



Statement of Environmental Effects

alterations and additions to
dwelling

6 Coolalie Place, Allambie Heights

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EXECUTIVE SUMMARY

This Statement of Environmental Effects has been prepared to support an application for alterations and additions to dwelling at 6 Coolalie Place, Allambie Heights.

The objective of the development proposal is to deliver a contemporary dwelling in a manner encouraged by the zone objectives and planning controls. The alterations and additions will enhance the functionality of the dwelling and preserve the amenity of neighbours.

Key aspects of the proposal include a modest expansion of the ground level floor plate and construction of a new upper and lower ground level. An enhanced outdoor dining and BBQ area and associated landscape works are proposed.

Our assessment finds that the development proposal is broadly consistent with relevant environmental planning instruments and closely aligns with the objectives and controls contained within relevant planning guidelines, with a justifiable exception to wall height and side boundary envelope controls.

We have provided commentary on core assessment matters including impact on neighbour amenity and wall height and side boundary envelope non-compliances. This report sets out the merits of the proposal in relation to these assessment matters.

The site is designated as “bushfire prone land” on the council’s *Bushfire Prone Land Map*. A Bushfire Risk Assessment Report has been prepared and is supplied at **Appendix C**. The Report addresses the performance standards contained in *Planning for Bushfire Protection 2019*.

Based on our evaluation of the proposal against relevant planning instruments and our detailed consideration of the environmental impacts, we conclude that the proposal is worthy of approval.

1. INTRODUCTION

This Statement of Environmental Effects has been prepared to support an application for alterations and additions to dwelling at 6 Coolalie Place, Allambie Heights.

The objective of the development proposal is to deliver a contemporary dwelling in a manner encouraged by the zone objectives and planning controls. The alterations and additions will enhance the functionality of the dwelling and preserve the amenity of neighbours.

Key aspects of the proposal include a modest expansion of the ground level floor plate and construction of a new upper and lower ground level. An enhanced outdoor dining and BBQ area and associated landscape works are proposed.

The purpose of this document is to evaluate the proposal against relevant planning instruments and to provide a planning assessment of its environmental impacts, as required by section 4.15 of the *Environmental Planning and Assessment Act 1979*.

2. SITE AND CONTEXT

This section describes the characteristics of the land which have informed and influenced the proposal. Here we also describe the characteristics of the locality which have been considered in developing the proposal.

2.1. SITE DESCRIPTION

The site is located at 6 Coolalie Place, Allambie Heights and the land is legally described as Lot 29 in DP 223922. An aerial photograph identifying the site in yellow shading is provided at Figure 1.



Figure 1 | Aerial image
(Source: Six Maps)

2.1.1. Site Characteristics

The site is an irregular lot with a ~12.74m curvilinear frontage to Coolalie Place and an average depth of ~37.7m. The site area is 618sqm. The land has a moderate fall from the rear to Coolalie Place.

A Survey Plan illustrating site dimensions and contours is included at **Appendix A**.

Vegetation at the site is typical of a managed domestic garden in a bushland context and comprises a combination of native and ornamental trees, shrubbery, and ground covers. There are no trees on neighbouring properties likely to be impacted by proposed works.

The site contains a single storey dwelling and detached garage. The floor level of the dwelling is elevated above natural ground owing to site topography. This arrangement is characteristic of dwellings on the high side of Coolalie Place.

The detached garage can accommodate two vehicles and contains ancillary storage. Vehicular access to the site is from Coolalie Place. Stormwater runoff is collected and discharged to a drainage infrastructure in Coolalie Place.

2.1.2. Site Constraints

Slope

The land has a moderate fall from the rear to Coolalie Place with an average slope of ~18%. Site topography is a key design challenge. It is inevitable that the design response will depart from envelope controls which anticipate development on a conventional site.

Bushfire

The site is designated as “bushfire prone land” on the council’s *Bushfire Prone Land Map* as indicated at Figure 2.

A Bushfire Risk Assessment Report has been prepared and is supplied at **Annexure C**. The Report addresses the performance standards contained in *Planning for Bushfire Protection 2019*.

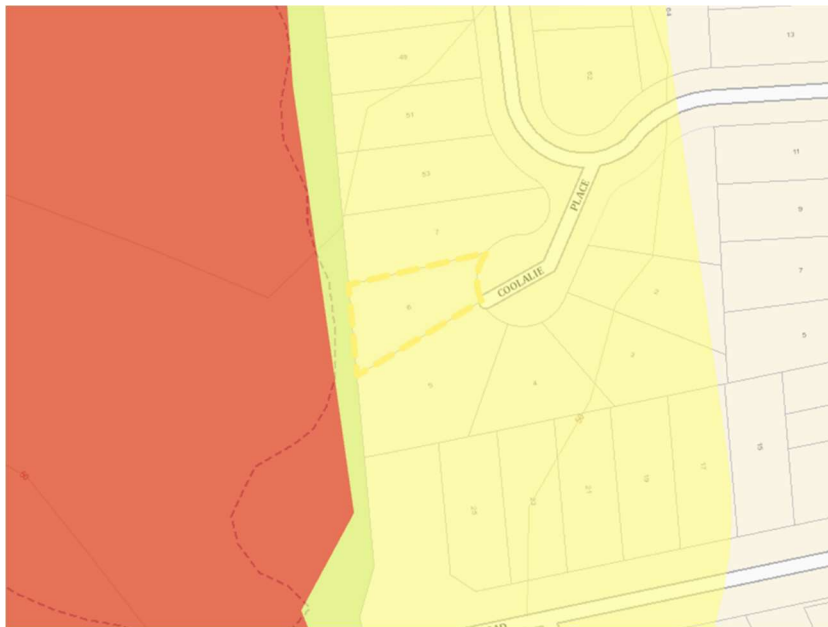


Figure 2 | Bushfire Prone Land Map (Source: NSW Govt.)

Landslip

The site is identified as Area B on the *Landslip Risk Map*.

A Geotechnical Investigation Report has been prepared and is supplied at **Annexure D**. The Report describes subsurface conditions, identifies potential geotechnical hazards, and sets out recommendations to mitigate geotechnical hazards.

There are no constraints that would preclude the delivery of reasonable and sensitively designed alterations and additions to the dwelling. The proposed development has been designed to respond to observed site constraints and limitations.

