



Statement of Environmental Effects

Proposed three (3) lot Torrens Title Subdivision

100 South Creek Road, Cromer
(Lot 1, DP1220196)

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

August 2021

Statement of Environmental Effects

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PART A PRELIMINARY

1.1 INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared by Willowtree Planning on behalf of EG. This SEE is submitted to Northern Beaches Council (Council) to support a Development Application (DA) for the proposed three (3) lot Torrens Title subdivision at 100 South Creek Road, legally described as Lot 1 in DP 1220196 (Subject Site).

The proposed development entails provisions for the following components, including:

- Three (3) Lot Torrens Title Subdivision

The Subject Site is zoned IN1 General Industrial pursuant to the *Warringah Local Environmental Plan 2011* (WLEP2011) and is located within the Northern Beaches Local Government Area (LGA). The proposed development is permissible with development consent within the IN1 zone and is considered contextually appropriate. Furthermore, the proposed development does not seek consent to amend the approved building envelope, Height of Building (HOB) or Gross Floor Area (GFA) and is consistent with the objectives and provisions of the WLEP2011.

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

Based on the assessment undertaken, it is recommended that favourable consideration to the approval of the DA be given by Council.

The structure of this SEE is as follows:

- **Part A** Preliminary
- **Part B** Site Analysis
- **Part C** Proposed Development
- **Part D** Legislative and Policy Framework
- **Part E** Environmental Assessment
- **Part F** Conclusion

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PART B SITE ANALYSIS

2.1 SITE LOCATION AND CHARACTERISTICS

The Subject Site is located at 100 South Creek Road, Cromer, also known as 4 – 10 Inman Road, Cromer. The Subject Site is bound by South Creek Road to the south and Inman Road to the west. The north-western corner of the Subject Site is bound by Orlando Road, which connects to Parkes Road. The Subject Site also has frontage to Campbell Avenue. The remainder of the Subject Site shares a common boundary with existing residential dwellings and childcare centre to the north.

The Subject Site is zoned IN1 General Industrial, pursuant to the WLEP2011 and includes mostly office buildings and large warehouse/manufacturing buildings. Zones surrounding the Subject Site include RE1 – Public Recreation, RE2 – Private Recreation, SP2 – Infrastructure, and R2 – Low Density Residential.

Located twenty (20) kilometres from the Sydney CBD, the Subject Site is within the Cromer Industrial Precinct, close to the Northern Beaches Hospital, the B-line bus network, and the Beaches Link Tunnel project. It is also near to the Dee Why Town Centre, which is undergoing significant urban renewal.

The Subject Site has been significantly developed and includes a variety of buildings and structures, ranging in age from the 1920s through to 2006, with works commenced to facilitate the redevelopment works approved in 2020. Three (3) separate heritage listings apply to the Subject Site, under the WLEP 2011, being; Item 52: 'Roche Building'; Item 53: 'Givaudan-Roure Office'; and Item 38: 'Trees'.

The existing Site characteristics are depicted in **Figures 1 and 2** below.

