



DM Planning

## Statement of Environmental Effects

Use of an existing building as a  
detached dual occupancy



**170 Powderworks Road, Elanora Heights**

Report prepared for  
Shing May Liang  
March 2025

## Table of Contents

<b>1</b>	<b>Introduction .....</b>	<b>3</b>
<b>2</b>	<b>The site, locality and background .....</b>	<b>4</b>
2.1	Site description .....	4
2.2	Background .....	7
<b>3</b>	<b>The proposal .....</b>	<b>9</b>
<b>4</b>	<b>Environmental planning assessment .....</b>	<b>10</b>
4.1	Environmental Planning and Assessment Act 1979 .....	10
4.2	State Planning Policy Controls Overview .....	12
4.2.1	State Environmental Planning Policy (Resilience and Hazards) 2014 .....	12
4.2.2	State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 ..	12
4.3	Pittwater Local Environmental Plan 2014 .....	13
4.4	Pittwater Development Control Plan 2014 .....	15
4.5	Non-compliances .....	22
<b>5</b>	<b>Conclusion .....</b>	<b>24</b>

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## 1 Introduction

This Statement of Environmental Effects (SEE) has been prepared on behalf of Shing May Liang to accompany a Development Application (DA) for the use of an existing building as a dual occupancy at 170 Powderworks Road, Elanora Heights.

This SEE has been prepared and is submitted to Northern Beaches Council (Council) pursuant to the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This SEE describes the site, its surroundings and explains how the proposal addresses and satisfies the objectives and standards of the Pittwater Local Environmental Plan 2014 (PLEP), the Pittwater 21 Development Control Plan 2014 (WDCP), and the heads of consideration listed in Section 4.15 of the Environmental Planning and Assessment Act 1979 (as amended).

This SEE demonstrates that the proposal is consistent with the relevant provisions of the:

- *Pittwater Local Environment Plan 2014*
- *Pittwater 21 Development Control Plan 2014*

This SEE concludes that the proposal is satisfactory when assessed against all relevant requirements. It will positively contribute to the locality and result in improved amenity for the occupants, with no detrimental environmental or amenity impacts.

We recommend that the Council approve the development application subject to the content and findings outlined in this SEE.



## 2 The site, locality and background

### 2.1 Site description

The site is in the Northern Beaches Local Government Area (LGA).

The site is legally described as Lot 224, DP 24922, and is known as 170 Powderworks Road, Elanora Heights. The site is irregular and has an area of 511.5m<sup>2</sup>. It is located on the northern side of Powderworks Road. It has a street frontage to Powderworks Road of 19.395m, a western (side) boundary of 50.665m, an eastern boundary of 51.39m and a rear boundary of 19.175m. The site has a cross fall from west to east of 1m. Some small trees and shrubs are on the site, primarily around the perimeter.

The site is occupied by a large, two-storey dwelling and a smaller, detached dwelling adjacent to the rear boundary. There is also a swimming pool in the rear yard. Vehicular access to the site is via a driveway from Powderworks Road.

The location of the site is shown in Figures 1 and 2.

