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Clause 4.6 Variation Request to the Height of Buildings Development Standard under Clause 4.3 of Tweed LEP 2014

Civil works, vegetation removal, construction and use of a building for
Hardware and Building Supplies and associated car parking,
landscaping, signage, habitat restoration and vegetation management

42 and 44 Enterprise Avenue and 13-17 Corporation Circuit,
Tweed Heads South

Prepared for: Calardu Tweed Heads Pty Ltd
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1 Introduction

1.1 Commission

DFP Planning Pty Ltd (DFP) has been commissioned by Calardu Tweed Heads Pty Ltd to prepare a written request ("Variation Request") pursuant to cl4.6 of *Tweed Local Environmental Plan 2014* (the LEP) for the proposed hardware and building supplies development at 42 and 44 Enterprise Avenue and 13-17 Corporation Circuit, Tweed Heads South (collectively, the Site).

The proposed hardware and building supplies development comprises:

44 Enterprise Avenue (No. 44)

- Site preparation including some vegetation removal, earthworks and stormwater drainage works;
- Construction and use of a hardware and building supplies building comprising a single storey trade floor with a gross floor area (GFA) of 17,581.35m² and an additional 1,412.97m² of outdoor shaded plant nursery;
- Mezzanine ancillary office space;
- Undercroft car parking for 518 vehicles;
- Customer, trade and loading vehicular ingress and egress via Enterprise Avenue;
- Landscaping including Koala habitat restoration and vegetation management; and
- Business identification signage.

42 Enterprise Avenue (No. 42)

- Koala habitat restoration and vegetation management.

13-17 Corporation Circuit (Corporation Circuit)

- Advertising and directional signage.

The proposed hardware and building supplies building at 44 Enterprise Avenue does not comply with the 10m Height of Buildings development standard under cl4.3 of the LEP. The maximum height is 15.52m to the top of the roof ridge over the main entry to the building.

Notwithstanding the contravention of the development standard, it is considered that:

- Compliance with the standard is unreasonable and unnecessary in the circumstances of the case (cl4.6(3)(a));
- There are sufficient environmental planning grounds to justify the contravention (cl4.6(3)(b)); and
- The proposed development is in the public interest because it is consistent with the objectives of the development standard and is consistent with the objectives of the E4 General Industrial Zone (cl4.6(4)(a)(ii)).

The site specific planning grounds to justify the contravention of the Height of Buildings development standard include:

- ensuring the proposed building complies with flood controls;
- limiting unnecessary excavation and transport of soil off-site;
- locating car parking beneath the building in an undercroft to minimise urban heat gain;
- maximising landscaping and vegetation retention/restoration on the land; and
- that there are no significant adverse environmental amenity impacts arising from the proposal.

1 Introduction

The consent authority or the Court can assume the concurrence of the Secretary pursuant to the Notice issued on 21 February 2018 and can exercise its power pursuant to cl4.6(2) to grant development consent to the proposed development notwithstanding the contravention of the development standard.

Accordingly, this written request can be relied upon by the consent authority or the Court when documenting that it has formed the necessary opinions to satisfy the provisions of cl4.6(4) of the LEP.

2 The Nature of the Variation

Clause 4.3 and the Height of Buildings Map of the LEP designate a maximum building height of 10m for the land at 44 Enterprise Avenue. The LEP defines 'building height' as:

- (a) *in relation to the height of a building in metres—the vertical distance from ground level (existing) to the highest point of the building, or*
 - (b) *in relation to the RL of a building—the vertical distance from the Australian Height Datum to the highest point of the building,*
- including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.*

The proposed building will exceed the 10m limit with the extent of the non-compliance generally described as follows:

- The roof ridge over the main entry is at RL 21.22m, which is 15.52m above the natural ground level below at RL 5.7m (i.e. a variation of 5.52m);
- The top of the parapet wall surrounding the main roof of the building is at RL 20.95m, which is 15.25m above the natural ground level below at RL 5.7m (i.e. a variation of 5.25m); and
- The roof ridge of the main roof of the building is at RL 20.549 which is 14.85m above the natural ground level below at 5.7m (i.e. a variation of 4.85m).