2.1.3. Site Opportunities

Retaining building fabric

The existing dwelling has a modest yet functional floorplate with level connection to the rear yard. Existing building fabric is in good condition and to demolish the structure would be to waste embodied energy. There is an opportunity to retain building fabric and deliver a reasonably scaled upper-level and lower ground floor addition.

This report describes how the proposed development leverages site opportunities without unduly impacting the residential amenity of neighbours or the low-density character of the locality.

2.2. LOCALITY DESCRIPTION

The site is situated within Northern Beaches Local Government Area in the suburb of Allambie Heights.

2.2.1. Land Use

Land use in the immediate locality is almost exclusively low-density residential.

2.2.2. Building Form

Building form is characterised by single to two-storey dwellings. Several dwellings upslope of the street are elevated above natural terrain and consequently have a three storey scale. The topography in this locality is moderate to severe which influences building form.

There is little uniformity to building arrangement and setbacks in the immediate streetscapes. Dwellings generally respond to unique site conditions. The ratio of built-upon to landscaped area is skewed towards pervious surfaces and consequently the street has a prominent bushland character.

Architectural styles are diverse. In-fill development has occurred sporadically over the decades with older housing stock making way to the occasional contemporary dwelling. Traditional pitched roof forms are prominent.

There is little consistency in the use of external materials. Contemporary dwellings incorporate rendered masonry finishes however older housing stock more typically comprises of face-brick walls and tiled roofs.

The built form character of Coolalie Place and streets beyond is distinguished by creative and site-responsive building design. The range and variety of architectural styles, roof forms and external materials and finishes is central to streetscape character, along with bushland setting.

2.2.3. Adjacent Development

Adjacent development is described as follows:

- **5 Coolalie Place**

Directly to the south with a frontage to Coolalie Place is a two-storey brick dwelling with integrated double garage accessed from Coolalie Place. The site is downslope of the subject site.

The principal private open space is situated on the western side of the dwelling. The private open space comprises a paved terrace space and swimming pool.

- **7 Coolalie Place**

Directly to the north with a frontage to Coolalie Place is a single-storey dwelling. The site is elevated above street level and does not have vehicular access. The site is upslope of the subject site.

The principal private open space is situated on the western side of the dwelling and includes a managed lawn area.

The building arrangement and orientation responds to the siting and location of neighbouring development and is designed to mitigate overshadowing impacts and limit cross-viewing thereby preserving the amenity of neighbours.

3. PROPOSED DEVELOPMENT

This section provides a description of the proposal and should be read in conjunction with accompanying architectural drawings. Here we endeavour to explain how the proposal has been designed to work with site constraints and optimise site opportunities.

3.1. SITE PREPARATION

3.1.1. Demolition

Elements of the existing dwelling including will be demolished to facilitate ground level expansion and upper-level addition. The extent of demolition works is detailed on the architectural plans.

3.1.2. Tree Removal

Trees on site are proposed to be retained, except for ornamental shrubs in the vicinity of the proposed works.

3.1.3. Land Modification

Modest land modification works are proposed including excavation within the building footprint to facilitate delivery of the lower-ground level. Areas of site disturbance are illustrated on the architectural plans.

3.2. BUILDING WORKS

3.2.1. Dwelling

The application proposes alterations and additions to the dwelling including the expansion of the ground level floor plate and construction of a new lower ground and upper level.

A primary living room, kitchen, dining, bathroom, laundry, media room and guest bedroom will be provided at ground floor. The ground level floorplate will extend towards the street and the rear toward the rear boundary. This expansion will optimise the functionality of the living spaces.

A lower ground level is proposed below the ground level dining and entry hall. The existing subfloor clearance means allows for this habitable space to be created without excessive excavation. The lower ground will contain a rumpus space and storage.

A new upper level will be delivered and will contain sleeping quarters, an additional family bathroom and secondary living room. New windows associated with high-use spaces are oriented towards the street or rear yard to mitigate potential for overlooking and for sun protection.

The roof form is a standard hipped roof with modest pitch.

A paved private open space area is proposed in the rear yard. An awning structure will replace project over part of the paved area for weather protection. The private open space has a level connection to the ground level living room.

3.2.2. Parking and Access

The cross-over and driveway from Coolalie Place is to be retained. The detached garage in the front setback area will be retained and provides parking for two vehicles.

3.2.3. Materials

Proposed external materials include light coloured render and grey-toned bagged face-brick. Colorbond roof cladding, downpipes and gutters are proposed. These materials and colours have been selected because they are robust and are compatible with materials evident in the locality.

A schedule of materials and finishes is supplied with the development application.

3.3. ANCILLARY WORKS

3.3.1. Landscaping

Landscaping is proposed and is illustrated in the landscape concept supplied with the architectural plans. The landscape design incorporates an appropriate diversity of trees, shrubs, and ground covers.

3.3.2. Stormwater

Stormwater runoff from the roof and paved surfaces will be directed to drainage infrastructure in Coolalie Place as is presently the case.

3.4. OPERATION

3.4.1. Waste Management

Waste bins will continue to be stored within the detached garage. The bins are concealed from view and do not cause a visual nuisance in this location. Bins can conveniently be moved to the kerb for collection.

4. COMPLIANCE SUMMARY

This section provides an evaluation of the proposal against relevant planning instruments as required by section 4.15(1) of the *Environmental Planning and Assessment Act 1979*.

4.1. ENVIRONMENTAL PLANNING INSTRUMENTS

4.1.1. State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 (SEPP BASIX) applies to BASIX affected development and requires that a BASIX certificate accompany the development application.

The proposed dwelling is BASIX affected development and the cost of alterations and additions will exceed \$50,000. A BASIX certificate accompanies the development application.

4.1.2. State Environmental Planning Policy (Resilience and Hazards) 2021

State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP) states that a consent authority must not consent to development of land unless it has considered whether the land is contaminated and, if contaminated, can be made suitable for the proposed use.

The site has a longstanding history of residential use and is unlikely to contain contaminants that would preclude ongoing residential use. The proposed development involves minimal site disturbance. No further consideration under the R&H SEPP is required.

