

WILLOWTREE PLANNING



2 June 2024

REF: WTJ23-303

Northern Beaches Council
725 Pittwater Road
Dee Why NSW

Attention: Reeve Cocks

RE: DA2024/0172 - USE OF PREMISES AS GENERAL INDUSTRY AND ASSOCIATED ALTERATIONS AND ADDITIONS

PROPERTY AT: 75 OLD PITTWATER ROAD, BROOKVALE

Dear Reeve,

This letter has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning) on behalf of Harrison SPARC. This letter includes the response to Northern Beaches Council's Request for Information (RFI) PAN-414063, dated 17th May 2024.

Council's RFI includes matters associated with compliance against the car parking requirements of the *Warringah Development Control Plan 2011 (WDCP2011)*. In this context, regard must be had for the provisions of section 4.15(3A) of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, which provides as follows:

*(3A) **Development control plans** If a development control plan contains provisions that relate to the development that is the subject of a development application, the consent authority—*

- a) if those provisions set standards with respect to an aspect of the development and the development application complies with those standards—is not to require more onerous standards with respect to that aspect of the development*

In accordance with the above, as compliance with the car parking requirements of WDCP2011 has been demonstrated (see **Appendix 1**), the Council is not to require more onerous standards with respect to car parking.

All the matters raised have been taken into consideration and are addressed in the response matrix below.

It is considered that this information responds to Council's additional information request, allowing the application to be progressed by Northern Beaches Council.

The following appendices provide documentation and reports to support the response listed in **Table 1**.

Appendix 1 - Updated Traffic and Parking Advice - Varga Traffic Planning Pty Ltd

Appendix 2 - Updated Cover Sheet and Site Plan

Appendix 3 - Harrison Investments Letter

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willowtreeplanning.com.au
02 9929 6974



SYDNEY | NEWCASTLE | GOLD COAST | BRISBANE



Should you require further information, please contact me on 0418 443 167 / apigott@willowtp.com.au.

Your sincerely,

A handwritten signature in blue ink that reads "A Pigott".

Andrew Pigott

Director

Willowtree Planning Pty Ltd





Table 1: Response Matrix	
Council Comments	Proponent Response
Parking	
<p><i>Development Consent for the site was previously granted for the construction of a single storey warehouse with ancillary carparking and on-site stormwater detention system under DA2004/1324. At the time of the application, the assessment report identified existing parking provisions of 38 parking spaces in the administration building hardstand area and 162 unpaved spaces in the grass area used for overspill parking. The Conditions of Consent required the provision of 26 off-street car park spaces, paved, line marked and signposted in accordance with the Australian Standards. The additional spaces were provided in constructed hardstand areas adjacent to the internal access road, opposite the factory and as an extension to area for the administration building. The development therefore should provide 64 constructed off-street parking spaces as well as the 162 unpaved spaces in the grass area, resulting in a total overall parking capacity of 226 spaces.</i></p> <p><i>The TPA states the existing proposal provides for a total of 91 parking spaces for the site (not including the informal 162 overspill parking). The 91 parking spaces are shown on the Site Plan Drawing Number DA-05 Rev.A. The previous approval provided 64 constructed off-street parking spaces and it appears that the majority of the additional 27 car park spaces of the 91 parking spaces are situated along the eastern side (unpaved) of the internal access road leading to the factory, with some spaces located as part of extensions to the areas provided under the previous approval. Some of these spaces are not marked (or faded) or used for storage, in particular the parking spaces located in the area opposite the factory. All spaces included</i></p>	<p>A comprehensive response to the parking and traffic matters raised by Council is provided via the updated Traffic and Parking Advice prepared by Varga Traffic Planning Pty Ltd at Appendix 1. This advice confirms that historical car parking at the site by a local car dealer has ceased (see confirmation letter at Appendix 3) and that the car parking requirements of Council's WDCP2011 will be exceeded.</p> <p>Details demonstrating the provision of 36 bicycle parking spaces are provided at Appendix 2.</p>





as part of the provided 91 car park spaces must therefore be paved, clearly marked and unobstructed to be considered. The TPA states that the proposed development will not have any unacceptable parking implications, as the proposal provides 91 off-street parking spaces and the WDCP only require 80 car spaces based on the GFA use. The existing parking demand for the site however is substantially higher based on historical and existing parking usage, which can be shown in aerial images of the site over the past 15 years. The area marked for the proposed works provides up to 56 spaces, with the most recent images this year showing 34 vehicles parked in this area. It is therefore unreasonable to expect that the removal of the area currently used for parking would not have any significant impact and therefore additional measures to address the loss of available parking should be considered. These parking concerns and impacts were previously raised in the pre-lodgement notes. There is opportunity to provide an additional 6 angled parking spaces in the area vacated due to the relocation of the demountable building. The parking spaces should be 90-degree angle parking and constructed to the same standard as the existing approved parking spaces (2.5m x 5.4m).

