

# SEPP 65 VERIFICATION STATEMENT

Proposed Residential Development

Date: **26 September 2022**

Job No: 18-0040

Address and property description:  
8-12 Princes Highway, Mollymook  
Lot 3, DP523625

Prepared By:  
Gabe Reed of Edmiston Jones  
RAIA Reg no. 8581

For: R&G Creations

**APPROVED**

**Land and Environment Court of NSW**

**LEC No: 2021/00329677      DA20/1466**

**Date: 27/1/2023**



# INTRODUCTION

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The proposed development at 8-12 Princes Highway, Mollymook has been designed and directed by Gabe Reed, Senior Architect (RAIA - Registered Architect – 8581) in accordance with the requirements of SEPP 65 and the Apartment Design Guide (ADG). The following document outlines the projects compliance with the objectives of the SEPP and the design principles. The compliance matrix provides specific compliance justification of each clause as outlined in the ADG.

## Project Overview

The proposal is for a residential flat building consisting of 28 apartments over 3 storeys with associated basement parking on a sloping site. The development meets the development type under SEPP 65 as the building is 3 storeys and consist of over 4 apartments. The proposals specific requirements and design solutions are outlined throughout this report in accordance with the ADG.



# DESIGN PRINCIPLES

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## Principle 1: Context and Neighbourhood Character

The site is located in a rezoned precinct known as the Ulladulla/Mollymook Gateway, with an objective to increase density and have a significant presence along the highway as a gateway to the town. The site is advantaged by views in most directions, especially the water to the east and escarpment to the west. The existing context is consisting of single dwellings, motels, tourist accommodation and medium density. The attached site context drawing DA02 outlines the existing surrounding development and short term potential for increased density consistent with this proposal. The proposed density is derived from the client's feasibility model, increased demand for housing in the area and the site-specific controls. The proposal has considered the transition to an R2 - low density to the east and increase separation in accordance with the ADG has been provided. The site analysis plan DA02 and supporting compliance diagrams and documents show the developments suitability for the site and precinct both in the current and especially the future context.

## Principle 2: Built Form and Scale

The proposed building form and scale is the outcome of an intense site assessment phase from the outset of our engagement. The assessment looked at development suitability in relation to the context, especially that intended by Council, the site analysis and the development types in relation to feasibility studies. Following a Conciliation meeting on 27 April 2022 regarding RAN-129-2, consideration was given to the proposed "U shaped" building to cater for the stepping of the site, maximise views, increase articulation and separation to neighbours, reduce impact to Seaview St residents and create a strong street presence in accordance with Councils area specific DCP.

Due to the sloping site, the building has been designed with the highest section towards the street. The building's scale is reduced to the rear which adjoins two-storey single dwelling properties.

Open decks are provided to all elevations to increase building articulation and privacy.

Materials are used to highlight the façade in relation to the orientation of which it presents. Solid materials and smaller window openings face the street to improve the building aesthetic, present to the streetscape with familiar materials as well as respond to the western sun and highway noise. As the building turns to face the water, the amount of glazing on the façade increases as a direct response to the water and orientation of adjacent dwellings.

The roof form allows for a varying height, building shading and roof terraces to allow a reduced vertical scale and break up of materials to relate to the pedestrian amenity.

The carpark is located as a basement and sleeved by apartments where it sits above ground level along the east to ensure screening of the parking and access for apartments at ground levels.



### Principle 3: Density

The project consists of **28 apartments, including 5 one bedroom, 7 two bedroom and 16 three or more bedrooms**. The density and mix are consistent with the market of the area and the need for additional housing and variety, especially post bushfire and COVID events. As there are no density controls for this development on the site, a good test of density suitability for a site is the ability to satisfy the car parking requirements over one level, which is a test used throughout the industry. The development achieves this providing a suitable density outcome for the site.

### Principle 4: Sustainability

Edmiston Jones apply the UN Sustainable Design Goals (SDGs), also known as the Oslo Manifesto, to all projects. From the outset some goals and targets were set, resulting in 6 main SDGs being targeted where we asked ourselves the following questions/responses.

#### *1. How can this design help ensure healthy lives and well-being for all at all ages?*

- \* Design in accordance with SEPP 65 and exceeds guidelines where possible
- \* Site has good potential for solar access, with 90% of units receiving solar access during 9-3 in mid-winter.
- \* High level of indoor/outdoor living encouraged through design.
- \* A visual link to the natural aspects of the area including the water to the east and escarpment to the west.
- \* Ease of access and availability to outdoors and exercising/swimming, improving their physical and mental health.
- \* All units will have an outlook to views, whether to the ocean or escarpment with minimal overlooking to neighbours
- \* Good connection to walking paths and roads for ease of access to the town centre and other activities in the area.

#### *2. How can this design support quality education and lifelong learning?*

- \* The design and location offers direct visual links to environmental and cultural features of the areas. The client will be encouraged to further promote this through interpretive information educating occupants and the public of the history of the site, the coastline, escarpment and the indigenous people who originally occupied the land.

