State Environmental Planning Policy No 65 (SEPP 65)
Design Verification Compliance Review

7 - 13 Bellevue Road, 2 Benney Avenue and 38 - 40 Princess Highway, Fig Tree (Site Area 13,577.4m²)

1. Proposal

The proposal is for a mixed-use complex of 4 buildings that are:

- a new Residential Aged Care Facility (RACF);
- **a new Independent Living Unit (ILU) Building - SEPP 65 applies to the ILU building only;**
- retained Croatian Catholic Church; and
- retained community hall.

These buildings comprise:

- 102 beds in the Residential Care Facility;
- **22 Independent Living Units;**
- Existing Croatian Church and Community Hall;
- A new community public square;
- 145 on-site parking spaces; and
- Various ancillary uses such as a gym, wellness centre, club house, café, chapel, Seniors Day Care Centre, Mens' Shed, multipurpose cinema room.

Apartment Mix/Independent Living Units

- **1 Bedroom – 9 (40%)**
- **2 Bedroom – 2 (10%)**
- **3 Bedroom – 11 (50%)**

Total – 22

Architect – Alastair MacCallum [Nominated Architect No. ACT #1002]

This Review provides for a consideration of the above development under the 9 design quality principles of SEPP 65, the relevant provisions of the Apartment Design Guide and provides a Design Verification Statement from the project's nominated architect.

2. SEPP 65 PRINCIPLES

Part 2 of SEPP 65 provides for the following 9 design quality principles that are required to be considered when assessing development application (DAs) for SEPP 65 affected residential flat building, shop top housing or mixed-use development with a residential accommodation component. In this instance the principles apply to the residential component of the proposed mixed-use building. These principles are found at Clauses 9 – 18 of Part 2 of the SEPP.

The following table assesses the proposal against the 9 design quality principles of SEPP 65.

Principle	Compliance
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.	The site is situated adjacent to the Figtree commercial area centre on the corner of Bellevue Road and the Princess Highway. The land uses and subdivision pattern of the subject site are already distinct to the adjoining residential area in as much as the lots are larger and used for predominately non-residential purposes. The subject site already performs a transitionary role in terms of land use and the scale of buildings to that in the adjoining low and medium density residential areas. The proposal will consolidate the transitory role that the site currently performs, with a well-planned urban scheme that provides for residential care and seniors housing that is much in demand in this locality.
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 scale of the new building is 2 to 4-storeys. To the site edges, the adjoining residential land has a single to 2-storey to the adjoining commercially zoned land the existing buildings are single to 2-storey. The planning controls for the adjoining commercial land provide for an 11m building height control that envisages a 3-storey scale. 6m+ side setbacks are proposed to all site boundaries. The adjoining residential building generally provide more traditions 1m to 1.5m side setbacks. The transition in scale between the adjoining suburban and proposed urban building is well mediated by increased setbacks and at most the increase in building scale is 3-storeys. This type of scale is also reasonable noting local planning controls envisage higher building forms around the Figtree commercial centre. The building forms would be characterised as mid-rise and are appropriate and well managed in their context.

Principle	Compliance
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.	A mixed-use scheme is proposed with a FSR of 0.9:1 or GFA of 12210.4m². As discussed, the development is urban and its scale mid-rise. The actual density of the ILUs is 22% of total site floor space – see breakdown below. **Use** **% Site GFA** ILU 22% RACF 61% Church & Hall 17% The SEPP 65 affected part of this development is in effect 22 units surrounded by support and community facilities, adjacent to a local commercial centre and high frequency bus routes. The form of density proposed is aged housing which addresses existing and forecast demand. The site density proposed is the right kind in the right place.
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 development is BASIX and SEPP 65 compliant in terms of the relevant ESD provisions (e.g., solar access and cross ventilation).
Principle 5: Landscape	A comprehensive site landscape scheme is proposed that provides for: • Naturalisation of the existing drained watercourse across the site; • Retention of various significant trees; • A new public square; and • Various through site links through the site to its street frontages. The new public square will also receive continuous sun mid-winter and substantial deep soil setback areas are provided between new buildings and the adjoining lower density suburban areas.

Principle	Compliance
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 useability, privacy and opportunities for social interaction, equitable access, respect for neighbours' amenity and provides for practical establishment and long-term management.	
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 well-being. 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.	This development seeks to bring the city-building heritage of the Croatian community to Figtree. The development is built around a public square focussed on the existing Croatian Catholic Church and Community Hall. Around this square are various community uses such as a gym, wellness centre seniors' day care centre, men's shed and café. The adjoining building forms are dramatic, well-articulated and varied in form and materials and seek to create an intimate European 'old-city' feel to this development.
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 main entry to the ILU building is off Bellevue Road and secondary entries off the public square. All entries will be well lit and observed.
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.	A mix of studio, 1 bedroom, 2 bedroom and 3-bedroom units are proposed. There are a variety of floor plans provided within the building. The housing and other facilities within the development are provided to address the demand for such in an aging community. There is existing and forecast need for the housing proposed. All the housing proposed is adaptable and suitable for an aging population.

Principle	Compliance
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 development contains 4 district buildings, each is detached and has its own character, purpose and is connected via the public square and landscape treatments proposed. The new Independent Living Unit Building is the SEPP 65 affected building (residential units). As noted, the proposal is proposed by the Croatian community and seeks to retain their site heritage and develop a European urban aesthetic to the place. This is achieved via retention of the church and hall and giving the existing Church building prominence in the Bellevue Road Street streetscape and within the development in general. The main street façade of the ILU building is stepped (2-storey to the street) and uses a light Morada Splits (bianco) brick. The colour and form of these bricks are subservient and respectful of the existing Church building, that is also a light brick. Darker bricks are used to the mid-sections of the ILU and RACF buildings to modulate the materials of the new building forms and provide relief and highlight the church building. The ILU building provides for symmetrical fenestration and a dominance of masonry to its external facades. Longitudinally the ILU building is broken down into 3 bays, demarcated on entries off the public square side of the building. A horizontal masonry parapet if provided with more dramatic skillion style parapets to the front and rear. The above design themes are repeated in the RACF. The proposed ILU is a well-mannered and orderly urban building that seeks to fit into its existing context and will sit well next to the existing Church and new public space.

