

S I M O N R O S E W E L L

a r c h i t e c t u r e • d e s i g n • p r o j e c t m a n a g e m e n t

STATEMENT OF ENVIRONMENTAL EFFECTS

FOR

ALTERATIONS AND ADDITIONS TO 3 / 28 REDDALL STREET MANLY

CONTENTS

- 1.0 INTRODUCTION
- 2.0 SITE AND CONTEXT
- 3.0 DESCRIPTION OF DEVELOPMENT
- 4.0 STATUTORY CONSIDERATIONS
 - 4.1 ENVIRONMENTAL AND ASSESSMENT ACT 1979
 - 4.2 STATE ENVIRONMENTAL PLANNING POLICY NO 55 – REMEDIATION OF LAND
 - 4.3 SREP (SYDNEY HARBOUR CATCHMENT) 2005
 - 4.4 SEPP (SYDNEY SUSTAINABILITY INDEC – BASIX) 2004
 - 4.5 MANLY LOCAL ENVIRONMENTAL PLAN 2013
- 5.0 NON STATUTORY CONSIDERATIONS
 - 5.1 MANLY DEVELOPMENT CONTROL PLAN 2013 (amendment no.16)
- 6.0 CONCLUSION

1.0 INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared for the owners of Apartments 3 / 28 Reddall Street Manly to accompany a Development Application (DA) to Northern Beaches Council (NBC).

The proposed development is located at **28 Reddall Street Manly; Lot 85 DP70416**. The site has a site area of **696.7m²** (as calculated by the surveyor) and is zoned **R1 General Residential** under Manly Local Environmental Plan (MLEP 2013).

The Development Application seeks consent for a modification to the front balcony with an awning over, alterations and additions to the existing loft, incorporating a modification to the roof, inset balconies to the front and rear, the addition of side dormers, an awning over the rear stair landing and incorporation of an accessible lift within the existing modified side bay.

This SEE has been prepared pursuant to Section 4.12 of the Environmental Planning and Assessment Act, 1979 and Clause 50 of the Environmental Planning and Assessment Regulation, 2000. The purpose of this document is to:

- describe the existing improvements on the site and their flood affected condition;
- detail the proposed development;
- review the applicable planning regime relating to the proposal;
- assess the degree of compliance; and
- examine the environmental effects of the development when measured against the Evaluation Criteria prescribed under Section 4.15 of the Environmental Planning and Assessment Act, 1979.

The SEE concludes that the proposed development is considered to be of an appropriate scale, appropriately designed and well integrated with the existing building fabric and without adversely impacting on the amenity of adjoining land by way of loss of views, overshadowing or overlooking. The proposal will fundamentally increase the utility and quality of the apartment. Accordingly, it is considered that the proposal will deliver a suitable and appropriate development within Northern Beaches LGA and is worthy of approval.

2.0 SITE AND CONTEXT

28 Reddall Street is a 3 storey residential apartment block circa 1920 on the upper side of Reddall Street, between College Street and Addison Road; with 2 levels of apartments and a partial lower garage level to the street with a storage space behind the garages. Unit 3 occupies the uppermost floor and contains a loft within the roof space comprising 92.2m².

The lot is the same size as the adjacent lots to the east, which are on the same Deposited Plan and is commensurate in size to the adjacent single dwelling at 30 Reddall Street and other dwellings and apartments in the street with the exception of the adjacent 9 storey building to the north west, 138-140 Addison Road. The façades typically comprise traditional federation brick with expressed lintels, painted timber windows with a pastiche of styles. 28 Reddall Street has traditional federation masonry over a sandstone base, cantilevered weatherboard balconies to the street, a terracotta tiled roof, two garages from the street to a partial Lower Ground Level and a central portico with thick columns over the ground floor apartment entries that are at the top of a full flight of stairs from the street. The Reddall Street façade is symmetrical in appearance. There are 3 apartments in the block; Units 1 and 2 on the ground floor with Unit 3 occupying the entire upper level.

