

PANEL REFERENCE	PPSHCC-335 - MA2024/00381 (PAN-482741)
LGA	Newcastle City Council
Proposal	Section 4.55(2) modification to DA2019/01169 for mixed use development, demolition of structures, erection of 14 storey mixed use including seniors living and aged care facilities - design changes to replace seniors living and aged care facilities with residential apartments
ADDRESS	124-126 Bull Street, Newcastle West (formerly known as 309 King Street, Newcastle West)
APPLICANT	GWH King Street Pty Ltd
OWNER	GWH King Street Pty Ltd
DATE OF LODGEMENT	5 November 2024
DOCUMENTS SUBMITTED FOR CONSIDERATION	<ul style="list-style-type: none"> • Attachment A - Response Letter prepared by Gyde • Attachment B - Fender Katsalidis Response Table • Attachment C - Part 1 - Solar Access Compliance Response prepared by Fender Katsalidis • Attachment D - Part 2 - Solar Access Compliance Response prepared by Fender Katsalidis • Attachment E - Part 3 - Solar Access Compliance Response prepared by Fender Katsalidis • Attachment F - Advisory Note prepared by the UDRP Chair • Attachment G - Amended Schedule of Conditions – changes shown in red • Attachment H - Amended Schedule of Conditions – clean set
RECOMMENDATION	Approval

This memo provides supplementary information for the proposed modification application (MA2024/00381) including background on the approval and application history and analysis relating to Part 4A - Solar and Daylight Access of the Apartment Design Guide (ADG).

City of Newcastle (CN) referred the modification application (MA2024/00381) to the Hunter Central Coast Regional Planning Panel (HCCRPP) for determination on 19 May 2025. CN submitted a Supplementary Memo to the HCCRPP on 15 May 2025 detailing design changes and analysis relating to Part 4A - Solar and Daylight Access of the Apartment Design Guide (ADG). The determination meeting focussed on the discrepancies in the solar access analysis discussed in the Supplementary Memo, waste management, consideration of substantially the same, parking provisions, communal open space and acoustic conditions. No determination was made at the meeting, and the application was deferred to a briefing on 21 May 2025.

On 21 May 2025, a subsequent HCCRPP meeting with CN officers considered the applicant's additional information provided on 20 May 2025. It focussed on disparities between the applicant's solar access analysis and CN's analysis, the application history and how the drafting error occurred.

On 28 May 2025, HCCRPP issued a Record of Deferral detailing additional information required from the applicant and analysis from CN. These matters are addressed in this memo which should be read in conjunction with CN's Assessment Report dated 12 May 2025 and the Supplementary Memo (15 May 2025) on the ADG Analysis and draft conditions.

Application History

On 9 March 2021, the HCCRPP approved the original DA (DA2019/01169) lodged on 6 November 2019. The approval comprised a mixed-use development involving the demolition of existing structures and the construction of two 14-storey mixed-use buildings above a shared basement car park and podium. The mixed-use development included seniors housing, shop top housing, a medical centre, and commercial / retail premises. At the time, the NSW Government Architect issued a design waiver for the proposal regarding clause 7.5 of the Newcastle Local Environmental Plan 2012 (NLEP2012).

On 3 April 2024, the HCCRPP approved a modification application (MA2023/00221) lodged 30 June 2023. The modification approved the addition of a level to Tower B, alterations to the mix of seniors housing and residential apartments, updates to landscaping, construction staging changes, and adjustments to the number of commercial tenancies. CN and UDRP assessed these applications with the HCCRPP the consent authority. The first modification was determined as continuing to exhibit design excellence under the original DA design waiver. The assessments relied on the architectural drawings' north point being accurate.

The current modification (MA2024/00381) assessment identified discrepancies in the solar access analysis, specifically its sun eye view diagrams showed inconsistencies compared with those submitted for original DA and the first modification.

Further investigation and clarification with the applicant confirmed the modelling data submitted for both previous applications were based on misconfigured ArchiCAD files and the north point required a 15 degree correction in an anti-clockwise direction. This was a subtle drafting error that is not easily discernible during the assessment process, particularly given all other documentation appeared consistent and professionally prepared. During assessment, it is not common practice to verify the orientation settings or embedded data within the CAD files unless there are clear inconsistencies or discrepancies in the submitted documentation.