4.1.3. Warringah Local Environmental Plan 2011

Warringah Local Environmental Plan 2011 (WLEP) applies to the site. The site is within Zone R2 Low Density Residential and the proposed development is permitted with consent. An extract of the zoning map is provided at Figure 3.

The objectives for development in Zone R2 are:

- 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 ensure that low density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah.

The proposed development aligns with the objectives for development in Zone R2 given that alterations and additions will improve existing low density housing stock and enhances landscape setting.



Figure 3 | Zoning Map extract (Source: NSW Govt.)

The proposal is consistent with relevant development standards and provisions contained within WLEP including those relating to building height and development on sloping land.

A compliance summary is provided at Table 1.

Table 1 | WLEP compliance summary

Clause	Standard	Comment	Compliance
4.3 Height of buildings	(2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.	A maximum building height of 8.5m is permitted at the site as indicated on the <i>Height of Buildings Map</i> . The <u>maximum</u> height of the proposed building is 8.5m. Height is variable owing to site topography. The 8.5m building height plane is illustrated on sections supplied with the architectural plans.	Yes
5.10 Heritage conservation	(5) Heritage assessment The consent authority may, before granting consent to any development— (a) on land on which a heritage item is located, or	The site is adjacent to land mapped as heritage conservation area (HCA) C9 “Manly Dam and surrounds”. The heritage inventory form indicates that significance relates primarily to the dam and	Yes

Clause	Standard	Comment	Compliance
	<p>(b) on land that is within a heritage conservation area, or</p> <p>(c) on land that is within the vicinity of land referred to in paragraph (a) or (b), require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</p>	<p>dam infrastructure. Bushland setting contributes to aesthetic significance.</p> <p>The proposed development will not impinge upon the visual catchment of the dam or associated dam infrastructure. The works will have not impact on the bushland setting of the dam.</p> <p>A formal heritage management document is not required to assess heritage impact in this scenario. The consent authority can be satisfied that works are designed to align with the objectives of clause 5.10.</p>	
6.2 Earthworks	<p>(3) Before granting development consent for earthworks, the consent authority must consider the following matters—</p> <p>(a) the likely disruption of, or any detrimental effect on, existing drainage patterns and soil stability in the locality,</p> <p>(b) the effect of the proposed development on the likely future use or redevelopment of the land,</p> <p>(c) the quality of the fill or the soil to be excavated, or both,</p> <p>(d) the effect of the proposed development on the existing and likely amenity of adjoining properties,</p> <p>(e) the source of any fill material and the destination of any excavated material,</p> <p>(f) the likelihood of disturbing relics,</p>	<p>The proposal involves delivery of an upper-level and modest ground works to create a lower ground level.</p> <p>The extend of land modification works is minor and subsurface drainage will ensure hydrological processes are not detrimentally impacted.</p> <p>Proposed land modification works will optimise the future use of the land and will not preclude or impinge on redevelopment potential.</p> <p>Any excavated material will be reused on site where possible or disposed of at a licenced waste management facility. A standard condition of consent concerning disposal of excavated material is anticipated.</p> <p>Sediment and erosion controls will be installed</p>	Yes

Clause	Standard	Comment	Compliance
	(g) the proximity to and potential for adverse impacts on any watercourse, drinking water catchment or environmentally sensitive area.	prior to site works commencing to prevent migration of sediment laden water from the site and mitigate impact on receiving waters.	
6.4 Development on sloping land	<p>(2) This clause applies to land shown as Area A, Area B, Area C, Area D and Area E on the Landslip Risk Map.</p> <p>(3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that—</p> <p>(a) the application for development has been assessed for the risk associated with landslides in relation to both property and life, and</p> <p>(b) the development will not cause significant detrimental impacts because of stormwater discharge from the development site, and</p> <p>(c) the development will not impact on or affect the existing subsurface flow conditions.</p>	<p>The site is identified as Area B on the <i>Landslip Risk Map</i>.</p> <p>A Geotechnical Investigation Report is supplied at Appendix D.</p> <p>The report describes subsurface conditions and identifies geotechnical hazards associated with site conditions and the proposed works.</p> <p>A risk analysis indicates that geotechnical hazards are “acceptable” provided recommendations contained in the report are implemented.</p> <p>The report indicates that the water table is expected to be many metres below the base of the proposed excavation.</p> <p>The consent authority can be satisfied that geotechnical risks can be managed and that land modification works will have no adverse impact on subsurface hydrology.</p>	Yes

4.2. PROPOSED INSTRUMENTS

There are no proposed planning instruments that are relevant to the site or the proposed development.

4.3. DEVELOPMENT CONTROL PLANS

4.3.1. Warringah Development Control Plan 2011

Warringah Development Control Plan 2011 (WDCP) applies to the site.

The proposal is broadly consistent with relevant development controls contained within WDCP except for a justifiable departure to the wall height and side boundary envelope control. A detailed discussion setting out the planning merits of this departure is outlined at Part 5.

A compliance summary is provided at Table 3.

Table 2 | WDCP compliance summary

Clause	Control	Comment	Compliance
Part B Built form controls			
B1 Wall heights	1. Walls are not to exceed 7.2 metres from ground level (existing) to the underside of the ceiling on the uppermost floor of the building (excluding habitable areas wholly located within a roof space).	<p>The south-west corner of the addition will breach wall height. The <u>maximum</u> extent of the breach is ~420mm.</p> <p>The 7.2m wall height plane is shown on elevations included with the architectural plans. The extent of the breach is identified in green.</p> <p>A justification is provided at Part 5.1.1.</p>	On merit
B2 Number of storeys	1. Buildings on land shown coloured on the DCP Map Number of Storeys must comply with the maximum number of storeys identified on the DCP Map Number of Storeys.	The site is not identified on the <i>Number of Storeys Map</i> .	n/a
B3 Side boundary envelope	1. Buildings on land shown coloured on the DCP Map Side Boundary Envelopes must be sited within a building envelope determined by projecting planes at 45 degrees from a height above ground level (existing) at the side boundaries of 4 metres.	<p>The site is shown on the <i>Side Boundary Envelope Map</i>.</p> <p>The proposed addition projects above the side envelope plane.</p> <p>The building envelope plane and areas of encroachment are identified on the architectural plans.</p> <p>The encroachment occurs due to site topography and existing finished floor levels which are to be retained.</p> <p>A justification is provided at Part 5.1.2.</p>	On merit