#### *3. How can this design contribute to a sustainable energy transition?*

- \* Project to Exceed Basix minimum requirements
- \* Roof forms designed for solar panels, with a solar system proposed which will service apartments and or the common areas/services of the development.
- \* Encourage discussions with client regarding sustainable targets and options throughout the future stages of the project
- \* Electric appliances to be used/encouraged



*4. How can this design help to reduce inequality within and among countries?*

- \* Project to promote Aboriginal history to the site and engagement local community
- \* Good mix of apartments and response to demographics
- \* Design to ensure provision for accessibility both within and around site. Note SEPP65 requires Universal design to 20% of apartments resulting in 6 silver level Liveable Housing Design Guide compliant apartments all with associated parking.

*5. How can this design make our cities more inclusive, safe, resilient, and sustainable?*

- \* Project to exceed minimum Basix requirements
- \* Accessibility throughout as above
- \* Site provides opportunity to separate vehicle and pedestrian access, resulting in a pedestrian friend street frontage, encouraging social interaction and active lifestyles.
- \* Apartments provide good outlook to views of the water and escarpment
- \* Safe design report prepared

*6. How can this design be part of the urgent action that is needed to combat climate change and its impacts?*

- \* Solar panels provided
- \* Over 90% of apartments receive solar access during mid winter and shaded in summer, with 75% achieving cross flow ventilation requirements.
- \* The above will ensure less reliance on Mech systems
- \* Early discussions with Electrical, Hydraulic and Mechanical engineers have ensured efficient systems can be provided and have been catered for in the design.

*6. How can this design be part of caring for our oceans and seas?*

- \* The site is located along the highway with great access to the Shoalhaven coastline. It has the ability to ensure more people have an invested interest into the area and will contribute toward protecting it and looking after the coastline during their time and into the future. The site education referred to above will ensure occupants and guests are aware of opportunities to further their knowledge and appreciation for the site and location.

In conclusion, the goals set good grounds to develop the project and encourage sustainable outcomes in the proposal. In summary the following targets were met.

- The proposed development will comply with the requirements of the Basix Certificate and NatHERS Report.
- Stormwater will be reused for irrigation of the landscape areas.
- The building exceeds the solar access and ventilation requirements set out in the ADG, which is a good result for an increased indoor environment quality by good levels of daylight, controlled solar access and availability for ventilation, while maintaining good outlooks and access to outdoor areas.
- There are various areas available for deep soil planting and groundwater recharge.
- The site exceeds the required, Deep Soil, Landscape and Communal Open Space areas set out in the ADG.
- The Waste Management Report outlines opportunities for recycling and compost systems on site.
- The roof form allows great opportunity for solar panels which is provided in this proposal.
- The project incorporates prefinished durable materials to ensure longevity of materials and reduced ongoing repairs and replacement materials.
- The ongoing use of the development will encourage diversity in its occupant to ensure inclusion of all.
- Easy access to public outdoor recreation areas will encourage social interaction and active lifestyles
- Large Deep soil areas to allow for large plants to improve air quality as well as shade hard building surfaces
- Great outlook from all apartments to water and escarpment to improve liveability and mental health benefits
- High level of accessibility throughout the development



## Principle 5: Landscape

The Landscape design is in accordance with Council's DCP, the ADG and is detailed on the drawings. It has been designed to be sensitive, appropriate to the context and attractive. Planting is proposed in the street setback, building edges, communal open spaces, and the rear setback to not only increase the quality of spaces for the residents but retain some biophilic qualities of the site, but also to improve the amenity of the neighbouring development by giving them an outlook and a privacy screen.

The proposal incorporates generally private open spaces which will ensure landscape works are well maintained and provide good potential for occupants to continue to plant and enjoy the landscape.

Careful consideration to disabled access has been given to ensure safe and suitable pathways are provided. The design also encourages an active street frontage to Princes Highway which is overlooked from the residents to ensure a safe area that will complement the building uses and flexibility while contributing to the community.

## Principle 6: Amenity

The internal spaces of the units have been efficiently designed, with function spaces that are well lit and open to larger outdoor areas and outlook. The quality of space, including height of ceilings, proportions and dimensions of rooms, and the ability of habitable spaces to receive natural light and ventilation, have been closely considered.

Usable private and public outdoor spaces have been provided with generous dimensions.

Acoustic privacy has been enhanced between units with BCA compliant construction, together with adjacent locations of bathroom spaces and other wet areas, rather than locating these spaces adjacent to bedrooms in a nearby unit. The buildings have been provided with separation to adjoining properties in accordance or excess of the requirements of SEPP 65, to enhance visual and acoustic privacy.

## Principle 7: Safety and Security

The building is designed to provide good overlooking to the streets, central common areas and the rear deep soil zone for an increased surveillance. Security control through fences and gates will be provided to prevent public access to common and landscaped areas. Balcony screening is provided to the street to reduce security issues and provide a sense of privacy for the occupants while still allowing overlooking for surveillance of the street.

A preliminary Safe Design report has been prepared for the development to consider some of the risks which have been carried through in the design.



