

3.2 Lot 8 Beacon Hill Road Brookvale - Construction of a Dwelling House

DEVELOPMENT ASSESSMENT REPORT

Assessment Officer:	Lashta Haidari
Address / Property	Lot 8 in DP 1035344 - Lot 8 Beacon Hill Road, Brookvale
Description:	Construction of a dwelling house
Development Application No:	DA2011/0877
Application Lodged:	12/07/2011
Plans Reference:	A101 – A103, A200 – A201, and A300 (issue A) dated 18/06/2011 and prepared by Architect Greg Pickworth.
Amended Plans:	No
Applicant:	Wei Ru Niu
Owner:	W R Niu
Locality:	F4 Brookvale Valley
Category:	Category 1 (Housing)
Draft WLEP 2009 Permissible or Prohibited Land use:	Permissible
Variations to Controls (Cl.20/Cl.18(3)):	No
Referred to ADP:	Yes (more than 5 submissions received)
Referred to WDAP:	No
Land and Environment Court Action:	No
SUMMARY	
Submissions:	A total of six (6) submissions were received: Five (5) objecting and one (1) supporting the proposal.
Submission Issues:	The agreement to restore and enhance the area, Environmental impacts, bushfire impacts, inconsistent with the DFC and other controls relating to environmental impacts, and misleading information.
Assessment Issues:	Lack of Information; Environmental Issues (including clause 56 - Retaining Unique Environmental Features on Site & 58 - Protection of Existing Flora of the General Principles; Desired Future Character; and Residential Issues (notification & submissions).
Recommendation:	Refusal
Attachments:	Site and Elevation Plans

LOCALITY PLAN (not to scale)

Subject Site: Lot 8 in DP 1035344 - Lot 8 Beacon Hill Road, Brookvale

Public Exhibition: The subject application has been publicly exhibited in accordance with the EPA Regulation 2000, Warringah Local Environment Plan 2000 and Warringah Development Control Plan. As a result, the application was notified to 258 adjoining land owners and occupiers for a period of 14 calendar days commencing on 5/08/2011 and being finalised on 22/08/2011.

As result of the notification process, a total of six (6) submissions were received.



SITE DESCRIPTION

The site is legally described as Lot 8 within DP 1035344 known as Lot 8 Beacon Hill Road, Brookvale. The subject site is located on the south –western corner of the Northcliffe Avenue and Warringah Road intersection at Beacon Hill. The site has street frontage of approximately 128m in length to Warringah Road, and approximately 120m in length to Northcliffe Avenue. The total site area is 9.78 ha (i.e. 97,800m²).

The entire site is currently vacant and covered with dense vegetation. The majority of the subject site is identified within the cross hatched area pursuant to the Warringah LEP 2000, with exception of an area (i.e. approximately 4207m²) located in the north-eastern corner of the site.

The area surrounding the site is primarily characterised by residential development in the form of detached style housing on approximately 600m² allotments.

RELEVANT BACKGROUND

A Development Application (DA2010/0478) for the subdivision of one Lot into two lots was lodged with Council on 19 February 2010. The application was assessed and reported to Warringah Development Assessment Panel with a recommendation for refusal. The Panel at its meeting held on the 14 July 2010 considered the application and endorsed the recommendation of the Council by refusing the application on number of grounds including the fact that there was lack of information submitted with the application on vital environmental matters. The critical reason for refusal was the fact that the subdivision line did not conform to the zoning boundaries as the proposed subdivision encroaches into the cross hatched area which is proposed to be zoned “E3 - Environmental Management” under the provision of Draft WLEP 2009.

The applicant lodged a Class 1 Appeal with the Land and Environment Court against Council decision (Proceeding no: 10524 of 2010). During the Court process the applicant amended the plans to remove all references to APZ and future development. The applicant was only seeking consent from the Land and Environment Court for subdivision of one (1) Lot into the two (2) Lots. However, the amended subdivision plan lodged with the Court did not follow the zoning boundary as identified by Council’s Map.

The matter was heard by Senior Commissioner Moore on 3 and 4 March 2011. The judgement was upheld and the subdivision of one Lot into two was approved on that basis that the subdivision line conforms to the zoning boundaries and that no encroachment including the requirement of APZ is to occur on the proposed Lot 2. In summary, the Court found that part (north east portion) of the site is zoned for residential purposes and capable of being developed without any impact or encroachment into the cross hatched area subject to the following conditions:

1. Any future asset protection zones or bushfire trails or roads for Lot 1 are to be contained within Lot 1.
2. A restriction as to user under Section 88B/E is to be placed on the title of Lot 1 in support of condition 3 above. The form of restriction as to user to be approved by Council prior to the release of the subdivision certificate and Council’s Legal costs to be paid by the landowners. The Council is to be named as the sole authority to release, vary or modify the restriction as to user.

The subject application was lodged with Council on 12 July 2011. A Letter was sent to the applicant on 30 August 2011 following the assessment of the application, which identified a number of issues with the application. The issues identified in Council’s Letter were as follows:



Internal Referrals

Natural Environment Section

Attached to this correspondence are specific comments made by Council's Development Natural Environment section. In summary, Council's Natural Environment section has raised concerns in relation to adverse impacts upon the natural / built environment and fact that the information submitted with the application is insufficient to make a thorough assessment of the application

Planning Issues

Warringah Local Environmental Plan 2000

Desire Future Character – F4 Brookvale Valley

There is insufficient information submitted with the application to demonstrate consistency with the requirements of the DFC for the F4 locality. To enable Council to determine whether the proposed dwelling is consistent with this component of the DFC, the following information is essential for an accurate assessment to be made in this regard:

- A detailed Landscape Plan clearly showing the combined impact of trees and vegetation to be retained as well as plantings to be implemented as part of the development proposal. The plan should also provide details (including the name and height) of all existing trees and vegetation to be retained, as well as details of the proposed landscaping.
- Photo montages that clearly show the proposed dwelling and the elevated driveway as it presents to public places, including Warringah Road and Northcliff Ave. These montages should include trees to be retained and proposed landscaping (as it will be in an established state).
- A visual impact study that address the impact of the proposed dwelling and the associated structures as views from various vantage points.
- A sample board specifying all the external colours and materials to be used.

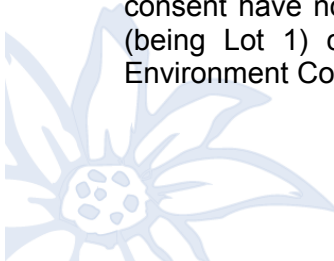
Insufficient Information

The application is deficient with the regards to the following information that is essential for Council to make an accurate assessment with the regards to the applicable Planning controls and to determine the application in accordance with the Environmental Planning and Assessment Act 1979:

- Land owner's consent,
- The application has failed to provide sufficient information to determine if subdivision of land is proposed. The experts report submitted with the application (i.e. the Geotechnical Report, the Flora and Fauna impact Assessment) all refers to the subdivision of land.
- An accurate survey (prepared by registered surveyor) of the entire site has not be submitted. The plan is required to nominate the relative levels (RL's) of the existing natural ground level in relation to the proposed dwelling.

Compliance with the conditions of the subdivision consent No. DA2010/0478

The applicant has not demonstrated that the documents as required by the following conditions of consent have not been submitted with the application to demonstrate that the north east portion (being Lot 1) can be developed in a manner that would be consistent with the Land and Environment Court Judgment.



