

**STATEMENT OF ENVIRONMENTAL EFFECTS**

**FOR DEMOLITION OF EXISTING DWELLING, CONSTRUCTION OF A NEW  
DWELLING AND SWIMMING POOL**

**LOCATED AT**

**73 WIMBLEDON AVENUE, NORTH NARRABEEN**

**FOR**

**PETER & JACQUELINE LOVEDAY**



**Prepared  
December 2021**

## **Table of Contents**

1.0	Introduction .....	3
2.0	Property Description .....	3
3.0	Site Description .....	4
4.0	The Surrounding Environment .....	7
5.0	Proposed Development .....	8
6.0	Zoning and Development Controls .....	9
6.1	State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 .....	9
6.2	State Environmental Planning Policy (Coastal Management) 2018 .....	9
6.3	Pittwater Local Environmental Plan 2014 .....	12
6.4	Pittwater 21 Development Control Plan .....	17
6.4.1	Shaping Development in Pittwater– Desired Character .....	17
6.4.2	Part B General Controls .....	18
6.4.3	Part C Development Type Controls .....	22
6.4.4	Part D Locality Specific Development Controls.....	26
7.0	Matters for Consideration under Section 4.15 of The Environmental Planning and Assessment Act, 1979 .. .....	33
7.1	The provisions of any environmental planning instrument .....	33
7.2	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 .....	33
7.3	Any development control plan.....	33
7.4	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.....	33
7.5	The regulations (to the extent that they prescribe matters for the purposes of this paragraph), .....	33
7.6	The likely impacts of that development, including environmental impacts on both the natural and built environments, and the social and economic impacts in the locality. ....	34
7.7	The suitability of the site for the development.....	34
7.8	Any submissions made in accordance with this Act or the regulations .....	34
7.9	The public interest.....	34
8.0	Conclusion .....	35
Annexure – Clause 4.6 Submission		

## 1.0 Introduction

This Statement of Environmental Effects accompanies details prepared on behalf of Mr Peter & Mrs Jacqueline Loveday by Archisoul Architects, Project No 3110, Sheets DA00 – DA21, dated 30 November 2021, to detail the demolition of an existing dwelling and construction of a new two-storey dwelling with a swimming pool on the existing parcel of land at **73 Wimbledon Avenue, North Narrabeen**.

This Statement describes the subject site and the surrounding area, together with the relevant planning controls and policies relating to the site and the type of development proposed. As a result of this assessment it is concluded that the development of the site in the manner proposed is considered to be acceptable and is worthy of the support of the Council.

In preparation of this document, consideration has been given to the following:

- *The Environmental Planning and Assessment Act, 1979 as amended.*
- *The Environmental Planning and Assessment Regulation 2000.*
- *State Environmental Planning Policy (Coastal Management) 2018*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *Pittwater Local Environmental Plan 2014*
- *Pittwater 21 Development Control Plan 2014*

A Pre-Lodgement Meeting, No. PLM2021/0047 was held with Council officers on 11 March 2021. Several items were discussed at the meeting, including the extent of works located within the Foreshore Area, compliance with the front setback control, and potential privacy impacts to No 75 Wimbledon Avenue.

The proposed design has been prepared to respond positively to the issues raised in the PLM discussions.

## 2.0 Property Description

The subject allotment is described as 73 Wimbledon Avenue, North Narrabeen, being Lot 17 within Deposited Plan 17768. The property is zoned E4 Environmental Living under the Pittwater Local Environmental Plan 2014.

The land is noted as being High & Medium Flood Category affected. Accordingly, a Preliminary Flood Report has been prepared by Pittwater Data Services Pty Ltd, Reference No. PDS22112021: 73WIMB:NARR, dated 22<sup>nd</sup> November 2021. This will be discussed further within this submission.

The site is also identified on Council's Biodiversity Map, Foreshore Building Line Map and Acid Sulfate Soils Map – Class 3. These issues will be discussed further within this submission.

The site is not listed as a Heritage Item nor is the area noted as being within a Heritage Conservation Area or Bushfire Prone Land.

### 3.0 Site Description

The property is located on the western side of Wimbledon Avenue, with a rear, western boundary to Narrabeen Lagoon.

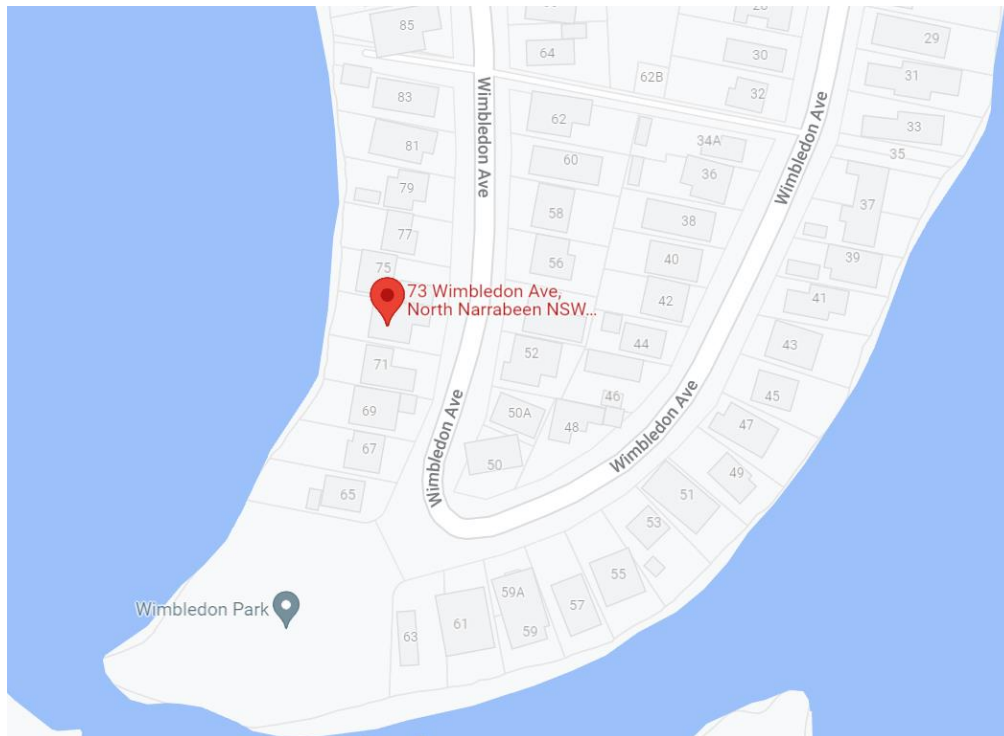
The site is generally rectangular in shape, with a frontage of 15.195m to Wimbledon Avenue. The northern and southern side boundaries measure 40.05m and 40.54m respectively. The rear boundary to the foreshore is approximately 16m and the total site area is 642m<sup>2</sup>.