## Principle 8: Housing Diversity and Social Interaction

The development provides a range of unit layouts, areas and location to cater for a wide range of demographics. The building has been designed with consideration to baby boomers and potential elderly occupants who may be looking to downsize or maintain self-reliance and for families with a wide range of flexibility. Discussions with an affordable housing provider have been made with the potential to accommodate a level of affordable housing once the project progresses.

As noted above a variety of spaces and connections have been provided to enhance social interaction within the development and with the community. Given its proximity to the town centre, this is essential to ensure the project is part of the community and the people.

The building has also closely considered accessibility for persons with a disability, with access from the street to all levels and communal areas via a lift. In addition, Universal design to 20% of apartments resulting in 6 silver level Liveable Housing Design Guide compliant apartments all with associated parking is provided.

## Principle 9: Aesthetics

The project presents a contemporary and sensitive aesthetic solution, appropriate to the standard of accommodation offered and to the character of the area. Through a combination of variety and warmth of materials, articulated balconies and building lines, simple and elegant roof forms, and contemporary landscaping, the development provides quality and interest in aesthetic character.

Materials of texture brickwork, lightweight cladding and feature elements including timber are used for external walls. The roofs vary with framed colorbond roofs creating architectural roof forms and flat concrete roofs with parapets creating linking forms and roof terraces. Balustrades relate to location and orientation, with solid or partially solid balustrades used for acoustic protection to the street and privacy at lower levels, while glass balustrades are used to maximise sunlight and views to upper levels.



# APARTMENT DESIGN GUIDE MATRIX

The following table is a summary of the compliance of the above development in accordance with SEPP 65 and the Apartment Design Guide.

OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
3A-1	Site analysis illustrates that design decisions have been based on opportunities and constraints of the site conditions and their relationship to the surrounding context.		Refer to drawings DA/01 and DA02. Site context, analysis and survey plan have led to decisions regarding orientation of units, streetscape and separation with the surrounding context.	Y
3B-1	Building types and layouts respond to the streetscape and site while optimising solar access within the development.		Refer to drawings DA13 -DA16 which show the benefit of articulation to façade walls to improve solar access within the development.	Y
3B-2	Overshadowing of neighbouring properties is minimised during mid winter.		Refer to DA 13 which shows the overshadowing of the property to the south will not significantly impact on their amenity. Overshadowing is not likely on other neighbouring properties.	Y
3C-1	Transition between private and public domain is achieved without compromising safety and security.		The proposal shows building entry points and has ensured accessibility, safety and security is provided. This has been followed through in the landscape concept also.	Y
3C-2	<u>Amenity</u> of the public domain is retained and enhanced.		The improved front setback and road reserve will assist in an improved amenity to the site. The increased side setbacks will assist in maintaining views through the site from the highway. The building will assist in improving the housing quality of the precinct.	Y
<b>3D COMMUNAL AND PUBLIC OPEN SPACE</b>				
3D-1	An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping.	<ol style="list-style-type: none"><li>1. Communal open space has a minimum area equal to 25% of the site (see figure 3D.3).</li><li>2. Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid-winter).</li></ol>	Site area = 3,021m <sup>2</sup> <i>25% of site area = 755m<sup>2</sup></i> Area provided = 805m <sup>2</sup> (27%)  Refer to drawing DA13 for shadow diagrams showing the COS areas receive a minimum 2 hours of direct sunlight between 9am and 3pm at mid winter.	Y
3D-2	Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting.		Refer to Landscape Plans DA04, DA18-21 showing a variety of activity including BBQ / entertaining areas, pool, gym, pathways, gardens and relaxing spaces.	Y





OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE												
3D-3	Communal open space is designed to maximise safety.		Landscape areas have been designed in accordance with ACC Safer by Design code. The Communal Open Space is provided at Ground Floor and first floor with direct overlooking and access from circulation cores and apartments. The COS is only available to residents and suitably screened where adjacent the public domain.	Y												
3D-4	Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood.		This clause does not apply. The proposed development site does not adjoin public open space or bushland.	NA												
3E DEEP SOIL ZONES																
3E-1	Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality.	<div>1. Deep soil zones are to meet the following minimum requirements:</div> <table><tr><th>Site area</th><th>Minimum dimensions</th><th>Deep soil zone (% of site area)</th></tr><tr><td>less than 650m<sup>2</sup></td><td>-</td><td rowspan="4">7%</td></tr><tr><td>650m<sup>2</sup> - 1,500m<sup>2</sup></td><td>3m</td></tr><tr><td>greater than 1,500m<sup>2</sup></td><td>6m</td></tr><tr><td>greater than 1,500m<sup>2</sup> with significant existing tree cover</td><td>6m</td></tr></table>	Site area	Minimum dimensions	Deep soil zone (% of site area)	less than 650m <sup>2</sup>	-	7%	650m <sup>2</sup> - 1,500m <sup>2</sup>	3m	greater than 1,500m <sup>2</sup>	6m	greater than 1,500m <sup>2</sup> with significant existing tree cover	6m	Site area = 3,021m2 <i>7% of site area: 211m2 (required)</i>  Deep soil zone provided: 649m2 (21%)  Refer to site plan for locations (DA03).	Y
Site area	Minimum dimensions	Deep soil zone (% of site area)														
less than 650m <sup>2</sup>	-	7%														
650m <sup>2</sup> - 1,500m <sup>2</sup>	3m															
greater than 1,500m <sup>2</sup>	6m															
greater than 1,500m <sup>2</sup> with significant existing tree cover	6m															