This block, as are the other blocks in the Deposited Plan, is almost rectangular with a 15.24m street frontage and rear boundary and 45.72m side boundaries. The site area is 696.7m² and the site rises roughly 4.6m to the rear. The ground floor is just above the natural ground level at the rear and close to a full level above ground level to the street, enabling 2 garages, each with individual cross overs to the street; the partial lower ground floor being located to the front of the building. The side setbacks are 1.09m to the west, where a large apartment tower is set well away and behind the rear building line on this property and 2.29m to the east. There is adequate space and solar access around this building; the proposed works essentially comprise a re-configuration of the existing building fabric, retaining ridge line, wall lines, setbacks and essentially the same building footprint except for the slight extension of the side bay to accommodate an accessible lift. Consequently the proposed alterations and additions will contain limited environmental impact to

shadowing or privacy, noting the existing large and unchanged building separation and screening from neighbouring properties, as depicted on the Shadow Diagrams and Site Analysis Plan.



Aerial view of 28 Reddall Street



Aerial view of 28 Reddall Street

3.0 NATURE OF PROPOSED WORKS AND PERCEIVED IMPACTS

The Development Application seeks consent for a modest enlargement of the front balcony, a light awning over and modification to the associated openings at the front; alterations and additions to the existing Loft including side dormers and the conversion of the front and rear hipped rooves to 'Dutch' gables with glazing to inset balconies. A minor flat awning is proposed over the existing rear stair landing, an accessible lift is proposed within the minor modifications proposed to the existing side bay and the existing garage door is proposed to be made 560mm wider for ease of use.

The additional main front balcony area proposed comprises 6.7m². The balcony form will remain as painted weatherboard, historically appropriate for this period of building, but with a lower balustrade to allow seated views over to the ocean with a glazed upper section. Structure will remain in situ. A single suite of adjacent doors are proposed where there is an iconic view to Cabbage Tree Bay and North East over the ocean. A light-weight awning is proposed to provide protection over the doors and a portion of the balcony and vertical louvres to the side to provide a degree of privacy. The existing conditions are largely the same and there are no associated impacts (the louvres will improve privacy).

The alterations and additions to the existing Loft have been carefully composed to maximise the utility and quality of the existing Loft and location, given views to the front over Cabbage Tree Bay and the ocean, unencumbered solar access to the North and a private outlook to the rear garden with established landscaping. There are views to the Cathedral to the South East and given the consistent front and rear setbacks with the property to the south and inset Loft, the sightline has no impact to private open spaces. Operable screening is proposed to the northern and southern side of the dormers to enhance privacy and provide passive solar control and thermal performance of the apartment. The side dormers are inset 4.2m from the southern boundary and low frequency spaces such as a robe are located to the South West. The gable ends to the front and rear create a 'screen' along their sides over a meter long further increasing privacy and preventing overlooking. The rear balcony is a Juliet balcony in size suitable for personal use only and is associated with a low occupancy space (bedroom) – the outlook will be only to the rear landscaped garden and capture afternoon sun; there are no real privacy issues due to the side 'screening' and small size. Being a bedroom curtains / shutters will naturally provide further privacy and screening the rear gable end glazing; the established landscaped setting on building offset alignments essentially mitigate overlooking or privacy issues regardless. There is low head height to the sides of the gable roof, and similar to the effect of perimeter planting to the front balcony, occupation will be centred and inset from the building edges effectively creating greater privacy and reducing any perceived impact from the modifications. The balcony edges need to meet the specific roof height for the balustrade formation; the front balcony has appropriate useable but modest size, being tempered and inset by the perimeter planting. A small, slim awning is proposed for thermal and building performance over the front and rear glazing.

An accessible lift to Unit 3 with a rise in floor of 2 is proposed to be discretely integrated into the existing bay to the South West. The bay will retain the existing nature and character; maintaining the same roof level and side & rear setback and remain clad in weatherboard with glazing to the east along the side passage. It remains a small secondary entry vestibule. There are no environmental issues associated with this addition and modification.