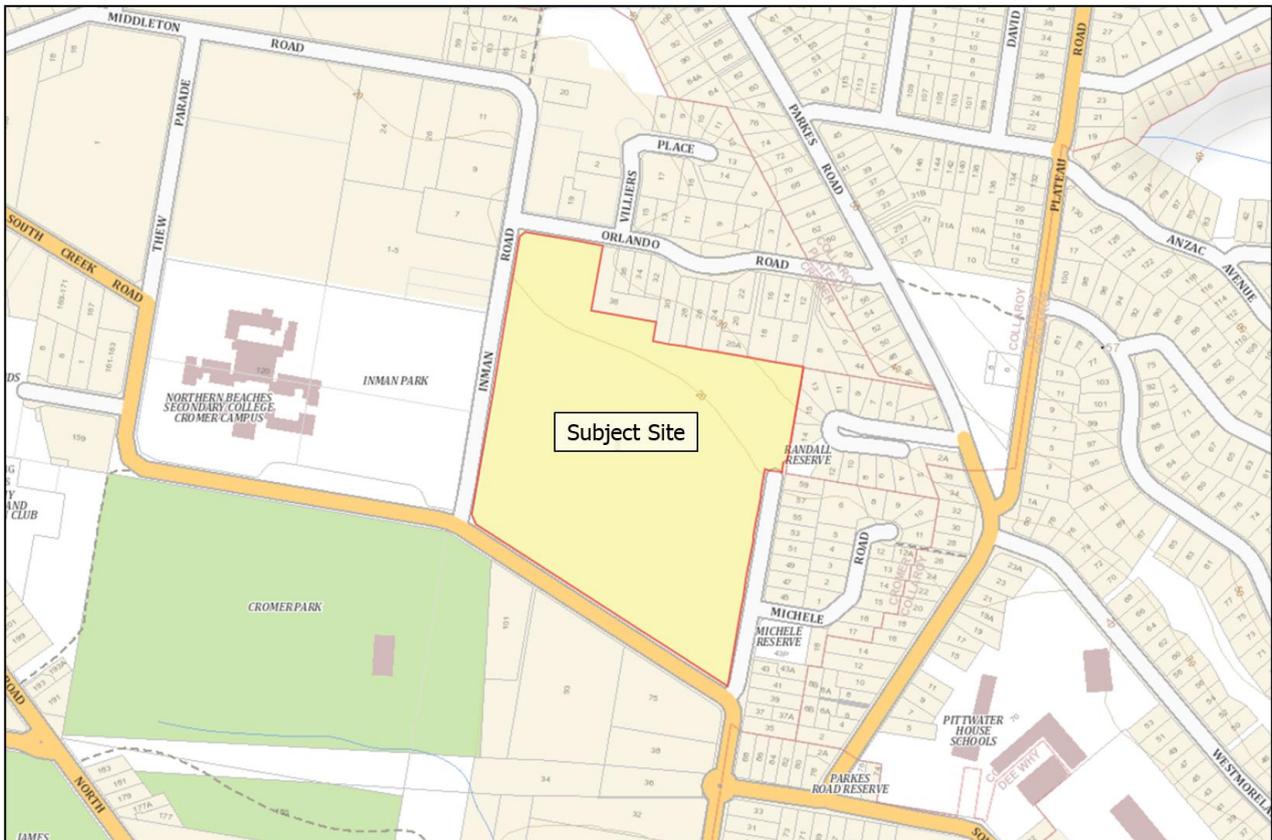


Figure 1. Cadastral View (Source: Six Maps 2021)

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Figure 2. Aerial View (Source: Nearmap 2021)

2.2 HISTORIC CONSENTS

Table 1 below is a summary of the DA's relating to the Site that have been determined or are under assessment:

Table 1. Previous Consents		
Application ID	Date	Description
Mod2020/0611	07/12/2020	Modification of Development Consent 2019/1346 granted for Demolition works and alterations and additions to an existing industrial facility including new warehouse and self storage office premises and ancillary cafe.
DA2019/1346	27/11/2019	Demolition works and alternations and additions to an existing industrial facility, including new warehouse, and self-storage, office premises and ancillary café
DA2017/0948	25/09/2017	Removal of Signage from a heritage listed industrial building (Roche)
Mod2017/0202	01/08/2017	Modification of Development Consent DA2017/0438 granted for Demolition Works and Tree Removal
DA2017/0438	11/05/2017	Demolition Works and Tree Removal
DA2017/0236	20/03/2017	Tree Application

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PART C PROPOSED DEVELOPMENT

3.1 AIMS AND OBJECTIVES OF THE PROPOSAL

This DA seeks Development Consent for Torrens Title subdivision at the Subject Site.

The proposal has been designed to remain consistent with surrounding land uses within the immediate area and the wider locality within the Northern Beaches LGA. The following objectives have been identified as forming the basis of the proposed use, including:

- Design the Subject Site to support continual industrial use;
- Ensure minimal environmental and amenity impact;
- Support employment generating land uses; and
- Ensure development is compatible with surrounding development and the local context.

The Subject Site and proposed subdivision design are considered to meet the objectives of the project as it enables the creation of three (3) industrial allotments on land that has been zoned for industrial development.

3.2 DEVELOPMENT STATISTICS

The proposal seeks development consent for subdivision. Specifically, the proposal entails the following:

- Three (3) lot Torrens Title subdivision to create:

Stage 1:

- One (1) allotment with an area of 36,527m² (proposed Lot 1);
- One (1) allotment with an area of 32,728m² (proposed Lot 2); and
- One (1) allotment with an area of 5,420m² (proposed Lot 3).

Further details are provided within the Subdivision Plans which can be found at **Appendix 1**.

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PART D LEGISLATIVE AND POLICY FRAMEWORK

4.1 STATUTORY PLANNING FRAMEWORK OVERVIEW

This Part of the SEE addresses and responds to the legislative and policy requirements relevant to the proposed development at the Site in accordance with the EP&A Act. The statutory planning framework relevant to the proposed development at the Site includes:

State & Regional Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*

Local Planning Context

- *Warringah Local Environmental Plan 2011*
- *Warringah Development Control Plan 2011*

4.2 ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979

The EP&A Act is the overarching governing statute pertaining to planning and development legislation in New South Wales. Pursuant to Part 4, the proposal is considered local development.

4.2.1 Section 4.15(1) of the EP&A Act

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a DA. The relevant matters for consideration under Section 4.15(1) of the EP&A Act are provided in **Table 2** below.

Table 2. Section 4.15(1)(A) Considerations	
Section	Response
Section 4.15(1)(a)(i) any environmental planning instrument, and	The principal EPI for the proposed development on the Subject Site is WLEP2011.
Section 4.15(1)(a)(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	There are no currently proposed EPIs that have been subject to public consultation which is relevant to the Site or proposal.
Section 4.15(1)(a)(iii) any development control plan, and	The applicable Development Control Plan (DCP) is the <i>Warringah Development Control Plan 2011</i> (WDCP2011), with the relevant provisions discussed below in Section 4.6 of this SEE.
Section 4.15(1)(a)(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	There are no voluntary planning agreements (VPA) applicable to the Site.
Section 4.15(1)(a)(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The proposed development comprises local development.
Section 4.15(1)(b)-(c)	The potential environmental impacts and the suitability of the Site for the proposed development are discussed in Part E of this SEE.

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4.2.2 Section 4.46 of the EP&A Act – Integrated Development

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

It is noted that the proposed development does not contemplate any physical works, therefore is considered not to trigger Integrated Development pursuant to Section 4.46 of the EP&A Act.

4.3 ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2000

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

(1) *A development application:*

(a) be in the form that is approved by the Planning Secretary and made available on the NSW planning portal, and

The DA includes all relevant information approved by the Planning Secretary and in accordance with the NSW Planning Portal guidelines.

(b) contain all of the information that is specified in the approved form or required by the Act and this Regulation, and

The DA shall be accompanied with all the relevant consultant reports as required under the Act and Regulation. This includes the appropriate application form provided by Northern Beaches Council which has been completed and utilised in the preparation of the DA.

