

STATEMENT OF ENVIRONMENTAL EFFECTS

FOR

PROPOSED ALTERATIONS AND ADDITIONS TO AN EXISTING DWELLING

LOCATED AT

21 KNIGHTSBRIDGE AVENUE, BELROSE

FOR

MR & MRS MACMAHON



**Prepared
August 2022**

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1.0 Introduction

This Statement of Environmental Effects accompanies architectural plans prepared on behalf of Nicole and James MacMahon by Northern Beaches Designs, Job Number 2142, Drawings No's. DA1 – DA16, dated 8 June 2022, detailing the proposed construction of alterations and additions to an existing dwelling at **21 Knightsbridge Avenue, Belrose**.

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

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

- *The Environmental Planning and Assessment Act, 1979 as amended*
- *The Environmental Planning and Assessment Regulation 2000*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *Warringah Local Environmental Plan 2011*
- *Warringah Development Control Plan*

2.0 Property Description

The subject allotment is described as 21 Knightsbridge Avenue, Belrose, being Lot 17 within Deposited Plan 237441 and is zoned R2 Low Density Residential within the provisions of the Warringah Local Environmental Plan 2011.

The site is not listed as a heritage item, nor is not located within a conservation area.

The land is noted as being Landslip Area A and given no substantial site disturbance is proposed, no further geotechnical investigation is considered to be necessary in this instance.

The land is also noted as being Low and Medium Risk Flood Prone Land and accordingly a Flood Assessment has been prepared by Taylor Consulting, dated 25 July 2022. This issue will be discussed further within this statement.

There are no other hazards noted as affecting the land.

3.0 Site Description

The property is a regular shaped allotment located on the southern side of Knightsbridge Avenue, opposite the intersection with Hampden Street and west of Forestway. The site is regular in shape with a width of 18.29m and a depth of 45.72m. The total site area is 836.1m².

Stormwater from the site is directed via gravity to the street gutter in Knightsbridge Avenue.

The site is currently developed with a single storey brick dwelling with a tile roof. Vehicular access is available via a concrete driveway from Knightsbridge Avenue with parking provided within the attached single garage.

The details of the site are as indicated on the survey plan prepared by Waterview Surveying Services, Reference No. 1475, dated 3 December 2021, which accompanies the DA submission.

