

12 August 2025



Goodman Property Services
1-11 Hayes Road
ROSEBERY NSW 2018

Dear Sir/Madam,

Development Application No: DA2025/0533 for Demolition of existing building and structures, construction of self-storage units and warehouse and associated uses at 14 Aquatic Drive FRENCHS FOREST.

An assessment has been undertaken of your application. The assessment has found that it is unsatisfactory in its current form for the reasons identified below:

Urban Design and Built Form

The proposed development that was subject to the Pre-lodgement Meeting (PLM) in July 2024 had several great design elements that visually reduced the bulk of the development when observed from Warringah Road. These design elements included:

- visual breaks within the northern façade to provide viewpoints through the development,
- the use of high-quality external finishes, and
- the use of building articulation along the entirety of the northern façade.

While there have been improvements to the design to enhance employee and pedestrian amenity, the proposed development that is subject to Development Application No. DA2025/0533 has removed several great design qualities that were proposed during the PLM and now provides a standard warehouse building typology with minimal building articulation and lower quality external finishes.

Furthermore, the re-orientation of the warehouse units on the second floor has removed the central breaks in the built form along the northern façade, which has resulted in an 85.2 metre (m) long façade with minimal building articulation and physical breaks in the built form.

Consequently, this will result in a visually dominant building when observed from Warringah Road, which is compounded by the following issues:

- non-compliance with the 30m front boundary setback control to Warringah Road under the Warringah Development Control Plan 2011 (WDCP), noting that the development proposes a varied front setback between 8.08m – 15.086m is proposed,
- non-compliance with the landscaped open space and site coverage controls under the WDCP, and



- the inadequate landscape planting within the Warringah Road front setback area, which is not sufficient to appropriately screen and soften the built form (i.e. Planning for Bush Fire Protection 2019 allows greater canopy coverage within the Asset Protection Zone than what is currently proposed – refer to Landscape Officer comments).

Council is not satisfied that the development, as currently proposed, satisfies the following objective of the SP4 Enterprise zone:

- *To create business environments of high visual quality that relate favourably in architectural and landscape treatment to neighbouring land uses and to the natural environment.*

The Design and Sustainability Advisory Panel (DSAP) have also raised concerns in relation to the design of the Development Application (the DSAP Report will be made publicly available shortly). The DSAP have provided several recommendations in relation to the built form, landscape design, sustainability and amenity, which correlate with the issues raised above.

You are required to amend the design to address the issues raised above, including the issues raised within the DSAP Report. An addendum to the Statement of Environmental Effects is also required to assess how the amended scheme has responded to the advice from Council and the DSAP.

Landscape Design

Council's Landscape Officer has reviewed the application and raised the following concerns in relation to the landscape design:

"It is noted in the bushfire report that the entire site is to be maintained as an Inner Protection Area (IPA) which limits canopy coverage to 15%. Drawing 'Deep Soil & Canopy Cover' (page 8 of the landscape plans) indicates the proposed canopy cover is 10%. The proposed 10% would allow an additional 5% or 773m² of canopy coverage while remaining in compliance with the IPA requirements. If it is assumed that a small tree would have a 6 metre (28m²) spread at maturity and a medium tree would have a 8 metre (50m²) spread at maturity, an additional 15 - 27 trees (approximately) could be installed within the site. It is noted the main road setback remains non-compliant and it is suggested that these additional trees be installed in the main road setback in order to provide additional softening to the built form. Small to medium (6-12m high) fire retardant species should be utilised to ensure canopies do not mature to a height/spread that could overhang the built form. The additional tree planting shall be arranged with regard to the IPA requirements (tree canopies separated by 2-5 metres etc.). Reliance on vegetation in the road reserve to soften the built form is not an acceptable outcome.

Furthermore to the above comments, it is noted that there is an existing area of hardstand between the existing substation and the western boundary in the front northern setback. Drawing 'Planting Plan' (page 13 of the landscape plans) shows majority of this area as existing vegetation to be retained. As there is no vegetation in the area of existing hardstand please update the plans to show the proposed landscape treatment and outcome, and include additional tree planting with reference to the comments above.



Please provide updated landscape plans addressing these concerns”.

You are required to amend the application to resolve the concerns raised by Council's Landscape Officer. Please confer with Council's Landscape Officer, Torin Calf, via 1300 434 434 if you have any questions in relation to the Landscape Officer referral advice.

It is also noted that the proposal only provides 24.68% of the site as landscaped open space (LOS), which does not meet the WDCP requirement of 33.3%. Additional planting that is commensurate with the scale of the development (and the requirements of Planning for Bush Fire Protection 2019) is required for Council to consider a variation to the WDCP LOS requirement.

