



STATEMENT OF ENVIRONMENTAL EFFECTS

ALTERATIONS TO AN EXISTING DWELLING

32 ILUKA ROAD | PALM BEACH

PROJECT REF: 2174
DATE: 04 APRIL 2025

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1 EXECUTIVE SUMMARY

This Statement of Environmental Effects is to accompany a development application to Northern Beaches Council seeking consent to construct alterations and additions to an existing dwelling located at No. 32 Iluka Road, Palm Beach.

The proposal has been designed by Sam Crawford Architects and seeks to alter and adapt the existing dwelling house to improve internal amenity and the functionality of the dwelling whilst largely maintaining the external aesthetic of the dwelling when viewed from the street and waterway.

The proposal will not alter the overall height of the existing dwelling and will maintain the parking structures and studio building as it presents to the street. The proposed works will also maintain the established planting at the street frontage and will improve the legibility of the pedestrian access to dwelling.

The proposed works will maintain primary living areas at the ground floor level whilst modifying the entry arrangement, stair core and configuration of the primary and secondary living spaces. First floor works will extend over the modified ground floor level and include improved functionality to existing bedrooms and an additional bedroom (4 in total).

The proposal includes the provision of a covered external area over the existing south-west facing deck. The covered area extends within the foreshore area, however, maintains the footprint of the existing dwelling in accordance with the requirements of the LEP.

The design achieves a high level of compliance with the core LEP and DCP controls with only minor variations sought to the building envelope requirements based on maintaining the relationship of the existing dwelling to each side boundary. The proposal maintains an appropriate level of sunlight and a suitable scale and relationship to each adjoining dwelling.

The proposed works are demonstrated to be compatible with the Estuarine Planning Level advice and overland Flow Flood Risk category applying to the site. Submitted in support of this application are the following documentation:

1. Architectural Drawings – Prepared by Sam Crawford Architects;
2. Detail Survey – Prepared by CMS Surveyors Pty Ltd;
3. Waste Management Plan – Prepared by Sam Crawford Architects;
4. Stormwater Design – Prepared by Stellen Consulting; and
5. BASIX Certificate – Prepared by Sam Crawford Architects.

This Statement of Environmental Effects identifies the site, details the proposal and undertakes an assessment of the proposed development with consideration to the relevant planning framework and the likely impacts of the development on the natural and built environment in accordance with S.4.15 of the Environmental Planning & Assessment Act, 1979.

This Statement concludes that the proposal is appropriate and is endorsed for approval.

2 SUBJECT SITE AND ADJOINING DEVELOPMENT

The subject site is a waterfront lot, located on the south-western side of Iluka Road and extending to the foreshore of Pittwater (Sandy Beach) at the rear boundary. The site is identified as No. 32 Iluka Road, Palm Beach and has a legal description of Lot 37 in Deposited Plan 14682. Figure 1 below identifies the site location.



Figure 1: Site Location Plan

The site is regular in shape, with a site area by survey of 517.9m². The site contains a fall of approximately 930mm from the frontage (RL2.84) to the waterway (RL1.91).

Situated on the site is an existing two storey dwelling house that is oriented towards the waterway. The dwelling contains an existing basement level located under the footprint of the dwelling house and primary living areas are located at the ground level. The first floor level contains 3 x bedrooms.

A detached garage and studio building are constructed to the primary boundary and presents to the street frontage. The detached building and established vegetation largely obscure views of the dwelling house from the street frontage (Figure 2).



Figure 2: Existing detached garage and studio at the site, viewed from the street frontage

A covered pedestrian access extends from the street frontage to the dwelling house along the western boundary. The detached garage / studio, vegetation and pedestrian access to the dwelling are indicated at Figure 3, when viewed from the first floor of the dwelling looking north-east.



Figure 3: Detached garage and studios, landscaping and pedestrian access to the dwelling

The south-western façade of the dwelling as it presents to the waterway is indicated at Figure 4.



Figure 4: South-western elevation as the dwelling presents to the waterway

The aerial photograph at Figure 5 identifies the existing buildings at the site and the relationship to the surrounding residential properties.



Figure 5: Aerial photograph of the site and adjoining residential properties

To the north-west of the site is No. 34 Iluka Road. Situated on this property is a single level cottage of weatherboard construction. Primary living areas face south-west towards the waterway and a dividing fence and planting exists at the common boundary. Figure 6 identifies the rear portion of No. 34 looking and the relationship with the existing dwelling at the site.



Figure 6: Grassed yard and common boundary between the site and No. 34 Iluka Road

Adjoining the south-eastern boundary of the site is an existing two storey dwelling house located at No. 28-30 Iluka Road. This adjoining dwelling contains primary living areas that face towards the waterway and a central courtyard that exists between the dwelling house and detached garage that front the street. The existing dwelling when viewed from the street frontage is indicated at Figure 7.



Figure 7: No. 28-30 Iluka Road, viewed from the subject site

To the north of the site, on the opposite side of Iluka Road is Palm Beach Kindergarten. An open form fence and play area is visible from the street frontage and a heritage listed building is located at the northern portion of the site, towards the Barrenjoey Road frontage.

3 PROPOSED DEVELOPMENT

The proposal seeks consent to construct alterations and additions to the existing dwelling. The proposal is well described on the submitted architectural drawings prepared by Sam Crawford Architects and is described below.

3.1 Demolition

The proposal involves partial demolition of the existing dwelling as detailed on the demolition plans. Demolition within the basement is internal to the basement level and demolition at the ground and first floor levels largely relate to the northern portion of the existing dwelling. The proposal includes the demolition of the existing covered pedestrian way and primary entrance to the dwelling.

Demolition will be undertaken in accordance with AS2601-2001 by a licensed contractor.

3.2 Alterations and Additions to Existing Dwelling

The proposed alterations and additions to the existing dwelling are detailed below according to each level and the external treatments.

Basement Level

The proposed includes the refurbishment of an existing laundry and reconfiguration of the existing internal stair access to the existing basement level as detailed at Figure 8 below.

