM and PM peak hours respectively.



## **PART D LEGISLATIVE AND POLICY FRAMEWORK**

### **1.1 STATUTORY PLANNING FRAMEWORK OVERVIEW**

This Part of the SEE assesses and responds to the legislative and policy requirements for the project in accordance with the *Environmental Planning and Assessment Act 1979* (EP&A Act). The statutory planning framework relevant to the preparation of the SEE includes:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Heritage Act 1977*
- *Water Management Act 2000*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 55 – Remediation of Land*

### **1.2 STATE LEGISLATION**

#### **1.2.1 ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979**

The EP&A Act is the principle planning and development legislation in New South Wales. Pursuant to Part 4, the proposal is local development.

##### **1.2.1.1 Section 4.15(1) of the EP&A Act**

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a DA. The relevant matters for consideration under Section 4.15(1) of the EP&A Act are provided in **Table 6** below.

<b>Table 6 Section 4.15(1)(A) Considerations</b>	
<b>Section</b>	<b>Response</b>
Section 4.15(1)(a)(i) any environmental planning instrument, and	All relevant environmental planning instruments are addressed in <b>Part D</b> of this SEE.
Section 4.15(1)(a)(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), and	N/A.
Section 4.15(1)(a)(iii) any development control plan, and	<b>Section 1.6.1</b> and <b>Appendix 2</b> of this SEE.
Section 4.15(1)(a)(iia) 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, and	N/A.
Section 4.15(1)(a)(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The EP&A Regulation is addressed in <b>Section</b> Error! Reference source not found. of this SEE.
Section 4.15(1)(b)-(c)	Refer to <b>Part E</b> of this SEE.

##### **1.2.1.2 Section 4.46 of the EP&A Act – Integrated Development**



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Section 4.46 of the EP&A Act defines 'integrated development' as matters which require consent from Council and one or more authorities under related legislation. In these circumstances, prior to granting consent, Council must obtain from each relevant approval body their General Terms of Approval (GTA) in relation to the development.

The proposed development is not considered integrated development. It is noted that the heritage items associated with the subject site are not listed on the State Heritage Register.

### 1.2.2 ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000

The proposal has been prepared in accordance with the provisions of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). Clause 50 and Part 1 of Schedule 1 of the EP&A Regulation stipulates how a DA must be "made". This DA satisfies the relevant criteria of the Regulation as follows:

- Clause 50(1)(a) – All required documentation has been provided in the ensuing sections of this report.

Further, the proposal does not trigger 'Designated Development' pursuant Schedule 3 of the EP&A Regulation.

### 1.2.3 HERITAGE ACT 1977

The *Heritage Act 1977* protects the cultural and natural history of NSW and those items identified as State or local heritage significance.

The subject site is listed as an item of environmental heritage in Schedule 5 of the WLEP2011. However, the subject site is not listed on any other statutory or non-statutory lists or registers.

The subject site comprises three (3) items of environmental heritage, all of which are listed under Schedule 5 of the WLEP2011. Clause 5.10(4) and 5.10(5) of the WLEP2011 require Council to assess the potential heritage impact of non-exempt development, such as the proposed works, on the heritage significance of said heritage items, and also assess the extent to which the proposal would impact the heritage significance of those heritage items.

Heritage 21 have prepared a Conservation Management Plan (**Appendix 9**), to inform a programme of proposed future works at the subject site, and a Statement of Heritage Impact (**Appendix 10**), relating to the proposed development that forms part of this application.

Refer to **Section 5.9** of this SEE for further detail.

### 1.2.4 WATER MANAGEMENT ACT 2000

The object of the *Water Management Act 2000* (WM Act) is the sustainable and integrated management of the state's water for the benefit of both present and future generations.

Whilst the subject site contains a classified first order creek, a desktop assessment by Eco Logical Australia (**Appendix 13**) has found that the creek line does not meet the WM Act classification. As such, the proposed development is not within 40m of what is classified as a 'river', therefore a controlled activity approval on waterfront land is not required.

### 1.2.5 BIODIVERSITY CONSERVATION ACT 2016

The *Biodiversity Conservation Act 2016* (BC Act) commenced on 25 August 2017 and sets out, among other things, to establish a scientific method for assessing the likely impacts on biodiversity values of proposed development and land use change.

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Ecological survey and assessment have been undertaken in accordance with relevant legislation including the EP&A Act and the BC Act.

In respect of matters required to be considered under the EP&A Act and relating to the species / provisions of the BC Act, three (3) threatened fauna species including the Powerful Owl (*Ninox strenua*), Grey-headed Flying-fox (*Pteropus poliocephalus*) and Little Bentwing-bat (*Miniopterus australis*), two (2) threatened flora species *Eucalyptus scoparia* and *Syzygium paniculatum* (all planted), and no threatened ecological communities (TECs) were recorded within the study area.

The assessment of significance test in accordance with Section 7.3 of the BC Act concluded that the proposed development is not likely to have a significant effect on any threatened species, endangered communities, or their habitat. Therefore a species impact statement is not required for the proposed activity.

Further details can be found within the Biodiversity Development Assessment Report, prepared by Travers Bushfire & Ecology (**Appendix 14**), and the Biodiversity Constraints Assessment, prepared by Ego Logical (**Appendix 13**).

### 1.3 STATE PLANNING POLICIES

#### 1.3.1 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

Among other functions, *State Environmental Planning Policy (Infrastructure) 2007* (SEPP Infrastructure) repeals the former *State Environmental Planning Policy No. 11 – Traffic Generating Development* and provides for certain proposals, known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (RMS) (formally the Roads and Traffic Authority) for concurrence.

Under Clause 104 of SEPP Infrastructure, referral may be required for Traffic Generating Development. Schedule 3 lists the types of development that are defined as 'Traffic Generating Development'.

Pursuant to Schedule 3 of SEPP Infrastructure, the proposed development is considered Traffic Generating Development and will require referral to NSW RMS for concurrence assessment.

#### 1.3.2 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND

Clause 7(1) of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55) requires that a consent authority must not grant development consent on land unless:

- a) *it has considered whether the land is contaminated, and*
- b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

The subject site is understood to contain three (3) contaminated areas:

1. Part A – Unregulated Area – asbestos impacted fill material;
2. Part B – Regulated Area – TCE and benzene present in groundwater both on and off-site;
  - these impacts are regulated by the NSW Environment Protection Authority (EPA), via a Voluntary Management Proposal (VMP) under the provisions of the *Contaminated Land Management Act 1997* (CLM Act);
3. Part B – Unregulated Area – petroleum hydrocarbon plume from former underground storage tanks, removed in 1997.

Remediation of these areas falls under Category 2 of the SEPP 55, as 'remediation works not needing consent'; this pathway was confirmed between Roche and Council in 2016.

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

It is understood that Roche, in conjunction with ERM, are in the process of undertaking the necessary remediation works. Roche have advised that the Site Audit Statement and close out for the regulated portion of the site is projected for 2027, whilst the unregulated portion of the site is due in 2021. These projections assume that the current ISCO (In situ chemical oxidation) technology continues to be effective, and we have also just commenced a pilot trial of SVE (Soil vapour extraction) technology which may be an effective technology if groundwater levels remain at a relatively low level.

### 1.4 REGIONAL AND LOCAL PLANNING PROVISIONS

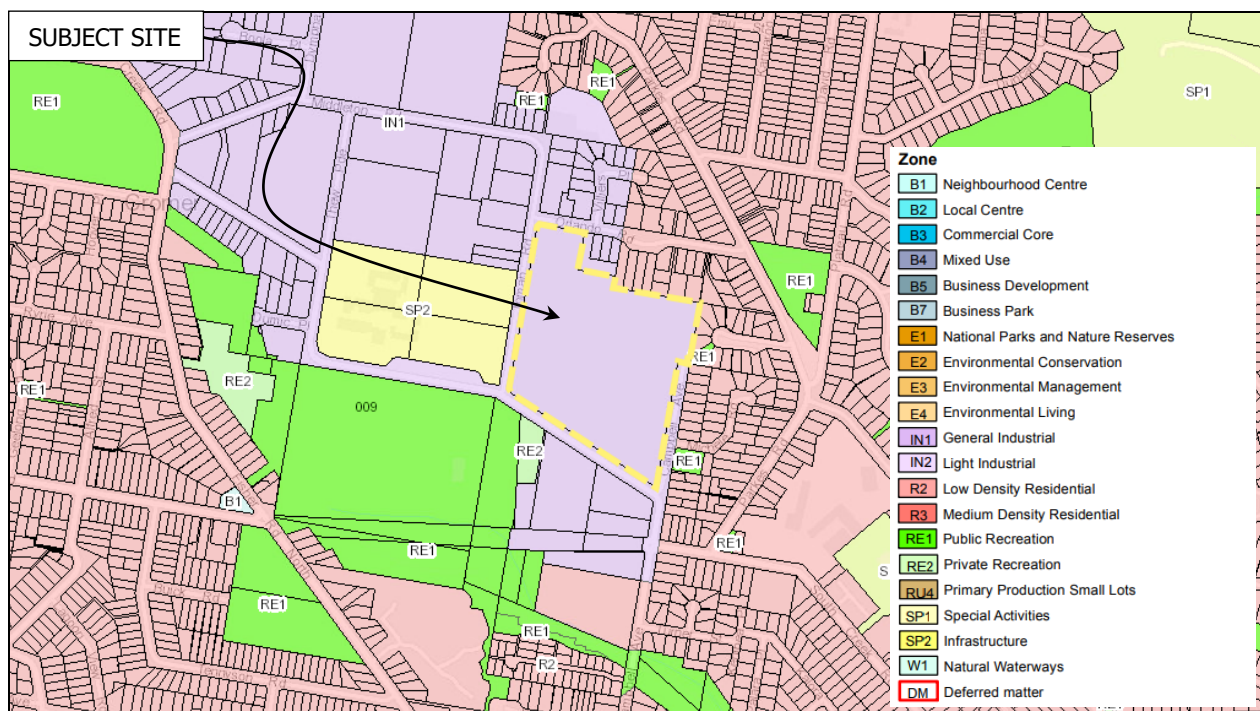
#### 1.4.1 WARRINGAH LOCAL ENVIRONMENTAL PLAN 2011

The *Warringah Local Environmental Plan 2011* (WLEP2011) is the primary environmental planning instrument that applies to the subject site.

