

26 February 2026

Keiran Thomas
Director, Housing Delivery Assessments
Department of Planning, Housing and Infrastructure
Level 31, 4 Parramatta Square,
Parramatta NSW 2124

Dear Keiran,

Request for Amended SEARs – Warringah Mall

This letter has been prepared on behalf of Scentre Group (**Scentre**). It constitutes a request for amended Secretary's Environmental Assessment Requirements (**SEARs**) to guide the preparation of an Environment Impact and Rezoning Statement (**EIRS**) that will accompany a State Significant Development Application (**SSDA**) and concurrent rezoning for the proposed mixed-use redevelopment of Westfield Warringah, which has a primary address of 145 Old Pittwater Road, Brookvale (**Warringah Mall** or **the site**).

1 Project Background

State Significant Development Declaration Order 2025 (No 3) states:

(4) The following development is declared to be State significant development:

(e) Development specified in EOI application 233529 dated 22 January 2025 including development for the purposes of mixed use development comprising commercial premises, residential accommodation and passenger transport facilities at 145 Old Pittwater Road and 123 Old Pittwater Road, Brookvale.

In accordance with this Ministerial Order, a Scoping Request was lodged in April 2025 for the following works:

- Concept approval for eight development blocks to facilitate a mixed use development within Warringah Mall.
- Stage 1 works for the construction of a 33 storey mixed use tower and public open space.

SEARs were issued by DPHI on 10 June 2025. Following receipt of the SEARs, Scentre have continued to provide updates to DPHI on design development for the proposal.

- A meeting was held with the DPHI Housing Delivery Authority team on 18 August 2025 to present an updated concept scheme. During this meeting, the requirement to amend the SEARs was discussed based on the refinements proposed including changes to towers and staging.
- A meeting with the State Design Review Panel (**SDRP**) was held on 2 October 2025. As part of design development, the scheme was amended from 1,500 to 1,600 apartments to facilitate affordable housing

on site. Feedback from this meeting has been incorporated into the current concept scheme prepared by SJB.

- In response to ongoing design development and feedback received, a project update meeting was held with DPHI, Scentre and Urbis on 17 December 2025. At this meeting, it was again reiterated that a request to amend the current SEARs would be lodged in early 2026.

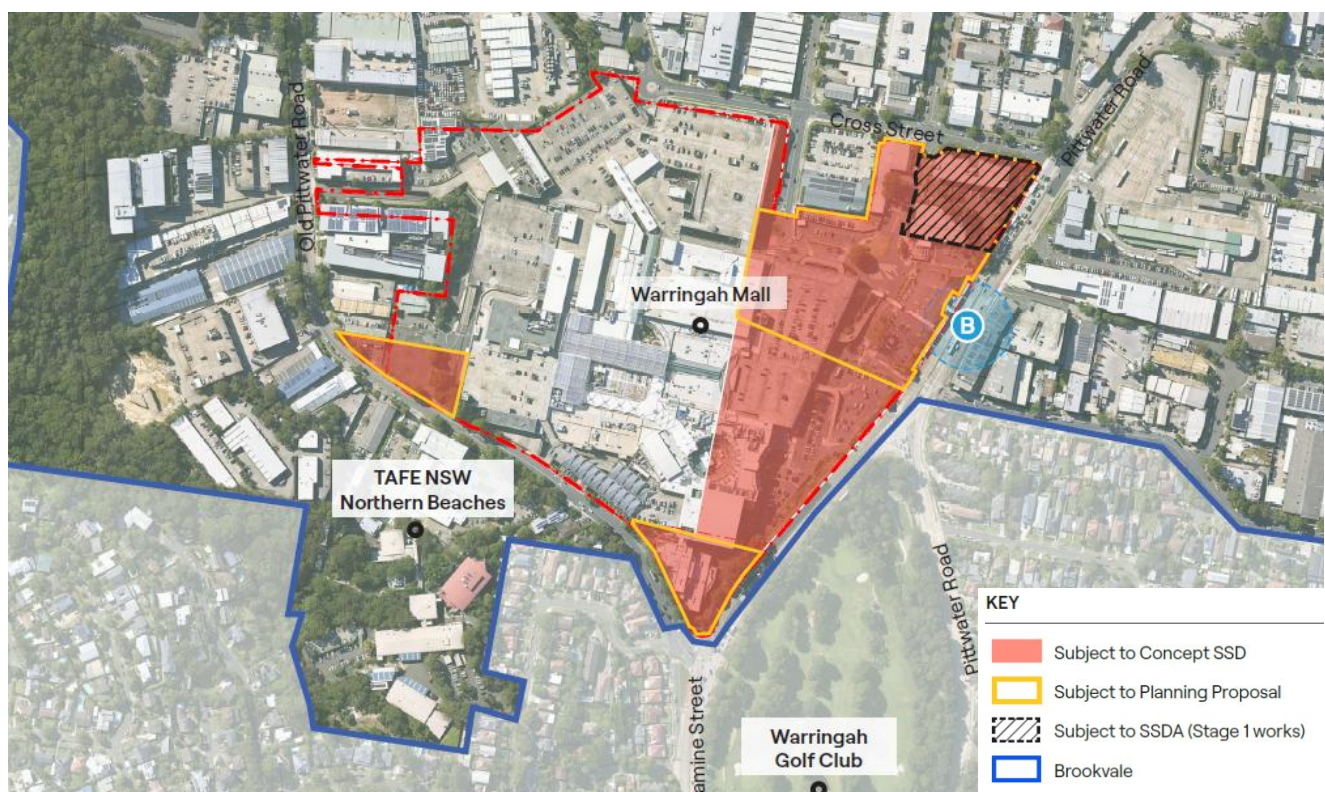
Discussions have also continued with Northern Beaches Council on key matters including the delivery of community facilities and traffic modelling for the Brookvale Structure Plan area.