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE												
3F VISUAL PRIVACY																
3F-1	Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy.	<p>Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows:</p> <table><tr><th>Building height</th><th>Habitable rooms and balconies</th><th>Non-habitable rooms</th></tr><tr><td>up to 12m (4 storeys)</td><td>6m</td><td>3m</td></tr><tr><td>up to 25m (5-8 storeys)</td><td>9m</td><td>4.5m</td></tr><tr><td>over 25m (9+ storeys)</td><td>12m</td><td>6m</td></tr></table> <p>Note: Separation distances between buildings on the same site should combine required building separations depending on the type of room. See figure 3F.2).</p> <p>Gallery access circulation should be treated as habitable space when measuring privacy separation distances between neighbouring properties.</p>	Building height	Habitable rooms and balconies	Non-habitable rooms	up to 12m (4 storeys)	6m	3m	up to 25m (5-8 storeys)	9m	4.5m	over 25m (9+ storeys)	12m	6m	Complies. Refer to architectural plans for building setbacks. An increased rear set back of 9m to the eastern elevation is provided to transition to the Low-Density zoning to the east.	Y
Building height	Habitable rooms and balconies	Non-habitable rooms														
up to 12m (4 storeys)	6m	3m														
up to 25m (5-8 storeys)	9m	4.5m														
over 25m (9+ storeys)	12m	6m														
3F-2	Site and building design elements increase privacy without compromising access to light and air and balance outlook and views from habitable rooms and private open space.		A floor plan analysis was conducted to maximise the proposed planning of the apartments which satisfies the objectives of this clause. Further consultation with consultants and Council highlighted a 'U' shaped floor plan to maximise the benefits of the site for the development and surrounding properties.	Y												
3G PEDESTRIAN ACCESS AND ENTRIES																
3G-1	Building entries and pedestrian access connects to and addresses the public domain.		Building entries are shown to connect to the new footpath to Princes Highway.	Y												
3G-2	Access, entries and pathways are accessible and easy to identify.		Entries to the building have been clearly defined in the design. Separation of entry points from a common forecourt allow safe and accessible access to both entries for all users. All points of access are accessible in accordance with AS1428.1	Y												
3G-3	Large sites provide pedestrian links for access to streets and connection to destinations.		Pedestrian links are not required as the entries are aligned with the street frontage.	NA												



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
<b>3H VEHICLE ACCESS</b>				
3H-1	Vehicle access points are designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes.		Vehicle access and egress is provided from the highway in accordance with requirements and consultation with the RMS.	Y
<b>3J BICYCLE AND CAR PARKING</b>				
3J-1	Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas.	<p>1. For development in the following locations:</p> <ul style="list-style-type: none"> <li>- On sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or</li> <li>- On land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre.</li> </ul> <p>The minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less. The car parking needs for a development must be provided off street.</p>	The development complies with Council's DCP requirements with regards to car parking.	Y
3J-2	Parking and facilities are provided for other modes of transport.		The car park includes spaces for visitors, motorbikes and bicycles as well as potential for future vehicle charging areas.	Y
3J-3	Car park design and access is safe and secure.		One car park entry/exit is provided. It has been designed to maximise safety.	Y
3J-4	Visual and environmental impacts of underground car parking are minimized.		The access to the underground car parking is after a short ramp along the southern boundary. The design of the access frontage blends in with the building mass. The access to the ramp from the Highway is screened and landscaped and tie in with the character of the development.	Y
3J-5	Visual and environmental impacts of on-grade car parking are minimised.			N/A



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
3J-6	Visual and environmental impacts of above ground enclosed car parking are minimised.			N/A
<b>4. DESIGNING THE BUILDING</b>				
<b>4A SOLAR AND DAYLIGHT ACCESS</b>				
4A-1	To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space.	<ol style="list-style-type: none"> <li>Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9am and 3pm at mid-winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas.</li> <li>A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid-winter.</li> </ol>	<p>21 of 28 units (75%) receive a minimum of 3 hours direct sunlight between 9am and 3pm at mid-winter. Refer to drawings DA14-16 for assessment diagrams.</p> <p>2 of 28 units (7%) dwelling don't receive direct sunlight between 9 am and 3 pm at mid-winter. These are 1 bedroom units which have good access to POS and views as well as the common areas.</p>	Y
4A-2	Daylight access is maximised where sunlight is limited.		Skylights and pop out windows are provided to enhance sunlight to southern or shaded units.	Y
4A-3	Design incorporates shading and glare control, particularly for warmer months.		Shade devices and terrace screening are incorporated to the façade design.	Y
<b>4B NATURAL VENTILATION</b>				
4B-1	All habitable rooms are naturally ventilated.		The proposal ensures all habitable rooms have access to an operable window on an external wall ensuring ventilation to the spaces.	Y
4B-2	The layout and design of single aspect apartments maximises natural ventilation.		All the habitable rooms of these units are naturally ventilated. Living areas have sliding doors to the terrace	Y