The site has a slight fall towards the western boundary facing Narrabeen Lagoon, with collected stormwater to be directed to Narrabeen Lagoon in accordance with the Civil Design prepared by Civil and Structural Engineering Design Services Pty Ltd, dated 9 November 2021.

The site is currently developed with a one and two storey brick dwelling with tile roof, together with an attached garage. Vehicular access is currently provided to the garage via a concrete driveway from Wimbledon Avenue.

This section of Wimbledon Avenue has no kerb & guttering and often driveway crossings are unformed.

The details of the site are included on the survey plan prepared by Waterview Surveying Services, Reference No. 1244 dated 30 November 2020, which accompanies the DA submission.



**Fig 1: Location of subject site  
(Source: Google Maps)**



**Fig 2: Existing site photos**  
(Source: Archisoul Architects)



**Fig 3: View of the subject site, looking west from Wimbledon Avenue**





**Fig 4: View looking north-west towards the subject site**



**Fig 5: View looking south-west towards the adjacent sites at 69 & 71 Wimbledon Avenue, including existing car parking facilities within the front setback**

#### 4.0 The Surrounding Environment

The general vicinity of the site is characterised by low density residential development of typically one to two storey dwellings of a variety of styles and scales of development.

The neighbouring properties are commonly single and two storey dwellings, of a similar size and scale to the subject dwelling. The dwellings are of a low scale and set in landscaped gardens.



**Fig 6: Aerial view of subject site and surrounds**  
(Source: Google Maps)

## 5.0 Proposed Development

As detailed within the accompanying plans, the proposal seeks consent for the demolition of the existing structures and the construction of a new two storey dwelling, including an attached double garage, driveway and swimming pool.

In particular, the works comprise:

### Ground Floor

- Proposed new ground floor level to provide for attached double garage, internal lift shaft, internal stair access to proposed first floor, guest bedroom with ensuite, walk-in robe and wet bar, laundry, W.C, study, open plan living, kitchen, dining and butlers pantry.

### First Floor

- Proposed new first floor level to provide for four bedrooms including bedroom, master suite with walk-in robe, ensuite and rear facing balcony, rumpus room with rear facing balcony, bathroom, two bedrooms with walk in robes, ensuites and front balconies.
- Internal lift shaft and stair access to ground floor.

### External Works

- Attached double garage
- New driveway
- New inground swimming pool
- New landscaping

The new dwelling will generally be constructed of a combination of natural stone cladding, weatherboard wall cladding, light grey roof tiles and a pitched colourbond metal sheet roof with extended eave overhangs.

The proposal results in the following indices:

<b>Site Area:</b>	642m <sup>2</sup>
<b>Soft landscaped area:</b>	237m <sup>2</sup> or 36.9% (Inclusive of permissible variations - See DCP discussion).



## 6.0 Zoning and Development Controls

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

The proposal meets water, thermal and energy standards required by BASIX. A BASIX certificate has been submitted with the development application.

### 6.2 State Environmental Planning Policy (Coastal Management) 2018

The subject site has been identified as being within the coastal zone and therefore SEPP (Coastal Management) 2018 is applicable to the proposed development.

The stated Aim of the Policy under Clause 3 is to:

*The aim of this Policy is to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the Coastal Management Act 2016, including the management objectives for each coastal management area, by:*

- (a) managing development in the coastal zone and protecting the environmental assets of the coast, and*
- (b) establishing a framework for land use planning to guide decision-making in the coastal zone, and*
- (c) mapping the 4 coastal management areas that comprise the NSW coastal zone for the purpose of the definitions in the Coastal Management Act 2016.*

The Coastal Management Act 2016 states within **Clause 3**:

The **objects** set out in **Clause 3** of the Coastal Management Act 2016 are:

- (a) to protect and enhance natural coastal processes and coastal environmental values including natural character, scenic value, biological diversity and ecosystem integrity and resilience, and*
- (b) to support the social and cultural values of the coastal zone and maintain public access, amenity, use and safety, and*
- (c) to acknowledge Aboriginal peoples' spiritual, social, customary and economic use of the coastal zone, and*
- (d) to recognise the coastal zone as a vital economic zone and to support sustainable coastal economies, and*
- (e) to facilitate ecologically sustainable development in the coastal zone and promote sustainable land use planning decision-making, and*
- (f) to mitigate current and future risks from coastal hazards, taking into account the effects of climate change, and*
- (g) to recognise that the local and regional scale effects of coastal processes, and the inherently ambulatory and dynamic nature of the shoreline, may result in the loss of coastal land to the sea (including estuaries and other arms of the sea), and to manage coastal use and development accordingly, and*

- (h) *to promote integrated and co-ordinated coastal planning, management and reporting, and*
- (i) *to encourage and promote plans and strategies to improve the resilience of coastal assets to the impacts of an uncertain climate future including impacts of extreme storm events, and*
- (j) *to ensure co-ordination of the policies and activities of government and public authorities relating to the coastal zone and to facilitate the proper integration of their management activities, and*
- (k) *to support public participation in coastal management and planning and greater public awareness, education and understanding of coastal processes and management actions, and*
- (l) *to facilitate the identification of land in the coastal zone for acquisition by public or local authorities in order to promote the protection, enhancement, maintenance and restoration of the environment of the coastal zone, and*
- (m) *to support the objects of the Marine Estate Management Act 2016.*

It is submitted that the assessment detailed under the Statement of Environmental Effects suggests that the proposed development is consistent with the objects of the SEPP (Coastal Management) 2018, as set out in Clause 3 of the Coastal Management Act 2016.

