

**69 Trafalgar Street & 2-6 Gover Street,  
Peakhurst**

**housing sepp design principle statement**

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August 2024



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## 1.1 background

This report has been prepared by Kennedy Associates Architects for the S4.55(2) application for modification to the deferred development consent that has been granted for:

**Residential Flat Building**

incorporating:

**In-fill affordable self-contained dwellings**

under:

**State Environmental Planning Policy  
(Housing) 2021 – Chapter 2 and Chapter 4**

at

**69 Trafalgar Street & 2-6 Gover Street,  
Peakhurst**

This report summarises impacts on the proposed developments compliance with the provisions of the ADG and its response to the design principles of SEPP (Housing), in its current form

## 1.2 subject site

The subject site is located at:

**69 Trafalgar Street & 2-6 Gover Street,  
Peakhurst**

The subject site is legally described as Lots 162, 163, 164 and 121 DP 36317. The site has an area of 2564m<sup>2</sup> and has a 98m frontage to Gover Street and a 25m frontage to Trafalgar Street.

The site is a corner site and a significant cross fall of approximately 6.0, falling from the south to the north

The site is currently contains four (4) single storey dwellings, each located on an existing lot.

The surrounding sites are all zoned R4 – High Density Residential under the Georges River LEP 2021

The adjacent residential area is currently characterised by a mixture on single and two storey dwellings as well as 3 storey apartment buildings. Peakhurst Park is located across Trafalgar Steet

The site is in close proximity to Riverwood Train Station.

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## 1.3 proposed development

The proposed development includes:

**15 car spaces over a single level of basement car park**

**33 Social Housing units over 3 x 3 storeys buildings including;**

**22 x 2-bedroom units**

**11 x 1-bedroom units**

The proposed development consists of a single 3 storey building that is split into 3 parts with 3 separate cores connecting to a single basement carpark. The building faces both street frontages (Gover Street & Trafalgar Street). Private open spaces to individual units are oriented to the exterior of the development and the primary communal open space is located on the northern side of the building to maximise solar access and amenity.

The proposed development has been designed to respond to the site topography, which falls steeply from south to north and to provide privacy to and from the neighbouring building. The building steps down with the topography, minimizing bulk and maximizing solar access and visual privacy.

The massing of the development has been carefully considered. A significant steps and material changes separates the three (3) parts of the building, breaking down the length of the building. Steps in the building form have been incorporated to increase privacy to and from the development.

Pedestrian entry to the development is both the Gover Street frontage and the Trafalgar Street frontage, with the primary entrances being from Gover Street. Vehicular access is via Trafalgar Street, also including a pedestrian entry to the basement which helps provide a connection to Peakhurst Park

## 1.4 planning framework

The proposed development is an in-fill, self-contained dwelling development for Social Housing.

As such, the proposed development has been designed to comply with the provisions of:

### State Environmental Planning Policy

(Housing) 2021 – Chapter 2 Part 2 Division 1 In-fill affordable housing

and

### State Environmental Planning Policy

(Housing) 2021 – Chapter 4 Design of residential apartment development

SEPP (Housing) Chapter 2 Part 2 Division 1 contains a number of standards and requirements for affordable housing developments. In some instances, these provisions take precedence over the requirements of the SEPP (Housing) Chapter 4, however, where possible, the proposed development attempts to comply with both parts of the SEPP in these instances.

## 1. adg assessment

### 2.1 compliance summary

Following is a summary of the proposed development's compliance with key measures of the ADG.

For detailed analysis of the project's compliance with the ADG, refer to the accompanying Apartment Design Guide Compliance Table.