Traffic, Access and Parking

Council's Traffic Engineer has reviewed the application and raised the following concerns with respect to the off-street parking provision and vehicular access:

Vehicle Access and Parking

“The TA (note: this refers to Traffic Assessment) relies on a Parking and Traffic Study conducted by Stantec on behalf of the Self Storage Association of Australia 2022/23, and includes a Summary Table of the recommended parking rate provision based on the facility size. The results of the Study however must be read in context with the methodology and additional information provided.

Council's Transport Network team are generally of the opinion that the required number of spaces for the development is more closely correlated with the number of units provided as this creates the need for the vehicle trip rather than the size of the area. Council has found in the past that the Stantec study is too broad and would underestimate the required number of parking spaces as it does not consider the different types of self-storage units. However, in this instance the ranch style facilities provides parking aisles wide enough for vehicles to maneuver (sic) and park next to the storage units and therefore the number of parking spaces provided is considered adequate.

The Ground Floor provides 145 self-storage units ranging in size between 20-64m². It may be expected that some of these units would require access for vehicles larger than a B99 vehicle. The Architectural plans appear to show that SRV could be possible. The following suggestions are recommended with respect to the parking and access:

Ground Floor

- *Provide SRV access for Ground Floor self-storage units. Check vertical clearance min 3.5m for access and dimensions 3.5m wide x 6.4m long for loading bay.*
- *Proposed Wash Bay could also serve as a Loading Bay.*
- *Remove SSG.63 (24m²) and replace with Loading Bay for SRV access (3.5m x 6.4m).*
- *Due to size of the site which is over 100m wide and the large number of storage units within the facility, it is recommended that a second Loading Bay be provided for SRV access at the opposite end of the site. A suitable location would be at the*



south-east corner of the Ground Floor, with the removal of SSG.63. This location would also provide good amenity to SSG.62 (64m²) which is the largest self-storage unit for the development, and many of the larger units which are also located nearby. Alternatively, the north-east corner may be considered for a Loading Bay, however it would require removal of a larger unit and has a smaller access area.

- Reconfigure parking space Nos.37-39 to provide 3 accessible parking spaces near the access driveway to the car park.

L1 Floor

- All self-storage units located on L1 must be allocated an individual car park space in order to maintain MRV manoeuvring and access to Loading Zones.
- At least one parking space is to be allocated to each Warehouse Unit on L1.
- WH1.07 appears to have two Loading Zones (3.5 x 7.7m). The Loading Zone adjacent to the Fire Exit and closest to SS1.04 should be a dedicated Loading Zone provided for shared use between the self-storage units located on L1.

L2 Floor

- At least one parking space is to be allocated to each Warehouse Unit on L2.

Bicycle Parking and End of Trip Facilities

"The TA refers to the NSW Planning Guidelines for Walking and Cycling for bicycle parking requirements, which recommends industrial and warehousing rates for staff (3-5%) visitor (5-10% of staff). The TA estimates 20 staff for the 153 self-storage units and 31 staff for the 72 warehouse units (including mezzanine). Considering the number of warehouses units it would seem that 31 is a gross underestimate of staff. This is because the TA applies a warehouse rate of 226m² per employee, which is mostly applied to a large warehouse facility. The proposed warehouse units range for this site range between 49-99m², which all include a mezzanine level for administration and office space. The warehouse units would therefore likely accommodate 1-2 staff.

With respect to end of trip facilities, the TA specifies that 2 shower cubicles and 8 lockers have been provided on the basis of 10 bicycle parking spaces. Section C3(A) of the Warringah DCP 2011 requires bathroom/change areas including toilet, wash basin etc. and a minimum of 1 shower cubicle per 7 required bicycle parking spaces and 1 clothes locker per bicycle parking space. In the absence of actual staff numbers Council would consider that 8 staff bicycle parking spaces and 8 visitor parking spaces would be appropriate for the development. The proposed 2 shower cubicles is (sic) sufficient however must also include the required bathroom/change areas as well as 8 lockers.

The proposed bicycle racks for 8 spaces outside the building can be retained for visitor parking. However, the staff bicycle parking must be stored in a secure room/enclosure and there is sufficient space within the lobby between the lift and the bathroom".

Council's Traffic Engineer has provided the following recommendations to overcome the issues in relation to bicycle parking and end of trip facilities:



- *“Provide two rows of 4 bicycle parking spaces (2 two-sided parking rails in each row). The bicycles rails should be spaced 1m apart, with the first rail in each row offset 0.5m from the wall, separated by a minimum 1.5m aisle (AS2890.3 Bicycle Parking - Figure B5(a) Multiple row parking with single aisle)*
- *Alternatively, provide 8 vertical bicycle racks (Figure B7 Wall mounted vertical bicycle parking). Each rack is to be spaced 0.5m apart, with a 1.5m aisle provide for access”.*

Biodiversity Impacts

Council's Biodiversity and Landscape Officers have raised concerns with respect to impacts on vegetation within the Biodiversity Values Mapped (BVM) area on 431 Warringah Road.

