



Statement of Environmental Effects

Self-storage units and warehouse and distribution centre
uses

14 Aquatic Drive, Frenchs Forest

Prepared for Goodman Property Services (Aust.) Pty Ltd

Submitted to Northern Beaches Council

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1 Introduction

This Statement of Environmental Effects (SEE) has been prepared by Keylan Consulting Pty Ltd (Keylan) on behalf of Goodman Property Services (Aust.) Pty Ltd (Goodman) to accompany a development application (DA) for self-storage units and warehouse and distribution centre at 14 Aquatic Drive, Frenchs Forest.

This SEE has been prepared and is submitted to Northern Beaches Council (Council) pursuant to the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The proposal is Regionally Significant Development (RSD) as it is general development with an estimated development in excess of \$30 million. Therefore, the Sydney North Planning Panel is the consent authority.

The proposed development comprises construction of a three-storey building comprising:

- demolition of existing buildings and structures on the site
- 153 self-storage units at ground floor and Level 1;
- 72 warehouse units on Levels 1 and 2;
- 123 car parking spaces across all levels;
- outdoor breakout spaces for staff at ground floor and Level 2;
- shared lobby across all levels;
- landscaping; and
- associated infrastructure/servicing works.

Approval is sought for 24/7 operation of both the self-storage and warehouse and distribution units.

This SEE describes the site, its surroundings and the proposed development. It provides an assessment of the proposals in terms of the matters for consideration under section 4.15(1) of the EP&A Act.

This SEE demonstrates that the proposed development is generally consistent with the relevant provisions of the:

- *Warringah Local Environmental Plan 2011*
- *Warringah Development Control Plan 2011*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*

This SEE concludes that the proposal warrants approval as it is an appropriate use of the site, will provide substantial net economic benefits and will not result in any significant environmental impacts.

1.1 Report structure

The SEE has been prepared in line with the requirements of Part 4 of the EP&A Act. The structure of the report is as follows:

Section	Overview
Executive summary	An overarching summary of the findings and conclusions of the assessment contained within this SEE.
1. Introduction	Introduction to the SEE.
2. Site and locality	A description of the site, the site context and an assessment of the opportunities and constraints presented by the site.
3. The proposal	A detailed description of the proposed development.
4. Strategic planning context	A detailed review of the proposal against the State and local planning framework including an assessment of statutory and strategic planning considerations.
5. Statutory planning context	A detailed review of the proposal against relevant statutory planning legislation.
6. Environmental planning assessment	An in-depth assessment of the relevant planning controls, existing environment, proposal and potential impacts and public benefits arising from the proposed development application.
7. Conclusion	A concluding statement taking into account the assessment of the proposal and a recommended course of action with regard to the determination of the application.

Table 1: Statement of Environmental Effects report structure

This SEE should be read in conjunction with the following supporting documents:

Appendices	Supporting documentation
Appendix 1	Estimated Development Cost
Appendix 2	Architectural Plans
Appendix 3	Landscape Plans
Appendix 4	Civil Plans
Appendix 5	Civil Report
Appendix 6	Geotechnical Investigation
Appendix 7	Detailed Site Investigation
Appendix 8	Transport Assessment
Appendix 9	Noise Impact Assessment
Appendix 10	Arborist Report

Appendices	Supporting documentation
Appendix 11	Bushfire Hazard Assessment
Appendix 12	Sustainability Management Plan
Appendix 13	Waste Management Plan
Appendix 14	BCA & Accessibility Assessment Report
Appendix 15	Survey Plan
Appendix 16	Infield Utilities Report
Appendix 17	Fire Safety Strategy
Appendix 18	Embodied Emissions Form
Appendix 19	Warringah DCP 2011 Assessment

Table 2: List of appendices

1.2 Consent authority

The Estimated Development Cost for the purpose of determining the DA fee for the proposal is calculated in line with Part 9, Division 2, Clause 208(1) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) at \$63,160,000 (Appendix 1).

As the estimated cost of works exceeds \$30 million, the DA will be determined by the Sydney North Planning Panel.

It is noted that the proposal does not meet the State Significant Development criteria under Section 12 *Warehouse or distribution centres* of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021*, as:

- the warehouse units are to be strata subdivided and therefore are not “related to the same operation”; and
- the cost associated with the warehousing aspect of the development is below \$50 million as broken down in the Estimated Development Cost Report.

1.3 Pre-lodgement meeting

A pre-lodgement meeting was held with Northern Beaches Council on 6 August 2024 to discuss key issues associated with the development application.

A summary of the key issues raised and response is detailed in the table below:

Council Comment	Response	SEE Reference
Warringah DCP 2011		
Main road setback <ul style="list-style-type: none"> <i>Control: 30m Warringah Road</i> <i>The Main Roads setback is an increased setback</i> 	The proposal provides for a varied setback to Warringah Road with respect to the shape of the	Section 5.7 Appendix 2 Appendix 19

Council Comment	Response	SEE Reference
<p><i>requirement but allows for exceptions for carparking that may be permitted between 15 to 30 metres from the road boundary, subject to screening from view.</i></p> <p>...</p>	<p>allotment and curve of Warringah Road adjacent to the site.</p> <p>The setback to the road reserve of Warringah Road ranges from 15.4m at the western end of the building up to 23.2m at the eastern end of the building.</p> <p>It is noted that the proposal maintains the existing setback at the eastern end of the building whilst decreasing it at the western end. Notwithstanding, this is considered acceptable given the current development includes car parking within this area which the proposed building footprint aligns with. Additionally, the proposal continues to meet the objectives of the Main Road Setback control as:</p> <ul style="list-style-type: none"> • All existing plantings within the main road setback are to be maintained which currently provide good screening of the development. These are to be maintained with respect to their 'Biodiversity Values' as identified under the Biodiversity Conservation Act 2016. • The proposed development provides for a contemporary industrial building with high quality finishes and materials which will enhance the aesthetic quality of main roads. • The proposal has been revised in light of Council's comments to soften any impacts as a result of the encroachment into the main road setback by providing a breakout space at the north-western corner of Level 2. This reduces the overall perceived bulk and massing at 	

Council Comment	Response	SEE Reference
	the buildings closest point to Warringah Road	
<p><i>Front setback</i></p> <ul style="list-style-type: none"> Control: 10m (other roads - Rodborough Road) <p>...</p>	<p>The proposal is located on a battle-axe lot whereby the entire 'battle-axe' portion of the site is utilised for access and parking. The existing driveway configuration is maintained as this currently provides for appropriate access to the site for cars and medium rigid vehicles.</p>	<p>Section 5.7 Appendix 2 Appendix 19</p>
<p><i>Side setback</i></p> <ul style="list-style-type: none"> The proposal should maintain similar side setbacks to the existing building or wider for practicable access. It is noted that some "opening up" of the southern elevation (and upper storey) was included with a revised set of plans after DSAP Review. <p>...</p>	<p>The zero lot setback to the east is maintained whilst the western side setback is slightly reduced.</p> <p>The setback to the western boundary is proposed to be 12.8m whilst currently, a 16.7m setback is provided. It is noted that the existing setback predominantly consists of hardstand whilst the proposed setback would mostly be landscaped with a pedestrian pathway running through the centre.</p>	<p>Section 5.7 Appendix 2 Appendix 19</p>
<p><i>Building footprint</i></p> <ul style="list-style-type: none"> Control: 33.3% Concern is raised that the building footprint (landscaping component) allowable area are distorted by the access handle area that increases the overall site. Normally this would be excluded, however, the width allows significant space for carparking areas as has been used with the original development of the property in the late 1980's as a corporate office building. A balance of landscaping and building footprint should therefore be acknowledged due to the wide access corridor. Hence the building mass in the NW corner should be pulled back from the Main Road setback to balance the 3 components (distribution) of 	<ul style="list-style-type: none"> The proposed site cover is 53%, noting the existing site cover is also non-compliant at 42.8%. Despite the non-compliance with the control, the proposal meets the objectives of the control as: <ul style="list-style-type: none"> The proposal provides increased and enhanced landscaping at the site displayed by the Landscape Plans at Appendix 3. The proposal increases the overall landscaped area at the site from 17% to 25% (i.e. from 2,593m² to 3,815m²) The perceived bulk and scale of the development is broken up through articulation and materiality as shown in the 	<p>Section 5.7 Section 6.1 Appendix 2 Appendix 19</p>

Council Comment	Response	SEE Reference
<p><i>built form applying to the land (being LOS, footprint, ancillary elements).</i></p> <p>...</p>	<p>Architectural Plans at Appendix 2.</p> <ul style="list-style-type: none"> ○ A comprehensive stormwater management system has been designed to reduce runoff and prevent erosion and siltration as provided for at Appendix 4 and 5. ○ Despite the building's site cover slightly increasing, the overall hardstand associated with parking and circulation spaces has reduced which has allowed for additional plantings. • As noted above, the proposal results in an increase in the total landscaped area at the site. This is directly related to the reduction in hardstand along the battle-axe handle and western boundary of the site which has allowed for additional plantings. 	
<p><i>Landscaping Control: 33.3%</i></p> <ul style="list-style-type: none"> • <i>All landscaping must be at ground level and at least 1 metre deep of soil and 2 metres wide to be included as landscaping.</i> <p>...</p>	<ul style="list-style-type: none"> • The proposal will have 25% landscaped area which is considered acceptable noting this is increased from the current 17% provided at the site and it will achieve the objectives of the control as follows: <ul style="list-style-type: none"> ○ there will be increased planting and quality of the landscaping compared to the existing site conditions; ○ it will enhance privacy to neighbouring buildings, particularly to the east; ○ the irregular shape of the site, the biodiversity values, and bushfire affectation of the site make it difficult to 	<p>Section 5.7 Section 6.2 Appendix 3 Appendix 19</p>

Council Comment	Response	SEE Reference
	<p>increase landscaping at the site</p> <ul style="list-style-type: none"> As detailed against the site cover control above, the proposal results in an overall net increase to landscaped area from existing. 	
Specialist Advice		
Development Engineering		
<ul style="list-style-type: none"> <i>The site is burdened by Council stormwater infrastructure and a drainage easement. In accordance with Section 6.7.1 of Council's Water Management for Development Policy, the applicant must accurately locate, confirm dimensions including depth, and plot to scale Council's stormwater pipelines and infrastructure on the development application site plans that outline the proposal.</i> <p>...</p> <ul style="list-style-type: none"> <i>The proposal indicates that this infrastructure may be impacted by the proposal. In this regard the proposal is to be designed in accordance with the requirements of Section 6.1 of Council's Water Management for Development Policy.</i> <i>The subject property is possibly burdened by overland flows from upstream catchments. Based on the current proposal it appears that the basement floor may be affected by overland flow.</i> <p>...</p> <ul style="list-style-type: none"> <i>The proposal will require on-site stormwater detention (OSD) designed in accordance with Section 9.3.2 of Council's Water</i> 	<p>A Survey Plan and Infield Utilities Report are provided at Appendix 15 and Appendix 16 respectively. These documents clearly identify any infrastructure and easements within the site.</p> <p>The Survey Plan and Infield Utilities Report have informed the Civil Plans and Civil Report and subsequent stormwater design to ensure there are no impacts on existing Council assets.</p>	<p>Section 6.3 Appendix 4 Appendix 5 Appendix 15 Appendix 16</p>

