

Statement of Environmental Effects

Alterations and Additions
to the rear of 2x two storey semi-detached dwellings

**18-20 Denison Street
Manly NSW
Northern Beaches Council**

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1.0 Introduction

This statement of environmental effects is submitted on behalf of Adam and Sabine Moore, and Ian and Rhondah Mckellar to Northern Beaches Council in support of a development application for 18-20 Denison Street, Manly.

The DA seeks approval pursuant to Section 80(1) of the Environmental Planning and Assessment Act, 1979 for the following:

No 18 Denison Street;

- New bathroom and extension to the living room to the eastern side of the ground floor.
- New Ensuite to master bedroom to the eastern side of the first floor.
- 3x new skylights rear of the dwelling.

No 20 Denison Street;

- New bathroom to western side of the ground floor.

Both dwellings will also need to relocate the existing air conditioning units from the new layout and configuration.

The reason for the works is to provide a more usable layout to each dwelling.

Currently there is no bathroom to the ground floor of each dwelling, thus to use the bathroom the occupants need to travel upstairs.

Also, the living space to the rear of each dwelling is rather small, with a dead external space to the side of each dwellings. No 20 has thus taken this as an opportunity to extend the side of the rear living area to the ground floor and also build a walk-in robe to the first-floor bedroom.

Application for the Construction Certificate will be sought separately.

This planning report has been prepared by Brad Inwood Architects, based on the plans and information supplied as part of this application. The application has been prepared on behalf of the landowners.

This report should be read in conjunction with the supporting information and architectural drawings included as appendices to the report.

2.0 Project Team

The preparation of the DA has been a collaborative effort by a team of consultants as specified below.

Project Team	
Architectural	Action Plans
Town Planning	Brad Inwood Architects and Planners
Surveyor	TSS Total Survey Solutions

Brad Inwood the principal of Brad Inwood Architects, is registered as an Architect in NSW and enrolled in the Division of Chartered Architects in the register of Architects pursuant to the Architects Act 1921, with a registration number of 7108.

Brad Inwood has the following qualifications:

- Bachelor of Architecture – UNSW, 1995
- Bachelor of Urban Development & Design – UNE, 1998

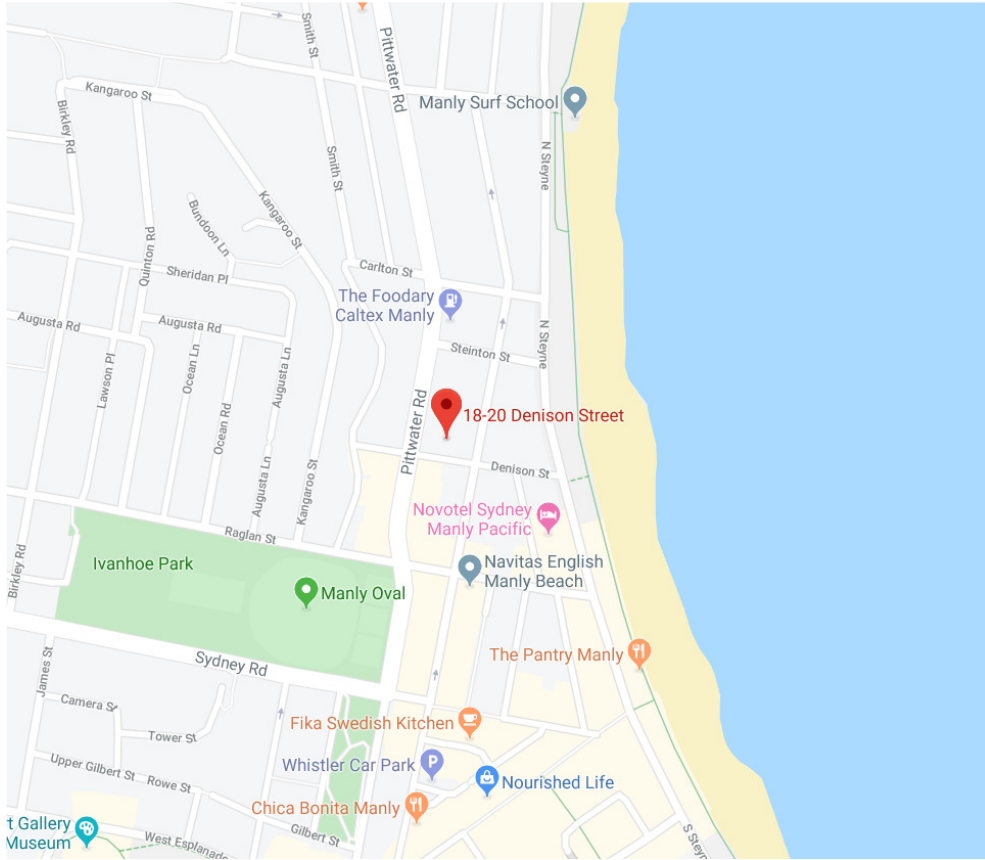
3.0 Site Description

The site is located on the northern side of Denison Street, Manly, in the Council area of Northern Beaches.