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE												
4B-3	The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents.	<div><div>1.</div><div>At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed.</div></div> <div><div>2.</div><div>Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.</div></div>	21 of 28 units (75%) are cross ventilated. Refer to drawings DA14-16 for assessment diagrams. These are achieved with corner units and cross through units.	Y												
4C CEILING HEIGHTS																
4C-1	Ceiling height achieves sufficient natural ventilation and daylight access.	<div>Measured from finished floor level to finished ceiling level, minimum ceiling heights are:</div> <table><tr><th colspan="2">Minimum ceiling height for apartment and mixed use buildings</th></tr><tr><td>Habitable rooms</td><td>2.7m</td></tr><tr><td>Non-habitable</td><td>2.4m</td></tr><tr><td>For 2 storey apartments</td><td>2.7m for main living area floor 2.4m for second floor, where its area does not exceed 50% of the apartment area</td></tr><tr><td>Attic spaces</td><td>1.8m at edge of room with a 30 degree minimum ceiling slope</td></tr><tr><td>If located in mixed used areas</td><td>3.3m for ground and first floor to promote future flexibility of use</td></tr></table> <div>These minimums do not preclude higher ceilings if desired</div>	Minimum ceiling height for apartment and mixed use buildings		Habitable rooms	2.7m	Non-habitable	2.4m	For 2 storey apartments	2.7m for main living area floor 2.4m for second floor, where its area does not exceed 50% of the apartment area	Attic spaces	1.8m at edge of room with a 30 degree minimum ceiling slope	If located in mixed used areas	3.3m for ground and first floor to promote future flexibility of use	<div>The proposal achieves the required ceiling heights with minimum 2.7m to habitable spaces and 2.4m to non-habitable which will be used for services and air-conditioning units.</div> <div>The floor-to-floor levels up to second floor are generally a minimum 3.05m which ensures the required ceiling heights will be achieved in Tower A. Tower B has a 3.1m floor to floor height. Large scale details have been developed to ensure the structure and services can be contained within these limits.</div> <div>The third floor has a pitching point of generally 2.7m to allow roof form in the central part of the building. This also allows for some of the habitable rooms to have raked ceiling on the third floor with some glazed bulkheads and bedrooms pitching from 2.4m.</div> <div>Where the kitchens are connected to the living/dining areas, a 2400 ceiling over the kitchen may be provided for services and air conditioning.</div> <div>As noted above 2 levels in tower A are proposed with a 3.05m floor to floor height, a large scale detail on DA39 has been provided to show the 2.7m ceiling heights can be achieved.</div>	Y
Minimum ceiling height for apartment and mixed use buildings																
Habitable rooms	2.7m															
Non-habitable	2.4m															
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Attic spaces	1.8m at edge of room with a 30 degree minimum ceiling slope															
If located in mixed used areas	3.3m for ground and first floor to promote future flexibility of use															
4C-2	Ceiling height increases the sense of space in apartments and provides for well-proportioned rooms.															
4C-3	Ceiling heights contribute to the flexibility of building use over the life of the building.															



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE										
4D APARTMENT SIZE AND LAYOUT														
4D-1	The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity.	<div>1. Apartments are required to have the following minimum internal areas:</div> <table><thead><tr><th>Apartment type</th><th>Minimum internal area</th></tr></thead><tbody><tr><td>Studio</td><td>35m<sup>2</sup></td></tr><tr><td>1 bedroom</td><td>50m<sup>2</sup></td></tr><tr><td>2 bedroom</td><td>70m<sup>2</sup></td></tr><tr><td>3 bedroom</td><td>90m<sup>2</sup></td></tr></tbody></table> <div>The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m<sup>2</sup> each.</div> <div>A fourth bedroom and further additional bedrooms increase the minimum internal area by 12m<sup>2</sup> each.</div>	Apartment type	Minimum internal area	Studio	35m <sup>2</sup>	1 bedroom	50m <sup>2</sup>	2 bedroom	70m <sup>2</sup>	3 bedroom	90m <sup>2</sup>	The proposal achieves the minimum internal areas. Refer to drawings DA05-08 and the schedule of units for unit sizes.	Y
Apartment type	Minimum internal area													
Studio	35m <sup>2</sup>													
1 bedroom	50m <sup>2</sup>													
2 bedroom	70m <sup>2</sup>													
3 bedroom	90m <sup>2</sup>													
		<div>2. Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms.</div>	All habitable rooms have a window in an external wall with total minimum glass area in excess of 10% of the floor area.	Y										
4D-2	Environmental performance of the apartment is maximised.	<div>Habitable room depths are limited to a maximum of 2.5 x the ceiling height.</div> <div>In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window.</div>	The proposal complies with the required room depths, in open plan living areas running perpendicular to the external wall ensure the kitchen bench is within 8m of a windows	Y										