The matters for consideration under Division 5 of SEPP (Coastal Management) 2018 are:

### **13 Development on land within the coastal environment area**

- (1) Development consent must not be granted to development on land that is within the coastal environment area unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the following—
  - (a) the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,
  - (b) coastal environmental values and natural coastal processes,
  - (c) the water quality of the marine estate (within the meaning of the [Marine Estate Management Act 2014](#)), in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,
  - (d) marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,
  - (e) existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,
  - (f) Aboriginal cultural heritage, practices and places,
  - (g) the use of the surf zone.

The proposed demolition and construction of a new dwelling is considered to satisfy the provisions of clause 13, subclause (1) with respect to ensuring the integrity and resilience of the biophysical, hydrological and ecological

environment. The coastal environmental values and natural coastal processes will remain unaffected.

**14 Development on land within the coastal use area**

- (1) Development consent must not be granted to development on land that is within the coastal use area unless the consent authority—
- (a) has considered whether the proposed development is likely to cause an adverse impact on the following—
- i. existing, safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,
  - ii. overshadowing, wind funnelling and the loss of views from public places to foreshores,
  - iii. the visual amenity and scenic qualities of the coast, including coastal headlands,
  - iv. Aboriginal cultural heritage, practices and places,
  - v. cultural and built environment heritage, and
- (b) is satisfied that—
- i. the development is designed, sited and will be managed to avoid an adverse impact referred to in paragraph (a), or
  - ii. if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or
  - iii. if that impact cannot be minimised—the development will be managed to mitigate that impact, and
  - iv. has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development

The development provides for a typical, low-density residential dwelling the is designed sympathetically to the coastal environment, ensuring continued compliance with the provisions of clause 14, subclause 1.

**15 Development in coastal zone generally—development not to increase risk of coastal hazards**

*Development consent must not be granted to development on land within the coastal zone unless the consent authority is satisfied that the proposed development is not likely to cause increased risk of coastal hazards on that land or other land.*

The proposal provides for the construction of a new dwelling. The proposed new works provide a sympathetic two storey dwelling that is consistent with the established area and do not require significant disturbance to the site. The proposal is therefore not considered to increase the risk of coastal hazards for the subject property or adjoining land.

The assessment has concluded that the proposed development is consistent with the matters for consideration under the SEPP (Coastal Management) 2018.

### 6.3 Pittwater Local Environmental Plan 2014

The site is zoned E4 Environmental Living under the provisions of the PLEP 2014.



**Fig 7: Extract of Pittwater Local Environmental Plan 2014**

The development of and use of the land for residential purposes within the E4 Environmental Living Zone is consistent with the zone objectives, which are noted as:

- *To provide for low-impact residential development in areas with special ecological, scientific or aesthetic values.*
- *To ensure that residential development does not have an adverse effect on those values.*
- *To provide for residential development of a low density and scale integrated with the landform and landscape.*
- *To encourage development that retains and enhances riparian and foreshore vegetation and wildlife corridors*

It is considered that the proposed new dwelling will be consistent with the desired future character of the surrounding locality for the following reasons:

- The proposal will be consistent with and complement the existing detached style housing within the locality.
- The proposed two storey scale of the development respects the scale and form of other new development in the vicinity and therefore complements the locality.
- The proposal provides for a new dwelling within an area that is undergoing renewal with new housing stock common, which will not have any substantial impact to the neighbouring properties.
- The setbacks are compatible with the existing surrounding development.
- The proposal does not have any impact on long distance views.



### **Clause 4.3 – Height of Buildings**

The maximum building height in this portion of North Narrabeen is 8.5m. As the site is affected by a flood planning level, the maximum permissible height is 8.0m above the FPL of RL 3.55AHD.

The proposed roof level is generally at RL 11.55m and as such the proposed building height will be 8m, which complies with the 8.0m maximum height above the flood planning level.

### **Clause 7.1 - Acid sulfate soils**

the site has been identified as being within a Class 3 acid sulfate zone.

*Class 3 - Works more than 1 metre below the natural ground surface  
Works by which the watertable is likely to be lowered more than 1 metre below  
the natural ground surface.*

The works will not see any substantial disturbance to the site, with the excavation limited to the proposed swimming pool. It is not anticipated that the works will result in the works lowering the local water table by more than 1m.

### **Clause 7.2 – Earthworks**

The proposal will not require any significant excavation of the site.

### **Clause 7.3 - Flood Planning**

The site has been identified on Council's Flood Risk Map as Medium/High Hazard. A Flood Risk Management Report has been prepared by Pittwater Data Services Pty Ltd, Reference No. PDS22112021: 73WIMB:NARR, dated 22<sup>nd</sup> November 2021 and has been provided to address the provisions of this Clause.

The report concludes that the proposed developments are suitable for the site and the site can achieve the Acceptable Risk Management Criteria of Council's Flood Planning Policy.

### **Clause 7.6 - Biodiversity Protection**

The site has been identified on Council's Biodiversity Map. Saltmarsh and foreshore vegetation have been noted as affecting the land. The proposal does not seek to remove any protected species.

### **Clause 7.8 - Limited development on foreshore area.**

The site is noted as being affected by Council's Foreshore Building Line Map.

The foreshore area is defined as:

*foreshore area means the land between the foreshore building line and the mean high-water mark of the nearest natural waterbody shown on the Foreshore Building Line Map.*

Clause 7.8 notes as its Objectives:

(1) The objectives of this clause are as follows:

- (a) to ensure that development in the foreshore area will not impact on natural foreshore processes or affect the significance and amenity of the area,*
- (b) to ensure continuous public access along the foreshore area and to the waterway.*

Clause 7.8 (2) notes that development consent can only be granted for certain development within the foreshore area, including:

....

- a) the extension, alteration or rebuilding of an existing building wholly or partly in the foreshore area, if the levels, depth or other exceptional features of the site make it appropriate to do so,*

In this instance, the works involve demolition and construction of a new dwelling which will be predominantly located landward of the foreshore building line area. The rear deck, swimming pool, stairs and fire pit area located within the foreshore area.

The aerial photo of the area notes a range of existing structures within the foreshore building line area. Given the modest height and open form of the works within the foreshore area, the proposal is considered to be reasonable in this instance.

A submission under Clause 4.6 has been prepared to address the new works within the Foreshore Building Line Area and is included as an appendix to this statement.

Clause 7.8 (3) notes the following matters to be addressed to the satisfaction of the consent authority to permit the issue of development consent:

- (3) Development consent must not be granted under this clause unless the consent authority is satisfied that:*
  - (a) the development will contribute to achieving the objectives for the zone in which the land is located, and*

**Comment:**

As discussed in this Statement, the demolition of existing dwelling and construction of a new dwelling will achieve the Objectives of the E4 Environmental Living Zone.