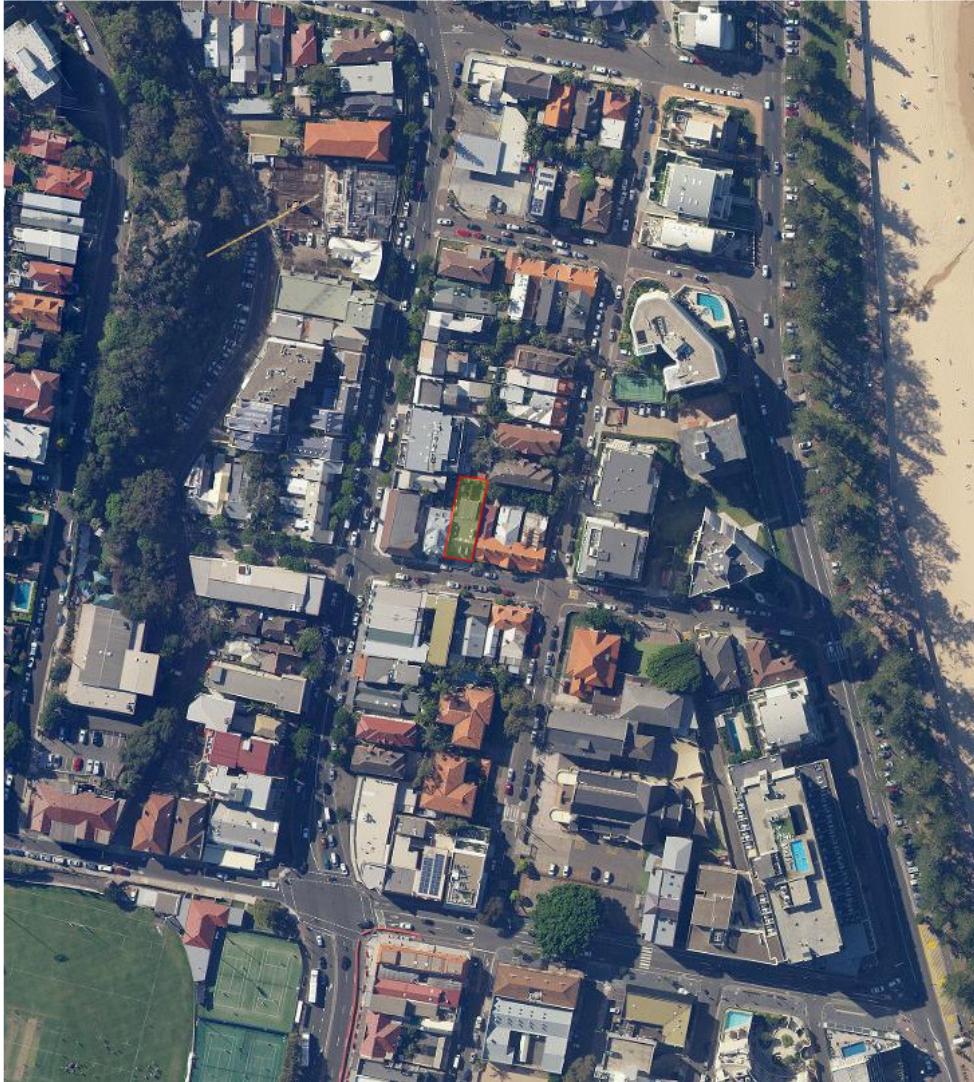
The site is technically known as SP 85482 and has an area of 331.4m².

The site is rectangular with a frontage along Denison Street of 10.69m.

The site has no fall in either it's long or cross section.



18-20 Denison Street



18-20 Denison Street

4.0 Existing Development

Currently to the site are 2x two storey residential townhouses, each with 3 bedrooms.

The layout is generally the same internally, although there is some variation to the front of each dwelling for front facade variation.

Both dwellings have single car garage facing Denison Street.

No 18 has its front door to the eastern side of the dwelling, while No 20 has its front door to the front façade.

Both buildings are painted and rendered walling, with a metal roof and powder coated aluminium windows.

The building was constructed around 2010, with the strata subdivision undertaken around the same time.

5.0 Surrounding Development

The area is surrounded by a mix of older styled homes, starting from around 1900, to modern terraces and townhouses, apartments and commercial premises with shop top housing.

8-16 Denison Street

To the east of the site (No 8-16 Denison Street) is a row of federation styled single storey villas, most likely constructed around 1900 and are constructed of face brick walling and terracotta roof tiles.

22 Denison Street

To the west of the site (No 22 Denison Street) is 3x storey semi-detached development, constructed of painted and rendered walling with a metal roof.

There is a shared garage to the dwellings to the front of the allotment.

This building was constructed around 2017-18.

19 Denison Street

To the south of the site (19 Denison Street) is a two-storey brick building that is currently used for residential accommodation but was formally used for commercial/warehouse usage.

6.0 Images



Denison Street looking east



Denison Street looking west



18-20 Denison Street



Eastern side of 18 Denison Street



16 Denison Street



22 Denison Street



19 Denison Street

7.0 Relevant Instruments and Planning Controls

This section of the SEE outlines the environmental planning framework applicable to the proposal, including State Environmental Planning Policies, Local Environmental Plans and the like.

Legislation

- The Environmental Planning & Assessment Act, 1979 (as amended) (EPA Act).

State Environmental Planning Policies or Deemed Policies

- SEPP (Building Sustainability Index: Basix) 2004.
- SEPP (Exempt and Complying Development Codes) 2008
- SEPP (Affordable Rental Housing) 2009
- SEPP No. 19 - Bushland in Urban Areas
- SEPP No. 21 - Caravan Parks
- SEPP No. 32 - Urban Consolidation (Redevelopment of Urban Land
- SEPP No. 33 - Hazardous and Offensive Development
- SEPP No. 39 - Spit Island Bird Habitat
- SEPP No. 50 - Canal Estates
- SEPP No. 55 - Remediation of Land
- SEPP No. 62- Sustainable Aquaculture
- SEPP No. 64 -Advertising and Signage
- SEPP No. 65 - Design Quality of Residential Flat Development.
- SEPP (Housing for Seniors or People with a Disability) 2004
- State Environmental Planning Policy Kurnell Peninsula
- SEPP (Major Development) 2005
- SEPP (Mining, Petroleum Production and Extractive Industries) 2007
- SEPP (Infrastructure) 2007

Local Environmental Plans

- Manly Local Environmental Plan 2013

Development Control Plans

- Manly Development Control Plan 2013

8.0 State Environmental Planning Policies or Deemed Policies

Legislation

a) The Environmental Planning & Assessment Act, 1979 (as amended) (EPA Act)

The EPA Act provides the overarching framework against which most proposed developments are assessed. This SEE provides an assessment of the proposed development against the relevant framework, as triggered by the EPA Act, in particular Section 79C.