There are further very minor works comprising;

- a low profile integrated awning over the landing to the rear stair – the works are very minor and have no associated impact.
- An increase of garage door width to Unit 3 for improved functionality. The material and nature of the façade will remain unchanged - the works are very minor and have no associated impact.

Appropriate setbacks are retained from the street and side boundaries. The works have considered their integration and appropriate composition with regard to the existing building, potential impacts and the relationship to the local precinct. It is considered that there are no unreasonable environmental impacts associated with the proposed works and they are consistent in this locality.

4.0 STATUTORY CONTROLS

The provisions of Section 79C of the Environmental Planning and Assessment Act, 1979 (as amended) determine the matters for consideration in assessing a development application as stated below:

- (a) the provisions of:

- (i) any environmental planning instrument, and
- (ii) any draft environmental planning instrument that is or has been placed on public exhibition and details of which have been notified to the consent authority (unless the Director General has notified the consent authority that the making of the draft instrument has been deferred indefinitely or has not been approved, and
- (iii) any development control plan, and
- (iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and
- (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), that apply to the land to which the development application relates,
- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,
- (c) the suitability of the site for the development,
- (d) any submissions made in accordance with this Act or the regulations,
- (e) the public interest.

The relevant instruments for consideration in assessment of the application are listed in the introduction. The relevant matters identified above are addressed below:

4.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT, 1979

The proposal seeks development approval from Northern Beaches Council with authority granted under this act.

4.2 SEPP 55

There are no issues arising from the site as the land has always been residential with no history of industry in the vicinity

4.3 SEPP 65

SEPP 65 is not applicable. The building does not constitute a 'residential flat building' with less than 4 apartments and the works and the works

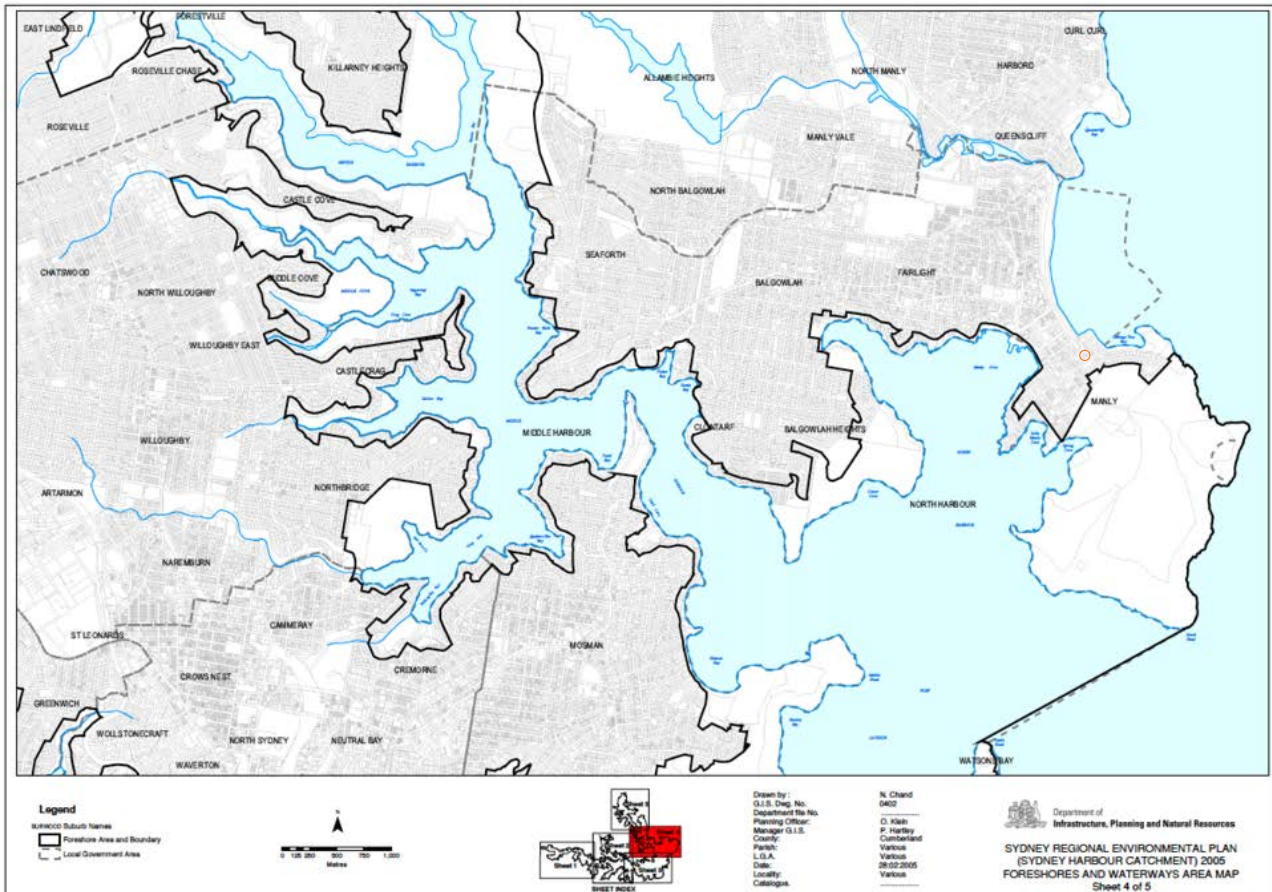
- a) do not constitute a new flat building
- b) the works do not involve a complete building upgrade
- c) the works do not involve the conversion of a non residential building into a residential building