The relevant provisions of WLEP2011 as they relate to the subject site are considered below:

##### 1.4.1.1 Zoning and permissibility

The subject site is zoned IN1 General industrial, pursuant to the WLEP2011 (refer to **Figure 9** below).



**Figure 9** WLEP2011 Zoning Map (Source: NSW Legislation, 2019)

Objectives of IN1 General industrial zone:

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.
- To enable a range of compatible community and leisure uses.
- To maintain the industrial character of the land in landscaped settings.

#### Proposed development

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

The proposal is consistent with the objectives of the IN1 zone as it:

- Supports the sympathetic reuse of the subject site, including maintenance of the industrial character of the land in its existing landscaped setting;
- Promotes an economically sustainable development, and reinforcing the status of an employment-generating development that positively contributes to the Northern Beaches area;
- Encourages assurance for the coordinated planning and development of land;
- Ensures minimal environmental and amenity impacts; and
- Ensures development is compatible with surrounding development and the local context.

The proposed development involves the following land uses, which are considered 'permissible with consent' in the IN1 zone.

**Warehouse or distribution centre** means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made.

**Storage premises** means a building or place used for the storage of goods, materials, plant or machinery for commercial purposes and where the storage is not ancillary to any industry, business premises or retail premises on the same parcel of land, and includes self-storage units, but does not include a heavy industrial storage establishment or a warehouse or distribution centre.

The proposed development involves the following land uses, which are 'prohibited' in the IN1 zone.

**Office premises** means a building or place used for the purpose of administrative, clerical, technical, professional or similar activities that do not include dealing with members of the public at the building or place on a direct and regular basis, except where such dealing is a minor activity (by appointment) that is ancillary to the main purpose for which the building or place is used.

**Restaurant or cafe** means a building or place the principal purpose of which is the preparation and serving, on a retail basis, of food and drink to people for consumption on the premises, whether or not liquor, take away meals and drinks or entertainment are also provided.

The abovementioned prohibited land uses are proposed to allow for the sympathetic adaptive reuse of the retained cottage and former Roche office buildings. In order to overcome the listed prohibition, enactment of Clause 5.10(10) of the WLEP2011 is sought.

The preservation of heritage items and the historic character of the subject site is pivotal to the success of the proposed development. Whilst not entirely consistent with the intent of the IN1 General industrial zone, the café and office premises are proposed to afford sympathetic reuse of existing character buildings, which are not considered suitable for industrial-type uses.

There exists linked demand for commercial (office) usage within the area. Whilst their use for ancillary office will be pursued, the proponent will investigate other suitable adaptive reuse options, including low-key creative industries and local business 'start up' incubator opportunities.

Further details are included in **Section 4.4.1.2** below.

### 1.4.1.2 Development standards

**Table 7** outlines the developments consistency and compliance with the relevant development standards and controls under WLEP2011.

Table 7 Development Standards – WLEP2011	
Clause	Comment

**Statement of Environmental Effects**

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

<b>Table 7 Development Standards – WLEP2011</b>	
<b>Clause</b>	<b>Comment</b>
<b>Principle Development Standards</b>	
Clause 4.1 – Minimum Lot Size	The subject site is not restricted to a minimum lot size.
Clause 4.1AA – Minimum subdivision lot size for community title schemes	Clause 4.1AA is not relevant to this proposal.
Clause 4.2 – Rural subdivision	Clause 4.2 is not relevant to this proposal.
Clause 4.2A – Minimum subdivision lot size for strata subdivision of residential or tourist and visitor accommodation in certain zones	Clause 4.2A is not relevant to this proposal.
Clause 4.3 – Height of Buildings	<p>Clause 4.3 of the WLEP2011 limits building height to 11m at the subject building.</p> <p>The proposed development seeks a maximum building height of 13.83m. As such, a contravention in accordance with Clause 4.6 is sought.</p>
Clause 4.4 – Floor Space Ratio	Clause 4.4 is not relevant to this proposal.
Clause 4.5 – Calculation of floor space ratio and site area	Clause 4.5 is not relevant to this proposal.
Clause 4.6 – Exceptions to development standards	<p>This proposal seeks to contravene Clause 4.3.</p> <p>Further details are included in the Clause 4.6 Variation Request, which has been prepared as part of this development application.</p>
<b>Miscellaneous Provisions</b>	
Clause 5.9 – Preservation of trees or vegetation	The proposal would involve clearing of up to 0.02ha disturbed non-TEC vegetation.
Clause 5.10 – Heritage conservation	<p>The subject site contains three items of heritage, listed under the WLEP2011.</p> <p>Pursuant to Clause 5.10, the following subclauses have been addressed:</p> <p>(4) Heritage 21 have been engaged to provide specialist advice relating to the subject site and its items of heritage, having prepared the following documentation:</p> <ul style="list-style-type: none"> <li>▪ Statement of Heritage Impact – in accordance with subclause (5)</li> <li>▪ Conservation Management Plan – in accordance with subclause (6)</li> </ul> <p>To ensure these heritage items and character of the subject site are protected, enactment of Clause 5.10(10) is sought – refer below.</p>
<b>Additional Local Provisions</b>	
Clause 6.2 – Earthworks	<p>The proposal includes earthworks, that are ancillary to the proposed development, pursuant to Clause 6.2(1)(b) and (2)(b).</p> <p>Costin Roe have prepared a Civil Engineering Report and Drawings (<b>Appendix 8</b>), to ensure that the earthworks will not have detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land, in accordance with Clause 6.2(1)(a).</p>



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 7 Development Standards – WLEP2011	
Clause	Comment
Clause 6.4 – Development on sloping land	<p>The subject site is identified as containing the following areas, as per the WLEP2011 Landslip Risk Map:</p> <ul style="list-style-type: none"><li>Area A – Slope less than 5 degrees (most of the subject site);</li><li>Area D – Collaroy Plateau Area Flanking Slopes 5 to 15 degrees (northern portion of the subject site); and</li><li>Area E – Collaroy Plateau Area Slopes more than 15 degrees (small area in north-eastern corner of the subject site).</li></ul> <p>A Preliminary Geotechnical Assessment, prepared by JK Geotechnics (<b>Appendix 15</b>), Desktop Groundwater Assessment, prepared by Douglas Partners (<b>Appendix 16</b>), and Civil Engineering Report, prepared by Costin Roe (<b>Appendix 8</b>), have been prepared for consideration.</p>

Further details of relevant provisions are included in the following sub-sections.

### Clause 4.3 – Height of Buildings

The objectives of Clause 4.3 are:

- (a) *to ensure that buildings are compatible with the height and scale of surrounding and nearby development,*
- (b) *to minimise visual impact, disruption of views, loss of privacy and loss of solar access,*
- (c) *to minimise any adverse impact of development on the scenic quality of Warringah's coastal and bush environments,*
- (d) *to manage the visual impact of development when viewed from public places such as parks and reserves, roads and community facilities.*

Through the detailed design process, the breach of the building height control has been reduced to just 2.83m above the prescribed 11m limit. However, this remains below the general height of the existing buildings (proposed to be demolished).