In particular, relevant environmental planning instruments, development control plans, as well as the proposal's environmental impacts, are addressed below.

State Environmental Planning Policies or Deemed Policies

a) SEPP (Building Sustainability Index: Basix) 2004

The BASIX SEPP seeks to contribute to environmentally sustainable design for new residential developments. DAs involving most residential development are required to be accompanied by a 'BASIX certificate'. Such certificates itemise a range of water and energy saving measures which are required to be implemented in the development in order to lessen the demand on natural resources.

A BASIX certificate is included in the DA.

b) SEPP (Exempt and Complying Development Codes) 2008

Not applicable to this development.

c) SEPP (Affordable Rental Housing) 2009

Not applicable to this development.

d) SEPP No. 19 - Bushland in Urban Areas

Not applicable to this development.

e) SEPP No. 21 - Caravan Parks

Not applicable to this development.

f) SEPP No. 32 - Urban Consolidation (Redevelopment of Urban Land)

Not applicable to this development.

g) SEPP No. 33 - Hazardous and Offensive Development

Not applicable to this development.

h) SEPP No. 39 - Spit Island Bird Habitat

Not applicable to this development.

i) SEPP No. 50 - Canal Estates

Not applicable to this development.

j) SEPP No. 55 - Remediation of Land

Not applicable to this development.

k) SEPP No. 62- Sustainable Aquaculture

Not applicable to this development.

l) SEPP No. 64 -Advertising and Signage

Not applicable to this development.

m) SEPP No. 65 - Design Quality of Residential Flat Development.

Not applicable to this development.

n) SEPP (Housing for Seniors or People with a Disability) 2004: (Does not apply to land to which State Environmental Planning Policy Kurnell Peninsula) 1989 applies)

Not applicable to this development.

o) SEPP (Major Development) 2005

Not applicable to this development.

p) SEPP (Mining, Petroleum Production and Extractive Industries) 2007

Not applicable to this development.

q) SEPP (Infrastructure) 2007

Not applicable to this development.

Local Environmental Plans

Manly Local Environmental Plan 2013

9.0 Site Suitability

Having regard to the characteristics of the site and its location, the proposed residential development is considered appropriate in that:

- The site is zoned to accommodate the present dwellings and proposed alterations and additions.
- The size and dimensions of the site are appropriate for the accommodation of the proposal.
- The proposal substantially complies with the regulations and codes of Manly Council's LEP and DCP for the type and scale of the surrounding development.
- The proposed development will not result in any substantial adverse environmental impacts to adjoining properties and the surrounding public domain, particularly in relation to overshadowing, views, privacy, overlooking and access to daylight and natural ventilation.
- It will have positive social and economic benefits to the area and local vicinity.
- The site is fully serviced to accommodate the proposed works.
- The proposal will not result in any adverse traffic impacts.
- The proposed works do not change the front façade of the dwellings.
- The works do not result in changes that would affect the Conservation Area value of the dwellings, and the near vicinity, which the building is founded in.
- The scale, height and form of the development are consistent with the adjoining properties and streetscape.
- The proposed use, density and scale of the development are appropriate given the site's location and the context of the surrounding environment.

Furthermore, as detailed throughout this statement of environmental effects, the proposed development will not result in any adverse environmental impacts and it is therefore considered that the site is suitable for the proposed development.

10.0 Permissible Development

The land is zone R3 (medium density residential) as per the Manly LEP 2013, and the proposed works are permissible in this zone.

1 Objectives of zone

- To provide for the housing needs of the community within a medium density residential environment.
- To provide a variety of housing types within a medium density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To encourage the revitalisation of residential areas by rehabilitation and suitable redevelopment.
- To encourage the provision and retention of tourist accommodation that enhances the role of Manly as an international tourist destination.