Michael Carr Architects has prepared a 3D building envelope diagram which maps the 10m height control relative to the proposed building. Various points around the building have been annotated to explain the height. A copy of the 3D plan is included at **Attachment 1**.

The design rationale of the building and operational requirements is relevant to understanding why the building has exceeded the building height development standard:

- The design approach been informed by the strategy to maximise the retention of existing vegetation and allow for its restoration. This design objective has been a key factor in locating the car parking under the building as an undercroft rather than at grade car parking. It also has guided the proportions of the warehouse component of the building resulting in deep dimensions (rather than a longer and narrower building form).
- The proposed carpark level is RL5.95m which is above the FPL and PMF. If the proposed undercroft carparking was designed as a basement carpark to achieve compliance, it would require at least 5m of excavation below the existing ground level which would place the basement below the FPL and the PMF which is not considered a desirable or acceptable outcome for any development of the land. The design approach of using undercroft parking also avoids at grade external carparking which would result in more hard surfaces and a poorer design outcome.
- The undercroft car parking area has an internal clearance of 4.5m. This comprises 3.3m clearance for vehicles which is necessary for trades vehicles, loading roof racks and also to accommodate vehicles that might have roof mounted wheelchairs (which require a minimum 2.5m height clear of services). An additional 1.2m is required for services mounted on the underside of the slab above. The 3.3m clearance ensures that any roof top storage on vehicles is clear of risks of damaging services. This sets the warehouse level at RL10.45m.
- The main warehouse level utilises a racking system of up to approximately 6.5m in height which requires additional clearance above that height to operate forklifts and store goods on the upper level of the racks. Services are accommodated above this height and this forms the pitching point for the main roof.
- The main roof is designed with a shallow 3 degree pitch with a central ridge. The footprint / proportions of the main warehouse level is designed to manage the biodiversity offset requirements and landscaped area around the building. This has

2 The Nature of the Variation

resulted in a building which has deep proportions. The deep proportions and roof pitch results in the overall ridge height of RL 20.549.

- The parapet is wrapped around the perimeter of the building to conceal the roof and ridge as well as hide roof plant and is set at RL 20.950.
- The apex/gable at the main entry is designed to project slight above (270mm) the parapet level (RL 21.220) to provide definition to the apex so that it does not blend with the parapet.

3 Clause 4.6 Assessment

3.1 Clause 4.6(1) - Objectives

Clause 4.6(1) of the LEP states the objectives of the clause as follows:

- (a) *to provide an appropriate degree of flexibility in applying certain development standards to particular development,*
- (b) *to achieve better outcomes for and from development by allowing flexibility in particular circumstances.*

In the Judgment of *Initial Action Pty Ltd v Woollahra Municipal Council* [2018] NSWLEC 118 (“Initial Action”), Preston CJ ruled that there is no statutory provision that requires the applicant to demonstrate compliance with these objectives or that the consent authority be satisfied that the development achieves these objectives. Furthermore, neither cl4.6(3) nor cl4.6(4) expressly or impliedly requires that development that contravenes a development standard “*achieve better outcomes for and from development*”.

Accordingly, the remaining subclauses of cl4.6 provide the preconditions which must be satisfied before a consent authority or the Court may grant development consent to a development that contravenes a development standard imposed by an environmental planning instrument. These preconditions are discussed hereunder.

3.2 Clause 4.6(2) – Consent May be Granted

Clause 4.6(2) provides that:

- (2) *Development consent may, subject to this clause, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However, this clause does not apply to a development standard that is expressly excluded from the operation of this clause.*

The height of building control in cl4.3 of the LEP is a development standard, defined in Section 1.4 of the EP&A Act as follows (underline emphasis added):

development standards means provisions of an environmental planning instrument or the regulations in relation to the carrying out of development, being provisions by or under which requirements are specified or standards are fixed in respect of any aspect of that development, including, but without limiting the generality of the foregoing, requirements or standards in respect of:

...

- (c) *the character, location, siting, bulk, scale, shape, size, height, density, design or external appearance of a building or work*

Furthermore, the height of buildings development standard is not expressly excluded from the operation of cl4.6 (see **Section 3.7** and **Section 3.9**).