This misalignment had not been detected during earlier assessments by CN, the UDRP, or the HCCRPP, that had all relied on the accuracy of the north point in the submitted documentation and there was no evident indication the orientation was incorrect. It is reasonable to rely on the submitted documentation as the 15 degree misalignment was not visually apparent in the plans. The misconfigured north point was recognised in the later stages of the current modification assessment and directly affects the solar access analysis and associated calculations presented in both approvals for the original DA and first modification.

A detailed explanation of how the modelling error was found during the current modification assessment is provided in **Table 1**.

Table 1 *Application history*

Date	Event	Comments
Modification Application (MA2024/00381)		
28 August 2024	UDRP pre-application review (UD2024/00429)	Among other matters, UDRP raised amenity concerns for apartments not receiving the minimum solar access required. The UDRP

		recommended the applicant address the ADG provisions in respect to solar access, cross ventilation and aspect.
9 September 2024	Pre-DA meeting	A pre-DA meeting discussed the proposed modification, matters raised included the additional level, traffic and access, waste management, building separation, gross floor area, deep soil, ADG compliance assessment requires, flooding and stormwater, public art and staging.
28 October 2024	UDRP pre-application review (UD2024/00429.01).	<p>Among other matters, UDRP raised solar access and stated:</p> <p><i>Apartment configuration has reduced compliance from 71% to 69% overall. The applicant argues that access to desirable outlook from south facing apartments in Tower A and the preference for larger apartments to the upper levels of Tower A as compensation for the reduction.</i></p> <p>and</p> <p><i>While noting incremental improvements that have been implemented since the previous presentation and the compliance or near compliance with some additional ADG recommended minimums has been indicated, for a large and relatively unconstrained, north-facing site, the levels of residential amenity achieved need to be reconciled against the need for design excellence to be demonstrated.</i></p> <p>UDRP stated the project must achieve demonstrated design excellence to avoid a design competition and take advantage of design excellence bonuses. UDRP recommended the applicant investigate greater solar access and residential amenity, noting previous comments had partially been responded to.</p>
5 November 2024	DA Lodgement	
18 December 2024	HCCRPP briefing	Amenity concerns specifically; cross ventilation raised.
29 January 2025	UDRP review - post lodgement (UD2024/00429.02).	<p>Among other matters, UDRP raised the configuration of internal corner apartments to improve amenity and recommended UDRP:</p> <p><i>an additional opening for natural light to the corridor to the South is still encouraged as well as the provision of seating areas within the Eastern corridors.</i></p> <p>And</p> <p><i>The applicant and design team are required to address the issues outlined above. This is important in ensuring that the design competition waiver, and design excellence bonuses can be supported. While useful progress has been made with previously identified issues, the Modification Application will require further review by the UDRP.</i></p>
6 March 2025	CN request for information (RFI) issued	<p>CN's RFI requested:</p> <ul style="list-style-type: none"> • Response to the UDRP meeting minutes. • Updates to architectural plans and documentation to include the correct GFA calculation. • Updated design statement. • Review of the waste management and servicing in accordance with previous comments.

		<ul style="list-style-type: none"> Clarification of the parking allocation.
26 March 2025	UDRP Review (UD2024/00429.03).	<p>UDRP stated:</p> <p><i>The UDRP supports the proposal in its current form. The panel advises that this is a well-considered and presented scheme and that the architectural, urban design and landscape is of a high standard.</i></p> <p>The application was not required to be referred back to the UDRP.</p>
4 April 2025	Applicant's response to RFI	<p>The applicant response to CN's RFI provided:</p> <ul style="list-style-type: none"> A written response to CN's RFI, UDRP meeting minutes, HCCRPP pre-briefing comments, development statistics Updated architectural drawings Updated design verification statement Updated operational waste management plan Supplementary parking assessment.
16 April 2025	CN RFI issued	<p>CN's RFI letter requested the following:</p> <ul style="list-style-type: none"> Updated documentation to reference correct site address. Updated architectural drawings including annotations, labelling, removal of redundant information. Confirmation of landscaping, deep soil and communal open space areas. Clarification of solar access analysis at half hourly / quarter hourly intervals as there was insufficient information to assess. The applicant was requested to provide accuracy on the 'Proposed Solar Access Diagrams' floor plans. Assessment of the previous modification application (MA2023/00221) found numerous applicant calculations errors for Tower B. Inaccurate information appears to be duplicated in the current set of drawings. Traffic Analysis Report for Tower A in relation to lift servicing. Response to the UDRP meeting minutes. Clarification of car parking and bicycle parking allocation. Confirmation of staging and stratum subdivision plan amendments. <p>A response was requested by 25 April 2025.</p>
28 April 2025	Applicant's response to RFIs	<p>The applicant submitted updated architectural drawings, lift analysis report, staging plan, subdivision plan and a written response to RFI 1 and 2. The updated architectural plans included sun eye view diagrams.</p> <p>The written response states:</p> <p><i>The architectural plans issued on the 24th April 2025 have been updated to address the additional information requested showing hourly 'point of view' drawings.</i></p> <p>and</p> <p><i>Due to the north – south orientation of building and apartments, the adjustments to Tower A do not alter the solar access numbers for Tower B. The shadows cast by Tower B have very little impacts on Tower A.</i></p>