**Table 8** provides an assessment against each relevant subclauses of Clause 4.3.

Table 8 Height of Buildings Assessment	
Clause 4.3 item	Comment
(a) <i>ensure that buildings are compatible with the height and scale of surrounding and nearby development</i>	<p>The intent of the proposed development is to allow for the sympathetic adaptive reuse of the former Roche premises, while contributing to the existing industrial character experienced within the IN1 General Industrial zone and within the immediate vicinity of the subject site, consistent with the WLEP2011 and WDCP2011.</p> <p>The design approach for the subject site has evolved following market feedback and considerable consultation with Council. The proposed development would involve the construction of multi-unit warehouse, including ancillary works, and the adaptive re-use of the former Roche office building and heritage cottage.</p> <p>By setting the proposed warehouses back from the retained former Roche office buildings, the warehouses successfully recede into perspective, with the main focus being the office buildings and established landscaping.</p> <p>The proposed warehouses set behind the retained Roche office</p>

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 8 Height of Buildings Assessment	
Clause 4.3 item	Comment
	<p>buildings is set back further and is lower than the existing building 07 in this location. It is also lower than the existing building 03 immediately to the east, which will be demolished and replaced by the 22m wide open space for vehicular access, thus enhancing the setting of the retained single storey building.</p> <p>It is important to note, that the predominant building setbacks would be maintained accordingly, with regard to the setback controls articulated within the WDCP2011 for industrial development. The additional height would only read as approximately 2.83 m above the permitted maximum height control for the subject site; which is below the existing building height.</p> <p>With its overall site configuration, a well resolved built-form and potential public realm benefits, the proposed development can create a high quality built-form, which is sympathetic to the existing heritage, as well as being a quality contribution to the urban built-form of the surrounding area, comprising a versatile mix of transitional industrial (north, south and west) and low density residential (north-east) development surrounding the subject site. Through the maintenance of established landscaping, historic buildings and peripheral amenities to preserve the streetscape, the proposed development can achieve a suitable fit within the existing public realm, with positive economic, social and environmental benefits for the wider community.</p> <p>In order to facilitate high quality resolution of the building envelope, and to enable the best outcome for transitional relationships with the adjoining sites, the proposed development comprises a legible and efficient floor plan with the façade articulation, as well as material and colour selection to complement the existing heritage items an aesthetic.</p> <p>Underpinned by the subtly expressive architectural language, the building articulation of the industrial development transitions well both horizontally and vertically in its streetscape and existing heritage setting.</p> <p>Additionally, the built-form of the proposed development responds to the operational requirements of the end-user and any future users of the subject site. Accordingly, the height of the proposed development is considered highly appropriate for the subject site and its context. Notwithstanding, the height is representative of market needs and demands for modernised industrial warehouse and industrial facilities, for which the average industry standard (based on Fire Engineering and BCA requirements).</p>
(b) <i>minimise visual impact, disruption of views, loss of privacy and loss of solar access</i>	<p>It is important to note, that the most significant breach in height, is towards South Creek Road (southern interfaces), which results from the falling topography towards the south.</p> <p>The proposed warehouse building at the south west corner of the subject site will be lower in scale than the existing building and has been designed to complement the retained former Roche office building. The horizontally banded arrangement of the façade is more in harmony with the architectural expression of the former Roche office building than the building that it will replace.</p>



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 8 Height of Buildings Assessment	
Clause 4.3 item	Comment
	<p>Existing canopy trees at the street corner will be retained and augmented by new planting.</p> <p>Accordingly, careful selection of building finishes and colours, combined with proposed landscape planting, particularly along the southern and western boundaries (South Creek Road and Inman Road frontages) of the subject site, is considered to be appropriately treated from an architectural perspective, as well as being aesthetically pleasing to mitigate any visual impacts. This will assist in screening the built-form of the proposed development within the locality.</p> <p>The 3D images, prepared as part of this proposal, clearly demonstrate that the proposed warehouse units retain a significant portion of the former office building, maintaining the heritage values of the site. The southern part of the proposed building is located where the land slopes down significantly, presenting to the intersection of Inman Road and South Creek Road and to South Creek Road.</p> <p>It is noted that the Northern Beaches Secondary College Cromer Campus, to the west, is not impacted by the proposed development as it presents only playing fields and the carpark of the Manly Warringah Football Club in its interface with the subject site. Given the location of the development in context of the existing site, it is considered that there is no residential interface with the proposed works. In these circumstances compliance with the height control would not achieve a better urban design outcome and would be unreasonable and unnecessary.</p> <p>Further, the proposed building height exceedance, is limited to the southern portion of the subject site, which is located well away from the northern R2 Low density residential zone. It is therefore considered that the proposed contravention would have no impact on nearby residential housing.</p> <p>Notwithstanding, the proposed development has incorporated an aesthetically pleasing architectural and landscaped design. Furthermore, whilst the proposed development has considered nearby sensitive land users, the subject site is zoned for such industrial-related uses, which the proposed development responds to, by according with the objectives of the IN1 General Industrial zone.</p> <p>The architectural and landscape plans for the proposed development are included in <b>Appendix 6</b> and <b>Appendix 7</b>, demonstrating that there would be no such significant visual impacts on adjoining sites and sensitive receivers.</p>
(c) <i>minimise any adverse impact of development on the scenic quality of Warringah's coastal and bush environments</i>	<p>The proposed development is located within an established industrial area and suitably zoned IN1 General industrial. The proposed warehouse units are sought to replace existing buildings at the subject site, which would limit the extent of the vegetation clearing necessary to carry out the resultant works.</p> <p>Further, it is noted that the subject site does contain significant bushland environments (eastern portion of the site), which are intended to be retained as part of this proposal. The proposal also seeks to maintain mature landscaping along the Inman Road and</p>

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 8 Height of Buildings Assessment	
Clause 4.3 item	Comment
	South Creek Road frontages.
(d) <i>manage the visual impact of development when viewed from public places such as parks and reserves, roads and community facilities</i>	<p>The principle views, from the public domain, towards the subject site are at street level (from Inman Road and South Creek Road), which are predominantly screened by mature plantings.</p> <p>The proposed development has undergone a significant design process to ensure that the curtilage is retained, including the retention of soft landscaping and the introduction of additional soft landscaping. The proposed retention of the former Roche Office buildings seeks to maintain the Inman Road interface.</p> <p>It is noted that the Northern Beaches Secondary College Cromer Campus, to the west, is not impacted by the proposed development as it presents only playing fields and the carpark of the Manly Warringah Football Club in its interface with the subject site. Given the location of the development in context of the existing site, it is considered that there is no residential interface with the proposed works. In these circumstances compliance with the height control would not achieve a better urban design outcome and would be unreasonable and unnecessary.</p> <p>The proposed warehouse building at the south west corner of the subject site will be lower in scale than the existing building and has been designed to complement the retained former Roche office building. The horizontally banded arrangement of the façade is more in harmony with the architectural expression of the former Roche office building than the building that it will replace. Existing canopy trees at the street corner will be retained and augmented by new planting.</p> <p>Accordingly, careful selection of building finishes and colours, combined with proposed landscape planting, particularly along the southern and western boundaries (South Creek Road and Inman Road frontages) of the subject site, is considered to be appropriately treated from an architectural perspective, as well as being aesthetically pleasing to mitigate any visual impacts. This will assist in screening the built-form of the proposed development within the locality.</p>

### Clause 5.10 – Heritage conservation

The preservation of heritage items and the historic character of the subject site is pivotal to the success of the proposed development. Whilst not entirely consistent with the intent of the IN1 General industrial zone, the café and office premises are proposed to afford sympathetic reuse of existing character buildings, which are not considered suitable for industrial-type uses.

The café and office premises are proposed as follows:

- The café is proposed to allow the adaptive re-use of the existing cottage at Inman Road; and
- The potential office use of the former Roche administration buildings.

In order to satisfy the provisions of the WLEP2011 and overcome the prohibition of the proposed café and office premises, enactment of Clause 5.10(10) is sought.

Pursuant to Clause 5.10(10) the *consent authority may grant consent to development for any purpose of a building that is a heritage item or of the land on which such a building is erected, or for any purpose on*

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

*an Aboriginal place of heritage significance, even though development for that purpose would otherwise not be allowed by this Plan, if the consent authority is satisfied that:*

- (a) the conservation of the heritage item or Aboriginal place of heritage significance is facilitated by the granting of consent, and*
- (b) the proposed development is in accordance with a heritage management document that has been approved by the consent authority, and*
- (c) the consent to the proposed development would require that all necessary conservation work identified in the heritage management document is carried out, and*
- (d) the proposed development would not adversely affect the heritage significance of the heritage item, including its setting, or the heritage significance of the Aboriginal place of heritage significance, and*
- (e) the proposed development would not have any significant adverse effect on the amenity of the surrounding area.*

**Table 9** provides an assessment against each Clause 5.10(10) item.

<b>Table 9 Heritage Conservation Assessment</b>	
<b>Clause 5.10(10) item</b>	<b>Comment</b>
<i>(a) the conservation of the heritage item or Aboriginal place of heritage significance is facilitated by the granting of consent</i>	The existing cottage at Inman Road and the former Roche office building would not be suitable for industrial type uses and would necessitate significant alterations in order to meet industry requirements. These works would be detrimental to the identified significance of the retained buildings.  By ensuring the continued use for office purposes and the café use for the cottage, the ongoing maintenance and conservations of these buildings is assured.
<i>(b) the proposed development is in accordance with a heritage management document that has been approved by the consent authority</i>	As documented in the Statement of Heritage Intent, Heritage 21 is <i>confident that the proposed development complies with pertinent heritage controls and would have minimal impact on the heritage significance of the subject site.</i>  A Conservation Management Plan has been prepared by Heritage 21 and lodged as part of this application.
<i>(c) the consent to the proposed development would require that all necessary conservation work identified in the heritage management document is carried out</i>	Understood and noted; the proposed development would be carried out in accordance with the supporting Conservation Management Plan and Statement of Heritage Intent, prepared by Heritage 21.
<i>(d) the proposed development would not adversely affect the heritage significance of the heritage item, including its setting, or the heritage significance of the Aboriginal place of heritage significance</i>	As documented in the Statement of Heritage Intent, Heritage 21 is <i>confident that the proposed development complies with pertinent heritage controls and would have minimal impact on the heritage significance of the subject site.</i>
<i>(e) the proposed development would not have any significant adverse effect on the amenity of the surrounding area</i>	Through the retention and adaptive reuse of the existing cottage at Inman Road and the former Roche administration building, the impacts upon amenity of the surrounding area would be substantially minimised.  The proposed development has undergone a significant design process to ensure the retention of highly significant elements of the heritage item.  The proposal includes the change of use of the existing cottage as

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

Table 9 Heritage Conservation Assessment	
Clause 5.10(10) item	Comment
	a commercial café and for Roche administration building as possible commercial offices. The proposal seeks to maintain the external façade and building fabrics and associated landscaping of these areas, ensuring that their amenity is also maintained.