- (b) the appearance of any proposed structure, from both the waterway and adjacent foreshore areas, will be compatible with the surrounding area, and*

**Comment:**

The proposal will see the construction of new two storey dwelling which complies with

Council's minimum floor level requirement in the flood zone and present a well-modulated building form. The proposal will maintain a compatible height and scale to its neighbours and with the articulated form of the building, the new dwelling is appropriate for the locality.

- (c) *the development will not cause environmental harm such as:*
  - (i) *pollution or siltation of the waterway, or*
  - (ii) *an adverse effect on surrounding uses, marine habitat, wetland areas, fauna and flora habitats, or*
  - (iii) *an adverse effect on drainage patterns, or*
  - (iv) *the removal or disturbance of remnant riparian vegetation, and*

**Comment:**

The proposed stormwater provisions will restrict any direct impacts to the waterway. All plumbing fixtures will be connected to the Sydney Water sewer.

- (d) *the development will not cause congestion or generate conflict between people using open space areas or the waterway, and*

**Comment:**

The proposal will not see any change to the public's opportunity to access the waterfront.

- (e) *opportunities to provide continuous public access along the foreshore and to the waterway will not be compromised, and*

**Comment:**

Currently there is limited public access to the foreshore area. The new structures will not provide any constraint to future access to the public foreshore area.

- (f) *any historic, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance of the land on which the development is to be carried out and of surrounding land will be maintained, and*

**Comment:**

There are no specific historical, cultural, social, archaeological or architectural or aesthetic features of significance in the vicinity.

The waterfront locality and the natural setting are considered to be significant contributors to the local character and as the works are wholly within the private land, these features are adequately protected.

Given the modest nature of the works, the proposal is considered to achieve these specific objectives.

- (g) *in the case of development for the alteration or rebuilding of an existing building wholly or partly in the foreshore area, the alteration or rebuilding will not have an adverse impact on the amenity or aesthetic appearance of the foreshore, and*

**Comment:**

The construction of a new dwelling will not see any substantial impact on the amenity and aesthetic appearance of the foreshore.

- (h) *sea level rise, coastal erosion and recession, or change of flooding patterns as a result of climate change, have been considered.*

**Comment:**

The potential impacts of coastal forces have been considered in this submission, where they have relevance to the proposal. The works comply with Council's flood controls for this locality.

**Clause 7.10 - Essential Services**

Development consent must not be granted to development 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:

- *the supply of water,*
- *the supply of electricity,*
- *the disposal and management of sewage,*
- *stormwater drainage or on-site conservation,*
- *suitable vehicular access.*

The site will retain the normal services which are available for re-use by the new dwelling.

There are no other clauses of the PLEP 2014 that are considered to be relevant to the proposed development.



## **6.4 Pittwater 21 Development Control Plan**

Council's Pittwater 21 DCP Part A (Shaping Development in Pittwater), Part B (General Controls), Part C (Development Type Controls) and Part D11 North Narrabeen Locality Statement provides a range of outcomes and controls which form the primary criteria for the control for development within the subject locality.

### **6.4.1 Shaping Development in Pittwater– Desired Character**

The desired outcomes for the North Narrabeen Locality, in which this site falls, are as follows:

*The North Narrabeen locality will remain primarily a low-density residential area with dwelling houses a maximum of two storeys in any one place in all 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 occupancy dwellings will be located on the valley floor on land that has less tree canopy coverage, species and habitat diversity and fewer other constraints to development. Any multi unit 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 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 will be designed to be safe from hazards.*

*The design, scale and treatment of future development within the North Narrabeen commercial centre on Pittwater Road will reflect the status of the centre as the 'gateway' to Pittwater through building design, signage and landscaping, and will reflect principles of good urban design.*

*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.*

It is considered that the proposal is consistent with the desired character of the locality by providing for demolition of an existing dwelling and construction of a new dwelling which do not dominate the streetscape and are consistent with the scale and style of development in the vicinity.

Given the challenges presented by the flood affectation, the proposal has been designed to reflect the existing setbacks provided to all boundaries in the immediate area.

The site will provide for functional off street parking and level recreation spaces.

The building materials and colours will harmonise with the natural environment and will not detract from the existing locality.

#### **6.4.2 Part B General Controls**

The General Controls applicable to the proposed new dwelling are summarised as:

##### ***B3.5 Acid Sulfate Soils***

The controls seek to achieve the outcomes:

*Protection of people. (S)*

*Protection of the natural environment. (En)*

*Protection of private and public infrastructure and assets. (S)*

The site is noted as being affected by Class 3 acid sulphate soils. The excavation works beyond 1m below ground level is limited to the small portion of the pool shell. If acid sulphate soils are encountered, the recommendations of the structural engineer will be observed to ensure that the acid laden soils appropriately addressed and the works manages the potential contamination impacts.

##### ***B3.11 Flood Prone Land***

The controls seek to achieve the outcomes:

*Protection of people. (S)*

*Protection of the natural environment. (En)*

*Protection of private and public infrastructure and assets. (S)*

A flood risk report has been prepared by Pittwater Data Services Pty Ltd to address the requirements of Council's controls.

**B4.15 Saltmarsh Endangered Ecological Community**

The controls seek to achieve the outcomes:

*To conserve and enhance saltmarsh vegetation. (En)*

The works do not require the removal of any locally occurring indigenous plantings from either the private property or from the adjacent public land.

**B5.13 Development on Waterfront Land**

The controls seek to achieve the outcomes:

*Protection of waterways and improved riparian health (En)*

*Stormwater and creek flows are safely managed. (S)*

*Appropriate setback between waterways and development (En)*

The proposed dwelling is sympathetically designed and sited to ensure protection and ongoing health of Narrabeen Lagoon. Stormwater flows from the development will be managed accordingly with stormwater directed to Narrabeen Lagoon in accordance with the civil works plans prepared by the Civil Engineer.