2 May 2025	CN email to applicant	Following discussion with the applicant's planning consultant (Gyde), CN emailed the applicant noting the difference in the sun eye view angle between the proposed modification application and the previous modification application. There is a clear difference in what apartments receive the required solar access during the June 21 Winter Solstice.
5 May 2025	CN email to applicant	Follow up email sent to applicant requesting the updated architectural drawings and the solar access diagrams clarification.
7 May 2025	Applicant's RFI response	<p>Architectural drawings received. No response or updated sun eye view diagrams submitted in this package.</p> <p>Applicant called CN's Assessing Officer to explain the original DA and first modification application incorrectly applied the north point and found the sun eye view diagram was incorrectly drafted.</p> <p>Applicant requested a meeting with CN Officers to discuss the sun eye view diagrams.</p>
9 May 2025	CN and applicant meeting	<p>Meeting held with the applicant to discuss the differences between the sun eye view diagram for the current modification and first modification.</p> <p>The applicant provided updated solar access calculations for the original DA, the first modification and the current modification.</p> <p>The applicant and CN discussed potential amendments to improve amenity. CN's UDRP Chair was in attendance.</p>
12 May 2025	Applicant's RFI response	The applicant provided a written response and updated solar access analysis identifying the drafting error and the updated calculations for the current modification.
12 May 2025	CN Assessment Report submitted to HCCRPP	<p>Following the meeting with the applicant, discussions with the UDRP Chair, and a review of the applicant's RFI response, the Assessment Report and accompanying documents were submitted to the HCCRPP.</p> <p>Given the meeting timeframes and the consultation undertaken between all parties, it was considered this approach was appropriate, and the minor amendments to the design and solar access assessment could be suitably addressed through a Supplementary Memo.</p> <p>The assessment report was updated to identify the solar access assessment would be detailed in a separate supplementary memo.</p>
15 May 2025	CN Supplementary Memo submitted to HCCRPP	CN submitted a Supplementary Memo to the HCCRPP.
19 May 2025	HCCRPP Determination Meeting	The focus of the meeting was on the discrepancies in the solar access analysis, with some discussion on waste management, substantially the same, parking provision, communal open space and acoustic conditions. No determination was made on 19 May 2024.

20 May 2025	Applicant's response to HCCRPP comments	A further review of the non-compliance was undertaken by the applicant and additional information was received including updated Architectural Drawings, solar analysis assessment and supplementary sun eye view analysis.
21 May 2025	HCCRPP deliberation meeting with CN	Additional information was provided by the applicant, and the focus of the deliberation meeting was on the differences between the applicant's solar access analysis, the application history and how the drafting error occurred.
29 May 2025	Record of Deferral issued by HCCRPP	The HCCRPP issued a Record of Deferral dated 28 May 2025, requiring additional information to enable the application to progress.
29 May 2025	CN RFI issued	Following a review of the HCCRPP Record of Deferral an RFI was issued identifying what plans and documentation is required for CN to complete the assessment and report back to the HCCRPP.
6 June 2025	CN and applicant meeting	The applicant presented the supplementary solar access analysis to CN Officers and provided rationale as to how the calculations and assessment has come to be.
6 June 2025	Applicant response to CN RFI and HCCRPP deferral	The applicant submitted the supplementary solar access analysis via the Planning Portal.
19 June 2025	CN RFI Issued	CN reviewed documentation submitted on 6 June 2025 and issued an RFI identifying details to be included in the solar access analysis (i.e. the full extent of the West's Club) and additional analysis for specific apartments to clarify discrepancies between CNs calculations and the submitted documents.
25 June 2025	Application response to CN RFI and HCCRPP deferral	The applicant submitted the supplementary solar access analysis via the Planning Portal. The analysis is the subject of this assessment.