Council Comment	Response	SEE Reference
<i>Management for Development Policy.</i>		
Traffic Engineering		
<ul style="list-style-type: none"> <i>The proposal is for self-storage units at basement level and warehousing/distribution on the ground and first level:</i> <ul style="list-style-type: none"> <i>Parking appears to exceed Council's Warringah DCP requirements, given the small size of the warehouse units, the excess parking is considered necessary.</i> <i>It appears all levels are to be accessible by medium rigid vehicles (MRV). This size of vehicle is considered appropriate for the size and type of development. This will however mean that overhead clearance throughout each level of 4.5m will be required to ensure units can be accessed.</i> <i>The capacity for passing of two MRVs on ramps will be required.</i> <p>...</p>	<p>The proposed car parking meets the relevant requirements of the Warringah DCP. It is noted that no requirements are outlined for self-storage units under the DCP and, therefore, the recommendations under the <i>Supporting the self storage industry of Australia and New Zealand</i> document prepared by Stantec were utilised for self-storage parking rates.</p> <p>The Transport Statement at Appendix 8 confirms that a Medium Rigid Vehicle and access and utilise all floor levels given widths of circulation spaces.</p> <p>The Transport Statement also provides a comprehensive response to all of Council's traffic related comments under the Pre-DA.</p>	Section 6.4 Appendix 8
Landscape Architect		
<ul style="list-style-type: none"> <i>Specific review by Council's Landscape Architect:</i> <ul style="list-style-type: none"> <i>proposed landscaped setback to Warringah Road.</i> <i>provision of landscaped open space at the site.</i> <i>impact of development to existing trees.</i> <i>Relevant Warringah Development Control Plan</i> 	<p>The Main Roads setback is addressed above.</p> <p>Landscape provision has also been addressed above.</p> <p>A Landscape Plan and Arborist Report accompany this application at Appendix 3 and Appendix 10.</p>	Section 5.7 Section 6.2 Appendix 2 Appendix 3 Appendix 10 Appendix 19

Council Comment	Response	SEE Reference
<p><i>clauses: B14 Main Roads Setback</i></p> <p>...</p> <ul style="list-style-type: none"> <i>D1 Landscaped Open Space</i> <p>...</p> <ul style="list-style-type: none"> <i>E1 Preservation of Trees or Bushland Vegetation</i> <p>...</p> <ul style="list-style-type: none"> <i>Landscape Architects comments: B14 Main Roads Setback</i> <p>...</p> <ul style="list-style-type: none"> <i>D1 Landscaped Open Space</i> <ul style="list-style-type: none"> <i>Proposal does not achieve the 33.3% requirement.</i> <p>...</p> <ul style="list-style-type: none"> <i>E1 Preservation of Trees or Bushland Vegetation:</i> <p>...</p> <ul style="list-style-type: none"> <i>DA requirements</i> <ul style="list-style-type: none"> <i>Landscape Plans</i> <i>Arboricultural Impact Assessment</i> 		
Environmental Health (Contaminated Lands)		
<ul style="list-style-type: none"> <i>In the event the proposed PSI requires a DSI Council cannot grant consent until:</i> <p>...</p>	<p>A Detailed Site Investigation (DSI) has been prepared and confirms the site can be made readily suitable for the proposed development. The DSI also confirms that a RAP is not warranted.</p>	<p>Section 6.6 Appendix 7</p>
Environmental Health (Industrial)		
<ul style="list-style-type: none"> <i>An acoustic report is to be prepared and submitted with the Development Application and it must include details on the following but not limited to</i> <p>...</p>	<p>A Noise Impact Assessment (NIA) has been prepared by SLR Consulting. The NIA confirms that the proposal will generally comply with noise requirements for industry during both construction and operation.</p>	<p>Section 6.5 Appendix 9</p>
Water Management		
<ul style="list-style-type: none"> <i>The development site is subject to the following controls specific to water</i> 	<p>The proposed stormwater management system has been designed in accordance with the DCP and relevant Council policy</p>	<p>Section 6.3 Appendix 4 Appendix 5 Appendix 6</p>

Council Comment	Response	SEE Reference
<i>management quality and quantity:</i> <ul style="list-style-type: none"> ○ <i>Warringah DCP 2011 Section C4 Stormwater</i> ○ <i>Northern Beaches 'Water Management for Development Policy' (WM) Section 4 Protecting the Environment, and Section 7 Water Conservation</i> ...	<p>as detailed within the accompanying Civil Report.</p> <p>A Geotechnical Report has also been provided to assess any potential impacts to ground water, noting the proposal does not result in any significant excavation beyond the existing ground level at the site.</p>	
DSAP		
<ul style="list-style-type: none"> • <i>DSAP provided 18 recommendations for the proposal and a number of these will require further design changes to that shown in the revised plans. It is noted that some recommendations were added or removed without significant revision to the plans, however further review and design refinements are required to achieve a better or more compliant design response. This may include discussion with TfNSW for pedestrian link and co-ordinating landscape planting with the actual restrictions that will arise from Planning for Bushfire Protection and NSW RFS.</i> ...	<p>DSAP comments are addressed in the table below.</p>	<p>Table 4 Appendix 2</p>

Table 3: Pre-DA comments and response

As demonstrated above, this application has been prepared in accordance with the direction discussed at the DA pre-lodgement meeting.

A meeting was also held with Council's Design and Sustainability Advisory Panel (DSAP) on 25 July 2024. A summary of the DSAP's comments is provided in the table below, including how the proposed design responds to these comments.

DSAP Comment	Response
Strategic context, urban context: surrounding area character	

DSAP Comment	Response
<ul style="list-style-type: none"> Consider future opportunities for block porosity and respond in terms of building alignment and access/servicing 	<ul style="list-style-type: none"> Pedestrian pathways have been proposed to enable movement through the site, connecting Warringah Road to Aquatic Drive.
Scale, built form and articulation	
<ul style="list-style-type: none"> Protect and encourage views through building to encourage sense of permeability 	<ul style="list-style-type: none"> The building has been broken up to minimise perceived bulk and scale as shown at the northern elevation.
Access, vehicular movement and car parking	
<ul style="list-style-type: none"> Consider experience and safety of pedestrians within the structure Consider Pedestrian Access from Warringah Road Consider providing a publicly accessible through-site link from Warringah Road to Aquatic Drive 	<ul style="list-style-type: none"> As above, the proposal provides for pedestrian pathways which would connect Warringah Road to Aquatic Drive.
Landscape	
<ul style="list-style-type: none"> At the next stage provide developed landscape design prepared by a suitably qualified Landscape Architect. The extent of landscape provision should be considered with a view to increasing the landscape area provided across the site. 	<ul style="list-style-type: none"> The Landscape Plans are provided at Appendix 3 and result in an overall increase to landscaping across the site. This is directly related to the demolition of areas of hardstand at the site and replacing this with areas of plantings.
<ul style="list-style-type: none"> The landscape should, as noted in presentation, focus on a low water, native/endemic with high biodiversity value. Where possible a WSUD approach should be taken across the site to increase permeability, increase tree canopy and reduce exposed/impermeable hard surfaces. 	<ul style="list-style-type: none"> The landscape scheme primarily includes native and endemic species to minimise water usage for irrigation.
<ul style="list-style-type: none"> Deep soil areas should be utilised as much as possible for the provision of significant tree plantings to increase canopy cover on the site. 	<ul style="list-style-type: none"> The proposal provides for 24% of the site as deep soil area to enable larger trees and increased canopy cover. Only 1% of landscaped area is not classified as deep soil.
<ul style="list-style-type: none"> Amenity for staff and users should be provided through an external functional space. 	<ul style="list-style-type: none"> In addition to the breakout space at Ground Floor, adjacent to the entry lobby, a communal breakout space has

DSAP Comment	Response
	<p>been provided at the north-western corner of Level 2.</p> <ul style="list-style-type: none">This particular location was requested by Council to soften the encroachment into the Main Road setback.
Amenity	
<ul style="list-style-type: none">Increase access to natural light and air flow to lower levels of building	<ul style="list-style-type: none">As above, the façade has been broken up at the northern elevation which will enable better solar access and air flow.
<ul style="list-style-type: none">Provide comfortable and clearly identifiable amenities for staff. These could include, communal dining/kitchen, end of trip, communal deck/garden/lounge area	<ul style="list-style-type: none">End of trip facilities, including showers, bathrooms and lockers, have been provided at Ground Floor adjacent to the entrance lobby.As above, outdoor spaces have also been provided at Ground Floor adjacent to the entry lobby and at Level 2 at the north-western corner.
Façade treatment/Aesthetics	
<ul style="list-style-type: none">Building expression, materiality to be developed such that a more honest and essential character	<ul style="list-style-type: none">The selected material palette reflects the surrounding character of the Business Park and reflects colours and finishes typical of a contemporary industrial building.
<ul style="list-style-type: none">Explore re-use of elements/fabric from existing structures on site	
Sustainability	
<ul style="list-style-type: none">Ensure Capacity for more EV charging points that the 4 proposed, so that there is the ability to add more in the future	<ul style="list-style-type: none">5% of car parking spaces can be provided with EV charging stations.
<ul style="list-style-type: none">Investigate ways to re-use the demolished materials on site	<ul style="list-style-type: none">The accompanying Waste Management Plan details the reuse of materials during the construction phase (Appendix 13).
<ul style="list-style-type: none">Include bike parking and EOT facilities	<ul style="list-style-type: none">As above, End of Trip facilities have been provided at Ground Floor. Bike parking is adjacent to the entry lobby.
<ul style="list-style-type: none">Select light colour materials and/or provide vegetation to shade hard surfaces to reduce heat island effect	<ul style="list-style-type: none">The selected material palette utilises lighter colours to reduce heat island effect.
<ul style="list-style-type: none">Consider a green roof under the PV. The combination provides longevity to the	<ul style="list-style-type: none">Consideration was given to a green roof, however given the nature of the development, was not pursued due to the

DSAP Comment	Response
roofing materials as well as improves the efficiency of the PV	maintenance required to ensure its longevity. The proposed roofing consists of light coloured Colorbond metal roofing.

Table 4: DSAP comments and response

2 The site and locality

2.1 Site description

The site is located at 14 Aquatic Drive, Frenchs Forest, within the Northern Beaches Local Government Area (LGA). It is legally described as Lot 102 in DP 1211755.

The site has an area of 15,460m².

It is irregular in shape and has primary street frontage to Aquatic Drive and secondary frontage to Warringah Road, noting the allotment is a battle-axe lot.

The location of the site is shown at Figure 1.



Figure 1: Site location (Base source: Nearmap)

The site is currently occupied by the Forestridge Business Park which provides for a mix of warehousing and commercial uses with associated hardstand car park. The site adjoins a 269m² triangular shaped lot at the Warringah Road frontage which is owned by Transport for NSW.

2.2 Surrounding locality

The site is located within the Frenchs Forest Business Park which extends approximately one km to the east and 100m to the west. The locality is characterised by a variety of uses, including commercial, light industrial, and other similar land uses to that proposed surrounding the site.

The site is immediately bound by the following land uses:

- Warringah Aquatic Centre, open space and bushland to the south;
- Wakehurst Parkway is located to the west of the business park, with low density residential dwellings located beyond the Parkway;

- Warringah Road is immediately to the north, with a mix of commercial, warehouse and residential uses beyond; and
- low density residential dwellings are located further east of the business park.

There are no known heritage items in proximity to the site. The nearest heritage item is approximately 500m south-west of the site, being a dwelling house at 100 Bantry Bay Road, which is of local heritage significance. The Manly Warringah War Memorial Park Conservation Area is located approximately 380m south of the site and is significant for its Aboriginal and European heritage, being a State-listed heritage item.



Figure 2: Surrounding locality (Base source: Nearmap)

2.3 Site history

Previous DAs/approvals for the subject site are as shown in the table below.

Subject site DA	DA summary	Decision
DA2017/0026	Tree Application for tree removal	Approved 23/01/2017
DA2017/0460	Business identification signage	Approved 04/08/2017
DA2017/0967	Change of Use - Use of premises as a recreation facility (indoor) ancillary to the existing premises	Approved 10/11/2017

Table 5: Previous development applications and approvals

3 The proposal

The proposed development is described in the table below:

	Comments
Description	Self-storage units and warehouse units
Ownership	Goodman
Local government area	Northern Beaches
Zoning	SP4 Enterprise
Permissibility	Self-storage units and warehouse or distribution centres are permissible with consent in the SP4 zone under the WLEP 2011
Project elements	<p>The proposed development comprises</p> <ul style="list-style-type: none"> • Demolition of existing building and structures on the site <p>153 self-storage units at ground floor and Level 1; 72 warehouse units on Levels 1 and 2; 123 car parking spaces across all levels;</p> <ul style="list-style-type: none"> • outdoor breakout spaces for staff at ground floor and Level 2; • shared lobby across all levels; • landscaping; and • associated infrastructure/servicing works

Table 6: Project overview

The DA seeks consent for demolition of an existing building, excavation works and the construction of a mixed-use development for 153 self-storage units and 72 warehouse units.