(c) be accompanied by the information and documents that are specified in Part 1 of Schedule 1 or required by the Act and this Regulation, and

The DA includes all relevant information including details of the development, address and formal particulars, estimated cost of development, owner's consent, supporting documents including Site Plan and Statement of Environmental Effects.

(d) be lodged on the NSW planning portal.

The DA shall be lodged via the NSW Planning Portal.

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

4.4 WARRINGAH LOCAL ENVIRONMENTAL PLAN 2011

The WLEP2011 is the primary EPI that applies to the Site. The relevant provisions of the WLEP2011 as they relate to the Subject Site are considered below in **Table 3** and **Table 4**.

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Zoning and Permissibility

Table 3. IN1 General Industrial Land Use Table	
Land Use Table	
Objectives of zone	<ul style="list-style-type: none"> ▪ To provide a wide range of industrial and warehouse land uses. ▪ To encourage employment opportunities. ▪ To minimise any adverse effect of industry on other land uses. ▪ To support and protect industrial land for industrial uses. ▪ To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area. ▪ To enable a range of compatible community and leisure uses. ▪ To maintain the industrial character of the land in landscaped settings. <p>The proposed subdivision is consistent with the objectives of the IN1 Industrial Land Use zone as it will support the viability and continued operation of the Site for industrial purposes.</p>
Permitted without consent	<i>Nil</i>
Permitted with consent	<p><i>Boat building and repair facilities; Depots; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Light industries; Liquid fuel depots; Neighbourhood shops; Oyster aquaculture; Places of public worship; Roads; Storage premises; Take away food and drink premises; Tank-based aquaculture; Timber yards; Vehicle body repair workshops; Vehicle repair stations; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not specified in item 2 or 4</i></p> <p>Pursuant to the WLEP2011, General industries are permitted with consent within the IN1 General Industrial zone, for which the proposed subdivision will support the ongoing use of the Site.</p>
Prohibited	<p><i>Advertising structures; Agriculture; Air transport facilities; Amusement centres; Animal boarding or training establishments; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Eco-tourist facilities; Educational establishments; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Forestry; Function centres; Health services facilities; Heavy industrial storage establishments; Heavy industries; Highway service centres; Home-based child care; Home businesses; Home occupations; Home occupations (sex services); Information and education facilities; Marinas; Mooring pens; Moorings; Open cut mining; Passenger transport facilities; Pond-based aquaculture; Port facilities; Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Research stations; Residential accommodation; Restricted premises; Rural industries; Tourist and visitor accommodation; Veterinary hospitals; Water recreation structures; Wharf or boating facilities</i></p>

The proposed subdivision is innominate development and therefore are permissible with consent.

A review of Part 4, 5 and 6 development standards of the WLEP2011 has determined the following clauses that require consideration.

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Table 4. Development Standards	
Clause	Comment
Clause 4.1 – Minimum subdivision lot size	The Site is subject to a minimum lot size of 4,000m ² under the WLEP2011 (refer to Figure 3). No lots are proposed that are under the applicable minimum lot size as displayed in the Subdivision plan at Appendix 1 , complying with Clause 4.1.
Clause 4.3 – Height of buildings	The Site is subject to a maximum Height of Building (HOB) of 11m under the WLEP2011. No built form works are proposed under this DA which would result in additional height to the existing buildings.
Clause 4.4 – Floor space ratio	The Subject Site is not subject to a maximum Floor Space Ratio (FSR) under the WLEP2011. No built form works are proposed under this DA which would result in additional GFA to the existing buildings.
Clause 5.10 – Heritage conservation	As depicted in Figure 5 below, the Subject Site is listed as an item of environmental heritage in Schedule 5 of the WLEP2011. The proposal is for the subdivision of the Site and no physical works are proposed that would have an adverse impact or detract from the heritage significance of any heritage item on the Site. For further consideration refer to Section 5.3 of this SEE.
Clause 7.14 – Acid Sulfate Soils	The Subject Site is not identified as being subject to Acid Sulfate Soils under LEP mapping. Notwithstanding, no works are proposed below the natural ground surface, or which are likely to lower the water table are proposed under this DA.

The proposal does not seek any variations to the development standards pursuant to the WLEP2011.