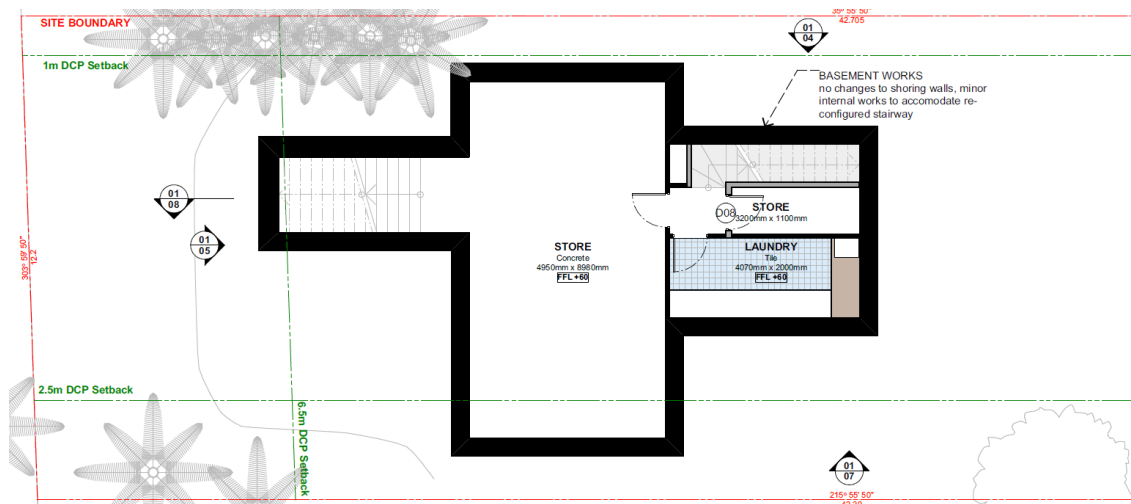


Figure 8: Proposed works within the existing basement level

Ground Floor Level

Works to the ground floor level are proposed to improve the pedestrian entry and accommodate stair access to the basement and first floor levels. The reconfigured ground floor level will contain a new kitchen that connects with the existing open plan living areas.

The existing TV Room will be extended, and a powder room will be provided at the ground floor level.

Ground floor works also include the provision of a covered awning and associated privacy screens above the existing timber deck, adjacent to the foreshore as well as a new north-east facing pergola.

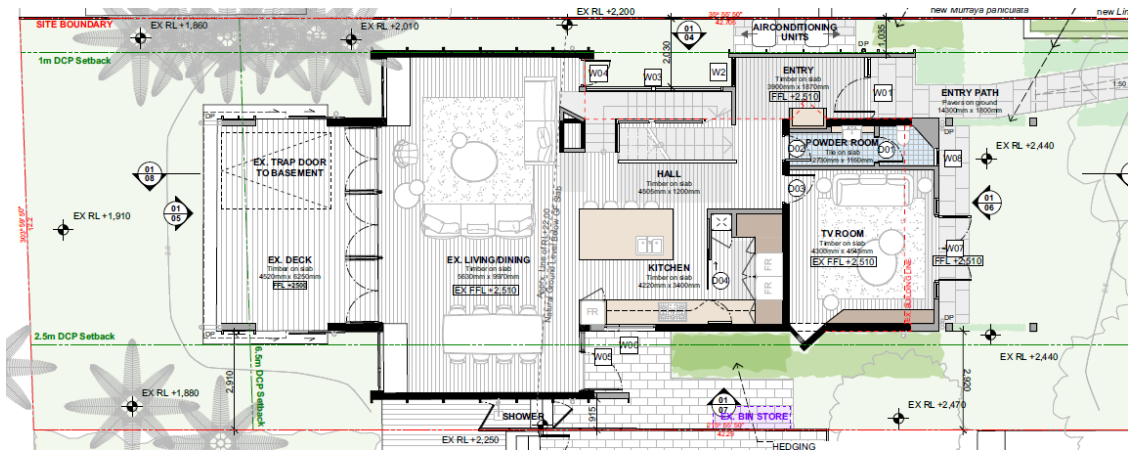


Figure 9: Proposed works to the ground floor level

First Floor Level

The first floor level will be extended above the modified ground floor footprint and will maintain the existing south-west facing bedrooms. The northern portion of the floor plan is to be modified to contain an additional 1 x bedroom, new bathrooms and a north facing terrace as indicated at Figure 10.

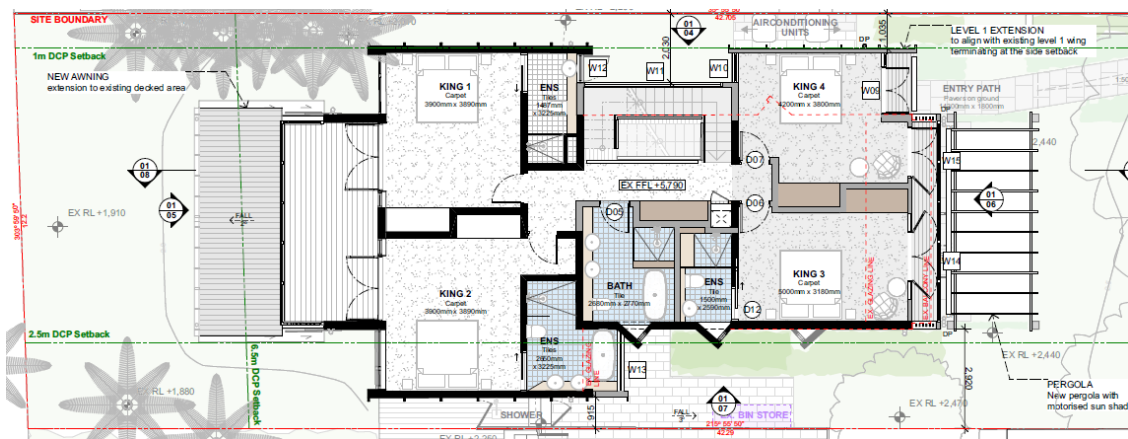


Figure 10: Proposed works to the first floor level

Externally

The proposed works are designed to maintain the external aesthetic of the existing dwelling. Due to the nature of the proposed works, there will be minimal discernable changes to the dwelling when viewed from the waterway. Works to the northern portion of the dwelling will maintain the existing aesthetic in terms of material treatments, window design and external detailing and will include a new covered pergola structure.

3.3 Estuarine Planning Levels / Flood Planning

Estuarine Planning Levels

The subject site is identified within the Estuarine Risk Management Policy as being subject to Sea Level Rise. Council was engaged during the design stage in this regard and advised that:

Estuarine Planning Level advice for 32 Iluka Road, Palm Beach follows:

In accordance with the Pittwater Estuary Mapping of Sea Level Rise Impacts Study (2015), a base Estuarine Planning Level (EPL) of 2.79m AHD (2050 sea level rise scenario) would apply at the site, 32 Iluka Road, Palm Beach.