- Any future asset protection zones or bushfire trails or roads for Lot 1 are to be contained within Lot 1.
- A restriction as to user under Section 88B/E is to be placed on the title of Lot 1 in support of condition 3 above. The form of restriction as to user to be approved by Council prior to the release of the subdivision certificate and Council's Legal costs to be paid by the landowners. The Council is to be named as the sole authority to release, vary or modify the restriction as to user.

The option to withdraw the application was put forward to the applicant. The applicant responded by Letter dated 8 September 2011 which requested an extension of time to submit additional information. The extension of time was not granted by Council as the submission of additional information (including amended plans) would be inconsistent with Councils *"Applications for Development Handling of Unclear, Non-Conforming, Insufficient and Amended Applications"* adopted Policy.

LAND AND ENVIRONMENT COURT

Council has not been advised of any Land and Environment Court action against this Application.

PROPOSAL IN DETAIL

The application seeks consent for the construction of new two storey dwelling house at the north-east corner of the subject site. The proposed dwelling comprises:

Level 1

- 1 bedroom with an ensuite;
- 3 bedrooms;
- Bathroom and utility; and
- Terrace

Level 2

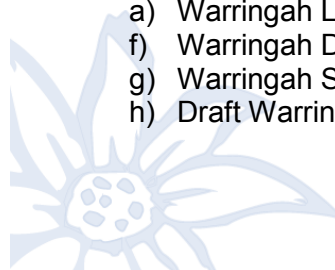
- Double Garage;
- Entry Foyer;
- Family room and kitchen;
- Dining room;
- Lounge room;
- Private open space; and
- Terrace area.

AMENDMENTS TO THE PLAN

There are no amended plans for this application.

STATUTORY CONTROLS

- Environmental Planning and Assessment Act 1979
- Environmental Planning and Assessment Regulations 2000
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy No. 55 – Remediation of Land
- Warringah Local Environmental Plan 2000
- Warringah Development Control Plan
- Warringah Section 94A Developer Contributions Plan
- Draft Warringah LEP 2009



REFERRALS

External Referrals

NSW Rural Fire Service

The NSW Rural Fire service has reviewed the proposed development and has raised no objection to the proposed development subject to conditions that requires compliance with the Applicant's bushfire report.

Aboriginal Heritage office

The Aboriginal Heritage office has reviewed the proposed development and has provided the following comments:

"There are known Aboriginal sites in the Brookvale area. No sites are recorded in the current subdivision, however the area is considered to have high potential for unrecorded sites.

If areas of in situ sandstone outcrop are proposed for impact (such as overhangs over 1m in height or platforms over 2m square), the Aboriginal Heritage Office would recommend a preliminary inspection by a qualified Aboriginal heritage professional.

If sandstone outcrops would not be impacted by the development (and if any outcrops that were present were properly protected during works), then no further assessment is required and the Aboriginal Heritage Office would not foresee any further Aboriginal heritage constraints on the proposal".

Comment: This issue has been further addressed under Clause 83 - Development of Known or Potential Archaeological Sites of this report.

Internal Referrals

Development Engineer

Council's Development Engineer has reviewed the proposal and raised no objection to the proposed development subject to conditions that could imposed within consent if the application was recommended for approval.

Heritage Officer

Council's Heritage officer has reviewed the proposal has raised no objection to the proposed development. The specific comments made by Council's Heritage officer are addressed in detail under Clause 82 - Development in the Vicinity of Heritage Items of this report.

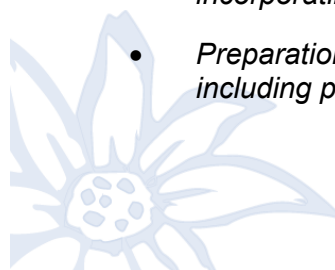
Natural Environment Section

Council's Natural Environment Section has reviewed the proposal and has provided the following comments:

Biodiversity Comments

"The proposed development requires the following further information:

- *Clear identification of the required vegetation clearing for the Asset Protection Zone incorporating an Inner Protection Zone and Outer Protection Zone.*
- *Preparation of a Biodiversity Management Plan in accordance with Council Guidelines including provisions for management and monitoring of the Asset Protection Zone".*



Waterway & Riparian Comments

"The proposed development requires the following further information:

- *Waterway Impact Statement required as three watercourses are located on site.*
- *Survey does not show two of the watercourses.*
- *The proposed Asset Protection Zone (APZ) may affect bank stability, lead to erosion and poor water quality as well as a decrease in aquatic habitat.*
- *APZ to be located outside of the riparian zones and riparian buffers".*

Comment: The concern raised by Council's Natural Environment section is addressed under Clause 56 - Retaining Unique Environmental Features on Site and Clause 58 - Protection of Existing Flora of the General Principles in the General principle section of this report.

NOTIFICATION & SUBMISSIONS RECEIVED

The subject application has been publicly exhibited in accordance with the EPA Regulation 2000, Warringah Local Environment Plan 2000 and Warringah Development Control Plan. As a result, the application was notified to 258 adjoining land owners and occupiers for a period of 14 calendar days commencing on 5/08/2011 and being finalised on 22/08/2011.

As result of the notification process, a total of six (6) submissions were received from the following residences:

Name	Address
CN & FC Doolan	49 Beacon Hill Road, Beacon Hill
A. Sharp	77 Brighton Street, North Curl Curl
M and H Sheriff	1 Northcliffe Avenue, Narrabeena
L. Shiliro	15 Dendrobbium Road, Elanora Heights (supporting the proposal)
G. Dawson	7 Northcliffe Ave, Narrabeena
R. Melville	136 Warringah Road, Beacon Hill

The issues raised in the submissions and the manner which they have been addressed are as follows:

The agreement to restore and enhance the area

A submission received has raised concern that there was a signed agreement between the Metropolitan Aboriginal Land Council, Brookvale community group and Warringah Council to restore and enhance the area and this development. The objector notes that regardless of who bought the land all original undertaken by the MLALC should be honoured.

Comment: The MLALAC had undertaken to protect this site under the tripartite agreement with Warringah Council and the Brookvale Community Group on the 23 February 2004. However, the MLALAC has now sold the site to a private developer and therefore given that one party has pulled out from the tripartite agreement, the agreement is therefore not relevant to the assessment of this application pursuant to Clause 32 of WLEP 2000. The concerns raised are noted but does not warrant the refusal of the application.



Bushfire Risk

Concerns have been raised that that the site is unsuitable for any residential development as it is located in a high risk of destruction in a bushfire area. The following specific concerns have been raised:

- *The bushland hazard assessment report predictably states to the effect that of the dwelling is to be constructed in the proposed location, due to the extreme bushfire rating of the area, it is the opinion of the author that the measures required to be taken to safeguard the building from bushfire includes virtually denuding the entire area of Lot 1 vegetation; and*
- *The developer/owner should be instructed to remove the existing clarification of presenting a fire hazard to all adjoining properties and others within the zone of influence as quoted as being 100m.*

Comment: The proposed development was referred to the NSW Rural Fire Services for comments. The comment received from the RFS indicates that there are no objections to the proposed development provided that the recommendation of the applicant's bushfire report is adopted as conditions of consent. Accordingly, the concerns raised would not warrant the refusal of the application.

Misleading Information

Concerns have been raised that there are number of misleading information provided with the application, including the fact that the Statement of Environmental Effect (SEE) provided an incorrect response.

Comment: The issue raised in relation to the lack of information is concurred with for reasons stated throughout this report. In summary, the information submitted with the application do not contain all the required information to properly assess the application. Owing to the environmentally sensitive characteristics of the land to be developed, the level of information required is greater than if the land was not so environmentally sensitive.