Objective	Complies	Acceptable
<b>3D-1</b> 1. Communal Open Space Provision	Yes	-
<b>3D-1</b> 2. Solar Access to Communal Open Space	Yes	-
<b>3E-1</b> 1. Deep Soil Zone Provision	Yes	-
<b>3F-1</b> 1. Building Separations	-	Yes
<b>3J-1</b> 1. Car Parking Provision	Yes	-
<b>4A-1</b> 1. Solar Access to Living Rooms and Private Open Space (Sydney Metro Region)	Yes	-
<b>4A-1</b> 2. Solar Access to Living Rooms and Private Open Space (Other Areas)	N/A	-
<b>4A-1</b> 3. Apartments Receiving 0 hrs Solar Access at Mid-Winter	Yes	-
<b>4B-3</b> 1. Cross Ventilation	Yes	-
<b>4B-3</b> 2. Maximum Depth of Cross-Over or Cross-Through Apartments	Yes	-
<b>4C-1</b> 1. Ceiling Heights	Yes	-
<b>4D-1</b> 1. Minimum Apartment Sizes	Yes	-
<b>4D-1</b> 2. Habitable Room Windows	Yes	-
<b>4D-2</b> 1 Habitable Room Depths	Yes	-
<b>4D-2</b> 2. Combined Kitchen / Dining / Living Depth	Yes	-
<b>4D-3</b> 1. Minimum Bedroom Areas	Yes	-
<b>4D-3</b> 2. Minimum Bedroom Dimensions	Yes	-
<b>4D-3</b> 3. Minimum Living Room Width	Yes	-
<b>4D-3.</b> 4. Maximum Width of Cross-Over or Cross-Through Apartments	Yes	-
<b>4E-1</b> 1. Primary Balcony Dimensions	Yes	-

<b>4E-2</b>	1. Ground Floor Private Open Space	Yes	-
<b>4F-1</b>	1. Maximum Apartments Per Core (per floor)	Yes	-
<b>4F-1</b>	2. Maximum Apartments Per Core (10 storeys)	N/A	-
<b>4G-1</b>	1. Storage	Yes	-

NB: The summary above is not intended to be an exhaustive list of all criteria or guidelines outlined in the ADG, nor all design issues which may be applicable to the subject site and/or development. It contains the measures which, in our experience, most directly impact both the residential amenity of proposed developments and their acceptability in terms of urban design.

A broader discussion of how the proposed development addresses the nine design principles of the SEPP (Housing), for which the detailed provisions of the ADG provide support, is included in section three of this report. This discussion addresses the intended outcomes of the ADG, without necessarily providing reference to individual design criteria or guidance.

Where additional criteria or guidance are considered particularly relevant to the proposed development, or where they provide useful clarification on an issue, they are referenced as required.

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## 2.3 discussion of non-compliance

### 3F-1 Visual Privacy

The proposed development deviates from the design criteria of Part 3F-1 Visual Privacy

Part 3F-1 requires Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy

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:

Up to 12m (4 Storeys)  
 Habitable rooms and balconies 6m  
 Non-habitable rooms 3m

There is a minor non-compliance for units 01, 11, 12, 22, 23 and 24, where habitable rooms encroach into non-habitable setbacks. This encroachment is limited in nature, and the windows to areas encroaching into the setback are either secondary high level windows, or are screened, or are orientated 90 degrees to the boundary ensuring privacy is achieved in accordance with this section.

All units living rooms and private open space comply with the building separation requirements

In our opinion, the proposed deviation is acceptable

## 2. design quality assessment

### 3.1 introduction

State Environmental Planning Policy (Housing) 2021 – Chapter 4 Design of residential apartment development identifies references the Apartment Design Guide (ADG) which identifies nine “Design Quality Principles” which aim to improve apartment developments in terms of both residential amenity and urban design outcomes.

An evaluation of the proposed development’s performance in relationship to the principles is included below.

### 3.2 principle 1: context and neighbourhood character

***Good design responds and contributes to its context. Context is the key natural and built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions.***

***Responding to context involves identifying the desirable elements of an area’s existing or future character. Well-designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood.***

***Consideration of local context is important for all sites, including sites in established areas, those undergoing change or identified for change.***

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The proposed development has been designed to respond to its context and neighbourhood character.

In particular it:

- responds to the steep slope of the site, stepping down with the topography
- providing appropriate height scale in keeping with the neighbouring properties along Trafalgar Street and of a suitable scale for the future character of Gover Street.
- provides a highly articulated and modelled massing
- fits within the permissible height plane
- provides social housing units and a range of unit types to cater for the desired demographic
- is of a high-quality contemporary design which responds to and enhances the streetscapes
- provides additional housing in an area with excellent proximity to services and transport

**The proposed development is consistent with this principle**

### 3.3 principle 2: built form and scale

***Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings.***

***Good design also achieves an appropriate built form for a site and the building’s purpose in terms of building alignments, proportions, building type, articulation and the manipulation of building elements.***

***Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook***

The proposed development has been designed to be of an appropriate bulk and scale for the site.

The proposed development is below the allowable floor space ratio under Georges River LEP 2021 and, as such, is considered to be of a scale anticipated by the planning controls.

The development is under the 12m height plane allowable under Georges River LEP 2021.