In light of refinements to the overall concept scheme arising from early consultation, SDRP feedback and ongoing technical review, a request to amend the SEARs is required. It is intended that the SSDA will be lodged with DPHI by **31 August 2026**.

2 Amended Proposal

A site aerial is provided at **Figure 1** confirms the amended land application for the Planning Proposal and SSDA.

Figure 1 Site Aerial



Source: SJB

2.1 Concept and Stage 1 Works

Concept Proposal

The Concept Proposal involves the delivery of a new urban structure to Warringah Mall delivering:

- Eight (8) development blocks which will accommodate approximately 1,600 new dwellings.
- Associated roads and infrastructure upgrades
- An open space network incorporating 5,000 sqm of public open space

Figure 2 Indicative structure plan



Source: SJB

The Structure Plan prepared by SJB illustrates the general arrangement for development which includes:

- Four development blocks on the eastern frontage of the site addressing Condamine Street and Pittwater Road.
- Two development blocks to the north of the existing retail centre.
- One development block for the south gateway site, located on the corner of Old Pittwater Road and Condamine Street.
- The western precinct block opposite the Northern Beaches TAFE College.

Augmentation within the existing carparking associated with the shopping centre.

As noted in the original Scoping Proposal, the proposed development will result in changes to the existing Warringah Mall including:

- Removal of the existing medical centre, large format retail including Bunnings and Super Cheap Auto and a gymnasium resulting in the reduction of approximately 13,000sqm of GFA; and
- Reduction of approximately 450 car spaces.

Each block will be delivered as a separate stage in accordance with the indicative staging plan prepared by SJB. Final staging, beyond Stage 1 will be subject to further consideration as part of the SSDA.

Figure 3 Indicative staging plan



Source: SJB

A preliminary (numerical) overview of the proposed development is provided within the table below. It is still intended to develop the site over 20 years.