2 Permitted without consent

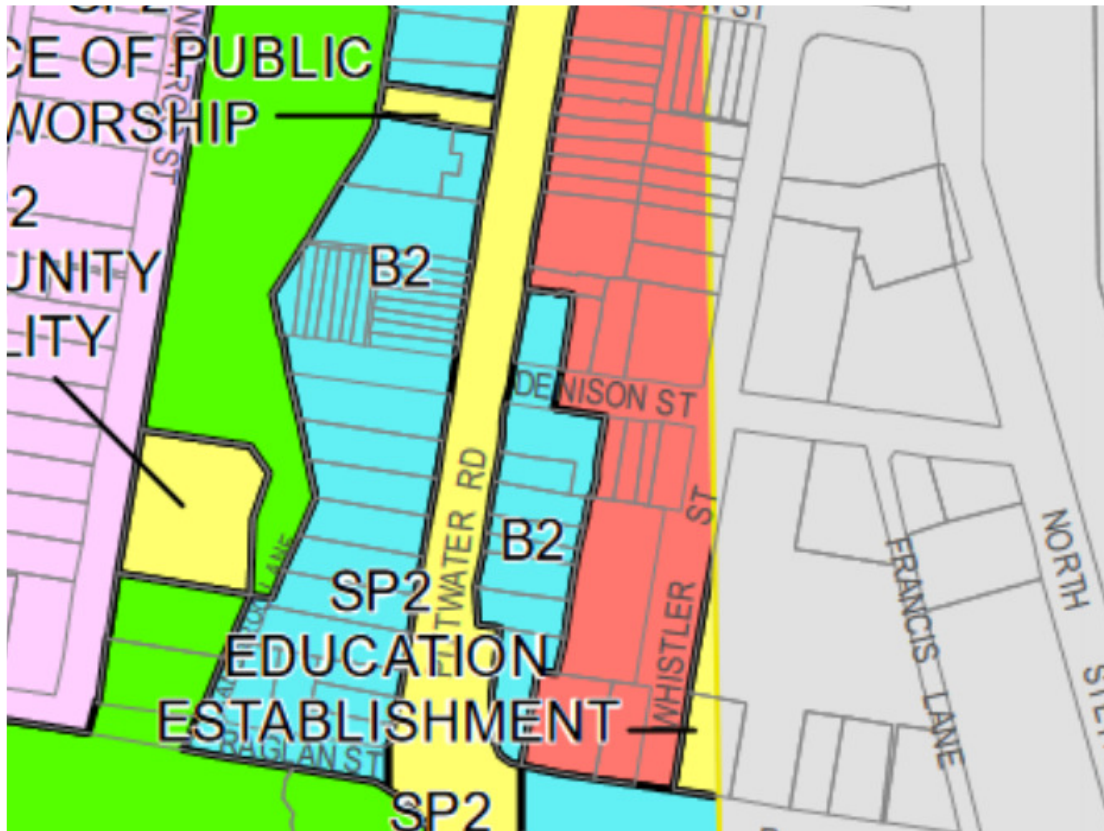
Home-based childcare; Home occupations

3 Permitted with consent

Attached dwellings; Boarding houses; Boat sheds; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Emergency services facilities; Environmental protection works; Flood mitigation works; Group homes; Home businesses; Home industries; Hostels; Information and education facilities; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Recreation areas; Recreation facilities (indoor); Residential flat buildings; Respite day care centres; Restaurants or cafes; Roads; Secondary dwellings; Semi-detached dwellings; Seniors housing; Service stations; Shop top housing; Signage; Take away food and drink premises; Tank-based aquaculture; Tourist and visitor accommodation; Water recycling facilities; Water supply systems

4 Prohibited

Advertising structures; Farm stay accommodation; Pond-based aquaculture Water treatment facilities; Any other development not specified in item 2 or 3



Zoning Manly LEP 2013

11.0 Aboriginal and European Heritage

There is no know aboriginal or European heritage to the site.

12.0 Bush Fire Risk

The works are not in a bush fire zone as per the Manly LEP 2013.

13.0 Flooding

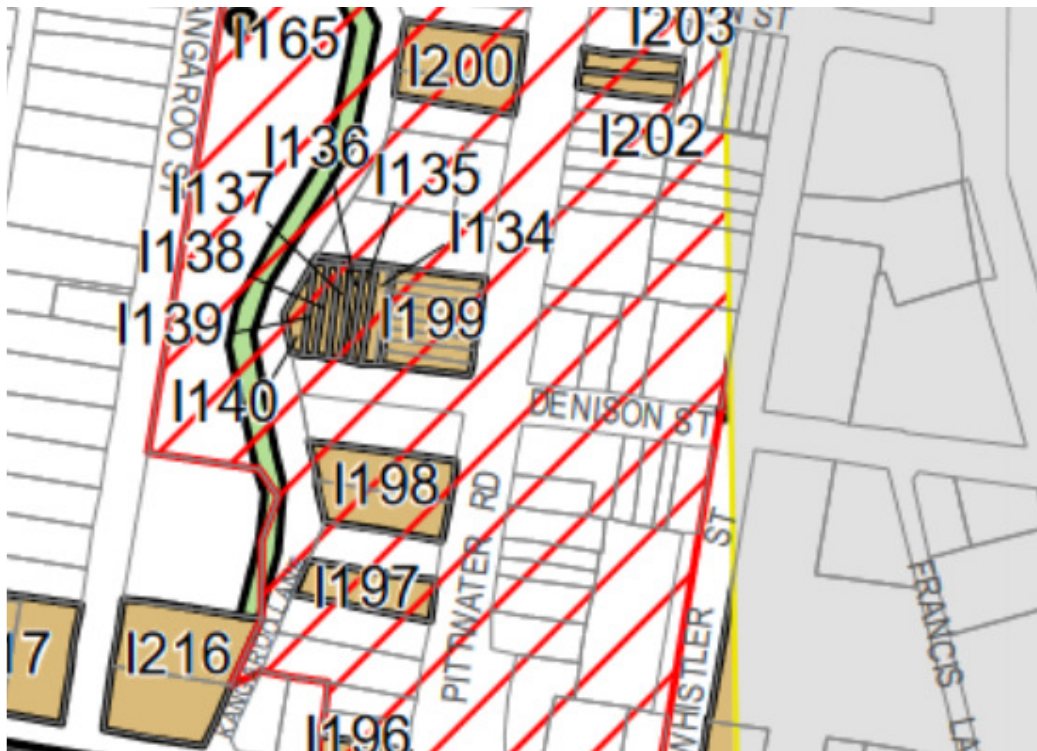
The works are not in a flood zone as per the Manly LEP 2013.

14.0 Heritage

The building is not heritage listed.

The site is in a heritage conservation zone, as per the Manly LEP 2013.

A heritage impact statement is submitted with the application.