3. Apartment Design Guide

The table below provides an analysis of the proposed development against the Part 3 and Part 4 Objectives and Design Guidance matters in the SEPP 65 Apartment Design Guideline. The responses have been prepared by the project Architect AMC Architecture who are ACT and NSW registered architects along with DSB Landscape Architects with the corresponding landscape drawings prepared by a registered Landscape Architects.

The information provided in the table below is in addition to the detailed drawings submitted with the DA. Further commentary is also provided on the proposed development in the supporting Statement of Environmental Effects.

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Part 3 Siting the Development		
3A Site Analysis		
Objective 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. **Design Guidance** Each element in the Site Analysis Checklist should be addressed.	The site survey and site analysis plan submitted with the DA submission addresses the potential opportunities and constraints of the site. In addition, the Statement of Environmental Effects (**SEE**) also provides an analysis of the site location and context having regard to surrounding development and relevant planning considerations.	**YES**
3B Orientation		
Objective 3B-1 Building types and layouts respond to the streetscape and site while optimising solar access within the development. **Design guidance** • Buildings along the street frontage define the street, by facing it and incorporating direct access from the street (see figure 3B.1) • Where the street frontage is to the east or west, rear buildings should be orientated to the north. • Where the street frontage is to the north or south, overshadowing to the south should be minimised and buildings behind the street frontage should be orientated to the east and west (see figure 3B.2)	The proposal has been designed to address all street frontages but in particular Bellevue Road as the primary address to the development. The other site street frontages were not suitable as the 'address' for the project because: • The Benny Avenue frontage is narrow and adjoined by one and two-storey dwelling houses and town houses. This side of the site has a low scale domestic character. • The Princess Highway address is the flood and noise affected part of the site. This part of the site has poor amenity for residential development and is also retained as open for flood management. Notwithstanding this, each street address benefits from a dedicated pedestrian path network with integrated landscaping and lighting and an entry portico. The primary address of the proposed redevelopment is orientated towards the northeast and adjoins community facilities built by the Croatian community. The new development benefits from an address long established by the existing Mary Queen of Croats Church and Hall.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
	The proposal retains and enhances the existing sense of address created by the Church and Hall, with comprehensive landscaping, a new high-quality Independent Living Building to Bellevue Road and most importantly a public square behind the Church and Hall between the new RACF building. Within the site itself the primary address of the proposed Residential Care Facility (RACF) is orientated north ensuring excellent solar access. The new public square is an enclosed space that will receive continuous mid-winter solar access via: • early to mid-morning sun from the gaps between the existing Hall, Church and Independent Living Unit building. • Sun in its southern corner over the lower Church and Hall buildings midday. • Sun through the northwest gap between the RACF and ILU building (midday to early afternoon). The public square will have excellent solar access. There are common pedestrian access points evenly distributed to the surrounding street network giving direct access to the Village / Public Square, also known as a TRG in Croatian.	
Objective 3B-2 Overshadowing of neighbouring properties is minimised during mid-winter **Design guidance** • Living areas, private open space and communal open space should receive solar access in accordance with sections 3D Communal and public open space and 4A Solar and daylight access • Solar access to living rooms, balconies and private open spaces of neighbours should be considered • Where an adjoining property does not currently receive the required hours of solar access, the proposed building ensures solar access to neighbouring properties is not reduced by more than 20%	The masterplan design concept has been developed through rigorous site and opportunities/constraints analysis informed by the Adria Care brief. Key to this is the proposed new Adria Care Village being part of the Figtree community and implied therein is a respect for all adjoining neighbours. In this regard, and given the site configuration and orientation, the primary potential impact is on those residences to the South-West of the proposed development site on Benny Avenue. The RACF has therefore been carefully designed to minimise overshadowing impacts on those adjoining properties to the south through: • A stepped approach to the building form / height from the high to the low side of the site; • Significant setbacks that range from 6.4m to 16.2m to the Southern boundary; and • An articulated floor plan arrangement that pulls the main bulk of the building away from the southern boundary.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• If the proposal will significantly reduce the solar access of neighbours, building separation should be increased beyond minimums contained in section 3F Visual privacy • Overshadowing should be minimised to the south or down hill by increased upper level setbacks • It is optimal to orientate buildings at 90 degrees to the boundary with neighbouring properties to minimise overshadowing and privacy impacts, particularly where minimum setbacks are used and where buildings are higher than the adjoining development • A minimum of 4 hours of solar access should be retained to solar collectors on neighbouring buildings	Looking specifically to impacts on adjoining properties, and with reference to DA-0-910 we note the following: • Any overshadowing impacts of adjoining residences are limited to the Winter Solstice between 9am and 10am ensuring a minimum of 5 hours of uncompromised solar access; and • Any overshadowing impacts of the adjoining residence garden areas are limited in the Winter Solstice between 9 am – and approximately 1pm noting that each received more than 50% solar access between 11.30 and 3pm on what are substantial rear garden areas where the shadow quickly pulls away from the immediate residence area.	