3.3 Clause 4.6(3) – Consent Authority to Consider Written Justification

Clause 4.6(3) relates to the making of a written request to justify an exception to a development standard and states:

- (3) *Development consent must not be granted for development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating:*
 - (a) *that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and*
 - (b) *that there are sufficient environmental planning grounds to justify contravening the development standard.*

This report and information referred to herein, constitute a written request for the purposes of cl4.6(3) and the following subsections address the justifications required under that subclause.

It will be a matter for the consent authority to consider this written request prior to granting development consent to the DA and when determining the DA, to enunciate that it has satisfied itself of the matters in cl4.6(4) as discussed in the Judgment of *Al Maha Pty Ltd v Huajun Investments Pty Ltd* [2018] NSWCA 245 (“Al Maha”).

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3.4 Clause 4.6(4)(a) – Consent Authority to be Satisfied

Clause 4.6(4) provides that consent must not be granted for development that contravenes a development standard unless:

- (4) *Development consent must not be granted for development that contravenes a development standard unless:*
 - (a) *the consent authority is satisfied that:*
 - (i) *the applicant's written request has adequately addressed the matters required to be demonstrated by subclause (3), and*
 - (ii) *the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out, and*
 - (b) *the concurrence of the Secretary has been obtained.*

The following subsections of this written request address these matters.

3.4.1 Clause 4.6(4)(a)(i) - Written request to adequately address the matters in cl4.6(3)

Clause 4.6(4)(a)(i) requires the consent authority to be satisfied that this written request adequately address the matters in cl4.6(3) as follows:

- (a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case; and
- (b) that there are sufficient environmental planning grounds to justify contravening the development standard.

Compliance is Unreasonable or Unnecessary

In his Judgment of *Randwick City Council v Micaul Holdings Pty Ltd [2016] NSWLEC 7* ('Micaul') Preston CJ confirmed that an established means of demonstrating that compliance with a development standard is unreasonable or unnecessary is to establish that a development would not cause environmental harm and is consistent with the objectives of the development standard. It is considered that the environmental impacts of the proposed development are appropriately minimised or mitigated as described in **Table 1**.

Table 1 Summary of Environmental Impact Management

Issue	Discussion
Views	<p>There are no significant views across the Site that will be lost as a consequence of the non-compliance or the proposed building more generally, noting that land north of the Site along Enterprise Avenue is industrial/commercial development and there are no nearby residential properties. In addition, views of the Site from the Motorway would be fleeting glimpses for passengers as the Motorway speed limit is 100kph and there are only small gaps between canopy trees along the southern side of the Motorway which enable views in the general direction of the Site.</p> <p>The perspective views prepared by Michael Carr Architects illustrate the potential view of the building from the small gap between canopy trees along the Motorway. These illustrate that the existing industrial/commercial development between the Motorway and the Site will obscure the lower part of the building. The upper section of the building (over 100m from the Motorway) is the part of the building that will be visible. The dark green colour of the building will to a certain extent merge with the green vegetation (not contrast) which will further limit the obviousness of the building to passenger travelling at speed along the Motorway.</p>
Solar Access	<p>The proposed building is to be located in an industrial zone with no nearby residential or other land uses sensitive to overshadowing and in any event, any shadows cast will generally be within the Site.</p>
Noise	<p>The proposal has been assessed in the Noise Impact Assessment by Acoustic Dynamics as not exceeding any maximum noise criteria.</p>
Traffic	<p>The height exceedance is a function of the undercroft car parking which in itself, does not contain any traffic generating floorspace. Even if this car parking were relocated into a basement or around the perimeter of the building, the floorspace would remain the same, albeit lower to the ground. In any event, the traffic impacts of the proposal have been assessment as being acceptable, subject to minor localised road intersection upgrades.</p>

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Table 1 Summary of Environmental Impact Management

Biodiversity	Whilst the proposal will result in a loss of some native vegetation (regrowth) this has been assessed as being acceptable subject to the retiring of ecosystem credits and implementation of a habitat restoration plan. If the undercroft car parking were to be relocated to the perimeter of the Site, the loss of vegetation would be greater and this is not considered to be an appropriate outcome or the orderly and economic development of the land.
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Furthermore, the proposed development is considered to be consistent with the objectives of the height of buildings development standard as described in **Table 2**.

