

# **Statement of Environmental Effects**

For:	Northern Beaches Council
Site:	No. 158B & 158 C McCarrs Creek Road, CHURCH POINT
Date:	21 <sup>st</sup> October 2024
Our Ref:	8859BC
Report	
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# 1. PROPOSAL

The primary focus of this project is the construction of waterfront facilities in front of 158B McCarrs Creek Road, Church Point, to be jointly shared with 158B & 158C McCarrs Creek Road. These facilities include a shared timber jetty, a shared transition jetty, shared ramp, shared pontoon, berthing areas, and piles.

# 2. THE SITE

The site is located on the eastern shore of Mc Carrs Creek just to the south of Browns Bay (Figure 1) and faces Ku-Ring-Gai Chase National Park. Access to the site is via Mc Carrs Creek from the Pittwater Waterway or the adjoining freehold land.



Figure 1 - Locality - maps.six.nsw.gov.au

There are currently no existing waterfront structures existing below the Mean High Water (MHW) boundary.

The freehold properties slope steeply from the waterfront for the first third, then gradually for the second third and steeply to Mc Carrs Creek Road. The property is moderately vegetated with various trees and shrubs, and have erected buildings and structures typically associated with residential and No158C is currently vacant. No.158C has access to the waterfront via a right of footway 1.22wide over No.158A.



The freehold properties exhibit a distinct topography, descending sharply from the waterfront in the initial third, transitioning to a gradual slope in the subsequent third, and concluding with another steep descent towards Mc Carrs Creek Road. The property boasts moderate vegetation, featuring an array of trees and shrubs, while accommodating residential buildings and structures. Notably, No.158C, currently vacant, with waterfront access through a 1.22m wide right of footway over No.158A McCarrs Creek Road.

H2O Consulting Group Pty Ltd undertook a Marine Habitat Survey and found two main aquatic habitats at the site. Firstly, the intertidal habitat in the Study Area comprises natural soft sandy shores, rock boulders, rock platforms, and manmade structures like the lower sandstone blocks of the jetty, stairs, and existing piers. It supports various invertebrate species, including False Limpets and Striped Conniwinks in the high intertidal zone. In the mid intertidal zone on the lower sections of the jetty, Sydney Rock Oysters dominate, along with occasional Mulberry Whelks, B. nanum, and C. tramoserica. These species are also present in similar communities on rock boulders and lower jetty piles in the low intertidal zone. No intertidal vegetation, such as mangroves or seagrasses, was observed in the Study Area.

Secondly, the subtidal habitat in the surveyed area is characterised by a gently sloping seabed comprised of silty soft sediment, with occasional rock boulders situated close to the shoreline. Additionally, there is manmade habitat provided by lower piles associated with the existing jetty.

In the shallower areas, this habitat features sparse populations of Sydney Rock Oysters and a layer of green algae. Moving into deeper regions beyond the jetty, where the depth ranges from -0.5 to -4.5 meters, the seabed shifts to silty soft sediment with intermittent detritus. Notably, this location displays signs of extensive bioturbation, indicating a substantial presence of polychaetes and crustaceans. It's important to mention that no seagrass was observed within the Study Area.

Throughout the survey, no fish species were observed. However, it is likely that the Subject Site hosts common fish species at different times, including Yellowfin Bream, Luderick, Yellow-finned Leatherjacket, Silver Biddy, Australian Sawtail, Sea Mullet, and Tailor.

An invasive species, the green alga Caulerpa taxifolia, was identified in a high-density bed located on the silty soft sediment along the western boundary of the Study Area. Refer to the Marine Habitat Survey report for further details regarding the above.

Neighbouring properties have similar water recreation structures, including jetties, ramps, pontoons, mooring pens with piles, boatsheds, decks, walkways, seawalls, reclamations and skid ramps.



# 3. ZONING AND PLANNING COMPLIANCE

# 3.1 PITTWATER LOCAL ENVIRONMENT PLAN 2014 (PLEP 2014)

The proposed shared water recreation structures are design in Council's W1 Natural Waterways Zones, adjacent to the E4 Environmental Living area for the freehold land (Figure 2). These structures align with zoning rules, allowed with consent in both E4 and W1 zones. Specifically, within zone W1 and within an Area 23 for additional permitted uses (Figure 3). Given this zoning compliance the proposal is permissible with consent.