A reduction factor (RF) based upon the distance from the foreshore of proposed development may also apply at a rate of 0.08m AHD reduction to the EPL for every 5.00m distance from the foreshore edge up to a maximum distance of 40.00m beyond which no further reduction is applicable. The local (still) water level (2050 sea level rise scenario) + 0.3m freeboard at this property is 2.2m AHD.

Having regard to the above all internal and external floor levels, and a majority of the curtilage of the subject dwelling will be located above the projected water level of 2050 taking into account the 0.3m freeboard. In addition, a majority of the proposed works will be located at parts of the site that will not be affected by the projected Estuarine Planning levels.

Flood Planning Levels

The western boundary of the site is identified as Low Flood Risk as it is only partially affected by the MPF level. The internal floor levels of the dwelling are located well above the MPF and therefore comply with the required flood planning levels for habitable spaces.

3.4 Landscaping

The proposal will maintain all existing trees at the site and on the adjoining properties. The landscaped areas identified on the architectural drawings are sufficient to accommodate additional plantings as identified. In addition to retaining all existing vegetation at the site, the proposal will increase the impervious landscaped area at the site and will allow for planting in areas that will facilitate screening between neighbouring properties. The proposed works will also improve the pedestrian access with a new 990mm wide pathway that will be surfaced in sandstone pavers.

3.5 Stormwater

The Hydraulic design is detailed on the accompanying Stormwater Plan prepared by Stelling Consulting. The proposal will rely on the capture of all roof water and surface water to be directed to a spreader system located within the south-western portion of the site. Surface water will therefore discharge to the waterway.

4 STATUTORY PLANNING ASSESSMENT

Provided below is a statutory planning assessment of the proposed development in accordance with the matters for consideration under Section 4.15 of the Environmental Planning & Assessment Act, 1979. This assessment considers the following:

- Relevant planning policies and controls - Section 4.15(1)(a);
- Impacts on the natural and built environment - Section 4.15(1)(b);
- The suitability of the site for the development - Section 4.15(1)(c); and
- The public interest - Section 4.15(1)(e).

4.1 Compliance with Planning Controls (Section 4.15(1)(a))

The following provides an assessment of the statutory and non-statutory planning policies that apply to the application under Section 4.15(1)(a) of the EP&A Act, 1979.

4.1.1 State Environmental Planning Policy (Resilience and Hazards) 2021

Provided below is a response to Chapters 2 and 4 as they relate to Coastal Management and Remediation of Land.

Chapter 2 – Coastal Management (Coastal Uses)

The subject site is identified as being within the Coastal Environment Map and Coastal Uses area under SEPP (Coastal Management) 2018 and as such the provisions of this Chapter apply.

Table 1 below provides an assessment of the relevant provisions that apply to Coast Uses areas under Division 4 of the SEPP.

Table 1: Coastal Uses Provisions – Division 4 SEPP (Resilience and Hazards) 2021		
Standard	Proposals	Compliance
2.11 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,	The proposal will not impact upon access to and along the foreshore.	Yes
(ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,	No impacts on views or wind tunnelling from a public area.	Yes
(iii) the visual amenity and scenic qualities of the coast, including coastal headlands,	The proposed alterations and additions to the existing dwelling will not materially change the scale or presentation of the existing dwelling when viewed from the waterway.	Yes
(iv) Aboriginal cultural heritage, practices and places,	No impacts on aboriginal, cultural or built environmental heritage given that the works are limited alterations and addition within the	Yes

Table 1: Coastal Uses Provisions – Division 4 SEPP (Resilience and Hazards) 2021		
Standard	Proposals	Compliance
(v) cultural and built environment heritage, and	curtilage of the existing dwelling. No impact on cultural or built environmental heritage.	Yes
(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	No material impacts arise from the proposal given the scale of the works proposed which mostly maintain the presentation and relationship of the existing dwelling to the foreshore and coastal area.	Yes
(ii) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or	N/A – no material adverse impacts proposed.	N/A
(iii) if that impact cannot be minimised—the development will be managed to mitigate that impact, and	N/A – no material adverse impacts proposed.	N/A
(c) has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development.	The site and context analysis identifies the existing built form character and relationship of the existing dwelling within the immediate context. The proposed works comply with the height, setback and built form provisions that apply to the site and therefore results in a suitable form that is reasonably expected at the site and foreshore context.	Yes

Table 2 below provides an assessment of the relevant provisions that apply to the Coastal Environment areas under Division 4 of the SEPP

TABLE 2: Coastal Environment Provisions – Division 4 SEPP (Resilience and Hazards) 2021		
Requirement	Proposal	Compliance
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,	No change to the footprint of levels of the dwelling as it addresses the waterway and no impacts on sensitive features of the Coastal Environment.	Yes
(b) coastal environmental values and natural coastal processes,	The proposal will have no impact on coastal values or natural coastal processes due to the location and scale of the works to the existing dwelling.	Yes

TABLE 2: Coastal Environment Provisions – Division 4 SEPP (Resilience and Hazards) 2021		
Requirement	Proposal	Compliance
(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,	As above, no impacts on sensitive elements of the marine environment.	Yes
(d) marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,	No impact on existing marine vegetation. Existing vegetation on the site will be maintained.	Yes
(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,	No public access exists or is proposed.	Yes
(f) Aboriginal cultural heritage, practices and places,	The site is already developed and the extent of works proposed will not impact on Aboriginal cultural heritage items or places.	Yes
(g) the use of the surf zone.	N/A – no impact on surf zone.	N/A
(2) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that:		
(a) the development is designed, sited and will be managed to avoid an adverse impact referred to in subclause (1), or	The development is largely taking place within previously disturbed areas of the site and as such, will have no impact on the existing natural or built environment.	Yes
(b) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or	As above.	Yes
(c) if that impact cannot be minimised—the development will be managed to mitigate that impact	As above	Yes
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,	No impact on public access and enjoyment of the foreshore area.	Yes

TABLE 2: Coastal Environment Provisions – Division 4 SEPP (Resilience and Hazards) 2021		
Requirement	Proposal	Compliance
including persons with a disability,		
(ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,	The proposal will not overshadow, create a window tunnel or result in loss of views to or from any public place.	Yes
(iii) the visual amenity and scenic qualities of the coast, including coastal headlands,	The proposed development is highly compliant with the range of LEP and DCP provisions that apply and will simply alter an existing dwelling without changing the fundamental visible scale and character of the dwelling within the coastal setting.	Yes
(iv) Aboriginal cultural heritage, practices and places,	No anticipated impacts.	Yes
(v) cultural and built environment heritage, and	No anticipated impacts.	Yes
(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	The development has been designed and sited to avoid adverse impact, as outlined above.	Yes
(ii) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or	As above.	Yes
(iii) if that impact cannot be minimised—the development will be managed to mitigate that impact, and	As above.	Yes
(c) has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development.	The proposed development is highly compliant with the range of LEP and DCP provisions that apply and is consistent with the character of development in the foreshore locality.	Yes

Accordingly, the proposal is appropriate when considered in light of the applicable provisions of Division 4 of SEPP (Resilience and Hazards) 2021.