### 1.5 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No Draft Environmental Planning Instruments apply to the subject site.

### 1.6 NON-STATUTORY PLANNING FRAMEWORK OVERVIEW

The following non-statutory development control and strategic plans apply to the subject site and proposed development.

- *Warringah Development Control Plan 2011* (WDCP2011)

#### 1.6.1 WARRINGAH DEVELOPMENT CONTROL PLAN 2011

The WDCP2011 supplements the WLEP2011 and provides more detailed provisions to guide development.

The overriding objective of the WDCP2011 is to:

*create and maintain a high level of environmental quality throughout Warringah. Development should result in an increased level of local amenity and environmental sustainability.*

The other objectives of the WDCP2011 are:

- (a) *To ensure development responds to the characteristics of the site and the qualities of the surrounding neighbourhood*
- (b) *To ensure new development is a good neighbour, creates a unified landscape, contributes to the street, reinforces the importance of pedestrian areas and creates an attractive design outcome*
- (c) *To inspire design innovation for residential, commercial and industrial development*
- (d) *To provide a high level of access to and within development.*
- (e) *To protect environmentally sensitive areas from overdevelopment or visually intrusive development so that scenic qualities, as well as the biological and ecological values of those areas, are maintained*
- (f) *To achieve environmentally, economically and socially sustainable development for the community of Warringah*

The proposed development is compatible with the former use of the subject site and has been designed to accord with the objectives of the WDCP2011.

A thorough assessment of the proposed development against the relevant provisions of the WDCP2011 accompanies this application, included at **Appendix 4**.

## **PART E      LIKELY IMPACTS OF THE DEVELOPMENT**

This section identifies and assesses the impacts of the development with specific reference to the heads of consideration under Section 4.15(1) of the EP&A Act.

### **5.1      CONTEXT AND SETTING**

The subject site comprises one large allotment, including laboratory, factory, warehouse buildings, administrative offices and stores, previously occupied by Roche. The buildings are predominantly located in the south western portion of the subject site and are accessible via Inman Drive and South Creek Road. The eastern side of the subject site slopes down to a gully densely covered in well-established forest. A small portion to the north of the subject site, extending to Orlando Road, comprises a grassed area with scattered trees at a higher level.

This proposal represents the following changes to the subject site:

- Retention of the heritage significant Roche office building fronting Inman Road together with the single storey wing from its north-west corner;
- Retention of the grassed area and trees along in front of the entrance and the single storey wing;
- Retention of the existing cottage fronting Inman Road;
- Retention of the hexagonal tower at the centre of the site;
- Retention and enhancement of the existing established trees and landscaping on the Inman Road and south Creek Road frontages;
- Demolition of the rest of the (non-heritage) buildings on the site;
- Site excavation mainly in the south west part of the site;
- Construction of eleven (11) warehouse units: behind the retained office building, to the south of the retained office building in the same position of the large former Roche building; along the northern edge of the site; and along the eastern edge clear of the existing gully and forest area;
- A vehicle court separating the running between the warehouse units;
- At the lower southern end of the site basement level buildings, carparking and an area of self-storage units;
- Vehicular access to the warehouses via Inman Road at the existing entry point and egress to South Creek Road at the south-east corner of the site;
- Vehicular access to the carparking level off Inman Road at an existing entry/exit point;
- Vehicular access to the self-storage units off South Creek Road.

The amended proposal has been significantly changed through a process of consultation with Northern Beaches Council and internal critiques by the consultant team. The proposal would now achieve a quality balance between retention of the key heritage values of the subject site and the sought development for warehouse facilities in an enhanced landscape setting.

Overall, the proposed development supports the continued use of the subject site and preserves its amenity as well as the amenity of all surrounding properties. The proposed development would not exhibit any significant environmental impacts and would not adversely impact the amenity of any adjoining properties. No activities which exist near the subject site would prevent the development from being undertaken or successfully operating long term. Therefore, the proposed development is considered compatible with the site context.

### **5.2      BUILT FORM**

The design approach for the subject site has evolved following market feedback and considerable consultation with Council. The proposed development would involve the construction of multi-unit warehouse, including ancillary works, and the adaptive re-use of the former Roche office building and heritage cottage. The proposed built form has been informed through extensive specialist input, in conjunction with EG, from the following areas:

- Council officers – all areas of expertise



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

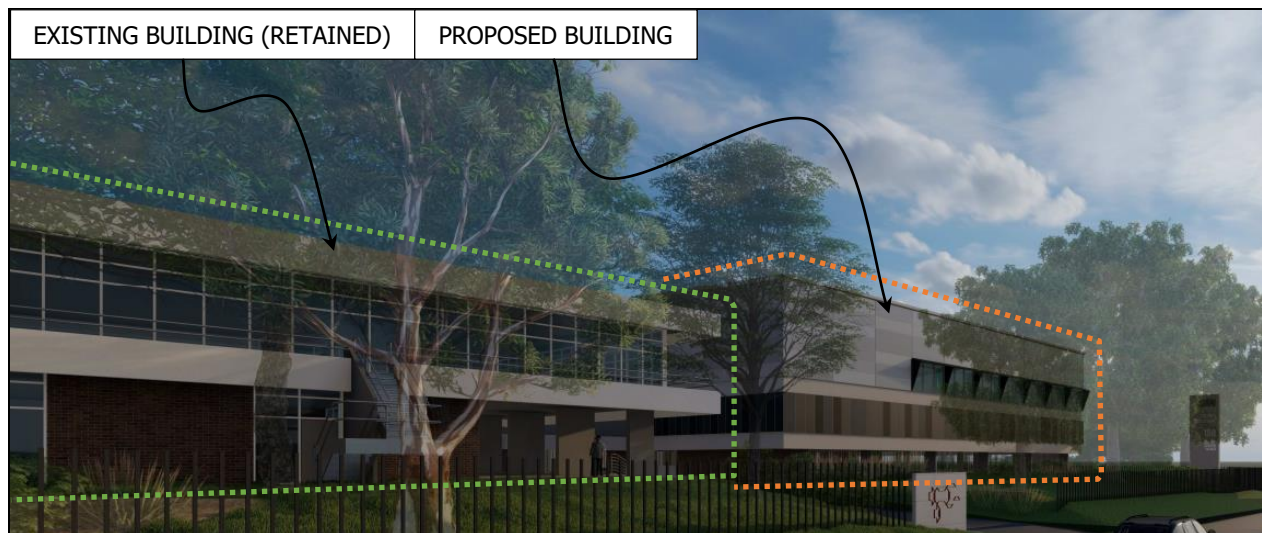
- Heritage 21 – heritage matters
- DFP Planning – urban design matters
- Site Image Landscape Consultants – landscaping matters
- SBA Architects – architectural design

The resulting proposal would achieve a quality built-form outcome for the subject site, that is sympathetic to its existing character and historic operations.