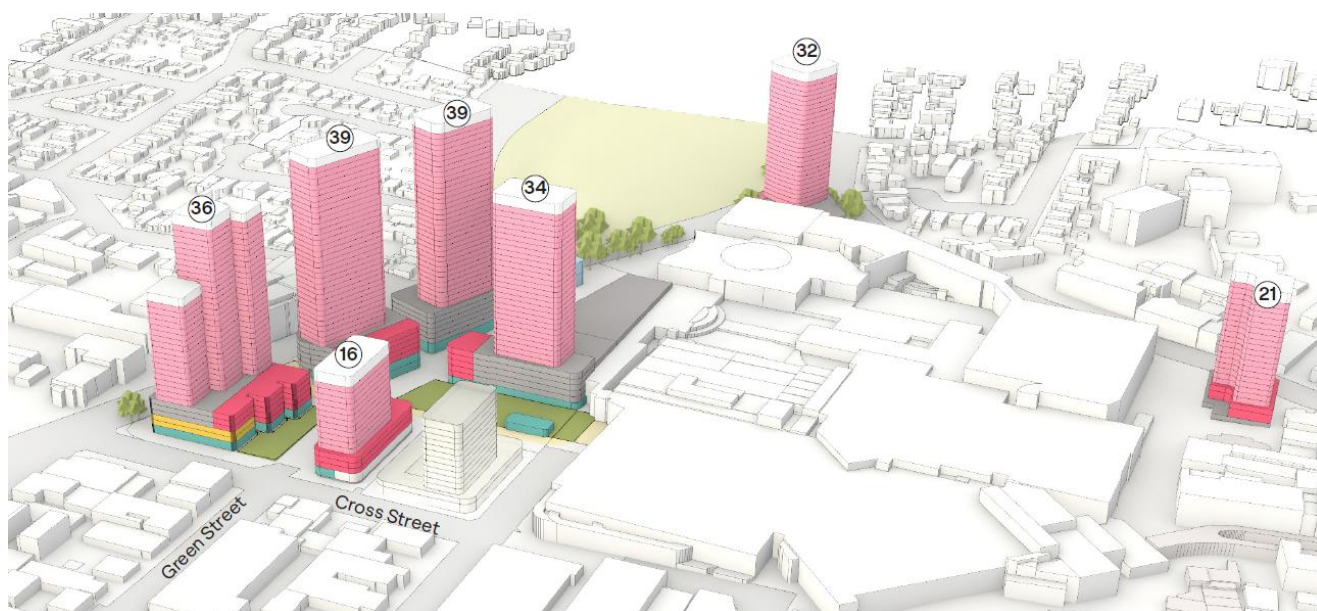
Table 1 Preliminary Numerical Overview of Concept Works

Descriptor		Proposal
Maximum Building Height		135 metres
Storeys		8 development blocks ranging from 2 storeys to 39 storeys
Dwellings		1,600 apartments (inclusive of affordable housing on site)
GFA	Residential	148,400 sqm (approximately)
	Non-residential	14,270 sqm (including commercial, retail, allied health, gymnasium, food and beverage and community facilities)
	Total	162,670 sqm (approximately)
Estimated car spaces		2,500 (approximately)
Affordable Housing Contribution		5% delivered on site
Public open space		5,000 sqm

Figure 4 Concept SSDA indicative massing



Picture 1 Massing from the south-east



Picture 2 Massing from the north-east

Source: SJB

Stage 1 Works

Development consent is sought pursuant to Section 4.22(4)(b) of the EP&A Act for the first stage of development without the need for a further development consent:

- Enabling works including demolition of any existing structures, services diversions and road works
- Construction of residential tower (up to 36 storeys) with non-residential uses including retail, food and beverage, community uses and parking in a 6 storey podium
- Delivery of 1,068 sqm of public open space
- Associated access arrangements and servicing augmentation.

A preliminary overview of the proposed development is provided within **Table 2**.

Table 2 Preliminary Numerical Overview of Stage 1 Works

Descriptor		Proposal
Maximum Building Height		124 metres
Storeys		36 storeys
Dwellings		310 apartments
GFA	Residential	31,566 sqm

Descriptor		Proposal
	Non-residential	346 sqm
	Community facilities	2,000 sqm
	Total	34,205 sqm
Estimated car spaces		492 (approx.)
Public open space		1,068 sqm

2.2 Proposed Amendments to the Warringah LEP

As part of the site selection and EOI process for the HDA, a key component of the application is to progress a Planning Proposal concurrently with the SSDA. This is consistent with Section 3.58 of the EP&A Act.