Chapter 4 – Remediation of Contaminated Land

Chapter 4 of SEPP (Resilience and Hazards) 2021 applies to the State of NSW and aims to undertake remediation of contaminated land for the purpose of reducing risk of harm to human health or any other aspect of the environment.

Clause 4.6 stipulates that a consent authority must not consent to the carrying out of development on land unless it has considered whether land is contaminated. The alterations and additions relate to an existing dwelling and residential property that has a long standing and established use for residential purposes. In light of the historical use of the site and due to the scale of the proposed works, there is no reason to suspect that the site is contaminated or requires remediation. As such, the requirements of Chapter 4 of SEPP (Resilience and Hazards) 2021 are satisfied.

4.1.2 SEPP (Sustainable Buildings) 2022

The proposal is defined as BASIX affected development and under the SEPP a BASIX Certificate is required. A BASIX Certificate has been prepared and accompanies this application. The assessment demonstrates that the development once operational will comply with the thermal, water and energy requirements of the SEPP.

4.1.3 Pittwater Local Environmental Plan 2014

Under the LEP the subject site is located within the *C4 – Environmental Living* zone within which dwellings houses are permissible with consent from Council. The objectives of the E4 Zone are as follows:

- *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.*

The proposal includes alterations and additions to an existing dwelling that have been designed to maintain the low density character of the area and are compatible with the environmental features of the site. As such, the proposed alterations and additions are consistent with the objectives of the zone.

A review of relevant LEP maps indicates that the site is not identified as a heritage item, is not biodiversity sensitive, is not located within a coastal risk location and is not identified within a geotechnical risk area.

The site is however, affected by a foreshore building line, contains Class 3 acid sulfate soils and is located adjacent to a heritage listed dwelling house. Provided at Table 3 is a consideration of the development standards that are applicable to the site and the proposed development.

TABLE 3: RELEVANT PROVISIONS OF PITTWATER LEP 2014		
Provision	Proposal	Complies
2.7 Demolition The demolition of a building or work may be carried out only with development consent.	The proposal involves demolition of the existing dwelling and ancillary structures at the site which is permissible with consent from Council.	Yes
4.3 Building Height (2) Maximum height on maps is 8.5m	The proposed works and existing dwelling are located within the maximum 8.5m height limit.	Yes
4.6 Exception to Development Standards Provides exception to development standards subject to satisfaction of statutory tests.	Noted, however, compliance has been achieved with all applicable LEP development standards.	Yes
5.10(5) Heritage assessment The consent authority may, before		

TABLE 3: RELEVANT PROVISIONS OF PITTSWATER LEP 2014

[illegible]

TABLE 3: RELEVANT PROVISIONS OF PITTWATER LEP 2014

Provision	Proposal	Complies
(b) the intended design and scale of buildings resulting from the development, (c) whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood, (d) the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.	Suitable alterations and additions proposed that maintain the flood levels of the existing dwelling. N/A – minor flooding affecting the site and no measures required to ensure safe evacuation. N/A – the site is not impacted by Coastal erosion.	Yes N/A N/A
7.1 Acid Sulfate Soils The site is located within Class 3 Acid Sulfate Soils and a management plan is required if: <i>Works more than 1 metre below the natural ground surface.</i> <i>Works by which the watertable is likely to be lowered more than 1 metre below the natural ground surface.</i>	No works are proposed that will require more than 1m of excavation and the watertable will not be lowered, accordingly, no management plan is required.	Yes
7.2 Earthworks (3) In deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters— (a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development, (b) the effect of the development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both, (d) the effect of the development on the existing and likely amenity of adjoining properties, (e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to, and potential for	No works proposed that will impact on drainage patterns or soil stability. The proposal will not impact on the continued use of the site for residential purposes. There will be negligible excavated material, all of which will be reused on site. Minor ground works that will not impact on the amenity of the adjoining properties. All excavated material will be reused on site. N/A – No evidence to suggest that relics exist at the site or will be impacted by the works within the curtilage of the existing dwelling. Suitable construction management will	Yes Yes Yes Yes Yes

TABLE 3: RELEVANT PROVISIONS OF PITTWATER LEP 2014		
Provision	Proposal	Complies
adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area, (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development, (i) the proximity to and potential for adverse impacts on any heritage item, archaeological site or heritage conservation area.	ensure that siltation does not impact on the adjacent waterway. Typical construction management will mitigate any potential minor impacts. The proposal includes works in the curtilage of the existing dwelling, at parts of the site that have been disturbed from long standing residential use. The minor works will have no impact on existing sensitive archaeology.	Yes Yes
7.7 Geotechnical Hazards (3) Before determining a development application for development on land to which this clause applies, the consent authority must consider geotechnical risks.	No identified geotechnical hazards	Yes
7.8 Limited Development on Foreshore Area (2) Development consent must not be granted for development on land in the foreshore area except for the following purposes— (a) the extension, alteration or rebuilding of an existing building wholly or partly in the foreshore area, but only if the development will not result in the footprint of the building extending further into the foreshore area, (b) boatsheds, sea retaining walls, wharves, slipways, jetties, waterway access stairs, swimming pools, fences, cycleways, walking trails, picnic facilities or other recreation facilities (outdoors). (3) Development consent must not be granted under this clause unless the consent authority is satisfied that— (a) the development will contribute to	The existing dwelling extends forward of the applicable foreshore building line and the proposed works will result in alterations and additions to the existing dwelling that maintain the footprint of the existing dwelling as it projects into the foreshore area. Notably, the proposed works include the construction of an open awning that extends over the existing timber deck and access to the basement level. These additions are suitable alterations to the existing dwelling and do not project beyond the existing building footprint. N/A The alterations and additions to the	Yes N/A Yes