A key measure of the appropriate bulk and scale of a development is its impacts on neighbours, particularly in terms of visual privacy. The proposed development complies with the ADG requirement for solar access to neighbouring developments and has minor non-compliances with visual privacy that do not result in any negative impacts on neighbours.

Additionally, the proposed development is generally compliant with all ADG provisions for residential amenity such as solar access, cross ventilation, apartment sizes, room sizes, balcony sizes and storage.

The proposed development has been designed to enhance the character of the Gover Street and Trafalgar Street streetscapes by providing facades that are highly articulated and visually engaging.

The streetscape design incorporates:

- a variety of materials and textures including face brick, and metal detailing
- contrasting material colours, including light and dark elements
- a high level of articulation including, projecting balconies, building indentations and architectural roof elements
- careful composition of elements and architectural detailing including treatment of windows, balconies, and balustrades

**The proposed development is consistent with this principle**

### 3.4 principle 3: density

**Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context.**

**Appropriate densities are consistent with the area's existing or projected population. Appropriate densities can be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities and the environment.**

The proposed development has been designed to be of an appropriate density for the site.

The proposed development provides 33 dwellings on a site area of 2564m<sup>2</sup>, which represents a dwelling density of approximately 1 dwelling per 77.69m<sup>2</sup>.

As discussed above, the proposed development is below the allowable floor space ratio, generally complies with all amenity provisions of the ADG and does not result in any negative impacts on neighbours. Further, the proposed development complies with all site based provisions of the ADG and or SEPP (Housing), such as communal open space and deep soil areas.

The proposed development provides social housing units in a well serviced, convenient location.

**The proposed development is consistent with this principle.**

### 3.5 principle 4: sustainability

**Good design combines positive environmental, social and economic outcomes.**

**Good sustainable design includes use of natural cross ventilation and sunlight for the amenity and liveability of residents and passive thermal design for ventilation, heating and cooling reducing reliance on technology and operation costs. Other elements include recycling and reuse of materials and waste, use of sustainable materials and deep soil zones for groundwater recharge and vegetation.**

The proposed development has been designed to achieve good sustainability outcomes.

The residential component of the proposed development is subject to the provisions of BASIX and is accompanied by a certificate outlining its compliance with the environmental sustainability measures required including; resource, energy and water efficiency, passive solar design, water capture and thermal performance. The proposed development is compliant with the current requirements of the NCC 2022 for BASIX

The proposed development meets or exceeds the sustainability measures of the ADG including cross ventilation, solar access to units and communal open spaces, natural light and ventilation, deep soil areas, low maintenance building materials and low maintenance landscaping.

Additionally, as a social housing development, the proposed development caters for the particular portion of the population, providing an attractive, high amenity place and contributing positively to the social sustainability of the area.

**The proposed development is consistent with this principle.**

### 3.6 principle 5: landscape

**Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in attractive developments with good amenity. A positive image and contextual fit of well designed developments is achieved by contributing to the landscape character of the streetscape and neighbourhood.**

**Good landscape design enhances the development's environmental performance by retaining positive natural features which contribute to the local context, co-ordinating water and soil management, solar access, micro-climate, tree canopy, habitat values and preserving green networks.**

**Good landscape design optimises usability, privacy and opportunities for social interaction, equitable access, respect for neighbours' amenity and provides for practical establishment and long term management.**

The proposed development has been designed to incorporate landscape as an integrated element of its overall design.

The landscape design responds to existing site conditions, in particular it:

- has been designed as a continuous landscape
- supports a range of plant sizes and types, including ground covers, shrubs and canopy trees
- has an emphasis on reflecting existing topography
- protects existing trees
- provides a balance of active and passive spaces
- provides deep soil planting in excess of the requirements of the SEPP (Housing)
- includes screen planting for privacy to and from units and the development
- incorporates a range of spaces and facilities for social interaction
- contributes positively to the amenity and living environment of future residents

The proposed landscape design enhances the development's overall design in terms of sustainability, useability, amenity and appearance.

**The proposed development is consistent with this principle.**

### 3.7 principle 6: amenity

***Good design positively influences internal and external amenity for residents and neighbours. Achieving good amenity contributes to positive living environments and resident wellbeing.***

***Good amenity combines appropriate room dimensions and shapes, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas and ease of access for all age groups and degrees of mobility.***

The proposed development has been designed to provide a high level of amenity for future residents.

The proposed development generally complies all ADG requirements for amenity for solar access, cross ventilation, apartment size and layout, visual privacy, storage, and private and communal open spaces.