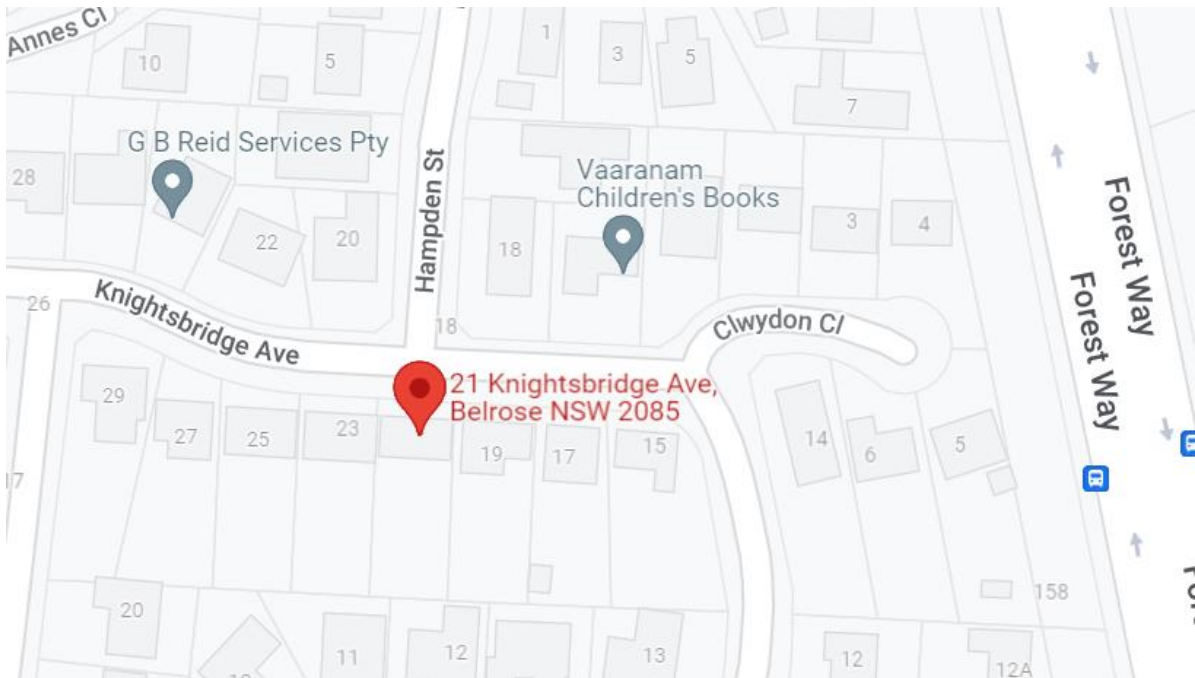


Fig 1: Location of Subject Site
(Source: Google Maps)



Fig 2: View of the subject site, looking south from Knightsbridge Avenue



Fig 3: View of the subject site and streetscape to the west, looking south-west



Fig 4: View of the subject dwelling and neighbouring property at No 19 Knightsbridge Avenue, looking south-east

4.0 The Surrounding Environment

The general vicinity of the site is characterised by residential dwellings and a range of detached outbuildings, of a variety of architectural styles.

The varying age of development in the area has resulted in a mix of materials and finishes, with the development in the area generally presenting a consistent setback to the public domain.

The surrounding properties comprise a range of original style dwellings with an emergence of modern dwellings and additions. The surrounding dwellings comprise a mix of single and two storey dwellings.

The site and its surrounds are depicted in the following aerial photograph:

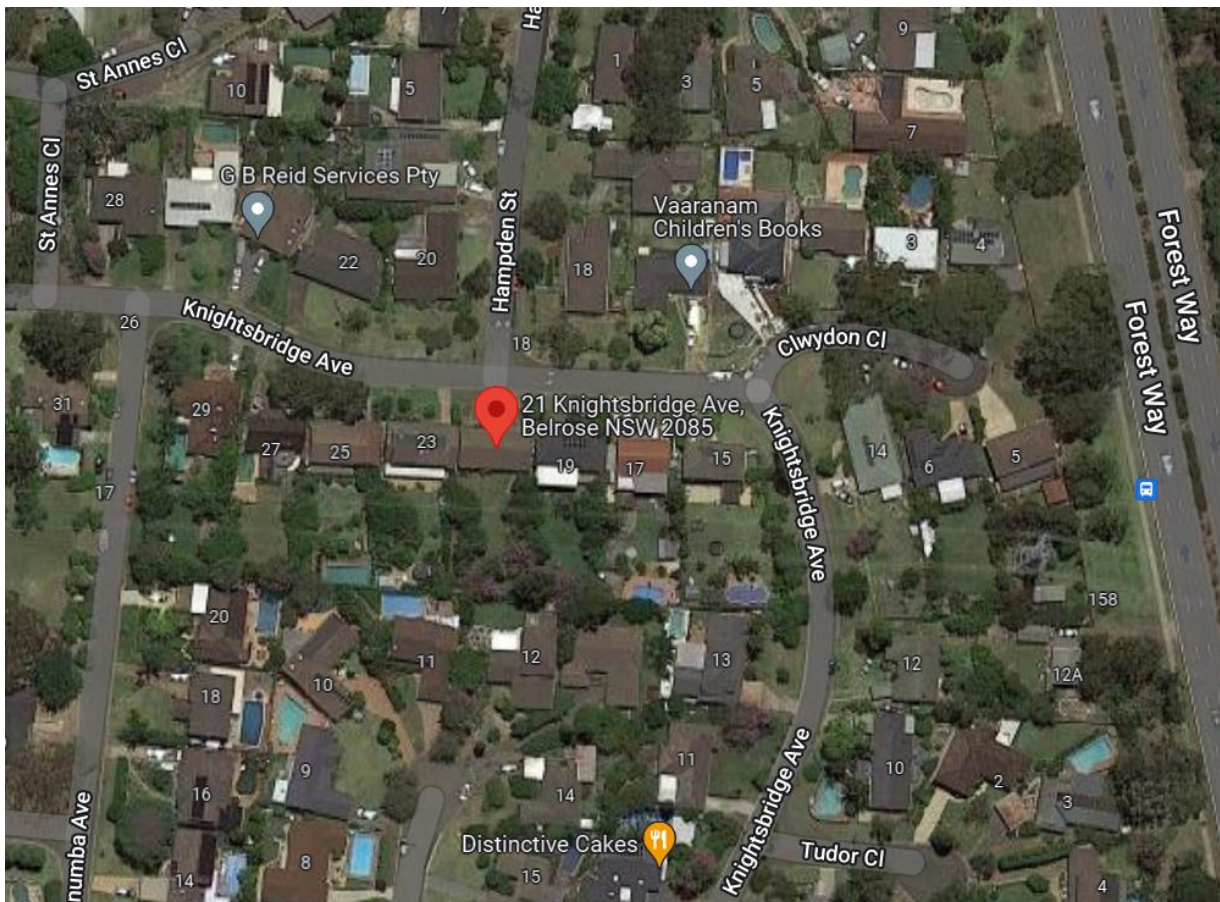


Fig 5: Aerial view of locality
(Source: Google Maps)

5.0 Proposed Development

As detailed within the accompanying plans, the proposal seeks consent for construction of alterations and additions to the existing dwelling.

The proposed works comprise:

Ground Floor:

- Alterations and additions to existing ground floor level to provide for internal staircase to proposed first floor level

First Floor:

- Proposed first floor addition to provide for master bedroom with balcony, ensuite and walk in robe, two bedrooms, bathroom and rumpus room

The new works will provide for contemporary style low profile pitched roof form with skylights to allow light to the proposed first floor addition. The construction of the proposed additions will provide timber framing with light weight weatherboard cladding and metal roofing. The external colours and finishes have been detailed within Sheet DA1.

The collected roofwaters will be continue to be directed to the street gutter in Knightsbridge Avenue in accordance with existing arrangements.

The new works are located over the existing disturbed areas, and maintain a generous area of soft landscaping. The proposal will not require the removal of any significant vegetation in order to accommodate the new works.

The proposal results in the following development indices:

Site Area:	836.1m ²
Required Landscaped Area:	40% or 334.44m ²
Proposed Landscaped Area:	73.3% or 612.97m ² (inclusive of areas less than 2m in width - see DCP discussion)

6.0 Zoning and Development Controls

6.1 State Environmental Planning Policy (Resilience and Hazards) 2021

SEPP (Resilience and Hazards) 2021 and in particular Clause 4.6(1)(a) suggests that a consent authority must not grant consent to the carrying out of any development on land unless it has considered whether the land is contaminated.

Given the history of residential use of the land, the site is not considered to be subject to contamination and further investigation is not required at this stage.

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

The proposal meets water, thermal and energy standards required by BASIX. A Basix Certificate has been prepared to support the proposed development and the BASIX Commitments have been detailed within the architectural plans.

6.3 Warringah Local Environmental Plan 2011

The land is zoned R2 Low Density Residential under the provisions of the WLEP 2011.

The proposed works to the dwelling to provide for additions and alterations including a new first floor are permissible in the R2 zone.



Fig 6: Extract of Warringah Local Environmental Plan 2011

The development of and use of the land for residential purposes is consistent with the zone objectives, which are noted over as:

- *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.*

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

- The proposal will be consistent with and complement the existing detached style housing within the locality.
- The proposed development respects the scale and form of other new development in the vicinity and therefore compliments the locality.
- The setbacks are compatible with the existing surrounding development.
- The proposal will not see any alteration to the existing landscaped area of the site and will not unreasonably affect long distance views for the surrounding properties.

Clause 4.3 provides controls relating to the height of buildings.

The dictionary supplement to the LEP notes building height to be:

building height (or height of building) means the vertical distance between ground level (existing) and the highest point of the building, including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like.