Warehouse units

The proposal includes 72 warehouse units, with 33 units on Level 1 and 39 units on Level 2. All warehouses are equipped with a loading zone and a mezzanine level with varying areas, as shown below in Table 7. The mezzanine level provides for administrative, office-like space for each warehouse unit.

Feature	Minimum Area/Dimensions	Maximum Area/Dimensions
Warehouse area	49m ²	99m ²
Loading dock dimensions	3.5m x 4.0m	3.5m x 8.8m
Mezzanine area	28m ²	52m ²

Table 7: Industrial unit sizing

Each level has been designed to provide circulation space widths which enables trucks to pass in both directions and for vehicles to enter and leave in a forward direction. The warehouses will be operated 24 hours a day, 7 days a week.

Level 2 is exclusively dedicated to warehouse units as shown in Figure 4, while Level 1 provides some space for self-storage units as shown in Figure 3.

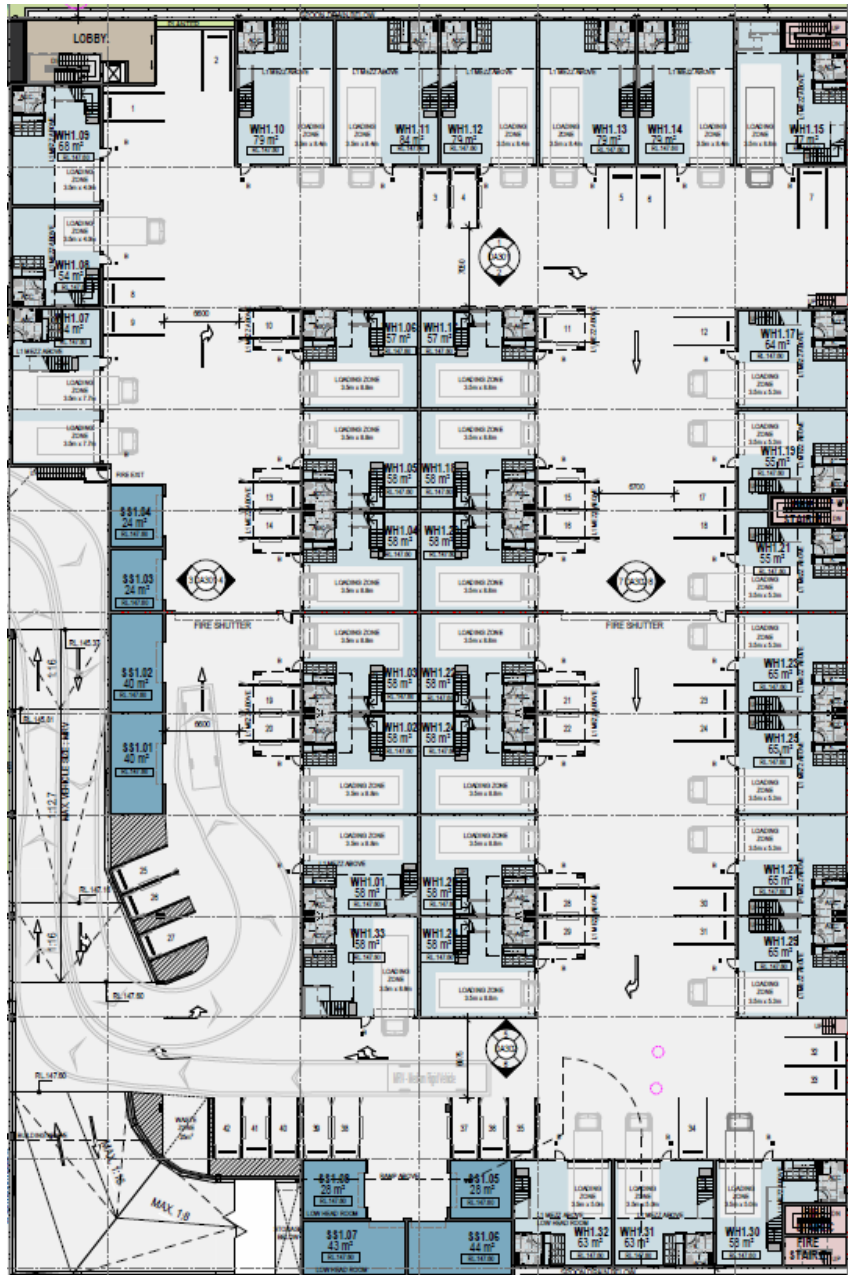


Figure 3: Level 1 Floor Plan (Source: SBA Architects)

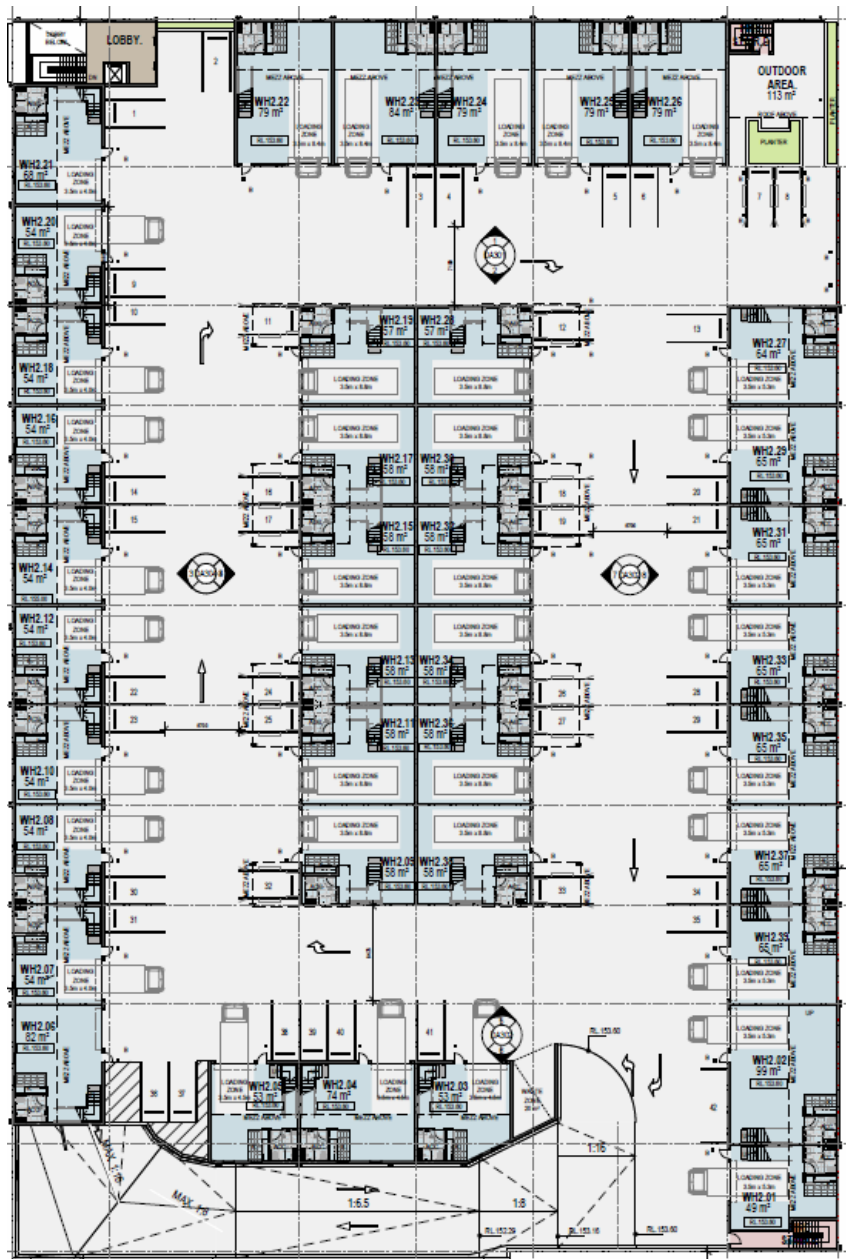


Figure 4: Level 2 Floor Plan (Source: SBA Architects)

Self-storage units

A total of 153 self-storage units are proposed with 145 self-storage units at ground floor and an additional 8 self-storage units at Level 1. The self-storage units range in size from 20m² to 64m². The units are serviced by two services areas and a wash bay which are provided at ground floor. It is proposed to strata subdivide the self-storage units.

The storage units are arranged to provide sufficient space for vehicles to pass in each direction. The self-storage units will be accessible 24 hours a day, 7 days a week.

The ground floor plan is provided in Figure 5 below, noting the entire ground floor is limited to self-storage unit uses. The circulation spaces for vehicles is generally one way with the exception of the entry point to ground floor at the south-western corner.



Figure 5: Ground floor plan showing self-storage units and relevant vehicular circulation (Source: SBA Architects)

Landscaping

The proposal includes approximately 3,815m² (25% of site area) of hard and soft landscaping at ground level, in addition to some smaller planters within the outdoor area at Level 2. Approximately 24% of the site will be provided as deep soil area.

The proposed landscape design prioritises the retention of high value, mature trees that contribute to the urban cooling, biodiversity and native habitat of the site. The proposal only requires the removal of 18 trees within the site to facilitate the development, noting it currently hosts 115 trees. As shown in the accompanying Landscape Plans at Appendix 3, the proposal seeks to maintain the existing landscaped areas within the northern setback to the development given the biodiversity values at the site whilst making improvements to and providing additional trees throughout the site.

The additional planting of tree canopies will contribute to the greening of the facility. The proposal comprises 10% of the site area as canopy cover (approximately 1,546m²).

The planting employs a native, endemic approach to species selection to support the local ecosystem.

An excerpt of the proposed overall landscaping plan is shown in Figure 6.

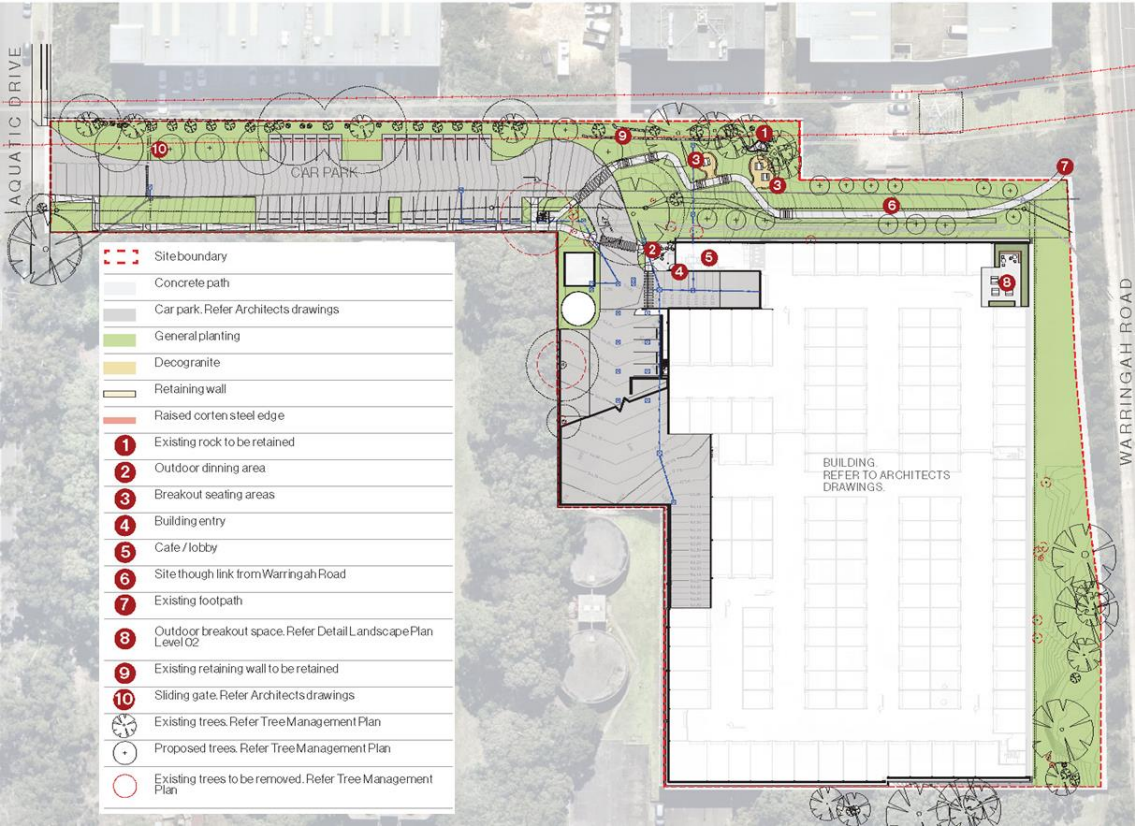


Figure 6: Overall Landscape Plan (Source: Place Design Group)