Figure 2 - Land Zoning Map - Sheet LZN\_011



Figure 3 - Additional Permitted Uses Map - 6370\_COM\_APU\_011



The applicable sections of the PLEP relating to the proposal are as follows:

- (i) Foreshore building line.
  - The shared timber jetty, a shared walkway, shared ramp, shared pontoon, berthing areas, and supporting piles are situated below the Mean High Water (MHW) boundary and are positioned outside the designated Foreshore Area, as specified in Foreshore Building Line Map-FBL\_011 and the regulations outlined in section 7.8(5) of PLEP 2014.
- (ii) Height of buildings (PLEP 4.3)
  - The Height of Building Map HOB\_011 specifies a maximum building height of 8.5 meters for structures located on freehold land above the MHW boundary and 4 meters for those on Crown Land below the MHW boundary. It's important to note that the proposal is situated below the MHW boundary, designed at 1.5 meters Above Australian Height Datum (AHD), with the top of piles at 2.65 meters AHD. Consequently, the proposal comfortably complies with the 4-meter AHD height limit, rendering the Height of the Building regulation irrelevant in this context.
- (iii) Development below Mean High Water Mark (PLEP 5.7)
  - See sections 3.2 (xi)
- (iv) Heritage Conservation (5.10)
  - According to the Heritage Map HER\_011, both the freehold land and the land below the Mean High Water (MHW) boundary are not situated within a Heritage Conservation Area. Consequently, the proposal falls outside the purview of section 5.10(2) of PLEP and does not require additional consent in this regard.

(v) Acid Sulphate Soils (PLEP 7.1)

The Acid Sulfate Soils Map (ASS\_011) designates the subject freehold land as Class 5, while the area below the Mean High Water (MHW) boundary is classified as Class 1. The proposed development, which includes a shared timber jetty, walkway, ramp, pontoon, berthing areas, and supporting piles, is situated entirely below the MHW boundary and thus falls within the Class 1 area.

In accordance with sections 7.1(2) and 7.1(6)(a & b) of the Pittwater Local Environmental Plan (PLEP), the proposal does not require specific consent for the following reasons:

- The works do not extend below 5 metres Australian Height Datum (AHD), which is a crucial regulatory threshold for consent.
- The total disturbance is less than 1 tonne of soil, remaining well below the minimum regulatory threshold.
- The proposed works will not result in any lowering of the water table, ensuring that there are no adverse impacts on the groundwater systems or surrounding environment.

A Geotechnical and Acid Sulfate Soils Assessment Report prepared by AscentGeo on 2 October 2024 confirms these findings. Field testing revealed no evidence of actual or potential acid sulfate soils at the site. The pH levels from the borehole tests were within a neutral range (pH 5.9–6.3), indicating no presence of acid sulfate soils. The report further outlines that all piles will be driven into the seafloor without the

The report further outlines that all piles will be driven into the seafloor without the need for excavation or screw piling. This method ensures that there will be no



disturbance, exposure, or drainage of acid sulfate soils, and thus no risks associated with the lowering of the water table or contamination of the surrounding marine environment.

Based on the AscentGeo report, no additional field or laboratory testing is necessary, and no Acid Sulfate Soils Management Plan is required. The proposed works comply with PLEP section 7.1, ensuring environmental protection.

- (v) Earthworks (PLEP 7.2)
  - Considering that no earthworks are intended for the proposal the regulations and considerations outlined in Section 7.2 concerning earthworks do not apply to this proposal.
- (vi) Biodiversity Protection (PLEP 7.6)
  - The freehold land and parts of the waterfront (below MHW) are noted on Councils Biodiversity Map BIO\_011. The proposal is below the MHW boundary and not within an important aquatic Biodiversity area.
  - The proposal does not require the removal of any trees.
  - A Marine Habitat Survey was undertaken by H2O Consulting Group Pty Ltd (report enclosed) and provides recommendations on how to protect the local marine habitat along with construction techniques to mitigate any potential damage that may occur during construction. The Marine Habitat Survey disclosed that the proposed facility would meet the aquatic ecological conservation requirements of the Fisheries Management Act (FMA) (1994) as contained in the DPI (2013) Fish Habitat Protection Guidelines. The project would not require any permits under the FMA as there is low risk of "harm to marine vegetation" and no activities are classified as "reclamation or dredging".
  - DPI Fisheries approved that the proposal does not include any dredging, reclamation, harm to marine vegetation, or blockage of fish passage, and therefore DPI Fisheries does not consider the proposal to constitute Integrated Development under s.91 of the Environmental Planning and Assessment Act 1979. (Approval enclosed)
  - The proposed jetty realignment, ramp, pontoon, and berthing area is not anticipated to have significant ecological consequences on the marine environment, with measures in place to minimize and mitigate potential impacts.