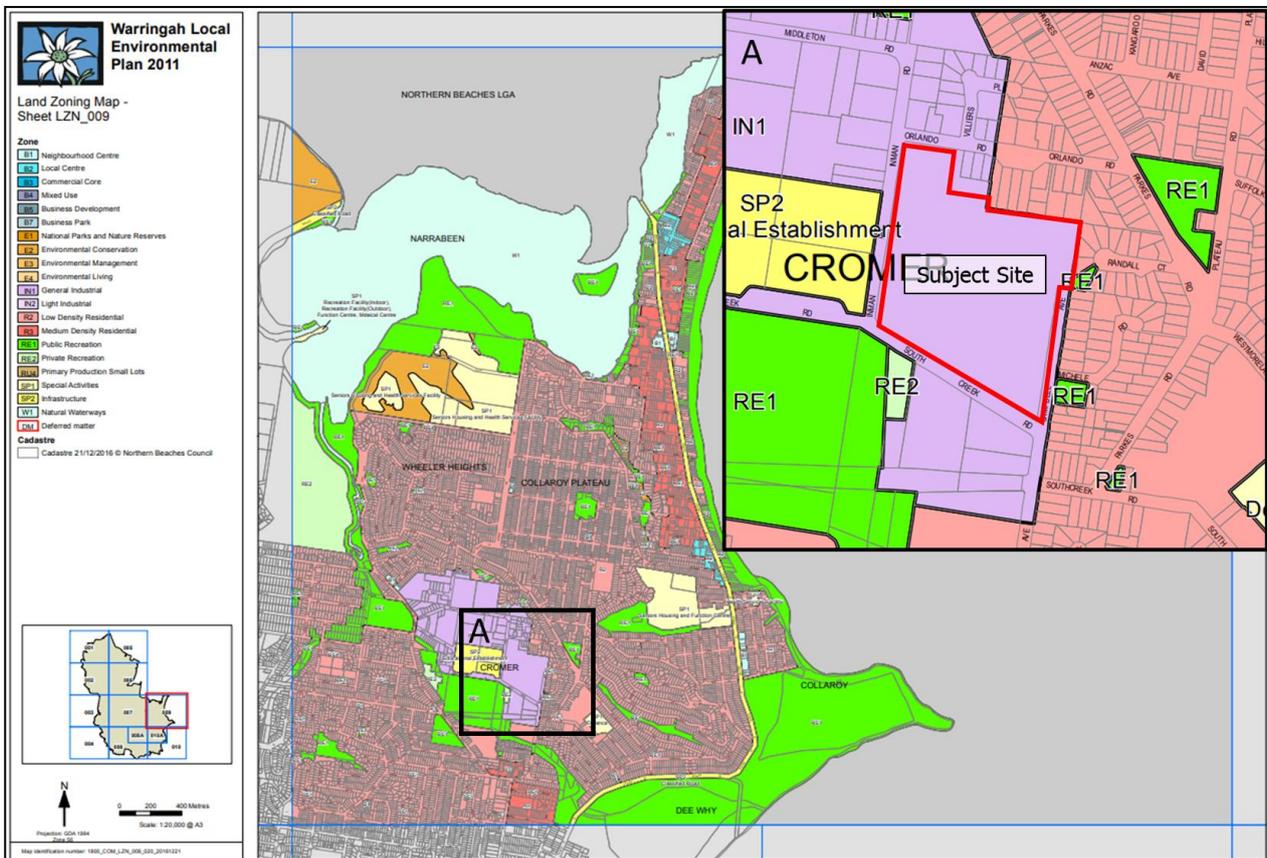


Figure 3. WLEP2011 Land Zoning Map (Source: NSW Legislation 2021)

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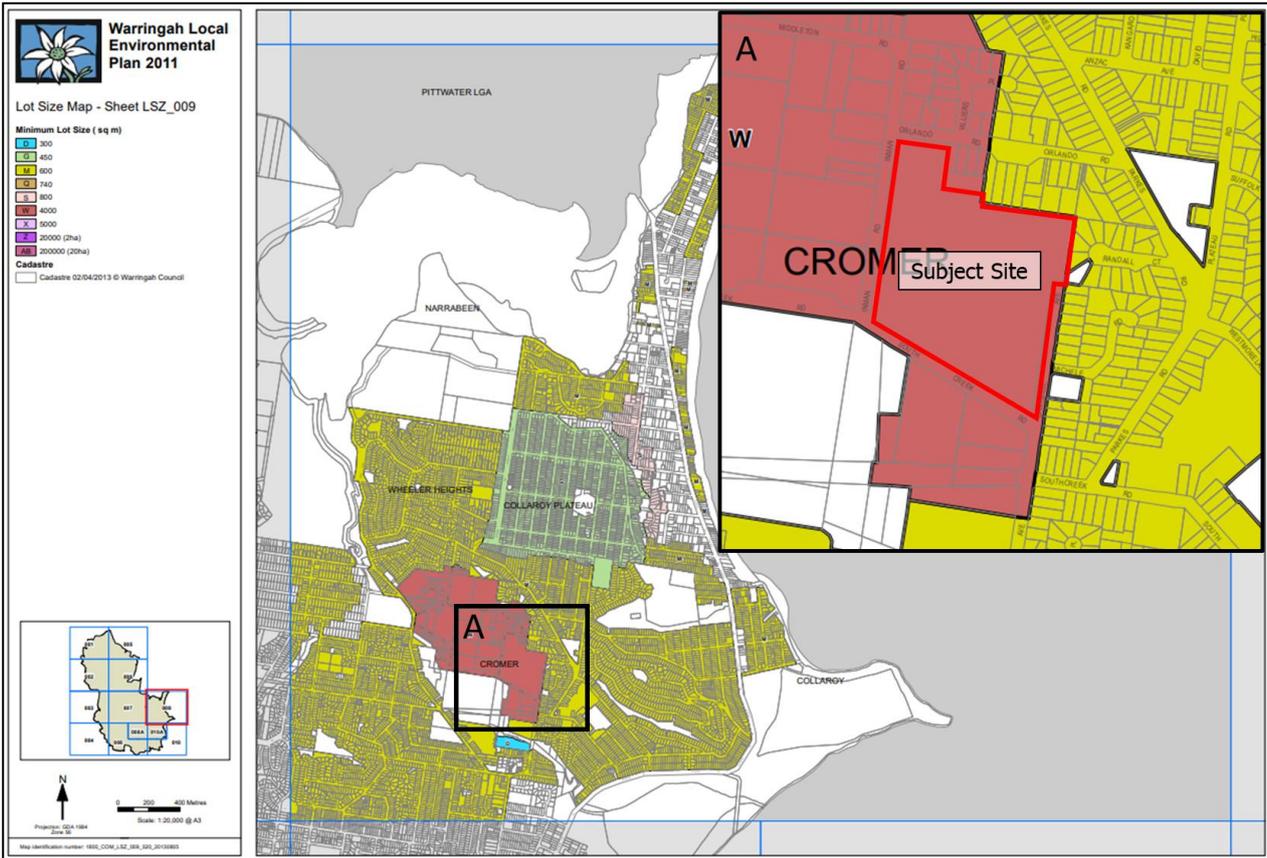