**B5.15 Stormwater**

The controls seek to achieve the outcomes:

*Improve the quality of water discharged to our natural areas to protect and improve the ecological and recreational condition of our beaches, waterways, riparian areas and bushland;*

*Minimise the risk to public health and safety;*

*Reduce the risk to life and property from any flooding and groundwater damage;*

*Integrate Water Sensitive Urban Design measures in new developments to address stormwater and floodplain management issues, maximise liveability and reduce the impacts of climate change.*

*Mimic natural stormwater flows by minimising impervious areas, reusing rainwater and stormwater and providing treatment measures that replicate the natural water cycle*

*Reduce the consumption of potable water by encouraging water efficiency, the reuse of water and use of alternative water sources*

*Protect Council's stormwater drainage assets during development works and to ensure Council's drainage rights are not compromised by development activities.*

The site has a slight fall towards the western boundary facing Narrabeen Lagoon, with collected stormwater to be directed to Narrabeen Lagoon in accordance with the Civil Design prepared by Civil and Structural Engineering Design Services Pty Ltd, dated 9 November 2021.

**B6.1 Access driveways and works on the public road reserve**

The controls seek to achieve the outcomes:

*Safe and convenient access. (S)*  
*Adverse visual impact of driveways is reduced. (En)*  
*Pedestrian safety. (S)*  
*An effective road drainage system. (En, S)*  
*Maximise the retention of trees and native vegetation in the road reserve.*

The site proposes a new vehicular access point. The crossing will ensure a safe and convenient access arrangement.

**B6.2 Internal Driveways**

The controls seek to achieve the outcomes:

*Safe and convenient access. (S)*  
*Reduce visual impact of driveways. (S)*  
*Pedestrian safety. (S)*  
*An effective road drainage system. (En, S)*  
*Maximise the retention of trees and native vegetation.*  
*Reduce contaminate run-off from driveways.*

The proposed driveway will provide appropriate access to the double garage.

**B6.3 Off-street vehicle requirements**

The controls seek to achieve the outcomes:

*An adequate number of parking and service spaces that meets the demands generated by the development.*  
*Functional parking that minimises rainwater runoff and adverse visual or environmental impacts while maximising pedestrian and vehicle safety.*  
*Safe and convenient parking.*

The controls require a minimum of 2 parking spaces for the dwelling.

The proposal will provide for a new double garage which maintains 2 car parking spaces on site in accordance with this clause.



Number of bedrooms per dwelling but not a secondary dwelling		Parking requirements per dwelling
1 bedroom		1 space
2 bedrooms or more		2 spaces

For a Secondary Dwelling a minimum of 1 space is required in addition to existing requirement for the principal dwelling (based on number of bedrooms in principal dwelling).

Minimum dimensions of internal space for on-site parking are:

Single car parking spaces on hard stand and Single Carport	2.4 metre x 5.5 metre with 0.3m minimum clear space each side for access to doors
Enclosed garage(internal dimension)	3.0 metre x 6.0 metre, with 2.4 metre minimum width entry
Multiple side by side carport and enclosed garage(internal dimension)	5.7 metre x 6.0 metre for 2 adjacent vehicles + 2.7 metre width for each additional vehicle with, 2.4 metre minimum width entry per vehicle space

The maximum cross-fall in any direction for an open car parking space is 1:20 (V:H).

### **B8.1 Construction & demolition – excavation and landfill**

The controls seek to achieve the outcomes:

*Site disturbance is minimised. (En)*

*Excavation, landfill and construction not to have an adverse impact. (En)*

*Excavation and landfill operations not to cause damage on the development or adjoining property. (S)*

The proposed works will not require any substantial works to allow for the new dwelling and off street car spaces.

The excavation works for the pool are not significant and will be considered by the Structural Engineer in the development of the structural design.

Appropriate soil barriers will be provided to address any sedimentation issues.

### **B8.2 Construction & Demolition – Erosion and Sediment Management**

The controls seek to achieve the outcomes:

*Waterways, coastal areas, watercourses, drainage systems and the public domain are protected from the transportation of sedimentation from development sites. (En)*

*Reduction of waste throughout all phases of development. (En)*

*Public safety is ensured. (S)*

*Protection of the public domain. (S, En)*

Appropriate sedimentation controls will be implemented throughout construction to prevent transportation of sediment to adjoining properties.

### 6.4.3 Part C Development Type Controls

The Development Controls applicable to the proposed demolition of the existing dwelling and construction of a new two story dwelling and pool development are summarised over as:

#### **C1.1 Landscaping**

The controls seek to achieve the outcome:

- A built form softened and complemented by landscaping. (En)*
- Landscaping reflects the scale and form of development. (En)*
- Retention of canopy trees by encouraging the use of pier and beam footings. (En)*
- Development results in retention of existing native vegetation. (En)*
- Landscaping results in the long-term retention of Pittwater's locally native tree canopy. (En)*
- Landscaping retains and enhances Pittwater's biodiversity by using locally native plant species (En)*
- Landscaping enhances habitat and amenity value. (En, S)*
- Landscaping results in reduced risk of landslip. (En, Ec)*
- Landscaping results in low watering requirement. (En)*

The required controls to achieve the outcomes are to ensure that the development will provide for the reasonable retention and protection of the existing significant trees and to provide for locally occurring species within any proposed replanting of the site.

The proposal will remove only small exotic and introduced weed species. The Landscape Concept Plan prepared by Mandara Landscapes provides a high-quality landscape outcome for the dwelling and within the front and rear yard. The proposed and existing landscaping will preserve the landscaped character of the locality.

#### **C1.2 Safety and Security**

The controls seek to achieve the outcomes:

- On-going safety and security of the Pittwater community. (S)*
- Opportunities for vandalism are minimised. (S, Ec)*

The proposed works will not impact on the existing safety or security of the site. Casual surveillance of the street area will be maintained.

#### **C1.3 View Sharing**

The controls seek to achieve the outcomes:

- A reasonable sharing of views amongst dwellings. (S)*
- Views and vistas from roads and public places to water, headland, beach and/or bush views are to be protected, maintained and where possible, enhanced. (S)*

*Canopy trees take priority over views. (En, S)*

The subject and adjoining properties currently enjoy local views of Narrabeen Lagoon. Given the compliant overall height of the new works, no significant or unreasonable impacts to the outlook of the neighbouring properties are expected.