(vii) Geotechnical Hazard (PLEP 7.7)

- The proposed shared timber jetty, walkway, ramp, pontoon, berthing areas, and supporting piles do not involve significant earthworks or excavation activities. All piles will be driven below the Mean Low Water (MLW) mark, and thus, the development does not typically present the geotechnical hazards that would require comprehensive risk mitigation measures.
- The Geotechnical Hazard Map GTH\_011 classifies the freehold land as Geotechnical Hazard H1, while the area below the Mean High Water (MHW) boundary is classified as H1 and "unclassified." Since the proposed works are situated below the MHW boundary, and partially within an unclassified geotechnical hazard zone, a geotechnical risk assessment is not required for this development.
- The Geotechnical Assessment Report, prepared by AscentGeo on 2 October 2024, further supports this conclusion. The report highlights that the development involves minimal disturbance to the land and focuses primarily on pile installation, thereby avoiding typical geotechnical risks. This aligns with Section 7.7 of the Pittwater Local



Environmental Plan (PLEP), which generally applies to developments involving significant earthworks or excavation on geotechnically sensitive land.

 Given the nature of the proposed works, which do not involve excavation or significant changes to land conditions, the application of geotechnical hazard considerations is limited. The project's focus is primarily on structural realignment and marine environmental factors, with geotechnical risks largely mitigated by the design and construction methodology. Consequently, a comprehensive geotechnical risk assessment is not necessary.

# (vii) Limited Development on Foreshore Area (PLEP 7.8)

• The proposed shared timber jetty, a shared walkway, shared ramp, shared pontoon, berthing areas, and supporting piles are permissible under Section 7.8(2)(b) of PLEP 2014, which allows for developments such as boat sheds, sea retaining walls, wharves, jetties, and other waterway access structures in the foreshore area.

# 3.2 NORTHERN BEACHES: PITTWATER 21 DEVELOPMENT CONTROL PLAN (PDCP21) 2004 (as amended 18/01/2021)

Compliance to the relevant controls stated in PDCP21 relating to a proposal only are as follows;

(i) Heritage Conservation (B1.1) & Aboriginal Heritage Significance (B1.4) Refer to Section 3.1(iv) above.

# (ii) Landslip Hazard (B3.1)

As mentioned above, the proposal is distinguished by the absence of any significant earthworks or excavation activities, and all proposed work is seaward of the MHW boundary. All piles will be securely driven into the seafloor without excavation or screw pilling.

#### (iii) Bushfire Hazard (B3.2)

The proposal is located below the Mean High Water Mark (MHWM) and adjoin an area not classified as bushfire-prone under the Bushfire Prone Land Map (October 2020). As this area is unclassified, the bushfire protection requirements of Planning for Bushfire Protection 2006 and AS 3959:2009 do not apply, ensuring compliance with relevant planning controls without necessitating additional bushfire mitigation measures.

#### (iv) Controls Relating to the Natural Environment (B4.7, B4.15, B4.16, B4.19)

- B4.7 Pittwater Spotted Gum Forest Endangered Ecological Community Refer to Section 3.1(vii) above.
- B4.15 Saltmarsh Endangered Ecological Community Refer to Section 3.1(vii) above and The Marine Habitat Survey enclosed.
- B4.16 Seagrass Conservation & B4.19 Estuarine Habitat Refer to Section 3.1(vii) above and The Marine Habitat Survey enclosed.