In addition to meeting the requirements of the ADG, the proposed development includes a number of other elements which enhance the residential amenity for future residents. These include:

- all units are greater than the minimum required size
- majority of units are dual aspect
- communal spaces are provided that exceeds the minimum solar requirements
- all areas of the development are easily and equitably accessible for users of all age groups and degrees of mobility.
- high quality contemporary design and well-considered landscape

As previously discussed, the proposed development does not negatively impact on the amenity of neighbouring properties.

**The proposed development is consistent with this principle.**

### 3.8 principle 7: safety

**Good design optimises safety and security within the development and the public domain. It provides for quality public and private spaces that are clearly defined and fit for the intended purpose. Opportunities to maximise passive surveillance of public and communal areas promote safety.**

**A positive relationship between public and private spaces is achieved through clearly defined secure access points and well lit and visible areas that are easily maintained and appropriate to the location and purpose.**

The proposed development has been designed to achieve good outcomes for the safety of residents.

The proposed development is consistent with the Crime Prevention Through Environmental Design (CPTED) principles established by NSW Police

A high level of safety and security is achieved through:

- clearly defined building entries
- legible, continuous wayfinding throughout the development
- casual surveillance to the public domain and communal areas from living areas of balconies
- encouraging a sense of ownership through high quality, durable finishes, and contemporary aesthetic design

**The proposed development is consistent with this principle**

### 3.9 principle 8: housing diversity and social interaction

**Good design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets.**

**Well designed apartment developments respond to social context by providing housing and facilities to suit the existing and future social mix.**

**Good design involves practical and flexible features, including different types of communal spaces for a broad range of people and providing opportunities for social interaction among residents.**

The proposed development has been designed to achieve an appropriate level of housing diversity and social interaction.

The proposed development responds to the demand for affordable housing in the area, providing 33 self-contained social housing units including:

- 22 x 2-bedroom units
- 11 x 1-bedroom units

Four of the units are Adaptable, in accordance with the DCP requirements. All remaining units are LHS Silver level. These measure encourage diversity of housing occupancy by suiting a wide range of tenants with different mobility needs.

The proposed encourages social interaction of residents by providing communal open spaces of different types and sizes, facilitating a range of activities. Active and passive recreation spaces, landscaped spaces and ground floor spaces

**The proposed development is consistent with this principle**

### 3.10 principle 9: aesthetics

**Good design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure. Good design uses a variety of materials, colours and textures.**

**The visual appearance of a well designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.**

The proposed development has been designed to achieve a high quality, contemporary, visually engaging aesthetic appearance.

Elements contributing to the aesthetics of the proposed development include:

- using a variety of materials and textures including face brick, and metal detailing
- using a predominately 'light' coloured material palette
- providing contrasting material colours, including dark highlight elements
- a high level of articulation including, projecting balconies, building indentations and architectural roof elements
- careful composition of elements including treatment of windows, balconies, and balustrades
- incorporation and emphasis of vertical elements including stacked balconies, and building indentations
- incorporation and emphasis of horizontal elements including exposed slab edges, datum line and roof elements
- composition of horizontal and vertical elements to break up the building massing and volume and create a 'human scale'

The proposed development has been designed to contribute positively to the Gover Street and Trafalgar streetscapes and where visible from the public domain and from within communal areas. The development has been carefully considered to appear inviting, accessible, and activated on all facades.

**The proposed development is consistent with this principle.**

### 3. conclusion

As outlined above, the proposed development has been designed to be consistent with the design quality principles of State Environmental Planning Policy (Housing) 2021 – Chapter 4 Design of residential apartment and displays a high level of compliance with the provisions of the Apartment Design Guide.

The proposed development:

- achieves a high level of amenity for future residents
- addresses complex site and context conditions, including privacy and steep topography
- is of an appropriate density, bulk, and scale for the subject site, as described by the planning controls and supported by amenity outcomes
- does not result in unreasonable impacts on neighbouring properties
- provides appropriate housing for the area
- encourages social interaction between residents and creates a positive, healthy living environment
- is of a high quality contemporary and visually engaging design, contributing positively to the area and streetscapes

Additionally, the proposed development generally complies with the provisions of State Environmental Planning Policy (Housing) Chapter 2 Part 2 Division 1 In-fill affordable housing

The proposed development not only addresses its statutory obligations but will deliver a highly attractive, safe and vibrant place to live.

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