3C Public domain interface		
Objective 3C-1 Transition between private and public domain is achieved without compromising safety and security **Design guidance** • Terraces, balconies and courtyard apartments should have direct street entry, where appropriate • Changes in level between private terraces, front gardens and dwelling entries above the street level provide surveillance and improve visual privacy for ground level dwellings (see figure 3C.1) • Upper level balconies and windows should overlook the public domain • Front fences and walls along street frontages should use visually permeable materials and treatments. The height of solid fences or walls should be limited to 1m • Length of solid walls should be limited along street frontages • Opportunities should be provided for casual interaction between residents and the public domain. Design solutions may include seating at building entries, near letter boxes and in private courtyards adjacent to streets	The proposed Adria Care Village in Figtree will include a variety of accommodation options for older Australians including Independent Living Units (ILU's), RACF Units and Respite Units. The RACF units are by necessity accessed from a controlled entry point to the building although there are some ground level units to the ground floor of the Eastern end of the building which may be suitable for short term respite care noting these are elevated above the public realm. In terms of ILU Apartment Building, which fronts Bellevue Road, we note the following: • The site is an unusual amalgamation of blocks resulting in an L-Shaped Configuration • The Adria Care brief required that the RACF be central to the integrated redevelopment fronting the Public Square and that the ILU's have a clear street address to Bellevue Street • The ILU Apartment building sits on a narrow portion of the site such that the street address / frontage is limited • The ILU Apartment building is a linear arrangement broken into 2 cores • These cores are addressed off a new pedestrian walkway which links Bellevue Street to the Public Square with a clear address for each while the front core also has an address directly off the Bellevue Street	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• In developments with multiple buildings and/or entries, pedestrian entries and spaces associated with individual buildings/entries should be differentiated to improve legibility for residents, using a number of the following design solutions: • architectural detailing • changes in materials • plant species • colours • Opportunities for people to be concealed should be minimised	• Both entries to the ILU Apartment building are differentiated from the other in terms of proximity to the street, clear delineation from the internal access path and the detailed resolution including architectural detailing, materiality, colour and plant species • ILU entries are located off the main internal pedestrian path contributing to a sense of community and a transition between public and private areas • There are 2 ILU units which address Bellevue Street with elevated terraces and extensive glazed sections which look over/ onto the street at Ground and all upper levels • The main pedestrian path which links Bellevue Street to the central Public Square allows for casual interaction along its length be that linking to the: ➢ Mary Queen of Croats Church and Hall ➢ The entries to the ILU Apartment building ➢ The Parish office under the rear of the Church ➢ The Adria Care Clubroom at the lower level of the ILU Apartment Block ➢ The Village Square ➢ The RACF with its many facilities and functions at Ground Level including a Hall, Chapel, Men's Shed, Clubroom, Wellness Services and the like • Many of the upper floor living area and balconies overlook the street and central Public Square / communal area to provide surveillance.	
Objective 3C-2 Amenity of the public domain is retained and enhanced. **Design guidance** • Planting softens the edges of any raised terraces to the street, for example above sub-basement car parking • Mail boxes should be located in lobbies, perpendicular to the street alignment or integrated into front fences where individual street entries are provided • The visual prominence of underground car park vents should be minimised and located at a low level where possible • Substations, pump rooms, garbage storage areas and other service requirements should be located in basement car parks or out of view	The design concept for Adria Care Retirement Village seeks to build a new community around the existing Croatian Church and Hall. This has logically resulted in a Public square to the rear of the Church which is a focal point for the development as a whole with excellent solar access and an interesting contained/urban character accommodating for a flexible range of uses for all stakeholders. This is a carefully considered shared zoned in which: • The visual prominence of underground car park vents is minimised and located at a low level where possible • Substations, pump rooms, garbage storage areas and other service requirements do not compromise from the look and feel of the space and are rather located in basement car parks or out of view • Ramping for accessibility are minimised by building entry location and setting ground floor levels in relation to footpath levels • Durable, graffiti resistant and easily cleanable materials are proposed	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance

• Ramping for accessibility should be minimised by building entry location and setting ground floor levels in relation to footpath levels
• Durable, graffiti resistant and easily cleanable materials should be used
• Where development adjoins public parks, open space or bushland, the design positively addresses this interface and uses a number of the following design solutions:
  • street access, pedestrian paths and building entries which are clearly defined
  • paths, low fences and planting that clearly delineate between communal/private open space and the adjoining public open space
  • minimal use of blank walls, fences and ground level parking
• On sloping sites protrusion of car parking above ground level should be minimised by using split levels to step underground car parking
	Moreover:
	• Planting softens the edges of any raised terraces to the street, for example above sub-basement car parking
	• A variety of through site links from Bellevue Road to the site's other frontages are proposed.
	• This is scheme that is very public and permeable for pedestrians.
	• Car parking has been hidden underground, any exposed sections of the basement have been disguised with landscaped stone retaining walls (along McFarlane Ave) or screen fin walls (along the northern pedestrian public path) As a sloping site any protrusion of car parking above ground level has been minimised by using split levels to step underground car parking and with landscaped stone retaining walls or screen fin
	• Mailboxes are located within the formal gateway structures, perpendicular to the street alignment	

3D Communal and public open space		
Objective 3D-1 An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping **Design criteria** 1. Communal open space has a minimum area equal to 25% of the site (see figure 3D.3) 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)	The development proposal includes a main Public Square which has an urban / European character (TRG) as well as a Park towards the east of the site including a children's playground area totalling 2,200m². The Public Square is surrounded by active frontages and community uses including a clubroom, meeting rooms, men's shed, wellness facilities, community hall, parish Hall and building entries to the RACF and ILU's. Over and above this the development concept includes a roof top garden area associated with the upper level of the RACF which has a clinical benefit for those suffering from dementia. This has a total area of 1,200m² All these areas receive a minimum of 50% direct sunlight to the principal communal open space for a minimum of 2 hours. The total area of these 4 community spaces is 3,400m² which exceeds the required 25 % of the overall site.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Design guidance • Communal open space should be consolidated into a well designed, easily identified and usable area • Communal open space should have a minimum dimension of 3m, and larger developments should consider greater dimensions • Communal open space should be co-located with deep soil areas • Direct, equitable access should be provided to communal open space areas from common circulation areas, entries and lobbies • Where communal open space cannot be provided at ground level, it should be provided on a podium or roof • Where developments are unable to achieve the design criteria, such as on small lots, sites within business zones, or in a dense urban area, they should: • provide communal spaces elsewhere such as a landscaped roof top terrace or a common room • provide larger balconies or increased private open space for apartments • demonstrate good proximity to public open space and facilities and/or provide contributions to public open space	The proposed Public Square is the key focal point of the proposed redevelopment servicing the needs of the RACF and the ILU Apartment residents while being a flexible space for use by the Croatian Community and broader Wollongong community. The space has been carefully designed to be a multi-purpose useable area. It has a minimum dimension of 22m and is an urban space in keeping with Croatian Village Squares and will also include tree plantings, elevated planter beds and potted plants. It is central to the development with excellent linkages to all adjoining streets and the Figtree Shops. This Public Square is augmented by a green park area to the east of the site including a children's / adult playground area and a rooftop garden on top of the RACF specifically designed for those suffering from dementia to enjoy the outdoors safely and comfortably.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance

Objective 3D-2
Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting
Design guidance
• Facilities are provided within communal open spaces and common spaces for a range of age groups (see also 4F Common circulation and spaces), incorporating some of the following elements:
  • seating for individuals or groups
  • barbecue areas
  • play equipment or play areas
  • swimming pools, gyms, tennis courts or common rooms
• The location of facilities responds to microclimate and site conditions with access to sun in winter, shade in summer and shelter from strong winds and down drafts
• Visual impacts of services should be minimised, including location of ventilation duct outlets from basement car parks, electrical substations and detention tanks
	The 3 main communal open spaces associated with this development are designed to allow for a range of activities including:
	• Seating areas for individuals through to larger groups
	• Children's play areas
	• Adult play / exercise areas including dedicated areas for games like Boce
	• Garden areas for enjoyment or to grow fruit and vegetables
	• Dementia gardens to allow residents to enjoy an outdoor experience
	• Larger gathering areas for functions / community groups
	• BBQ areas
	Each of these facilities are located to respond to site conditions on building design including solar access, micro-climate, flood zone, acoustic considerations, existing trees, required vehicle movement, carparking and pedestrian desire lines, access from basement parking areas, proposed community uses in and around these public spaces.
		YES

Objective 3D-3
Communal open space is designed to maximise safety
Design guidance
• Communal open space and the public domain should be readily visible from habitable rooms and private open space areas while maintaining visual privacy. Design solutions may include:
  • bay windows
  • corner windows
  • balconies
• Communal open space should be well lit
• Where communal open space/facilities are provided for children and young people they are safe and contained
	Ground level communal open spaces and associated public domain are located such that there is natural surveillance from both public and private spaces. Of particular consideration:
	• The Public Square is overlooked by the RACF, Clubroom, Seniors Day Centre, upper-level lounge areas and a range of community uses in the ILU Apartment building and Church including the Croatian Community Room and Parish Office
	• The park area to the east is overlooked by 3 levels of RACF Bedrooms
	• The upper-level roof terrace is a controlled space where people movement can be managed and monitored by Adria Care
		YES

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 3D-4 Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood **Design guidance** • The public open space should be well connected with public streets along at least one edge • The public open space should be connected with nearby parks and other landscape elements • Public open space should be linked through view lines, pedestrian desire paths, termination points and the wider street grid • Solar access should be provided year round along with protection from strong winds • Opportunities for a range of recreational activities should be provided for people of all ages • A positive address and active frontages should be provided adjacent to public open space • Boundaries should be clearly defined between public open space and private areas	The design concept has sought to connect the proposed redevelopment to the surrounding street network and key community facilities as follows: • The current vehicle entry to the Church will remain so but be reimagined as a shared zone with new pavement treatment and traffic calming measures reinforcing what is already well-understood/utilised by the Wollongong Croatian community • A new pedestrian path has been created to the western side of the Church which links Bellevue Road to the RACF, ILU Apartment Building and the Church and Church Hall • A new pedestrian path has been created to the Eastern boundary linking the Princess Highway footpath network to the Adria Care Village and also facilitating a new shorter link for residents of Benny Avenue	**YES**
3E Deep soil zones		
Objective 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 **Design criteria** 1. Deep soil zones are to meet the following minimum requirements:	While a predominantly urban setting, the proposed redevelopment includes substantial areas of deep soil zones to support healthy plant and tree growth and in turn improve residential amenity and promote management of water and air quality. The proposed re-development site provides 2899.5m² of deep soil or 21% od site area.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
<table><tr><th>Site area</th><th>Minimum dimensions</th><th>Deep soil zone (% of site area)</th></tr><tr><td>less than 650m²</td><td>-</td><td rowspan="4">7%</td></tr><tr><td>650m² - 1,500m²</td><td>3m</td></tr><tr><td>greater than 1,500m²</td><td>6m</td></tr><tr><td>greater than 1,500m² with significant existing tree cover</td><td>6m</td></tr></table>		
Design guidance • On some sites it may be possible to provide larger deep soil zones, depending on the site area and context: • 10% of the site as deep soil on sites with an area of 650m2 - 1,500m2 • 15% of the site as deep soil on sites greater than 1,500m2 • Deep soil zones should be located to retain existing significant trees and to allow for the development of healthy root systems, providing anchorage and stability for mature trees. Design solutions may include: • basement and sub basement car park design that is consolidated beneath building footprints • use of increased front and side setbacks • adequate clearance around trees to ensure long term health • co-location with other deep soil areas on adjacent sites to create larger contiguous areas of deep soil • Achieving the design criteria may not be possible on some sites including where: • the location and building typology have limited or no space for deep soil at ground level (e.g. central business district, constrained sites, high density areas, or in centres) • there is 100% site coverage or non-residential uses at ground floor level	Exceeds standard 2,899.5m² or 21% of the site area. These deep soil planting areas have been either retained or established to both preserve existing significant trees as well as create opportunities for new tree plantings. This has been achieved through ensuring: • New basement carparking is underneath building footprints • Increased front and side setbacks • Good clearances around existing and new tree plantings • Colocation with other deep soil areas on adjacent sites to achieve larger contiguous areas of deep soil Over and above these initiatives, the proposal includes a substantial roof top garden area with appropriately sized elevated planter beds / boxes to further achieve a generous landscape setting and increased green infrastructure as well as cater for the specific needs of those with dementia and RACF staff.	**YES**