4 Strategic planning context

4.1 Greater Sydney Region Plan

The *Greater Sydney Region Plan* (Region Plan) outlines how Greater Sydney will manage growth and change in the context of social, economic and environmental matters. It sets the vision and strategy for Greater Sydney, to be implemented at a local level through District Plans. The overriding vision for Greater Sydney in the Region Plan is to rebalance Sydney into a metropolis of 3 unique but connected cities:

- the established Eastern Harbour City
- the developing Central River City
- the emerging Western Parkland City

Historically, Greater Sydney's jobs and transport have been focused to the east, requiring many people to make long journeys to and from work and other services. The 3 cities vision allows opportunities and resources to be shared more equitably while enhancing the local character we value in our communities. By integrating land use, transport links and infrastructure across the three cities, more people will have access within 30 minutes to jobs, schools, hospitals and services.

The Region Plan provides broad Priorities and Actions which focus on the following 4 key themes:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

There are a number of Directions and Objectives that are of particular relevance to the Proposal, which are addressed below:

Direction/Objective	Proposal
A city supported by infrastructure	
1. Infrastructure supports the three cities	<ul style="list-style-type: none">• The site is located on existing industrial lands and will be expanding on the existing infrastructure and is nearby Warringah Road, connecting the infrastructure to surrounding neighbourhoods.
3. Infrastructure adapts to meet future needs	<ul style="list-style-type: none">• The development will be adaptable for a variety of warehouse and freight-based uses. It is also highly accessible via major recently improved road networks.
4. Infrastructure use is optimised	<ul style="list-style-type: none">• The site is co-located in an area with other similar land uses, being in an SP4 zone.
A city for people	

Direction/Objective	Proposal
7. Communities are healthy, resilient and socially connected	<ul style="list-style-type: none"> • The business park in which the site is located is strategically placed to be a central business area for people living and working on the Northern Beaches. • The site is approximately a 12 minute walk from the nearest 160X bus stop on Frenchs Forest Road West, adjacent to Northern Beaches Hospital,, which connects the precinct to both Dee Why and Chatswood. • Bus stops within closer proximity include: <ul style="list-style-type: none"> ○ Aquatic Drive opposite Maddison Way, connecting the site to Allambie Heights and Manly through the 142 bus route, and; ○ Wakehurst Parkway after Warringah Road, which provides a link between Austlink and Manly through the 141 bus route.
A well-connected city	
14. A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	<ul style="list-style-type: none"> • The development will contribute to the 30-minute city by redeveloping a site to have multiple permissible land uses within a business park, which enhances to employment opportunities and warehousing needs of the area.
15. The Eastern, GOP and Western Economic Corridors are better connected and more competitive	<ul style="list-style-type: none"> • Whilst not located within any of these corridors, the site is located nearby the nationally significant Macquarie Park to Sydney Airport corridor, which allows the development to contribute the efficiency of the corridor.
16. Freight and logistics network is competitive and efficient	<ul style="list-style-type: none"> • The proposal aligns with the strategic objectives by providing warehousing land uses without having a significant impact on the existing surrounding road network.
Jobs and skills for the city	
22. Investment and business activity in centres	<ul style="list-style-type: none"> • The proposal contributes to both investment and increasing business activity within Frenchs Forest, which is identified as a strategic centre in the Region and District Plans.
23. Industrial and urban services land is planned, retained and managed	<ul style="list-style-type: none"> • The development will retain and improve the quality of the facilities for industrial land uses.

Direction/Objective	Proposal
A city in its landscape	
27. Biodiversity is protected, urban bushland and remnant vegetation is enhanced	<ul style="list-style-type: none">As shown in the accompanying Landscape Plans at Appendix 3, the proposed landscape setback to the northern boundary maintains all existing vegetation, noting a portion of this is identified on Biodiversity Values mapping.The proposal will not have any impact on any Biodiversity Values land within the site.The proposal will also increase the overall tree canopy at the site.
30. Urban tree canopy cover is increased	
An efficient city	
33. A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change	<ul style="list-style-type: none">A Sustainability Management Plan (SMP) has been prepared by SLR Consulting and provided at Appendix 12 which details how the proposal implements Ecologically Sustainable Development (ESD).A Waste Management Plan (WMP) is also provided at Appendix 13 which demonstrates how waste minimisation is implemented into the proposed development.
34. Energy and water flows are captured, used and re-used	
35. More waste is re-used and recycled to support the development of a circular economy	
A resilient city	
36. People and places adapt to climate change and future shocks and stresses	An SMP has been prepared by SLR Consulting and provided at Appendix 12 which details how the proposal implements Ecologically Sustainable Development (ESD).
38. Heatwaves and extreme heat are managed	

Table 8: Greater Sydney Region Plan Directions and Objectives

4.2 North District Plan

The North District Plan (District Plan) was prepared by the Greater Sydney Commission in March 2018. It seeks to manage growth in the context of economic, social and environmental matters, and provides the district level framework to implement the goals and directions outlined in the Region Plan for the North District.

The proposed development is consistent with the District Plan as it aligns with:

Planning Priority No.	Proposal
Infrastructure and collaboration	
1 Planning for a city supported by infrastructure	The proposal is aligning growth with existing major infrastructure by being in the surrounding area of Northern Beaches Hospital and on a site that has good access

Planning Priority No.	Proposal
	to the regional road network. The Utilities Report at Appendix 16 confirms the site is can be readily connected to all essential services.
2 Working through collaboration	The proposal is located nearby the Frenchs Forest Planned Precinct, specifically in an area mapped to be for job creation.
Liveability	
5 Providing housing supply, choice and affordability, with access to jobs, services and public transport	The proposed development will contribute to additional employment opportunities in a location accessible to nearby residential areas.
Productivity	
9 Growing and investing in health and education precincts	The proposal provides additional investment for contemporary self-storage and warehousing uses and additional employment opportunities nearby the Frenchs Forest health and education precinct, which will assist to diversify job opportunities closer to homes.
10 Growing investment, business opportunities and jobs in strategic centres	The proposal will grow investment, business opportunities and jobs in the Frenchs Forest strategic centre.
11 Retaining and managing industrial and urban services land	The proposal aims to retain the land for a permissible use within the SP4 zone within Frenchs Forest. It is noted that the SP4 Enterprise zone allows for a variety of commercial and industrial uses.
12 Delivering integrated land use and transport planning a 30-minute city	The proposal aims to improve access to self storage and warehouse facilities and local employment opportunities in the Northern Beaches LGA.
Sustainability	
16 Protecting and enhancing bushland and biodiversity	<p>As shown in the accompanying Landscape Plans at Appendix 3, the proposed landscape setback to the northern boundary maintains all existing vegetation, noting a portion of this is identified on Biodiversity Values mapping.</p> <p>The proposal will also increase the overall tree canopy at the site.</p>

Planning Priority No.	Proposal
21 Reducing carbon emissions and managing energy, water and waste efficiently	An SMP has been prepared by SLR Consulting and provided at Appendix 12 which details how the proposal implements ESD.
22 Adapting to the impacts of urban and natural hazards and climate change	A Bushfire Hazard Assessment Report has been prepared to support this application and confirms the proposal will not have any adverse bushfire impacts.

Table 9: Assessment of proposal against North District Plan

4.3 Northern Beaches Local Strategic Planning Statement

The Northern Beaches Local Strategic Planning Statement (LSPS) was finalised and published on the NSW Planning Portal in March 2020. The LSPS is a 20-year plan which sets out the Council's land use vision and planning priorities for its LGA.

The proposal is consistent with the LSPS in particular the following priorities:

- *Priority 2 Protected and enhanced bushland and biodiversity:*
- *Priority 5: Greener urban environments*
- *Priority 7: A low-carbon community with high energy, water and waste efficiency*
- *Priority 8: Adapted to the impacts of natural and urban Hazards and climate change:*
- *Priority 9: Infrastructure delivered with employment and housing growth: The proposal will provide jobs in a precinct that is strategically located in a precinct with a new world-class piece of infrastructure and connected to some of the Northern Beaches' largest residential populations.*
- *Priority 22: Jobs that match the skills and needs of the community: The proposal is located in an identified area of job growth to serve the community, being part of the business park in Frenchs Forest.*
- *Priority 23: Frenchs Forest as a sustainable health and education precinct: The proposal represents an investment in the Frenchs Forest Business Park. Boosting the business park and connecting it to the Frenchs Forest Town Centre is an identified action.*
- *Priority 28: Safeguard employment lands: The proposal retains and improves on current employment lands.*

4.4 Northern Beaches Community Strategic Plan

Council's Community Strategic Plan (NBCSP) sets out its vision and priorities for the LGA. It has a broader focus than the LSPS as it addresses long term social, environmental and economic goals for the community.

The proposal is consistent with the NBCSP as it will:

- Provide for additional investment within the Frenchs Forest Business Park that employment lands are retained by redeveloping an industrial building to improve the site.
- Provide jobs locally that will help to reduce commute times

5 Statutory planning framework

5.1 Environmental Planning and Assessment Act 1979

5.1.1 Objects of the Act

The proposal is consistent with the objects of the EP& Act as it is considered to promote the orderly and economic use and development of land without resulting in an adverse impact on the environment. Detailed assessment against the objects of the EP&A Act is provided below.

Objects of the Act	Comment
a. to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources	The proposal is consistent with this object as it will provide for additional economic activity and employment opportunities on a site zoned for such uses, without any adverse impacts on the environment
b. to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment	This SEE provides information on the relevant economic, environmental and social impacts of the proposed development to enable the consent authority to undertake a thorough environmental assessment and assist in its decision-making on the application.
c. to promote the orderly and economic use and development of land	The development promotes the orderly and economic use of the land by providing self-storage units and a warehouse or distribution centre in an SP4 Enterprise zone, which will support business activity and employment within the zone.
d. to promote the delivery and maintenance of affordable housing	Not applicable.
e. to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats	As shown in the accompanying Landscape Plans at Appendix 3, the proposed landscape setback to the northern boundary maintains all existing vegetation, noting a portion of this is identified on Biodiversity Values mapping. The proposal will also increase the overall landscaping and tree canopy at the site.

Objects of the Act	Comment
f. to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)	There are no heritage items or conservation areas nearby the site, and there are no predicted impacts to European or Aboriginal cultural heritage. Should the DA be approved, it is anticipated that the conditions will include a stop work requirement should any archaeological items be encountered during construction.
g. to promote good design and amenity of the built environment	The building is of a high quality design and has been designed to ensure a cohesive built form outcome with surrounding developments and the natural environment. It utilises materials and finishes with low emissions, low reflectivity, and of a palette which respects the mixed use nature of the zone and Business Park.
h. to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants	The development will be constructed in line with any conditions of consent issued by the consent authority and the relevant requirements that relate to health and safety, construction and maintenance.
i. to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State	The proposal will be assessed by the Northern Beaches Council, however given it meets the definition of RSD, will be determined by the Sydney North Planning Panel.
j. to provide increased opportunity for community participation in environmental planning and assessment.	The proposal will be notified in accordance with the Council's notification policy. Council officers will consider any submissions received prior to the determination of the application.