#### **C1.4      Solar Access**

The controls seek to achieve the outcomes:

*Residential development is sited and designed to maximise solar access during mid-winter. (En)*

*A reasonable level of solar access is maintained to existing residential properties, unhindered by adjoining development. (En)*

*Reduce usage and/dependence for artificial lighting. (En)*

The required controls to achieve the outcomes are to ensure that private open spaces of the subject and adjoining dwellings maintain a minimum of 3 hours of solar access in mid winter.

The proposal will not see the unreasonable overshadowing of the adjoining property to the south and maintain sufficient residential amenity for the southern property by ensuring solar access to private open space and principal living areas. .

#### **C1.5      Visual Privacy**

The controls seek to achieve the outcomes:

*Habitable rooms and outdoor living areas of dwellings optimise visual privacy through good design. (S)*

*A sense of territory and safety is provided for residents. (S)*

The required controls to achieve the outcomes are to ensure that the private open space, recreation areas and living rooms within 9m of a development are suitably protected to limit the effects of direct overlooking.

The proposal provides principal living areas at the ground floor level with privacy screening to be provided to the deck area to the rear.

The upper floor bedrooms and associated bathroom have limited openings to the south and north to preserve the privacy and amenity for the neighbours.

No significant loss of privacy or amenity for the neighbours is anticipated as properties in this area experience a reasonable extent of common overlooking of yard areas.

### **C1.6 Acoustic Privacy**

The controls seek to achieve the outcomes:

*Noise is substantially contained within each dwelling and noise from any communal or recreation areas are limited. (S)*

*Noise is not to be offensive as defined by the Protection of the Environment Operations Act 1997, including noise from plant, equipment and communal or recreation areas (S)*

The required controls to achieve the outcomes are to ensure that noise sensitive living areas and bedrooms are located away from major noise sources.

Given the residential nature of the works, there will not be any significant Impact on the surrounding locality in terms of acoustic privacy. The garage is located immediately adjacent to the street frontage with ample separation to living areas of adjoining properties thereby maintaining existing levels of acoustic privacy.

### **C1.7 Private Open Space**

The controls seek to achieve the outcomes:

*Dwellings are provided with a private, usable and well-located area of private open space for the use and enjoyment of the occupants. (S)*

*Private open space is integrated with, and directly accessible from, the living areas of dwellings. (S)*

*Private open space receives sufficient solar access and privacy (En, S).*

The required controls to achieve the outcomes are to ensure that dwellings are provided suitable private open space with an area and at a grade which will facilitate outdoor private recreation. The new low pool and rear landscaping in the rear yard will supplement the character of the site and wider area.

The perimeter of the yard can be provided with supplementary planting which will further preserve neighbour amenity.

### **C1.9 Adaptable Housing and Accessibility**

The controls seek to achieve the outcomes:

*The community's lifecycle housing needs are met within Pittwater through well designed adaptable housing. (S)*

*All members of the community enjoy equitable access to buildings to which the general public have access. (S)*

*Housing for older people and people with a disability are accessible, adaptable and safe. (S)*

*Equitable access in the public domain. (S)*

Single dwellings are not required to provide access in accordance with AS4299-1995.

**C 1.12 Waste and Recycling Facilities**

The controls seek to achieve the outcomes:

*Waste and recycling facilities are accessible and convenient, and integrate with the development. (En)*

*Waste and recycling facilities are located such that they do not adversely impact upon amenity of the land adjoining development or natural environment. (En, S)*

The required controls to achieve the outcomes are to ensure that adequate area remains for the storage of waste and recyclable materials. There is sufficient area within the site for the on-site storage of waste and recyclables, with the waste removed by Council contractors via the household garbage service.

**C 1.17 Swimming pool safety**

The controls seek to achieve the outcomes:

*The promotion of personal safety. (S)*

*Compliance with Swimming Pools Act 1992 and Regulations (En, S)*

The required controls to achieve the outcomes are to ensure that swimming pools are provided with suitable fencing in accordance with the Swimming Pools Act 1992. The proposal will provide for a perimeter fence to the swimming pool, which maintains an effective barrier between the dwelling and the pool.

#### 6.4.4 Part D Locality Specific Development Controls

The **D11 North Narrabeen Locality Statement** contains a number of outcomes for development. The proposal has been assessed in regard to the Locality Statement and is summarised in the following table.

In support of the proposal, it is considered that this proposal is well designed, comprehensive and consistent with the community's vision for development in Pittwater in that it is:

- Proposing a form of development which is compatible with the existing residential character of the area by maintaining an appropriate development scale which is compatible with the vicinity.
- The proposal maintains existing views and amenity to adjoining properties.
- The proposal will not result in significant additional run-off to adjoining properties or public spaces.
- The development will not place additional demands on local infrastructure or on the sewage disposal system for the site.

A summary of the DCP controls for the **D11 North Narrabeen Locality** is provided below:

##### **D11.1 Character As Viewed From A Public Place**

The control seeks to achieve the outcomes:

*To achieve the desired future character of the Locality.*

*To ensure new development responds to, reinforces and sensitively relates to the spatial characteristics of the existing built and natural environment. (En, S, Ec)*

*To enhance the existing streetscapes and promote a scale and density that is in keeping with the height of the natural environment.*

*The visual impact of the built form is secondary to landscaping and vegetation, or in commercial areas and the like, is softened by landscaping and vegetation. (En, S, Ec)*

*High quality buildings designed and built for the natural context and any natural hazards. (En, S)*

*Buildings do not dominate the streetscape and are at 'human scale'. Within residential areas, buildings give the appearance of being two-storey maximum. (S)*

*To preserve and enhance district and local views which reinforce and protect the Pittwater's natural context.*

*To enhance the bushland vista of Pittwater as the predominant feature of the landscape with built form, including parking structures, being a secondary component.*

*To ensure that development adjacent to public domain elements such as waterways, streets, parks, bushland reserves and other public open spaces, compliments the landscape character, public use and enjoyment of that land. (En, S)*

The required controls to achieve the outcomes are to ensure that the building achieve

a compatibility with the locality through appropriate design relief including roof forms textures, materials, the arrangement of windows, modulation of wall and roof planes, spatial separation, landscaping etc.

The application seeks consent for demolition and construction of a new dwelling, which will respect and maintain the predominant character of the locality.

The elevations provided with the DA submission confirm that the proposed dwellings' roof line will be complimentary in terms of bulk and scale to the existing surrounding development, which generally comprises one and two storey dwellings that are orientated towards Narrabeen Lagoon.