<table>
<tr><th>SEPP 65 Apartment Design Guidelines</th><th>Proposal</th><th>Compliance</th></tr>
<tr><td>• Where a proposal does not achieve deep soil requirements, acceptable stormwater management should be achieved and alternative forms of planting provided such as on structure</td><td></td><td></td></tr>
<tr><td colspan="3">3F Visual privacy</td></tr>
<tr><td>Objective 3F-1
Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy
Design criteria
1. 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:
<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>Note: Separation distances between buildings on the same site should combine required building separations depending on the type of room (see figure 3F.2) Gallery access circulation should be treated as habitable space when measuring privacy separation distances between neighbouring properties</td><td>The required separation distances of 6m to side and rear boundaries for building up to 4-storeys high are observed for both the RACF and ILU buildings in all situations to all adjoining residential neighbours.</td><td>YES</td></tr>
<tr><td>Design guidance
Generally, one step in the built form as the height increases due to building separations is desirable. Additional steps should be careful not to cause a 'ziggurat' appearance
• For residential buildings next to commercial buildings, separation distances should be measured as follows:
• for retail, office spaces and commercial balconies use the habitable room distances</td><td>The design concept is an attractive architectural solution which seeks to find a balance between providing much needed retirement living and aged care accommodation efficiently/viably while respecting the surrounding context including the adjacent residential areas and Mary Queen of Croats Church as the focal point of the site. In this regard the design concept seeks to achieve an articulated plan form and volume including:
• An interesting RACF plan which responds to Adria’s brief to break-up this building into smaller functional households commensurate with the findings of the recent Aged Care Royal Commission and the principles of Enabling Environments</td><td>YES</td></tr>
</table>

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• for service and plant areas use the non-habitable room distances • New development should be located and oriented to maximise visual privacy between buildings on site and for neighbouring buildings. Design solutions include: • site layout and building orientation to minimise privacy impacts (see also section 3B Orientation) • on sloping sites, apartments on different levels have appropriate visual separation distances (see figure 3F.4) • Apartment buildings should have an increased separation distance of 3m (in addition to the requirements set out in design criteria 1) when adjacent to a different zone that permits lower density residential development to provide for a transition in scale and increased landscaping (figure 3F.5) • Direct lines of sight should be avoided for windows and balconies across corners. No separation is required between blank walls	• A gradation in scale of the RACF responding to the site slope and minimising the bulk and scale of this building	
3F Visual privacy		
Objective 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 **Design guidance** • Communal open space, common areas and access paths should be separated from private open space and windows to apartments, particularly habitable room windows. Design solutions may include: • setbacks • solid or partially solid balustrades to balconies at lower levels • fencing and/or trees and vegetation to separate spaces • screening devices	The site has several constraints as identified in the Site Analysis and Opportunities and Constraints plans prepared as part of the DA submission. The proposal includes 3 Communal open space areas including: 1. The central Public Square – An urban setting as a central focus to all site uses / residents, parishioners and related people noting that there are no residential aged care bedrooms or ILU apartments that interface with this space at Ground Level and those that do so at an upper level retain privacy given the natural height difference, balustrades and balconies 2. A children's/adult playground to the East of the site – Less overlooked in a natural setting yet conveniently accessed. Given the level changes associated with the site such that any residential aged care bedrooms are elevated and given the separation between these lower level rooms and proposed landscape buffer treatment there will minimal impact 3. A rooftop garden – A controlled area for residents suffering from dementia and staff of the RACF which does not impact on any residents Moreover, there is no visual connection between entry foyers and ILU apartments, all balconies are addressed directly off Living rooms and balconies are recessed for visual and acoustic privacy.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• bay windows or pop out windows to provide privacy in one direction and outlook in another • raising apartments/private open space above the public domain or communal open space • planter boxes incorporated into walls and balustrades to increase visual separation • pergolas or shading devices to limit overlooking of lower apartments or private open space • on constrained sites where it can be demonstrated that building layout opportunities are limited, fixed louvres or screen panels to windows and/or balconies • Bedrooms, living spaces and other habitable rooms should be separated from gallery access and other open circulation space by the apartment's service areas • Balconies and private terraces should be located in front of living rooms to increase internal privacy • Windows should be offset from the windows of adjacent buildings • Recessed balconies and/or vertical fins should be used between adjacent balconies	The buildings also meet minimum side separation distance to side boundaries to the adjoining residential areas with 6m+ setbacks. These side areas are also predominately deep soil landscaping that will allow for large plantings that will assist in privacy to the adjoining residential areas.	
3G Pedestrian access and entries		
Objective 3G-1 Building entries and pedestrian access connects to and addresses the public domain Design guidance • Multiple entries (including communal building entries and individual ground floor entries) should be provided to activate the street edge • Entry locations relate to the street and subdivision pattern and the existing pedestrian network • Building entries should be clearly identifiable and communal entries should be clearly distinguishable from private entries	The proposed development includes an integrated pedestrian network allowing access from the 3 adjoining street frontages on to the site. Moreover, all building entries are clear and legible from this pedestrian path network. There is also a logical wayfinding hierarchy such that building entries are clearly distinguishable from communal entries. Noting that the Mary Queen of Croats church and Hall will form part of Adria Care Village, the proposed new development will retain a primary street address to Bellevue Street. Moreover, there is a new main entry to the site from Bellevue Street in-between the new Independent Living Units Apartment Building and the existing Church which clear signage, an entry gate and lighting.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Where street frontage is limited and multiple buildings are located on the site, a primary street address should be provided with clear sight lines and pathways to secondary building entries		
Objective 3G-2 Access, entries and pathways are accessible and easy to identify. **Design guidance** • Building access areas including lift lobbies, stairwells and hallways should be clearly visible from the public domain and communal spaces • The design of ground floors and underground car parks minimise level changes along pathways and entries • Steps and ramps should be integrated into the overall building and landscape design • For large developments 'way finding' maps should be provided to assist visitors and residents (see figure 4T.3) • For large developments electronic access and audio/video intercom should be provided to manage access	All entries to new buildings including the ILU building and the RACF are accessible, compliant with AS1428.1 and easily identified. The main pedestrian spine off Bellevue Street provides a clear connection to the 2 entry points for the ILU Apartment Block and then leads into the Public Square where the 2 entry points to the RACF are clearly visible. More specifically: • Every effort has been made to minimise level changes at entry points • There are no steps required to be used by residents or the general public • Ramps are integrated into the overall landscape design • The few steps that are proposed are for access to garden areas for maintenance staff	**YES**
Objective 3G-3 Large sites provide pedestrian links for access to streets and connection to destinations **Design guidance** • Pedestrian links through sites facilitate direct connections to open space, main streets, centres and public transport • Pedestrian links should be direct, have clear sight lines, be overlooked by habitable rooms or private open spaces of dwellings, be well lit and contain active uses, where appropriate	As described above the development concept proposed excellent path linkages from the 3 street frontages including the Princess Hwy, Bellevue Street and Benny Avenue into the site facilitating excellent pedestrian connections through, across and within the site. These also ensure convenient access to Figtree shopping centre precinct and public transport. There is good passive surveillance over all pedestrian path networks along with appropriate lighting and signage.	**YES**
3H Vehicle access		