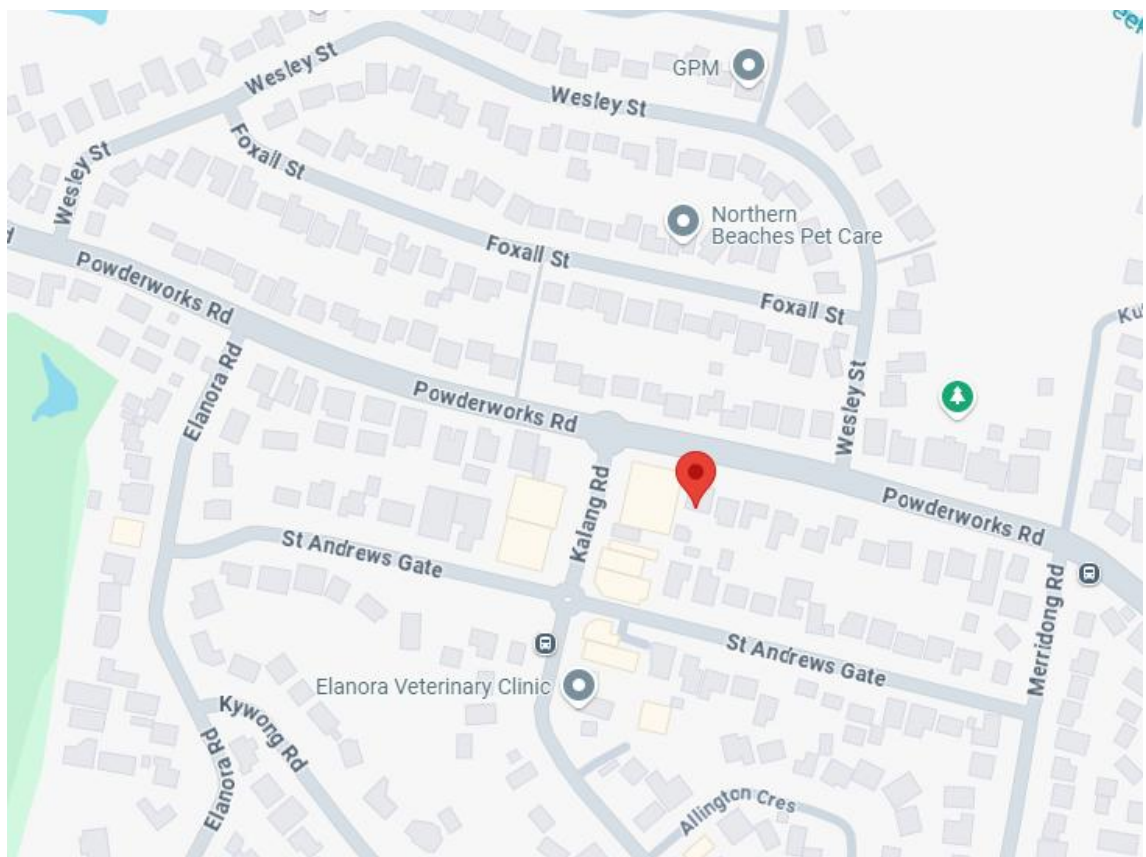


Figure 1. Location of the site (Source: Google Maps)





Figure 2. Aerial view of the site and its surroundings (Source: SIX Maps)



Figure 3. Existing front of dwelling from Powderworks Road



*Figure 4. Existing front of dual occupancy to the rear*



*Figure 5. Two storey dwelling and western setback*





Figure 6. Swimming pool and rear dwelling

The surrounding context is characterised by one—and two-storey detached dwellings on large lots built in various architectural styles.

A multi-storey shoptop housing development is located to the west of the site, on the corner of Powderworks Road and Kalang Road.

## 2.2 Background

On 25 October 2024, the Council issued a Development Control Order to the owners of the property stating:

**Order No. 3 - Demolish Works Order:**

*To demolish or remove a building, specifically:*

*1. Demolish and remove the unlawful building works at 170 Powderworks Road ELANORA HEIGHTS NSW 2101, legally identified as Lot 224 DP 24922 (Premises), including:*

*A. The kitchen in the upper level of the Premises consisting of under bench and overhead cupboards, marble benchtop with double sink and marble splashback, cooktop with rangehood above, and under bench dishwasher.*

*B. All unapproved works from the detached brick garage at the rear of the Premises, including:*

*I. Sliding aluminium door.*

*II. A kitchen consisting of under bench cupboards, marble bench top fitted with a glass cook top, overhead rangehood and single sink, glass splash back.*



- III. A bathroom with shower, basin, toilet, and washer/dryer.*
  - IV. Two bedrooms separated from the open space area.*
  - V. Remove all walls which have enclosed the original garage area.*
- A building:*

The kitchen on the upper level of the two-storey dwelling has now been removed. Consequently, the site contains two dwellings, the two-storey brick dwelling and the single-storey dwelling at the rear.

A Building Information Certificate for the unauthorised building works will be lodged concurrently with this Development Application.



### 3 The proposal

The development application seeks consent for the use of the site as a detached dual occupancy. No building works are proposed with the Development Application.