TABLE 3: RELEVANT PROVISIONS OF PITTWATER LEP 2014

Provision	Proposal	Complies
achieving the objectives for the zone in which the land is located, and	existing dwelling will maintain a suitable low density dwelling that complements the surrounding context and is compatible with the environmental features of the site.	
(b) the appearance of any proposed structure, from both the waterway and adjacent foreshore areas, will be compatible with the surrounding area, and	The modest awning structure will be incorporated into the aesthetic of the existing dwelling and is compatible with the context noting the small boatshed structure to the west of the site that projects forward of the awning.	Yes
(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	No impacts subject to appropriate construction management.	Yes
(d) the development will not cause congestion or generate conflict between people using open space areas or the waterway, and	No impacts on the use and enjoyment of the public waterway.	Yes
(e) opportunities to provide continuous public access along the foreshore and to the waterway will not be compromised, and	No impacts on the use or access along the public waterway.	Yes
(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	No works will impact on sensitive features of the foreshore.	Yes
(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	The proposed covered awning structure will cover an existing deck and will tie into the aesthetic of the existing dwelling, resulting in a suitable and contextually appropriate addition.	Yes
(h) sea level rise, coastal erosion and recession, or change of flooding patterns as a result of climate change, have been considered.	The works in the foreshore area are minor and will not change the compatibility of the dwelling to coastal erosion or climate change.	Yes
(4) In deciding whether to grant		

TABLE 3: RELEVANT PROVISIONS OF PITTWATER LEP 2014		
Provision	Proposal	Complies
consent for development in the foreshore area, the consent authority must consider whether and to what extent the development would encourage the following—		
(a) continuous public access to and along the foreshore through or adjacent to the proposed development,	No impacts on use or access along public foreshore.	Yes
(b) public access to link with existing or proposed open space,	Not necessary given the existing public access to the foreshore.	Yes
(c) public access to be secured by appropriate covenants, agreements or other instruments registered on the title to land,	N/A	N/A
(d) public access to be located above mean high water mark,	Existing public access to the foreshore will be maintained.	Yes
(e) the reinforcing of the foreshore character and respect for existing environmental conditions.	The alterations to the existing dwelling will maintain the aesthetic of the existing dwelling within the foreshore context.	Yes

In light of the above, the proposed development is consistent with all relevant provisions of Pittwater LEP 2014.

4.1.4 Pittwater Development Control Plan

A response to the relevant provisions of Pittwater DCP as they apply to dwelling houses in the C4 – Environmental Living zone and the Pittwater Locality is provided at Table 4 below.

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP		
Provision	Proposal	Complies
Part B – General Controls		
B3 – Hazard Controls B3.3 – Coastline (Beach)		
All development on land to which this control applies must comply with the requirements of the Coastline Risk Management Policy for Development in Pittwater	The alterations and additions to the dwelling maintain the existing floor levels, largely maintain the existing building footprint and is located above the projected 2050 Estuarine Planning Levels for the site. The alterations and additions to the existing dwelling generally maintain the south-western alignment of the existing dwelling and will not give rise to any additional risk as a result of Coastal processes.	Yes
B3.7 Estuarine Hazard – Low Density Residential Development		
<u>Obtaining Estuarine Planning Level</u>		
To apply this control, the Estuarine Planning Level must first be established by Obtaining Estuarine Planning Level	The design team engaged with Council to determine that an Estuarine Planning Level of RL2.2 applies to the	Yes

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP

Provision	Proposal	Complies
(EPL) advice from Council	subject site.	
General Controls		
The following applies to all development:		
<ul style="list-style-type: none"> All development or activities must be designed and constructed such that they will not increase the level of risk from estuarine processes for any people, assets or infrastructure in surrounding properties; they will not adversely affect estuarine processes; they will not be adversely affected by estuarine processes; and, 	The existing dwelling occupies a small part of the site that is affected by the Estuarine Planning Level (EPL). The proposed works are almost entirely located behind the identified EPL at the site. The only works forward of the EPL relate to the small awning that will extend over the existing deck. We note that the existing deck is raised above natural ground level and is above the EPL at the site.	Yes
<ul style="list-style-type: none"> All structural elements below the Estuarine Planning Level shall be constructed from flood compatible materials; and, 	No works proposed below the EPL.	Yes
<ul style="list-style-type: none"> All structures must be designed and constructed so that they will have a low risk of damage and instability due to wave action and tidal inundation; and, 	No works proposed below the EPL.	Yes
<ul style="list-style-type: none"> All electrical equipment, wiring, fuel lines or any other service pipes and connections must be waterproofed to the Estuarine Planning Level; and, 	No works proposed below the EPL.	Yes
<ul style="list-style-type: none"> The storage of toxic or potentially polluting goods, materials or other products, which may be hazardous or pollute the waterway, is not permitted below the Estuarine Planning Level; and, 	No storage of toxic or hazardous substances at the residential dwelling.	Yes
<ul style="list-style-type: none"> For existing structures, a tolerance of up to minus 100mm may be applied to the Estuarine Planning Level in respect of compliance with these controls. 	Noted, however, no works to existing elements that are located below the EPL. The proposed awning and associated structural posts will be located above the existing deck at RL2.5 and therefore will be well clear of the projected EPL.	Yes
<ul style="list-style-type: none"> To ensure Council's recommended flood evacuation strategy of 'shelter-in-place', it will need to be demonstrated that there is safe pedestrian access to a 'safe haven' above the Estuarine Planning Level. 	Egress from the site to the street is available above the EPL.	Yes
Floor Levels - New Development and Additions		
All floor levels within the dwelling,	The existing external deck and internal	Yes