The Warringah Development Control Plan (WDCP) 2011 specifies requirements for the provision of bicycle parking to encourage alternative transport modes and reduce reliance on private motor vehicles. Three bicycle spaces (2 staff and 1 visitor) are required based on the total area of the laboratory, however the existing site does not seem to provide any bicycle parking facilities. The minimum bicycle parking requirements for light and general industry land use under the WDCP would require 36 bicycle parking spaces (26 staff and 10 visitor) for the site area. Provision of the required bicycle rack numbers distributed proportionally near each of the buildings would help offset the loss of parking spaces for this development site.





31 May 2024
Ref 23431

Northern Beaches Council
75 Pittwater Road
DEE WHY NSW 2099

Attn: Mr Reeve Cocks

Dear Reeve

DA 2024/0172
PROPOSED NEW LABORATORY
PARKING MATTERS

I refer to your letter dated 17 May 2024 requesting additional information in respect of the abovementioned development proposal.

Please find attached updated plans illustrating the existing 91 parking spaces, and the proposed provision of 38 bicycle parking spaces, as requested.

Also attached is a letter from *Harrison Investments* dated 22 May 2024 confirming that, until recently, the site had also been used by a local car dealer as a temporary storage area for their cars. These car storage areas are visible on historical aerial photos, including on Sundays, when the staff parking areas were largely vacant.

The use of these areas for *car storage* purposes has now ceased.

The off-street parking requirements applicable to the development proposal are specified in the Northern Beaches Council's *Warringah Development Control Plan 2011, Part H – Appendices* document in the following terms:

Appendix 1 Car Parking Requirements

Industry, Warehouse or Distribution Centre*: 1.3 spaces per 100m² GFA

*Including up to 20% of floor area as office space component. Office space component above 20% determined at office rate.

Office premises: 1 space per 40m² GFA

Reference is also made to the operational characteristics of the proposed new laboratory (74.4m²) which will have a maximum capacity of 6 staff.

Application of the above parking requirements to the various existing and proposed new components of the development proposal yields a cumulative off-street car parking requirement of 80 car spaces for the entire site, as set out below:

Off-Street Parking Requirements

Existing Warehouse (1071m ²):	13.9 spaces
Existing Factory (2385m ²):	31.0 spaces
Existing Office (1503m ²):	
Office > 20% floor area (511m ²):	12.8 spaces
Office ≤ 20% floor area (992m ²):	12.9 spaces
Existing Laboratory (292m ²):	7.3 spaces
Proposed New Laboratory (74.4m ² , 6 staff):	1.9 spaces
TOTAL:	79.8 spaces

That requirement is satisfied by the existing parking of 91 parking spaces on the site.

The existing parking provision of 91 car parking spaces satisfies the DCP parking requirements of both the existing uses on the site as well as the proposed new laboratory, with a surplus of 11 parking spaces.

The 91 parking spaces comprise 81 paved and line-marked parking spaces plus 10 parking spaces in a gravel, all-weather parking area (which are *surplus* to Council's DCP parking requirements).

It is proposed to retain the 10 gravel, all-weather car parking spaces, particularly in circumstances where these spaces are *surplus* to Council's DCP parking requirements.

Lastly, it is noted that, in practical terms, the daily need for staff car parking on the site has reduced because the applicant's group staff policy now requires attending the office only 3 days per week.

Accordingly, the 81 existing paved and line-marked parking spaces satisfy Council's DCP parking requirements, *including* the parking requirements under the DCP for the proposed new laboratory.

Lastly, it is noted the proposed laboratory will be involved in testing small samples (typically less than 500g) generated elsewhere on the site. External deliveries to the proposed laboratory will be absolutely minimal, if any, and would be undertaken by small "white vans" such as the *Hyundai i-Load* or similar vehicle which can be accommodated in conventional parking spaces.

Please do not hesitate to contact me on telephone 9904 3224 should you have any enquiries.