The two dwellings comprise:

Front Dwelling:	Two-storey brick dwelling fronting Powderworks Road.
Rear Dwelling:	One-storey brick dwelling in the rear setback, containing two bedrooms, bathroom, open plan kitchen, living and dining area and a bathroom.  Gross Floor Area (GFA) of 78.75m <sup>2</sup>

The proposal is detailed in the accompanying architectural plans prepared by JJ Drafting Architects.

A Building Information Certificate for the unauthorised building works will be lodged concurrently with this Development Application.



## 4 Environmental planning assessment

### 4.1 Environmental Planning and Assessment Act 1979

The proposal is consistent with the objects of the EP&A Act as it is considered to promote the orderly and economic use and development of land without resulting in an adverse impact on the environment.

This section of the report provides the planning assessment against the key statutory environmental planning instruments and Development Control Plan relevant to the development. The following detailed assessment of the proposal is provided, and which is based on the heads of consideration contained in section 4.15 of the EP&A Act.

#### 4.15(1) Matters for consideration—general

*In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:*

Relevant Provision	Comment
(a) the provisions of:	
(i) any environmental planning instrument, and	<ul style="list-style-type: none"><li>• The relevant state environmental planning instruments are addressed in Section 4.2.</li><li>• The relevant provisions of the Pittwater Local Environmental Plan 2014 (PLEP) are addressed in Section 4.3.</li></ul>
(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	N/A
(iii) any development control plan, and	The relevant provisions of the Pittwater Development Control Plan 2014 (P21DCP) are addressed in Section 4.4.
(iia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	N/A
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The requirements of the EP&A Regulations are satisfied. Applicable regulation considerations including demolition, fire safety, compliance with the Building Code of Australia, compliance with the Home Building Act, PCA appointment, notice of commencement of



Relevant Provision	Comment
	works, sign on work sites, critical stage inspections and records of inspection may be addressed by appropriate consent conditions.
(v) <i>(Repealed)</i>	
(b) <i>the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,</i>	<p><b>Environmental Impact</b> The Pittwater 21 Development Control Plan 2014 section of this report addresses the proposed use's environmental impacts on the natural and built environment.</p> <p><b>Social Impact</b> The proposed use will have a positive impact on the locality, considering the residential use of the proposal.</p> <p><b>Economic Impact</b> The proposed use will have a positive economic impact on the locality, considering the nature of the existing and proposed land use.</p>
(c) <i>the suitability of the site for the development,</i>	The proposed use is suitable for the site as demonstrated throughout this report.
(d) <i>any submissions made in accordance with this Act or the regulations,</i>	Any submissions made on this subject development application will be duly considered. In addition, the Council will consider any public submissions relating to the proposal during its assessment.
(e) <i>the public interest.</i>	The proposal is in the public interest as it allows for appropriate and positive use on an existing residential site.

Table 1: Section 4.15(1) assessment



## 4.2 State Planning Policy Controls Overview

The proposal has been designed having regard to the objectives and standards of the relevant planning instruments and policies that apply to the site. Under the provisions of the EP&A Act, the key applicable State Environmental Policies are:

- *State Environmental Planning Policy (Resilience and Hazards) 2014*
- *State Environmental Planning Policy (BASIX)*

The following sections of this SEE discuss the application of the above plans and policies.

### 4.2.1 State Environmental Planning Policy (Resilience and Hazards) 2014

#### Chapter 4 Remediation of land

The provisions of Chapter 4 require the Council to consider the potential for a site to be contaminated. The subject site has been historically used for residential purposes and retains its residential use. It is unlikely to contain any contamination and further investigation is not warranted in this case.

### 4.2.2 State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

The State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 (BASIX) seeks to encourage sustainable development within NSW.

As there are no building works proposed with this application a BASIX Certificate is not required.

It is noted that a BASIX Certificate has been lodged with the Building Certificate Application.





## 4.3 Pittwater Local Environmental Plan 2014

Pittwater Local Environmental Plan 2014 (PLEP) is the primary environmental planning instrument applying to the proposal. The applicable Clauses of the PLEP 2014 are:

- Clause 2.3 – Zone objectives and landuse table
- Clause 4.3 – Height of Buildings
- Clause 5.4 – Controls relating to miscellaneous permissible uses
- Clause 7.1 – Acid sulfate soils
- Clause 7.10 – Essential Services

The following sections of this SEE provide an assessment of the development application against the above relevant Clauses of the PLEP.