The intended outcome of the planning proposal is to establish a statutory planning framework that applies to the site. Specifically, the intended outcome of the proposal is to amend the Warringah LEP as follows:

- Rezone part of the site from E2 Commercial Centre and E4 General Industrial to MUI Mixed Use to allow a truly mixed-use development incorporating commercial premises, residential accommodation and passenger transport facilities.
- An Additional Permitted Use of 'residential accommodation' for land subject to the SSDA, noting that the MUI Zone in the Warringah LEP only permits shop top housing.
- Introduce the following development standards:
 - A maximum height of building development standard ranging from 47 metres to 129 metres for land subject to the SSDA
 - A floor space ratio development standard ranging from 3.4:1 to 5.3:1 for the land subject to the SSDA.
- Introduce a local provision to ensure development to ensure that development on land is carried out in accordance with a site-specific development control plan.

Initial rationale for the proposed amendments to the Warringah LEP is provided within **Table 3**.

Table 3 Summary of LEP Amendments

Development Standard	Proposed Amendment	Rationale
Land use zone	Clause 2.2 of the Warringah LEP and the associated Land Zoning Map sheet is proposed to be amended to update the current site zoning to MUI Mixed Use.	The MUI Mixed Use zone allows for a variety of land uses within a single area. This approach promotes vibrant, dynamic communities where people can live, work, and play without needing to travel long

Development Standard	Proposed Amendment	Rationale
		distances. The proposed zoning will also contribute to more sustainable urban development by reducing reliance on cars and promoting walkability.
Height of building	Clause 4.3 of the Warringah LEP and the associated Height of Building Map sheet are proposed to be amended to include the proposed Height of Building controls. The introduction of a height control within the site only relates to land subject to the concurrent SSDA.	Clause 4.3 of the Warringah LEP and Height of Building Map Sheet HOB_008A are proposed to be amended to include the proposed Height of Building controls (see Figure 5).
Floor Space Ratio (FSR)	Clause 4.4 of the Warringah LEP and the associated Floor Space Ratio Map sheet are proposed to be amended to include the proposed FSR controls. The introduction of an FSR control within the site only relates to land subject to the concurrent SSDA.	Clause 4.4 of the Warringah LEP and Floor Space Ratio Map Sheets HOB_008 are proposed to be amended to include the proposed FSR controls (see Figure 6).
Local Provision	It is proposed to add an additional local provision within Part 6 of the Warringah LEP. Recommended wording is provided: Clause 6.XX Development of land at 145 Old Pittwater Road and 123 Old Pittwater Road, Brookvale (1) This clause applies to part of the land at 145 Old Pittwater Road and 123 Old Pittwater Road, Brookvale, being Lot 103 in Deposited Plan 1247294 and Lot 1 in Deposited Plan 529544. (2) Development consent must not be granted to development on land identified within this section unless a development control plan has been prepared for the land that provides for the following— (a) built form controls, including the maximum number of storeys and minimum setbacks for buildings,	This control ensures that the built form controls for the site are required to facilitate development in accordance with the new zoning and development standards for the site. This can be achieved via the concurrent SSDA or a future development control plan. In accordance with Section 4.23 of the EP&A Act, a concept development application may be made for development requiring consent under Part 4 as an alternative to a development control plan required by an environmental planning instrument.

Development Standard	Proposed Amendment	Rationale
	(b) measures to ensure development does not result in a negative impact on the character of surrounding land, (c) pedestrian access, including through-site links, (d) landscaping of open space	
Additional permitted use	It is proposed to add an additional permitted use for the site within Schedule 1 Additional Permitted Uses of the Warringah LEP. Recommended wording is provided: XX. Use of certain land at 145 Old Pittwater Road and 123 Old Pittwater Road, Brookvale (1) This clause applies to land at 145 Old Pittwater Road and 123 Old Pittwater Road, Brookvale, being Lot 103 in Deposited Plan 1247294 and Lot 1 in Deposited Plan 529544. (2) Development for the following purposes is permitted with development consent – (a) Residential accommodation.	This clause is proposed to introduce residential accommodation in alignment with the Minister's State Significant Development Declaration Order 2025 (No 3) which notes residential accommodation as a permissible use on the site.

The amended proposal remains consistent with the strategic merit assessment undertaken as part of the original Scoping Report.