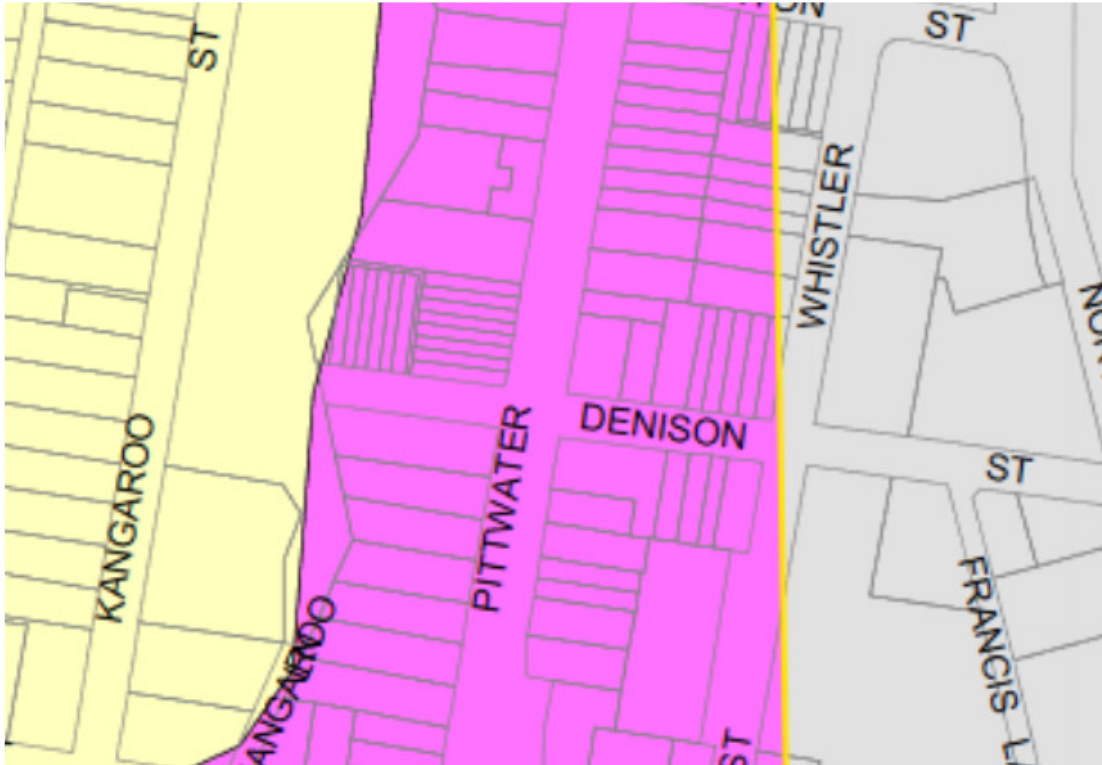


Conservation Area Manly LEP 2013

15.0 Acid Sulphate Soils

The site is located in a Class 4 acid sulfate soil area.

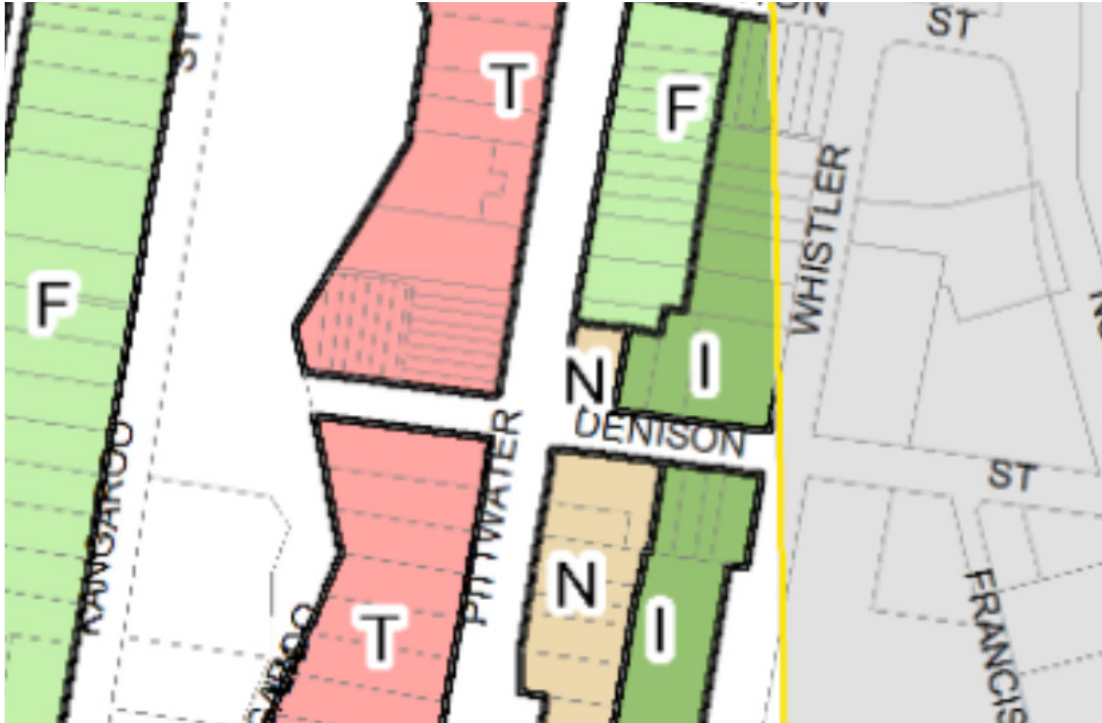
As the works involve no excavation, and are of a negligible size, there is no acid sulfate risk to the site.



Acid Sulfate Soils Marilyn LEP 2013

16.0 FSR

The permissible FSR for the site is 0.75:1 as per the Manly LEP 2013.