Figure 5. WLEP2011 Minimum Lot Size Map (Source: NSW Legislation 2021)

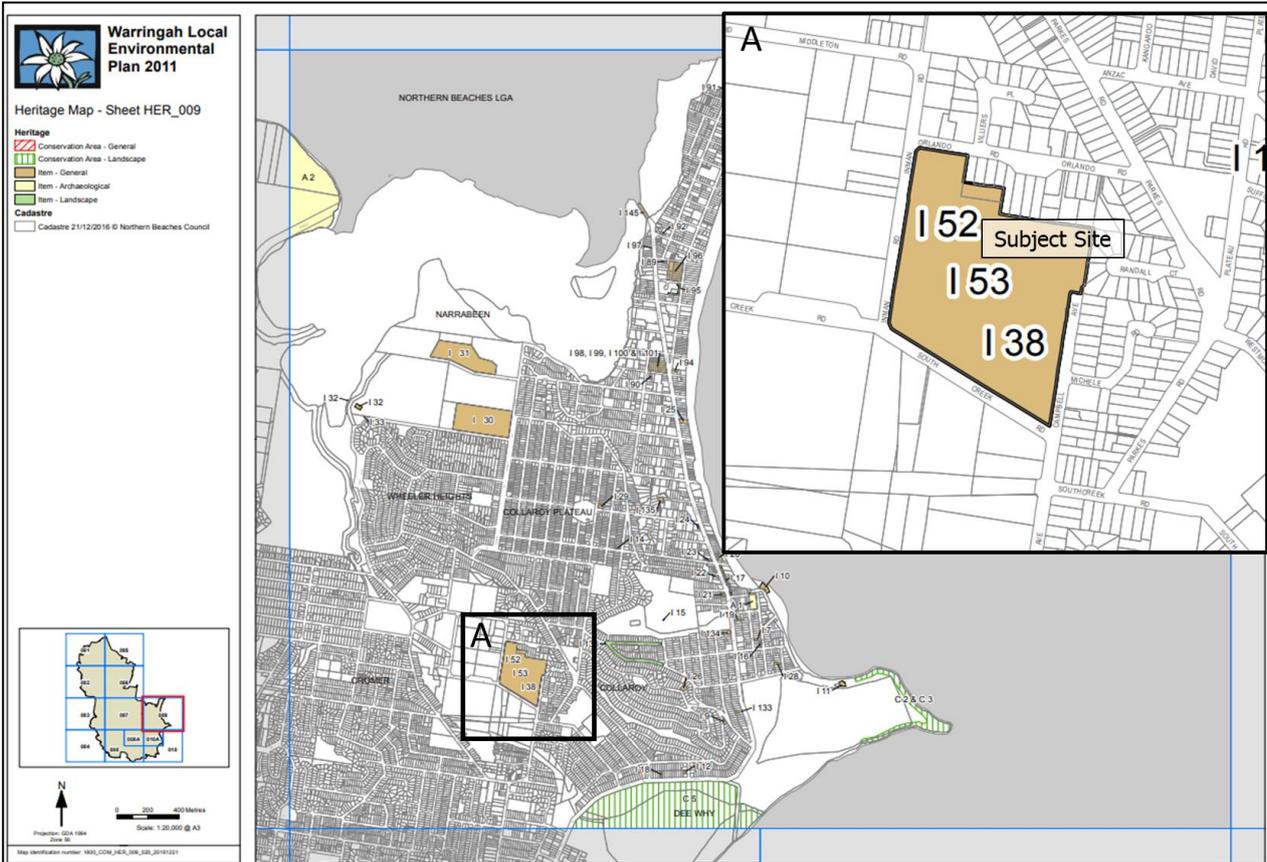


Figure 4. WLEP2011 Heritage Map (Source: NSW Legislation 2021)

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4.5 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No Draft EPIs apply to the Site.

4.6 WARRINGAH DEVELOPMENT CONTROL PLAN 2011

The WDCP2011 supplements WLEP2011 and provides a comprehensive framework for development in the Northern Beaches LGA. A comprehensive assessment of the proposal against the relevant provisions of WDCP2011 is provided in **Table 5** below.

Table 5. Warringah Development Control Plan 2011		
Development Control	Compliance	Planning Assessment Comment
Part C Siting Factors		
C1 Subdivision		
Access <i>2. Motor vehicle access to each residential allotment is required from a constructed and dedicated public road.</i> <ul style="list-style-type: none">▪ <i>Where access is proposed to a section of unconstructed public road, then the subdivision will need to provide legal, constructed access to the Council's satisfaction.</i>▪ <i>Access for Council service vehicles, emergency vehicles and garbage collection vehicles must be provided.</i>▪ <i>Driveways, accessways, etc, to allotments should have a gradient not exceeding 1:4 and allow for transitions at a minimum length of 1.5m and at a grade no steeper than 1:10.</i>▪ <i>Driveways in excess of 200 metres will not be allowed for residential development.</i>▪ <i>Driveways that are 30m or more in length require a passing bay to be provided every 30m. To provide a passing bay, driveways shall be widened to 5.0m for a distance of at least 10m.</i>▪ <i>Passing bays should have regard to sight conditions and minimise vehicular conflict.</i>▪ <i>Vehicular ingress/egress points to internal lots may be used as passing/turning bays, subject to extension of a right-of-carriageway over the passing/turning bay.</i>▪ <i>Rights-of-carriageway should be located so as to accommodate all vehicle turning facilities.</i>	N/A	The proposed subdivided lots are not for residential purposes. Accordingly, further consideration is not required in this respect.
Design and construction <i>3. All roads, rights of carriageway, drainage design and construction is to be in accordance with Council's policy requirements including; AUSPEC 1 - Council's Specification for Engineering Works, Development Engineering</i>	N/A	The proposal is only for subdivision, no physical works are proposed relating to roads, rights of carriageway or drainage design and construction.