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP		
Provision	Proposal	Complies
including floor levels of the existing dwelling, but excluding open balconies (with open balustrades), shall be at, or above, or raised to the Estuarine Planning Level.	floor level at the site is located at or above RL2.5 and is therefore above the ELP of RL2.2 that applies to the subject site.	
B6.3 Off-street Parking <u>Parking Requirements (dwellings)</u> Parking for Dwellings with 2 or more bedrooms – 2 parking spaces.	No change to existing off street parking at the site.	Yes
B8.2 Erosion and Sediment Control Erosion and sedimentation prevention measures must be installed on all sites to prevent the migration of sediment off the site into any waterway, drainage systems, public reserves, road reserve or adjoining private lands.	Refer to the accompanying Construction Management Plan for suitable measures to be provided during construction.	Yes
B8.3 Waste Minimisation Waste materials generated through demolition, excavation and construction works is to be minimised by reuse on-site, recycling, or disposal at an appropriate waste facility.	Council may wish to impose a suitable condition of development consent.	Yes
Section C – Development Types (Residential Development)		
C1.1 Landscaping At least 2 canopy trees in the front yard and 1 canopy tree in the rear yard are to be provided on site 60% of the front setback for a single dwelling house is to be landscaped Development shall provide for the reasonable retention and protection of existing significant trees, especially near property boundaries, and retention of natural features such as rock outcrops. Canopy trees are to be located a minimum of 5 metres from existing and proposed built structures, or minimum of 3 metres where pier and beam footings are used.	Existing canopy trees are maintained at the site. No change to existing landscaping within the front setback. No impacts on the existing significant trees at the site. Existing canopy trees are to be maintained and no works will encroach into the existing TPZ areas.	Yes Yes Yes Yes
C1.2 Safety and Security Building design should allow visitors who approach the front door to be seen without the need to open the door. Buildings and the public domain are to be designed to allow occupants to	The proposed works will maintain the existing access control to the site via the front gate and will provide for a safe and improved pedestrian entry to the front door. The proposed works allow for continued surveillance of the public	Yes Yes

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP

Provision	Proposal	Complies
<p>overlook public places (streets, parking, open space etc) and communal areas to maximise casual surveillance</p> <p>Building entrances are to be clearly visible from the street, easily identifiable and appropriately lit.</p> <p>The street number of the property is to be clearly identifiable.</p> <p>Walkways and landscaping should be used to delineate site boundaries and direct visitors to the correct entrance and away from private areas.</p>	<p>foreshore area and maintain views from the upper level to the street frontage.</p> <p>The alterations to the existing dwelling will improve the legibility of the dwelling entrance.</p> <p>Existing street numbering will be maintained.</p> <p>The entry gate and pedestrian pathway clearly defines the entry to the front door of the dwelling.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>C1.3 View Sharing</p> <p>All new development is to be designed to achieve a reasonable sharing of views available from surrounding and nearby properties.</p> <p>The proposal must demonstrate that view sharing is achieved through the application of the Land and Environment Court's planning principles for view sharing.</p>	<p>The proposed works will maintain the height and general form of the existing dwelling and will not obscure views gained by other residential properties.</p> <p>The works will not impact on existing views gained over the subject site.</p>	<p>Yes</p> <p>Yes</p>
<p>C1.4 Solar Access</p> <p>The main private open space of each dwelling and the main private open space of any adjoining dwellings are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21st.</p> <p>Windows to the principal living area of the proposal, and windows to the principal living area of adjoining dwellings, are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21st (that is, to at least 50% of the glazed area of those windows).</p> <p>Solar collectors for hot water or electricity shall receive at least 6 hours of sunshine between 8.00am and 4.00pm during mid winter.</p> <p>Developments should maximise sunshine to clothes drying areas of the proposed development or adjoining dwellings.</p>	<p>The existing primary open space areas will maintain access to compliant sunlight for at least 3 hours at mid winter. Refer to the discussion of shadow impacts on the adjoining dwelling at Section 4.2 of this Statement whereby it is demonstrated that solar access is maintained to open space areas.</p> <p>Refer to the discussion of shadow impacts on the adjoining dwelling at Section 4.2 of this Statement whereby compliance is demonstrated.</p> <p>No solar collectors are impacted by overshadowing.</p> <p>Sunlight is maintained to clothes drying areas at the site and the adjoining properties within existing north facing courtyards.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP

Provision	Proposal	Complies
C1.5 Visual Privacy Elevated decks and pools, verandahs and balconies should incorporate privacy screens where necessary and should be located at the front or rear of the building.	The north facing balcony at the first floor level will replace the existing balcony and includes screening to direct lines of sight towards the rear boundary and away from the open space areas within each adjoining property.	Yes
C1.6 Acoustic Privacy Noise-sensitive rooms, such as bedrooms, should be located away from noise sources, including main roads, parking areas, living areas and communal and private open space areas and the like.	Primary living areas are located at the ground floor level and are oriented to the north and south towards the waterway and courtyard at the site.	Yes
C1.7 Private Open Space Minimum 80m ² of private open space per dwelling at ground level, with no dimension less than 3 metres. No more than 75% of this private open space is to be provided in the front yard. Within the private open space area, a minimum principal area of 16m ² with a minimum dimension of 4m and grade no steeper than 1 in 20 (5%). Dwellings are to be designed so that private open space is directly accessible from living areas enabling it to function as an extension of internal living areas. Private open space areas are to have good solar orientation (i.e. orientated to the north-east or north-west where possible). Where site or slope constraints limit optimisation of orientation, the private open space area must have access to some direct sunlight throughout the year (see Solar Access). Private open space should be located to the rear of the dwelling to maximise privacy for occupants.	Private open space areas are provided that exceed this requirement in the form of north and south facing areas of open space. Compliant open space areas are maintained for the dwelling house. Open space areas are directly accessible from the floor primary internal living areas. Open space areas area maintained and have good access to sunlight. Principal areas of private open space are located at the rear of the dwelling facing toward the waterway.	Yes Yes Yes Yes
C1.12 Waste and Recycling Facilities 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	Refer to the accompanying Waste Management Plan submitted with this application.	Yes