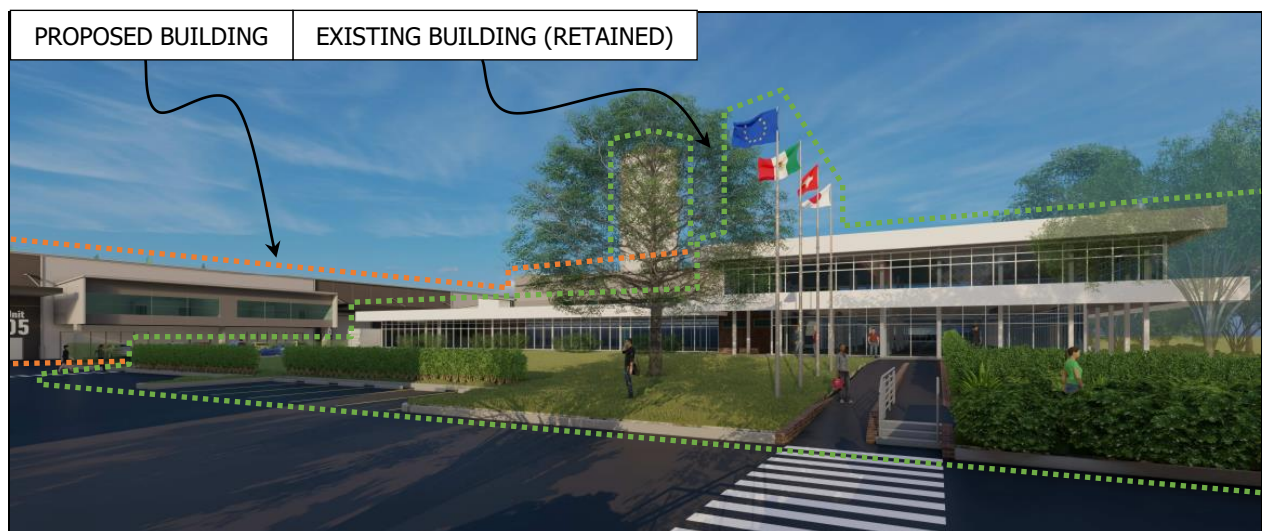
### 5.2.1 HERITAGE CONSIDERATIONS

Heritage and urban design considerations are intertwined in this application due to the nature of the existing buildings and the site context.

The development has retained the heritage significant former office building fronting Inman Road, the single storey office building returning at right angles at its northern end and the hexagonal tower element. The design of the new buildings has been substantially improved to harmonise with the retained heritage buildings as shown in **Figure 10** and **Figure 11**. The facades now have a horizontal emphasis picking up the colouring the retained building facades facing Inman Road and areas of glazing and ventilation louvres.



**Figure 10** Proposed property view from Inman Road looking towards South Creek Road  
(Source: SBA Architects, 2019)



**Figure 11** Proposed property view looking towards the former Roche office building  
(Source: SBA Architects, 2019)

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

An earlier iteration of the amended proposal was reviewed by the Council's heritage adviser, Robert Moore. Elements of the amended proposal receiving favourable comment are:

- Retention of the single storey office wing;
- Treatment of the new corner building with the suggestion that colour and surface finish should be made a bit more recessive compared to the office building by adopting "off white" or similar colour;
- The open space in front of the single storey office wing;
- Recognising the setback of the warehouse units behind the retained buildings with a suggestion for a dark band of glazing in a band along the upper wall area;
- Retention of the hexagonal tower noting that fabric retention and structural support needs to be resolved; and retention of the cottage.

These comments have been incorporated in the refinement of the proposed design as now presented.

### 5.2.2 BULK AND SCALE

The intent of the proposed development is to allow for the effective reuse of the former Roche premises, while contributing to the existing industrial character experienced within the IN1 General industrial zone and within the immediate vicinity of the subject site, consistent with the WLEP2011 and WDCP2011.

The design approach for the subject site has evolved following market feedback and considerable consultation with Council. The proposed development would involve the construction of multi-unit warehouse, including ancillary works, and the adaptive re-use of the former Roche office building and heritage cottage.

By setting the proposed warehouses back from the retained former Roche office buildings, the warehouses successfully recede into perspective, with the focus being the office buildings and established landscaping.

The proposed warehouses set behind the retained Roche office buildings is set back further and is lower than the existing Building 07 in this location. It is also lower than the existing Building 03 immediately to the east, which will be demolished and replaced by the 22m wide open space for vehicular access, thus enhancing the setting of the retained single storey building.

It is important to note, that the predominant building setbacks would be maintained accordingly, regarding the setback controls articulated within the WDCP2011 for industrial development. The additional height would only read as approximately 2.83m above the permitted maximum height control for the subject site; which is below the existing building height.

With its overall site configuration, a well resolved built-form and potential public realm benefits, the proposed development can create a high quality built-form, which is sympathetic to the existing heritage, as well as being a quality contribution to the urban built-form of the surrounding area, comprising a versatile mix of transitional industrial (north, south and west) and low density residential (north-east) development surrounding the subject site. Through the maintenance of established landscaping, historic buildings and peripheral amenities to preserve the streetscape, the proposed development can achieve a suitable fit within the existing public realm, with positive economic, social and environmental benefits for the wider community.

In order to facilitate high quality resolution of the building envelope, and to enable the best outcome for transitional relationships with the adjoining sites, the proposed development comprises a legible and efficient floor plan with the façade articulation, as well as material and colour selection to complement the existing heritage items an aesthetic.

Underpinned by the subtly expressive architectural language, the building articulation of the industrial development transitions well both horizontally and vertically in its streetscape and existing heritage setting.



Additionally, the built form of the proposed development responds to the operational requirements of the end-user and any future users of the subject site. Accordingly, the height of the proposed development is considered highly appropriate for the subject site and its context. Notwithstanding, the height is representative of market needs and demands for modernised industrial warehouse and industrial facilities, for which the average industry standard (based on Fire Engineering and BCA requirements).

### 5.3 TRAFFIC & TRANSPORT

A Transport Impact Assessment has been prepared by GTA Consultants (**Appendix 11**), to inform the proposed development. The following items are included to summarise the findings of the Transport Impact Assessment.

#### 5.3.1 TRAFFIC GENERATION

Whilst the previous use had similar overall GFA to the proposal, there was a higher proportion of office space. As a result, the proposal is expected to generate approximately 130 vehicles less during the peak hours, or at least 40 per cent less traffic compared with previous site operations.

Notwithstanding, the impact of the proposal on the surrounding road network has been reviewed. GTA indicate that the anticipated traffic volumes associated with the proposal could not be expected to compromise the safety or function of the surrounding road network.

#### 5.3.2 PARKING

##### 5.3.2.1 Bicycle parking

Based on the requirements of the WDCP2011, a total of 39 bicycle spaces are required to service the proposed development. While bicycle parking is not currently shown on the proposed development plans, the required bicycle parking can be suitably accommodated at the subject site.

##### 5.3.2.2 Car parking

In establishing the appropriate parking supply for the proposal, reference is made to both the WDCP2011 and the *Roads and Maritime Services Guide to Traffic Generating Developments 2002* (RMS Guide).

#### WDCP2011 – car parking requirements

The WDCP2011 parking rates for warehouse and industry uses allows for up to 20 per cent office floor area within individual tenancies. A review of the area schedule suggests that the mezzanine office space for the 11 units will account for less than 15 per cent of the floor area, therefore no separate consideration of office floor area is required. There are no specific rates for self-storage facilities, as such the warehouse rates have been applied.

The WDCP2011 car parking requirement for the proposed development is 371 spaces, of which 8 are to be accessible spaces.

#### RMS – car parking requirements

The RMS Guide provides separate rates for factory and warehouse uses under the grouping of industry. The 20 per cent office floor area allowance also applies to the factory rate, however the warehouse rate does not specifically include this allowance and GTA typically considers ancillary office space separately for warehouses. There are no specific rates for self-storage facilities, as such the warehouse rates have been applied. The on-site café is ancillary to the overall development and surrounding area and is not expected to be a destination in its own right. As such, any parking demand for the café (i.e. visitors not associated with other tenancies or immediate local area) would be minimal.

If the proposed warehouse component were considered all warehouse, the resulting RMS car parking requirement would be 190 spaces.

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

If the proposed warehouse component were considered all factory/light industrial, the resulting RMS car parking requirement would be 318 spaces.

### Parking demand

There are no confirmed tenants for the individual units, however EG has advised that it is likely to include both warehouse and light industrial (e.g. medical equipment assembly) tenants. While the balance will vary over the life of the facility, it is unlikely that parking requirements will be skewed to either end of the range at a given point in time.

GTA recommend that rates adopted in RMS Guide for factory and warehouse uses better reflect the intended site occupancy/operation compared with the single rate adopted in the WDCP2011. For the purposes of this assessment, a likely split of 70 per cent warehouse tenants to 30 per cent light industrial tenants has been assumed for the units based on advice from EG that it will be more skewed towards warehouse.

Self-storage facilities typically require less staff than traditional warehouse facilities, whilst users have access to the facility 24 hour/seven days a week. These facilities do not have defined peak parking demand, with user arrivals dispersed across the day. In addition, such facilities are not a high traffic and parking generator as users typically leave their goods stored for extended periods of time without accessing. All of the above suggests that a more suitable car parking provision would be aligned with the RMS Guide rate for warehouse uses.

GTA's summary of the anticipated car parking demand is provided in **Table 10** and suggests that the proposal could generate a demand for 228 spaces.