Design Changes

Since lodgement of the application and as part of an ongoing review of the solar access non-compliance, design amendments have been made to improve sunlight to east facing apartments on Tower B and to Level 14 apartments on Towers A and B.

To the eastern façade of Tower B, the design changes include reducing the width of the air conditioning plant enclosures on each balcony by 450mm. This improves sunlight penetration into the bedrooms and living areas as shown below in **Figure 1** and in Part 3 Solar Analysis prepared by FK at **Attachment E**.

Previously submitted solar access analysis for Level 15 identified skylights to both towers ensuring all Level 14 apartments receive a minimum of 2 hours of solar access.

The proposal was revised following CN's concerns regarding the construction, placement, and effectiveness of skylights within rooftop communal open space areas. The amended design now incorporates voids within the existing parapet profile to enhance sunlight for three apartments on the eastern façade of Tower A and four apartments on the eastern façade of Tower B. In addition, two skylights are proposed for south-facing apartments in Tower A. These skylights are not within the

communal open space areas. The proposed design amendment is shown at **Figure 2** and in Part 3 Solar Analysis at **Attachment E**.

These design changes do not alter the approved built form, separation distances or quantum of communal open space on the rooftop.

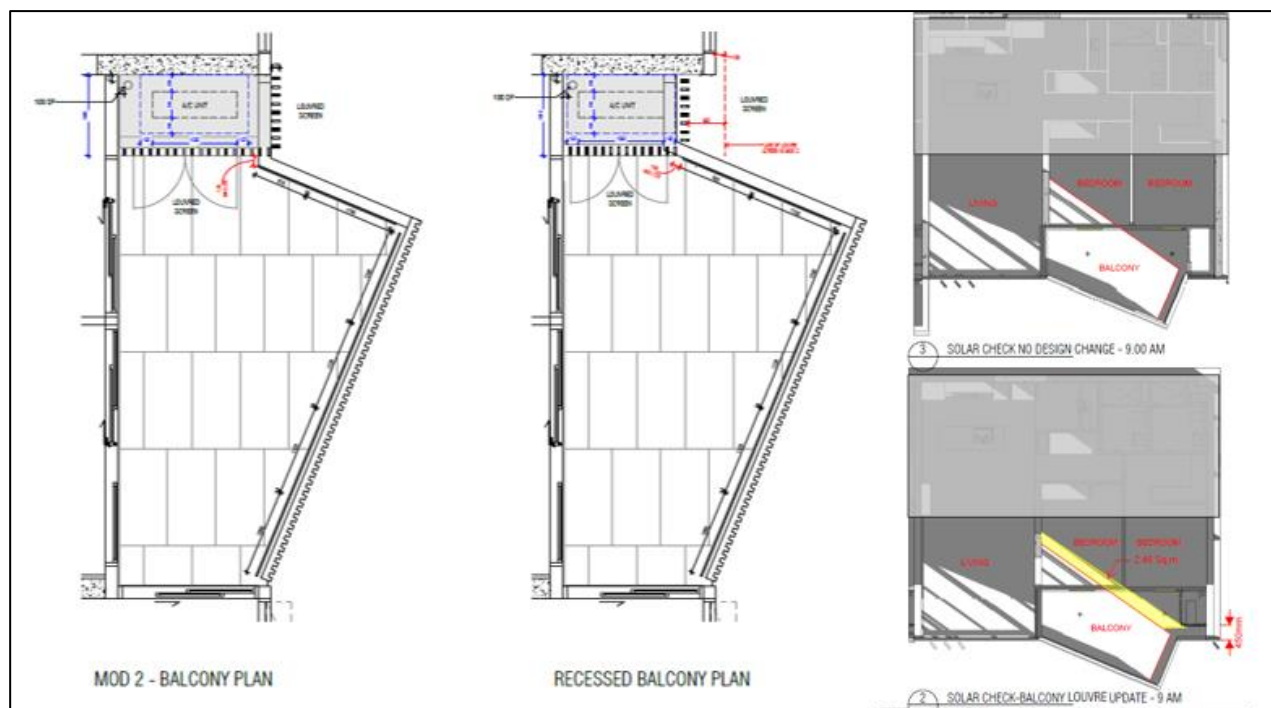


Figure 1 Comparison of proposed balcony plan and amendments (left) and resultant solar analysis at 9am (right)