Table 2 Assessment against the objectives of the Height of Buildings development standard

Objective	Assessment
(a) <i>to establish the maximum height for which a building can be designed,</i>	The proposed height exceedance does not alter the underlying height limit for the land or the E4 Zone more generally and this objective remains unaffected by the proposal. Notwithstanding that the proposal exceeds the limit set by the LEP, the subject land is capable of achieving a building height of greater than 10m as it is a large site, removed from contiguous developable land, not proximate to any residential or land uses that would be visually sensitive to the proposal and does not result in adverse amenity impacts as set out herein and within the SEE that accompanies the DA.
(b) <i>to ensure that building height relates to the land's capability to provide and maintain an appropriate urban character and level of amenity,</i>	The land is zoned E4 General Industrial and large and tall buildings are a feature of this zone. As indicated above, the context of this specific Site is one which is not typical of the broader locality given the surrounding land uses and the height exceedance will not result in significant adverse character or amenity impacts.
(c) <i>to ensure that taller development is located in more structured urbanised areas that are serviced by urban support facilities,</i>	The Site is already serviced with essential services and utilities and is well connected to the surrounding road network, noting that the proposal identifies several localised intersection improvements that will be required to be completed prior to occupation of the development.
(d) <i>to encourage greater population density in less car-dependant urban areas,</i>	This objective is not relevant to the proposal which is not a residential land use although the attainment of the objective on other land that is subject to a height control is not thwarted by the proposal.
(e) <i>to enable a transition in building heights between urban areas comprised of different characteristics,</i>	The Site does not represent a transition between any particular urban settings and strict adherence to the height limit in this instance would be contrary to the Site specific context.
(f) <i>to limit the impact of the height of a building on the existing natural and built environment,</i>	The detailed assessment of natural and built environmental impacts within this cl4.6 request, the SEE report and other specialist reports which accompany the DA, demonstrate that the impacts of the proposal can be minimised and mitigated and that the additional height is beneficial as it reduces the building footprint and maximises natural environmental outcomes.
(g) <i>to prevent gross overshadowing impacts on the natural and built environment.</i>	The proposed height exceedance will create additional overshadowing compared to a compliant development although any shadows cast will be predominantly within the site and not to any residential or other such land or significant public domain areas.

Accordingly, for the reasons identified above it is considered that strict compliance with the height of buildings development standard is unreasonable or unnecessary as the non-compliance will not cause environmental harm and the proposed development is consistent with the objectives of the development standard, notwithstanding the non-compliance.

Sufficient Environmental Planning Grounds

In the Judgment of *Four2Five Pty Ltd v Ashfield Council [2015] NSWLEC 1009* ("Four2Five") Pearson C indicated there is an onus on the applicant to demonstrate, through the written request, that there are "*sufficient environmental planning grounds*" such that compliance with

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the development standard is unreasonable or unnecessary. Furthermore, that the environmental planning grounds must be particular to the circumstances of the proposed development rather than public benefits that could reasonably arise from a similar development on other land.

In Initial Action, Preston CJ indicated that it is reasonable to infer that “*environmental planning grounds*” as stated in under cl4.6(3)(b), means grounds that relate to the subject matter, scope and purpose of the EPA Act, including the objects in s1.3 of the EP&A Act.

The site-specific environmental planning grounds that support the proposed variation to the height of buildings development standard in this circumstance include the following:

- **Flooding** - The land at No. 44 is subject to a flood planning level of RL 3.1m and a probable maximum flood (PMF) level of RL 5.7m. The proposed carpark level is RL5.95m which is above the FPL and PMF. If the proposed undercroft carparking were to be constructed as a basement carpark to achieve compliance, it would require at least 5m of excavation below the existing ground level which would place the basement below the FPL and the PMF which is not considered a desirable or acceptable outcome for any development of the land;
- **Excavation** – irrespective of the need to comply with flood provisions, the proposed development seeks to minimise the amount of excavation and the need to transport significant amount of material off the site. Whilst some excavation is required, the total volume of material required to be exported has been minimised which also minimises changes to stormwater conditions;
- **Urban Heat Gain** - locating car parking beneath the building in an undercroft is considered preferable to placing large expanses of hard surface around the perimeter of the building which would add to urban heat gain; and
- **Vegetation Retention/Restoration** – the condensing of the development footprint by locating the car parking under the building also maximising the ability to retain and revegetate/landscape parts of the Site. As explained in Section 2 the design objective to retain vegetation and allow for its restoration has influenced the building design which along with operational requirements for clearances for cars and racking systems has informed the building height.

In Micaul and Initial Action, Preston CJ also clarified that sufficient environmental planning grounds may also include demonstrating a lack of adverse amenity impacts. As summarised in **Table 1**, the proposal satisfactorily manages or mitigates adverse amenity impacts.

Accordingly, it is considered that there are sufficient environmental planning grounds to justify the contravention of the height of buildings development standard in this instance.

3.4.2 Clause 4.6(4)(a)(ii) – Public Interest

Pursuant to cl4.6(4)(a)(ii) and as discussed by Preston CJ in Initial Action, if the development is consistent with the objectives of the development standard and the objectives of the zone, the consent authority can be satisfied that the development will be in the public interest.

An assessment of the proposal against the objectives of the height of buildings development standard is provided at **Table 2** and an assessment of the proposed development against the objectives of the E4 General Industrial Zone is provide at **Table 3**.

Table 3 Assessment against the objectives of the E4 General Industrial Zone

Objective	Assessment
• <i>To provide a range of industrial, warehouse, logistics and related land uses.</i>	The proposal will provide a large, warehouse style retail uses which will support local industry through a broad range of products and services.
• <i>To ensure the efficient and viable use of land for industrial uses</i>	The proposal will utilise the Site for a permissible land use in an orderly and economic fashion.

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Table 3 Assessment against the objectives of the E4 General Industrial Zone

• <i>To minimise any adverse effect of industry on other land uses.</i>	The proposal will not generate any significant adverse impacts on surrounding land uses in terms of noise or traffic, subject to various mitigation measures.
• <i>To encourage employment opportunities.</i>	The proposal will retain the employment opportunities created by the existing Bunnings warehouse. Additional employment will be created through increased building and landscape maintenance and the larger floor area will allow greater choice in product lines providing for greater multipliers to local industry.
• <i>To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.</i>	The proposal will provide a broad range of facilities and services to meet the needs of businesses and workers in the area.

These assessments demonstrate that the proposed development is consistent with all the relevant objectives of the development standard to be varied and all the relevant objectives of the zone within which the development is to be carried out. Accordingly, it follows that the proposed development is in the public interest.

3.5 Clause 4.6(4)(b) –Concurrence of the Secretary

On 21 February 2018, the Secretary of the Department of Planning and Environment issued a Notice ('the Notice') under cl64 of the *Environmental Planning and Assessment Regulation 2000* (the EP&A Regulation) providing that consent authorities may assume the Secretary's concurrence for exceptions to development standards for applications made under cl4.6 of the *Standard Instrument – Principal Local Environmental Plan* or SEPP 1 subject to conditions.

The LEP adopts cl4.6 of the SILEP and therefore, that prerequisite of the Notice is met.

Condition 1 of the Notice is not relevant in this instance as the request does not seek to vary a development standard relating to minimum lot size.

Condition 2 of the Notice provides that concurrence may not be assumed by a delegate of the consent authority (i.e. a Council Officer) if the development will contravene a development standard by more than 10%. The proposed variation is greater than 10% and the Northern Regional Planning Panel may assume concurrence in respect of the variation requested to the height of buildings development standard.

Alternatively, the Court has power to grant development consent to the proposed development even though it contravenes the height of buildings development standard, without obtaining or assuming the concurrence of the Secretary by reason of s39(6) of the *Land and Environment Court Act 1979* (the Court Act).