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP		
Provision	Proposal	Complies
C1.23 Eaves		
Dwellings shall incorporate eaves on all elevations.	The existing dwelling contains eaves and parapet elements that are maintained as part of the proposed works.	Yes
Eaves must be a minimum of 450mm in width, excluding any fascia/barge boards and gutters.	Eaves and shading structures are provided to the requirements of SEPP (BASIX) 2004.	Yes
Section D – Locality Specific Controls (Palm Beach Locality)		
Character as Viewed from Public Place		
Buildings which front the street must have a street presence and incorporate design elements (such as roof forms, textures, materials, the arrangement of windows, modulation, spatial separation, landscaping etc) that are compatible with any design themes for the locality.	The proposed works are located internally to the site and are mostly screened by existing mature vegetation and the detached garage and studio that is constructed to the street boundary.	Yes
Walls without articulation shall not have a length greater than 8 metres to any street frontage.	The street fronting façade is appropriately articulated.	Yes
Any building facade to a public place must incorporate at least two of the following design features: a. entry feature or portico; b. awnings or other features over windows; c. verandahs, balconies or window box treatment to any first floor element; d. recessing or projecting architectural elements; e. open, deep verandahs; or f. verandahs, pergolas or similar features above garage doors.	The street front elevation contains an balcony and clearly defined entry pedestrian entry.	Yes
Parking structures should be located behind the front building line, preferably set back further than the primary building, and be no greater in width than 50% of the lot frontage, or 7.5 metres, whichever is the lesser	No change to existing garage that is constructed to the primary boundary.	Yes
Scenic Protection		
Development shall minimise any visual impact on the natural environment when viewed from any waterway, road or public reserve.	The proposed works will maintain the overall form, scale and presentation of the existing dwelling when viewed from the foreshore area. The proposed works include a covered external area located over the existing deck which is integrated and complementary to the existing form and residential context.	Yes

TABLE 4: RELEVANT PROVISIONS OF PITTSWATER DCP

Provision	Proposal	Complies
Building Colours and Materials External colours and materials shall be dark and earthy tones	External colours for the proposed works will maintain the existing aesthetic of the dwelling as detailed on the accompanying material schedule.	Yes
Front Building Line Nil for garages only, 3 for all other structures including fences.	No change to the setback of the existing garage and studio building as they present to Iluka Road. The proposed works to the existing dwelling will be setback more than 3m from the street frontage.	Yes
Side or Rear Building Line <u>Side</u> 2.5m to at least one side; 1.0 for other side <u>Rear</u> 6.5 (rear) unless Foreshore Building Line applies	<p><u>Eastern Façade</u> – setback of 1m maintained to the eastern side boundary for the proposed works.</p> <p><u>Western façade</u> – Small portion of the existing façade is extended to the existing alignment of 915mm in respect of the proposed alterations to the bathroom for Bed 2 and the level above. This façade otherwise is setback at the existing alignment of 2.9m to the western boundary. The relationship at this boundary interface is entirely consistent with the intention of the setback controls.</p> <p>N/A – foreshore building line control applies to the rear boundary.</p>	Yes Existing N/A
Building Envelope Building envelope to be applied as a 45 degree line measures 3.5m above each side boundary.	The DCP envelopes have been applied to the proposed Northern Elevation below and the proposal results in a minor departure at the first floor levels as shaded yellow at the first floor levels of the eastern and western façades	On Merit

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP

Provision	Proposal	Complies
	<p>Despite the small projections into the building envelope requirement at the first floor levels, the proposal is considered to be acceptable on merit for the reasons detailed below:</p> <ul style="list-style-type: none"> • The proposed alterations and additions maintain the same setbacks and relationship at the ground and first floor levels as the existing southern portion of the dwelling; • At the eastern façade, the proposed works will extend the dwelling by 1m, resulting in a negligible change to the existing relationship at the eastern boundary. The non-compliant first floor element is suitable as it is not readily distinguishable from the scale and relationship of the existing dwelling when viewed from No. 28-30 Iluka Road; • At the western boundary, the proposal includes the provision of a courtyard and modified northern footprint that maintains the same scale and 1m setback relationship to the western boundary. <p>The non-compliant portion at the first floor level is a modest 5.5m long element that relates to a bedroom. There are no windows within the western façade and this portion of the dwelling has an overall height of 6m above ground level.</p> <p>This non-compliance is appropriate as it maintains the relationship of the southern portion of the existing dwelling and presents as a well articulated façade.</p> <p>The proposed addition does not give rise to any significant additional overshadowing to the northern courtyard of the adjoining dwelling as detailed in the submitted shadow diagrams.</p> <p>Accordingly the non-compliances at</p>	

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP

Provision	Proposal	Complies
	<p>the first floor levels are acceptable as the additions maintain the same presentation and relationship to each side boundary with suitable additions that do not give rise to any measurable overshadowing or privacy impacts. In addition, each side facing façade is well articulated and represents a suitable form that is consistent with the intention of the control and the spatial context of the area.</p> <p>As the outcomes of the control are met, Council should have comfort in the application of flexibility in the circumstances given the reasonable alternative to strict numerical compliance.</p>	
<p>Landscaped Area (environmentally sensitive land)</p> <p>The total landscaped area on land zoned R2 Low Density Residential or E4 Environmental Living shall be 60% of the site area.</p> <p>For single dwellings on land zoned R2 Low Density Residential or E4 Environmental Living, up to 6% of the total site area may be provided as impervious landscape treatments providing these areas are for outdoor recreational purposes only (e.g. roofed or unroofed pergolas, paved private open space, patios, pathways and uncovered decks no higher than 1 metre above ground level (existing)).</p>	<p>Site Area – 517.9m² Required LA – 60% or 310.74m² Impervious Allowance – 31m² Landscaped area less impervious area – 279.74m².</p> <p><u>Existing:</u> As demonstrated on the accompanying Landscaped Area Calculation Drawings, the existing dwelling at the site comprises a landscaped area of 247.22m² (47.74%) and an impervious landscape area of 86.01m² or 16.6%.</p> <p>Collectively the existing pervious and impervious landscaped area comprises 333m² or 64% of the site area. Whilst the total landscaped area complies at the site, the degree of existing impervious areas exceed the maximum 6% allowed and as such the existing dwelling does not strictly comply with the DCP control.</p> <p><u>Proposal:</u> The proposed works will reconfigure the existing landscaped area resulting in the following:</p> <ul style="list-style-type: none"> A 34.5m² increase in landscaped area, to result in a total landscaped area of 281.78m² or 54.41% of the site area. Accordingly, the landscaped area complies with the minimum requirement less the impervious 	<p>Existing</p> <p>Yes</p>

TABLE 4: RELEVANT PROVISIONS OF PITTWATER DCP		
Provision	Proposal	Complies
	<p>allowance of 31m²;</p> <ul style="list-style-type: none"> Some impervious landscaped area is maintained and some is reduced resulting in an impervious landscaped area of 42.65m² or 8.24% of the site area; Collectively, the landscaped area (pervious and impervious) is 324.43m² and exceeds the minimum requirement. <p>Having regard to the above, the proposal will reconfigure the existing landscaped area at the site to provide more impervious landscaped area, meeting the minimum requirements under the DCP.</p>	
<p>Fences</p> <p>Front fences and side fences (within the front building setback) shall:</p> <ul style="list-style-type: none"> 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. <p>Fencing is permitted along the rear and side boundaries (other than within the front building setback) to a maximum height of 1.8 metres.</p>	<p>No changes to front fencing.</p> <p>No changes to side boundary fencing.</p>	<p>-</p> <p>-</p>

In light of the above, the proposal has been designed to achieve a high level of compliance with the relevant provisions of the Pittwater DCP 2014. All variations sought are minor and are suitable having regard to the alterations to the existing dwelling house and immediate context.