#### (v) Site Works Management (B8.1 & B8.3)

B8.1 Construction and Demolition - Excavation and Landfill Refer to Section 3.1 (v), (vi) & (viii) and 3.2 (ii). The proposal work is seaward of the MHW boundary and does not involve any excavation, earthworks, or landfill operations that would have an adverse impact on

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the site or adjoining properties. As such, the requirements outlined in the Geotechnical Risk Management Policy for Pittwater, which relate to excavation, landfill, and construction near site boundaries or structures, do not apply to this project. Additionally, the proposal will not destabilise any trees or involve works on low-bearing capacity soils. A sediment barrier will be installed along the waterfront for the duration of the construction to mitigate any potential sediment runoff into the Pittwater Waterway. Refer to the Marine Habitat Survey report for construction recommendations to reduce turbidity.

B8.3 Construction and Demolition - The development will adhere to construction waste minimization practices outlined in B8.3 of PLEP 2014. These practices aim to reduce waste generated during construction by promoting the reuse of materials on-site and proper recycling at a local Resource Recovery Centre when suitable. This approach demonstrates the project's commitment to sustainable and environmentally responsible construction practices.

#### (vi) Character as viewed from a Public Place (D4.1 & D15.1)

The proposed shared timber jetty, a shared walkway, shared ramp, shared pontoon, berthing areas, and supporting piles is not dissimilar in terms of scale, general design form, textures, materials, etc., to neighbouring properties and along the entire foreshore of the Pittwater Waterway. The proposal will, therefore, not adversely impact the local character.

### (vii) Scenic Protection (D4.2 & D15.2):

The shared timber jetty, a shared walkway, shared ramp, shared pontoon, berthing areas, and supporting piles is not dissimilar in terms of scale, general design form, textures, materials, etc., to neighbouring properties and along the entire foreshore of the Pittwater Waterway. The proposal is in keeping with the local amenity.

#### (viii) Building colours and materials (D4.3 & D15.3)

The proposed shared structures will be constructed with timber. The constructed materials and colours of the proposed structures are typical and will complement similar structures throughout Pittwater.

#### (ix) Side and rear building line (D4.6 & D15.7):

The proposal aligns with the regulations regarding the Foreshore Building Line, as specified in PLEP 2014, since it is within the permissible boundaries. Notably, it is also situated below the Mean High Water (MHW) boundary, rendering the section concerning the MHW boundary inapplicable to this project.

It's essential to emphasise that the proposal doesn't disrupt the existing public access along the freehold land, as the shore component remains a natural bank. The public foreshore access in this area is tide-dependent and, given the nature of this application, there is no scope to enhance the current access between neighbouring properties. Importantly, the proposal maintains and, in some respects, improves the safety of public foreshore access between properties at 158A, 158B, and 158C.

(x) Fences (D4.11, D4.12 & D15.10):

No fencing is proposed.



# (xi) Waterfront Lighting (D15.11):

No lighting is proposed.

# (xii) Development seaward of the Mean High Water Mark (D15.12):

The proposed structures are situated below the Mean High Water (MHW) boundary within the foreshore area. These structures are in full compliance with the land zones specified in section 3.1 of the Pittwater Local Environmental Plan 2014 (PLEP) and are permitted under section 7.8(2)(b) of the PLEP.

The potential impacts of this proposal on the estuarine habitat are thoroughly documented in the Marine Habitat Survey conducted by H2O Consulting Group Pty Ltd (report enclosed). The survey not only identifies these impacts but also provides recommendations for their mitigation.

It is essential to note that public foreshore access along the frontage of the site primarily falls within the rocky intertidal zone, which is tide-dependent and not suitable for public access due to safety concerns. However, as previously outlined in section 3.2(viii), the proposal is designed to seamlessly integrate with the existing natural bank. Furthermore, the development ensures the preservation of current safe public foreshore access between neighbouring properties at 158A, 158B, and 158C, with the potential for improvements.

# (xiii) Lateral Limits (D15.13):

The proposed shared timber jetty, a shared walkway, shared ramp, shared pontoon, berthing areas, and supporting piles have been thoughtfully designed to follow the Division Of Waterways (DOW). As delineated by the DOW between No.158B and No.158A. These DOW limits have been defined by surveying and plotted in accordance with the specifications outlined in D15.13.