3.6 Clause 4.6(5) - Concurrence Considerations

Notwithstanding that concurrence can be assumed pursuant to the Notice and notwithstanding the Court's powers under s39(6) of the Court Act, in Initial Action, Preston CJ clarified that the Court should still consider the matters in cl4.6(5) when exercising the power to grant development consent for development that contravenes a development standard.

The matters to be considered under cl4.6(5) are:

- (a) *whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and*
- (b) *the public benefit of maintaining the development standard, and*
- (c) *any other matters required to be taken into consideration by the Planning Secretary before granting concurrence.*

The proposed contravention of the height of buildings development standard has been considered in light of cl4.6(5) as follows:

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- The proposed non-compliance does not raise any matter of significance for State or regional environmental planning as it is specific to the design of the proposed building for this particular site and the nature of the variation does not trigger any requirement for substantial augmentation of regional or State infrastructure or services;
- As indicated above, the proposed contravention of the height of buildings development standard is considered to be in the public interest because it is consistent with the objectives of the zone and the objectives of the development standard. Accordingly, there would be no significant public benefit in maintaining the development standard in this instance; and
- It is considered that there are no other matters of relevance that need to be taken into consideration.

3.7 Clause 4.6(6) – Subdivision on Certain Land

Clause 4.6(6) is not relevant to the proposed development as it does not relate to subdivision of land.

3.8 Clause 4.6(7) – Keeping of Records

Clause 4.6(7) is an administrative clause requiring the consent authority to keep a record of its assessment under this clause after determining a development application.

3.9 Clause 4.6(8) – Restrictions on use of cl4.6

Clause 4.6(8) of the LEP states as follows:

- (8) *This clause does not allow development consent to be granted for development that would contravene any of the following:*
 - (a) *a development standard for complying development,*
 - (b) *a development standard that arises, under the regulations under the Act, in connection with a commitment set out in a BASIX certificate for a building to which State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 applies or for the land on which such a building is situated,*
 - (c) *clause 5.4,*
 - (caa) *clause 5.5.*

Clause 4.6(8) is not relevant to the proposed development as it is subject to a DA and does not constitute Complying Development, does not seek to vary any BASIX commitments and does not relate to a standard under cl5.4 or cl5.5.

4 Conclusion

The proposed development contravenes the Height of Buildings development standard under cl4.3 of Tweed LEP 2014.

This written request to vary the development standard has been prepared in accordance with cl4.6(3) of the LEP and demonstrates that the preconditions under cl4.6 for granting of development consent have been met.

The Height of Buildings control under cl4.3 of the LEP is a development standard and is not excluded from the application of cl4.6 (cl4.6(2)).

Strict compliance with the development standard is unreasonable and unnecessary (cl4.6(3)(a)) because, notwithstanding the contravention of the Height of Buildings development standard, this cl4.6 request demonstrates that the proposed development:

- will not result in environmental harm that cannot be mitigated or minimised to an acceptable level; and
- is consistent with the objectives of the development standard pursuant to cl4.3 of the LEP.

There are sufficient environmental planning grounds (cl4.6(3)(a)) to justify the contravention of the Height of Buildings development standard including ensuring the proposed building complies with flood controls, limiting unnecessary excavation and transport of soil off-site, locating car parking beneath the building in an undercroft to minimise urban heat gain and maximise surrounding landscaping and vegetation retention/restoration and that there are no significant adverse environmental amenity impacts arising from the proposal.

Furthermore, this cl4.6 variation request demonstrates that the proposed development is in the public interest (cl4.6(4)(a)(ii)) because the proposed development is consistent with.

- the objectives of the development standard; and
- the objectives of the E4 General Industrial Zone.

The consent authority or the Court can assume the concurrence of the Secretary pursuant to the Notice issued on 21 February 2018 and can exercise its power pursuant to cl4.6(2) to grant development consent to the proposed development notwithstanding the contravention of the development standard.