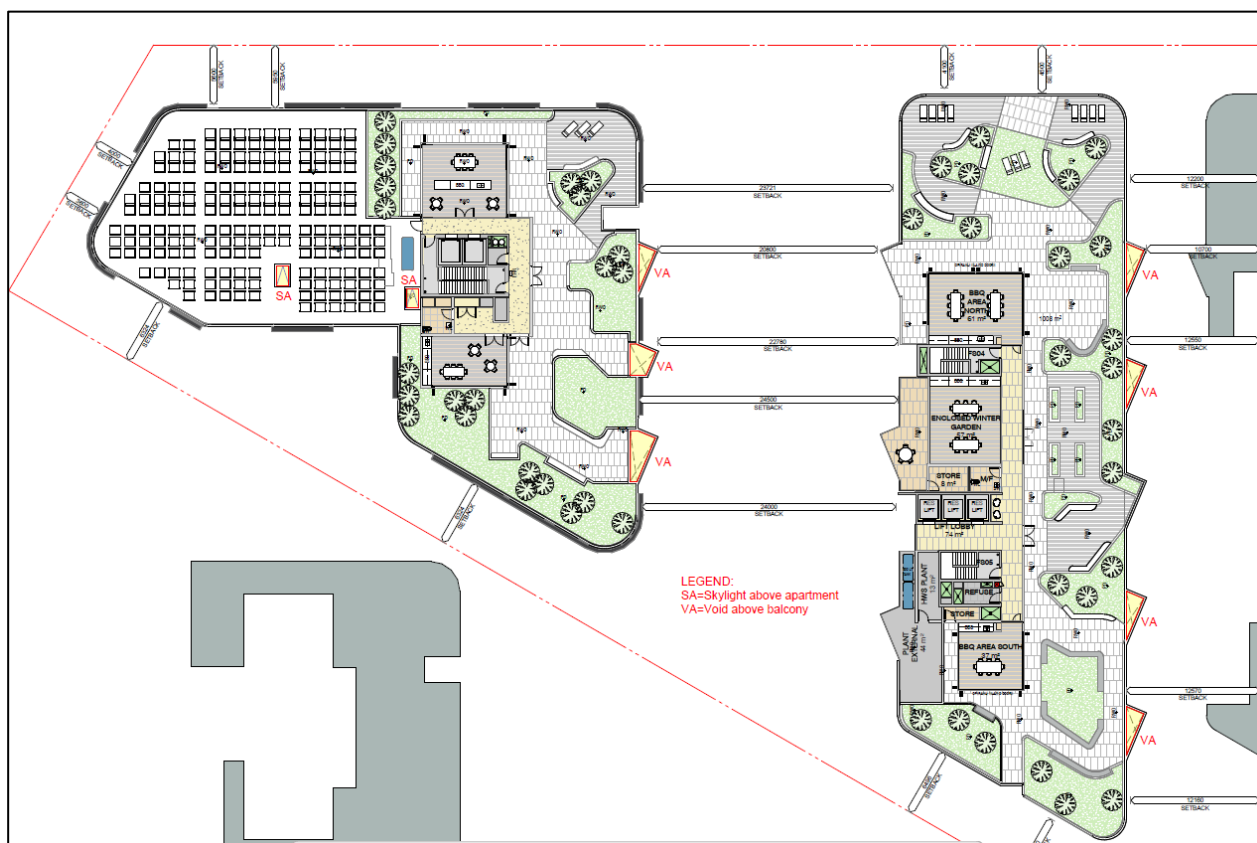


Figure 2 Proposed location of skylights and voids within existing parapets to filter light to Level 14 apartments

Analysis of Solar Access

On 6 June 2025, the applicant submitted additional architectural analysis. CN's review led to a RFI issued on 19 June 2025, and a meeting held on 20 June 2025 to discuss issues raised. The RFI identified:

- Omission of modelling for the Wests Club in both the first and current modification
- Discrepancies in solar access for east-facing apartments in Tower B between the first and current modifications
- Omission of apartment numbers in submitted documentation
- Clarification of solar access for certain apartments, particularly where CN's calculations differ from those submitted. This includes areas where potential overshadowing from the Wests Club and Tower A may impact sunlight access.