The following comments with respect to the potential encroachment into the BVM area are provided by the Landscape Officer:

“Drawing DA30 and DA35 Section 02 of the Civil Engineers drawings shows considerable fill and retaining wall construction in the area of the fire truck parking and MRV turning circle, along the southern boundary in this location. It is noted the retaining wall and fill will be atop an area of existing garden bed that appears contiguous with the neighbouring property. It is unclear what, if any, impact will occur to neighbouring trees and vegetation mapped as biodiversity values. It appears the land falls lower to the south and the required footing may impact upslope roots of neighbouring trees. Please provide arboricultural comment that these proposed works are acceptable with regard to the retention of the neighbouring trees/vegetation”.

It is noted that a Biodiversity Development Assessment Report (BDAR) and written landowner's consent from the owners of 431 Warringah Road would be required if any trees within the BVM area on the adjoining site cannot be retained. Please note that this would not guarantee Council support.

Council's Biodiversity Officer has also provided the following comments in relation to the proposed species selection within the planting schedule:

A landscape proposal has been submitted with the proposal including a planting schedule that will need to be amended to ensure inclusion of species that are consistent with the objectives of the applicable controls. A number of species inconsistent with the Duffys Forest Endangered Ecological Community have been included in the submitted landscape plan”.

Please confer with Council's Biodiversity Officer, Pierre Vignal Atherton, via 1300 434 434 if you have any questions in relation to the Biodiversity Officer referral advice.

Noise Impacts

Council's Environmental Health Officer has raised the following concerns in relation to potential noise impacts and the proposed mitigation measures:



"The acoustic report provided, whilst quite detailed and thorough to a degree, provides a number of variable factors in relation to "operational noise mitigation options". The variable factors do not provide a definitive to conclusions as to what mitigation options will be undertaken to control noise emissions.

These options include such things as specifications of acoustic enclosures/louvres for condensers, use of broadband and/or ambient sensing alarms on forklifts and trucks, and manufacturing plant or other noisy equipment which may or may not be required by building tenants.

Without such assurances as to what noise mitigation measures will be require/implemented, Environmental Health does not support the proposal".

You are required to update the Noise Impact Assessment to address the concerns raised by Council's Environmental Health Officer (EHO).

Please confer with Council's EHO, Paul Melrose, via 1300 434 434 if you have any questions in relation to the EHO referral advice.

Stormwater Management

Council's Development Engineer has requested the following information in relation to the proposed stormwater management scheme and impacts on Council's Stormwater Infrastructure:

"1. The site is burdened by a Council stormwater pipe (1050 RCP). The applicant is asked to undertake the following work:

A. Accurately locate, confirm dimensions including depth and plot to scale Council's Public drainage system and associated infrastructure on the DA site plans that outline the proposal. This should be carried out by service locating contractor and registered surveyor. (Evidence of methodology adopted used for locating stormwater system should be provided). Show the stormwater pipe on the civil plans and produce a longitudinal section.

B. All structures are to be located clear of any council pipeline, pit or easement and comply with minimum vertical and horizontal clearances.

C. Show a plan of Council's pipe on the subject property, including all proposed and existing pits.

2. Civil plans by Costin Roe dated 23.04.25.

A. The on-site detention system needs to be sized in accordance with Council's Water Management for Development Policy. Refer to sections 9.3.2 Onsite Stormwater Disposal Requirements Region 2 Central Catchments, 9.3.2.5 Full Computation Methods, 9.3.2.6 Pre and Post Development Runoff for Full Computation Method of the policy. Modelling is to be undertaken in accordance with ARR2019 methodology, utilising an initial-continuing loss hydraulic model. Provide a DRAINS model to Council for perusal.



B. Provide detailed drawing of the proposed on-site detention system. The design should include a minimum of two cross-sections, including a section through the proposed discharge control pit.

C. With reference to drawing C09431.01-DA40 rev C, provide a longitudinal section of the proposed connection from the OSD basin to Council's 1050RCP. The centre line of the orifice should be a minimum of 200mm above the obvert of the receiving pipe (1050RCP).

D. All proposed connections into Council pipe should be as high as possible. Provide longitudinal sections for all connections into Council pipe. Crossing services such as the sewer main should be potholed and surveyed. Provide minimum 1% fall on pipes.

E. Provide a catchment plan for the OSD basin.

F. Drawing C09431.01-DA36. Show Council's surveyed stormwater pipe on cross-sections.

G. Drawing C09431.01-DA55. Lift proposed pipe (450RCP) on both the upstream and downstream ends. Pipe should be as high as possible (maximum of 200mm from underside of sewer). Provide Sydney Water concurrence.