The building height limit for development in this portion of Belrose is 8.5m. The proposed new roof form will result in a maximum height of 8.3m above natural ground level and therefore comply with Council's maximum building height.

Clause 5.21 – Flood planning

The site is identified as Low and Medium Risk Flood Prone Land. The proposal is accompanied by a Flood Management Report which has been prepared by Taylor Consulting dated 25 July 2022.

The Flood Management Report concludes:

The property is located outside the 1% Annual Exceedance Probability (AEP) flood extents and the existing floor level is above the Probable Maximum Flood (PMF) of 0.3m above the natural surface level on the western boundary of the property. The significant flows are within the adjacent properties to the south. It is proposed that the occupants shelter-in-place during a major storm event.

The proposed works will be carried out outside and above the extents of the 1% AEP flood and as such the works do not require special flood proofing or freeboard related measures. In particular the development is in compliance with Clause 3.5 of the State Environmental Planning Policy (2008).

Consequently the proposed works are considered satisfactory with respect to flooding of the site and it is considered that a site-specific Flood Risk Management Plan is not considered warranted in this instance.

The proposal will therefore comply with the provisions of this clause.

Clause 6.2 relates to earthworks.

The proposal will not involve any substantial disturbance to the existing site conditions, with no further investigation of the site conditions are considered to be necessary in this instance.

Additionally, the works will be carried out in accordance with the recommendations of a qualified Structural Engineer.

Clause 6.4 relates to development on sloping land.

The land is noted as being Landslip Area A, however given no substantial site disturbance is proposed, no further geotechnical investigation is considered to be necessary in this instance.

There are no other clauses of the WLEP 2011 that are considered to be relevant to the proposed development. It is considered that the proposal achieves the requirements of the WLEP.

6.4 Warringah Development Control Plan

The relevant numerical and performance based controls under WDCP are discussed below:

Part B - Built Form Controls			
Standard	Required	Proposed	Compliance
B1 – Wall heights	Max 7.2m	The maximum proposed wall height is approximately 6.4m and readily complies with this control.	Yes
B2 – Number of storeys	No requirement identified on map		N/A
B3 – Side Boundary Envelope and Side Setback	Building envelope 45 degrees from 5m. Setback 0.9m	<p>The proposed first floor addition will present a minor variation to the building envelope control to the eastern and western elevations, as noted in the submitted sections.</p> <p>The minor breach of the building envelope does not result in loss of views or unreasonable or excessive overshadowing to the adjacent neighbour and is therefore considered to be acceptable on merit.</p> <p>The bulk and scale and massing of the proposed works is considered to be reasonable and the setbacks are adequate to offset any issues in relation to bulk and scale when viewed from the neighbouring</p>	Yes – on merit

		properties or from the street domain.	
B4 – Site Coverage	No requirement identified on map		N/A
B5 – Side Boundary setbacks	R2 zoned land 0.9m	<p>The proposed first floor addition will stand 1.5m from the eastern and western boundaries respectively.</p> <p>The proposed setbacks will exceed Council's minimum setback control.</p>	Yes
B6 – Merit assessment of Side Boundary Setbacks	No requirement identified on map		N/A
B7 – Front Boundary Setbacks	Minimum 6.5m	<p>The proposed new works are generally sited over the existing building footprint and will therefore stand a minimum of 6.26m from the front boundary.</p> <p>The objectives of this control are as follows:</p> <ul style="list-style-type: none"> • <i>To create a sense of openness.</i> • <i>To maintain the visual continuity and pattern of buildings and landscape elements.</i> • <i>To protect and enhance the visual quality of streetscapes and public spaces.</i> • <i>To achieve reasonable view sharing.</i> <p>The proposal presents only a minor variation</p>	Yes – on merit

		<p>to the front setback, and maintains a sense of openness to the Knightsbridge Avenue streetscape.</p> <p>The proposed alterations and additions present a modest two storey scale which is in keeping with the bulk and scale of existing surrounding development.</p> <p>The proposed new works will not result in any unreasonable view impacts for neighbouring properties.</p> <p>Notwithstanding the minor variation to the front setback control, the proposal is in keeping with the desired outcomes of this clause and is worthy of support on merit.</p>	
B8 – Merit assessment of front boundary setbacks	No requirement identified on map		N/A
B9 – Rear Boundary Setbacks	<p>Min 6m rear setback</p> <p>R2 Zoned land swimming pool not to exceed 50% of rear setback area.</p>	No new works to be carried out in the rear setback.	<p>Yes</p> <p>N/A</p>
B10 – Merit Assessment of rear boundary setbacks	No requirement identified on map		N/A