Clause	Control	Comment	Compliance
B4 Site coverage	1. Development on land shown coloured on the DCP Map Site Coverage shall not exceed the maximum site coverage shown on the map.	The site is not identified on the <i>Site Coverage Map</i> .	n/a
B5 Side boundary setbacks	1. Development on land shown coloured on the DCP Map Side Boundary Setbacks is to maintain a minimum setback from side boundaries as shown on the map.	The <i>Side Boundary Setback Map</i> indicates 0.9m setback from side boundaries is required. A side setback >0.9m is provided to the external elevations of the building.	Yes
	2. Side boundary setback areas are to be landscaped and free of any above or below ground structures, car parking or site facilities other than driveways and fences.	No adjustment to existing side setback conditions proposed.	n/a
B7 Front boundary setback	1. Development is to maintain a minimum setback to road frontages.	The <i>Front Boundary Setback Map</i> indicates a 6.5m setback from the front boundary is required. The existing building is ~12.8m from the front boundary. The ground level floorplate will extend eastward and will be setback a <u>minimum</u> of 8.3m from the front boundary.	Yes
	2. The front boundary setback area is to be landscaped and generally free of any structures, basements, carparking or site facilities other than driveways, letter boxes, garbage storage areas and fences.	The is an existing garage within the front setback which will be retained. No new structures are proposed in the front setback area.	On merit
	3. Where primary and secondary setbacks are specified, buildings and structures (such as carparks) are not to occupy more than 50% of the area between the primary and secondary setbacks. The	The front setback area is used for landscaping and paved pedestrian access. The existing garage occupies <50% of the front setback area.	Yes

Clause	Control	Comment	Compliance
	area between the primary setback and the road boundary is only to be used for landscaping and driveways.		
B9 Rear boundary setback	1. Development is to maintain a minimum setback to rear boundaries.	<p>The <i>Rear Boundary Setback Map</i> indicates a rear setback of 6m.</p> <p>The proposed development is > 6m from the rear property boundary.</p> <p>An existing swimming pool occurs in the rear setback area and is to be retained. Additionally, a modest paved outdoor dining area is proposed within rear setback.</p> <p>The controls permit these encroachments in the rear setback provided they do not occupy >50% of the area.</p> <p>Cumulatively, the swimming pool and paved outdoor dining area will occupy <50% of the rear setback area.</p>	Yes
	2. The rear setback area is to be landscaped and free of any above or below ground structures.	<p>The controls permit swimming pools and paved area in the rear setback provided they do not occupy >50% of the area.</p> <p>Cumulatively, the swimming pool and paved outdoor dining area will occupy <50% of the rear setback area.</p> <p>The rear setback area is otherwise landscaped.</p>	Yes
Part C Siting Factors			
C2 Traffic, access and safety	2. Vehicle access is to be obtained from minor streets and lanes where available and practical.	<p>Existing vehicular access is from Coolalie Place and will be maintained.</p> <p>There are no alternatives available.</p>	Yes
C3 Parking facilities	1. The following design principles shall be met:	The existing detached garage is to be retained.	Yes

Clause	Control	Comment	Compliance
	<ul style="list-style-type: none"> Garage doors and carports are to be integrated into the house design and to not dominate the façade. Parking is to be located within buildings or on site. Parking is to be located so that views of the street from front windows are not obscured; and Where garages and carports face the street, ensure that the garage or carport opening does not exceed 6 metres or 50% of the building width, whichever is the lesser. 	The garage door opening is <6m.	
	<p>4. Carparking is to be provided in accordance with Appendix 1 which details the rate of car parking for various land uses.</p> <p>Dwelling house = 2 spaces</p>	The existing detached double-bay garage is to be retained.	Yes
C4 Stormwater	Stormwater runoff must not cause downstream flooding and must have minimal environmental impact on any receiving stormwater infrastructure, watercourse, stream, lagoon, lake and waterway or the like.	Stormwater runoff will be discharged to Coolalie Place as is presently the arrangement.	Yes
	The stormwater drainage systems for all developments are to be designed, installed and maintained in accordance with Council's Water Management for Development Policy.	Stormwater runoff will be discharged to Coolalie Place in line with the requirements of the Council's Water Management for Development Policy. A standard condition of consent is anticipated.	Yes
C7 Excavation and landfill	1. All landfill must be clean and not contain any materials that are contaminated and must comply with the relevant legislation.	No fill will be imported to the site.	n/a

Clause	Control	Comment	Compliance
	2. Excavation and landfill works must not result in any adverse impact on adjoining land.	<p>A Geotechnical Investigation Report is supplied at Appendix D.</p> <p>The report finds that geotechnical hazards associated with proposed excavation works can be managed provided recommendations set out in the report are implemented.</p> <p>Recommendations relate to excavation methodology, retaining wall and slab construction, and underpinning (if required).</p>	Yes
	3. Excavated and landfill areas shall be constructed to ensure the geological stability of the work.	<p>Land modification is modest and generally limited to the area of excavation required for the paved outdoor dining area and the lower ground floor.</p> <p>Engineered retaining structures will be delivered and underpinning works will occur to ensure land stability.</p> <p>A standard condition of consent is anticipated.</p>	Yes
	4. Excavation and landfill shall not create siltation or pollution of waterways and drainage lines, or degrade or destroy the natural environment.	<p>Sediment and erosion controls will be installed prior to site works commencing to prevent migration of sediment laden water from the site and mitigate impact on receiving waters.</p>	Yes
	5. Rehabilitation and revegetation techniques shall be applied to the fill.	<p>Disturbed areas will be revegetated as set out in the landscape concept supplied with the architectural plans.</p>	Yes
	6. Where landfill is necessary, it is to be minimal and shall have no adverse effect on the visual and natural environment or adjoining	<p>No fill is proposed.</p>	n/a