Table 10: Objects of the *Environmental Planning and Assessment Act 1979*

5.1.2 Section 4.15 Matters for Consideration

This section of the report provides the planning assessment against the key statutory environmental planning instruments (EPIs) and development control plans (DCPs) relevant to the proposal. The following detailed assessment of the proposal is provided and which is based on the heads of consideration contained in section 4.15 of the EP&A Act.

Provision	Consideration
a. the provisions of	
i) any environmental planning instrument	The relevant EPIs are addressed within this section (Section 5).
ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the	The Draft Northern Beaches Consolidated LEP is addressed at Section 5.7.

Provision	Consideration
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)	
iii) any development control plan	The Warringah Development Control Plan 2011 (WDCP) is addressed at Section 5.7.
(a) 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	There are no known planning agreements relevant to the proposal.
iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The requirements of the EP&A Regulations are addressed at Section 5.10.
v) Repealed	N/A
b. The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	The impacts of the proposal are addressed in Section 6.
c. the suitability of the site for the development	Site suitability is addressed at Section 6.10.
d. any submissions made in accordance with this Act or the regulations	Any submissions made on this subject development application will be duly considered and addressed by the applicant. In addition, Council will consider any public submissions relating to the proposal during its assessment.
e. the public interest.	Public interest is addressed at Section 6.13

Table 11: Section 4.15(1) assessment

5.2 Rural Fires Act 1997

The site is identified as bushfire prone land. A Bushfire Hazard Assessment (BHA) has been prepared and is provided at Appendix 11 accordingly. The BHA confirms that the proposal has been appropriately designed to withstand any impacts in the circumstances of a bushfire.

Notwithstanding, the proposal does not comprise a 'special fire protection purpose' as defined under Section 100B of the *Rural Fires Act 1997* and therefore, is not integrated development under section 4.46(1) of the EP&A Act.

5.3 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* aims to maintain the diversity and quality of ecosystems and enhance their capacity to adapt to change and provide for the needs of future generations.

As shown in the figure below, limited portions of the site are identified as containing 'Biodiversity Values' land.



Figure 7: Biodiversity Values land mapping with site outlined dashed yellow (Source: NSW Planning Portal)

As noted elsewhere in this report, the biodiversity value land at the northern boundary is to be maintained as detailed in the accompanying Landscape Plans at Appendix 3. No tree removal or planting is proposed within the northern landscaped setback.

The remainder of the site that contains Biodiversity Value land is generally limited to existing hardstand areas which are proposed to be replaced by new areas of hardstand under this proposal. There are some low value trees within these areas that are proposed for removal, however as detailed in the Arborist Report at Appendix 10, these do not contribute to the ecological values of the site and do not form part of the Duffy Forest Ecological Community.

Accordingly, there will be no significant impacts on areas identified as containing Biodiversity Values within the site.

5.4 Contaminated Land Management Act 1997

The *Contaminated Land Management Act 1997* establishes a process for investigating and (where appropriate) remediating land where contamination poses a significant risk of harm to human health or the environment.

A DSI has been prepared to investigate the contamination status of the site and is provided at Appendix 7. The DSI found:

"...the contamination risk to human health and ecological receptors at the Site is considered to be low, as there is no complete source-pathway-receptor linkage and soil and groundwater CoPC were below adopted IL criteria for human health and although above for groundwater ecological ILs, it is not considered to pose a risk to receptors based on absence of identified impact in the soil results and likelihood of concentrations representing background levels in the sandstone and urban environment.

Given that impacts have not been identified that pose a significant risk, a RAP or LTEMP are not considered required for future development of the Site. Based on the available data, the results from the investigation indicate that the subsurface material would have an indicative waste classification of GSW, if off-site disposal is required."

The DSI further concludes that the site can be made readily suitable for the proposal and a Construction Environmental Management Plan (CEMP) should be prepared prior to construction to ensure minimal impacts in the case that contaminated materials are located at the site. It is considered that a condition of consent can be imposed requiring the preparation of a CEMP prior to the issuing of a Construction Certificate.

5.5 State Environmental Planning Policies

The proposal has been designed with regard to the objectives and standards of the relevant planning instruments and policies that apply to the site. Under the provisions of the EP&A Act, the key applicable state environmental planning policies (SEPPs) are:

- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*

The application of the above plans and policies is discussed in detail below.

5.5.1 State Environmental Planning Policy (Biodiversity and Conservation) 2021

The *State Environmental Planning Policy (Biodiversity and Conservation) 2021* seeks to value, protect, conserve and manage the innate value and external benefits of NSW's natural environment and heritage. An assessment of the relevant provisions is detailed below:

Chapter	Discussion
2. Vegetation in non-rural areas	Chapter 2 applies to the Northern Beaches LGA.

Chapter	Discussion
	Section 2.6 requires that Council must give a permit for the clearing of any vegetation in a non-rural area. This application requires the removal of 18 trees to facilitate the development. Accordingly, this will require the consent of Council.

Table 12: SEPP (Biodiversity and Conservation) 2021 - relevant provisions

5.5.2 State Environmental Planning Policy (Planning Systems) 2021

The *State Environmental Planning Policy (Planning Systems) 2021* seeks to achieve an effective planning system that looks to the future, led by long term, evidence-based strategic planning that is inclusive, democratic, responsive to climate change and injects predictability into decision-making. An assessment of the relevant provisions is detailed below:

Chapter	Discussion
2. State and regional development	<p>Chapter 2 aims to identify development that is State significant development, State significant infrastructure, critical State significant infrastructure and RSD</p> <p>The development meets the RSD criteria of Schedule 6, Clause 2 of Chapter 2 as it is development that has an estimated development cost (EDC) of more than \$30 million.</p> <p>As the development meets the criteria of Chapter 2, the application will be determined by the Sydney North Planning Panel.</p> <p>Additionally, as detailed in Section 1.2, the proposal does not meet the State Significant Development criteria under Section 12 <i>Warehouse or distribution centres</i> of Schedule 1 of <i>State Environmental Planning Policy (Planning Systems) 2021</i>, as:</p> <ul style="list-style-type: none"> the warehouse units are to be strata subdivided and therefore are not “related to the same operation”; and the cost associated with the warehousing aspect of the development is below \$50 million as broken down in the Estimated Development Cost Report at Appendix 1.

Table 13: SEPP (Planning Systems) 2021 - relevant provisions

5.5.3 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* seeks to reduce risk and build resilience in the face of natural hazards as well as development-related hazards. An assessment of the relevant provisions is detailed below:

Chapter	Discussion
4. Remediation of land	<p>Chapter 4 applies to the State where a development application is made concerning land that is contaminated. The consent authority must not grant consent unless:</p> <ol style="list-style-type: none"> it has considered whether the land is contaminated, and 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 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. <p>A DSI has been prepared (Appendix 7) and finds that the site is considered suitable for the proposed land use and a CEMP should be prepared prior to construction to ensure impacts are minimised should contaminated material be found during construction.</p>

Table 14: SEPP (Resilience and Hazards) 2021 relevant provisions

5.5.4 State Environmental Planning Policy (Sustainable Buildings) 2022

The *State Environmental Planning Policy (Sustainable Building) 2022* encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials.

Sustainability commitments and objectives have been incorporated into the design of the proposed development to achieve a high level of energy efficiency and sustainability. The development is committed to achieving compliance with all the NCC 2019 Section J requirements.

Specific design elements have been integrated in the development to ensure the building embodies best practice sustainable design. These include:

- *A PV solar system of at least 285 kW has been proposed;*
- *Solar Hot water systems or heat pump implemented in staff amenities, including toilets, lunchrooms and cleaners rooms;*
- *2 W/ m² maximum illumination density for the warehouses instead of 4 W/m² as per Table J6.2a of the NCC 2022 Volume One resulting in a considerable energy reduction;*
- *Daylight-controlled LED lighting for the warehouse instead of metal halide, resulting in a considerable energy reduction and reduced maintenance;*
- *Motion sensors to all LED lights within the warehouse and offices;*
- *Translucent roof sheeting to warehouse areas;*
- *R3.7 total roof insulation for the air-conditioned office areas;*
- *R2.8 total external wall insulation for the air-conditioned office areas;*

- *High performance glazing to all air-conditioned areas or minimum NCC requirements;*
- *Passive solar design for external outdoor areas;*
- *Efficient air conditioning system;*
- *Air-conditioning control zoning is recommended where necessary to cater for varying occupancy rates, orientation to solar loads, etc. Also, a time clock is provided with provision for after-hours override;*
- *Power sub-metering to enable continued review of power consumption for the offices and warehouse;*
- *Selection of endemic and low-maintenance landscaping species;*
- *60 kL rainwater tanks for rainwater harvesting and re-use for landscape irrigation and toilet flushing;*
- *Low flow fixtures and fittings, including at least 4-star taps and shower heads;*
- *Low VOC paints, carpet, and sealant for all offices;*
- *5% of total parking spaces are dedicated for electrical cars with charging stations;*
- *More than 90% of the predicted construction waste arising from the development will be reused; and*
- *Motorbike parking.*

An SMP has been prepared at Appendix 12, which includes a Sustainability Strategy with specific initiatives and further addresses sustainability. A discussion is also provided at Section 6.8 of this report. An Embodied Emissions Form has also been provided at Appendix 18 to demonstrate that the proposal implements the use of sustainable materials to reduce its carbon footprint.

5.5.5 State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* seeks to guide the provision of well-designed and located infrastructure including transport. An assessment of the relevant provisions is detailed below:

Chapter	Discussion
2. Infrastructure	Chapter 2 aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, providing greater flexibility in the location of infrastructure and service facilities, allowing development of surplus government owned land, identifying environmental assessment categories and matters to be considered in assessments, and providing for consultation with relevant public authorities.
2.119 Classified road	Section 2.119 stipulates that the consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that vehicular access to the land is provided by a road other than the classified road and the safety, efficiency and ongoing operation of the classified road will not be adversely affected.

Chapter	Discussion
	The development fronts Warringah Road, which is a classified State road. The proposal maintains the existing access from Aquatic Drive and therefore does not seek to provide any access via Warringah Road.
2.122 Traffic generating development	<p>Section 2.122 requires that DAs for certain traffic generating development, as set out in Schedule 3 of the policy, be referred to Transport for NSW and that any response/submission from it be considered prior to the determination of the application.</p> <p>The proposal seeks approval for warehouse and distribution purposes which are identified as traffic generating development under Schedule 3 if the site area is greater than 8,000m². The site area is 15,460m². An assessment of the key traffic impacts is at Section 6.4.</p>

Table 15: SEPP (Transport and Infrastructure) 2021 – relevant provisions

5.6 Warringah Local Environmental Plan 2011

The *Warringah Local Environmental Plan 2011* is the principal EPI applicable to the land. It aims to establish planning principles and development controls that will promote the orderly and economic use of land.

5.6.1 Zoning

Under the LEP, the site is zoned SP4 Enterprise (Figure 4). The objectives of the zone are:

- *To provide for development and land uses that support enterprise and productivity.*
- *To provide healthy, attractive, functional and safe business areas.*
- *To minimise conflict between land uses in the zone and adjoining zones and ensure the amenity of adjoining or nearby residential land uses.*
- *To create business environments of high visual quality that relate favourably in architectural and landscape treatment to neighbouring land uses and to the natural environment.*
- *To provide a range of facilities and services, light industries, warehouses and offices.*
- *To provide opportunities for new and emerging light industries.*
- *To restrict retail uses to ensure sufficient land is available for industrial and light industrial uses to meet future demands.*

It is assessed that the proposed warehouse and distribution centre use and self-storage premises is consistent with the zone objectives as:

- it provides for compatible land uses which support productivity within the Business Park;
- it minimises land use conflict given the proposed uses are wholly permissible within the zone;
- it provides for a contemporary warehouse style building that is compatible with the neighbouring and surrounding built form character; and

- it provides for both warehousing and self-storage uses, contributing to the varying uses within the zone.