The setbacks provided generally reflect the setbacks of the nearby properties.

#### **D11.2 Scenic protection - General**

The controls seek to achieve the outcomes:

*To achieve the desired future character of the Locality.  
Bushland landscape is the predominant feature of Pittwater with the built form  
being the secondary component of the visual catchment. (En, S)*

The new works are modest in their scale and with an open style with well modulated floor level and setbacks, will not introduce a prominent built form in the immediate area.

#### **D11.3 Building Colours and Materials**

The controls seek to achieve the outcomes:

*To achieve the desired future character of the Locality.  
The development enhances the visual quality and identity of the streetscape. (S)  
To provide attractive building facades which establish identity and contribute to the  
streetscape.  
To ensure building colours and materials compliments and enhances the visual  
character its location with the natural landscapes of Pittwater.  
The colours and materials of the development harmonise with the natural  
environment. (En, S)  
The visual prominence of the development is minimised. (S)  
Damage to existing native vegetation and habitat is minimised. (En)*

The required controls to achieve the outcomes are to ensure that the external colours and materials shall be dark and earthy tones as indicated within the DCP.

It is considered that the development is appropriate as the proposal will utilise finishes and colours which have been detailed in the DA submission.



#### **D11.6 Front Building Line**

The controls seek to achieve the outcomes:

*Achieve the desired future character of the Locality. (S)*  
*Equitable preservation of views and vistas to and/or from public/private places. (S)*  
*The amenity of residential development adjoining a main road is maintained. (S)*  
*Vegetation is retained and enhanced to visually reduce the built form. (En)*  
*Vehicle manoeuvring in a forward direction is facilitated. (S)*  
*To enhance the existing streetscapes and promote a scale and density that is in keeping with the height of the natural environment.*  
*To encourage attractive street frontages and improve pedestrian amenity.*  
*To ensure new development responds to, reinforces and sensitively relates to the spatial characteristics of the existing urban environment*

The control to achieve this outcome is to provide a setback of 6.5m, or the established building line to the street frontage.

The proposed dwelling will be situated 5m from the eastern street frontage to the proposed garage and front verandah at the ground floor and balcony on the first floor.

The site is considered highly constrained due to the location of the foreshore building line and 6.5m front building line. The streetscape along Wimbledon Avenue consists of varying front setbacks depending on the age of the dwelling. There is evidence of more recent development being situated within the 6.5m front building line control.

Notwithstanding the variation, the proposed front building line does not give rise to an unreasonable degree of bulk and scale, with the built form maintaining a consistency with the established built form along Wimbledon Avenue. The front setback area provides sufficient deep soil area with opportunity provided for future landscaping to minimise any visual impact.

The front building line does not prohibit opportunity for views and/or vistas from adjoining or nearby properties, while promoting a sense of scale and density that is commensurate with the surrounding area. Overall, the front building line and development as a whole provides an attractive street frontage that improves the pedestrian experience and general amenity.

The proposal is considered to satisfy the outcomes of the control, therefore deemed to be satisfactory and supportable on merit.

#### **D11.7 Side and rear building line**

The controls seek to achieve the outcomes:

*To achieve the desired future character of the Locality. (S)*  
*The bulk and scale of the built form is minimised. (En, S)*

*Equitable preservation of views and vistas to and/or from public/private places. (S)*  
*To encourage view sharing through complimentary siting of buildings, responsive design and well-positioned landscaping.*  
*To ensure a reasonable level of privacy, amenity and solar access is provided within the development site and maintained to residential properties. (En, S)*  
*Substantial landscaping, a mature tree canopy and an attractive streetscape. (En, S)*  
*Flexibility in the siting of buildings and access. (En, S)*  
*Vegetation is retained and enhanced to visually reduce the built form. (En)*  
*To preserve and enhance the rural and bushland character of the locality. (En, S)*  
*To ensure a landscaped buffer between commercial and residential zones is established.*

The relevant controls to achieve this outcome are to maintain a minimum side boundary setback of 2.5m for at least one side and min 1.0m setback for the other side.

The dwelling complies with the minimum side setback to the south by providing 1m. However, the proposal is setback 1.5m to the north, resulting in a variation to the minimum 2.5m control. The proposal improves upon the northern setback of the existing dwelling, which is located approximately 1m from the side boundary.

The setback to the north, although reduced, provides suitable articulation and modulation of the built form, including recessed elements on the first floor to minimise any associated visual impact. The northern setback does not result in loss of privacy, solar access or general amenity to the north. Views and vistas from nearby properties will not be impacted by the reduced setback.

Notwithstanding the reduced side building line, the proposal offers adequate articulation of the building form to minimise the visual impact and provide a complimentary design that is consistent with the future character of the locality. The dwelling satisfies the outcomes of the control and the setback is supportable on merit.

#### **D11.9 Building Envelope**

The controls seek to achieve the outcomes:

*To achieve the desired future character of the Locality.*  
*To enhance the existing streetscapes and promote a building scale and density that is below the height of the trees of the natural environment.*  
*To ensure new development responds to, reinforces and sensitively relates to spatial characteristics of the existing natural environment.*  
*The bulk and scale of the built form is minimised. (En, S)*  
*Equitable preservation of views and vistas to and/or from public/private places. (S)*  
*To ensure a reasonable level of privacy, amenity and solar access is provided within the development site and maintained to residential properties. (En, S)*  
*Vegetation is retained and enhanced to visually reduce the built form. (En)*

The required controls to achieve the outcomes are to maintain the development within a height envelope which provides for a height of 3.5m with an angle projected at 45°, above the flood planning level.

The new works will largely comply with these controls. The proposal will be sited within the prescribed building envelope with the exception of the upper extent of the external walls along the northern and southern elevations.

Although non-compliant, the envelope encroachments are not unreasonable. The proposal complies with the prescribed building height control, and the side setbacks are consistent with surrounding dwellings. The encroachments will not give rise to any unreasonable overshadowing or general amenity impacts.

In this instance, the proposed massing of the building is considered to be appropriate and will not unreasonably remove views for any surrounding properties or result in excessive overshadowing.

The low pitch of the roof form assists in reducing the apparent bulk of the building, with the design providing for good articulation in the wall and roof lines.

The proposal is consistent with the outcomes of the control, thereby warranting support of the building envelope variation.