4.4 SEPP (Basix)

A Basix Certificate accompanies this application, with commitments attached to the plans.

4.5 SREP (SYDEY HARBOUR CATCHMENT)

There are no issues arising from the site as the land is not within the catchment area.



Site depicted with orange circle outside of harbour catchment area

4.6 MANLY LOCAL ENVIRONMENT PLAN 2013

2.1 **Land use zones:** the site is zoned 'R1 General Residential'

2.3 **Zone objectives:**

- To provide for the housing needs of the community.
- To provide for a variety of housing types and densities.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.

The stated objectives provide for and facilitate a zone with varied residential densities and the proposal seeks improvements to the existing built form that enhances the amenity and day to day needs of the resident. This proposal meets this stated objective, and are of a minor nature that essentially preserves the existing built form and fabric.

4.1 **Minimum lot size:**

Not applicable – no variation

4.3 **Building height:**

No variation – the existing ridge height remains.

The existing building is circa 1920 and has a height of 11.35m at the highest point. This height is consistent with the street, which predominantly contains low rise multi-residential dwellings of 3 – 4 storeys with an adjacent tower of 9 storeys and

interspersed housing of typically 2-3 storeys. The proposed alterations and additions to the Loft, whilst not modifying the building height, are in part above the current 8.5m height limit. Concession is given to sloping sites such as this with a fall of 4.6m from rear to the street, however the works pose limited impact by virtue of largely being within the existing building envelope and essentially an improvement and refinement of the spaces.

A Clause 4.6 Submission accompanies this Development Application, as noted below.

4.4 Floor space ratio:

The overall floor area of Unit 3 is reduced with this proposal from 312m² to 298m². The Loft area of 91m² is modified for improved amenity, including stairs, voids and external area. The loft area is reduced by 14m² to 77m². However, the approved Attic is currently not calculated in FSR; the proposal effectively increases FSR to 0.76:1*. The existing building from Circa 1920 has an original FSR of 0.65:1*, which is above the current designation of 0.6:1 for the precinct.

The built form is commensuration with the street, substantially smaller than the adjacent 9 storey tower, and clearly contains less FSR than similar period apartments in the street. The building has significant landscaped area and large building separation facilitating privacy, solar access, landscaping and view corridors; all intents of an FSR control. The objectives of the FSR control are satisfied.