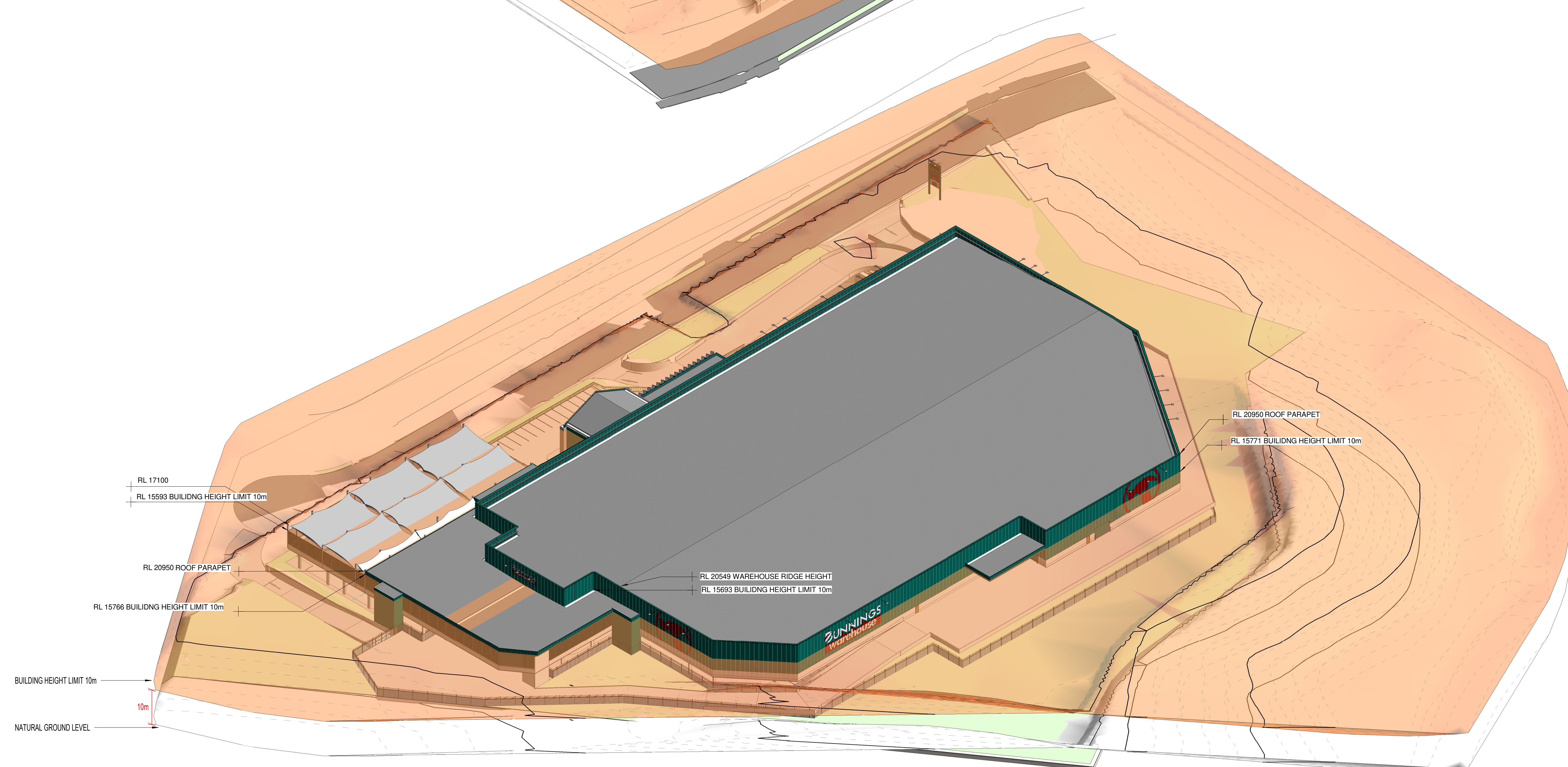
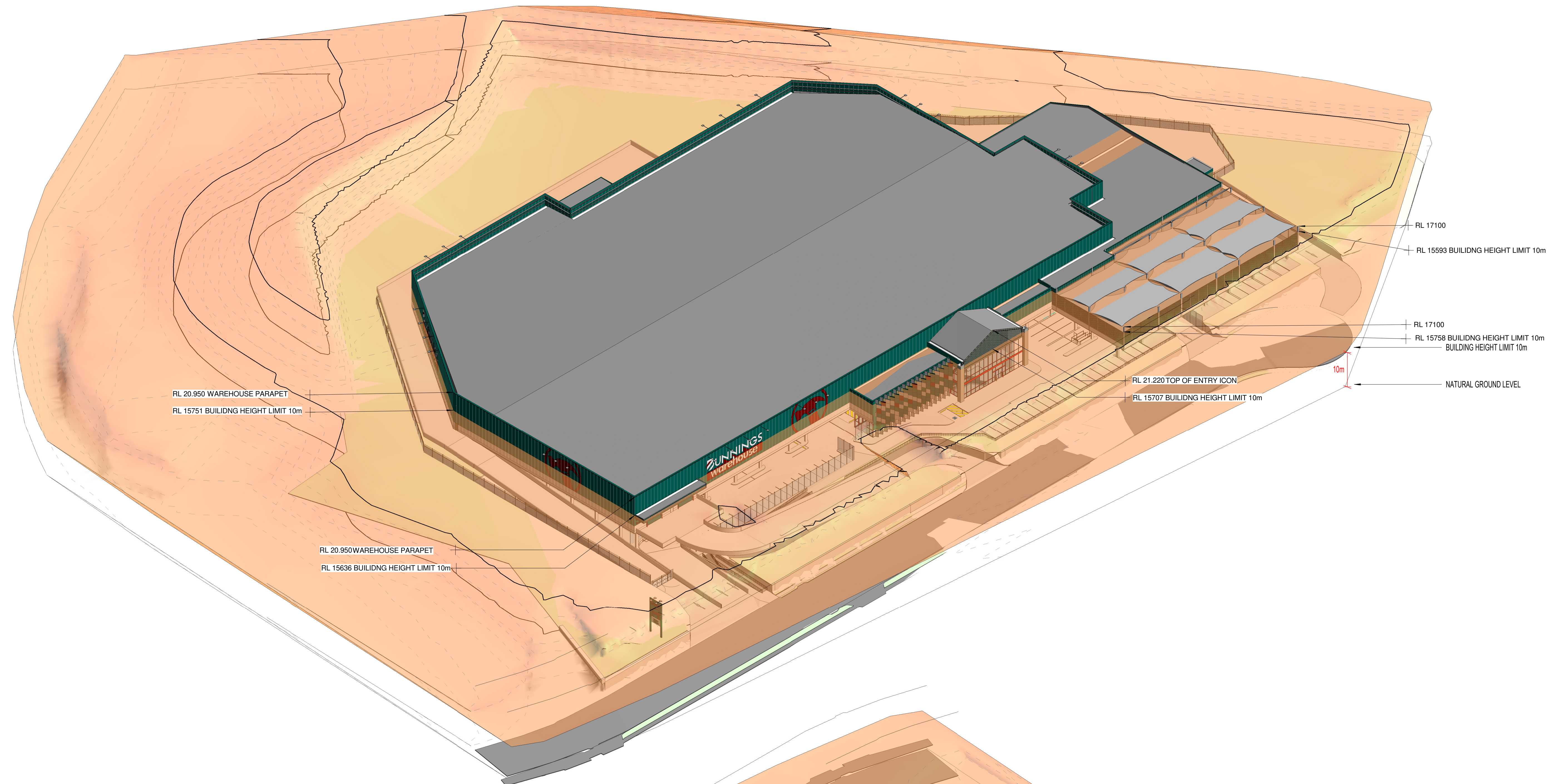
Accordingly, this written request can be relied upon by the consent authority when documenting that it has formed the necessary opinions of satisfaction under cl4.6(4) of the LEP.

Attachment 1: Height Envelope Plan prepared by Michael Carr Architects



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ATTACHMENT I

[illegible]

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ARCHITECTURAL

PROJECT:
BUNNINGS WAREHOUSE
44 ENTERPRISE AVENUE,
TWEED HEADS SOUTH, NSW
2485

DRAWING TITLE:

BUILDING HEIGHT ENVELOPE

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DATE:	DEC 2022
FILE:	
DESIGNED:	Designer
DRAWN:	Author
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T2