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<p><i>Minor Works Specification, On Site Stormwater Detention (OSD) Technical Specification and Council's Water Sensitive Urban Design Policy. Additionally, internal roads must be designed in accordance with the relevant Australian Standards.</i></p> <p><i>Subdivision design needs to maximise and protect solar access for each dwelling by considering factors such as orientation, shape, size and lot width.</i></p>		
<p>Drainage</p> <p><i>4. Provision should be made for each allotment to be drained by gravity to a Council-approved drainage system. The topography of the land should not be altered to adversely affect the natural drainage patterns. Stormwater should drain directly to a Council-approved drainage system and not via adjoining properties unless via a formalised interallotment drainage system. The proposed allotments are to be drained to the direction of the natural fall of the land. Interallotment drainage easements will be required through adjoining properties to adequately drain land to Council's downstream system.</i></p>	YES	<p>The proposal is only for subdivision, no physical works are proposed relating to previously approved drainage on the Site. Accordingly, further consideration is not required in this respect.</p>
<p>Restrictions</p> <p><i>5. Any easement, right-of-carriageway, or other restriction that is placed on the title of any land as a requirement of the approval of the subdivision is to be protected by a positive covenant or like instrument with the Council nominated as a party.</i></p>	NOTED	<p>Noted.</p>
<p>Environmentally constrained land</p> <p><i>6. In areas subject to constraints such as flooding, tidal inundation, threatened species, landslip risk, bushfire or any other matter, adequate safe area for building, where the risk from hazard is minimised, is to be provided within an allotment.</i></p> <p><i>Where possible, lot boundaries should utilise natural land features such as creeks, escarpments and rock outcrops.</i></p>	YES	<p>It is noted that pursuant to the WLEP2011 portions of the Site is subject to landslip risk (refer to Figure 6). Lots have been designed to ensure the safe, ongoing use of existing buildings for purpose of industry and any future development that may occur.</p>
<p>Bushfire</p> <p><i>7. Subdivision should be designed to minimise the risk from potential bushfire. Asset protection zones should be contained within the property boundaries of the new subdivision.</i></p>	YES	<p>The Site is not identified as being located in Bushfire Prone Land pursuant to the Warringah Bushfire Prone Land Map 2016. Notwithstanding, subdivision has been designed to minimise the risk from potential bushfires.</p>
<p>C3 Parking Facilities</p>		
<p><i>1. The following design principles shall be met:</i></p> <ul style="list-style-type: none"> ▪ <i>Garage doors and carports are to be</i> 	YES	<p>Parking is located at grade within the Site and in a basement car park to</p>

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<p><i>integrated into the house design and to not dominate the façade. Parking is to be located within buildings or on site.;</i></p> <ul style="list-style-type: none"> ▪ <i>Laneways are to be used to provide rear access to carparking areas where possible;</i> ▪ <i>Carparking is to be provided partly or fully underground for apartment buildings and other large scale developments;</i> ▪ <i>Parking is to be located so that views of the street from front windows are not obscured; and</i> ▪ <i>Where garages and carports face the street, ensure that the garage or carport opening does not exceed 6 metres or 50% of the building width, whichever is the lesser.</i> 		<p>not obscure views of the street from front windows. Notwithstanding, no changes to approved car parking under DA2019/1346 is proposed.</p>
<p><i>2. Off street parking is to be provided within the property demonstrating that the following matters have been taken into account:</i></p> <ul style="list-style-type: none"> ▪ <i>the land use;</i> ▪ <i>the hours of operation;</i> ▪ <i>the availability of public transport;</i> ▪ <i>the availability of alternative car parking; and</i> ▪ <i>the need for parking facilities for courier vehicles, delivery / service vehicles and bicycles.</i> 	<p>YES</p>	<p>Sufficient parking has been provided taking into consideration the Sites land use, hours of operation, availability of public transport, availability of alternative car parking and the need for parking of courier, delivery and service vehicles and bikes. These have been taken into consideration under DA2019/1346 and no changes to parking are proposed under this DA.</p>
<p><i>3. Carparking, other than for individual dwellings, shall:</i></p> <ul style="list-style-type: none"> ▪ <i>Avoid the use of mechanical car stacking spaces;</i> ▪ <i>Not be readily apparent from public spaces;</i> ▪ <i>Provide safe and convenient pedestrian and traffic movement;</i> ▪ <i>Include adequate provision for manoeuvring and convenient access to individual spaces;</i> ▪ <i>Enable vehicles to enter and leave the site in a forward direction;</i> ▪ <i>Incorporate unobstructed access to visitor parking spaces;</i> ▪ <i>Be landscaped to shade parked vehicles, screen them from public view, assist in micro-climate management and create attractive and pleasant places;</i> ▪ <i>Provide on site detention of stormwater, where appropriate; and</i> ▪ <i>Minimum car parking dimensions are to be in accordance with AS/NZS 2890.1.</i> 	<p>YES</p>	<p>Car parking has been designed in consideration of Control 3. Notwithstanding, no changes to approved car parking under DA2019/1346 is proposed.</p>
<p><i>4. Carparking is to be provided in accordance with Appendix 1 which details the rate of car parking for various land uses. Where the carparking rate is not specified in Appendix 1 or the WLEP, carparking must be adequate for the development having regard to the objectives and requirements of this clause. The rates specified in the Roads and Traffic Authority's</i></p>	<p>YES</p>	<p>Car parking provision for the Site was previously considered under DA2019/1346 and no further alterations to car parking or any development that will result in the intensification of the Site are proposed under this DA. The WDCP2011, RMS Guide 2002 and</p>