The proposed works are largely contained within the existing building envelope, ostensibly with the existing Attic area of unit 3. The proposed works thus have limited environmental impact and represent a sensible and appropriate design approach to the proposed building improvements. The works have been appropriately designed as noted below in Section 4.7, and the FSR variation presents limited actual variation to the building envelope. It is noted FSR is one of a number of controls with the objective of providing desired building envelope controls; the proposal has limited variation to the existing site conditions, streetscape or building envelope by virtue of essentially being within the existing envelope and importantly with negligible impact.

A Clause 4.6 Submission accompanies this Development Application as noted below due the proposed works and existing building containing a higher FSR than current controls.

(* FSR of whole building not measured; anticipate value provided)

4.6 Exceptions to development standards

A Clause 4.6 submission accompanies this Development Application for FSR and HOB, noting the existing building Circa 1920 exceeds the current prescribed measures.

5.10 Heritage and conservation

The house at 32 Reddall Street, Logan Brae, is listed as an item of Local Significance as are the street trees in Addison Street from Bruce Ave to Reddall Street. Neither of these items are read in conjunction with this property and the works will have no relevance, reference, or impact to these items.

5.11 Bushfire hazard reduction

The building is not in a bushfire prone area or in an area where acid sulphate soils or landslip is of concern.

6.1 Acid sulfate soil

The site is class 5 but as the works are essentially internal with no proposed excavation in excess of 1m; thus this clause is not applicable.

6.2 Earthworks

The only aspect of external work relates to the lift structure, which will likely consist of a slab on ground with thickened edge and only cover an area of 1.9m². The slab will replace the existing concrete path and have no variation to landscape area or groundwater. The works will not require geo-technical investigation and will be less than 1m deep.

6.4 Stormwater management

Not applicable – no variation

6.5 Terrestrial biodiversity

The site is within the mapped area frequented by long nose bandicoots, but the minor work is essentially limited to the existing building fabric and elevated above ground level; there is no impact.

6.6 Riparian land and watercourses

Not applicable.

6.7 Wetlands

Not applicable.

6.8 Landslide risk

Not applicable.

6.9 Foreshore scenic protection area

- (1) *The objective of this clause is to protect visual aesthetic amenity and views to and from Sydney Harbour, the Pacific Ocean and the foreshore in Manly.*
- (2) *This clause applies to land that is shown as "Foreshore Scenic Protection Area" on the Foreshore Scenic Protection Area Map.*
- (3) *Development consent must not be granted to development on land to which this clause applies unless the consent authority has considered the following matters:*
 - (a) *impacts that are of detriment to the visual amenity of harbour or coastal foreshore, including overshadowing of the foreshore and any loss of views from a public place to the foreshore,*
 - (b) *measures to protect and improve scenic qualities of the coastline,*
 - (c) *suitability of development given its type, location and design and its relationship with and impact on the foreshore,*
 - (d) *measures to reduce the potential for conflict between land-based and water-based coastal activities.*

Not applicable - the proposal is inconsequential to this clause, it is appropriate and there is no detrimental impact perceived or view corridors impeded.

6.11 Active street frontages:

The site is not designated as having an active street frontage. The works retain and improve passive surveillance of the street, but are recessed beyond sight lines when standing in front of the building.

6.12 Essential services

Not applicable; all required services are existing

6.13 Design excellence

The works significantly enhance the amenity of the apartment whilst retaining the nature and form of the existing building with considered integration. The amenity is also significantly improved with a safe accessible lift proposed, which is discretely integrated into the existing side bay. The balconies will provide greater utility and amenity whilst maintaining an appropriate synthesis with the existing fabric, affording improved views, improved weather protection, safety, access, light, ventilation and passive performance without any real associated impact. The proposed works are designed as a secondary layer to retain the form of the building, employing light and minimal structure and retaining cantilevered projections and inset elements to minimise perceived bulk. The approach and form represent a sensitive and considered design; a hallmark of design excellence.