<b>Table 10 Anticipated Parking Demand</b>			
<b>Land use</b>	<b>Parking rate</b>	<b>Parking requirement</b>	<b>Proposed provision</b>
Self-storage	1 space per 300m <sup>2</sup> (RMS warehouse rate)	13 spaces	<b>231 spaces</b>
Warehouse (70% of units)	Warehouse – 1 space per 300m <sup>2</sup> (RMS rate) Office (ancillary) – 1 space per 40m <sup>2</sup>	36 spaces 32 spaces	
Industry (30% of units)	1.3 spaces per 100m <sup>2</sup> (inc. ancillary office)	68 spaces	
Office premises	1 space per 40m <sup>2</sup>	79 spaces	
Café	Ancillary to overall development (infrequent external trips expected)	0 spaces	
<b>Total</b>		<b>228 spaces</b>	

The expected parking demand generated by the proposal (228 spaces) is generally in accordance with the proposed provision (231 spaces). It is noted that the balance of warehouse and light industrial/factory uses will influence the demand, which could range between 205 spaces and 333 spaces when considering the relevant rates in the RMS Guide. However, GTA have advised it is unlikely that parking requirements will be skewed to either end of the range at a given point in time.

As previously mentioned, the café is expected to be ancillary to the site and surrounding area (i.e. school, sports fields and other industrial uses), with a predominant walk-up catchment. As such, it is not expected to be an exclusively vehicle trip destination.

The commercial office use of the retained Roche administration building is a possible outcome. However the proponent is investigating other sympathetic adaptive uses, but which should not generate any additional onsite parking demand, than the identified commercial rate (1 space per 40m<sup>2</sup>).

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

The subject site also has some 400m of street frontages along South Creek Road and Inman Road. Discounting locations of proposed vehicle accesses, there is opportunity to park up to 40 vehicles directly adjacent to these frontages.

It is generally considered acceptable for a development to rely on 50 to 60 per cent of the available site frontage(s) to accommodate parking demand, which promotes on-street activation and traffic calming.

Given the above, it is considered that the proposed development is suitably designed to cater for car parking in line with expected demand.

### 5.3.3 ACCESS AND LOADING

The GTA review indicates that the proposed site layout is expected to operate satisfactorily, subject to the adoption of recommendations included in their Transport Impact Assessment.

The proposed car parking spaces will be designed as a User Class 2 facility with each space to be a minimum 2.5m wide and 5.4m long, with adjacent 5.8m wide aisles. Car parking spaces for people with disabilities will be designed as a User Class 4 facility with each a minimum 2.4m wide and 5.4m long, with a shared area 2.4m wide and 5.4m long on one side of the dedicated space. A centrally located bollard will also be required in the shared area.

The site access driveways are to be designed to accommodate entry/exit movements for the largest design vehicle requiring access. Swept paths have been completed and show that vehicles up to and including Australian Standard 20-metre-long articulated vehicles can enter and exit the site in a forward direction.

There are three separate site accesses proposed along Inman Road, as follows:

- a two-way visitor car park access (new driveway)
- a two-way at-grade car and truck to the light industrial/ warehouse units (existing driveway location)
- a two-way basement car park access (existing driveway location).

A further two separate site accesses are proposed along South Creek Road, as follows:

- a two-way access to the self-storage facility (new driveway)
- an exit only access from the light industrial/ warehouse units (existing driveway location).

Based on the above, it is considered that the proposed development is suitable in terms of transport planning grounds.

## 5.4 STORMWATER & EROSION & SEDIMENT CONTROL

The engineering objectives for the development are to create a site which, based on the proposed architectural layout, responds to the topography and site constraints and to provide an appropriate and economical stormwater management system which incorporates best practice in water sensitive urban design and is consistent with the requirements of council's water quality objectives.

The property is currently developed with in-ground drainage throughout the subject site. The subject site has an existing culvert and an open channel trunk drainage system which runs along the east from the north to the south. Upstream flows discharge into the channel at the north, where flows are then conveyed along the open channel and culvert towards the downstream discharge point and under South Creek Road.

A civil engineering strategy for the site has been developed which provides a best practice solution within the constraints of the existing landform and proposed development layout. Within this strategy a stormwater quality management strategy has been developed to reduce pollutant loads in the stormwater

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

leaving this site. The stormwater management for the development has been designed in accordance with Section 8.1.1 of the Northern Beach Council's *PL 850 WATER – Water Management Policy*.

During the construction phase, a Sediment and Erosion Control Plan will be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff.

During the operational phase of the development, a bio-retention basin is proposed to mitigate any increase in stormwater pollutant load generated by the development. MUSIC modelling results indicate that the proposed STM are effective in reducing pollutant loads in stormwater discharging from the site and meet the requirements of Council's pollution reduction targets. Best management practices have been applied to the development to ensure that the quality of stormwater runoff is not detrimental to the receiving environment.

The Civil Engineering Report, prepared by Costin Roe (**Appendix 8**), provides more detail regarding stormwater and erosion and sediment controls matters.

## 5.5 CONTAMINATION

The subject site is understood to contain three (3) contaminated areas:

1. Part A – Unregulated Area – asbestos impacted fill material;
2. Part B – Regulated Area – TCE and benzene present in groundwater both on and off-site;
  - these impacts are regulated by the NSW Environment Protection Authority (EPA), via a Voluntary Management Proposal (VMP) under the provisions of the *Contaminated Land Management Act 1997* (CLM Act);
3. Part B – Unregulated Area – petroleum hydrocarbon plume from former underground storage tanks, removed in 1997.

Remediation of these areas falls under Category 2 of the SEPP 55, as 'remediation works not needing consent'; this pathway was confirmed between Roche and Council in 2016.

It is understood that Roche, in conjunction with ERM, are in the process of undertaking the necessary remediation works. Roche have advised that the Site Audit Statement and close out for the regulated portion of the site is projected for 2027, whilst the unregulated portion of the site is due in 2021. These projections assume that the current ISCO (In situ chemical oxidation) technology continues to be effective, and we have also just commenced a pilot trial of SVE (Soil vapour extraction) technology which may be an effective technology if groundwater levels remain at a relatively low level.

## 5.6 VISUAL

The principal views – from the public domain – towards the existing and proposed development are at street level from Inman Road and South Creek Road. Views are generally screen by existing mature vegetation, which are to be maintained as part of this proposal.

The principle views are predominantly screened by mature plantings.

The proposed development has undergone a significant design process to ensure that the curtilage is retained, including the retention of soft landscaping and the introduction of additional soft landscaping. The proposed retention of the former Roche Office buildings seeks to maintain the Inman Road interface.

It is noted that the Northern Beaches Secondary College Cromer Campus, to the west, is not impacted by the proposed development as it presents only playing fields and the carpark of the Manly Warringah Football Club in its interface with the subject site. Given the location of the development in context of the existing site, it is considered that there is no residential interface with the proposed works. In these circumstances compliance with the height control would not achieve a better urban design outcome and would be unreasonable and unnecessary.



## Statement of Environmental Effects

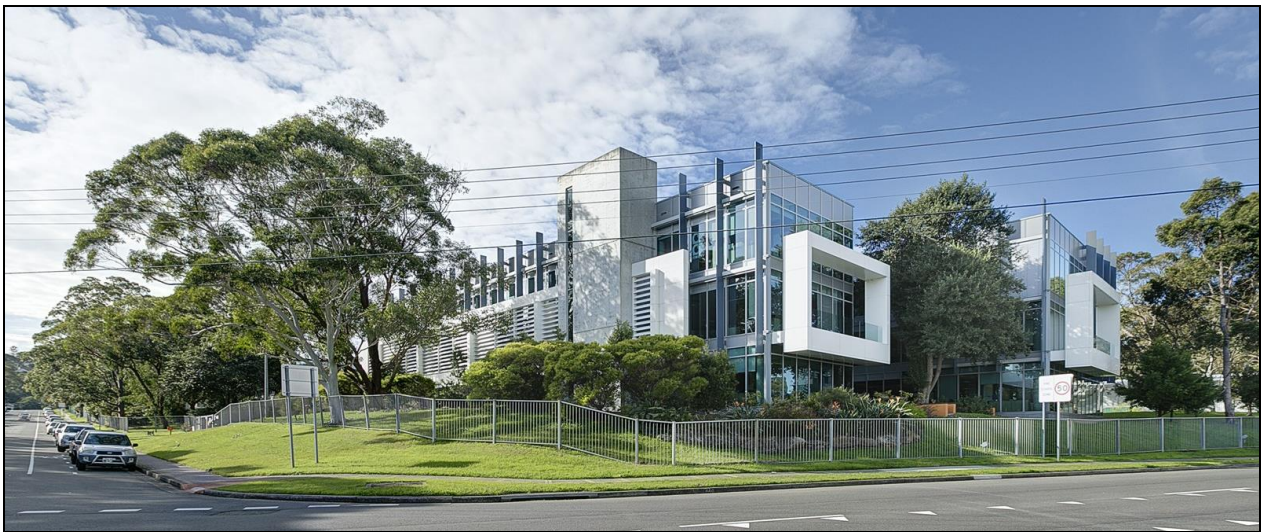
Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

The proposed warehouse building at the south west corner of the subject site will be lower in scale than the existing building and has been designed to complement the retained former Roche office building. The horizontally banded arrangement of the façade is more in harmony with the architectural expression of the former Roche office building than the building that it will replace. Existing canopy trees at the street corner will be retained and augmented by new planting.