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 3H-1 Vehicle access points are designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes **Design guidance** • Car park access should be integrated with the building's overall facade. Design solutions may include: • the materials and colour palette to minimise visibility from the street • security doors or gates at entries that minimise voids in the facade • where doors are not provided, the visible interior reflects the facade design and the building services, pipes and ducts are concealed • Car park entries should be located behind the building line • Vehicle entries should be located at the lowest point of the site minimising ramp lengths, excavation and impacts on the building form and layout • Car park entry and access should be located on secondary streets or lanes where available • Vehicle standing areas that increase driveway width and encroach into setbacks should be avoided • Access point locations should avoid headlight glare to habitable rooms • Adequate separation distances should be provided between vehicle entries and street intersections • The width and number of vehicle access points should be limited to the minimum • Visual impact of long driveways should be minimised through changing alignments and screen planting • The need for large vehicles to enter or turn around within the site should be avoided	The proposed redevelopment has 3 vehicle entry points which, on the advice of our traffic consultant GTA, do not connect or encourage the site to be used as a "rat run". There are 3 entries off Bellevue Street including the existing site entry, Church exists and a new entry to the west providing access to a two-storey basement associated with the ILU Apartment building and also providing convenient parking for the Croatian Catholic Church parishioners and parish priest. With regards to the new entry, we confirm that the associated basement entry is located behind the building line and outside of the main footprint of the building to achieve a more logical and efficient carparking arrangement. There are no vehicle standing areas that increase the driveway width / encroach into setbacks. The position of the driveway minimises glare to habitable rooms and is well setback from any intersections. The Bellevue Street frontage includes new integrated landscaping and new surface finishes to allow for a shared zone flexibility when required. The driveway is setback sufficiently from the street to ensure sightlines are clear to any pedestrian movement. Surface materials changes are also proposed to highlight pedestrian movement zones. Waste is discretely managed at level 1 of the basement which is then collected from a convenient and discrete location in the Village Square. While not applicable to the SEPP 65 Apartment Design guidelines, the basement to the RACF is not visible from Benny and Avenue and is also integrated into the design of the building to achieve an attractive, functional, and discrete arrangement.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance

• Garbage collection, loading and servicing areas are screened
• Clear sight lines should be provided at pedestrian and vehicle crossings
• Traffic calming devices such as changes in paving material or textures should be used where appropriate
• Pedestrian and vehicle access should be separated and distinguishable. Design solutions may include:
  • changes in surface materials
  • level changes
  • the use of landscaping for separation		

3J Bicycle and car parking		

Objective 3J-1
Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas
Design criteria
1. For development in the following locations:
  • on sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or
  • on land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre
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
	The design proposal meets the provisions of the Wollongong City Council DCP and LEP 2009 and the Australian Standards as per GTA/Stantec's Traffic Impact Assessment provided as part of the DA submission. Specifically, 40 bike parks are proposed with the redevelopment including:
	• 10 bike parks in front of the Hall.
	• 10 bike parks at the rear of the Hall within the Village Square
	• 20 bike parks within the RACF basement
		YES