Clause	Control	Comment	Compliance
	and surrounding properties.		
C8. Demolition and construction	1. All development that is, or includes, demolition and/or construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must be accompanied by a Waste Management Plan.	A waste management plan is supplied with the development application.	Yes
C9 Waste management	All development that is, or includes, demolition and/or construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must be accompanied by a Waste Management Plan.	A waste management plan is supplied with the development application.	Yes
Part D Design			
D1 Landscaped open space and bushland setting	1. The required minimum area of landscaped open space is shown on DCP <i>Landscaped Open Space and Bushland Setting Map</i> .	<p>The Landscaped Open Space and Bushland Setting Map indicates a that 40% of the site is to be provided as landscaped area.</p> <p>247sqm of landscaped area is proposed which equates to 43% of the site area and complies with the control.</p> <p>The landscaped area calculation excludes paved footpath areas and pervious areas with a minimum dimension of <2m.</p>	Yes
D2 Private open space	1. Residential development is to include private open space for each dwelling.	<p>Sufficient private open space areas are provided for the dwelling.</p> <p>The existing private open space area will be enhanced with the introduction of an outdoor dining and BBQ area.</p>	Yes

Clause	Control	Comment	Compliance
	2. The minimum area and dimensions of private open space are as follows: Dwelling houses with 3 or more bedrooms = A total of 60m2 with minimum dimensions of 5 metres	A private open space area of > 60sqm is provided in the rear yard. The private open space area satisfies the minimum dimension requirements.	Yes
	3. Private open space is to be directly accessible from a living area of a dwelling and be capable of serving as an extension of the dwelling for relaxation, dining, entertainment, recreation and children's play.	Private open space is directly accessible from the living area.	Yes
	4. Private open space is to be located and designed to ensure privacy of the occupants of adjacent buildings and occupants of the proposed development.	The private open space is situated in the rear yard and boundary fencing will ensure privacy.	Yes
	5. Private open space shall not be located in the primary front building setback.	The private open space is situated in the rear setback area.	Yes
	6. Private open space is to be located to maximise solar access.	The private open space area has north-western aspect and will receive sufficient sunlight.	Yes
D3 Noise	1. Noise from combined operation of all mechanical plant and equipment must not generate noise levels that exceed the ambient background noise by more than 5dB(A) when measured in accordance with the NSW Industrial Noise Policy at the receiving boundary of residential and other noise sensitive land uses.	Acoustic impact is not anticipated to be an issue in this scenario.	-
	4. Where possible, locate noise sensitive rooms such as bedrooms and private open space away from noise sources. For	The proposed internal arrangement of rooms ensures limited noise	Yes

Clause	Control	Comment	Compliance
	example, locate kitchens or service areas closer to busy road frontages and bedrooms away from road frontages.	transmission between spaces.	
	5. Where possible, locate noise sources away from the bedroom areas of adjoining dwellings/properties to minimise impact.	Living rooms are located on the western side of the dwelling.	Yes
D6 Access to sunlight	1. Development should avoid unreasonable overshadowing any public open space.	The proposal will not cast shadow over public open space.	Yes
	2. At least 50% of the required area of private open space of each dwelling and at least 50% of the required area of private open space of adjoining dwellings are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21.	<p><u>Site</u></p> <p>The private open space area has north-western aspect and will receive ample direct sunlight throughout the day.</p> <p><u>Neighbours</u></p> <p>Shadow diagrams have been prepared at hourly intervals between 9am and 3pm on the winter solstice to demonstrate shadow impact on neighbouring properties.</p> <p>The diagrams demonstrate that <u>nominal</u> additional shadow is cast over the private open space of the dwelling at 5 Coolalie Place between 9am and 10am.</p> <p>Nonetheless, the private open space will continue to receive >3hours of direct sunlight on the winter solstice.</p>	Yes
D7 Views	1. Development shall provide for the reasonable sharing of views.	The proposal provides for reasonable sharing of views.	Yes
D8 Privacy	1. Building layout should be designed to optimise privacy for occupants of the development and	The building layout is designed to preserve privacy for occupants of the development and neighbouring dwellings.	Yes

Clause	Control	Comment	Compliance
	occupants of adjoining properties.		
	2. Orientate living areas, habitable rooms and windows to private open space areas or to the street to limit overlooking.	Living room spaces are oriented to the street and to the rear yard thereby mitigating cross-viewing between properties. The upper level living space has no window openings on side elevations.	Yes
	3. The effective location of doors, windows and balconies to avoid overlooking is preferred to the use of screening devices, high sills or obscured glass.	New openings associated with high-use areas are generally oriented to the front or rear yard areas of the property. New window openings on side elevations are either associated with low-use spaces (i.e. bedrooms) or have been offset from windows on opposing elevations of neighbouring properties. Window arrangement preserves neighbour privacy.	Yes
	4. The windows of one dwelling are to be located so they do not provide direct or close views (i.e. from less than 9 metres away) into the windows of other dwellings.	New windows openings are positioned to avoid direct line of sight to neighbouring windows.	Yes
D9 Building bulk	1. Side and rear setbacks are to be progressively increased as wall height increases.	Proposed side and rear setbacks are greater than the minimum required by the minimum setback controls.	Yes
	2. Large areas of continuous wall planes are to be avoided by varying building setbacks and using appropriate techniques to provide visual relief.	The development has a maximum unarticulated width of 14.3m (ground level northern elevation). Window openings and a combination of external materials serve to moderate apparent	Yes

Clause	Control	Comment	Compliance
		building scale and articulate elevations.	
	<p>3. On sloping land, the height and bulk of development (particularly on the downhill side) is to be minimised, and the need for cut and fill reduced by designs which minimise the building footprint and allow the building mass to step down the slope. In particular:</p> <ul style="list-style-type: none"> • The amount of fill is not to exceed one metre in depth. • Fill is not to spread beyond the footprint of the building. • Excavation of the landform is to be minimised 	<p>The proposal seeks to utilise the exiting ground level floorplate thereby reducing additional land modification works.</p> <p>There is modest excavation proposed within the building footprint to facilitate the delivery of a lower ground level.</p> <p>No fill is proposed.</p>	Yes
	4. Building height and scale needs to relate to topography and site conditions.	<p>The proposed alterations and additions will result in a modestly scaled building, albeit involving projections above the side boundary envelope plane.</p> <p>These projections are driven by existing ground floor levels which are maintained, and site topography.</p> <p>A discussion setting out the merits of the building envelope departure is provided at Section 5.1.2.</p>	Yes
	5. Orientate development to address the street.	The proposed development addresses the street frontage.	Yes
	6. Use colour, materials and surface treatment to reduce building bulk.	A combination of external materials is proposed to ameliorate apparent building volume and achieve a visually appealing building product.	Yes