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<p><i>Guide to Traffic Generating Development should be used as a guide where relevant.</i></p>		<p>anticipated car parking demand were all assessed by GTA Consultants under DA2019/1346 and a total of 231 car parking spaces (72 at grade and 159 basement car parking spaces) was approved by Council. Furthermore, GTA Consultants have provided a Traffic Report further assessing the car parking requirements of the proposed subdivision which can be found at Appendix 2.</p>
<p><i>5. Adequate provision for staff, customer and courier parking, and parking and turning of vehicles with trailers must be provided if appropriate to the land use.</i></p> <p><i>6. For bulky goods premises adequate on-site parking spaces for service/delivery vehicles at a convenient location, separated from customer parking must be provided.</i></p> <p><i>7. Where appropriate, car parking which meets the needs of people with physical disabilities must be provided in accordance with the relevant Australian Standard.</i></p>	<p>YES</p>	<p>Car parking has been designed in consideration of Control 5, 6 and 7. Notwithstanding, no changes to approved car parking under DA2019/1346 is proposed.</p>
<p><i>8. For Forest Way Village car parking at ground level is to be provided for individual units.</i></p>	<p>N/A</p>	<p>The Site is not located in Forest Way Village.</p>

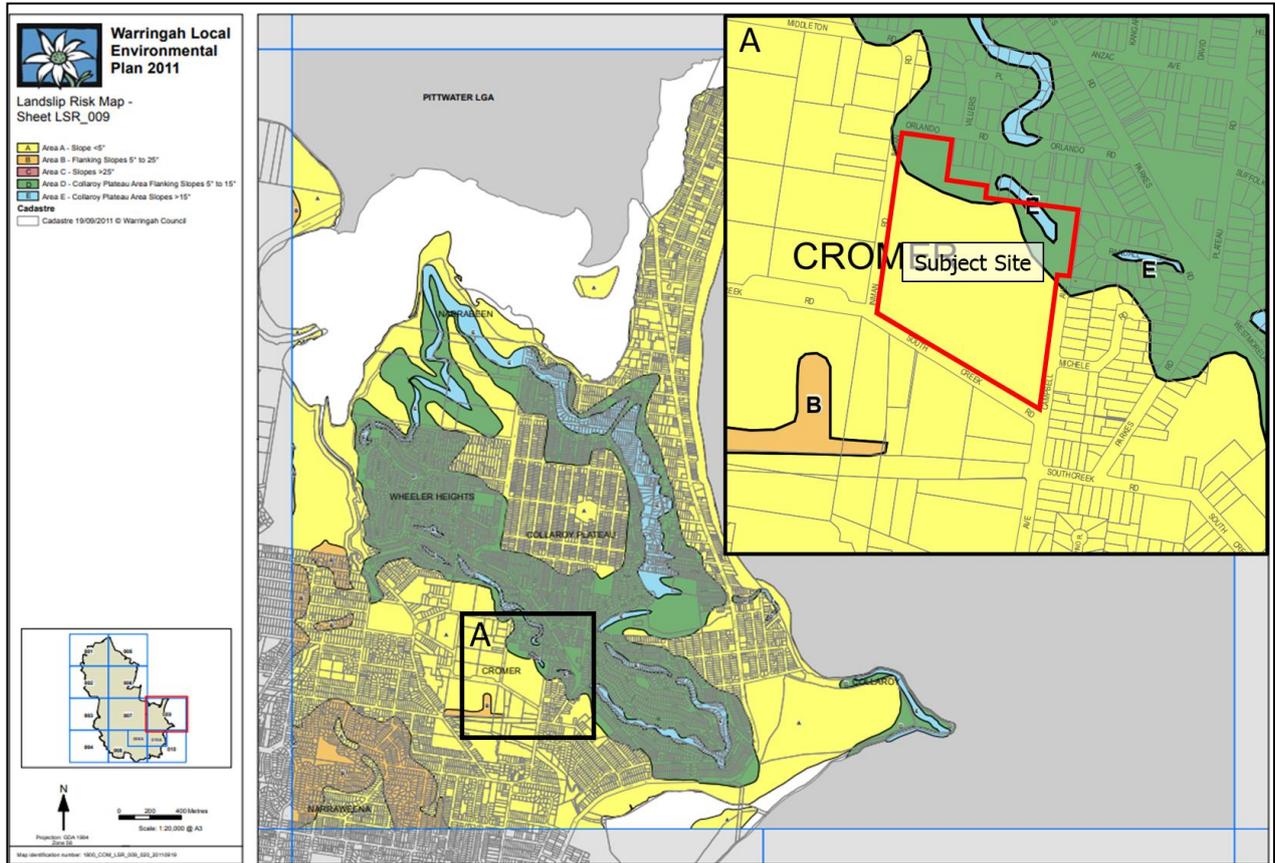


Figure 6. WLEP2011 Landslip Risk Map (Source: NSW Legislation 2021)

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PART E LIKELY IMPACTS OF THE DEVELOPMENT

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

5.1 CONTEXT AND SETTING

The proposed subdivision has been designed to facilitate the continued use of the Site for the purposes of industry/warehousing, which is consistent with the intended development of land within the Cromer Industrial Precinct. The proposal will promote the efficient and sustainable use of designated employment lands for future employment-generating development and therefore, through the creation of lots suitable for industry, the proposal will benefit the local and regional economies and populations.