Inconsistent with the DFC Statement for F4 Locality

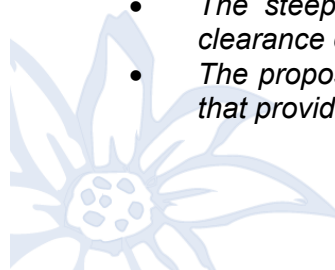
Concerns have been raised that the proposed development is inconsistent with the DFC statement which states: *'In order to protect the bushland and scenic quality of the Valley and to maintain the water quality of Greendale Creek, the head of the Brookvale Valley, as shown cross-hatched on the map, will remain as undeveloped bushland...'*

Comment: This issue has been addressed under the DFC section of this report. In summary, there is insufficient information provided to enable Council to properly assess the impact of the proposal on the bushland and watercourses that are running through the site. Accordingly, the concern raised is concurred with and this issue has been included as a reason for refusal.

Environmental impacts

All of the submissions received have raised significant concerns in relation to the environmental impacts of the proposed. The following specific concerns have been raised in the submissions:

- *The proposal would significantly reduce the size, integrity and sustainability of the isolated remnant bushland.*
- *The steep terrain contains large boulders (floaters) and erosive soils. Disturbance and clearance of vegetation would reduce the stability of the rocks and hillside.*
- *The proposal would require clearance of vegetation including shrubs and understorey plants that provide habitat and protect soils.*



- *The subject site provides habitat for native fauna including birds, waterskins and wallabies. The viability of the bushland is dependent on its size, shape and protection of upper slopes. The proposal would threaten the ongoing viability of the bushland remnant and remove the habitat of native flora and fauna.*
- *The proposed development is inconsistent with several controls as contained in WLEP 2000;*
- *The photo montage provided by the developer is misleading as it does not show the area of bush to be cleared (over 4000m²), nor does it clearly show where the driveway will exit to Northcliffe Avenue.*

Comment: This issue has been addressed throughout this report under General Principles 56 (Retaining unique environmental features on sites) and 58 (Protection of Flora and Fauna), and DFC statement for the F4 locality. In summary, there is insufficient information submitted with the application for Council to accurately assess the impact of the proposal on the surrounding environment.

Stormwater Impacts

Concerns have been raised that the proposed stormwater capture and overflow discharge would alter the hydrology and have indirect impacts on the vegetation, soil moisture and ephemeral creeks. The objector notes that changes to hydrology on the site would affect bushland down slope. Vegetation is dependent on soil moisture and seepage from upslope areas. The drying out of soils would reduce moisture dependent and groundcover plants that hold soils together and prevent erosion.

Comment: Council's Engineers have assessed the stormwater details provided with the application and have found the stormwater to be satisfactory subject to conditions. Accordingly, the concerns raised do not warrant the refusal of the application.

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The relevant matters for consideration under Section 79C of the Environmental Planning and Assessment Act 1979 are:

Section 79C 'Matters for Consideration'	Comments
Section 79C (1) (a)(i) – Provisions of any environmental planning instrument	See discussion on the relevant SEPP's and "Warringah Local Environmental Plan 2000" in this report.
Section 79C (1) (a)(ii) – Provisions of any draft environmental planning instrument	See comments under the Draft Warringah LEP 2009 of this report.
Section 79C (1) (a)(iii) – Provisions of any development control plan	The application was notified in accordance with Warringah Development Control Plan.
Section 79C (1) (a)(iia) - Provisions of any Planning Agreement or Draft Planning Agreement	None applicable.
Section 79C (1) (a)(iv) - Provisions of the regulations	Clause 98 of the EPA Regulation 2000 requires the consent authority to consider the provisions of the Building Code of Australia. This matter has been addressed via appropriate conditions.
Section 79C (1) (b) – The likely impacts of the development, including environmental impacts on the natural and built environment and social and economic impacts in the locality	<p>(i) The environmental impacts of the proposed development on the natural and built environment are addressed under the General Principles of Development Control table in this report. A number of inconsistencies with the relevant controls have been identified which indicate the impact of the development on the built environment is not acceptable.</p> <p>(ii) The proposed development is not considered to have any detrimental social impact on the locality considering the residential character of the proposal.</p> <p>(iii) The proposed development is not considered to have any detrimental economic impact on the locality considering the residential nature of the land use.</p>

Section 79C 'Matters for Consideration'	Comments
Section 79C (1) (c) – The suitability of the site for the development	The applicant has not adequately demonstrated that the site is suitable for the proposed development as there are insufficient information submitted with the application to demonstrate that that proposed dwelling can be constructed in manner that is consistent with the DFC, general principles, and the relevant Schedules under WLEP 2000.
Section 79C (1) (d) – Any submissions made in accordance with the EP&A Act or EP&A Regulation	In regards to public submissions refer to the discussion on "Notification & Submissions Received" within this report. In summary, the public submissions received raise a number of issues which warrant the refusal of the application.
Section 79C (1) (e) – The public interest	The proposed development is not in the public interest as the proposed has been found to be inconsistent with DFC and several general principles.

DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

Draft Warringah Local Environmental Plan 2009 (Draft WLEP 2009)

The public exhibition of the draft Warringah Local Environmental Plan 2009 (the draft LEP) commenced on 12 October 2009 and ended on 30 December 2009. The draft LEP 2009 was adopted by Council at its meeting held on 8 June 2010. The Draft LEP is therefore a relevant matter for consideration under Section 79C of the EP&A Act.

Definition(s): **Dwelling House-** *means a building containing only one dwelling*

Land Use Zone: R2 Low Density Residential and E3 Environmental Conservation
(Note - The proposed dwelling and associated works are located within the R2 Zone).

Permissible or Prohibited: Dwelling House is permissible in the R2 Zone

Additional Permitted used for particular land – Refer to Schedule 1: Not Applicable

Principal Development Standards for R2 Zone:

Development Standard	Required	Proposed	Complies	Clause 4.6 Exception to Development Standard
Minimum Subdivision Lot Size:	600m ²	R2 Zone is 4,465m ²	YES	Not Applicable
Rural Subdivision:	Not applicable	Not applicable	Not applicable	Not Applicable
No Strata Plan or Community Title Subdivisions in certain rural and environmental zones:	Not applicable	Not applicable	Not applicable	Not Applicable
Height of Buildings:	8.5	Insufficient information has been provided with the application to determine the height of the dwelling in accordance with definition of DWELP 2009.	No (refer to discussion below)	Not Applicable

The subject site is located within two different zoning under the DWLEP 2009. Part of the site being the portion of the site that is located at north eastern corner is proposed to be zoned 'R2 Low Density Residential' and the remaining of the site is proposed to be zoned 'E3 Environmental Conservation'. The proposed dwelling housing and the associated Asset Protection Zone for bushfire purposes are located within with R2 zone and therefore the proposed development is permissible with consent.

The Principal Development Standard in Part 4 of the draft LEP relevant to the proposed development is 'Height of buildings'. The draft Height of Buildings Map referred to in Clause 4.3(2) of the draft LEP shows that an 8.5m height limit applies to the site. There is insufficient information (i.e. an accurate survey (prepared by registered surveyor) of the entire site to nominate the relative levels (RL's) of the ground level (existing) in relation to the proposed dwelling) submitted with the Application to determine the building height as per the definition of DWLEP 2000. Based on the insufficient information submitted with the application Council is unable to undertake an accurate assessment of the application with regards to the requirement of part 4 of DLEP 2009 and therefore this issue has been included as reason for refusal.