FSR Manly LEP 2013

The breakdown of both dwellings is as follows;

Area of site	331.4m²
Permissible FSR to the Site under Manly LEP 2013	0.75:1
Existing floor area to No 18	110.04m²
Existing floor area to No 20	117.88m²
Existing total area to both dwellings	227.92m²
Existing FSR	0.71:1
Existing compliance with the LEP for FSR	Yes
Proposed floor area to No 18	121.04m²
Proposed floor area to No 20	120.99m²
Proposed total area to both dwellings	242.03m²
Proposed FSR	0.74:1
Proposed compliance with the LEP for FSR	Yes

The proposed works therefore still comply with the FSR controls as per the Manly LEP 2013.

17.0 Height

The permissible height under the Manly LEP 2013 for the site is 11m.

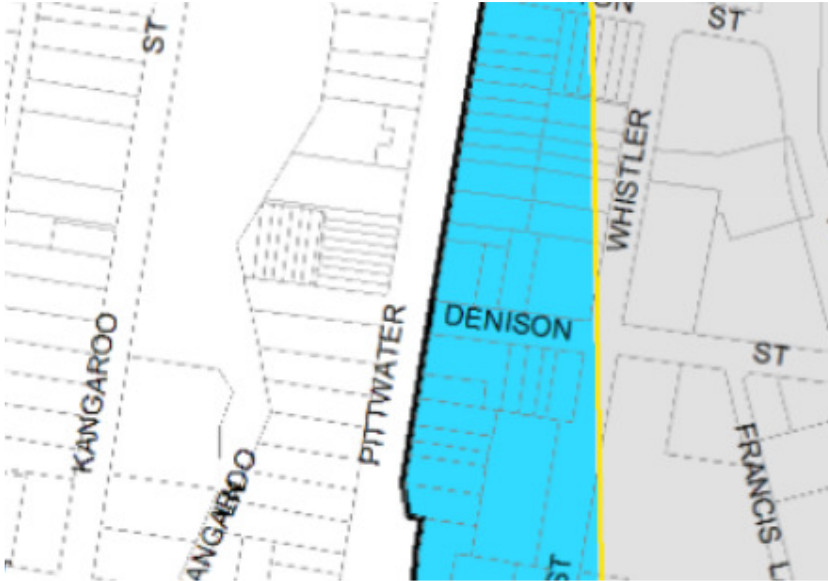


Height Manly LEP 2013

The existing dwellings and the proposed works have a maximum height of 7.4m and comply with the maximum height of 11m.

18.0 Foreshore Scenic Protection Zone

The building is in a foreshore scenic protection zone.



Foreshore Scenic Protection Zone Manly LEP 2013

The objective of the foreshore scenic protection zone is as follows;

- (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*

The proposed works result in no impact to the foreshore scenic protection zone in that;

- The works are not visible from the foreshore or water's edge.
- There is no loss of visual amenity of harbour or coastal views from the proposed works.
- There is no loss of public amenity, including shadowing from the proposed works.
- The coastline is not affected from the proposed works.
- There is no conflict between land based and water-based activities from the proposed works.

As such, there is no impact to the foreshore protection zone from the proposed works, and the dwellings achieve the objectives of the Manly LEP 2013.

19.0 Active Street Frontage

The site is not part of any active street frontage requirement in the Manly LEP 2013.

20.0 Key Sites

The site is not part of any key site requirement in the Manly LEP 2013.

21.0 Terrestrial Biodiversity

The site is not located in any terrestrial diversity, wetlands of watercourse map as per the Manly LEP 2013.

22.0 Tree Preservation

No trees or substantial planting is removed from the proposed works.

Trees nominated for protection must be enclosed within a 1.8m high protection fence that

23.0 Topographical Disturbance

There is negligible topographical disturbance from the proposed works, with minor site levelling to suit the new footings and slab for the ground floor works.

24.0 Stormwater Collection

The existing stormwater collection system would be able to be adjusted so to collect and discharge water from the minor increase in hardscape area from the proposed works.

Additional guttering and downpipes will be installed where required, which will then connect to the existing stormwater drainage system to the site.

25.0 Sediment Controls

Minor sediment controls will need to be implemented during construction.

Refer to the sediment erosion plan for further details.

26.0 Airport Noise

The site does not suffer from airport noise disturbance.

27.0 Building Design and Appearance

The proposed works satisfy the building design requirements with the use of the following

- Masonry walling of face brick to relate to the existing building and the adjoining brick buildings.
- Powder coated aluminium windows which are used extensively in the near vicinity.
- Roof form to be a continuation of the existing roof form, thus the new works can relate to the existing building.

28.0 Front and Side Fencing

There is no change to the front fence design and the side fencing from the proposed works.

29.0 Letterboxes and Street Address

There is no change to the letterboxes and street address from the proposed works.

30.0 Bin Storage and Waste/Recycling

There is no change to the bin storage and recycling capacity of the site from the proposed works.

31.0 Streetscape

As the works are located to the rear of the site, there is no change to the streetscape and presentation of the building along Denison Street from the proposed works.

32.0 Total Open Space

As per the Manly DCP 2013, the site is located in OS2 residential area, 50% of the site is required to be classified as total open space.

Total open space is defined as;

Means that part of a site which is designed or designated to be used for active or passive recreation and includes:

- *Landscaped area (see LEP meaning);*
- *Open Space Above Ground as defined in this DCP;*
- *Hard paved areas (un-enclosed pedestrian walkways and access paths pergolas, clothes drying and barbeque areas);*
- *Swimming pools occupying less than 30 percent of total open space; and*
- *Private open space (including principal private open space) as defined in this DCP.*

but excludes:

- *any area for parking (including garages; carports; hardstands and vehicular access to that parking);*
- *out buildings (including sheds, cabanas, cubby houses and the like).*

The proposed total open space to the site is as follows;

Area of site	331.4m2
50% of site area required to be open space	165.7m2
Existing total open space to No 18	37.10m2
Existing total open space to No 20	37.65m2
Existing total open space	74.75m2
Existing % of total open space	22.55%
Proposed total open space to No 18	36.80m2
Proposed total open space to No 20	37.65m2 (unchanged)
Proposed total open space	74.45m2
Proposed % of total open space	22.46%
Compliance with the Manly DCP 2103 for total open space	No

Although the proposed works do not comply with the total open space as defined by the Manly DCP 2013, they do satisfy the objectives of the DCP for the purpose of having a total open space control.