H. Provide a safe overland flow path in the event of orifice blockage”.

Please confer with Council's Senior Development Engineer, Matthew Makomaski, via 1300 434 434 if you have any questions in relation to the Development Engineering referral advice.

Insufficient Information

The following information/documentation is required to complete the assessment of the application:

1. **Landowner's Consent from 9 Tilley Lane**

The proposed pedestrian pathway within the north-western corner of the site encroaches into 9 Tilley Lane. Written landowners consent from the Strata Body of 9 Tilley Lane has not been provided for this encroachment.

2. **Easements**

The site is burdened by several easements. An addendum to the Statement of Environmental Effects (SEE) that outlines the terms of each easement and assesses the impacts of the development on each easement must be submitted.

The addendum to the SEE must demonstrate how the development conforms to the terms of each easement and outline whether any easements would need to be modified or extinguished (i.e. the development removes an electrical substation on the site and a new substation and associated easement is not shown on the plans).

3. **Access Gate**



An access gate at the front of the site labelled as 'sliding gate' is shown on the plans. The plans do not demonstrate whether the access gate is the existing gate or a new proposed gate. If the gate is a new proposed gate, then the plans must clarify the height of the gate and the chosen materials of the gate.

4. Gross Floor Area of Existing Building – Housing and Productivity Contribution Order

The development is subject to the Housing and Productivity Contribution Order. Council is unable to calculate the contributions that will be levied pursuant to this Order, as the gross floor area of the existing building has not been identified. This information must be provided.

5. Sprinkler Tank and Pump Room

The plans do not include details in relation to the height and dimensions of the pump room and sprinkler tank or the volume of the sprinkler tank. This information must be provided.

6. Strata Subdivision

The SEE outlines that the units will be strata subdivided. Please confirm if strata subdivision is proposed under the current Development Application (DA), or whether this will be sought as part of a separate planning pathway or separate DA.

Options available to the Applicant

Council is providing you with two (2) options to progress your application:

1. Prepare and submit further supporting information/amendments to address the above issues. Please carefully read the below advice if you choose this option.
2. Request that the current proposal proceed to determination in its current form, which may result in refusal of the application.

Please advise of your selected option by responding **within 7 days of the date of this letter** by email sent to council@northernbeaches.nsw.gov.au marked to the attention of the assessment officer. Should Council not receive your response by this date, Council will determine the application in its current form.

Submitting further information/amendments

Council will offer **one** opportunity to provide feedback on conceptual amendments addressing the issues raised in this letter. We strongly request that you contact the assessment officer directly for a 'without prejudice' discussion on your proposed resolution of the issues and the submission requirements **before** lodging any documentation on the NSW Planning Portal.

Conceptual amendments must be provided to Council for feedback by 1 October 2025. This deadline has been extended while the assessment officer (Tom Burns) is on leave. If conceptual amendments are deemed sufficient, we will then provide you with a timeframe upon which an amended application is to be lodged on the NSW Planning Portal (generally 14 days).



Please ensure that the amended/additional information submitted on the NSW Planning Portal is a genuine attempt to resolve the issues as Council will generally not seek any further information/amendments after that point. Council will proceed to assess and determine the application based on the submitted information without further consultation. Whilst we will provide feedback on your conceptual amendments in good faith, this cannot guarantee the approval of the amended application.

As part of any amended application, it may be necessary to update your supporting documentation (e.g., BASIX certificate, bushfire report, geotechnical report, etc.). Failure to do so may affect Council's ability to determine the application favourably.

Please ensure that any amendments are accompanied by a summary/schedule of amendments cover sheet.

Council reserves its right under section 37 of the *Environmental Planning and Assessment Regulations 2021* not to accept any information/amendment if it is not considered to be a genuine attempt to resolve the issues. In which case, Council will inform you that the changes have not been accepted and the application will proceed to be determined.

This process has been established to ensure an efficient and responsible level of service which meets the requirements of the Department of Planning and Environment's *23A Guidelines on withdrawal of Development Applications 2023*, Ministerial Orders *Statement of Expectations 2021* and the *Development Assessment Best Practice Guide 2017*.

As per the requirements of section 36 of the *Environmental Planning and Assessment Regulation 2021*, you are advised that 77 days in the assessment period have elapsed.

This letter will be released on Council's webpage as part of the application's documentation.

Should you wish to discuss any issues raised in this letter, please contact the undersigned on 1300 434 434 during business hours Monday to Friday. Please note that the assessment officer (Tom Burns) will be on extended leave between 16 August and 1 October 2025. During this time, you are advised to contact Claire Ryan (the Acting Manager until 5 September 2025) or Steve Findlay (the Development Assessment Manager) after 8 September 2025.

Yours faithfully

Tom Burns
A/Manager, Development Assessments