Figure 5 Indicative LEP mapping



Picture 3 Indicative height of buildings mapping



Picture 4 Indicative floor space ratio mapping

Source: SJB

3 Preliminary Assessment of the Amended Proposal

- **Statutory Context:** No changes are identified to the statutory context of the site addressed in the original Scoping Proposal. The EIRS will still incorporate an amendment to the Warringah LEP to introduce residential accommodation as an additional permitted use for the site.
- **Strategic Merit:** The proposal continues to have strategic merit and aligns with the intent of the Brookvale Structure Plan by increasing dwelling supply with connections to an existing transport hub and deliver a new town centre for Brookvale. A full assessment will be prepared as part of the EIRS.
- **Community and Stakeholder Engagement:** Since lodgement of the SEARs, Scentre Group has continued to engage with key stakeholders in particular the Northern Beaches Council and DPHI. Formal engagement with the community will occur shortly.

3.1 Environmental Assessment Matters for Concept SSDA And Detailed SSDA

Matter	Description
Traffic and Transport Considerations	The capacity of the A8 Corridor, particularly Pittwater Road and Condamine Street, is a key factor in determining growth potential under the BSP. Council's 2019 TMAP modelling set growth limits at around 1,300 dwellings and 975 jobs with modest upgrades, with more significant works enabling up to 3,450 dwellings. Updated modelling is underway, with the proponent working with Council and TfNSW to explore scenarios supporting up to 1,500 dwellings on the Warringah Mall site. A Traffic Impact Assessment will be prepared in line with TfNSW guidelines, assessing traffic, parking, access, and active transport impacts, and identifying potential infrastructure improvements such as bus lane extensions, road widening, improved pedestrian and cycling connections, and intersection reconfigurations. A preliminary Construction Traffic Management Plan will address potential transport disruptions during construction.
Stormwater/Overland Flow Impacts	Located in a basin below Allambie Heights and Beacon Hill, the Warringah Mall site contains Brookvale Creek in a box culvert. Over the past two decades, significant flood mitigation works have been undertaken, including culvert amplification and creek bank upgrades. Updated flood modelling for the proposed development shows buildings can be sited without significantly affecting flood levels, with some footprints located over culverts designed to support future development. Stormwater capacity will be confirmed during design, with proposed buildings located on already impervious areas, ensuring minimal impact on drainage performance.
Visual Impact Assessment	The proposed development will introduce residential towers along Pittwater Road, shifting the area's built form from low-scale horizontal massing to a more vertical urban typology. Given the site's valley location, the new buildings will be visible from elevated points in Allambie Heights and Beacon Hill, as well as from key visual corridors along Pittwater Road and Condamine Street. A detailed visual impact assessment will be undertaken as part of the EIS to evaluate view impacts and implications for local visual character.

Affordable Housing Provision Strategy	Scentre Group is committed to delivering affordable housing on the Warringah Mall site, with a strategy to be developed in consultation with stakeholders including community housing providers. The strategy will consider in-kind delivery versus monetary contributions, preferred housing types, defined term models and staging options aligned with the overall project. Initiatives may include prioritising local workers, ensuring high-quality asset management, and offering secure long-term leases to support community stability and economic resilience.
Infrastructure Contributions and Delivery	As the key node for the Brookvale Town Centre under the BSP, the Warringah Mall site will deliver major public open spaces and community facilities, supporting housing growth across the precinct. Council is preparing a s7.11 contributions plan to fund required infrastructure, with the site's contributions likely delivered through works in kind under a planning agreement. Scentre Group is continuing to discuss these matters directly with Council.
Connecting with Country	All future development will consider the Connection to Country Framework prepared by the GANSW. The design has been informed by Country and will clearly demonstrate how the framework has been implemented and reflected in the design.
Urban Design and Landscaping	The SSDA documentation will build upon this detailed work to date and will include an urban design and landscape report, demonstrating that the proposal including both concept and detailed works are of a high quality and landscape led design. The project aims to provide a high-quality landscaped outcome on the site. The Urban Design will be informed by Country and will reflect and embed the recommendations of the appointed cultural advisor to address the Connection with Country framework. Architectural and Landscape Plans will be prepared for concept and detailed works including concept building envelopes.
Amenity	The SSDA will need to address key environmental amenity matters to ensure the project can provide a high-quality outcome with strong liveability attributes. Key technical studies to inform the EIS will (if required) include overshadowing diagrams; noise and vibration impact assessment, visual impact assessment; and public domain and landscape strategy.
ADG Compliance	The Architectural Design Report will include a complete assessment against the applicable provisions of the NSW <i>Apartment Design Guide (ADG)</i> including a Design Verification Statement for detailed works and a preliminary assessment of concept works.
Overshadowing	The Architectural Plans will be accompanied by detailed shadow diagrams that demonstrate compliance the ADG and consideration of existing and proposed open spaces both within and external to the site. Solar analysis has informed the proposed height planes to ensure existing solar access to residential areas to the east and public open spaces (Warringah Golf Course) to the south are protected. The proposed building heights were shaped in