On 25 June 2025, the applicant responded to the RFI. The FK Response Table (**Attachment B**) outlines the methodology adopted and provides a discussion of the calculations to address CN concerns regarding the solar calculations for specific apartments. Internal 3D modelling has also been undertaken for typical apartments to demonstrate the accuracy of the calculations.

The revised analysis assesses solar access to both living rooms and balconies for the original DA, the first modification, and the current modification. The results are categorised by duration of solar access: more than 2 hours, 1 hour 45 minutes, 1 hour 30 minutes, and 0 hours. As detailed in Part 1 and Part 3 of the Solar Analysis at **Attachment C** and **Attachment E**, the sunlight has been calculated using a minimum of 1m² of direct sunlight received at 1m above the floor level, at 15minute intervals.

For discrepancies found between CN's and the applicant's calculations, the applicant's additional information included further analysis and verification of calculations through 3D modelling views for typical apartments. This analysis confirms:

- The modelling of the Wests Club in the first modification and current modification were based on survey information with simplistic massing of the building and omitted the roof element. When modelled in the updated analysis, this has little impact on the overall compliance as the living areas on the east facing apartments on the Lower Levels of Tower B were not assessed as having 2 hours of sunlight and the updated analysis demonstrates:
 - In the original DA on Level 1, 5 apartments achieve 1 hour and 45 minutes, 3 achieve 1 hour and 30 minutes and 3 achieve <1 hour 30 minutes to the living rooms.
 - In the original DA on Level 2, all east facing apartments achieve 1 hour 45 minutes to the living rooms.
 - In the first modification on Level 1 and Level 2, all apartments achieve 1 hour and 30 minutes to the living rooms.
 - In the current modification on Level 1 all apartments achieve <1 hour and 30 minutes and on Level 2, four apartments achieve 1 hour and 45 minutes and one apartment achieves <1 hour 30 minutes.

Current Wests Club modelling shown in Part 2 Solar Analysis at **Attachment D** demonstrates this.

- For the south-western apartments of Tower B, FK demonstrate solar access is achieved with sunlight passing through the bedroom glazing on the façade and into the living room at the back of the balcony. This is illustrated in the 3D analysis where it shows the living room window behind the bedroom window (dashed red). This arrangement applies to various apartments on the south-western interface of Tower B. However, these apartments receive less than 2 hours sunlight and therefore the overall percentage is not impacted.

Updated calculations for living areas and balconies across the original DA, first modification and current modification are provided in **Table 2**.

Table 2 June 21 solar access assessment

Application	>2 hours	1 hour 45 minutes	1 hour 30 minutes	0 hours
Living Rooms				
Original DA	36%	39%	7%	14%
First Modification	46%	4%	32%	13%
Current Modification	40%	20%	18%	12%
Balconies				
Original DA	77%	1%	2%	13%
First Modification	85%	4%	1%	7%
Current Modification	77%	4%	1%	14%

**Note: the original DA and first modification included seniors housing (independent living units (ILUs) and a residential care facility (RCF)) in Tower A. The ADG does not apply to RCF rooms.*

CN's assessment determined the extent of solar access (minimum 2 hours on June 21) to living areas and balconies across Towers A and B as follows:

- The number of apartments receiving compliant solar access under the original DA was **89**, representing **35.9%** of the 248 apartments.

- The number of apartments receiving compliant solar access under the first modification application was **119**, representing **45.9%** of the 259 apartments.
- The number of apartments receiving compliant solar access under the current modification is **112**, representing **40%** of the 280 apartments.

These calculations were also confirmed by the applicant.

The first modification had improved solar access to both living areas and balconies as the Independent Living Units for the seniors housing had a greater quantity given the smaller unit size. Regardless, the current modification improves on the solar access received to living rooms from that approved under the original DA and retains the 77% of solar access received to balconies in mid-winter. The current modification has improved solar access compared to the original DA, increasing compliant apartments by 5%.