### **Clause 2.3 – Land Use Zoning and Permissibility**

The site is zoned R2 Low Residential pursuant to the PLEP. The provisions of the zone are stated below:

#### **Zone R2 Low Density Residential**

##### **1 Objectives of zone**

- To provide for the housing needs of the community within a low density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To provide for a limited range of other land uses of a low intensity and scale, compatible with surrounding land uses.

##### **2 Permitted without consent**

*Home business, Home occupations*

##### **3 Permitted with consent**

*Bed and breakfast accommodation; Boat sheds; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; **Dual occupancies**; Dwelling houses; Environmental protection works; Exhibition homes; Group homes; Health consulting rooms; Home-based child care; Home industries; Jetties; Oyster aquaculture; Places of public worship; Pond-based aquaculture; Respite day care centres; Roads; Secondary dwellings; Tank-based aquaculture; Veterinary hospitals; Water recreation structures*

##### **4 Prohibited**

*Any development not specified in item 2 or 3*

*Table 2: Provisions of the PLEP 2014 R2 Low Density Residential Zone*

The proposal is for the **use** of two existing buildings as a dual occupancy (detached) and is permissible with consent in the R2 zone. PLEP defines dual occupancy as follows:

**dual occupancy (detached)** means 2 detached dwellings on one lot of land, but does not include a secondary dwelling.

The proposed use is consistent with the objectives of the zone.



**Clause 4.3 – Building Height**

Clause 4.3 of the PLEP establishes a maximum building height for the site of 8.5m. The height of the existing rear dwelling is 3m, and the height of the existing front dwelling is 8.21m. The existing development on the site complies with the maximum building height. There are no new building works proposed.

**Clause 7.1 – Acid sulfate soils**

The objective of clause 7.1 is to ensure that development does not disturb, expose or drain acid sulfate soils and cause environmental damage. The site is identified as Class 5 on the Acid Sulfate Soils Map. This is the lowest risk classification. As the proposal does not require excavation, there will be no disturbance to acid sulfate soils.

**Clause 7.10 Essential services**

Clause 7.10 states that development consent must not be granted unless the consent authority is satisfied that any of the following services that are essential for the development are available or that adequate arrangements have been made to make them available when required—

- (a) the supply of water,*
- (b) the supply of electricity*
- (c) the disposal and management of sewage,*
- (d) stormwater drainage or on-site conservation,*
- (e) suitable vehicular access.*

The survey plan demonstrates that the required water, electricity, and sewerage infrastructure is available to the site.

A suitable vehicular access point to the site is existing.

## 4.4 Pittwater Development Control Plan 2014

The following Pittwater 21 Development Control Plan 2014 (P21DCP) requirements are relevant to the development of the site.

### Built Form Controls

Built Form	Requirement	Proposed	Complies
Front building line (Powderworks Road)	6.5m	14m (no change)	Yes
Rear building line	6m	2.5m (rear dwelling)	No (no change to existing building)
Side building line	2.5m (W)	2.8m (front dwelling) Nil (rear dwelling)	Yes No (no change to existing building)
	1m (E)	1.5m (front dwelling) 8m (rear dwelling)	Yes Yes
Building envelope	3.5m (E)	Within envelope	Yes
	3.5m (W)	Within envelope	Yes
Landscape area	50% (393.5m <sup>2</sup> )	43% (421m <sup>2</sup> )	No (no change to existing landscaped area)

### 4.4.1 Locality Statement

The subject site is located within the Elanora Heights locality as identified on the Pittwater 21 Locality Map. The Desired Character of the locality is described in Part A4.5 of the P21DCP.