	response to solar access, limiting the total storey height across the site and leading to a distinct shape of higher built form along Pittwater Road. The Urban Design Report prepared by SJB has undertaken initial shadow analysis on surrounding built form and impacts on proposed public open spaces. Initial studies have identified that the concept and detailed works can achieve compliance with relevant ADG considerations including safeguarding 50% of solar access to the proposed Town Square open space between 11am and 2pm.
Noise and Vibration	A Noise and Vibration Impact Assessment (NVIA) will accompany the assessment of noise and vibration matters in the EIS, to satisfy the Environmental Protection Authority's (EPA) <i>Noise Policy for Industry, Interim Construction Noise Guideline (ICNG)</i> and Road Noise Policy. Mitigation, management, and monitoring measures will be documented and implemented over the demolition, construction, and operation of the site.
Water and Flooding	Analysis of the sites water and stormwater conditions will be included in the civil infrastructure report and plans. A Soil and Water Management plan (SWMP) will be required alongside the completion of an Erosion and Sediment Control Plan and Stormwater Management Strategy (SMS). These will help inform further analysis of the surrounding catchment capacity on and around the site as well as any irrigation risks. Consideration of flood modelling provided by Council for the site will be included within the SSDA.
Contamination	Potential sources of contamination have been identified as part of previous development applications for the site. Accordingly, a PSI will be submitted to support the assessment of the SSDA. An Unexpected Finds Protocol and HAZMAT Survey will be submitted before a Construction Certificate is issued.
Geotechnical	A Geotechnical Report will provide an assessment of the ground conditions of the site and any risks associated with ground stability or proposed excavation. The report will detail the findings from a desktop review of the site and borehole testing where necessary. The report will recommend appropriate temporary and permanent site support and retention measures if required. The Geotechnical Report will also assist to determine any required engineering and earthworks to achieve the proposed development outcome.
Waste	The proposed development is expected to generate waste during the demolition, construction, and operation phases. A Waste Management Plan (WMP) will be attained to determine the extent of management required and will be in accordance with waste regulatory frameworks and legislation.
Biodiversity	A Biodiversity Development Assessment Report will be prepared to address any impacts on local biodiversity. The proposed development is not expected to result in any unacceptable impacts to biodiversity values that cannot be appropriately mitigated.