Yours sincerely



Robert Varga
Director
Varga Traffic Planning Pty Ltd

AREA OF PROPOSED WORKS



FOR DEVELOPMENT APPLICATION SUBMISSION

ADDRESS: 75 OLD PITWATER ROAD, BROOKVALE NSW 2100

PREPARED FOR: SPARC HARRISON

PREPARED BY: WATCH THIS SPACE DESIGN PTY LTD
LEVEL 3, SUITE 12, 35 BUCKINGHAM STREET, SURRY HILLS, NSW 2010

DATE: MAY 2024

DRAWING LIST

SHEET NO.	SHEET NAME	ISSUE DATE	CURRENT REVISION
DA - 01	COVER SHEET	04/12/2023	E
DA - 02	SURVEY PLAN - OVERALL SITE	01/12/2023	A
DA - 03	SURVEY PLAN - AREA OF PROPOSED WORKS	01/12/2023	A
DA - 04	SITE ANALYSIS PLAN	01/12/2023	A
DA - 05	SITE PLAN	27/05/2024	E
DA - 06	PROPOSED FLOOR PLAN	01/12/2023	A
DA - 07	SECTIONS (PAGE 1 OF 2)	01/12/2023	A
DA - 08	SECTIONS (PAGE 2 OF 2)	01/12/2023	A
DA - 09	PHOTOMONTAGE	01/12/2023	A
DA - 10	PROPOSED LABORATORY DETAILS 1	01/12/2023	A
DA - 11	PROPOSED LABORATORY DETAILS 2	01/12/2023	A
DA - 12	PROPOSED LABORATORY DETAILS 3	01/12/2023	A
DA - 13	RELOCATED DEMOUNTABLE DETAILS 1	01/12/2023	A
DA - 14	RELOCATED DEMOUNTABLE DETAILS 2	01/12/2023	A



Architect

WATCH THIS SPACE DESIGN PTY LTD

LEVEL 3, SUITE 12, 35 BUCKINGHAM STREET, SURRY HILLS NSW 2010
EMAIL: info@watchthisspacedesign.com
WEB: www.watchthisspacedesign.com