#### ***D11.11 Landscaped Area – Environmentally Sensitive Area***

The controls seek to achieve the outcomes:

- Achieve the desired future character of the Locality. (S)*
- The bulk and scale of the built form is minimised. (En, S)*
- A reasonable level of amenity and solar access is provided and maintained. (En, S)*
- Vegetation is retained and enhanced to visually reduce the built form. (En)*
- Conservation of natural vegetation and biodiversity. (En)*
- Stormwater runoff is reduced, preventing soil erosion and siltation of natural drainage channels. (En)*
- To preserve and enhance the rural and bushland character of the area. (En, S)*
- Soft surface is maximised to provide for infiltration of water to the water table, minimise run-off and assist with stormwater management. (En, S)*

The required controls to achieve the outcomes are to limit residential development in order to maintain a minimum landscaped area of 60% of the site area or 385.2m<sup>2</sup>.

An area of approximately 237m<sup>2</sup> or 36.9% (exclusive of any permitted variations) remains available as landscaped area.

An additional area of low-level timber decking to provide the all-weather entry and outdoor living space at the level of the principal living rooms has been provided to form part of Council's permissible 6% variation for functional outdoor space.

On balance, the site will continue to maintain the outcomes of the clause for the following reasons:

- The proposal will not be highly visible in the locality.
- The proposal does not result in an unreasonable loss of privacy or amenity to the adjoining premises.
- The proposal does not result in the removal of any significant vegetation with new significant landscaping adjacent to the boundaries being provided.
- The overflow from the pool will be drained to the sewer and as such will not increase stormwater run off.

#### **D11.12 Fences - General**

The controls seek to achieve the outcomes:

*To achieve the desired future character of the Locality. (S)*  
*To ensure fences compliment and conserve the visual character of the street and neighbourhood.*  
*To define the boundaries and edges between public and private land between areas of different function.*  
*To contribute positively to the public domain.*  
*An open streetscape that allows casual surveillance of the street. (S)*  
*Fences, where provided, are suitably screened from view from a public place. (S)*  
*Safe sight distances and clear view of the street (including to and from driveways), for motorists and pedestrians. (S)*  
*To ensure heritage significance is protected and enhanced. (S)*  
*To ensure an open view to and from the waterway is maintained. (S)*

The control states front fences and side fences (within the front building setback) shall:

- not exceed a maximum height of 1 metre above existing ground level,
- be compatible with the streetscape character, and
- not obstruct views available from the road.

Further, due to the high flood hazard on the site, no masonry fences will be permitted. All fences in High Flood Hazard Areas or within a Floodway are to be constructed in 'open' materials, for the full height of the fence, to allow for the passage of floodwaters through the fence.

The proposal includes a front fence of 1.2m in height. Notwithstanding the minor fence height variation, the fence compliments the existing streetscape character with evidence of fences with similar styles and heights. The fence is an open-style fence that satisfies the flood requirements for 'open' materials. Overall, the fence is sympathetic to the character of the surrounding area and will contribute to the visual character of the streetscape and public domain area.

***D11.14 Construction, Retaining walls, terracing and undercroft areas***

The controls seek to achieve the outcomes:

*To achieve the desired future character of the Locality.*

*To protect and minimise disturbance to natural landforms.*

*To encourage building design to respond sensitively to natural topography*

The proposal satisfactorily responds to the topography of the site. The works will not see any significant excavation of the site.

**7.0 Matters for Consideration under Section 4.15 of The Environmental Planning and Assessment Act, 1979**

**7.1 The provisions of any environmental planning instrument**

The proposal is subject to the provisions of the Pittwater Local Environmental Plan 2014 and the relevant supporting Council policies. It is considered that the provisions of this environmental planning instrument have been satisfactorily addressed within this report and that the proposal achieves compliance with its provisions.

There are no other environmental planning instruments applying to the site.

**7.2 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**

There are no draft instruments applying to the land.

**7.3 Any development control plan**

The development has been designed to comply with the requirements of Council's Pittwater 21 Development Control Plan.

The application has been prepared having regard to the requirements of Part B, Part C and Part D of the Pittwater 21 DCP.

The development respects the streetscape character objectives of the DCP and will provide a cohesive and sympathetic addition to the site which will make a positive contribution to the area.

It is considered that the proposed design respects the desired character objectives of the DCP in that it reinforces the existing residential character of the area and is compatible with the existing uses in the vicinity.

**7.4 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**

No matters of relevance are raised in regard to the proposed development.

**7.5 The regulations (to the extent that they prescribe matters for the purposes of this paragraph),**

No matters of relevance are raised in regard to the proposed development.

**7.6 The likely impacts of that development, including environmental impacts on both the natural and built environments, and the social and economic impacts in the locality.**

It is considered that the proposal, which seeks consent for demolition of the existing dwelling and its associated structures and the construction of a new two storey dwelling and swimming pool, will not unreasonably impact upon the amenity of adjoining properties or upon the character of the surrounding area. It is considered that the resultant development is compatible with and will complement the residential character of the area.

The proposal is considered to be well designed having regard to the relevant provisions of the Council's PLEP 2014 and Council's Codes and Policies, in particular the Pittwater 21 DCP and the North Narrabeen Locality Statement.

**7.7 The suitability of the site for the development**

The subject land is currently zoned E4 Environmental Living under the Pittwater Local Environmental Plan 2014 and is considered suitable for the proposed development.

**7.8 Any submissions made in accordance with this Act or the regulations**

This is a matter for Council in the consideration of this proposal.

**7.9 The public interest**

The proposal will not impact upon the environment, the character of the locality or upon the amenity of adjoining properties and is therefore considered to be within the public interest.



## **8.0 Conclusion**

The principle objective of this development is to provide for the demolition of an existing residential dwelling and construction of a new dwelling and swimming pool, which will respect and compliment the site's location.

It is considered that the proposed works satisfy the stated objectives of Council's Development Controls. By maintaining our neighbour's amenity and by complimenting the existing style and character of the surrounding locality, the stated objectives have been satisfied.

As the proposed development will not have any significant impact on the environment, scenic quality of the area or the amenity of the adjoining allotments, the issue of Development Consent under the delegation of Council is requested.

### **VAUGHAN MILLIGAN**

Town Planner

Grad. Dip. Urban and Regional Planning (UNE)

## **Appendix A**

Clause 4.6 Submission - Foreshore Building Line