Accordingly, careful selection of building finishes and colours, combined with proposed landscape planting, particularly along the southern and western boundaries (South Creek Road and Inman Road frontages) of the subject site, is considered to be appropriately treated from an architectural perspective, as well as being aesthetically pleasing to mitigate any visual impacts. This will assist in screening the built form of the proposed development within the locality.

**Figure 12 to Figure 15** illustrate a comparison of current property views with indicative views based on the proposed development.



**Figure 12** Current property view from corner of Inman and South Creek Road  
(Source: Domain, 2019)



**Figure 13** Proposed property view from corner of Inman and South Creek Road  
(Source: SBA Architects, 2019)

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423



**Figure 14** Current property view from Inman Road entrance (Source: Google, 2019)



**Figure 15** Proposed property view from Inman Road entrance (Source: SBA Architects, 2019)

## 5.7 NOISE

Acoustic Dynamics, as detailed in their Acoustic Assessment (Appendix 12), have assessed noise emission from the proposed industrial development. A review of applicable noise standards and local authority noise criteria was conducted. Noise levels were assessed in accordance with the requirements of Northern Beaches Council, NSW EPA, and Australian Standards.

Further to the noise monitoring and measurements conducted, Acoustic Dynamics' review of the relevant acoustic criteria, requirements and calculations, conclude that the proposed operations would comply with relevant noise emission criteria of the Council and the NSW EPA, where the following recommendations are incorporated:

### 5.7.1 FORKLIFT NOISE RECOMMENDATIONS

Acoustic Dynamics recommends the incorporation of broadband reversing alarms on the forklifts used on site. The broadband reversing alarm would reduce the tonal aspects of the traditional beeping alarm and would maintain the safety of the workers on site.

Additionally, it is recommended that all external forklift activity do not commence before 7am and cease before 10pm.



### 5.7.2 GENERAL NOISE MANAGEMENT

Acoustic Dynamics recommends the following measures to reduce the overall noise impact from the development. Some of the recommendations below may require a review to ascertain the effectiveness of the mitigation measures:

- For any staff requiring access to the ground floor warehouse during the hours of 10pm to 7am (night-time period), preference should be given to the use of the southern driveway entry/exit from South Creek Road, and not the western entry/exit from Inman Road, to reduce the traffic noise levels at the adjacent residence on Orlando Road; and
- Trucks should never use the horn of the vehicle, during the late evening period (8pm to 10pm) and should enter and exit the premises to the south from South Creek Road. Signage indicating the above instructions is to be clearly displayed at the entry and exit to the hardstand and significant penalties should be applied to drivers who ignore this requirement.

Further details are included in the Acoustic Assessment, prepared by Acoustic Dynamics, in **Appendix 12**.

## 5.8 WASTE

### 5.8.1 CONSTRUCTION AND DEMOLITION WASTE

Construction and demolition activities at the subject site will generate a range of wastes, commonly referred to as Construction and Demolition (C&D) waste. Throughout the development process, all materials generated on site will be reused and recycled where possible, minimising the disposal (landfilling) of materials other than those that are contaminated or unsuitable for reuse or resource recovery.

Further details are included in the Waste Management Plan, prepared by MRA Consulting Group, in **Appendix 19**.

### 5.8.2 OPERATIONAL WASTE

Ongoing waste management requirements for the subject site will result from the daily operation of multiple industrial units (with ancillary office space), dedicated office premises and café. Waste storage and management areas will be separate for each of the separate land uses.

Waste generation rates for the site-specific breakdown of commercial and industrial uses are as follows:

- Offices:
  - General waste: 10L/100m<sup>2</sup> floor space per day
  - Recycling: 10L/100m<sup>2</sup> floor space per day
- Warehouses:
  - General waste: 30L/100m<sup>2</sup> floor space per day
  - Recycling: 30L/100m<sup>2</sup> floor space per day
- Cafe:
  - General waste: 300L/100m<sup>2</sup> floor space per day
  - Recycling: 200L/100m<sup>2</sup> floor space per day

Based on the anticipated waste generation rates for the site, a private contractor will be required to collect waste generated at the subject site. MRA Consulting Group recommend that the site operator tender the waste service contract for the entire site and select a waste service provider (WSP), negotiate a service agreement, and pay for these services. The site operator can then include waste management details in lease agreements and general rates for site uses.

The recommended arrangements, access and collection servicing (by MRA Consulting Group) for the subject site are as follows:

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

- Entrance to the subject site via Inman Road;
- Collection of waste and recycling bins will occur directly from each industrial warehouse building, with collection points for café and office related waste being situated towards the entrance of the subject site;
- 1,100L bins shall be collected by a rear-lift vehicle (similar vehicle to collect cardboard, e-waste and film plastic bales) with typical dimensions as follows:
  - 8.8m length,
  - 3.5m operational height, and
  - 24 tonne gross vehicle mass.
- Identifiable areas will be required where users, visitors and WSP staff can recognise and avoid any risk associated with moving vehicles, and bin moving and handling;
- Exit from the subject site will be via the exit point onto South Creek Road.

Further details are included in the Waste Management Plan, prepared by MRA Consulting Group, in **Appendix 19**.

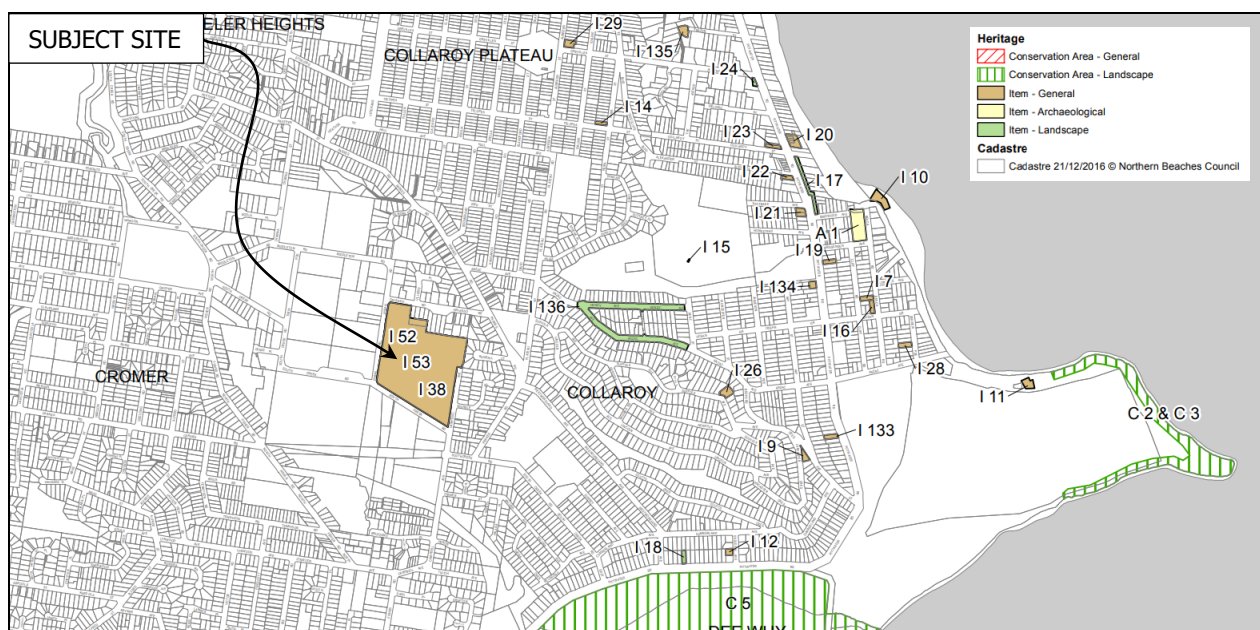
## 5.9 HERITAGE

As depicted in **Figure 16**, the subject site is listed as an item of environmental heritage in Schedule 5 of the WLEP2011. The subject site comprises three (3) items of heritage:

- Item 52: 'Roche Building';
- Item 53: 'Givaudan-Roure Office'; and
- Item 38: 'Trees'.

It is noted that Item 53: 'Givaudan-Roure Office' and Item 38: 'Trees' are in the eastern portion of the subject site, which is outside the scope of this proposal.

Clause 5.10(4) and 5.10(5) of the WLEP2011 require Council to assess the potential heritage impact of non-exempt development, such as the works proposed as part of this development, on the heritage significance of the listed items, and the extent to which the proposal would impact on their heritage significance.



**Figure 16** WLEP2011 Heritage Map (Source: NSW Legislation, 2019)

During the pre-application meeting held with Council, officers raised concerns around the proposed design from a heritage point of view. These concerns were largely around the bulk, scale and design of the complex. Council considered that the previous design did not respect the architectural significance of the



## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

integral components of the Roche complex (in particular, the view of the complex from the internal driveway).

The other areas of concern were the view from Inman Road and the view on the corner of Inman Road and South Creek Road, and how the proposal relates to and respect the horizontal design of the original Roche buildings which are being retained.