*he Elanora Heights locality will remain primarily a low-density residential area with dwelling houses a maximum of two storeys in any one place in a landscaped setting, integrated with the landform and landscape. Secondary dwellings can be established in conjunction with another dwelling to encourage additional opportunities for more compact and affordable housing with minimal environmental impact in appropriate locations. Any dual occupancies will be located only on the plateau on land that has less tree canopy coverage, species and habitat diversity and fewer other constraints to development. Land in the vicinity of Caladenia Close and Dendrobium Crescent to the west will remain a low-density rural residential area due to the constraints and characteristics of the land, including steepness of slope, species and habitat diversity, and lack of infrastructure. Any medium density housing will be located within and around commercial centres, public transport and community facilities. Retail, community, and recreational facilities will serve the community.*

*Future development is to be located so as to be supported by adequate infrastructure, including roads, water and sewerage facilities, and public transport.*

*Future development will maintain a building height limit below the tree canopy, and minimise bulk and scale. Existing and new native vegetation, including canopy trees, will be integrated with the development. Contemporary buildings will utilise facade modulation and/or incorporate shade elements, such as pergolas, verandahs and the like. Building colours and materials will harmonise with the natural environment. Development on slopes will be stepped down or along the slope to integrate with the landform and landscape, and minimise site disturbance. Development on non-urban zoned land shall maintain generous spatial separation of the built form and low site coverage on large lots. Development will be designed to be safe from hazards including landslip and bushfire.*

*A balance will be achieved between maintaining the landforms, landscapes and other features of the natural environment, and the development of land. As far as possible, the locally native tree canopy and vegetation will be retained and enhanced to assist development blending into the natural environment, and to enhance wildlife corridors.*

*Heritage items and conservation areas indicative of the Guringai Aboriginal people and of early settlement in the locality will be conserved.*

*Vehicular, pedestrian and cycle access within and through the locality will be maintained and upgraded. The design and construction of roads will manage local traffic needs, minimise harm to people and fauna, and facilitate co-location of services and utilities.*

There are no known threatened species on the site and the site is not identified as having natural environmental significance on the PLEP maps.

The site is not identified as a heritage item nor is it located in the vicinity of any heritage items.

The proposal is consistent with the desired character for Elanora Heights.

#### **Section B General Controls:**

An assessment of the proposed development against the relevant Section B controls of P21DCP is outlined below.

<b>Built Form Control</b>	<b>Requirement</b>	<b>Proposed</b>	<b>Compliance</b>
<b>B4.22 Preservation of Trees and Bushland Vegetation</b>	A Vegetation Clearing Permit is required for:  a) Removal or cutting down of any tree over five (5) metres in height; b) Pruning of more than ten percent (10%) of a tree canopy.	There are no trees proposed to be removed.	Yes





Built Form Control	Requirement	Proposed	Compliance
	c) The removal or cutting down of vegetation in "Bushland".		
<b>B5.15 Stormwater Management</b>	Rates of stormwater discharged into receiving environment maintained or reduced.	Stormwater will be collected and directed to the kerb and gutter in Powderworks Road.	Yes
<b>B6.3 Off-street Vehicle Parking Requirements</b>	Dwelling house with 2 bedrooms or more is required to provide 2 car spaces	Two tandem parking spaces per dwelling are provided on either side of the shared driveway.	Yes
<b>B8 Site works management</b>	Reduction management of demolition, excavation and construction works is to be minimised by reuse on-site, recycling, or disposal at an appropriate waste facility  Ensuring public safety and the protection of public domain.	As no building works have been proposed, site management is not relevant.	N/A

Table 3. Section B General Controls Compliance Table

#### 4.4.2 Section C1 Design Criteria for Residential Development:

An assessment of the proposed development against the relevant Section C controls of P21DCP is outlined below.

Pittwater 21 DCP clause	Requirement	Proposal	Compliance
<b>C1.1 Landscaping</b>	A range of low-lying shrubs, medium-high shrubs and canopy trees shall be provided to soften the built form.	The proposal will not result in the loss of any vegetation on the site.	Yes
<b>C1.2 Safety and Security</b>	Four Crime Prevention Through Environmental Design principles include:  1. Surveillance	The existing front verandah provides casual surveillance of the street.	Yes



