



## Pre-lodgement Meeting Notes

<b>Application No:</b>	PLM2022/0146
<b>Meeting Date:</b>	9 August 2022
<b>Property Address:</b>	69 Bassett Street MONA VALE
<b>Proposal:</b>	Demolition and construction of a three storey vehicle storage facility and take-away café
<b>Attendees for Council:</b>	Jordan Davies – Principal Town Planner Ricky Kwok – Traffic Engineer Christina Femia – Flood Engineer Peter Fox – Environmental Health Jeff Cooke – Senior Urban Designer

### General Comments/Limitations of these Notes

These notes have been prepared by Council's Development Advisory Services Team on the basis of information provided by the applicant and a consultation meeting with Council staff. Council provides this service for guidance purposes only.

These notes are an account of the advice on the specific issues nominated by the Applicant and the discussions and conclusions reached at the meeting.

These notes are not a complete set of planning and related comments for the proposed development. Matters discussed and comments offered by Council will in no way fetter Council's discretion as the Consent Authority.

A determination can only be made following the lodgement and full assessment of the application.

In addition to the comments made within these Notes, it is a requirement of the applicant to address the relevant areas of legislation, including (but not limited to) any State Environmental Planning Policy (SEPP) and any applicable sections of the Pittwater Local Environmental Plan 2014 and Pittwater 21 Development Control Plan, within the supporting documentation including a Statement of Environmental Effects, Modification Report or Review of Determination Report.

You are advised to carefully review these notes and if specific concern have been raised or non-compliances that cannot be supported, you are strongly advised to review your proposal and consider amendments to the design of your development prior to the lodgement of any development application.



## SPECIFIC ISSUES RAISED BY APPLICANT FOR DISCUSSION

### Response to Matters Raised by the Applicant

#### **Categorisation of Development (proposed land use)**

The proposed land use 'Storage Premises' is permitted in the IN2 zone and is defined as:

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

The proposal to store high end motor vehicles within the units (for a commercial purpose) is considered to meet this definition of a 'storage premises'.

At this stage, Council is not convinced that the area marked as 'events lounge' would be ancillary to the storage premises. This area contains a bar, seating and large outdoor terrace capable of accommodating a reasonably large number of people. If the applicant were to include this area (which at this stage Council would not recommend), the application must demonstrate why it is considered ancillary, otherwise it could be considered to be a 'function centre' in its own right which is not permissible in the IN2 Zone.

The proposed 'kiosk' would be permitted with consent in the zone as a 'Take away food and drink premises'. Please note a 'kiosk' is a prohibited land use so the application should make it clear that the proposal is for a 'Take away food and drink premises' which is permitted in the zone.

The application should be accompanied by an Operation Plan of Management to make it clear the functionality and use of the site.

#### **Building Height**

The site has an 11m height limit under the LEP Height of Buildings Map. However, the site is flood affected and therefore benefits from Clause 4.3(2B) which allows the height to be 10.5m above the Flood Planning Level.

The proposed development is up to 11m above the FPL or 12.2m from the natural ground level which is a departure from the development standard in the order of 11%. However, the proposed roof level is at RL14.46 which is slightly below the recently approved development immediately adjoining the site to the south under DA2021/1925, with this building having a parapet height of RL15.35. Furthermore, the proposed roof height is not inconsistent with the Mitre 10 Building which sits at approximately RL15.00. Therefore, the maximum height is considered consistent with what has been approved and on the surrounding sites.

The applicant's proposal to have the third level stepped away from the Bassett Street Frontage is welcomed as the site should present a compliant building height to Bassett Street, with any non-compliant portion stepped away from the Bassett Street frontage to provide an appropriate transition to the R2 Low Density Zone across the road.

As discussed below, the landscape treatment to Bassett street should be increased to an area capable of accommodating canopy trees and consistent with the requirement under the DCP. Council could not support a height breach with a deficient amount of landscaped area in the front setback.



## **Response to Matters Raised by the Applicant**

Therefore, subject to a well-founded Clause 4.6 variation request, increased landscaping along Bassett Street and the applicant having the upper level stepped back from Bassett Street, the height breach is capable of being supported.

### **Floor Space Ratio**

The scheme which was presented to Council has an FSR of approximately 1.2:1 FSR (20% departure from the control) which has been calculated in accordance definition of 'gross floor area' under the Pittwater LEP and using the latest relevant case law which assists clarifying the included GFA where there is any ambiguity under the LEP definition. Of note:

- The centralised area is included in FSR based on the LEP definition;
- The fire stairs and lift are taken to be 'common vertical circulation' which are shared between 4 tenancies and therefore, it would be reasonable to exclude this from FSR as established in *Landmark Group Australia Pty Ltd v Sutherland Shire Council [2016] NSWLEC 1577*.