# (xiv) Minimum frontage for waterfront development (D15.14)

The proposed structures align with this section, as the subject lot has an approximately 23.7m frontage to Pittwater and including the right of foot way its 24.7m, meeting the criteria outlined herein.

# (xv) Waterfront development (D15.15)

The proposed structures fully comply with the dimension requirements and location specifications outlined in D15.15.

Furthermore, an in-depth underwater survey of the seabed and underwater species was conducted beneath the proposal by H2O Consulting Group Pty Ltd in June 2023. The report concludes that the proposal adheres to the aquatic ecological conservation requirements of Pittwater 21 DCP and the Fisheries Management Act. A response from the Department of Primary Industries (Fisheries), providing consent to this proposal, is also included.

Roads and Maritime Services have performed a comprehensive navigational assessment of the proposal and have determined that there are no navigational concerns associated with this proposal. Consent from Roads and Maritime Services is also enclosed.



# (xvi) Seawalls (D15.18)

No proposed seawall or changes to foreshore.

### 4. STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021 (SRH21)

The proposal is within the Coastal Environment (Division 3) and Coastal Use (Division 4) areas as outlined in SRH21. Assessment of the impacts of the proposal in accordance with Division 3 & 4 is as follows.

#### Division 3 Coastal environment area

#### Development on land within the coastal environment area

- (1) Development consent must not be granted to development on land that is within the coastal environment area unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the following:
  - a. the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,
    - The proposal has no impact the biophysical or hydrological environment. Impacts of the proposal on the local aquatic environment have been addressed in the Marine Habitat Survey report.
  - b. coastal environmental values and natural coastal processes,
    - It is not envisaged that the proposal will have any additional impacts on the existing coastal processes.
  - c. the water quality of the marine estate (within the meaning of the Marine Estate Management Act 2014), in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,
    - The proposal is not within a coastal lake. The proposal may have a short term impact on the local water quality and marine habitat, refer to Marine Habitat Survey report for details and recommendations.
  - d. marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,
    - Impacts of the proposal on local marine vegetation and habitats have been investigated, refer to Marine Habitat Survey report.
  - e. existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,
    - Safe public foreshore access within the intertidal zone is limited to along the sandy foreshore in the vicinity of the proposal. This is due to the subjects and neighbouring water recreation structures. Structures, terrain, and vegetation also limit public access upon the freehold land along this section of Church Point. The proposed shared jetty, shared ramp, shared pontoon,



and berthing areas will adjoin the existing MHW boundary, and this section of public foreshore access will remain available in its current form.

- f. Aboriginal cultural heritage, practices and places,
  - The site is not indicated on the Heritage Map HER\_011 in the PLEP therefore it is envisaged that no Aboriginal cultural heritage, practices and places will be impacted by this proposal. It should be noted however that if during construction any Aboriginal objects are found, they will be preserved, and further advice sought to protect the items.
- g. the use of the surf zone.
  - Not applicable to this proposal
- (2) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that:
  - (a) the development is designed, sited and will be managed to avoid an adverse impact referred to in subclause (1), or
  - (b) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or
  - (c) if that impact cannot be minimised—the development will be managed to mitigate that impact.
    - The proposal has no adverse environmental, cultural or public impacts. It has been designed and sited to avoid adverse impacts referred to in subclause (1) above. Similar waterfront structures are common throughout Pittwater which can achieve acceptable environmental, cultural and public outcomes therefore it is not unreasonable to expect similar outcomes from this proposal.

# Division 4 Coastal use area

# Development on land within the coastal use area

- (1) Development consent must not be granted to development on land that is within the coastal use area unless the consent authority:
- (a) has considered whether the proposed development is likely to cause an adverse impact on the following:
  - (i) existing, safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,
    - Safe public foreshore access within the intertidal zone is primarily limited to the sandy rocky foreshore area near the proposal. The presence of neighbouring water recreation structures, as well as the local terrain and vegetation, further restrict public access along the freehold land in the Church Point area.
    - It's important to note that the proposal will be integrated in the existing natural bank. As a result, this specific section of public foreshore access will continue to be available in its current configuration, ensuring that public access is maintained and improved as required by the regulations.