B11 – Foreshore Building Setback	No requirement identified on map		N/A
B12 – National Parks Setback	No requirement identified on map		N/A
B13 – Coastal Cliffs Setback	No requirement identified on map		N/A
B14 – Main Roads Setback	No requirement identified on map		N/A
B15 – Minimum Floor to Ceiling Height	No requirement identified on map		N/A
Part C – Siting Factors			
C2 – Traffic, Access and Safety	Vehicular crossing to be provided in accordance with Council's Vehicle Crossing Policy	The existing vehicle crossing will be maintained.	Yes
C3 – Parking Facilities	Garages not to visually dominate façade Parking to be in accordance with AS/NZS 2890.1	The site currently provides for an attached single garage. The proposal will not alter the existing car parking arrangements.	Yes
C4 – Stormwater	Hydraulic Design to be provided in accordance with Council's Stormwater Drainage Design Guidelines for Minor Developments and Minor Works Specification	Existing stormwater directed to Council drainage system in Knightsbridge Avenue. The proposed new roof areas will be connected to the existing system, with stormwater to be directed to the street gutter.	Yes
C5 – Erosion and Sedimentation	Soil and Water Management required	The proposal will provide for sediment and erosion control during the construction period.	Yes
C6 – Building over or adjacent to Constructed Council Drainage Easements	N/A		N/A

C7 – Excavation and Landfill	Site stability to be maintained	No excavation is required to accommodate the proposed additions.	Yes
C8 – Demolition and Construction	Waste management plan required	Waste management measures to be employed	Yes
C9 – Waste Management	Waste storage area to be provided	Bins storage provided adjacent to garage	Yes
Part D – Design			
D1 – Landscaped Open Space and Bushland	Min 40% Landscaped Area to be maintained	<p>The proposal will retain a landscaped area of 612.97m² or 73.3% of the site area which includes mind areas less than 2 m in width however the total quantum of landscaping the site will comfortably achieve Council's control.</p> <p>The development within the site will continue to achieve the Objectives of the controls, which are noted as:</p> <p>Objectives</p> <ul style="list-style-type: none"> • To enable planting to maintain and enhance the streetscape. • To conserve and enhance indigenous vegetation, topographical features and habitat for wildlife. • To provide for landscaped open space with dimensions that are sufficient to enable the establishment of low lying shrubs, medium high shrubs and canopy trees of a 	Yes

		<p><i>size and density to mitigate the height, bulk and scale of the building.</i></p> <ul style="list-style-type: none"> <i>• To enhance privacy between buildings.</i> <i>• To accommodate appropriate outdoor recreational opportunities that meet the needs of the occupants.</i> <i>• To provide space for service functions, including clothes drying.</i> <i>• To facilitate water management, including on-site detention and infiltration of stormwater.</i> <p>The proposal will provide for sufficient area for the private open space and recreational requirements of the owners, and will not see the removal of any significant vegetation.</p>	
D2 – Private Open Space	<p>Dwelling houses with three or more bedrooms</p> <p>Min 60m² with min dimension 5m</p>	<p>The existing private open space within the rear yard is maintained. The private open space is directly accessible from the dwelling, with good access to the northern sun.</p>	Yes
D3 – Noise	<p>Mechanical noise is to be attenuated to maintain adjoining unit amenity.</p> <p>Compliance with NSW Industrial Noise Policy Requirements</p>	<p>Given the residential nature of the proposal, no noise impacts are anticipated.</p>	Yes