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE															
4D-3	Apartment layouts are designed to accommodate a variety of household activities and needs.	<div><div>1.</div><div>Master bedrooms have a minimum area of 10m2 and other bedrooms 9m² (excluding wardrobe space).</div></div> <div><div>2.</div><div>Two bedrooms have a minimum dimension of 3m (excluding wardrobe space).</div></div> <div><div>3.</div><div>Living rooms or combined living/dining rooms have a minimum width of:<div><div>a.</div><div>-3.6m for studio and 1 bedroom apartments.</div></div><div><div>b.</div><div>-4m for 2 and 3 bedroom apartments.</div></div></div></div> <div><div>4.</div><div>The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts.</div></div>	<div><div>1.</div><div>All master bedrooms exceed a minimum area of 9m² excluding robe.</div></div> <div><div>2.</div><div>All bedrooms have a minimum dimension of at least 3m excluding robe.</div></div> <div><div>3.</div><div>All living areas are greater than 3.6m wide for 1 bedders and 4m wide for 2 and 3 bedders.</div></div> <div><div>4.</div><div>cross over units 18, 19, 26 and 27 are designed greater than 4m wide to ensure no deep and narrow areas are provided.</div></div>	Y															
4E PRIVATE OPEN SPACE AND BALCONIES																			
4E-1	Apartments provide appropriately sized private open space and balconies to enhance residential amenity.	<div><div>1.</div><div>All apartments are required to have primary balconies as follows:<table><tr><th>Dwelling type</th><th>Minimum area</th><th>Minimum depth</th></tr><tr><td>Studio apartments</td><td>4m²</td><td>-</td></tr><tr><td>1 bedroom apartments</td><td>8m²</td><td>2m</td></tr><tr><td>2 bedroom apartments</td><td>10m²</td><td>2m</td></tr><tr><td>3+ bedroom apartments</td><td>12m²</td><td>2.4m</td></tr></table></div><div>The minimum balcony depth to be counted as contributing to the balcony area is 1m.</div></div>	Dwelling type	Minimum area	Minimum depth	Studio apartments	4m²	-	1 bedroom apartments	8m²	2m	2 bedroom apartments	10m²	2m	3+ bedroom apartments	12m²	2.4m	All balcony areas comply with the minimum areas set out in the ADG. Refer to drawings DA05-08 and the schedule of units for balcony sizes .	Y
Dwelling type	Minimum area	Minimum depth																	
Studio apartments	4m²	-																	
1 bedroom apartments	8m²	2m																	
2 bedroom apartments	10m²	2m																	
3+ bedroom apartments	12m²	2.4m																	
4E-1 cont.		<div><div>2.</div><div>For apartments at ground level or on a podium or similar structure, a private open space is provided instead of a balcony. It must have a minimum area of 15m2 and a minimum depth of 3m.</div></div>	Units at ground floor and first floor (podium) have a balcony and POS complying with the minimum areas set out in the ADG. Refer to drawings DA05-06 and the schedule of units for balcony/POS sizes.	Y															
4E-2	Primary private open space and balconies are appropriately located to enhance liveability for residents.		The POS has been located off the living areas as an extension of the open plan. Generally, the balconies are contained within the building footprint enabling more private and useable spaces that are protected from weather.	Y															



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE										
4E-3	Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building.		Balconies are integrated with the overall building and landscape design.	Y										
4E-4	Private open space and balcony design maximises safety.		Private open spaces at podium levels are separated from common areas by a landscape buffer with screening and no balconies are accessible from the street frontage or public access.	Y										
4F COMMON CIRCULATION AND SPACES														
4F-1	Common circulation spaces achieve good amenity and properly service the number of apartments.	1. The maximum number of apartments off a circulation core on a single level is eight. This can be increased to 12 where suitable amenity and daylight is provided to the corridor.	There are 2 lift cores servicing all the 28 units. The maximum number of units serviced at one level is 5 apartments, and is generally less on other levels. The corridors are all well-lit and ventilated.	Y										
4F-2	Common circulation spaces promote safety and provide for social interaction between residents.		Each circulation space opens to a foyer area and is secure at each exit level allowing safety and social interaction between residents. On the first floor (podium) the lobby is connected to the communal open spaces.	Y										
4G STORAGE														
4G-1	Adequate, well designed storage is provided in each apartment.	1. In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided: <table><tr><th>Dwelling type</th><th>Storage size volume</th></tr><tr><td>Studio apartments</td><td>4m³</td></tr><tr><td>1 bedroom apartments</td><td>6m³</td></tr><tr><td>2 bedroom apartments</td><td>8m³</td></tr><tr><td>3+ bedroom apartments</td><td>10m³</td></tr></table> At least 50% of the required storage is to be located within the apartment.	Dwelling type	Storage size volume	Studio apartments	4m³	1 bedroom apartments	6m³	2 bedroom apartments	8m³	3+ bedroom apartments	10m³	Each unit complies with storage requirements. Storage is provided within the apartments and is highlighted yellow on the plans.  See the schedule of units attached for calculation details.  Although storage cages are not provided within the car park. There is opportunity for cages above the bonnets of cars for the residents.	Y
Dwelling type	Storage size volume													
Studio apartments	4m³													
1 bedroom apartments	6m³													
2 bedroom apartments	8m³													
3+ bedroom apartments	10m³													





OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
4G-2	Additional storage is conveniently located, accessible and nominated for individual apartments.		Other than apartment storage areas, within the basement, the carpark will have plant rooms which will have designated common store area for use by the building manager which is accessible.	Y
<b>4H ACOUSTIC PRIVACY</b>				
4H-1	Noise transfer is minimised through the siting of buildings and building layout.		Acoustic privacy between units has been managed through suitable insulation and air space in the enclosing walls of the units and suitable building separation. The main source of noise from apartments is expected to come from the balconies which is managed by having walls and screens between adjacent terraces.	Y
4H-2	Noise impacts are mitigated within apartments through layout and acoustic treatments.		The separation of living areas and bedrooms has been considered to provide acoustic separation.	Y
<b>4J NOISE AND POLLUTION</b>				
4J-1	In noisy or hostile environments, the impacts of external noise and pollution are minimised through the careful siting and layout of buildings.		The site is not located in a noisy or hostile environment	N/A
4J-2	Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission.		Terraces are recessed from the boundary for acoustic attenuation and balcony soffits and roof eaves will be lined with timber for improved acoustics. Balustrades (especially facing the highway) will be provided with a break up of materials to soften noise from the highway.	Y
<b>4K APARTMENT MIX</b>				
4K-1	A range of apartment types and sizes is provided to cater for different household types now and into the future.		The development provides a mix of 1, 2 and 3 bedroom units of varying sizes to cater for a variety of occupants.	Y
4K-2	The apartment mix is distributed to suitable locations within the building.		The mix of apartments is spread across the building allowing for different occupants to live in.	Y



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
<b>4L GROUND FLOOR APARTMENTS</b>				
4L-1	Street frontage activity is maximised where ground floor apartments are located.		First floor apartments, <b>that is actually</b> ground level on Princes Highway, are designed to present to the street front with private open space.	Y
4L-2	Design of ground floor apartments delivery amenity and safety for residents.		The ground floor units are suitably fenced, landscaped and screened to ensure security and privacy is maximised.	Y
<b>4M FACADES</b>				
4M-1	Building façades provide visual interest along the street while respecting the character of the local area.		The design has strongly considered the presentation to the street and while considering the impacts on the adjacent properties and potential development on adjacent sites in the future. The materials are long lasting and appropriate to all forms of residential development. The building scale and façade is articulated to reflect the future character of the area while maintaining a sensitive transition from the low density and motels in the areas to this future character.	Y
4M-2	Building functions are expressed by the façade.		The building is representative of a residential use.	N/A
<b>4N ROOF DESIGN</b>				
4N-1	Roof treatments are integrated into the building design and positively respond to the street.		The proposed skillion roof form is typical of the coastal setting and assist in a reduced bulk and scale, especially to the elevations adjoining neighbours as well as shading the elevations below, creating interest and change throughout the day. The forms also allow good opportunity for water collection and solar panel installation as shown on the drawings.	Y
4N-2	Opportunities to use roof space for residential accommodation and open space are maximised.		The roof space is used for private open space that 'opens up' to the views and desirable solar access to the north and east.	Y



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
4N-3	Roof design incorporates sustainability features.		The roof forms allow a significant northern area suitable for installation of a PV system. Refer to the attached roof plan.	Y
<b>4O LANDSCAPE DESIGN</b>				
4O-1	Landscape design is viable and sustainable.		<p>Refer to Landscape drawings DA04 and DA18-22 The following landscape design decisions have ensured that a viable and sustainable outcome is achieved:</p> <ul style="list-style-type: none"> <li>- The reuse of surface water runoff to maintain the landscape areas through its collection and storage in rainwater tanks.</li> <li>- The selection of a native planting palette that requires low maintenance and water requirements.</li> <li>- The maximisation of soft landscape areas such as deep soil planting, gravel and turf to reduce hard surface area runoff and maximizing water intake into the ground.</li> </ul>	
4O-2	Landscape design contributes to the streetscape and amenity.		Refer to Landscape drawings. The landscape design provides good opportunity for social interaction within the street frontage as well as varying planting, including large trees for visual and acoustic screening of the development.	
<b>4P PLANTING ON STRUCTURES</b>				
4P-1	Appropriate soil profiles are provided.		Refer to Landscape drawings DA018-22 Soil profiles for planting on structures have been allowed for in the landscape design, including dense planting, trees or planter boxes	
4P-2	Plant growth is optimised with appropriate selection and maintenance.		<p>Refer to Landscape drawings DA18 - 22 The use of a native planting palette with the following characteristics has been employed to ensure it is optimized for plant growth and maintenance:</p> <ul style="list-style-type: none"> <li>- Drought and wind tolerant plant species.</li> <li>- Low maintenance plant species.</li> <li>- Locally indigenous plant species.</li> </ul>	