Self-storage units and warehouse or distribution centres are both permissible with consent in the SP4 Enterprise zone.

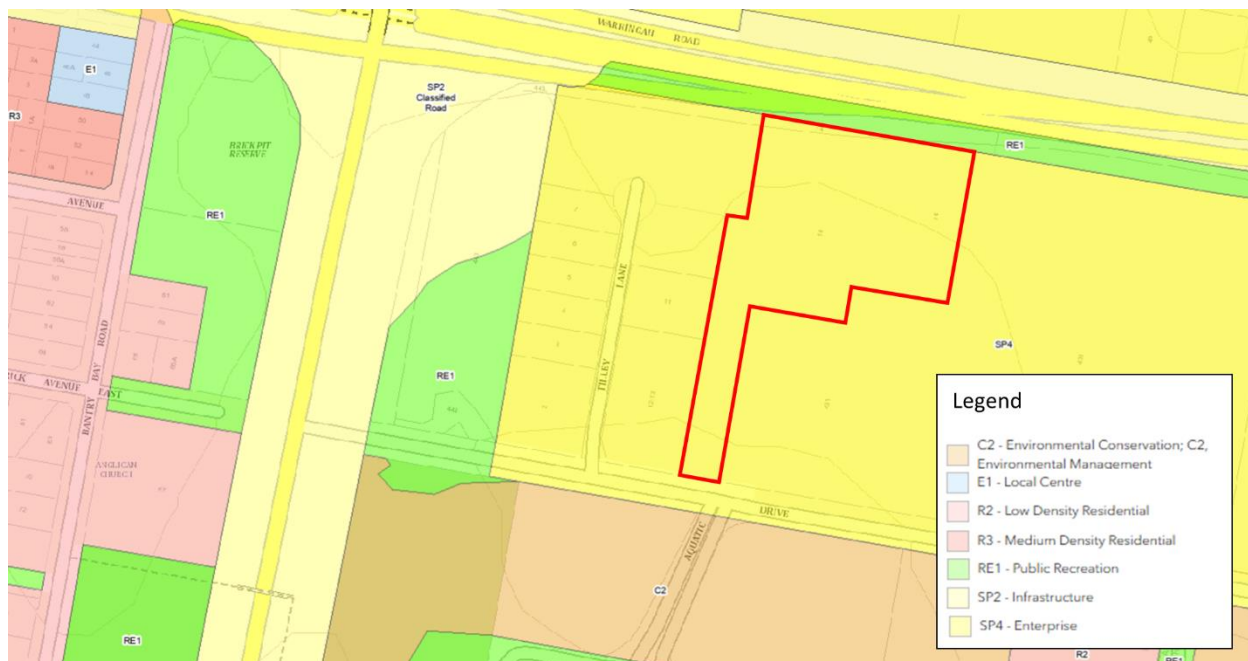


Figure 8: Site zoning (Base source: Espatial Viewer)

5.6.2 Floor space ratio

There is no applicable maximum floor space ratio (FSR) applicable to the site pursuant to clause 4.4 of the WLEP 2011.

5.6.3 Height

There is no applicable maximum building height applicable to the site pursuant to clause 4.3 of the WLEP 2011.

5.6.4 Heritage

The site is not mapped as a heritage item, nor within a heritage conservation area. The nearest heritage item is located approximately 500m west south west of the site. It is not anticipated that there would be any adverse impacts to any heritage items as a result of the development.

5.6.5 Other matters

Relevant clause	Comment	Compliance
Clause 4.1 Minimum lot size - 4000 m ²	<ul style="list-style-type: none"> • The existing lot size is 15,460 m². 	N/A

Relevant clause	Comment	Compliance
	<ul style="list-style-type: none"> No subdivision is proposed. 	
Clause 5.21 Flood planning	<ul style="list-style-type: none"> The site is not identified on any Council Flood maps. 	N/A
Clause 6.1 Acid sulfate soils	<ul style="list-style-type: none"> The site is not identified as containing any acid sulfate soils. 	N/A
Clause 6.4 Development on sloping land	<ul style="list-style-type: none"> The site is identified within: <ul style="list-style-type: none"> Area A - Slope less than 5 degrees; and Area B - Franking slopes from 5 to 25 degrees A Geotechnical Investigation has been undertaken and is provided at Appendix 6. The investigation demonstrates that the site is suitable for the proposed development with minor earthworks required. 	Yes

Table 16: Other matters

5.7 Warringah Development Control Plan 2011

The proposal is generally in compliance with the aims, objectives and key provisions of the WDCP 2011. Any departures from the DCP controls are well justified as detailed in this SEE.

A detailed assessment of the proposal against the relevant provisions is provided at Appendix 19.

5.8 Draft Northern Beaches Consolidated Local Environmental Plan

It is noted that Council resolved to submit the Planning Proposal for the new, consolidated Northern Beaches LEP to the Minister for Planning and Public Spaces for 'Gateway Determination' at its meeting on 17 June 2024.

Under the draft LEP, new controls are proposed for the Frenchs Forest Business Park. This includes a new height development standard of 11m and an increased height provision of 21m for 'employment generating development'.

Given the proposed warehouse and distribution centre uses, the proposal is an 'employment generating development' and therefore eligible for the 21m height provision. As shown on the Architectural Plans at Attachment 2, the proposed building height of 17.53 m will not exceed 21m and therefore complies with the draft provision

5.9 Contributions

The *Northern Beaches Section 7.12 Contributions Plan 2024* applies to the site. Northern Beaches Council will impose any contributions required as part of any development consent issued.

5.10 Environmental Planning and Assessment Regulations 2021

There are no known matters prescribed by the *Environmental Planning and Assessment Regulations 2021* that are relevant to the consideration of this application. The proposal will be compliant with the National Construction Code.

6 Environmental planning assessment

Section 4.15(1)(b) of the EP&A Act requires an assessment of the impact of development on environmental impacts (natural and built), and social and economic impacts.

6.1 Built form and layout

The proposed building has a maximum ridgeline height of 17.53 m (excluding sheeting) with a pitched roof sloping down to the northern and southern side of the building. The building includes a variety of high quality materials and finishes are proposed, utilising a neutral palette of colours. These elements include precast concrete panels, stainless steel downpipes and eaves gutters, Colorbond surfmist metal roof and translucent roof sheeting, and pre-cast concrete and glazing to ensure the proposal blends with the surrounding landscape. A full legend of the external finishes is provided in the Architectural Plans in Appendix 2.



Figure 9: Photomontage of proposal as viewed from Warringah Road to the north (Source: SBA Architects)

The proposed 17.53m building height is generally consistent with surrounding built form and sits lower than the existing building, noting the parapet of the existing building is 3m above the proposed roof ridge. The proposed new building height therefore has minimal impact on the locality and is compatible with the surrounding built form character.

The proposed development comprises a three-storey building comprising 153 self-storage units and 72 warehouse units. The building will feature a shared lobby access, and fire stairwells across all levels, with car parking and hardstand in front of the warehouse and storage units on the levels L1 and L2, with additional parking located at ground level along the battle-axe driveway. The warehouses and storage units have been designed to be modular to provide GFA flexibly within the building, depending on the needs of the future tenants.



Figure 10: Photomontage of building as viewed from south-western corner at entry lobby (Source: SBA Architects)

The proposed building is rectangular in shape, with the individual self-storage and warehouse units designed in a rectangular form around the internal circulation spaces. The integration of the lobby component across all levels at the south-western corner into the built form provides for variation and building articulation. Fire stairwells are located along the northern side of the building, along with service rooms on the north eastern and western corners of the ground floor.

6.2 Landscaping and trees

The proposed landscape scheme incorporates the planting of native trees, shrubs, grasses and groundcovers to provide screening of hardstand and built form. It ensures landscape setbacks will be densely vegetated, consistent with landscaping throughout the Business Park. The design also includes a breakout space on Level 2 at the north-western corner which is provided with a large area of plantings with an outdoor dining area in front of the main entrance to the industrial building with associated seating. The breakout spaces and associated landscaping are shown in Figure 11, Figure 12 and Figure 13.



Figure 11: Photomontage of north-western corner of building showing breakout space at Level 2 and associated planters (Source: SBA Architects)

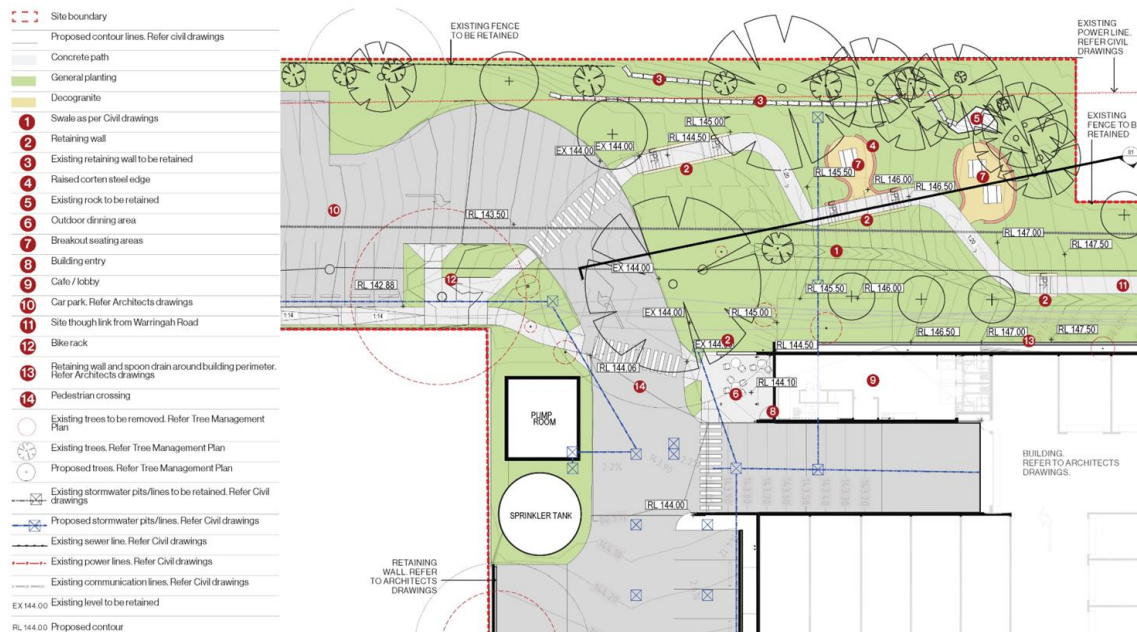


Figure 12: Ground floor landscaping scheme showing breakout space adjacent to main entry lobby (Source: Place Design Group)