The breach to both the building height and the FSR is of concern. The applicant would require a well-founded Clause 4.6 variation to establish the environmental planning ground to warrant such a breach, along with a design that minimises bulk and scale. The applicant should first consider if the building bulk and scale is compatible with the surrounds based on the volume of the building, the street setbacks and the quality of landscaping used to mitigate bulk and scale. The insufficient landscaped area along the Bassett Street frontage would not assist the applicant's cause in requesting to vary the FSR control. Of note, the building should provide an appropriate transition and frontage to the R2 Zone across the road.

The proposed building is well articulated, with a façade that provides a high level of visual interest and could be an example of a high quality building in the IN2 Zone (which is generally characterised by relatively simple industrial buildings). However, the onus would be on the applicant (and the written Cl 4.6 variation request) to convince Council and the Local Planning Panel that there are sufficient environmental planning grounds to warrant a breach of up to 20% for this development and that the building is compatible with regards to bulk and scale with the surrounding area, noting that this site is opposite the R2 Low Density Residential zone.

At present, it would be recommended that the FSR of the building be reduced.

### **Front building line setbacks**

See detailed discussion below.

### **Covenant along western portion of site**

The applicant asked Council for advice regarding the covenant which exists over the car parking around within the western portion of the site. Council has a copy of the Deposited Plan showing the easement area marked (B) within the site, however has not located any further information regarding the terms of the covenant or been provided with a copy by the applicant. This area looks to generally encompass the hard stand area used for parking of vehicles on the western side of the building.

The applicant should obtain their own legal advice and information regarding this covenant, including which properties are benefitted/burdened by the easement. Given the limited details Council has, Council cannot offer any opinion on how this covenant may restrict site development. However, should this covenant benefit the adjoining lot 4 with regards to parking,



#### Response to Matters Raised by the Applicant

access or vehicle manoeuvring, this must be addressed in the proposed development. If the covenant provides parking for the adjoining site, this must be resolved by way of amending the covenant or addressing this in the development application. This should be investigated and resolved prior to lodging any development application.

#### PITTWATER LOCAL ENVIRONMENTAL PLAN 2014 (PLEP 2014)

PLEP 2014 can be viewed at <https://www.legislation.nsw.gov.au/view/html/inforce/current/epi-2014-0320>

#### Part 2 - Zoning and Permissibility

<b>Definition of proposed development:</b> (ref. PLEP 2014 Dictionary)	Storage premises Take away food and drink
<b>Zone:</b>	IN2 Light Industrial
<b>Permitted with Consent or Prohibited:</b>	Permitted with consent

#### Clause 4.6 - Exceptions to Development Standards

Clause 4.6 enables the applicant to request a variation to the applicable Development Standards listed under Part 4 of the LEP pursuant to the objectives of the relevant Standard and zone and in accordance with the principles established by the NSW Land and Environment Court.

A request to vary a development Standard is not a guarantee that the variation would be supported as this needs to be considered by Council in terms of context, impact and public interest and whether the request demonstrates sufficient environmental planning grounds for the variation.

#### Part 4 - Principal Development Standards

Standard	Permitted	Proposed	Compliance
<b>Building Height</b>	11m or 10.5m above FPL	FPL on adjoining site was RL3.46. Proposed ridge is RL 14.46. 11m about FPL or 12.2m above NGL	No - 10.9% departure from 11m control.
<b>Floor Space Ratio</b>	1:1 (720.5sqm) FSR	1.2:1 FSR (870.8sqm)	No – 20% variation

Comment: See detailed discussion of both FSR and building height above.

#### PITTWATER 21 DEVELOPMENT CONTROL PLAN (P21DCP)

P21DCP can be viewed at <https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Pages/Plan/Book.aspx?exhibit=PDCP>

The following notes the identified non-compliant areas of the proposal only.