The supplementary sun eye view analysis and assessment prepared by FK sufficiently addresses the ADG Objective 4A-1 and despite the numerical non-compliance, the current modification demonstrates that apartments will achieve adequate amenity during the June 21 winter solstice as:

- The number of apartments receiving solar access to the private open space on the eastern façade of Tower B is optimised in the current modification compared to the original DA through an increase in balcony sizes and adjustments made to the AC plant enclosures. This allows for improved amenity and useability of the private open space areas for each apartment.
- The number of apartments receiving solar access to the living rooms is optimised in the current modification compared to the first modification where the privacy louvres on east facing apartments have been changed from perpendicular to the façade to being angled toward the sun. The spacing of the louvres has also increased.
- The number of apartments receiving solar access to their living areas on Level 14 is optimised through the reinstatement of two skylights and the provision of seven voids in the existing parapet of the roof form to enable sunlight to penetrate to the apartments below. This design measure does not alter the overall built form or quantum of communal open space and rather allows for 2 hours of sunlight to 19 out of the 20 apartments across Tower A and Tower B.
- The site layout and floor plate design provide district views for south-facing apartments that do not meet the 2 hour solar access requirement. The proposal optimises the placement of communal open space to ensure it receives ample sunlight, enhancing usability and amenity throughout the year.

When considering the orientation of the site with dual street frontages, significant views to the south and development along the eastern boundary, the current modification continues to optimise amenity for apartments and those which receive sunlight to habitable rooms, primary windows and private open space. As the ADG is a performance-based criteria, the proposal meets the objective of the provision, and the proposed modification complies with the design guidance notwithstanding the numerical non-compliance.

Options Analysis

Noting the HCCRPPs comments on the site being a "relatively unconstrained corner site that has limited development scale proximate to it" the applicant provided options analyses of potential massing considered in the pre-DA meeting held in 2018 by FK shown in **Figure 3** below. The applicant states:

"architectural massing at concept design stage considered orientation to local streets, the relationship of the towers to street level experience, enhancement of amenity, protection from winds and solar access."

The applicant states if the correct solar angle had been known in the early design phase for the original DA, the eastern facades may have been rotated to optimise solar access, however this would have created an awkward alignment between the towers, podium levels and the relationship with the public domain and surrounding streets.

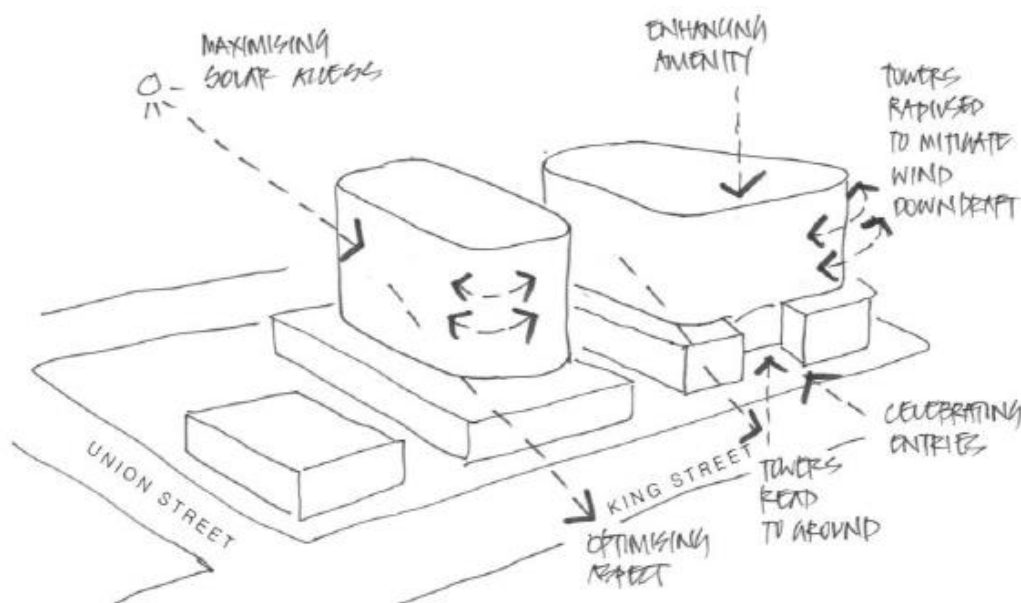


Figure 3 2018 concept design phase site massing prepared by FK

The UDRP Chair assessed the site arrangement detailed in **Attachment F** and found the layout, orientation and apartment design exhibit design excellence and achieve appropriate amenity notwithstanding the numerical non-compliance with objective 4A-1 of the ADG. In summary:

- Although the site can be described as a “corner site”, it becomes progressively deeper from west to east, and its common eastern boundary with West’s Club is substantial in length. It has a very short north-western frontage to Ravenshaw Street where only one apartment per floor of Tower A can obtain winter solar access, to King Street, excellent northern solar exposure can be achieved, and to Bull Street, no winter sun is received. As such, the site does not significantly benefit from solar access arising from its corner location.
- CN's former Urban Design Consultative Group provided advice across multiple presentations to the original applicant (West's Club) from the Pre-DA stage to the original DA. More recently, the UDRP made recommendations for amendments to the proposal for improved apartment amenity and expansion of internal and outdoor communal space to provide amenity for all residents. These recommendations have been incorporated in the current design.
- A particular focus of the UDRP has been on providing attractive, comfortable spaces with good winter solar access, for all residents. The level of residential amenity provided to the apartments, though falling short of the ADG recommended minimum for living rooms, is reasonable. This is due to the level of amenity achieved to communal areas as well as to private open space, where balconies are well protected from wind and which fully meet the percentages recommended for solar access in accordance with the ADG.

- The error identified by the applicant's consultants in respect to the 15 degree misorientation of the north point of the site, has been shown to be the prime cause of the reduced percentage of apartments achieving 2 hours of winter sun to Living Room spaces. These apartments are located on the eastern side of Block B. However, the level of residential amenity though falling short of the ADG recommended minimum, is reasonable as a total of 220 apartments (78%) receive between 1 hour and 30 minutes to 2 hours of solar access to living rooms in mid-winter. This outcome falls just 30 minutes short of full compliance for a portion of dwellings, which is not considered to result in a significant adverse impact on amenity. Importantly, the private open space (balconies) performance exceeds the ADG requirements, with 77% of apartments achieving the 2 hour solar access benchmark, further supporting the overall adequacy of solar access provided across the development.

The UDRP Chair confirms the additional analysis is comprehensive, and the methodologies adopted are appropriate for the purposes of determining amenity levels across the proposed apartments. As such, the proposal continues to exhibit design excellence, notwithstanding the numerical non-compliance. Further discussion is provided in **Attachment F**.

Revisions to Conditions

Following a review of the Schedule of Conditions, the following updates have been made:

- Condition 1:
 - Replaced previous view from the sun diagrams with updated plans for the current modification (DA557-DA563).
 - Removed sun eye view check SK558-SK563 as these are not required as part of the approved plans and can be replaced by the view from the sun diagrams.
- Condition 1A:
 - Amended to remove wording "Phase 3 is subject to the completion of Phase 2" to enable commencement of the eastern tower while the podium construction is finishing.
- Condition 3:
 - Amended due to miscalculation of s7.12 development contributions.

The updated Schedule of Conditions and the Council Assessment Report are included at **Attachment G** and **Attachment H**.

Conclusion

This Supplementary Memo, combined with the revisions to the Schedule of Conditions and Fender Katsalidis' additional analysis comprehensively address the historical approvals and ADG (Objective 4A). The recommendation to approve MA2024/00381 should be supported based on CN's Assessment Report dated 12 May 2025, the previous Supplementary Memo relating to the additional ADG Analysis and draft conditions and the supporting assessment under this Supplementary Memo.

It is acknowledged the issue with the north point was a complex technical matter that could not have been reasonably identified earlier by CN staff, the UDRP, or the HCCRPP and its resolution required detailed analysis by the applicant's architect. Notwithstanding this late clarification, the design outcome remains consistent with the originally intended high-quality built form.

As detailed in this further Supplementary Memo, the proposed modification has been assessed as achieving design excellence. While solar access falls marginally short of the ADG's mid-winter

recommendation, the level of residential amenity is considered reasonable given 78% of living rooms receive between 1 hour and 30 minutes and 2 hours of solar access. In addition, compliance with private open space requirements further supports the overall adequacy of solar access provided across the development, where 77% of balconies achieve 2 hours solar access in mid-winter. Having regard to the site's context, orientation, layout and design, Objective 4A-1 of the ADG has been appropriately satisfied.

Should you require any further information on this matter please contact Eliza Arnott, Principal Development Officer (Concierge) on (02) 4974 1343.

Eliza Arnott
Principal Development Officer (Concierge)