Pittwater 21 DCP clause	Requirement	Proposal	Compliance
	2. Access Control 3. Territorial Reinforcement 4. Space Management		
<b>C1.3 View Sharing</b>	Building lines and height are to be sympathetic to the topography of the site and to maintain a reasonable sharing of views available from surrounding and nearby properties and those available to the public from nearby public domain areas.	The proposed dual occupancy use will not impact established views from surrounding and nearby residential properties.	Yes
<b>C1.4 Solar Access</b>	<p>The main private open space of each dwelling and the main private open space of any adjoining dwellings are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21st.</p> <p>Windows to the principal living area of the proposal, and windows to the principal living area of adjoining dwellings, are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21st (that is, to at least 50% of the glazed area of those windows).</p>	As the buildings are existing, the proposed use will not result in additional shadowing.	Yes
<b>C1.5 Visual Privacy</b>	<p>Private open space areas including and living rooms of proposed and any existing adjoining dwellings are to be protected from direct overlooking within 9 metres by building layout, landscaping, screening devices or greater spatial separation as shown in the diagram below (measured from a height of 1.7 metres above floor level).</p> <p>Elevated decks and pools, verandahs and balconies should incorporate privacy screens where necessary</p>	Existing fencing between the dwellings ensures adequate privacy between the dwellings.	Yes



Pittwater 21 DCP clause	Requirement	Proposal	Compliance
	and should be located at the front or rear of the building.		
<b>C1.6 Acoustic Privacy</b>	<p>Noise-sensitive rooms, such as bedrooms, should be located away from noise sources, including main roads, parking areas, living areas and communal and private open space areas and the like.</p> <p>Walls and/or ceilings of dwellings that are attached to another dwelling/s shall have a noise transmission rating in accordance with Part F(5) of the Building Code of Australia. (Walls and ceilings of attached dwellings must also comply with the fire rating provisions of the Building Code of Australia).</p> <p>Noise generating plants including pool/spa motors, air conditioning units and the like shall not produce noise levels that exceed 5dBA above the background noise when measured from the nearest property boundary.</p>	<p>The layout of rooms ensures reasonable acoustic privacy impacts.</p> <p>There is no mechanical plant proposed.</p>	Yes
<b>C1.7 Private Open Space</b>	<p>Minimum 80m<sup>2</sup> of private open space per dwelling at ground level, with no dimension less than 3 metres. No more than 75% of this private open space is to be provided in the front yard.</p> <p>Within the private open space area, a minimum principal area of 16m<sup>2</sup> with a minimum dimension of 4m and grade no steeper than 1 in 20 (5%).</p>	<p><u>Front dwelling:</u> There is ground level open space available at the side, front and rear of the principal dwelling.</p> <p>There is a minimum principal area of more than 16m<sup>2</sup> with a minimum dimension of 4m at level grade available at the rear of the dwelling.</p> <p><u>Rear dwelling:</u> A total of 70m<sup>2</sup> open space is provided for the rear, smaller dwelling at both the front and rear of the dwelling. While</p>	<p>Yes</p> <p>No</p>



Pittwater 21 DCP clause	Requirement	Proposal	Compliance
	<p>Dwellings are to be designed so that private open space is directly accessible from living areas enabling it to function as an extension of internal living areas.</p> <p>Private open space areas are to have good solar orientation (i.e. orientated to the north-east or north-west where possible). Where site or slope constraints limit optimisation of orientation, the private open space area must have access to some direct sunlight throughout the year (see Solar Access).</p> <p>Private open space should be located to the rear of the dwelling to maximise privacy for occupants.</p>	<p>slightly under the required amount, the areas are suitably dimensioned and level to provide usable areas.</p>	
<b>C1.8 Dual occupancy specific controls</b>	2 storey for one dwelling, 1 storey for the other dwelling	Front – storey Rear – 1 storey	Yes
	Maximum FSR 0.4:1	FSR – 0.4:1 (existing) Front GFA – 314m <sup>2</sup> Rear GFA – 78.8m <sup>2</sup>	Yes

Table 4. Compliance Table Section C1 Design Criteria for Residential Development

#### 4.4.3 Section D5 Elanora Heights Locality specific controls:

An assessment of the proposed development against the relevant Section D5 controls of P21DCP is outlined below.