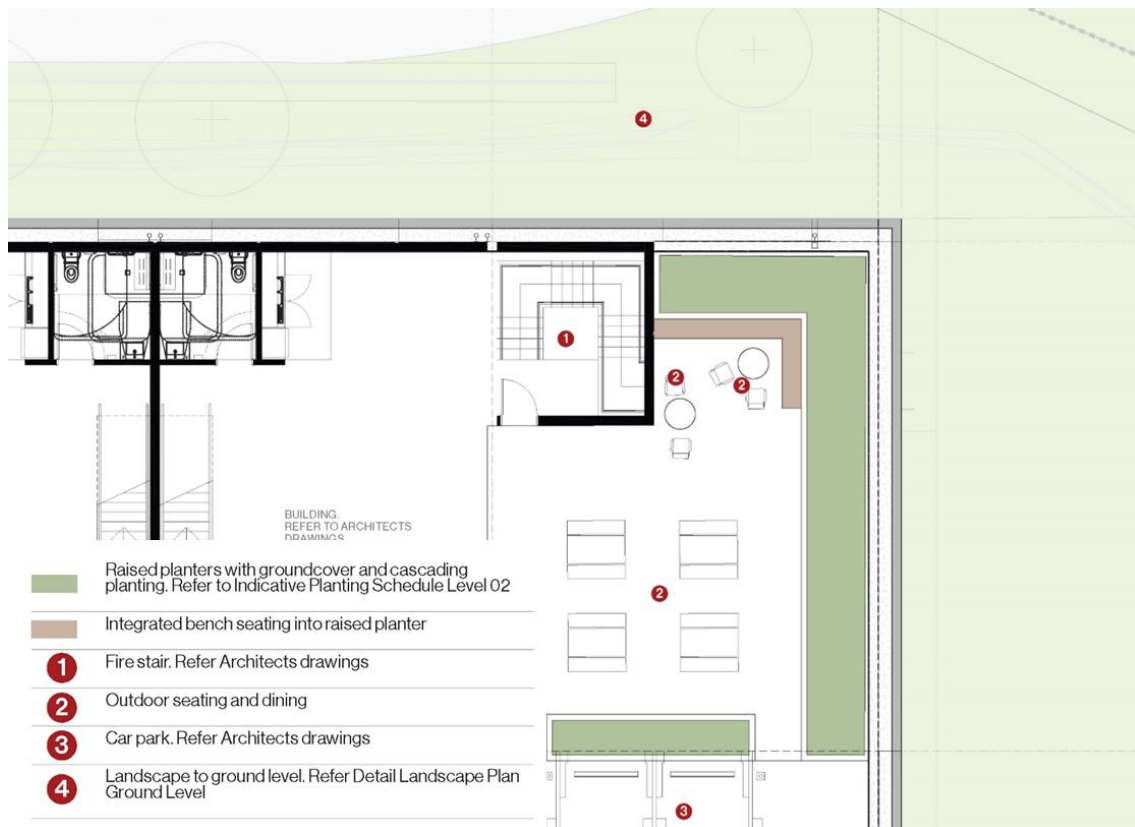


Figure 13: Breakout space provided at the north-eastern corner of Level 2 (Source: Place Design Group)

A portion of the site in the north eastern corner and along the southern boundary contain areas which are classified as containing 'Biodiversity Values'. The proposed landscaping design has been designed in order to minimise the impact of the proposed development on these areas, with existing vegetation to the north east corner being retained. A portion of the site at the entry to the site along the battle-axe and in the north western corner is also classified as bushfire prone land (Vegetation buffer). No new landscaped elements are proposed within these areas of the site to ensure no changes to the bushfire risk at the site. Further information on how the proposed industrial building responds to the bushfire hazards is included in the Bushfire Hazard Assessment in Appendix 11 and discussed at Section 6.7.

Arboriculture

An Arboricultural Impact Assessment (AIA) was prepared by Civica and is attached at Appendix 10. The report details the impacts of the development on the 115 trees on the property that may be affected by the development.

To accommodate the proposed development, 18 trees would have to be removed, of which two trees are Category A high retention value, and 16 are Category C low retention value.

The AIA recommends the following tree protection and management measures:

- Tree 116, which is identified for retention (circled red in below figure) has proposed underground cable infrastructure demolition works within its western Tree Protection Zone (TPZ), it is proposed that the existing cable remains to minimise the potential for root damage during excavation works.
- If excavation works are to exceed 10% of the TPZ, it is to be carried out under arborist supervision and/or with consent of the project arborist.

- Any proposed excavation should start at the outer extent of the TPZ and move inwards to minimise root damages. Excavation should also be undertaken using root sensitive techniques.
- All significant roots are to be preserved/protected from desiccation, recorded, photographed and reported to the project arborist for review. At the discretion of the project arborist they may decide that retention of such roots is required for the sake of future tree health or may determine such roots can be pruned without any significant impact on future health

In addition to the implementation of the above measures, the following generic protection and reporting measures will be implemented during the demolition and construction stages of the development:

- Activities are to be restricted within the TPZ
- Protective fencing
- Trunk and ground protection
- Tree protection signage
- Involvement from the project arborist
- Project milestones
- Compliance reporting

The figure below identifies all trees within the site with icon colour indicating the tree's current risk rating as detailed in the AIA.



Figure 14: Site map showing all retained trees requiring generic/specific (red circle) protection measures (Source: ArborSite)

6.3 Civil and Stormwater

A Civil Report (CR) and Civil Plans (CP) have been prepared by Costin Roe Consulting which describes the flood planning requirements and stormwater design for the proposed development and is provided at Appendix 4 and 5.

All stormwater drainage and associated infrastructure has been designed in accordance with:

- Northern Beaches Council WSUD & MUSIC Modelling Guidelines 2016
- Warringah DCP 2011
- AS 3500.3 National Plumbing and Drainage Code Part 3 - Stormwater Drainage

A piped stormwater drainage system has been designed to accommodate the 20 year ARI storm event, this system satisfies Council's requirements. Meanwhile, overland flow paths will be provided to cater for storms up to and including the 100-year ARI storm event, which will limit property damage and risk to the public in the event of a piped system failure. The stormwater

management system also includes multiple water quality improvement devices to treat the runoff water before entering into the stormwater pipeline.

Due to elevation constraints on the site, there is a bypass area within the southern portion of the site where water will not enter the on-site detention and will instead be directed to the council stormwater system within Aquatic Drive. To compensate the bypass, the OSD tank has been appropriately sized and engineered. The below map identifies the bypass catchment.



Figure 15: Stormwater catchments (Source: Costin Roe Consulting)

A number of mitigations measures have been implemented to minimise the impacts to stormwater from the development:

- The project has a civil engineering strategy in place with best-practice solutions for the site considering its constraints.
- A stormwater quality management strategy has been designed to reduce the effects and quantities of pollutants leaving the site
- A Sediment and Erosion Control plan will be implemented throughout the construction phase of the project.
- A treatment train incorporating Stormwater Treatment Measures will be applied during the operational phase of the development. The measures have been designed using the results of MUSIC modelling (Model for Urban Stormwater Improvement Conceptualisation).

The CR indicates that the development has the capability to comply with the relevant stormwater controls of Council and that the proposed management strategies are recommended to be incorporated in future detailed designs. It is also noted that the proposed stormwater management system will not impact on any existing Council easements or infrastructure.

6.4 Traffic and transport

A Transport Assessment (TA) has been prepared by Ason Group and is attached at Appendix 8. The TA evaluates the impacts that the proposed development will have on the existing surrounding road network by analysing the impact that construction and operation will have on road function.

Traffic Impact

The proposed development will result in a reduction of GFA from that existing at the site by 5,044m², from 16,871m² to 11,798m². As a result, this will reduce the overall traffic impact that the site has on the surrounding road network, also noting the proposed warehouse and self-storage unit uses have a lesser impact on traffic generation than the existing office uses. Table 17 and Table 18 below detail traffic generation relative to GFA and net impacts.

	Land Use	GFA (m ²)	AM (veh/hr)	PM (veh/hr)	Daily (veh/day)
Proposed	Self-Storage	4,520	9	9	96
	Warehouse	4,910	25	25	196
	Mezzanine (office)	2,397	41	29	271
	Total	11,827	75	63	563

Table 17: Traffic generation - proposed yield (Source: Ason Group)

	Overall GFA (m ²)	AM (veh/hr)	PM (veh/hr)	Daily (veh/hr)
Existing	16,871	242	177	1,640
Proposed	11,827	75	63	563
Net change (proposed - existing)	-5,044	-167	-114	-1,077

Table 18: Traffic generation - existing vs proposed (Source: Ason Group)

As noted above, the development would result in a net reduction of trips during both the AM and PM peaks, by 167 and 114 vehicles per hour respectively. Therefore, the proposal is deemed by the TA to not have any material impact on the traffic function of the surrounding road network.

Heavy vehicle routes

As seen in the map below, 25/26m B-double trucks are not approved to travel along the southern portion of Wakehurst Road and on Aquatic Drive. The largest vehicles expected to have access to the site are 12.5m medium heavy rigid vehicles. Should the site be accessed by a 26m B-double truck, an application to the National Heavy Vehicle Regulator will be required.

It is noted that the maximum vehicle weight at the intersection between Aquatic Drive and Allambie Road is 3 tonnes.



Figure 16: Approved heavy vehicle map (Source: Ason Group)

Public and active transport

The site is considered to have adequate access to public transport, being located within 400m of bus stops at:

- Aquatic Drive opposite Maddison Way, connecting the site to Allambie Heights and Manly through the 142 bus route, and;
- Wakehurst Parkway after Warringah Road, which provides a link between Austlink and Manly through the 141 bus route.

The site is surrounded by an extensive pedestrian and cycling network, with paths along both sides of the road at Aquatic Drive, Allambie Road and Frenchs Forest Road, which connects the site to the bus links. There are also signalised crossings along Wakehurst Parkway at the intersections with both Warringah Road and Frenchs Forest Road.

Existing and proposed cycling networks are shown in the below map:

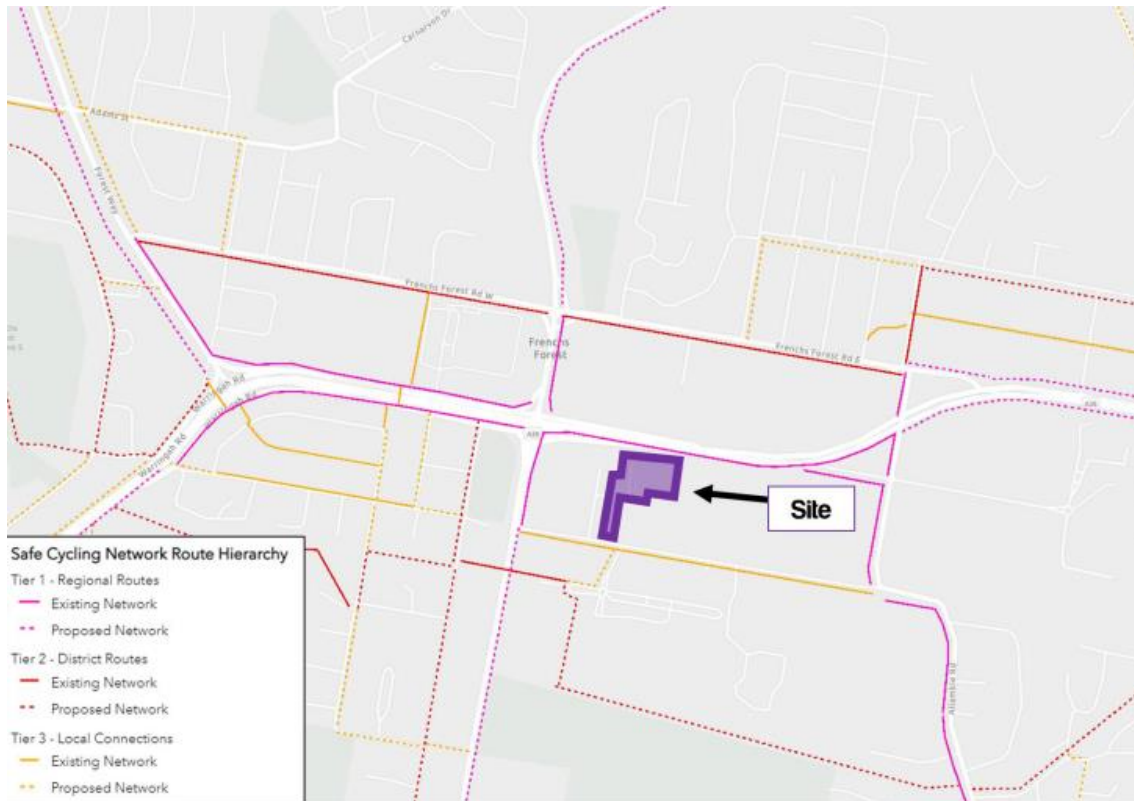


Figure 17: Safe cycling network route hierarchy (Source: Ason Group)

Parking

The proposed development includes 123 car parking spaces across all levels of the development. The car parking areas will be located across three locations within the site:

- along the battle-axe driveway of the site between the building and Aquatic Drive;
- on Level 1 adjacent to the proposed strata storage/ warehouse/ mezzanine units in which the parking spaces serve; and
- on Level 2 adjacent to the proposed warehouse/ mezzanine units in which the parking spaces serve.