Part D9 Mona Vale Locality		
Control	Permitted	Proposed
<b>D9.6 Front Building Line</b>	6.5m	<u>Bassett Street</u> Ground Parking <b>1m</b> First Floor Façade <b>4m</b> Second floor façade <b>9.3m</b>  <u>Tengah Crescent</u> Façade <b>3.5m</b>
<p>The DCP requires a 6.5m front setback to Bassett Street. However, a variation clause is provided that states:</p> <p><i>c) a 2.5 metre reduction (i.e 4m setback) in the front building setback where parking is provided to the rear of the site, within the building, or is located where it is not readily visible from the street.</i></p> <p>The proposal provides a 4m setback to the building on Bassett Street, however, this 4m setback zone contains parking areas and driveways, which does not meet the intention of the variation clause. The variation clause also states the outcomes of the control must also be met. Of importance, the relevant outcomes require:</p> <p><i>Achieve the desired future character of the Locality.</i>  <i>Vegetation is retained and enhanced to visually reduce the built form. (En)</i>  <i>To enhance the existing streetscapes and promote a scale and density that is in keeping with the height of the natural environment.</i>  <i>To encourage attractive street frontages and improve pedestrian amenity.</i>  <i>To ensure new development responds to, reinforces and sensitively relates to the spatial characteristics of the existing urban environment.</i></p> <p>To qualify for the reduced building setback as per the variation, the proposal must provide a quality 4m zone of deep soil planting to enhance the existing streetscape and contribute to the landscape quality of the locality (and respond to the R2 Zone across the road). At present, the proposal does not adequately respond to the control and the landscaping must be increased in this area.</p> <p>In regards to the secondary street frontage (Tengah Crescent), the DCP states:</p> <p><i>*Where the outcomes of this control are achieved, Council may accept a minimum building setback to a secondary street of half the front building line. i.e. 3.25m</i></p> <p>The proposal to adopt a 3.5m front setback to Tengah Street is supported and this is consistent with the approved building to the south. Services and driveways should be minimised to allow opportunity for deep soil landscape planting to enhance the streetscape and assist softening the building form.</p>		
<b>D9.7 Side and rear building line</b>	Where adjoining other land zoned IN2 – Nil setback	South – Nil West - Nil



### Part D9 Mona Vale Locality

The proposal is compliant with the controls and will provide a nil setback to the existing development to the south and the approved development to the south when built.

The nil setback to the western boundary, although a change from the existing situation, is compliant with the control.

The applicant is to demonstrate that the nil setback to the western boundary will not have an unfavourable result with regards to the car parking turning area at 71 Bassett Street and is not inconsistent with the terms of any covenant on the western portion of the site.

### Specialist Advice

#### Urban Design

##### Controls

- Pittwater 21 Development Control Plan (Pittwater 21 DCP): Section A; Shaping Development in Pittwater, B; General Controls, D; Locality Specific Development Controls, Appendices
- Pittwater LEP
- Northern Beaches Council Public Space Vision & Design Guidelines

*Note: This advice is provided as an internal referral from the Urban Design Unit to the development assessment officer for consideration and coordination with the overall assessment.*

##### General

This report is a preliminary response to the architectural sketch drawings submitted by the applicant. The information supplied by the applicant is preliminary and therefore the response is proportionate to the information supplied and is preliminary.

The Pittwater DCP specifies what information is to be included with any application at the end of each section.

##### Height

The proposal is above the LEP height control. It is noted that the site is flood prone. The applicant should consider and address any potential overlooking to the private open space of the residential area to the north of Bassett Street.

##### FSR

The proposal appears to exceed the FSR control. The applicant may wish to scrutinise their FSR calculations and what has been included and excluded.

##### Building Bulk, Mass, Scale & Setbacks

##### Controls

- DCP; Section C3 Design Criteria for Industrial Development, D9 Mona Vale Locality.

DCP sections D9.6, D9.7, D9.9. Built structures, other than driveways, fences and retaining walls are not permitted within the front building setback. The minimum side and rear building line for



### Specialist Advice

built structures including pools and parking structures, other than driveways, fences and retaining walls.

DCP Setback Controls	Control Numeric	Proposed
Front building line	6.5, or established building line, whichever is the greater	Not evident on ground floor
Side building line	Nil	Nil
Rear building line	Nil	Nil

A low-density residential area is located to the north of Bassett Street opposite the subject site. In accordance with the Pittwater DCP the proposal should setback a minimum of 6.5m from the Bassett Street frontage. Any proposal will need to carefully consider the scale and massing of the building and how it responds to the low-density residential area opposite. The front setback should be landscaped and provide a buffer for the low-density residential north of Bassett Street.