Clause 6.16 'Development on sloping land' also applies to the proposed development as the majority of the site is located within the Land Slip Risk Area B and C and a small portion of the northern eastern corner of the site is located within the Land Slip Risk Area A. Clause 6.16(3) of the draft LEP sets out the following requirements for development on sloping land;

'Development consent to development on land to which this clause applies must not be granted unless the consent authority is satisfied that:

- a) the application for development has been assessed for the risk associated with landslides in relation to both property and life, and*
- b) the development will not cause significant detrimental impacts because of stormwater discharge from the development site, and*
- c) The development will not impact on or affect the existing subsurface flow conditions.'*

A Geotechnical Assessment (Ref 20151VB2let) prepared by Jeffery and Katauskas Pty Ltd (8 February 2010) has been submitted with the application. The report is based on the subdivision application and has not addressed the proposed development being a dwelling house on the subject site. Based on the insufficient information submitted with the application Council is unable to undertake an accurate assessment of the application with regards to the requirement of 6.16 of DLEP 2009 and therefore this issue has been included as a reason for refusal.

State Environmental Planning Policies

Further consideration is required for the following State policies:

State Environmental Planning Policy No. 55 – Remediation of Land

Clause 7(1)(a) of State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) and Clause 48 of WLEP 2000 state that a consent authority must not consent to the carrying out of any development on land unless;

- *It has considered whether the land is contaminated, and*
- *If the land is contaminated, it is satisfied that the land is suitable in its contaminated state for the purpose for which the development is proposed to be carried out, and*
- *If the land requires remediation to be made suitable for the development proposed to be carried out, it is satisfied that the land will be remediated before the development is carried out.*

Council records indicate that the site has historically been vacant for a significant period of time. Based on a site inspection and a desktop investigation into the site's land use history there is no evidence to suggest that the site is contaminated. Accordingly, no further consideration is required pursuant to the provisions of Clause 48 - Potentially Contaminated Land of Warringah LEP 2000 or SEPP 55.



State Environmental Planning Policy (Infrastructure) 2007

Clause 45 of SEPP Infrastructure requires the Consent Authority to consider any development application (or an application for modification of consent) for any development carried out:

- *Within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists);*
- *Immediately adjacent to an electricity substation; or*
- *Within 5m of an exposed overhead electricity power line.*

The application was referred to Ausgrid to determine if the subject site was within or immediately adjacent to any of the above electricity infrastructure. Ausgrid by letter dated 25 July 2011 stated that the subject site was not affected by any of the above electricity infrastructure. In this regard, the subject application is considered to satisfy the provisions of Clause 45 SEPP Infrastructure.

STATUTORY CONTROLS

Warringah Local Environmental Plan 2000

Desired Future Character

The subject site is located in the F4 Locality under Warringah Local Environmental Plan 2000. The Desired Future Character Statement for this locality is as follows:

LOCALITY F4- Brookvale Valley

The Brookvale Valley locality will remain an area characterised by a mixture of detached style housing and apartment buildings interspersed with a range of complementary and compatible uses. In order to protect the bushland and scenic quality of the Valley and to maintain the water quality of Greendale Creek, the head of the Brookvale Valley, as shown cross-hatched on the map, will remain as undeveloped bushland except for the land at Lot 7 DP 236335 where a maximum of one dwelling may be erected provided the design and construction of that development has regard to the topography, potential slip and sensitive visual character of the land as well as potential loss of views to adjoining or nearby properties. The development of further apartment buildings will be confined to the “medium density areas” as shown on the map.

Outside the “medium density areas” future development will maintain the visual pattern and predominant scale of existing detached housing in the locality. The streets will be characterised by landscaped front gardens and consistent front building setbacks. The spread of indigenous tree canopy will be protected throughout the locality and enhanced where possible. Unless exemptions are made to the housing density standard in this locality statement, any subdivision of land is to be consistent with the predominant pattern, size and configuration of existing allotments in the locality.

Redevelopment of the Brickworks site will include the rehabilitation of Greendale Creek (where it passes through the site) and will regard the Creek to be an important landscape feature and focal point of the development. The maintenance and restoration of riparian zones of the creek will be required as part of any development of the Brickworks site. This riparian zone is required to adequately filter sediment, prevent bank erosion, ensure a sustainable mix of different plant species for genetic diversity, and provide unique habitats and to act as a corridor function linking larger areas of remnant vegetation. The siting and design of buildings and landscaping treatment of the Brickworks site is to achieve a transition between development and surrounding bushland. In this regard, canopy trees and other landscaping used on the site is to predominantly be of species found on the bushland slopes shown cross-hatched on the map.



Pursuant to Clause 14(2) of WLEP 2000 a dwelling house in area that is not in cross hatched areas is identified as Category 1 in this locality. Clause 12(3)(b) of WLEP 2000 states that prior to granting consent for development identified as Category 1 the consent authority must be satisfied that the development is consistent with the desired future character described in the relevant Locality Statement.

An assessment of the proposal having regard to the relevant elements of the DFC has been undertaken as follows:

The Brookvale Valley locality will remain an area characterised by a mixture of detached style housing and apartment buildings interspersed with a range of complementary and compatible uses.

Comment: The proposed development is for the construction of one (1) dwelling on site that has an area of 9.78 ha (i.e. 97,800m²) in total. The proposed dwelling located on the north eastern corner of the site fronting Warringah Road and will occupy a total area of approximately 286m² of the site. The proposed dwelling house will have the appearance of detached style housing and therefore consistent with this component of the DFC.

In order to protect the bushland and scenic quality of the Valley and to maintain the water quality of Greendale Creek, the head of the Brookvale Valley, as shown cross-hatched on the map, will remain as undeveloped bushland.

Comment: The site contains significant area of bushland and the majority of the site is shown in the cross hatched on the map. There is insufficient information provided to enable Council to properly assess the impact of the proposal on the bushland and watercourses that are running through the site. Accordingly, Council is unable to assess the proposal against this component of the DFC and this issue has been included as a reason for refusal.

The spread of indigenous tree canopy will be protected throughout the locality and enhanced where possible.

Comment: As indicated above, there is insufficient information for Council to determine the extent of disturbance that will occur to the bushland as result of the excavation and construction process. Accordingly, Council is unable to assess the proposal against this component of the DFC and this issue has been included as a reason for refusal.

Unless exemptions are made to the housing density standard in this locality statement, any subdivision of land is to be consistent with the predominant pattern, size and configuration of existing allotments in the locality.

Comment: The application has failed to provide sufficient information to determine if any subdivision of land is proposed. The plans submitted with the application shows a line which separates the north east part of the lot from the cross hatched area. It is also noted that experts report submitted with the application refers to the subdivision of the land, however the application form and statement of Environmental Effect (SEE) only refers to the construction of a dwelling house on site.

Based on the information submitted with the application council cannot determine whether this component of the DFC is even relevant to the proposed development and this issue has been included as a reason for refusal.