D4 – Electromagnetic Radiation	N/A to proposed development		N/A
D5 – Orientation and Energy Efficiency	Dwellings to be orientated to receive northern sun Appropriate construction to enhance thermal properties and ventilation/natural cooling Compliance with SEPP (BASIX) requirements	The site enjoys good access to northern sun to the front and rear yards.	Yes
D6 – Access to sunlight	This control requires that sunlight to at least 50% of private open space to adjoining properties is not to be reduced to less than 2 hours between 9am and 3pm on the winter solstice.	As detailed in the shadow analysis prepared by Northern Beaches Designs (Sheet DA11-DA13), due to the north-south orientation of the subject and neighbouring lots, the proposal will not result in any unreasonable overshadowing to the adjoining neighbours.	Yes
D7 – Views	View sharing to be maintained	The controls require that development should enable the reasonable sharing of views. The works see the construction of a first floor addition to the existing dwelling. The modest roof height and low profile roof form of the new works will ensure that the primary outlook for the surrounding properties is not diminished.	Yes
D8 – Privacy	This clause specifies that development is not to cause unreasonable	The modest nature of the proposed works will not considered to result in any adverse	Yes

	overlooking of habitable rooms and principle private open space of adjoining properties	privacy impacts to neighbouring properties.	
D9 – Building Bulk	This clause requires buildings to have a visual bulk and architectural scale that is consistent with structures on nearby and adjoining properties and not to visually dominate the street or surrounding spaces	The existing surrounding development comprises a mix of one and two storey dwellings. The form of the proposed development is compatible in height and scale to other development in the immediate vicinity within Knightsbridge Avenue.	Yes
D10 – Building Colours and materials		The proposed new works will be finished in colours which complement the existing development on site and the locality.	Yes
D11 – Roofs	The LEP requires that roofs should not dominate the local skyline.	The proposed low pitch roof profile will not dominate the local skyline.	Yes
D12 – Glare and Reflection	Glare impacts from artificial illumination minimised. Reflective building materials to be minimised	The existing external finishes and colours will be retained and the proposed new finishes will complement the existing dwelling. No significant glare impacts will result from proposed new works.	Yes
D13 – Front Fences and Front Walls	Front fences to be generally to a maximum of 1200mm, of an open style to complement the streetscape and not to encroach onto street	N/A – no new front fencing proposed	N/A

D14 – Site Facilities	Garbage storage areas and mailboxes to have minimal visual impact to the street Landscaping to be provided to reduce the view of the site facilities	Bin storage area is available adjacent to the dwelling. The existing mailbox is to be maintained.	Yes
D15 – Side and Rear Fences	Side and rear fences to be maximum 1.8m and have regard for Dividing Fences Act 1991	The existing side and rear fencing will be maintained.	N/A
D16 – Swimming Pools and Spa Pools	Pool not to be located in front yard or where site has two frontages, pool not to be located in primary frontage. Siting to have regard for neighbouring trees.	N/A	N/A
D17 – Tennis Courts	N/A		N/A
D18 – Accessibility	Safe and secure access for persons with a disability to be provided where required	Not applicable to residential development	N/A
D19 – Site Consolidation in the R3 and IN1 Zone	N/A		N/A
D20 – Safety and Security	Buildings to enhance the security of the community. Buildings are to provide for casual surveillance of the street.	The proposed works will not reduce the security of the street area or the subject property. Casual surveillance of the street is available from the dwelling to the street over and through the front landscaped area.	Yes
D21 – Provision and Location of Utility Services	Utility services to be provided	Normal utility services are available to the site	Yes
D22 – Conservation of Energy and Water	Compliance with SEPP BASIX	A BASIX Certificate has been provided to support the proposed development.	N/A