### Sustainability

#### Controls

DCP; Section C3 Design Criteria for Industrial Development

Consider inclusion of energy & waters saving design and devices. Photovoltaic panels or solar hot water heaters should be included and maximised. Consider the inclusion of rainwater tanks for water conservation and retention. Consider the use of lower embodied energy 'green' concrete and other low embodied energy materials. Provide an analysis of the proposed development demonstrating how the proposed development has been oriented, designed and sited to make the best use of the natural ventilation, daylight, and solar energy.

Natural ventilation, cross ventilation & natural light – The proposed sketch plans include an internal courtyard in the middle of the building to the north-west site boundary. The walls of the proposed courtyard provide external envelope to glean natural ventilation and light, and the space planning could be optimised to provide the office, toilet, & kitchen spaces with external windows for natural ventilation & light. Also consider if the car lift could be relocated to give more external envelop from the courtyard to habitable rooms?

The proposal appears to be including air-conditioning, and it was explained at the Pre-Lodgement Meeting that this acts as a de-humidifier for the car collections and will be connected to solar panels to make them energy neutral. Full details of the system and operation and how it is net-neutral for energy use will be required. Detail of all the environmentally sustainable, and energy conservation features proposed should be provided.

### Conclusion

In conclusion, Urban Design may be in a position to support the proposal if the above issues are addressed, and the following information supplied:

- A reference design that complies with setback controls.
- A reference design that carefully considers the building bulk, mass, and scale relationship to the low-density residential to the north of Bassett Street.
- A reference design natural ventilation analysis that addresses the issues raised in this report.
- A survey.



### Specialist Advice

- Streetscape elevations to include 65-75 Bassett Street looking south; 8, 2-18, & 69 Tengah Crescent looking north-west.
- A long section from 2-18 & 69 Tengah Crescent through 1 Paul Close to illustrate the vertical relationship between the subject site, the neighbour to the south and the residential area to the north of Bassett Street.
- Comprehensive context & site analysis identifying the character of the area; Site Analysis is an active, coordinated design exercise that needs to convey information graphically as a meaningful explanation of physical conditions, considerations and challenges, special qualities, and coordinated with consultant inputs as a connected spatial exercise rather than a simplified 2-dimensional pictogram information. Consider: - Connection to Country – Topography - Public domain and ground plane - Water as a natural and connected system – Tree Canopy and deep soil and natural and connected systems - Spatial arrangement and hierarchy - Vehicular movement and pedestrian access – How pedestrian amenity & safety is ensured – How the existing vehicle entries will be incorporated - Vegetation – Solar access.
- Flood analysis/study – which should feed into the context & site analysis.
- A public domain plan to illustrate any public domain improvements proposed.

### Traffic

I appreciate that this has been presented as a unique development, and therefore we can not specify at this stage the exact number of parking spaces required.

However, the Applicant should apply sections of the Pittwater21 DCP where applicable, with any variations to be based on the Roads and Maritime Services Guide to Traffic Generating Development or analysis drawn from surveyed data for similar development uses.

Consideration should be made within the development site for access and parking of all service vehicles for the site, staff, visitor parking, and parking for people with disabilities.

Council could consider any additional proposals such as a plan of management for operation of the facility, which will be assessed on merit.

It is recommended that access to the development be via a central two-way driveway (minimum 5.5m wide); or separate driveways (3m wide) for entry and exit, with clockwise circulation to access the showrooms and kiosk.

The car lift must be designed to cater for the largest proposed vehicle type. Swept paths are required to demonstrate access to the parking area on the ground floor, as well access to car lifts and from the car lift to parking areas within the showrooms.

### Development Engineering

- The method of stormwater disposal is to be in accordance with Council's Water Management for Development Policy. The policy is available in Council's web page. <https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/policies-register/water-management/water-management-development-policy/water-management-development-policy-aug2020.pdf>
- The driveway crossings are to be in accordance with one of Council's Vehicular Crossing standard profile available on Council's web page. <https://www.northernbeaches.nsw.gov.au/planning-development/permits-and->





### Specialist Advice

[certification/driveway-and-vehicle-crossings](#) The vehicular crossing dimensions are to be in accordance with Pittwater 21 DCP.

- Please refer to Flood team for comments regarding floor levels.

### Flooding

A detailed assessment can only be provided upon lodgement.

The development involves 4 units on three levels proposed to house car collections as well as a coffee shop on the ground floor. Entry to the site is proposed via two driveways on Tengah Cr and pedestrian access via Basset Street.

The ground level on the north eastern side of the building appears to be open.