The proposed development is compatible with surrounding land uses including established warehouses and industrial facilities. While the Site is located in proximity to residential development, no physical works are proposed, only subdivision.

The proposal will not exhibit any significant environmental impacts and will not adversely impact on the amenity or operations of any adjoining sites. Therefore, the proposed subdivision is considered compatible with the Site context.

5.2 LANDSCAPING

Pursuant to the WDCP2011 the Site is not subject to a minimum area of landscaped open space. Notwithstanding, the proposal is for subdivision only and no alterations to the approved landscaping under **DA2019/1346** are proposed.

5.3 TRAFFIC & TRANSPORT

The proposal is for subdivision only and therefore will not directly impact on traffic generation, access, or car parking as approved under **DA2019/1346**.

A Traffic Report (**Appendix 2**) has been prepared by GTA Consultants to assess the vehicular access arrangements for the proposed subdivided lots.

It was concluded by GTA Consultants that the proposed subdivision is considered suitable to accommodate future development of the residual land from a traffic and transport perspective and without impacting the adjacent road network or the operation of the approved DA for Lot 1. Specifically, appropriate site access, circulation and parking arrangements can be developed for Lots 2 and 3. The proposed subdivision will provide adequate access points for each proposed Lot and the vehicular access arrangements are considered appropriate to serve the subdivided Lots.

5.4 HERITAGE

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

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

The proposal is for the subdivision of the Site and no physical works are proposed that would have an adverse impact or detract from the heritage significance of any heritage item on the Site. All heritage impacts were considered and addressed as part of the recent development approval (DA2019/1346) for redevelopment of the Subject Site.

Statement of Environmental Effects

Proposed three (3) lot Torrens Title Subdivision
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The proposed subdivision seeks to facilitate a three (3) lot Torrens Title subdivision, with no physical works and therefore no material impact on the items of heritage.

Accordingly, further heritage consideration is not required in this respect.

5.5 CUMULATIVE IMPACTS

No foreseeable cumulative impacts are to result from the proposed development. Rather the proposed subdivision will create three (3) allotments and in association will the continued use of the Site for industrial purposes. This is commensurate with the intended development of the Site and its surrounds.

5.6 SUITABILITY OF SITE FOR DEVELOPMENT

The Site is located within an established industrial area and is zoned for IN1 General Industrial under WLEP2011. The proposed subdivision will create allotments that are suitable for industry, which is consistent with the zoning of the Site and the surrounding context.

Accordingly, the Site is considered to be suitable for the subdivision and is consistent with the aims and objectives of the IN1 zone in that it seeks to facilitate future employment generating development that responds to the characteristics of the land and is compatible with surrounding land uses.

5.7 SUBMISSIONS

No submissions have been received in relation to the proposed development; however, the proponent is willing to address any submissions, should they be received by Council.

5.8 THE PUBLIC INTEREST

The proposed development will have no adverse impact on the public interests and is in accordance with the aims and objectives of the WLEP2011 and WDCP2011. The development of the Site will be carried out to support the continued use of the Site for the purpose of industry that shall result in a positive impact for the Northern Beaches LGA and the broader Region.

Statement of Environmental Effects

Proposed three (3) lot Torrens Title Subdivision
100 South Creek Road, Cromer (Lot 1, DP 1220196)

PART F CONCLUSION

The proposed subdivision of 100 South Creek Road, Cromer (Lot 1 in DP 1220196), is permissible with consent pursuant to WLEP2011. The proposal will create three (3) new allotments for future industrial purposes. The proposal is consistent with the industrial use of land within the established Cromer Industrial Precinct.

This SEE provides an assessment of the proposal against the relevant environmental planning framework, including WLEP2011 and WDCP2011. The assessment finds that the proposal is consistent with the objectives and controls of the relevant instruments and policies. No significant adverse environmental, economic or social impacts have been identified as likely to arise from the proposed development. Rather, the proposal will provide for positive impacts, including facilitating the efficient and suitable development of industrial lands and the future generation of significant employment in the industrial sector.

In overview it is considered that the proposal should warrant a positive assessment for the following compelling reasons:

- The proposal seeks to segregate the Subject Site to facilitate land for the approved built-form and operations from non-developed area for the future development.
- The proposal continues the intended outcome of the Subject Site for employment-generating uses suitable for industry and warehousing.
- The proposal will result in significant economic benefit through supporting the ongoing use of the Site for industry.
- The proposed subdivision is highly compatible with surrounding land uses and positively contribute to the established industrial character of this designated employment precinct.
- The proposal is permitted with consent in the IN1 General Industrial zone pursuant to WLEP2011.
- The proposal is consistent with the objectives and provisions of the WDCP2011.
- The proposal will preserve suitable access and car parking for each of the proposed lots.

The proposed development is permissible within the zone and is compatible with the zone objectives. As stipulated previously in this report, the matters for consideration under Section 4.15 of the EP&A Act have been satisfactorily addressed demonstrating the built form is compatible with the surrounding environment.

Therefore, it is recommended that Northern Beaches Council support the proposal for a favourable determination.