The number of car parking spaces for the self-storage units has been provided in accordance with the *Parking and Traffic Study – Supporting the self-storage industry of Australia and New Zealand* as described in the TA by Ason Group (Appendix 8). Similarly, car parking spaces for the warehouse units have been provided in accordance with the Warringah DCP requirements.

The scheme also includes 2 accessible car parking spaces to meet relevant Australian Standards and the requirements of the Warringah DCP.

The proposed development includes a total of 8 bicycle parking spaces which is in excess of the 6 spaces recommended in the TA.

End of trip facilities

End of trip facilities are to be provided in accordance with the provisions in the Warringah DCP 2011:

- a minimum of one shower cubicle per seven (7) required bicycle parking spaces
- provided at the rate of one clothes locker for every required bicycle parking space.

As such, the development is proposing 2 shower cubicles and 8 lockers adjacent to the main lobby entrance, meeting the requirements of the DCP.

6.5 Noise and vibration

A Noise Impact Assessment (NIA) has been prepared by SLR Consulting and is attached at Appendix 9. The NIA addresses the potential construction and operational noise impacts associated with the development against the relevant guidelines

The NIA concludes that construction and operational noise impacts are expected to comply with the noise controls. However, construction noise levels are predicted to exceed the standards to some of the nearest sensitive receivers during the noisier construction practices. To mitigate the impacts, the NIA suggests the following measures:

- limit construction hours to daytime;
- using quieter equipment which emits less vibrations where feasible and reasonable;
- implement a noise monitoring audit program to manage noise levels;
- consider noise levels before renting plant equipment; and
- plan the worksite to locate noisy activities away from receivers, and organise the timing of noise emitting machines.

Other mitigation measures recommended to be applied for operational noise levels:

- optimise site layout to minimise noise emissions from the site;
- use ambient sensing alarms on trucks and forklifts when operating at night;
- appropriate design of warehouse, particularly through material selection, to reduce noise; and
- roller doors kept closed while loading or unloading within the warehouse.

It is noted that the nature of the proposed development for small scale warehouse units and self-storage units are not anticipated to generate extensive noise during operation.

Notwithstanding, all above recommendations are to be implemented during the construction and operational phases of the development, where relevant.

6.6 Contamination

A Stage 2 DSI (Appendix 7) was prepared by Aecom as a follow-up to their original PSI undertaken in 2022. The document has been prepared to assess the potential presence of soil and/or groundwater contamination which could affect the site's suitability for the proposed commercial and industrial land uses.

The DSI found that the site is considered suitable for the proposed land use, specifically:

- photo-ionisation detector readings of all soil samples were 0.0 parts per million;

- there was no evidence of contamination of suspected asbestos observed throughout the site;
- the results of the DSI concluded that the site has a low risk of impacts to human health and ecological receptors through contamination; and
- no remediation action plan of long-term environmental management plan is required.

The DSI recommends that a CEMP is to be developed with an Unexpected Finds Protocol and a Fill Importation Protocol if significant importation of material is required. A Remedial Action Plan (RAP) is not warranted by the proposal as the site is readily suitable for the proposed development.

6.7 Bushfire

The Bushfire Hazard Assessment, prepared by Blackash Bushfire Consulting (Appendix 14), outlines a number of recommendations to be implemented throughout the construction and operation stages of the development to ensure safety in the scenario of a bushfire. These recommendations include:

- *Construction to apply with the following relevant controls on a prescriptive and/or performance basis:*
 - *National Construction Code (2019)*
 - *Australian Standard AS 3959:2018*
 - *Construction of buildings in bush fire-prone areas and/or NASH Standard (1.7.14 updated)*
 - *National Standard Steel Framed Construction in Bushfire Areas - 2014*
 - *Section 7.5 of Planning for Bush Fire Protection 2019*
- *Fire hydrants are to be provided in accordance with Building Code of Australia E1.3, AS2419.1:2005.*
- *The entire site is to remain as an Inner Protection Area in accordance with Appendix 4 for the PBP 2019 and NSW RFS "Asset Protection zone standards."*

The Bushfire Hazard Assessment concludes that the proposal is compliant with the aims, objectives and requirements of the Rural Fire Service's *Planning for Bush Fire Protection 2019*.

6.8 Sustainability management

An SMP prepared by SLR Consulting is provided at Appendix 12. The primary objective of the SMP is to identify all the potential energy savings that could be realised during the operational phase of the development. The minimum standards for a building's sustainability measures are outlined in Section J of the National Construction Code (NCC). The proposed warehouse is anticipated to achieve a 136.4% reduction in energy consumption compared to the 2022 NCC Reference Building, through the implementation of a range of strategies. These strategies include, but are not limited to, the following:

- *A PV solar system of at least 285 kW has been proposed.*
 - *The proposed 285 kW PV solar system will offset approximately 395.3 MWh/year of energy usage*
 - *The estimated greenhouse gas CO₂ emission saving is approximately 324,131 kgCO₂/annum*

- *Solar Hot water systems or heat pump implemented in staff amenities, including toilets, lunchrooms and cleaners rooms;*
- *2 W/m² maximum illumination density for the warehouses instead of 4 W/m² as per Table J6.2a of the NCC 2022 Volume One resulting in a considerable energy reduction;*
- *Daylight-controlled LED lighting for the warehouse instead of metal halide, resulting in a considerable energy reduction and reduced maintenance;*
- *Motion sensors to all LED lights within the warehouse and offices;*
- *Translucent roof sheeting to warehouse areas;*
- *R3.7 total roof insulation for the air-conditioned office areas;*
- *R2.8 total external wall insulation for the air-conditioned office areas;*
- *High performance glazing to all air-conditioned areas or minimum NCC requirements;*
- *Passive solar design for external outdoor areas;*
- *Efficient air conditioning system;*
- *Air-conditioning control zoning is recommended where necessary to cater for varying occupancy rates, orientation to solar loads, etc. Also, a time clock is provided with provision for after-hours override;*
- *Power sub-metering to enable continued review of power consumption for the offices and warehouse;*
- *Selection of endemic and low-maintenance landscaping species;*
- *60 kL rainwater tanks for rainwater harvesting and re-use for landscape irrigation and toilet flushing;*
- *Low flow fixtures and fittings, including at least 4-star taps and shower heads;*
- *Low VOC paints, carpet, and sealant for all offices;*
- *5% of total parking spaces are dedicated for electrical cars with charging stations;*
- *More than 90% of the predicted construction waste arising from the development will be reused; and*
- *Motorbike parking.*

It is considered that with the abovementioned implementation of strategies, the proposal displays best practice sustainability initiatives and achieves the objectives of ESD principles.

Further, an Embodied Emissions Form has been completed and is provided at Appendix 18. The Form demonstrates that the proposal utilises materials which reduce its' overall carbon footprint and ensure sustainable development.

6.9 Waste management

The proposal ensures that waste management occurs in a safe and orderly manner. Waste is to be recycled and disposed of in accordance with the objectives of the *Waste Avoidance and Resource Recovery Act 2001*.

A Waste Management Plan (WMP) has been prepared by SLR Consulting and included at Appendix 13 of this report. This plan identifies all potential waste likely to be generated at the site during the construction and operational phases, including a description of how waste would be handled, processed and disposed of, or re-used or recycled, in accordance with Council's requirements.

The WMP includes a comprehensive waste management methodology for the varying waste types expected at the site. The WMP effectively addresses construction and operational waste generated by the proposal as requested by Council at the pre lodgement meeting and will be implemented during each phase as relevant.

6.10 Building Code of Australia

A Building Code of Australia (BCA) and Accessibility Assessment has been prepared by Blackett Maguire + Goldsmith and is included at Appendix 14. The report provides an assessment of the current design proposal for the development against the Deemed-to-Satisfy Provisions of the BCA.

The report identifies key compliance issues which will require further resolution, which is to be done through fire engineered performance solutions or plan amendments prior to the construction certificate stage. The BCA Assessment concludes that the proposed development can readily achieve compliance with the BCA subject to the resolution of the identified matters.

Additionally, a Fire Safety Strategy (FSS) has been prepared and is provided at Appendix 17. The FSS supports the BCA Assessment noting it addresses the fire engineering principles that will be utilised in ensuring that the prescriptive non-compliances with the Deemed-to-Satisfy (DtS) provisions of the BCA are resolved through a fire engineered Performance Solution to conform to the building regulations.

The FSS outlines the performance solutions proposed by the development to achieve compliance with the relevant building regulations and notes that further fire-engineering analysis will be undertaken at the Construction Certificate phase to ensure the development ensures fire safety.

6.11 Suitability of the site

The characteristics of the site, its land use context and its location are described in Section 2 of this report. The site is suitable in accommodating the proposed redevelopment for the following reasons:

- the land is zoned for a mix of commercial and industrial purposes, which the proposal seeks to improve and enhance
- there are multiple constructed and approved warehouses in the locality and the proposal is entirely consistent with the prevailing land uses
- adequate separation and mitigation measures have been provided for surrounding sensitive land uses noting that the site is located adjacent to Warringah Road. Existing vegetation between the proposed building and Warringah Road is to be retained which will assist in screening the development from road users.

Accordingly, it can be concluded that the site/premises is entirely suitable to accommodate the nature and scale of the proposal.

6.12 Submissions

The proposal will be notified in accordance with the Council's notification policy. Council officers will consider any submissions received prior to the determination of the application.

6.13 Public interest

The proposal is in the public interest as it will achieve:

- the proposal protects, retains and enhances employment lands;
- the proposal will support and enhance economic viability of French Forest through providing employment opportunities within the Northern Beaches LGA;
- the proposal provides for varying self-storage and warehouse unit sizes to support business needs and flexibility; and
- the proposal incorporates appropriate environmentally sustainable outcomes consistent with ESD principles.

In addition, Council will consider any public submissions relating to the proposal during its assessment. Accordingly, it can be concluded that the proposed development is entirely in the public interest.

7 Conclusion

This SEE supports a development application for a self-storage unit and warehousing unit development at 14 Aquatic Drive, Frenchs Forest.

This SEE has been prepared and is submitted to Council pursuant to the provisions of Part 4 of the EP&A Act. A detailed examination of the proposal, in its legislative and physical context, has found that it:

- is consistent with the current legislative framework
- is consistent with the relevant strategic documents
- is suitable for the site and the area, after an assessment against the heads of consideration of section 4.15(1) of the EP&A Act
- is consistent with the future Consolidated Northern Beaches LEP (as it is currently proposed)
- meets the objectives of the SP4 zone in the Northern Beaches Local Environmental Plan
- does not give rise to any adverse impacts on nearby heritage items
- will not lead to any adverse traffic or pedestrian safety issues
- will not result in any environmental impacts or adverse impacts on the amenity of surrounding land.

Consequently, approval of this development application is recommended.

Appendix 1: Estimated Development Cost

Appendix 2: Architectural Plans

Appendix 3: Landscape Plans

Appendix 4: Civil Plans

Appendix 5: Civil Report

Appendix 6: Geotechnical Investigation

Appendix 7: Detailed Site Investigation

Appendix 8: Transport Assessment

Appendix 9: Noise Impact Assessment

Appendix 10: Arborist Report

Appendix 11: Bushfire Hazard Assessment

Appendix 12: Sustainability Management Plan

Appendix 13: Waste Management Plan

Appendix 14: BCA & Accessibility Assessment Report

Appendix 15: Survey Plan

Appendix 16: Infield Utilities Report

Appendix 17: Fire Safety Strategy

Appendix 18: Embodied Emissions Form

Appendix 19: Warringah DCP 2011 Assessment