The Manly DCP2013 for total open space and landscaping states;

Relevant DCP objectives to be met in relation to these paragraphs include the following:

- Objective 1)** *To retain and augment important landscape features and vegetation including remnant populations of native flora and fauna.*
- Objective 2)** *To maximise soft landscaped areas and open space at ground level, encourage appropriate tree planting and the maintenance of existing vegetation and bushland.*
- Objective 3)** *To maintain and enhance the amenity (including sunlight, privacy and views) of the site, the streetscape and the surrounding area.*
- Objective 4)** *To maximise water infiltration on-site with porous landscaped areas and surfaces and minimise stormwater runoff.*
- Objective 5)** *To minimise the spread of weeds and the degradation of private and public open space.*
- Objective 6)** *To maximise wildlife habitat and the potential for wildlife corridors.*

Minimum dimensions and areas for Total Open Space

- i)** *horizontal dimension of at least 3m in any direction; and*
- ii)** *a minimum unbroken area of 12sqm.*

A variation to the minimum specifications in i) and ii) above may only be considered for Above Ground Open Space where it can be demonstrated that lesser dimensions or areas will better serve to minimise amenity impacts on neighbours. A lesser areas of above ground open space may.

- iii)** *A variation to the minimum specifications in i) and ii) above may only be considered for Above Ground Open Space where it can be demonstrated that lesser dimensions or areas will better serve to minimise amenity impacts on neighbours. A lesser areas of above ground open space may be included or calculated under the*

minimum requirements in the circumstances of the case. In all other cases open space that does not comply with the minimum specification is not included or calculated under the minimum requirements for total open space

Although the proposed works do not comply with the total open space, they are appropriate in this circumstance in that;

- There is no loss of important landscape features or trees to the site from the proposed works.

Thus, the objectives of total open space are still achieved in this case.

- The site still can permit planting of trees are substantial planting to the rear of the existing open space area.

Thus, the objectives of total open space are still achieved in this case.

- The proposed works do not result in a loss of amenity (including sunlight, privacy and views) to the site, the streetscape and the surrounding area.

Thus, the objectives of total open space are still achieved in this case.

- The rear open space is still able to achieve sufficient water infiltration with porous landscaped areas and surfaces.

Thus, the objectives of total open space are still achieved in this case.

- The rear of the site still permits wildlife habitat and potential for wildlife corridors.

Thus, the objectives of total open space are still achieved in this case.

- The area of loss of total open space to the site is negligible. This is due to most of the proposed area of the new works being in part of the site which is less than 3m wide, therefore not effecting the total open space, as defined by the Manly DCP2013.
- The reduction in the total open space is negligible, with only 0.4m² of total open space being lost. This equates to a reduction in only 0.09%, which is an insignificant amount.
- All adjoining properties also would also not provide sufficient total open space to the site as defined by the Manly DCP 2013.

Every house and building in the near vicinity would not satisfy the 50% total open space requirements, including both adjoining properties.

Thus, it would be unfair and unreasonable for a control to be enforced on a site where the existing and established character of the area is inconsistent with that control.

Therefore, non-compliance with the total open space to the site with the proposed works are appropriate in this circumstance and are in keeping the character of the vicinity and the adjoining properties.

33.0 Landscaping and Landscaped Area

As per the Manly DCP 2013, the site is located in OS2 residential area, 30% of the site is required to be classified as landscaped area.

Landscaped area under the Manly DCP 2013 is defined as follows;

Landscaped area means a part of a site used for growing plants, grasses and trees, but does not include any building, structure or hard paved area.

As most of the new ground floor works are to be built over existing structures or hard paved areas, such as concrete and service areas, there is negligible loss of landscaping to the site from the proposed works.

The breakdown of both dwellings is as follows;

Area of site	331.4m²
30% of site area required to be landscape area	49.71m²
Existing landscaped area of No 18	35.14m²
Existing landscaped area of No 20	29.70m²
Existing Total landscaped area	64.84m²
Existing % of total landscape area	42.3%
Proposed landscaped area of No 18	35.14m² (unchanged)
Proposed landscaped area of No 20	29.70m² (unchanged)
Proposed Total landscaped area	64.84m²
Proposed % of total landscape area	19.6% (unchanged)
Compliance with the Manly DCP 2103 for total open space	No

Although the proposed works do not comply with the landscape area as defined by the Manly DCP 2013, they do satisfy the objectives of the DCP for the purpose of having landscape space.

The Manly DCP2013 for total open space and landscaping states;

Relevant DCP objectives to be met in relation to these paragraphs include the following:

- | | |
|---------------------|---|
| Objective 1) | <i>To retain and augment important landscape features and vegetation including remnant populations of native flora and fauna.</i> |
| Objective 2) | <i>To maximise soft landscaped areas and open space at ground level, encourage appropriate tree planting and the maintenance of existing vegetation and bushland.</i> |
| Objective 3) | <i>To maintain and enhance the amenity (including sunlight, privacy and views) of the site, the streetscape and the surrounding area.</i> |
| Objective 4) | <i>To maximise water infiltration on-site with porous landscaped areas and surfaces and minimise stormwater runoff.</i> |
| Objective 5) | <i>To minimise the spread of weeds and the degradation of private and public open space.</i> |
| Objective 6) | <i>To maximise wildlife habitat and the potential for wildlife corridors.</i> |

As mentioned above under total open space, the proposed works do not comply with the landscape area, they are appropriate in this circumstance in that;

- There is actually no change in the area of landscaping from the proposed works. Even though the dwelling is increased in size, the area of the new building footprint is to be constructed over existing hardscaped areas, thus technically there is no loss or landscaped as defined in the Manly DCP 2013.
- There is no loss of important landscape features or trees to the site from the proposed works.