Clause	Control	Comment	Compliance
	7. Landscape plantings are to be provided to reduce the visual bulk of new building and works.	Landscaping is proposed and will function to ameliorate apparent building volume. Landscape arrangement and species selection is described in the landscape concept supplied with the architectural plans.	Yes
	8. Articulate walls to reduce building mass.	Proposed elevations are modestly scaled in terms of elevation width. Window openings articulate elevations to ameliorate apparent building volume. Materiality also contributes to articulation of building elevations.	Yes
D10 Building colours and materials	1. In highly visible areas, the visual impact of new development (including any structures required to retain land) is to be minimized through the use of appropriate colours and materials and landscaping.	Light coloured render and grey-toned bagged masonry is proposed to the external walls of the building. Materials are compatible with external materials present in the locality and moderate apparent building volume. The development will make a positive visual contribution to streetscape appearance.	Yes
	3. The colours and materials used for alterations and additions to an existing structure shall complement the existing external building façade.	The entire building will be rendered and existing face brick “bagged” for a consistent appearance.	Yes
D11 Roofs	2. Roofs should complement the roof pitch and forms of the existing buildings in the streetscape.	A pitched roof is proposed and complements roof forms in the locality.	Yes
	4. Roofs shall incorporate eaves for shading.	Eaves for shading are incorporated.	Yes

Clause	Control	Comment	Compliance
	5. Roofing materials should not cause excessive glare and reflection.	The proposed Colourbond roof sheeting is commonplace in the locality, is a neutral colour and will not cause excessive glare.	Yes
D12 Glare and reflection	<p>1. The overspill from artificial illumination or sun reflection is to be minimised by utilising one or more of the following:</p> <ul style="list-style-type: none"> • Selecting an appropriate lighting height that is practical and responds to the building and its neighbours; • Minimising the lit area of signage; • Locating the light source away from adjoining properties or boundaries; and • Directing light spill within the site. 	External lighting design and location is yet to be determined, however will be directed or baffled to avoid light spill.	Yes
	<p>2. Any glare from artificial illumination is to be minimised by utilising one or more of the following:</p> <ul style="list-style-type: none"> • Indirect lighting; • Controlling the level of illumination; and • Directing the light source away from view lines. 	External lighting design and location is yet to be determined, however will be directed or baffled to avoid light spill.	Yes
	<p>3. Sunlight reflectivity that may impact on surrounding properties is to be minimised by utilising one or more of the following:</p> <ul style="list-style-type: none"> • Selecting materials for roofing, wall claddings and glazing that have less reflection eg medium to dark roof tones; 	<p>Reflection off glazed surfaces is not anticipated to be an issue.</p> <p>North-facing openings are limited and will be partly protected eaves thereby mitigating reflection.</p> <p>The lighter coloured external materials has potential for sunlight reflectivity, however we submit that lighter external colours are compatible</p>	Yes

Clause	Control	Comment	Compliance
	<ul style="list-style-type: none"> • Orienting reflective materials away from properties that may be impacted; • Recessing glass into the façade; • Utilising shading devices; • Limiting the use of glazing on walls and glazed balustrades and avoiding the use of highly reflective glass; and • Selecting windows and openings that have a vertical emphasis and are significantly less in proportion to solid massing in walls. 	<p>with the local aesthetic and reduces heat load on the building.</p> <p>Moreover, owners can modify external cladding as exempt development, and it is beyond council's mandate to regulate colour.</p>	
D14 Site facilities	1. Site facilities including garbage and recycling enclosures, mail boxes and clothes drying facilities are to be adequate and convenient for users and services and are to have minimal visual impact from public places.	Site facilities are conveniently located and are discretely positioned to avoid adverse visual impacts.	Yes
D20 Safety and security	1. Buildings are to overlook streets as well as public and communal places to allow casual surveillance.	The dining space and upper-level windows will overlook the street for passive surveillance.	Yes
	2. Service areas and access ways are to be either secured or designed to allow casual surveillance.	There are no service areas proposed. This is an application for a domestic residence.	Yes
	3. There is to be adequate lighting of entrances and pedestrian areas.	Noted.	Yes
	5. Entrances to buildings are to be from public streets wherever possible.	The principal entry is evident from the street.	Yes
D22 Conservation of energy and water	1. The orientation, layout and landscaping of sites is to make the best use of natural ventilation, daylight and solar energy.	The building design and internal room configuration leverages site orientation and allows	Yes

Clause	Control	Comment	Compliance
		for superior solar entry and cross ventilation. Dwelling design will reduce reliance on artificial light sources.	
	2. Site layout and structures are to allow for reasonable solar access for the purposes of water heating and electricity generation and maintain reasonable solar access to adjoining properties.	The building design and internal room configuration leverages site orientation and allows for superior solar entry and cross ventilation.	Yes
	3. Buildings are to be designed to minimize energy and water consumption.	A BASIX certificate is supplied with this development application and sets out energy commitments.	Yes
	4. Landscape design is to assist in the conservation of energy and water.	Species selection is understood to incorporate endemic species suitable for this climate. A landscape concept is supplied with the architectural plans.	Yes
	5. Reuse of stormwater for on-site irrigation and domestic use is to be encouraged, subject to consideration of public health risks.	A BASIX certificate is supplied with this development application and sets out energy commitments, including rainwater harvesting and reuse.	Yes

Part E The natural environment

E10 Landslip risk	For land identified as being in Area A: Council may decide that a preliminary assessment of site conditions is required. If Council so decides, a preliminary assessment of site conditions must be prepared, in accordance with the Checklist for Council's assessment of site conditions by a suitably qualified geotechnical engineer/ engineering geologist. The preliminary assessment	The site is identified as Area B on the <i>Landslip Risk Map</i> . A Geotechnical Investigation Report is supplied at Appendix D .	Yes
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Clause	Control	Comment	Compliance
	must be submitted to Council before the granting of any development consent.		

4.4. PLANNING AGREEMENTS

There are no planning agreements associated with this site.