D23 – Signs	Building identification signage to be appropriate for proposed use and not to impact on amenity of surrounding locality. Signs not to obscure views vehicles, pedestrians or potentially hazardous road features or traffic control devices.	No signage proposed	N/A
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Part E – The Natural Environment			
E1 – Private Property Tree Management	Arboricultural report to be provided to support development where impacts to trees are presented	No significant protected trees are affected by the works.	Yes
E2 – Prescribed Vegetation	Not identified on map		N/A
E3 – Threatened species, populations, ecological communities	Not identified on map		N/A
E4 – Wildlife Corridors	Not identified on map		N/A
E5 – Native Vegetation	Not identified on map		N/A
E6 – Retaining unique environmental features	Not identified on map	No significant features within site	Yes
E7 – Development on land adjoining public open space	Not identified on map		N/A
E8 – Waterways and Riparian Lands	Not identified on map		N/A
E9 – Coastline Hazard	Not identified on map		N/A
E10 – Landslip Risk	Identified on map as Area A.	The proposal does not involve any significant change the existing site conditions and therefore no further investigation of the site conditions is considered to be necessary in this instance.	Yes
E11 – Flood Prone Land	Identified on map as Low & Medium Flood Risk.	<p>The proposal is accompanied by a Flood Management Report which has been prepared by Taylor Consulting dated 25 July 2022.</p> <p>The report concludes the following:</p> <p><i>Consequently the proposed works are considered satisfactory</i></p>	Yes

		<p><i>with respect to flooding of the site and it is considered that a site-specific Flood Risk Management Plan is not considered warranted in this instance.</i></p> <p>The proposal therefore satisfies the provisions of this clause.</p>	
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7.0 Matters for Consideration under Section 4.15 of The Environmental Planning and Assessment Act, 1979

7.1 The provisions of any environmental planning instrument

The proposal is subject to the provisions of the Warringah Local Environmental Plan 2011. It is considered that the provisions of these environmental planning instruments have been satisfactorily addressed within this report and that the proposal achieves compliance with its provisions.

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

7.2 Any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

It is not considered that there are any draft environmental planning instruments applying to the site.

7.3 Any development control plan

The development has been designed to comply with the requirements of the WLEP 2011 & the controls of the Warringah Development Control Plan.

It is considered that the proposed design respects the aims and objectives of the DCP however we note that the Environmental Planning and Assessment Amendment Act 2012 No 93 (Amendment Act) which received assent on 21 November 2012 commenced on 1 March 2013.

Key amongst the amendments are requirements to interpret DCPs flexibly and to allow reasonable alternative solutions to achieve the objectives of DCP standards.

The new section 3.42 provides that the 'principal purpose' of DCPs is to 'provide guidance' on:-

- giving effect to the aims of any applicable environmental planning instrument
- facilitating permissible development
- achieving the objectives of the relevant land zones.

The key amendment is the insertion of section 4.15(3A) which:

- prevents the consent authority requiring more onerous standards than a DCP provides,
- requires the consent authority to be 'flexible' and allow 'reasonable alternative solutions' in applying DCP provisions with which a development application does not comply,
- limits the consent authority's consideration of the DCP to the development application (preventing consideration of previous or future applications of the DCP).

We request that Council applies considered flexibility where the application seeks variations to the numerical development controls in the DCP as justified in this report. In particular, we consider that the variation to the front setback and building envelope requirements are reasonable given the constraints posed by the sloping topography of the site and the location of existing development.

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

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

7.4 Any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4

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

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

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

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

It is considered that the proposal, which seeks consent for the proposed construction of additions and alterations to the existing dwelling have been designed to appropriately minimise impacts on the amenity of adjoining properties and are compatible with and will complement the character of the area.

The proposal is considered to be well designed having regard for the relevant provisions of the SEPP, Council's LEP and DCP.

7.7 The suitability of the site for the development

The site is considered suitable for the proposed development.

The proposal will provide for the construction of additions alterations to the existing dwelling, with the gentle slope of the site and the fall towards the street not presenting any significant impediment to the construction of the proposed work.

It is suggested that the proposal will not have a detrimental impact on the amenity of the adjoining properties or any impact on the streetscape.

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

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

7.9 The public interest

The proposal will not impact upon the environment or the character of the locality and the considered location of habitable room windows and decks will mitigate any unreasonable visual impacts on the amenity of adjoining properties and is therefore considered to be within the public interest.

8.0 Conclusion

The proposal provides for the construction of ground and first floor additions to the existing dwelling.

The works provide for an appropriate two storey scale and form which is compatible with the style and range of development in the immediate locality.

Given the appropriate scale of the work, the proposal will not have a detrimental impact on the adjoining properties or the locality.

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

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