Design guidance • Where a car share scheme operates locally, provide car share parking spaces within the development. Car share spaces, when provided, should be on site	NA	**NA**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Where less car parking is provided in a development, council should not provide on street resident parking permits		
Objective 3J-2 Parking and facilities are provided for other modes of transport **Design guidance** • Conveniently located and sufficient numbers of parking spaces should be provided for motorbikes and scooters • Secure undercover bicycle parking should be provided that is easily accessible from both the public domain and common areas • Conveniently located charging stations are provided for electric vehicles, where desirable	The design proposal meets the provisions of the Wollongong City Council DCP and LEP 2009 and the Australian Standards as per GTA/Stantec's Traffic Impact Assessment provided as part of the DA submission. Specifically, 4 Motorcycle parks are provided within the basement of the RACF.	**YES**
Objective 3J-3 Car park design and access is safe and secure **Design guidance** • Supporting facilities within car parks, including garbage, plant and switch rooms, storage areas and car wash bays can be accessed without crossing car parking spaces • Direct, clearly visible and well lit access should be provided into common circulation areas • A clearly defined and visible lobby or waiting area should be provided to lifts and stairs • For larger car parks, safe pedestrian access should be clearly defined and circulation areas have good lighting, colour, line marking and/or bollards	The design proposal meets the provisions of the Wollongong City Council DCP and LEP 2009 and the Australian Standards as per GTA/Stantec's Traffic Impact Assessment provided as part of the DA submission. Moreover, within each basement associated with the RACF and ILU Apartment Block, supporting facilities are provided including garbage, plant, storage areas, car wash bays without crossing car parking spaces. Direct, will lit and clearly visible access is provided to common circulation areas and lift lobbies.	**YES**
Objective 3J-4 Visual and environmental impacts of underground car parking are minimised **Design guidance** • Excavation should be minimised through efficient car park layouts and ramp design	While the site is steep sloping every effort has been made to minimise visual and environmental impacts of basement parking including an efficient, well organised arrangement. The slope of the site has resulted in a component of the ILU Apartment building basement being more than 1m out of the ground. This is most obviously visible from the western façade which is set down some 2m from the adjacent property and as such not visible for neighbours or indeed residents alike. Integrated natural ventilation is provided discretely to the western side of the façade.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Car parking layout should be well organised, using a logical, efficient structural grid and double loaded aisles • Protrusion of car parks should not exceed 1m above ground level. Design solutions may include stepping car park levels or using split levels on sloping sites • Natural ventilation should be provided to basement and sub basement car parking areas • Ventilation grills or screening devices for car parking openings should be integrated into the facade and landscape design		
Objective 3J-5 Visual and environmental impacts of on-grade car parking are minimised **Design guidance** • On-grade car parking should be avoided • Where on-grade car parking is unavoidable, the following design solutions are used: • parking is located on the side or rear of the lot away from the primary street frontage • cars are screened from view of streets, buildings, communal and private open space areas • safe and direct access to building entry points is provided • parking is incorporated into the landscape design of the site, by extending planting and materials into the car park space • stormwater run-off is managed appropriately from car parking surfaces • bio-swales, rain gardens or on site detention tanks are provided, where appropriate • light coloured paving materials or permeable paving systems are used and shade trees are planted between every 4-5 parking spaces to reduce increased surface temperatures from large areas of paving	Noting the site is flood-affected the development proposal seeks to provide convenient at-grade parking towards the eastern portion of the subject site as part of an integrated landscaped area including an attractive pedestrian walkway and park area. While fronting the Princess Highway, this location is discrete from the main Bellevue Street frontage. Stormwater run-off is carefully managed as per the Civil Engineering and Flood Engineering documentation and associated report provided with this DA submission.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 3J-6 Visual and environmental impacts of above ground enclosed car parking are minimised **Design guidance** • Exposed parking should not be located along primary street frontages • Screening, landscaping and other design elements including public art should be used to integrate the above ground car parking with the facade. Design solutions may include: • Positive street address and active frontages should be provided at ground level	NA	**NA**
Part 4: Designing the building		
4A Solar and daylight access		
Objective 4A-1 To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space **Design criteria** 1. Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas 2. In all other areas, living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9 am and 3 pm at mid winter. 3. A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid winter	The project is within the Wollongong Local Government Area and achieves the following: • 85% of apartments have access to more than 2 hours of sunlight between 9 am and 3pm at the mid-winter solstice • Less than 15% percent of apartments (G.03, 1.03 and 2.03) face south and receive no sun at the mid-winter solstice. These units overlook the Public Square (TRG) and 2.03 also has broader interesting views to the south. • Refer to DA 990 for demonstration of compliance	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Design guidance • The design maximises north aspect and the number of single aspect south facing apartments is minimised • Single aspect, single storey apartments should have a northerly or easterly aspect • Living areas are best located to the north and service areas to the south and west of apartments • To optimise the direct sunlight to habitable rooms and balconies a number of the following design features are used: • dual aspect apartments • shallow apartment layouts • two storey and mezzanine level apartments • bay windows • To maximise the benefit to residents of direct sunlight within living rooms and private open spaces, a minimum of 1m2 of direct sunlight, measured at 1m above floor level, is achieved for at least 15 minutes • Achieving the design criteria may not be possible on some sites. This includes: • where greater residential amenity can be achieved along a busy road or rail line by orientating the living rooms away from the noise source • on south facing sloping sites • where significant views are oriented away from the desired aspect for direct sunlight • Design drawings need to demonstrate how site constraints and orientation preclude meeting the design criteria and how the development meets the objective	Single south facing units have been minimised (only 3 south facing units out of 22 ILU units) equating to 13.6% of the development. Northerly and easterly facing units have been maximised, however single aspect units G.05, G.10, 1.05 and 1.10 have a north westerly orientation. All units, except for the south facing units, receive 1m² of direct sunlight at 1m above floor level for at least 15 minutes.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4A-2 Daylight access is maximised where sunlight is limited **Design guidance** • Courtyards, skylights and high level windows (with sills of 1,500mm or greater) are used only as a secondary light source in habitable rooms • Where courtyards are used : • use is restricted to kitchens, bathrooms and service areas • building services are concealed with appropriate detailing and materials to visible walls • courtyards are fully open to the sky • access is provided to the light well from a communal area for cleaning and maintenance • acoustic privacy, fire safety and minimum privacy separation distances (see section 3F Visual privacy) are achieved • Opportunities for reflected light into apartments are optimised through: • reflective exterior surfaces on buildings opposite south facing windows • positioning windows to face other buildings or surfaces (on neighbouring sites or within the site) that will reflect light • integrating light shelves into the design • light coloured internal finishes	South facing units (G.03, 1.03 and 2.03) have living rooms and balconies with direct access to an external wall.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4A-3 Design incorporates shading and glare control, particularly for warmer months **Design guidance** • A number of the following design features are used: • balconies or sun shading that extend far enough to shade summer sun, but allow winter sun to penetrate living areas • shading devices such as eaves, awnings, balconies, pergolas, external louvres and planting • horizontal shading to north facing windows • vertical shading to east and particularly west facing windows • operable shading to allow adjustment and choice • high performance glass that minimises external glare off windows, with consideration given to reduced tint glass or glass with a reflectance level below 20% (reflective films are avoided	A BASIX certificate has been included within the architectural documentation which identifies that the proposal achieves the required thermal comfort levels for a development of this scale. However: • All North, North-East and North-West facing units windows are provided with horizontal sun hoods. • There are no windows facing directly east or west • The SHGC of the windows is proposed to be 3.9 which is a medium performing glass which maximises the ability to access views and well as providing a protection against solar heat gain	**YES**
4B Natural ventilation		