Thus, the objectives of landscaped area are still achieved in this case.

- The site still can permit planting of trees are substantial planting to the rear of the existing site.

Thus, the objectives of total landscaped area are still achieved in this case.

- The proposed works do not result in a loss of amenity (including sunlight, privacy and views) to the site, the streetscape and the surrounding area.

Thus, the objectives of landscaped area are still achieved in this case.

- The rear open space is still able to achieve sufficient water infiltration with porous landscaped areas and surfaces.

Thus, the objectives of landscaped area are still achieved in this case.

- The rear of the site still permits wildlife habitat and potential for wildlife corridors.

Thus, the objectives of landscaped area are still achieved in this case.

- All adjoining properties also would not provide sufficient landscaped area to the site as defined by the Manly DCP 2013.

Every house and building in the near vicinity would not satisfy the 30% landscaped area requirements, including both the adjoining properties.

Thus, it would be unfair and unreasonable for a control to be enforced on a site where the existing and established character of the area is inconsistent with that control.

Therefore, non-compliance with the landscaped area to the site with the proposed works are appropriate in this circumstance and are in keeping the character of the vicinity and the adjoining properties.

34.0 Private Open Space

As per the Manly DCP 2013, each dwelling must provide at least 12m² as private open space.

No 18 Denison Street provides 35.14m² of site suitable for private open space and satisfies the regulatory controls.

No 20 Denison Street provides 34.5m² of site suitable for private open space and satisfies the regulatory controls.

Therefore, compliance with private open space is still achieved with the proposed works.

35.0 Visual and Acoustic Privacy

Visual overlooking and sight lines have been minimised to ensure privacy to the occupants and to the adjoining dwellings.

All ground floor works will be hidden by normal 1.8m high boundary fencing, which will inhibit overlooking and maintain privacy to the ground floor.

The proposed first floor WIR to No 18 will not result in any substantial overlooking to the adjoining dwellings, as the room is not a living space and the window is vertically expressed (with a narrow width) which will inhibit overlooking opportunities.

The proposed new skylights will not result in visual and privacy issues.

36.0 Car parking and Driveway

There is no change to the car parking to the site from the proposed works

37.0 Clothes Drying Areas

Both dwellings will maintain external clothes drying areas, with the clothes lines relocated if necessary, from the new ground floor works.

38.0 Setbacks

There is no change to the numerical value of the setbacks from the proposed works.

The proposed new works to the rear and side both dwellings are no greater than the current rear and side setbacks.

39.0 View Sharing

There are no views lost or generated from the proposed works, with the proposed works in an area of existing bulk, mass and height.

40.0 Shadowing

There is minor overshadowing to the adjoining dwellings from the proposed works.

Most new shadows are cast in areas that are already in shadow, or onto walls without any windows or openings.

41.0 Energy and Water Efficiency

The following energy and water efficiency measures will be installed in the proposed works:

- Appropriate insulation to the ceiling and walling
- Water efficient rated bathroom accessories
- Energy efficient lighting and fixtures

A basix report has been provided showing compliance with regulatory controls.

All work complies with the BCA requirements for natural light and ventilation.

42.0 Site Contamination

The site has been used for residential purposes for at least the last 120 years.

It is assumed that there are no site contamination issues on the allotment.

Therefore, during construction only minor safety issues will need to be undertaken.

43.0 Waste Management Plan

A waste management plan, as required under has also been submitted which includes the following:

The disposal of existing materials and waste on site

- The disposal of waste generated during construction
- The continual waste production through use of the dwelling

44.0 Utilities

The utility services currently available to the site include electricity, internet, telecommunications, sewer and water.

It is anticipated that the proposed works will not have any adverse impact on the provision of the available services.

45.0 Conclusion

The proposed works to 18-20 Denison Street, Manly involve the following;

No 18 Denison Street;

- New bathroom and extension to the living room to the eastern side of the ground floor.
- New Ensuite to master bedroom to the eastern side of the first floor.

No 20 Denison Street;

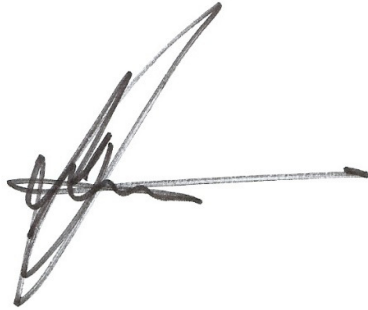
- New bathroom to western side of the ground floor
- 3x new skylights rear of the dwelling.

The proposed works are suitable development in that;

- It provides high quality architectural design.
- It includes sound practices in relation to environmentally sustainable development (ESD).
- The proposed works result in no adverse effects to the streetscape quality.
- There are a high number of similar size additions to other dwellings within the street and the surrounding area. The height, bulk and scale of the building positively relate to the character of the existing and desired future character of the area.
- The proposed works substantially comply with the requirements of the DCP as specified by Manly Council.
- The site is an excellent setting for development of this nature.
- It will have negligible adverse impacts on existing and potential adjoining properties and to the nearby vicinity.
- It is consistent with the strategic principles, aims and objectives of the relevant environmental planning instruments and development control plans.

In respect to the above, it is considered that the proposed works are compatible with appropriate development within the area and should be considered to be given development consent.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Brad Inwood', with a long horizontal stroke extending to the right.

Brad Inwood
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