4.7 MANLY DEVELOPMENT CONTROL PLAN 2013

3.1 Streetscape and Townscape

The objectives are all satisfied with this proposal which sensitively modifies the existing structure; the balcony modification and light weight awning remain visible from the street at front of the building but remain setback from the street and side boundaries and retain the appropriate painted timber weatherboard lining that is appropriate for the period building. The Loft street oriented inset balcony, not readily visible from the street, will provide a further layer of passive surveillance, which is retained and amenity enhanced with no impacts.

The garage and car space for Unit 1 are retained and the minor increase to the garage door width retains the same façade.

The roof form remains essentially the same with the ridge remaining in situ and Dutch gables are formed to the front and rear hips of the main roof. The lower front roof remains in situ as a layered roof composition and contains an inset balcony with no overt projections above the roof – visually the building retains its existing character in line with the intent of the DCP.

Roofing material remains as existing, other than the dormers with low profile metal rooves consistent with existing projections; the finish will be non reflective. There is no associated view loss; view corridors remain.

The dormer rooves are set lower and subservient to the existing ridge line, they have low profile metal roofing with matching guttering and eaves with weatherboard lining, consistent with the building and are set in from the building sides in a proportionally appropriate scale. There exists precedent for similar glazed gables, Dutch gables and inset dormers in this Fairy Bower precinct; the period dwellings lend themselves to creating habitable roof spaces rather than additional levels and there are iconic views to Fairy Bower and Shelly Beach to the north.

3.2 Heritage Consideration

Refer to the LEP; there is no relevance associated with the minor works retaining the existing height and building footprint.

3.3 Landscaping

This remains unaffected.

3.4 Amenity

The amenity will be significantly enhanced with the proposed works, enabling a little more space on the ocean facing balconies, weather protection, improved functionality of the apartment and improved accessibility with the proposed lift. The increased width to the garage door of Unit 1 will also improve ease of use and resultant amenity, and the overall passive performance of the apartment will be greatly improved.

3.5 Sustainability

Timber be sourced from sustainable sources with existing material recycled where possible.

3.6 Access

The unit is proposed to have an accessible lift to enhance utility, equity and safety.

3.7 Stormwater

This remains unaffected with this application; there is no additional footprint or impervious area.

3.8 Waste Management

A waste management plan accompanies this submission and appropriate bin storage space exists on site. The works do not vary any aspect of this requirement.

3.9 Mechanical Plant Equipment

n/a

3.10 Safety and security

The proposed works maintain passive surveillance in line with the objectives of this section; the works do not involve any other relevant components.

4.1 Residential development controls

As noted above, the zone is D3, though the building pre-dates the controls. The building originally contained 4 units but only contains 3 now; this remains unchanged and is appropriate.

- | | |
|----------------------------|---|
| 4.1.1 Residential Density: | this remains unchanged; density is appropriate. |
| 4.1.2 Height of Buildings: | this remains unchanged; all works remain under the current height. |
| 4.1.2.1 Wall Height: | this remains unchanged; the maximum existing wall height is 8.3m with an average of 7.1m at the middle of the ridge line; this is the DCP recommended height for land such as this with a 1:10 slope. This demonstrates the existing building is of commensurate scale with the desired controls and nature of the precinct, even through it is clear there are a few larger developments including the 30+m high building adjacent. The only work to the walls relate to the modifications to the existing side bay to incorporate an accessible lift; all work satisfies the control being a maximum of 6.17m |

- 4.1.2.2 Number of storeys: this remains unchanged; the building remains 3 stories (there are 2 partial levels – a partial lower ground level with garages at the street edge and Loft area centrally located within the building)
- 4.1.2.3 Roof Height: this remains unchanged; the height remains 11.35m
- 4.1.3 FSR: Unit 3 has a GFA of 221m² contained on the first floor of the building and in addition contains an approved attic (BC0009 2017) with a GFA of 91m²; 312m² inclusive. The proposal entails the reconfiguration and utilisation of 77m² of attic space and utilisation of 221m² of level 1.