4.5. THE REGULATIONS

Section 92 of the *Environmental Planning and Assessment Regulation 2000* prescribes additional matters that the consent authority must consider in determining a development application. Each matter for consideration and its relevance to the proposal is noted in Table 3.

Table 3 | Additional matters for consideration (Regs)

Clause	Matter	Relevance
92(1)(b)	In the case of a development application for the demolition of a building, the provisions of <i>AS 2601 The demolition of structures</i> .	Demolition works will be carried out as per the provisions of AS 2601.
92(1)(c)	In the case of a development application for development on land subject to a subdivision order, the provisions of that subdivision order.	The site is not subject to a subdivision order.
92(1)(d)	In the case of certain development on land within 200km of Siding Spring Observatory, the <i>Dark Sky Planning Guideline</i> .	The site is not within 200km of the Siding Spring Observatory.
92(1)(e)	In the case of a development application for a manor house or multi dwelling housing (terraces), the <i>Medium Density Design Guide for Development Applications</i> .	The development application does not propose a manor house or multi dwelling housing (terraces).
92(1)(f)	In the case of a development application for residential development within the Penrith City Centre, the <i>Development Assessment Guideline: An Adaptive Response to Flood Risk Management for Residential Development in Penrith City Centre</i> .	The site is not within the Penrith City Centre.

5. PLANNING ASSESSMENT

This section provides a planning assessment of the likely impacts of the proposed development, considers the suitability of the site and evaluates whether the development is in the public interest, as required by section 4.15(1) of the *Environmental Planning and Assessment Act 1979*.

5.1. IMPACTS ON THE NATURAL AND BUILT ENVIRONMENT

The proposed alterations and additions are sited and designed to optimise occupant amenity and to mitigate adverse impact on neighbour amenity. The development will result in positive built environment outcomes and will have no adverse impact on the natural environment.

Below we outline aspects of the proposal that relate to built environment considerations.

5.1.1. Wall height

Part B1 of WDCP contains a wall height control and states that external walls are not to exceed 7.2m measured from existing ground level to the underside of the ceiling of the uppermost level.

The objectives of the control are to minimise the visual impact of development, to ensure development is generally beneath the tree canopy and responds to site topography, to allow reasonable sharing of views, and to minimise the impact of development on adjoining property.

The south-east portion of the proposed upper level has a maximum wall height of ~7.62m. The portion of the building extending above the permitted 7.2m wall height is identified in green on the southern and eastern elevations included with the architectural plans (refer sheets D401 and D402).

Despite non-compliance, the proposal is acceptable because:

- The extent of variation is minor at ~420mm which equates to a percentage variation of 5.8%. The non-compliance is limited to the south-eastern portion of the upper level. While the marginal extent of variation is not in and of itself adequate justification, it is relevant to council's consideration of the non-compliance.
- The proposal retains the ground floor which is elevated above ground level (existing) by ~2.3m. This response to existing built form contributes to the wall height breach. The dwelling could conceivably be demolished, and a compliant built form erected in its place. To do so would be to waste embodied energy. The proposed approach aligns with sustainability principles.
- The wall height control anticipates a conventional site with even grade. The site has a moderate fall from the rear to Coolalie Place. Topographical conditions

contribute to the envelope breach. It is appropriate to consider a variation given site conditions.

- The site slope at the base of the southern elevation is ~20%. The “exceptions” component of Part B1 indicates that the wall height control may be varied on slopes greater than 20% provided the wall height does not breach the 8.5m height of building standard and the proposal has minimal visual impact. The building does not breach the 8.5m height plane and we submit that, due to increased front setback and mature verge plantings, the building has minimal visual impact despite wall height breach.
- The portion of the building that projects above the side boundary envelope will have no adverse overshadow impact. Shadow diagrams supplied with the architectural plans demonstrate that the shadow cast by the non-compliant component of the building will have no impact on the private open space areas of adjoining development.
- The wall height breach will have no impact on view corridors through the site from private property or public land.
- Increased side and front building setbacks and established verge planting will moderate the apparent scale of the building when viewed from Coolalie Place and neighbouring properties. The addition will not project above the tree canopy situated within the substantial bushland reserve to the rear (Manly Dam).
- The building design has sought to reduce wall height by proposing modest internal clearances at ground (2.7m) and first floor (2.5m). The wall height breach cannot be attributed to opulent or excessive internal clearances or building design.

The wall height non-compliance relates to site topography and a desire to preserve existing building fabric. The scale of the development is compatible with dwellings in the streetscape and will have no adverse impact on neighbour amenity. The discussion set out above demonstrates that the proposal satisfies the objectives of the side boundary envelope control.

5.1.2. Building envelope

Part B3 of WDCP sets out a side boundary envelope control and requires that development be contained within a plane projected at 45 degrees at a height of 4m above the side boundary.

The objectives of this control are to ensure development does not become visually dominant by virtue of its height and bulk; to ensure adequate light, solar access, and privacy by providing visual separation between buildings; and to ensure development responds to site topography.

The development will project above the side boundary envelope as illustrated in the envelope plane diagram at Figure 4.

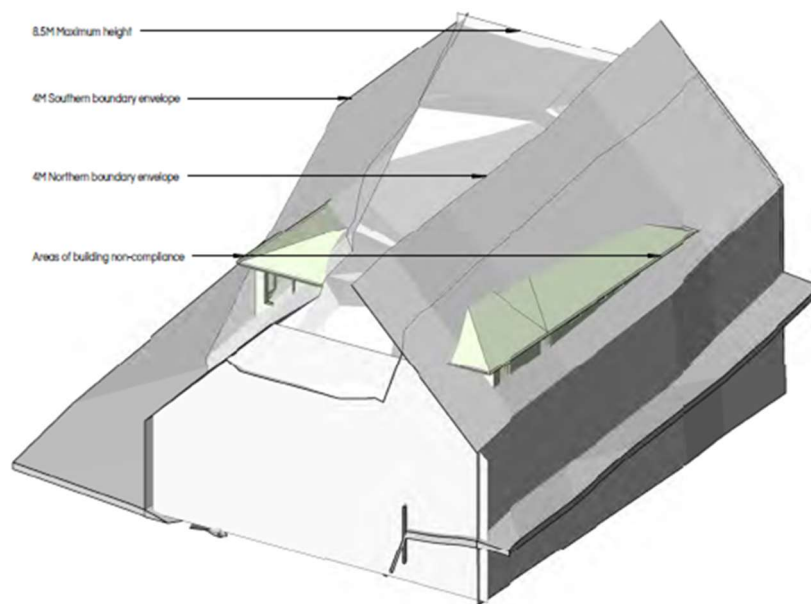


Figure 4 | Envelope plane incursion (Source: Three Letters)