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Amendment

- P1 PRELIMINARY
- A FOR DA ISSUE
- B FOR DA ISSUE
- C FOR DA ISSUE
- D FOR DA ISSUE
- E FOR DA ISSUE

date

- 01/08/23
- 01/12/23
- 04/12/23
- 04/12/23
- 27/05/24
- 28/05/24



Client

SPARC HARRISON

Project Location
75 OLD PITWATER ROAD,
BROOKVALE NSW 2100

Drawn
KB
Scale
@A3

Checked
AV
Date
04/12/2023

Approved
PM
Date
04/12/2023

Drawing Title

COVER SHEET

Project Number
HS 750L

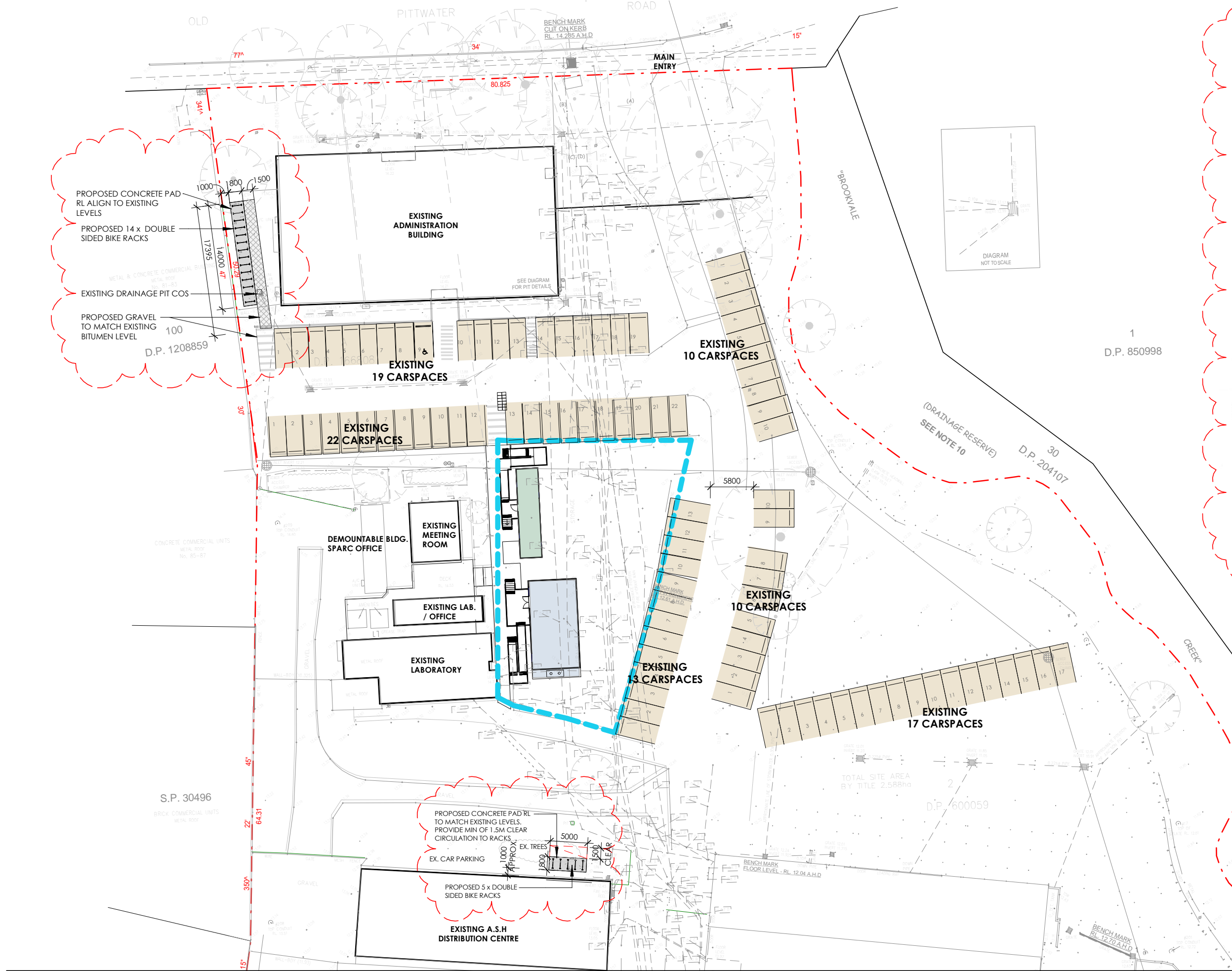
Status

FOR DA ISSUE

Rev

Drawing Number
DA - 01

E



LEGEND

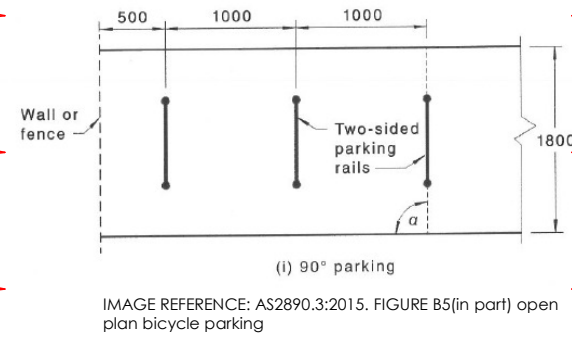
	EXISTING CAR PARKING AREAS TOTAL NO. OF CAR SPACES: 91
	RELOCATED EXISTING DEMOUNTABLE
	PROPOSED LABORATORY
	AREA OF PROPOSED WORKS
	PROPOSED CONCRETE PAD

NOTES

REFER TO THE LATEST SURVEY FOR EXISTING LEVELS INFORMATION

BIKE RACKS

SUPPLIER : SECURABIKE OR SIMILAR
 RANGE: LARGE 2 BIKE RAIL - BASE PLATE
 MODEL : BR12F FIXED
 SIZE: 1200 x 800mm H.
 FINISH: GALVANISED
 TYPICAL BIKE RACK TO COMPLY WITH AS2890.3 APPENDIX B.



Architect
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Amendment	date
A FOR DA ISSUE	01/12/23
B FOR DA ISSUE	04/12/23
C FOR DA ISSUE	04/12/23
D FOR DA ISSUE	27/05/24
E FOR DA ISSUE	28/05/24



Client
 SPARC HARRISON
 Project Location
 75 OLD PITWATER ROAD,
 BROOKVALE NSW 2100

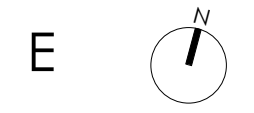
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Checked
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 Date
 27/05/2024

Approved
 PM
 Date
 27/05/2024

Drawing Title
 SITE PLAN
 Project Number
 HS 750L
 Status
 FOR DA ISSUE

Drawing Number
 DA - 05





HARRISON INVESTMENTS Pty Ltd

22nd May 2024

Mr Reeve Cocks
Planner
Department of Assessment – South Team
Northern Beaches Council
725 Pittwater Road
Dee Why NSW 2099

Dear Mr Cocks,

Regarding DA 2024/0172: In reference to your email to Macy Fenn, Willowtree Planning, dated 17th May 2024.

I have been approached by Andrew Pigott, of Willowtree Planning, to provide the officers of Northern Beaches Council with information regarding the area covered by the above DA.

The area under discussion had been, until recently, informally used by a local car dealer to unload and temporarily store their surplus vehicles when delivered off the ship. This informal agreement has now ceased, and the area is free of overspill cars, nor is the area required by staff car parking on our site.

Furthermore, since our Group staff policy now requires attending the office only three days a week, with specific days determined by respective managers, the daily need for staff car parking at our site has reduced.

I believe the car parking for our staff, including that proposed for Harrison SPARC demountable laboratory building, will be sufficient for present, as well as future staff needs.

Kind regards,

Julie Harrison

Director & Company Secretary
Harrison Investments Pty Limited