Built Form Control	Requirement	Proposed	Compliance
<b>D5.1 Character as viewed from a Public Place</b>	Buildings that front the street must have a street presence and incorporate design elements (such as roof forms, textures, materials, the arrangement of windows,	There is no change to the built form under the DA. The unauthorised building works (subject of the BIC) are not visible from the street.	<b>Yes</b>





Built Form Control	Requirement	Proposed	Compliance
	modulation, spatial separation, landscaping, etc.) that are compatible with any design themes for the locality. Blank street frontage facades without windows shall not be permitted.  Walls without articulation shall not have a length greater than 8 metres to any street frontage.		
<b>D5.3 Building colours and materials</b>	External colours and materials shall be dark and earthy tones  White, light coloured, red or orange roofs and walls are not permitted.  Finishes are to be of a low reflectivity.	There is no change to the built form under the DA.  The unauthorised building works (subject of the BIC) are mainly internal. The building materials of the converted garage match those of the two storey dwelling.	Yes
<b>D12 Fences</b>	No masonry fences will be permitted on land identified in High Flood Hazard Areas or on land within a Floodway.	There are no fences proposed with this application.	Yes

Table 5. Compliance Table Section D Design Criteria for Residential Development

#### 4.4.4 Detailed assessment

The Environmental Planning and Assessment Amendment Act, which commenced on 1 March 2013, has clarified the purpose and status of development control plans, being to '*provide guidance*' to proponents and Councils in achieving land use zone objectives and facilitating permissible development under an environmental planning instrument.

Furthermore, to assist in the assessment of development applications, the amended legislation states that where a proposal does not comply with DCP controls, the consent authority is to be '*flexible in applying those provisions*' and allow for

'reasonable alternative solutions' that achieve the objectives of those standards for dealing with that aspect of the development.

It is important to recall these revisions to the status and application of DCPs in development assessment.

Section 4.15C, subsection (3A) of the EP&A Act provides the following:

*(3A) Development control plans*

*If a development control plan contains provisions that relate to the development that is the subject of a development application, the consent authority:*

- (a) if those provisions set standards with respect to an aspect of the development and the development application complies with those standards—is not to require more onerous standards with respect to that aspect of the development, and*
- (b) if those provisions set standards with respect to an aspect of the development and the development application does not comply with those standards—is to be **flexible in applying those provisions and allow reasonable alternative solutions that achieve the objects of those standards** for dealing with that aspect of the development, and*
- (c) may consider those provisions only in connection with the assessment of that development application.*

In this subsection, standards include planning controls.

The following table addresses the relevant controls of the PDCP, and the proposals compliance with the control.

## 4.5 Non-compliances

### Boundary setbacks

The minor variations to the rear and side boundary setback controls are considered to be appropriate in this instance for the following reasons:

- The variations are minor with the setbacks provided allowing adequate access for maintenance
- The existing dual occupancy building is single storey and will not result in any unreasonable overshadowing of the adjoining properties nor be of unreasonable bulk or scale.
- The non-compliances are existing with no known detrimental amenity impacts.
- There are other detached buildings with reduced setbacks in the vicinity of the site including 22 and 18 St Andrews Gate, adjoining the site to the south.

### Landscaping

While the site does not strictly comply with the numerical requirements for landscaping, the site complies with the performance criteria as follows:

- The existing landscaping assists in minimising the impact of overlooking and maintains privacy levels between dwellings;

- The rear occupancy is single storey and has limited visibility when viewed in the street;
- All on-site vegetation is retained;
- There will be no impacts on trees on adjoining properties.

In addition, the two canopy trees in the front yard contribute to the landscaped setting of the site.

The proposed use of the dual occupancy building is satisfactory with regards to the objectives for landscaping.

## 5 Conclusion

This SEE supports a development application for the use of the existing buildings as a detached dual occupancy at 170 Powderworks Road, Elanora Heights.

The merits of this application have been identified in this assessment under Section 4.15 of the EP&A Act, PLEP and P21DCP.

The proposed dual occupancy use provides an appropriate use for the large site and is in keeping with the character of the locality. There will be no unacceptable amenity impacts on surrounding properties.

The proposal satisfies the objectives of the Council's development controls and is recommended for approval.