Despite non-compliance, the proposal is acceptable because:

- The envelope control anticipates a conventional site with even grade. The site has a moderate fall from the rear to Coolalie Place. Topographical conditions contribute to the envelope breach. It is appropriate to consider a variation given site conditions.
- The proposal involves retaining the ground floor level which is elevated above natural ground. This response to existing built form contributes to the envelope breach. It is conceivable that the dwelling could be demolished and a compliant built form erected in its place though to do so would be to waste embodied energy. The proposed approach aligns with sustainability principles.
- Planning controls require a side setback of 900mm. A uniform 995mm side setback is proposed from the northern side boundary and a variable setback ranging from 1.6–5m is proposed from the southern side boundary. The increased setback allows for increased solar access and building separation and mitigates apparent building scale.
- The portion of the building that projects above the side boundary envelope will have no adverse overshadow impact. Shadow diagrams supplied with the architectural plans demonstrate that the shadow cast by the non-compliant component of the building will not fall over private open space areas of adjoining development.
- Window openings on the non-compliant portion of the southern and northern elevations are associated with low-use spaces (i.e. bedrooms). Windows are positioned such that they are offset from windows openings on opposing elevations of adjoining dwellings. The envelope breach will have no adverse impact on neighbour privacy.
- The depth of the southern and northern elevations is ~11.8m and ~13.3m, respectfully. The building depth of adjoining dwellings at 5 and 6 Coolalie Place is ~21.5m and ~15.7m, respectfully. The horizontal scale (i.e. building depth) of

the northern and southern elevations is less than the horizontal scale of neighbouring dwellings. The shallow building depth mitigates the vertical scale of the “offending” elevations.

The envelope non-compliance is a product of site topography and a desire to preserve existing building fabric. The scale of the development is compatible with dwellings in the streetscape and will have no adverse impact on neighbour amenity. The discussion set out above demonstrates that the proposal satisfies the objectives of the side boundary envelope control.

5.1.3. Bushfire

The site is designated as “bushfire prone land” on the council’s *Bushfire Prone Land Map*. A Bushfire Risk Assessment Report has been prepared and is supplied at **Annexure C**.

The Report determines the bushfire attack level based on prevailing slope and type of vegetation and sets out recommendations that are to be implemented to satisfy the performance standards contained in *Planning for Bushfire Protection 2019*.

The Report explains that areas within the property beyond the building footprint are to be maintained as an Asset Protection Zone (APZ) to achieve the nominated bushfire attack level (BAL) ratings and allow for a defensible space. The Report recognises that no vegetation modification is required to implement the APZ.

The Report recommends that all new roofing and east, north, and south-facing elevations be constructed to comply with section 8 (BAL 40) of AS3959:2018 and the eastern elevation be constructed to comply with section 7 (BAL 29) of AS3959:2018.

We conclude that the proposed alterations and additions respond appropriately to bushfire affectation and the site is suitable for ongoing residential land use despite environmental hazards.

5.2. SOCIAL IMPACTS

The proposal will have a positive social impact from the perspective of dwelling occupants who will enjoy high-amenity spaces conducive to contemporary living. Short term disturbance associated with demolition and construction works is possible however mitigation measures such as prescribed hours of work will minimise impact.

Social impacts are primarily positive and adverse social impacts can be mitigated and are short term.

5.3. ECONOMIC IMPACTS

The proposal will have short term economic impact through job creation associated with proposed demolition and construction works. The proposed development will improve housing stock in Beacon Hill and there will be resultant uplift in property value.

Economic impacts associated with the proposal are positive.

5.4. SITE SUITABILITY

The site presently accommodates a residential land use which is permitted within Zone R2 and compatible with surrounding land use. The development involves alterations and additions to existing housing stock in a manner encouraged by applicable zone objectives.

The development is designed to integrate with streetscape character and preserve the amenity of neighbouring dwellings, despite wall height and side envelope departures. The site does not present any constraints that would preclude reasonable development of the land for residential purposes.

The site is suitable for the proposed development.

5.5. PUBLIC INTEREST

The development will improve housing stock in a manner encouraged by the applicable zone objectives. The development has been designed to respond to site conditions, minimise impacts on neighbours and integrate with the streetscape.

The proposal aligns with the public interest.

6. CONCLUSION

This Statement of Environmental Effects has been prepared to support an application for alterations and additions to dwelling at 6 Coolalie Place, Allambie Heights.

The objective of the development proposal is to deliver a contemporary dwelling in a manner encouraged by the zone objectives and planning controls. The alterations and additions will enhance the functionality of the dwelling and preserve the amenity of neighbours.

Our report describes the key aspects of the proposal which include a modest expansion of the ground level floor plate and construction of a new upper and lower ground level. An enhanced outdoor dining and BBQ area and associated landscape works are proposed.

Our evaluation of the proposal against the relevant planning instruments has found that the proposal is broadly consistent with instrument objectives, development standards, provisions, and controls, except for a justifiable variation to wall height and side envelope controls.

We have assessed the environmental impacts of the proposal and have determined that there are no apparent adverse impacts. We have assessed building scale, siting and arrangement and neighbour amenity and consider that development outcomes are site responsive, and no design modification is warranted.

Our report explains that the site is suitable for the development as it is zoned for residential purposes and is compatible with surrounding land use. We establish that the development is in the public interest given the absence of adverse impact and the resultant improvement to housing stock.

We conclude that the proposal is worthy of approval.



APPENDIX A | SURVEY



APPENDIX B | ARCHITECTURAL PLANS



APPENDIX C | BUSHFIRE RISK ASSESSMENT



APPENDIX D | GEOTECHNICAL REPORT



APPENDIX E | WASTE MANAGEMENT PLAN