4.2 Impacts on Natural & Built Environment (Section 4.15(1)(b))

Natural Environment

The proposal seeks to construct alterations and additions to an existing dwelling house and in doing so will not impact on any established trees or sensitive features of the site.

There are no identified natural site features or biodiversity that will be impacted by the proposed dwelling and all proposed works are designed to comply with BASIX requirements therefore achieving the necessary sustainability outcomes.

In the absence of any significant environmental features at the site or impacts on sensitive natural features of the site, the proposal will have acceptable impacts on the natural environment.

Built Environment

The proposed development has been designed to achieve a high level of compliance with the relevant controls of the LEP and DCP which ultimately intend on managing the impacts of development on the streetscape and the residential amenity of the adjoining properties. In addition to the level of compliance proposed, the proposal does not give rise to any material impacts on the built environment as detailed below.

Privacy: The alterations and additions will maintain the existing functionality of the dwelling within an increased building envelope that maintains active living areas at the ground floor level and bedrooms within the level above.

The alterations and additions to the existing dwelling have been designed with the following passive design measures that promote excellent reciprocal privacy outcomes between future occupants and the existing neighbours:

- The ground floor level maintains the primary entry and living areas for the dwelling. Existing window openings are maintained towards the waterway and proposed windows are oriented towards the northern courtyard other than the kitchen splash back window or the window to the stair that extends to the basement level;
- The reconfigured dwelling entry does not contain east facing windows and acts as a passive screen between the living areas at the site and that of the adjoining dwelling;
- Deep soil landscaped areas are maintained at each side boundary that facilitate screen planting and passive separation between outdoor open space area;
- The proposed covered roof and enclosed external area facing the waterway will maintain high amenity external living areas whilst also screening active external open space areas from each adjoining neighbour;
- At the first floor level, windows locations are designed to direct lines of sight away from sensitive interfaces whilst promoting excellent outlooks and amenity from first floor bedrooms;
- The first floor balconies facing north and south are located on significant side boundary setbacks and fitted with screens that preclude lines of sight towards sensitive internal and external living areas of each adjoining dwelling.

In light of the above, the proposal incorporates design measures that promote passive separation and privacy between future residents and the adjoining dwellings.

Overshadowing: In relation to overshadowing impacts, the proposal is located on a north-east to south-west axis and adjoins a residential property at each side boundary. The submitted shadow diagrams detail the existing shadow cast by the proposal and the incremental additional overshadowing impacts associated with the proposed works.

In determining acceptable overshadowing impacts, the DCP requires that:

*The main **private open space** of each dwelling and the main private open space of any adjoining dwellings are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21st.*

*Windows to the principal living area of the proposal, and **windows to the principal living area of adjoining dwellings**, are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21st (that is, to at least 50% of the glazed area of those windows).*

Solar collectors for hot water or electricity shall receive at least 6 hours of sunshine between 8.00am and 4.00pm during mid winter.

Each adjoining dwelling achieves compliance with the relevant DCP controls as detailed below:

No. 34 Iluka Road: The shadow diagrams detail that there will be negligible additional overshadowing from the proposal at 9.00am at mid winter and this dwelling is otherwise entirely unaffected by shadow cast from the proposed alterations and additions.

No. 28-30 Iluka Road: The shadow diagrams detail that this adjoining dwelling will be unaffected by shadow cast by the proposed works up until 2.00pm at mid winter with the additional shadow cast being minor and incidental to elements of the proposal that are entirely compliant with applicable planning controls. The additional shadow cast by the proposal is minor and does not impact on the required sunlight to living room windows and open space for this dwelling.

Given that the proposed works result in shadow impacts that are minor and consistent with the requirements of the DCP, the shadow cast by the proposal is acceptable.

View Sharing: The proposed works include alterations and additions to an existing dwelling and in doing so will maintain the existing height and spatial relationship of the dwelling to each side boundary. As such, the proposed works will not impact on any views gained over the roof of the dwelling or along view corridors at each side boundary.

Having regard to the configuration of the existing dwelling and the extent of works proposed, the alterations and additions to the existing dwelling will have no additional view impacts and is accordingly acceptable.

Social and Economic Impacts: The proposal includes alterations and additions to an existing dwelling that is appropriate to the context and intention of the zone. As such the proposal will only have positive economic and social impacts.

4.3 The Suitability of the Site (Section 4.15(1)(C))

The development is permissible with consent from Council in the *C4 Environmental Living* zone. The subject site is located within an established residential area with no identified hazards that would suggest that the proposed development is unsuitable at the site. The site is located within the coastal area and is identified as being low flood risk, the proposed works are compatible with each hazard and therefore suitable at the site.

In the absence of any natural or built environmental impacts as detailed above, the proposed development is suitable at the site.

4.4 The Public Interest (Section 4.15(1)(e))

The proposed use is permissible with development consent, is consistent with zone objectives and complies with all relevant aspects of the LEP. In addition, the proposal is largely compliant with the DCP controls except where intrinsic site factors provide compelling grounds for the minor departures proposed. Accordingly, the proposed development is in the public interest and worthy of Council's support.

5 CONCLUSION

This statement of environmental effects has detailed the specifics of the site and its context and outlines the proposal to construct alterations and additions to the existing dwelling house.

The application has been considered in accordance with the matters for consideration pursuant to Section 4.15 of the Environmental Planning and Assessment Act, 1979. The proposal is permissible with consent from Council and complies with all relevant provisions of Council's LEP.

In addition, the proposal achieves a high level of compliance with the DCP unless justification is provided for minor the minor departures based on intrinsic site factors and achieving the outcomes of each control. The design is responsive to the site context and character of the area, resulting in an improved built form and contribution to the foreshore locality.

As detailed in this Statement, the proposal will not give rise to any unacceptable impacts on the natural and built environment and will provide improve residential accommodation within the highly desirable location.

The proposal is suitable for the site and in the interest of the public and it is therefore requested that Council support the subject application.