Tree Removal	For any tree removal required for detailed works, an Arboricultural Impact assessment will be prepared that assesses the number, location, condition and significance of trees to be removed and retained including any existing canopy coverage to be retained on-site and tree root mapping.
Aboriginal Cultural Heritage	An Aboriginal Cultural Heritage Assessment (ACHA) will be prepared as part of the EIS to assess the impact of the proposed development on Aboriginal heritage items on the site. This process will require consultation with Registered Aboriginal Parties.
Heritage	There are no local or State listed heritage items adjoining the site. No mitigations are required in relation to identified local and State heritage items within the general vicinity of the site, which will not be impacted by the proposed development. It is not anticipated a Heritage Impact Statement will be required to address heritage items within proximity of the site.
Building Code of Australia	A Building Code Compliance Report will be prepared for the development and will present the findings of an assessment of the proposed building against the Performance Requirements of the Deemed-to Satisfy provisions of the Building Code of Australia (BCA). The assessment will also identify whether the development will rely on an Alternate Solution based assessment.
Access	An access report will be prepared for the development to ensure that disabled access can be provided in accordance with <i>Disability Discrimination Act 1992</i> . The access report will demonstrate how access for all users is addressed through the development.
ESD	An Ecologically Sustainable Development (ESD) Report will be prepared to provide a sustainability assessment development. The ESD report will provide an assessment of the building design and demonstrate ways in which the development can achieve best practice and compliance with sustainability requirements in accordance with the requirements of the Sustainable Buildings SEPP.
Utilities and Infrastructure Servicing	A Utilities and Infrastructure Servicing Report will be prepared as part of the SSDA assess the existing constraints and opportunities, associated with the concept and detailed works. This report will also assess the capacity of the relevant service infrastructure networks to service the site, impacts on the networks resulting from the proposal and identify any augmentation and servicing options proposed to support the proposal.
Social Impact & CPTED	A Social Impact Assessment (SIA) will be prepared which assess the social consequences the project, namely the impacts on affected groups of people and on their way of life, life chances, health, culture, and capacity to sustain these. The SIA will address the positive and negative impacts associated with the project, as well as the measures to mitigate these impacts. The SIA will be prepared in line with the <i>NSW Guidelines for Social Impact Assessments</i> . A CPTED Assessment will detail how a development has been designed to reduce opportunities for crime by embedding a variety of design and place management principles into the Design.

Community Engagement	An Engagement Outcomes Report will be provided as required by the SEARs. The report will outline the engagement carried out to date, the outcomes of that engagement and how it has informed the proposal. The report will provide evidence of a transparent and collaborative engagement process. This document will be included in EIS as part of the SSDA. The document will also outline: ▪ Issues raised by surrounding landowners & stakeholders. ▪ Project response to issues ▪ Proposed future community and stakeholder engagement based on the results of consultation.
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3.2 Environmental Assessment Matters for Planning Proposal

Matter	Description
Planning Proposal Report	The Planning Proposal will include a full assessment against the site specific and strategic merit tests in accordance with the LEP Making Guideline and identify new planning controls for the site including zoning, height of building, floor space ratio and additional permitted uses.
Urban Design Report	The Planning Proposal will incorporate urban design and landscape report, demonstrating that the proposed changes to development standards will result in a high quality and landscape led design. The design framework will be informed by Country and will reflect and embed the recommendations of the appointed cultural advisor to address the Connection with Country framework.
Traffic	To address the impacts of additional dwellings associated with the new built form controls, a comprehensive Transport Strategy and Transport Impact Assessment for the site will be prepared which addresses the existing constraints, opportunities, and key issues for the site. This report will identify the trip generating potential for all proposed modes and purposes with consideration of Council's existing traffic modelling.
Visual Impact	Visual impact will be addressed within the Planning Proposal including impacts on viewpoints and vistas as visual amenity assessment of landscaping, design and supporting works.
Water and Flooding	Analysis of the sites water and stormwater conditions will be assessed as part of the Planning Proposal. Consideration of flood modelling provided by Council for the site will be included within the Planning Proposal.
Utilities and Infrastructure Servicing	A Utilities and Infrastructure Servicing Report will be prepared as part of the Planning Proposal assess the existing constraints and opportunities, associated with the existing network capacity. This report will also assess the capacity of the relevant service infrastructure networks to service the site, impacts on the networks resulting from the proposal and identify any augmentation and servicing options proposed to support the proposal.

Economic Impact	A comprehensive Economic Impact Assessment will be submitted to support the SSDA and the inclusion of 'residential accommodation' as an additional permitted land use within the MUI zone. Our preliminary review of existing and future market conditions has provided a strong initial indication that the proposed development will have a positive economic impact, given the proposed development aims to increase housing supply in a manner that complements, rather than competes with, the commercial function of Warringah Mall and the Brookvale centre.
Community Engagement	The Engagement Outcomes Report prepared as part of the SSDA will also incorporate any engagement undertaken to inform key stakeholders and the community on the proposed amendments to the Warringah LEP.

4 Conclusion

We trust that the information detailed in this report is sufficient to enable the Secretary to issue amended SEARs. As noted above, it is intended that the full SSDA package will be lodged with DPHI by 31 August 2026 for assessment and determination.

Please feel free to contact me if you have any questions or should you wish to discuss further.

Kind regards,



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