Built Form Controls (Development Standards)

The following table outlines compliance with the Built form controls of the above locality statement:

Built Form Standard	Required	Proposed	Compliance
Housing Density	1 per 600m ²	1 per 9.78 ha (97,800m ²)	Existing Allotment
Building Height	8.5m ground – roof 7.2m ground - ceiling	8.4m at height point 5.6m at height point	YES YES

Built Form Standard	Required	Proposed	Compliance
		Note – the height calculation is based on the sections of the architectural plans submitted with the application.	
Front Setback Corner Lot	6.5m (Northcliffe Ave) 3.5m (Warringah Road)	50m 7.6m	YES
Rear Setback	6.5m	Not Applicable as the site has dual street frontage.	Not Applicable
Building Envelope	45/4m	Complies on southern and western elevations	YES
Side Setback	0.9m (southern) 0.9m (western)	Greater than 100m Greater than 100m	YES YES
Landscaping	40%	96%	YES

GENERAL PRINCIPLES OF DEVELOPMENT CONTROL

The following General Principles of Development Control as contained in Part 4 of Warringah Local Environmental Plan 2000 are applicable to the proposed development:

General Principles	Applies	Comments	Complies
CL38 Glare & reflection	YES	Clause 38 states that development is not to result in overspill of glare from artificial illumination, or sun reflection, which would unreasonably diminish the amenity of the locality. A condition could be included in any consent if the application was worthy of approval to ensure that the external finish to the roof is medium to dark in colour to minimise the reflectivity of the roof. A condition could also be included to ensure that the reflectivity index of external glazing for windows, walls or roof finishes of the proposed development is to be no greater than 20%.	YES subject to conditions
CL39 Local retail centres	NO	No comment	Not Applicable
CL40 Housing for Older People and People with Disabilities	NO	No comment	Not Applicable
CL41 Brothels	NO	No comment	Not Applicable
CL42 Construction Sites	YES	Construction is proposed. Conditions could be included on the consent if the application is approved to reduce the impacts of construction works on the adjoining properties such as restricted construction hours, requirements for sediment and erosion control and construction management.	YES subject to conditions
CL43 Noise	YES	The proposed new dwelling will not generate any significant or additional noise. A condition could be included in the consent if the application was approved to ensure that noise emissions during construction will be limited to council's standard construction hours.	YES subject to condition
CL44 Pollutants	YES	The proposed new dwelling will not result in any pollutants.	YES
CL45 Hazardous Uses	NO	No comment	Not Applicable
CL46 Radiation Emission Levels	NO	No comment	Not Applicable

General Principles	Applies	Comments	Complies
CL47 Flood Affected Land	NO	No comment	Not Applicable
CL48 Potentially Contaminated Land	YES	The site has historically been vacant and there is no evidence to suggest that the site is contaminated.	YES
CL49 Remediation of Contaminated Land	NO	No comment	Not Applicable
CL49a Acid Sulfate Soils	NO	No comment	Not Applicable
CL50 Safety & Security	YES	The proposed new dwelling will not be detrimental to the safety and security of the locality. The development is considered to maintain and where possible enhance the safety and security of the locality and is satisfactory in addressing the General Principle.	YES
CL51 Front Fences and Walls	NO	No front fence is proposed as part of this application.	Not Applicable
CL52 Development Near Parks, Bushland Reserves & other public Open Spaces	No	Clause 52 requires that development adjacent to parks, bushland reserves and other public open space, including another any other public open space is to be complementing the landscape character and public use and enjoyment of the land. The subject site does not adjoin or is adjacent to a park, bushland reserves and other public open space and therefore the requirement of this Clause is not applicable.	Not Applicable
CL53 Signs	NO	No comment	Not Applicable
CL54 Provision and Location of Utility Services	YES	The site is satisfactorily serviced with utility services including the provision for the supply of water, gas, telecommunications and electricity and the satisfactory management of sewage and drainage. The development meets the requirements of Clause 54 of WLEP2000.	YES
CL55 Site Consolidation in 'Medium Density Areas'	NO	No comment	Not Applicable
CL56 Retaining Unique Environmental Features on Site	YES	Council's Natural Environmental unit has reviewed the proposal has indicated that there is insufficient information provided to properly assess the impact of the proposed development on the bushland area of the site. In the absence of accurate information, Council is unable to assess the impact of the proposal in relation to the requirement of this Clause. This issue has been included as a reason for refusal.	No
CL57 Development on Sloping Land	YES	This Clause requires that on sloping land, the height and bulk of development, particularly on the downhill side, is to be minimised and the need for cut and fill reduced by designs which minimise the building footprint and allow the building mass to step down the slope. The subject site is identified as landslip area therefore any future development on the subject site needs to be consistent with the requirements of this Clause. A geotechnical report has been submitted with the application. The report prepared by Jeffery and Katauskas Pty Ltd (dated 8 February 2010) have provided the following comments: <i>"Since the development is currently only at subdivision stage no details of the final proposed structures or development of the individual allotments have been determined."</i>	No

General Principles	Applies	Comments	Complies
		<p><i>We consider that the proposed development may proceed provided the specific recommendation of the report is adopted to control the risk of instability. However, the recommendations provided below are in general terms only as the specific details of development have not been determined. These recommendations must be reviewed and amplified once the exact details of the developments are known i.e. building layouts, design levels, building loads”.</i></p> <p>The report provides no details in relation to the proposed dwelling.</p> <p>Accordingly, the application is found to be inconsistent with the requirement of this Clause and this issue has been included as a reason for refusal.</p>	
CL58 Protection of Existing Flora	YES	<p>Council's Natural Environment section and Landscape officer has reviewed the proposal and has indicated that the proposed development is inconsistent with the requirement of these Clauses due to the fact there is insufficient information submitted with the application for an accurate assessment to be made in this regard.</p> <p>For the above reasons, the application is found to be inconsistent with the requirement of this Clauses and this issue has been included as a reason for refusal.</p>	No
CL59 Koala Habitat Protection	YES	<p>This clause applies to parcels of land, being all adjacent or adjoining land held in the same ownership, that are:</p> <ul style="list-style-type: none"> • Greater than 1 hectare in area, and • Potential koala habitat. <p>The site is greater than 1ha in size and contains the potential koala habitat, accordingly the requirement of this Clause applies to this development.</p> <p>The Flora Fauna report submitted with the application (prepared by GIS Environment Consultants – dated 19/02/2010) has provided the following comments in relation to the requirement of this Clause:</p> <p><i>“The site is greater than 1ha in size and contains potential Koala habitat due to its abundance of Eucalyptus punctata trees which is one of 10 important food trees for koalas in NSW. No Koalas have been spotted or scats have been found during this survey. The nearest Koala sighting recorded on the NPWS Atlas in 1973 was 1.8km to the north-east. The latest Koala sighting within a 5km radius of the site was in 1994 in Ku-ring-gai Chase National Park, over 3km from the site. The other recorded sightings of Koalas within 5km of this site are from between 1940 and 1967. This property is a relatively isolated patch of bushland. It is unlikely that a koala make its way onto this property due to the urban landscape surrounding. This property is therefore not considered to be core koala habiate as per definition of the Warringah Council LEP”.</i></p> <p>Council's Natural Environment section has reviewed the proposal and concurs with the finding of the applicant's flora and fauna report in that the site is not considered to be core koala habitat.</p> <p>Accordingly, the proposed development is consistent with the requirement of this Clause.</p>	YES