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
4P-3	Planting on structures contributes to the quality and amenity of communal and public open spaces.		<p>Refer to Landscape drawings DA18-22</p> <p>Planting on structures will have a direct contribution to enhance the landscape podium, and private open spaces through the following design attributes:</p> <ul style="list-style-type: none"> <li>- Large to medium sized tree plantings to provide shaded areas for residents along with visual relief to the building.</li> <li>- Large and medium sized shrubs to provide a buffer from prevailing winds.</li> <li>- A colourful and vibrant planting palette that creates a sense of interest.</li> <li>- Planting areas have been carefully considered to create usable communal open spaces throughout the year.</li> </ul>	
<b>4Q UNIVERSAL DESIGN</b>				
4Q-1	Universal design features are included in apartment design to promote flexible housing for all community members.		The design permits accessible requirements as per the BCA. The design of the units and common areas permits future flexibility and life cycle options. 20% of apartments achieve the Silver level requirements of the LHDG (units 2, 4, 7, 12, 14, 17 and 22)	Y
4Q-2	A variety of apartments with adaptable designs are provided.		One 1 bed and Six 3 bedroom apartments are provided with Silver Level LHDG compliance. Refer to units 2, 4, 7, 12, 14, 17 and 22	
4Q-3	Apartment layouts are flexible and accommodate a range of lifestyle needs.		The apartment layouts offer accommodation for a variety of ages and lifestyles. Facilities have been provided to respond to different lifestyles and apartments can be adjusted to suit different uses.	Y



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
<b>4R ADAPTIVE REUSE</b>				
4R-1	New additions to existing buildings are contemporary and complementary and enhance an area's identity and sense of place.			N/A
4R-2	Adapted buildings provide residential amenity while not precluding future adaptive reuse.			N/A
<b>4S MIXED USE</b>				
4S-1	Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement.			N/A
4S-2	Residential levels of the building are integrated within the development, and safety and amenity is maximised for residents.			N/A
<b>4T AWNINGS AND SIGNAGE</b>				
4T-1	Awnings are well located and complement and integrate with the building design.			N/A
4T-2	Signage responds to the context and desired streetscape character.			N/A
<b>4U ENERGY EFFICIENCY</b>				
4U-1	Development incorporates passive environmental design.		Passive Environmental Design has been a key consideration in the design and initial floorplate and site analysis as evident in the solar access and ventilation performance of the development.	Y
4U-2	Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer.		Sun shading devices, insert balconies and thermal mass allow the solar access to be maximised and managed throughout the year	Y
4U-3	Adequate natural ventilation minimises the need for mechanical ventilation.		The floor plate analysis considered options to maximise the number of corner units to achieve good natural ventilation to the units. With the addition of the cross through apartments, the development exceeds the minimum requirement with 75% of units achieving cross flow ventilation. All common areas are provided with natural ventilation,	Y



OBJECTIVE NUMBER	OBJECTIVE	DESIGN CRITERIA	COMMENTS	COMPLIANCE
<b>4V WATER MANAGEMENT AND CONSERVATION</b>				
4V-1	Potable water use is minimised.		The proposal will capture roof water in accordance with the Basix to be collected in water tanks for reuse to landscaping.	Y
4V-2	Urban stormwater is treated on site before being discharged to receiving waters.		Urban stormwater is to be managed in accordance with the Stormwater Management Plan and Report via On Site Detention.	
4V-3	Flood management systems are integrated into site design.			N/A
<b>4W WASTE MANAGEMENT</b>				
4W-1	Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents.		Refer to Waste Management Plan for further details.	Y
4W-2	Domestic waste is minimised by providing safe and convenient source separation and recycling.		Refer to Waste Management Plan for further details.	Y
<b>4X BUILDING MAINTENANCE</b>				
4X-1	Building design detail provides protection from weathering.		Building design and articulation of surfaces have been provided for protection from weathering.	Y
4X-2	Systems and access enable ease of maintenance.		All plant areas and services are suitably protected from weather and located accordingly. Access from the property boundaries to all areas within the development is achievable through covered circulation.	Y
4X-3	Material selection reduces ongoing maintenance costs.		Materials have been selected for durability and <b>reduced need</b> of maintenance. Refer to the schedule of external finishes on drawing DA17 for details.	Y



# VERIFICATION STATEMENT

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In conclusion, we confirm the design of the proposed residential flat development has been completed and directed in accordance with the Apartment Design Guide and the design quality principles set out in Part 2 of the SEPP 65 – Design Quality of Residential Flat Development and the above verification statement has been coordinated with all consultants involved in the project.

Gabe Reed  
RAIA - Registered Architect – 8581

**WOLLONGONG**  
T 02 4226 1387

**NOWRA**  
T 02 4421 6822

**BATEMANS BAY**  
T 02 4472 7388

Nom. Architect: Mark Jones Reg. No. 4474 | Edmiston Jones Pty Ltd | ABN 67 003 163 451