The site is affected by the low and medium flood risk precinct. The Maximum 1% AEP and PMF Water Level is 3.43 m AHD and 3.72 m AHD. The 1% AEP level varies across the site with levels along Bassett St being higher than Tengah Cr (2.84 m AHD). The Maximum Flood Planning Level (FPL) (1% AEP level plus freeboard of 500mm) at the site is 3.93m AHD. It is recommended that a comprehensive flood information certificate be obtained via <https://www.northernbeaches.nsw.gov.au/council/forms/flood-information-report-application>.

The proposed ground floor is at 3.46m AHD which is below the FPL.

A Flood Management Report is required to demonstrate that the proposed works can meet flood controls in Pittwater 21 DCP. The following controls may apply to the site as per Council's flood matrix Clause B3.11:

- A1, A2, B1, B2, B3, C1, C3, C7, D5 and D6

#### B3.12 Climate Change (Sea Level Rise and Increased Rainfall Volume)

This control requires climate change to be included in the FPL and applies where 'intensification of development' is proposed. 'Intensification of development' includes but may not be limited to:

- an increase in the number of dwellings (but excluding dual occupancies and secondary dwellings);
- an increase in commercial or retail floor space.

### Environment and Health

#### **Acid Sulfate Soils**

The premises is located in a Class 3 area for acid sulfate soils. Acid sulfate soils in a class 3 area are likely to be found beyond 1 metre below the natural ground surface. Any works that extend beyond 1 metre below the natural ground surface, or works which are likely to lower water table beyond 1 metre below the natural ground surface, will trigger the requirement for assessment and may require management.

The summary of proposed works advised the following regarding acid sulfate soils:

*The site is identified as containing Class 3 acid sulfate soil.*



### Specialist Advice

*As the works will not lower the water table below the 1 metre Australian Height Datum, an acid sulfate management plan is not required.*

The plans however indicate that a car lift will be installed. Given that lifts often require space below the ground surface for the lift shaft there is the potential that works will extend 1 metre below the natural ground surface. As such, the applicant will need to confirm if any works are occurring beyond 1 metre below the ground surface. If this is the case, to support any submitted application, Environmental Health recommends that an acid sulphate soils assessment be completed by a suitably qualified and experienced environmental consultant that is in accordance with the Acid Sulfate Soils Manual 1998 (ASSMAC) and the National Acid Sulfate Soil Guidance 2018.

If results of the acid sulphate soils assessment indicate that management of the acid sulfate soils is required then an acid sulfate soils management plan will be required most likely prior to the issuing of a Construction Certificate.

### Noise

From the PLM meeting, Environmental Health understands the following:

- The building is likely to be naturally ventilated with some individual AC units.

As there are residential receivers across the road, Environmental Health recommends an acoustic assessment be undertaken by a suitably qualified and experienced acoustic consultant. This will allow some flexibility if increased ventilation is required during the detailed design phase of the building as the acoustic assessment will have already been completed.

From the PLM meeting and a review of the plans, there is an upstairs members lounge and balcony for use by the owners of the storage units. There are concerns that the inappropriate use of this area could cause amenity concerns on residential receivers across the road. As such, Environmental Health recommends that the intentions/use of this area are made clear in the submitted Statement of Environmental Effects and that a Plan of Management is submitted with the application on how this area will be used and how any impacts on residential receivers across the road will be mitigated.

### Food

Any kitchens used for the preparation of food for sale as defined under the Food Act 2003 will need to comply with the requirements of AS 4674 Design, construction and fit out of food premises.

Mechanical ventilation will also need to comply with:

- AS 4674–2004 Construction and fit-out of food premises;
- Food Standards Code; and
- Australian Standard (AS) 1668.2 “The use of ventilation and air-conditioning in buildings.

The above requirements will be conditioned as part of the DA.

### Contaminated Land

As the site is industrial and the history of potential contamination is unknown for the site, to support any submitted application, Environmental Health recommends that a Preliminary Site Contamination report be submitted with the application.



### **Specialist Advice**

The report is to be prepared by, or reviewed and approved, by a certified consultant as defined under NSW EPA Contaminated Land Consultant Certification Policy. The investigation is to be in accordance with relevant industry guidelines including SEPP 55 and NSW EPA guidelines.

If the Preliminary Site Contamination Investigation determines that there is the potential for contamination to be present, a Detailed Site Investigation will then need to be conducted and submitted with the application.