General Principles	Applies	Comments	Complies
CL60 Watercourses & Aquatic Habitats	NO	<p>Council's Natural Environment section has reviewed the proposed development and advised that the application has not provided a satisfactory Waterway Impact Study taking into consideration the natural watercourse that are located through out the site.</p> <p>The Waterway Impact Study is required to provide further detail under the provisions of this Clause.</p> <p>The proposed development is therefore not consistent with the requirement of this Clause and this issue has been included as a reason for refusal.</p>	NO
CL61 Views	YES	<p>Clause 61 states that development is to allow for the reasonable sharing of views.</p> <p>Due to the topography and location of the site, it is unlikely that the proposed development will affect any significant views.</p> <p>For these reasons it is considered that the proposed development is consistent with the provisions of Clause 61.</p>	YES
CL62 Access to sunlight	YES	<p>The shadow diagrams submitted with the application have been assessed and demonstrate that the proposed development will not result in any significant overshadowing impacts. Sunlight access to at least 50% of private open spaces is maintained for no less than 2 hours between 9am and 3pm on June 21st. It is considered that a reasonable and equitable level of sunlight is maintained and the development is satisfactory in this regard.</p>	YES
CL63 Landscaped Open Space	YES	<p>The landscaped open space provision for the site compliance with the numerical requirements contained within Warringah LEP 2000.</p> <p>Accordingly, the proposal is considered satisfactory in terms of landscaped open space.</p>	YES
CL63A Rear building setback	YES	<p>The subject has two street frontages and therefore the requirement of this Clause is not applicable to the proposed development.</p>	Not Applicable
CL64 Private open space	YES	<p>The proposal provides greater than 60m² private open space with dimensions of greater than 5m. This space is set apart for private use, is directly accessible from the living area and receives not less than 2 hours of sunlight between 9am and 3pm on 21st June. The development is considered satisfactory in addressing the requirements of Clause 64.</p>	YES
CL65 Privacy	YES	<p>Clause 65 states that development should not cause any unreasonable and direct overlooking of habitable rooms and principle private open spaces of other dwellings.</p> <p>The proposed dwellings has been design to comply with the requirements of Clause 65, given the spatial separation provided between the proposed new dwelling and the adjoining residential properties.</p> <p>The proposed development is considered satisfactory in addressing the requirements of Clause 65.</p>	YES
CL66 Building bulk	YES	<p>This general principle seeks to ensure that development does not dominate the streetscape by virtue of its bulk or is inconsistent with the scale of nearby development.</p> <p>The proposed new dwelling is satisfactory in relation to the built form controls of the F4 locality statement and as such, is not excessive in size, bulk and scale. The design of the building is acceptable and</p>	YES

General Principles	Applies	Comments	Complies
		appropriately fits in with the existing design of dwellings within the area. The development satisfies Clause 66 of WLEP2000.	
CL67 Roofs	YES	The proposed roof form will complement the local skyline and is integral to the style of the building. The proposal will satisfy the objective of the General Principle.	YES
CL68 Conservation of Energy and Water	YES	The development incorporates features that are consistent with energy and water use conservation. A BASIX certificate has been submitted.	YES
CL69 Accessibility – Public and Semi-Public Buildings	NO	No Comment	Not Applicable
CL70 Site facilities	YES	Adequate space is provided for storage, laundry facilities and clothes drying. The proposed development is satisfactory in addressing Clause 70.	YES
CL71 Parking facilities (visual impact)	YES	The Parking facilities are sited and designed to not dominate the street frontage or other public spaces and is satisfactory in addressing the General Principle.	YES
CL72 Traffic access & safety	YES	The site is located on a local road network. Accordingly, the traffic using this part of Northcliffe Ave would be generally small volumes of local traffic. The proposed development will not change the existing traffic access and safety and therefore meets this requirement.	YES
CL73 On-site Loading and Unloading	NO	No comment	Not Applicable
CL74 Provision of Carparking	YES	Two (2) car spaces will be provided in the proposed garage, satisfying the parking requirements.	YES
CL75 Design of Carparking Areas	YES	The proposed garage has been designed to provide safe manoeuvring opportunities for vehicles on-site and satisfying the requirements of this general principle.	YES
CL76 Management of Stormwater	YES	Council's Development Engineer has reviewed the proposal and has raised no objection to the proposal subject to conditions.	YES subject to conditions
CL77 Landfill	YES	Insufficient information has been submitted to demonstrate that the site can be developed in the manner that is consistent with the requirement of this Clause. This issue has been included as a reason for refusal.	No
CL78 Erosion & Sedimentation	YES	Development is to be sited and designed and related construction work carried out, so as to minimise the potential for soil erosion. Appropriate conditions associated with management of erosion and sedimentation for the duration of works on the site is considered satisfactory to meet the requirements of Clause 78 of WLEP2000.	YES subject to Conditions
CL79 Heritage Control	YES	The site has no local or state heritage significance, nor is located in a heritage conservation area.	YES
CL80 Notice to Metropolitan Aboriginal Land Council and the National Parks and Wildlife Service	NO	No comment	Not Applicable
CL81 Notice to Heritage Council	NO	No comment	Not Applicable

General Principles	Applies	Comments	Complies
CL82 Development in the Vicinity of Heritage Items	YES	<p>The application was referred to Council's Heritage officer for comments. The following comments were received:</p> <p>The subject site is not a listed item of heritage significance, however is within the vicinity of the following items of heritage significance, listed under WLEP 2000:</p> <p>1. Governor Phillip Lookout</p> <p>Statement of Significance</p> <p><i>'Governor Phillip Lookout has historical significance as a high point in the northern beaches region from which sweeping panoramic views have been gained from early times in the settlement of the colony of NSW, and on which a trigonometrical station was established in 1881. Its western flank has also contributed raw material to the local brick-making industry in the early 20th century. The visual catchments to be gained from it are virtually 360 degrees and have high aesthetic value, encompassing views to the City of Sydney as well as out to the Pacific Ocean. The Lookout is highly esteemed by the community and has been the site of important commemorative occasions such as the bicentennial celebrations.'</i></p> <p>2. Former Brookvale Brickworks</p> <p>Statement of Significance</p> <p><i>'One of the original industries which were set up in the area and which has continued as an operational brickworks from 1914 to its closure in 1998. Historically, it was significant for its use of original brick making machinery to make dry-pressed bricks, thought to be the last in Sydney. However, as a result of a Development Application approved by Warringah Council in 2002 for residential and multi-unit housing to be incorporated into the buildings at the site, the existing land uses at the site have altered the original use of the site for manufacturing and processing industries. While much of the heritage has been protected, adapted and re-used, the fabric of the original items has been much altered by the development.'</i></p> <p>Consideration of the proposed development:</p> <p>The proposed dwelling is situated in the north-eastern corner of the site. The dwelling is located within an area of the site which has been identified under Draft WLEP 2009 as zoned R2 Low Density Residential in anticipation of residential development.</p> <p>Currently, the subject site comprises dense bushland vegetation with no built structures or areas cleared of vegetation.</p> <p>The subject site comprises the remnant bushland setting to the former Austral Brickworks site and is integral to maintaining the landscaped setting and curtilage of the former brickworks site.</p> <p>The location of the proposed dwelling, being within the north-eastern corner of the site, is considered the most suitable in terms of minimising both physical and visual impacts on the former Brookvale Brickworks site and the Governor Phillip Lookout.</p>	YES