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- (ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,
  - No public place nearby will be affected by view loss with this proposal. It is not envisaged that the proposal will create any additional wind funnelling if any exists at all. The proposal will shade the areas of the intertidal zone and seafloor directly beneath them. The impacts of the shadowing have been considered and addressed in the Marine Habitat Survey, the design and the construction material.
- (iii) the visual amenity and scenic qualities of the coast, including coastal headlands,
  - The proposal will not create any additional unreasonable impacts in terms of appearance, it is in keeping with the nautical character of Pittwater and will complement the surrounding facilities.
- (iv) Aboriginal cultural heritage, practices and places,
  - The site is not indicated on the Heritage Map HER\_011 in the PLEP therefore it is envisaged that no Aboriginal cultural heritage, practices and places will be impacted by this proposal. It should be noted however that if during construction any Aboriginal objects are found, they will be preserved, and further advice sought to protect the items.
- (v) cultural and built environment heritage, and
  - No cultural or built heritage exists at the subject site and therefore are not impacted upon by this proposal.
- (b) is satisfied that:
  - (i) the development is designed, sited and will be managed to avoid an adverse impact referred to in paragraph (a), or
  - (ii) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or
  - (iii) if that impact cannot be minimised—the development will be managed to mitigate that impact, and
    - The proposal has no adverse impacts on public access, views, scenic quality or aboriginal, cultural or built heritage. The proposed structures will be consistent with water recreation structures not only locally but also throughout Pittwater.
- (c) has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development.
  - The proposed structures are not dissimilar in terms of scale, general design form, textures, materials etc., to neighbouring properties and along the entire foreshore of the Pittwater Waterway. The proposal is in keeping with the nautical character of the Pittwater and will complement the surrounding facilities.

# 5. COASTAL MANAGEMENT ACT 2016 (CMA16)

In accordance with Section 27 of CMA16 the proposal is permissible with consent. Clause 27 is as follows;



Development consent must not be granted under the Environmental Planning and Assessment Act 1979 to development for the purpose of coastal protection works, unless the consent authority is satisfied that:

- (a) the works will not, over the life of the works:
  - (i) unreasonably limit or be likely to unreasonably limit public access to or the use of a beach or headland, or
  - (ii) pose or be likely to pose a threat to public safety, and
- (b) satisfactory arrangements have been made (by conditions imposed on the consent) for the following for the life of the works:
  - (i) the restoration of a beach, or land adjacent to the beach, if any increased erosion of the beach or adjacent land is caused by the presence of the works,
  - (ii) the maintenance of the works.

For Section 27(a), the works will not unreasonably limit public access to or use of a beach or headland. The intertidal zone is not an area generally used by the public. Access is restricted by tides and physically by adjoining waterfront structures and boundaries. The proposal has been designed to have an acceptably low risk of damage and pose an acceptably low threat to public safety.

For Section 27(b), the proposal is not expected to cause erosion to the beach or adjacent land. Given the low possibility of any damage to the structures, it is considered unnecessary to apply a maintenance condition as per Section 27(b)(ii) in this case. It should be noted that the proposed structures will be designed and monitored during construction by an appropriately qualified structural engineer to mitigate any potential damage to the structure.



# 6. CONCLUSION

In conclusion, the proposal aligns with the stipulations set forth in Pittwater LEP 2014 and PDCP 21, while also successfully meeting the prerequisites of SRH21 and CMA16.

A comprehensive Marine Habitat Survey report was conducted to assess the potential impacts of the proposal on the local marine ecosystem. This detailed analysis confirms the proposal's adherence to the aquatic ecological conservation requirements outlined in Pittwater 21 DCP and the Fisheries Management Act.

Notably, the proposal has obtained consent from the Department of Primary Industries (Fisheries) and Roads and Maritime Services, underscoring its alignment with all necessary regulatory requirements.

Considering the proposal's unwavering compliance with zoning and planning objectives, it is wellpositioned to receive conditional consent, thereby allowing the construction of the proposed water recreation structures. This outcome reflects a harmonious balance between development goals and environmental preservation.

Yours faithfully,

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Gregory Stevens Graduate Surveyor