The report is to be prepared by, or reviewed and approved, by a certified consultant as defined under NSW EPA Contaminated Land Consultant Certification Policy. The investigation is to be in accordance with relevant industry guidelines including SEPP 55 and NSW EPA guidelines.

If the Detailed Site Investigation identifies that contaminated material is required to be remediated/removed from site a Remedial Action Plan (RAP) will also need to be prepared. The RAP must be prepared in accordance with the relevant guidelines and legislation including Managing Land Contamination Planning Guidelines, SEPP 55–Remediation of Land and NSW EPA Guidelines including Guidelines for Consultants reporting on contaminated Land.

### **Coast and Catchment**

The proposed development has been reviewed by the Catchment's team in regard to water quality management. The development has a site area of under 1000m<sup>2</sup> and therefore has to comply with Council's Water Management of Development Policy, in particular Section 3.0 General Requirements, Section 4.3 Erosion, Sediment and Pollution Control, Section 5.0 Disposal of Stormwater, Section 7.0 Water Conservation, and Section 9.0 Onsite Stormwater Management.

### **Documentation to accompany the Development Application**

- Lodge Application via NSW Planning Portal
- Statement of Environmental Effects
- Clause 4.6 Variation
- Scaled and dimensioned plans:
  - Site Plan;
  - Floor Plans;
  - Elevations; and
  - Sections.
- Certified Shadow Diagrams (depicting shadows cast at 9am, Noon and 3pm on 21 June).
- Cost of works estimate/ Quote
- Survey Plan (Boundary Identification Survey)
- Site Analysis Plan
- Demolition Plan
- Excavation and fill Plan
- Waste Management Plan (Construction & Demolition)
- Driveway Design Plan (if any change is proposed to the driveway)
- Erosion and Sediment Control Plan / Soil and Water Management Plan
- Stormwater Management Plan / Stormwater Plans and On-site Stormwater Detention (OSD) Checklist
- Operational Management Plan
- BCA Report
- Access Report



- Phase 1 Contamination Report (and phase 2 if recommended by Phase 1 assessment)
- Traffic and Parking Assessment
- Flood Impact and Risk Assessment Report
- Acid Sulphate Soils Assessment
- Acoustic Report
- Landscape Plan
- Strata subdivision plan (if strata subdivision proposed)
- Photomontage

#### **IMPORTANT NOTE FOR DA LODGEMENT**

Please refer to the Development Application Lodgement Requirements on Council's website (link details below) for further detail on the above list of plans, reports, survey and certificates.

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/pdf-forms/development-application-da-modification-or-review-determination/2060-da-modification-lodgement-requirements-mar21.pdf>

The lodgement requirements will be used by Council in the review of the application after it is lodged through the NSW Planning Portal to verify that all requirements have been met for the type of application/development.

#### **Concluding Comments**

These notes are in response to a pre-lodgement meeting held on 9 August 2022 to discuss Demolition and construction of a three storey vehicle storage facility and take-away café at 69 Bassett Street Mona Vale. The notes reference the plans prepared by MHDP Architects dated June 2022.

The proposal looks to be capable of contributing a high quality building to the IN2 Zone and the proposed use as a storage premises is generally supported. The applicant should note Council's comments regarding the function area and whether this is an appropriate use in the IN2 zone.

The 20% breach to the FSR is of concern and the applicant would need to provide Council with very sound 'environmental planning grounds' within the Clause 4.6 variation request to warrant such a breach to the development standard and a highly considered design that minimises the visual bulk of the building through articulation and landscaping. The applicant must also consider that this site has an interface with the R2 Low Density Zone and therefore the bulk, scale and volume of the building is of importance in responding to the site context and providing an appropriate fit. In this regard, the non-compliant floor space may contribute to the building bulk and make it difficult for Council to form the positive opinion that the objectives of the development standard have been achieved, notwithstanding the non-compliance, as is required by Clause 4.6.

It would therefore be recommended that the overall FSR of the building is reduced as the design development continues.

The proposal requires further refinement in line with the above comments in order to gain Council's support. It is recommended the proposal be amended in line with the comments in these notes prior to lodgement.

Also of note, the application will be referred to the Northern Beaches Design Sustainability Advisory Panel upon lodgement. The applicant could also submit another pre-lodgement



Concluding Comments
application (once the design has been further refined) and elect to have the proposal referred to the DSAP through the pre-lodgement process.
Question on these Notes?
Should you have any questions or wish to seek clarification of any matters raised in these Notes, please contact the member of the Development Advisory Services Team at Council referred to on the front page of these Notes.