General Principles	Applies	Comments	Complies
		<p>While the construction of the dwelling will necessitate the removal of some vegetation, there will be no direct impact on the adjoining and nearby heritage items, maintaining their visual setting and historical significance.</p> <p>Accordingly, there is no objection raised to the proposed development on heritage grounds.</p>	
CL83 Development of Known or Potential Archaeological Sites	YES	<p>The subject site contains a number of exposed and partially exposed rock outcrops. The rock outcrops are predominantly located towards the southern rear corner of the site. The Application was referred to Aboriginal Heritage for comments. The following comments were received:</p> <p><i>"There are known Aboriginal sites in the Brookvale area. No sites are recorded in the current subdivision, however the area is considered to have high potential for unrecorded sites.</i></p> <p><i>If areas of in situ sandstone outcrop are proposed for impact (such as overhangs over 1m in height or platforms over 2m square), the Aboriginal Heritage Office would recommend a preliminary inspection by a qualified Aboriginal heritage professional.</i></p> <p><i>If sandstone outcrops would not be impacted by the development (and if any outcrops that were present were properly protected during works), then no further assessment is required and the Aboriginal Heritage Office would not foresee any further Aboriginal heritage constraints on the proposal".</i></p> <p>Comment: Having regard to the above comments, Council does not have sufficient information to determine whether the proposed dwelling and the associated APZ will not have an adverse impact on the sandstone outcrop located on the subject site. This issue has been included as a reason for refusal.</p>	No

SCHEDULES

Schedule 8 - Site analysis

Site Analysis	Clause 22 of WLEP 2000 requires a site analysis prepared in accordance with Schedule 8 of WLEP 2000. Having regard to the environmental sensitivity of the land comprising the subject site and surrounding land, a detailed graphical and written site analysis is considered essential. However, no site analyses were submitted with the application. This issue has been included as a reason for refusal.
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Schedule 17 - Car parking Provision

Car parking Provision	Refer to Clause 74 General Principles of Development Control WLEP 2000 of this report for assessment. In summary, the proposed dwelling provides a satisfactory number of car spaces.
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POLICY CONTROLS

Warringah Section 94A Development Contribution

The proposed development is subject to the provisions of Section 94A of the EP&A Act and the provisions of the Warringah Section 94A Development Contribution Plan. The applicable contributions are outlined within the table below. If the application is approved a condition of consent could be included on the draft consent to ensure the required contributions are paid prior to the issue of the Construction Certificate.

Warringah Section 94A Development Contributions Plan		
Contribution based on total development cost of		\$489,000.00
Contribution - all parts Warringah	Levy Rate	Contribution Payable
Total S94A Levy	0.95%	4,646
S94A Planning and Administration	0.05%	245
Total	1.0%	\$4,890

CONCLUSION

The site has been inspected and the application assessed having regard to the provisions of Section 79C of the Environmental Planning and Assessment Act 1979, State Environmental Planning Policy (Infrastructure) 2007, State Environmental Planning Policy No.55 – Remediation of Land, Warringah Local Environmental Plan 2000, Draft Warringah Local Environmental Plan 2009, Warringah Development Control Plan and the relevant codes and policies of Council. This assessment has taken into consideration the submitted plans, Statement of Environmental Effects, all other documentation supporting the application.

The assessment of the application has revealed that the application is deficient and unsupportable for a number of reasons including that the information submitted with application do not contain all the required information to properly assess the application with regards to the applicable controls under the provision of WLEP 2000 that apply to the proposed development.

The proposal has also been found to be inconsistent with DFC of the F4 locality in that there is insufficient information submitted to enable Council is determine the impact of proposal on the bushland.

As detailed in the report, the Draft WLEP 2009 is a mandatory matter for consideration under Section 79C (1) (a) (ii) of the Environmental Planning and Assessment Act, 1979 and given the fact that the Plan has been through public exhibition and has been adopted by Council the plan is considered both imminent and certain. Therefore, the draft planning instrument must be given significant weight in the determination of the application. In particular, there is insufficient information submitted with the application for Council to make an accurate assessment with regards to Principal Development Standard in Part 4 relating to building height and Clause 6.16 'Development on sloping land'

Six (6) individual submissions (which included one (1) letter of support and five (5) Letters of objections) were received to the proposed development. The issues raised in the submissions have been addressed in the "Public Notification Section" of this report.

It is considered that the proposed development does not satisfy the appropriate controls and that all processes and assessments have been satisfactorily addressed. Accordingly, the proposal is therefore recommended for refusal.

RECOMMENDATION (REFUSAL)

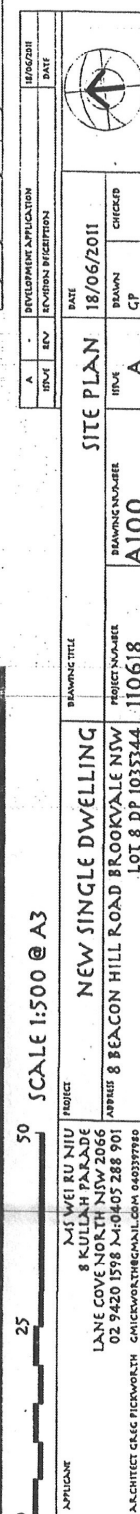
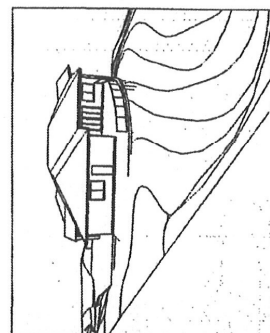
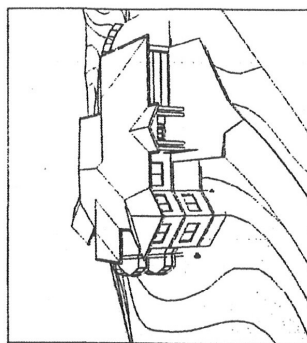
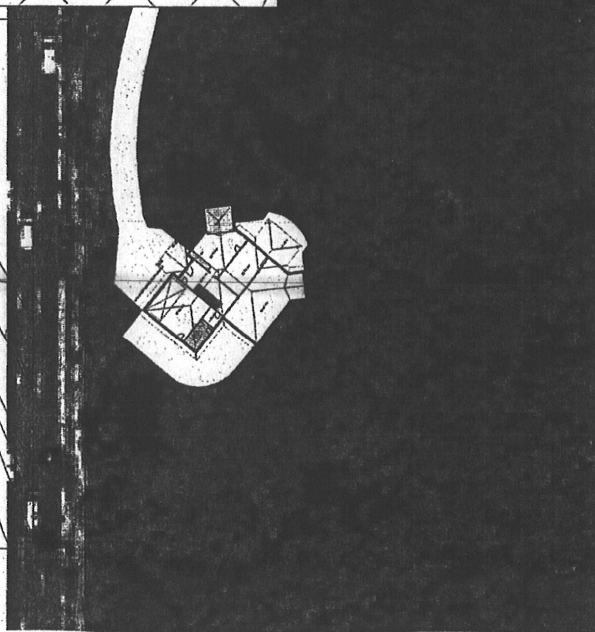
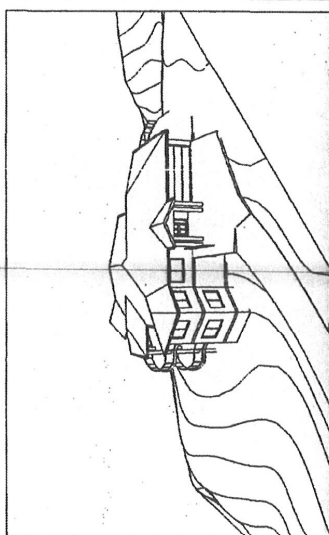
That Council as the consent authority refuse Development Application DA2011/0877 for the construction of dwelling house at Lot 8 in DP 1035344, Beacon Hill Road, Brookvale for the following reasons:

1. Pursuant to Section 79C (1) (a) of the *Environmental Planning and Assessment Act 1979* the proposed development is inconsistent with the Principal Development Standard in Part 4 relating to building height and Clause 6.16 'Development on sloping land' under the provisions of Draft Warringah Local Environmental Plan 2009.
2. Pursuant to Section 79C(1)(a) of the Environmental Planning and Assessment Act 1979 the proposed development is inconsistent with the provisions of Warringah Local Environmental Plan 2000 in that the development is inconsistent with the Desired Future Character Statement of the F4 'Brookvale Valley' Locality.
3. Pursuant to Section 79C (1) (a) of the Environmental Planning and Assessment Act 1979 insufficient information has been submitted with the application for Council to assess the proposal against the following provisions of Warringah Local Environmental Plan 2000:
 - Clause 56 – Retaining Unique Environmental Features
 - Clause 57 – Development on Sloping Land
 - Clause 58 – Protection of Existing Flora
 - Clause 60 - Watercourses & Aquatic Habitats
 - Clause 77 - Landfill
 - Clause 83 - Development of Known or Potential Archaeological Sites
4. Pursuant to Section 79C (1) (a) of the *Environmental Planning and Assessment Act 1979* the proposed development is not consistent with the requirements of the following Schedules of Warringah Local Environmental Plan 2000:
 - Schedule 8 - Site Analysis
5. Pursuant to Section 79C(1)(e) of the *Environmental Planning and Assessment Act 1979* the proposed development is not considered to be in the public interest as the development results in adverse impacts on the natural environment.



Topographic map of the Warrinacah Road area. The map shows a residential area of 4.465 SQM. Key features include:

- Warrinacah Road**: A road running vertically on the left side of the map.
- Northcliffe Avenue**: A road running horizontally at the top of the map.
- Residential Area 4.465 SQM**: A central area outlined with a dashed line.
- Contour Lines**: Lines indicating elevation, with labels such as 100850, 100700, 100550, 100400, 100250, 100100, 99950, 99800, 99650, 99500, 99350, 99200, 99050, 98900, 98750, 98600, 98450, 98300, 98150, 98000, 97850, 97700, 97550, 97400, 97250, 97100, 96950, 96800, 96650, 96500, 96350, 96200, 96050, 95900, 95750, 95600, 95450, 95300, 95150, 95000, 94850, 94700, 94550, 94400, 94250, 94100, 93950, 93800, 93650, 93500, 93350, 93200, 93050, 92900, 92750, 92600, 92450, 92300, 92150, 92000, 91850, 91700, 91550, 91400, 91250, 91100, 90950, 90800, 90650, 90500, 90350, 90200, 90050, 89900, 89750, 89600, 89450, 89300, 89150, 89000, 88850, 88700, 88550, 88400, 88250, 88100, 87950, 87800, 87650, 87500, 87350, 87200, 87050, 86900, 86750, 86600, 86450, 86300, 86150, 86000, 85850, 85700, 85550, 85400, 85250, 85100, 84950, 84800, 84650, 84500, 84350, 84200, 84050, 83900, 83750, 83600, 83450, 83300, 83150, 83000, 82850, 82700, 82550, 82400, 82250, 82100, 81950, 81800, 81650, 81500, 81350, 81200, 81050, 80900, 80750, 80600, 80450, 80300, 80150, 80000, 79850, 79700, 79550, 79400, 79250, 79100, 78950, 78800, 78650, 78500, 78350, 78200, 78050, 77900, 77750, 77600, 77450, 77300, 77150, 77000, 76850, 76700, 76550, 76400, 76250, 76100, 75950, 75800, 75650, 75500, 75350, 75200, 75050, 74900, 74750, 74600, 74450, 74300, 74150, 74000, 73850, 73700, 73550, 73400, 73250, 73100, 72950, 72800, 72650, 72500, 72350, 72200, 72050, 71900, 71750, 71600, 71450, 71300, 71150, 71000, 70850, 70700, 70550, 70400, 70250, 70100, 69950, 69800, 69650, 69500, 69350, 69200, 69050, 68900, 68750, 68600, 68450, 68300, 68150, 68000, 67850, 67700, 67550, 67400, 67250, 67100, 66950, 66800, 66650, 66500, 66350, 66200, 66050, 65900, 65750, 65600, 65450, 65300, 65150, 65000, 64850, 64700, 64550, 64400, 64250, 64100, 63950, 63800, 63650, 63500, 63350, 63200, 63050, 62900, 62750, 62600, 62450, 62300, 62150, 62000, 61850, 61700, 61550, 61400, 61250, 61100, 60950, 60800, 60650, 60500, 60350, 60200, 60050, 59900, 59750, 59600, 59450, 59300, 59150, 59000, 58850, 58700, 58550, 58400, 58250, 58100, 57950, 57800, 57650, 57500, 57350, 57200, 57050, 56900, 56750, 56600, 56450, 56300, 56150, 56000, 55850, 55700, 55550, 55400, 55250, 55100, 54950, 54800, 54650, 54500, 54350, 54200, 54050, 53900, 53750, 53600, 53450, 53300, 53150, 53000, 52850, 52700, 52550, 52400, 52250, 52100, 51950, 51800, 51650, 51500, 51350, 51200, 51050, 50900, 50750, 50600, 50450, 50300, 50150, 50000, 49850, 49700, 49550, 49400, 49250, 49100, 48950, 48800, 48650, 48500, 48350, 48200, 48050, 47900, 47750, 47600, 47450, 47300, 47150, 47000, 46850, 46700, 46550, 46400, 46250, 46100, 45950, 45800, 45650, 45500, 45350, 45200, 45050, 44900, 44750, 44600, 44450, 44300, 44150, 44000, 43850, 43700, 43550, 43400, 43250, 43100, 42950, 42800, 42650, 42500, 42350, 42200, 42050, 41900, 41750, 41600, 41450, 41300, 41150, 41000, 40850, 40700, 40550, 40400, 40250, 40100, 39950, 39800, 39650, 39500, 39350, 39200, 39050, 38900, 38750, 38600, 38450, 38300, 38150, 38000, 37850, 37700, 37550, 37400, 37250, 37100, 36950, 36800, 36650, 36500, 36350, 36200, 36050, 35900, 35750, 35600, 35450, 35300, 35150, 35000, 34850, 34700, 34550, 34400, 34250, 34100, 33950, 33800, 33650, 33500, 33350, 33200, 33050, 32900, 32750, 32600, 32450, 32300, 32150, 32000, 31850, 31700, 31550, 31400, 31250, 31100, 30950, 30800, 30650, 30500, 30350, 30200, 30050, 29900, 29750, 29600, 29450, 29300, 29150, 29000, 28850, 28700, 28550, 28400, 28250, 28100, 27950, 27800, 27650, 27500, 27350, 27200, 27050, 26900, 26750, 26600, 26450, 26300, 26150, 26000, 25850, 25700, 25550, 25400, 25250, 25100, 24950, 24800, 24650, 24500, 24350, 24200, 24050, 23900, 23750, 23600, 23450, 23300, 23150, 23000, 22850, 22700, 22550, 22400, 22250, 22100, 21950, 21800, 21650, 21500, 21350, 21200, 21050, 20900, 20750, 20600, 20450, 20300, 20150, 20000, 19850, 19700, 19550, 19400, 19250, 19100, 18950, 18800, 18650, 18500, 18350, 18200, 18050, 17900, 17750, 176



Site and Elevation Plans