The proposed GFA of Unit 3 (excluding the existing attic) is calculated as 298m², resulting in an FSR of 0.76:1*.

When calculating the existing FSR* with the inclusion of the existing approved attic the FSR is actually larger at 0.78:1. The composition of the FSR is of paramount importance; as the effect of the FSR is relatively minor by virtue of the floor area existing, but not calculated, and largely contained within the existing building envelope involving limited variation to bulk, scale and variation to the existing structure.

The FSR is thus appropriate and consistent with the existing building form and streetscape, which contains significantly larger developments. As noted above, the proposed FSR is calculated at 0.76:1. There is negligible associated impact as demonstrated in the architectural plans and the building retains its existing character and underlying form with no change to setbacks and building separation, landscape area or building height.

The FSR and proposed alterations and additions are aligned with the objectives of building envelope controls and the form, character and composition of the design are deemed appropriate, consistent in the precinct and in the public interest being a sensitive, sustainable and appropriate improvement to an existing building with a view to minimising any associated impact.

- 4.1.4.1 Front Setback: (* FSR of whole building not measured; anticipate value provided)
this remains unchanged; the setback to the building remains as 5.8m; the balcony to Unit 3 is proposed to have a slightly reduced setback to the street of 3.6m from 3.96m. This is consistent with the street with buildings, garages and other structure on the boundary. The proposed setback modification essentially retains a very similar façade to the existing and the improvements have no impact, but afford significantly greater amenity. The minor modifications are permissible being unenclosed balconies.
- 4.1.4.2 Side Setback: this remains unchanged; the balcony matches the existing side building lines – 1193mm to the North West and 2432 to the South East. The loft dormer are inset 3m from the North West and 4.2m to the South East.
- 4.1.4.4 Rear Setback: this remains unchanged; compliant at 21.3m
- 4.1.5 Open Space & Landscape: this is increased as too amenity; Open Space is increased by 27m², it remains compliant with more than 55% open space (OS3) with > being landscaped area. The landscape is not affected with this proposal – there are > 3 endemic species
- 4.1.5.3 Private Open Space: the proposal adds 27m² of private open space; this unit (and each unit) readily satisfies the control
- 4.1.6 Parking: this remains unchanged; there are 2 garages and a carpark apron across the front setback
- 4.1.7 First Floor & Roof Additions: the proposed works satisfy the intent and approach of this clause – the building is circa 1920 and the proposed works to the first floor and roof appropriately retain the fundamental character of the building and present as a secondary layer and the proposed works do not have associated

		environmental impact. There is no variation to the ridgeline or roof height; the existing building is taller than the current height control. There is an existing Attic of 71m ² that is proposed to be modified and will retain a similar floor area of 77m ² . The clause allows for such alterations and additions given the existing conditions and appropriate design of the proposed works containing negligible environmental impact.
4.1.8	Sloping Sites:	this remains unchanged
4.1.9	Swimming pools & spas:	n/a
4.1.10	Fencing:	this remains unchanged
4.4.1	Demolition:	as noted above, balcony modifications and Loft modifications will reuse suitable material
4.4.2	Alterations & additions:	the works constitute relatively minor alterations & additions; the approach is consistent with the preservation and adaption approach
4.4.3	Signage:	n/a
4.4.4	Awnings:	n/a (relates to street awnings)
4.4.4	Earthworks:	n/a; the lift footing will be very minor and <1m – no pit is required. The existing site conditions remain.

5.0 CONCLUSION

The proposed works are well considered; they fundamentally improve the amenity of the apartment and contain negligible real impact to any neighbouring property. The proposed works retain the character of the building and streetscape, they are in accordance with Council’s planning policies and development strategies that attempt to provide for families, the elderly and those requiring accessible access and high quality built outcomes - the works are essentially a significant improvement of the existing built form and deemed appropriate for development consent.