The proponent has taken on board Council's comments and accomplished a design that is sympathetic to the existing character of the complex. Figure 12 through to **Figure 15** and **Figure 17** to **Figure 18** demonstrate the consistencies of the current complex compared to the proposed design from various view lines.



**Figure 17** Current property view from carpark towards former Roche main office building  
(Source: Heritage 21, 2019)



**Figure 18** Proposed property view from carpark towards former Roche main office building  
(Source: SBA Architects, 2019)

Heritage 21 have assessed the impacts of the proposed development on the subject site and its heritage items, concluding that the proposed development would not adversely impact on the heritage significance of the subject site, based on the following:

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

- *The proposed development would ensure the continued use of the subject site for industrial and office purposes;*
- *The proposed development would not alter the historic subdivision pattern in the Cromer locality;*
- *The proposed would require and result in the conservation of the most significant buildings on site, being buildings 01, 02, 06 and the hexagonal tower;*
- *The proposed retention of buildings 01, 02, 06 and the hexagonal tower would maintain the existing presentation of the former Roche facility to Inman Road and the immediate area;*
- *The proposed retention of existing soft landscaping and the introduction of additional soft landscaping would maintain the industrial park setting and improve the existing views to the subject site;*
- *The proposed form, scale and design of the new warehouses would minimise the visual impact of the proposed development on the existing setting and would not detract from the significance of the subject site. Notably, the proposed introduction of additional setback of the proposed buildings from the public domain, and the proposed articulation and colours of the new buildings would minimise the visual impact of the proposed buildings on the significance of the subject site; and*
- *The proposal offers the potential to incorporate an extensive interpretive strategy that would convey, to the users of the subject site, the historical significance of the site.*

Heritage 21 have declared their confidence that the proposed development complies with pertinent heritage controls and would have minimal impact on the heritage significance of the subject site.

Further details are included in the Conservation Management Plan and Heritage Impact Statement, prepared by Heritage 21, and included in **Appendix 9** and **Appendix 10** concurrently.

### 5.10 FLORA AND FAUNA

Eco Logical Australia has undertaken a Biodiversity Constraints Assessment (**Appendix 13**) for the subject site, providing a description of the known and potential biodiversity constraints in the site and detail on relevant biodiversity and planning legislation and controls at a Commonwealth, state and local government level, including the likely assessment requirements for threatened biodiversity as a result of potential future development in the site.

The main finding of this report are as follows:

1. *The following vegetation communities were identified in the study area:*
  - *Peppermint Angophora Forest (recognised as a vegetation community)*
  - *Native plantings and weeds – landscaped riparian area*
  - *Mixed native and exotic landscaped plantings*
2. *The study area contains areas of moderate and low levels of ecological constraint.*
3. *The study area does not provides known or potential habitat for Threatened Ecological Communities or threatened flora species listed under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 and/or the Threatened Species Conservation Act 1995.*
4. *The study area provides potential habitat for the following threatened fauna species listed under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 and/or Threatened Species Conservation Act 1995:*
  - *Pteropus poliocephalus (Grey-headed Flying-fox)*
  - *Falsistrellus tasmaniensis (Eastern False Pipistrelle)*
  - *Mormopterus norfolkensis (Eastern Freetail Bat)*
  - *Saccolaimus flaviventris (Yellow-bellied Sheath-tail-bat)*
  - *Scoteanax rueppellii (Greater Broad-nosed Bat)*
  - *Chalinolobus dwyeri (Large-eared Pied Bat)*
  - *Miniopterus australis (Little Bent-wing Bat)*
  - *Miniopterus schreibersii oceanensis (Eastern Bent-wing Bat)*
5. *The arborist report has listed the trees which are most suitable for retention within the study area. Those trees that have been given the lowest rating should be determined to be a non-constraint on any proposed development. Those trees that have been given the highest rating are*

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

*worthy of retention and should be incorporated as a part of the final design of the development proposal.*

6. *If it was determined that the creekline does not meet the WM Act classification. Therefore, any activity in the study area is not within 40 m of what is classified as a 'river' therefore a controlled activity approval on waterfront land is not required under the NSW Water Management Act. 2000.*
7. *Council's Protection of Waterways and Riparian Land Policy recommends a 10m riparian zone plus a 10m riparian buffer (total 20m buffer) on both sides of the creekline as part of any proposed development within the study area.*

A Biodiversity Development Assessment Report (BDAR) has been prepared in accordance with the BC Act, and included in **Appendix 14**.

### 5.11 CUMULATIVE IMPACT

No foreseeable cumulative impacts are to result from the proposed development.

### 5.12 CONSTRUCTION

Construction activities would be undertaken in accordance with any conditions of consent, ensuring that appropriate measures would be undertaken to mitigate any potential impacts from the construction of the proposed development including dust, noise, odour and traffic.

### 5.13 BUILDING CODE OF AUSTRALIA

The proposal would achieve compliance with Building Code of Australia (BCA), subject to further consideration during design development. The BCA Statement is provided at **Appendix 1** for further reference.

### 5.14 SUITABILITY OF SITE FOR DEVELOPMENT

The proposed development supports the continued function of the subject site for industrial and commercial operations. The proposed development supports the continued use of the subject site and preserves its amenity as well as the amenity of all surrounding properties. The proposed development would not exhibit any significant environmental impacts and would not adversely impact the amenity of any adjoining properties.

The proposed warehouse and self-storage units are consistent with the intent of the IN1 General industrial zone. Whilst not entirely consistent with the intent of the IN1 General industrial zone, the café and office premises are proposed to afford sympathetic reuse of existing character buildings, which are not considered suitable for industrial-type uses.

Pursuant to Part 2 and Part 5, Clause 5.10(10), of the WLEP2011, the proposed development is considered suitable for the subject site.

### 5.15 SOCIAL AND ECONOMIC IMPACTS

The proposed development would not result in any adverse social or economic impacts. The proposed development would enhance the functionality of the building for its present commercial use, thereby promoting economic benefits.

### 5.16 SUBMISSIONS

No submissions have been received in relation to the proposed development at the time of writing. However, the applicant is willing to address any submissions, should they be received by Council.

### 5.17 THE PUBLIC INTEREST

## Statement of Environmental Effects

Proposed alterations and additions to an existing industrial facility, offices and ancillary café  
4 – 10 Inman Road, Cromer (Lot 1 DP1220196)

WTJ19-423

The proposed development would have no adverse impact on the public interest. The proposed works would support the economic viability of the commercial building for future users, resulting in:

- Long term employment generation, with associated benefits for the Northern Beaches economy;
- Reactivation and intensification of a redundant manufacturing and corporate office campus for employment and urban service outcomes;
- Support for local businesses and creation of creative industry and incubator opportunities within the Northern Beaches;
- Retail (café) amenity for local workers onsite, within the Cromer industrial precinct and users of the nearby recreational grounds (particularly over the weekend periods);
- Protection and enhancement of existing drainage corridor, including partial reinstatement of riparian environment settings;
- Short term job creation over the construction period; and
- Retention conservation and sympathetic reuse of local heritage items.



## **PART F CONCLUSION**

This SEE has been prepared by Willowtree Planning on behalf of EG, the proponent, and is submitted to Northern Beaches Council (Council) to support a Development Application (DA).

This DA seeks development consent for proposed alterations and additions to an existing industrial facility, for warehouse, industry and self-storage, office premises and ancillary café, at 4 – 10 Inman Road, Cromer (subject site), more formally described as Lot 1 DP1220196.

The subject site was home to the former Roche Pharmaceutical Corporate and Manufacturing Campus situated on the periphery of the Cromer Industrial Precinct, which has been inactive for a number of years. The subject site is approximately 7.5 hectares in area, currently zoned IN1 General Industrial contains a number of heritage buildings and landscape elements and is in common ownership. It is one of the largest employment zoned sites in the Northern Beaches local government area (LGA) and is therefore a strategically significant site not only within the LGA but within the North District.

The subject site offers the potential for a diverse range of local urban service outcomes including creative and hi-tech industries, modern warehousing local business 'start-up' incubators and a place for innovation.

The proposal is considered to warrant a favourable determination for the following reasons:

- The intent of the proposed development is to allow for the effective reuse of the former Roche premises, while contributing to the existing industrial character experienced within the IN1 General Industrial zone and within the immediate vicinity of the subject site, consistent with the WLEP2011 and WDCP2011.
- The proposed development complies with pertinent heritage controls and would have minimal impact on the heritage significance of the subject site, and seeks to conserve buildings 01, 02, 06 and the hexagonal tower, and soft landscaping along the Inman Road and South Creek Road frontages.
- The proponent has taken on board Council's comments and accomplished a design that is sympathetic to the existing character of the complex.
- The proposed development seeks to support the continued function of the subject site for industrial and commercial operations.

Pursuant to Part 2 and Part 5, Clause 5.10(10), of the WLEP2011, the proposed development is considered suitable for the subject site.

As stipulated previously in this SEE, the matters for consideration under Section 4.15(1) of the *Environmental Planning and Assessment Act 1979* have been satisfactorily addressed.

Considering the merits of the proposed development and in absence of any significant environmental impact, the proposed development warrants support by Council.