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4B-1 All habitable rooms are naturally ventilated **Design guidance** • The building's orientation maximises capture and use of prevailing breezes for natural ventilation in habitable rooms • Depths of habitable rooms support natural ventilation • The area of unobstructed window openings should be equal to at least 5% of the floor area served • Light wells are not the primary air source for habitable rooms • Doors and openable windows maximise natural ventilation opportunities by using the following design solutions: • adjustable windows with large effective openable areas • a variety of window types that provide safety and flexibility such as awnings and louvres • windows which the occupants can reconfigure to funnel breezes into the apartment such as vertical louvres, casement windows and externally opening doors	All habitable rooms are located on an external wall and are naturally ventilated, with a minimum of 5% of the floor area. Habitable rooms are no greater than 2.5 times the ceiling height in depth or have access to cross ventilation	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4B-2 The layout and design of single aspect apartments maximises natural ventilation **Design guidance** • Apartment depths are limited to maximise ventilation and airflow (see also figure 4D.3) • Natural ventilation to single aspect apartments is achieved with the following design solutions: • primary windows are augmented with plenums and light wells (generally not suitable for cross ventilation) • stack effect ventilation / solar chimneys or similar to naturally ventilate internal building areas or rooms such as bathrooms and laundries • courtyards or building indentations have a width to depth ratio of 2:1 or 3:1 to ensure effective air circulation and avoid trapped smells	The 1 Bedroom single aspect apartments have a 7m depth for the living dining rooms.	**YES**
Objective 4B-3 The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents **Design criteria** 1. 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 2. Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line	Only 4 out the 22 (18.2%) units are single aspect, the remainder of units are offered as either corner or through ventilation, dual aspect units. The overall depth of the through-units (G.06, G0.9, 1.06, 1.092.06 and 2.09) is 18m.	**YES**
Design guidance • The building should include dual aspect apartments, cross through apartments and corner apartments and limit apartment depths	The proposed ILU apartments have a predominance of dual aspect apartments, cross-through/flow apartments and corner apartments. They have simple plans, with clear paths for cross or through ventilation.	**YES**

<table>
<tr><th>SEPP 65 Apartment Design Guidelines</th><th>Proposal</th><th>Compliance</th></tr>
<tr><td>

- In cross-through apartments external window and door opening sizes/areas on one side of an apartment (inlet side) are approximately equal to the external window and door opening sizes/areas on the other side of the apartment (outlet side) (see figure 4B.4)
- Apartments are designed to minimise the number of corners, doors and rooms that might obstruct airflow Apartment depths, combined with appropriate ceiling heights, maximise cross ventilation and airflow

</td><td></td><td></td></tr>
<tr><td colspan="3">4C Ceiling heights</td></tr>
<tr><td>

Objective 4C-1

Ceiling height achieves sufficient natural ventilation and daylight access

Design criteria

1. Measured from finished floor level to finished ceiling level, minimum ceiling heights are:

<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>

These minimums do not preclude higher ceilings if desired

</td><td>All ILU apartment units are proposed with 2.7m ceiling height to all habitable rooms and 2.4m ceilings to non-habitable rooms</td><td>YES</td></tr>
<tr><td>

Design guidance

- Ceiling height can accommodate use of ceiling fans for cooling and heat distribution

</td><td>Ceiling fans are not proposed with the development, however the habitable rooms of all units can accommodate ceiling fans, if required.</td><td>YES</td></tr>
</table>

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4C-2 Ceiling height increases the sense of space in apartments and provides for well-proportioned rooms **Design guidance** • A number of the following design solutions can be used: • the hierarchy of rooms in an apartment is defined using changes in ceiling heights and alternatives such as raked or curved ceilings, or double height spaces • well proportioned rooms are provided, for example, smaller rooms feel larger and more spacious with higher ceilings • ceiling heights are maximised in habitable rooms by ensuring that bulkheads do not intrude. The stacking of service rooms from floor to floor and coordination of bulkhead location above non-habitable areas, such as robes or storage, can assist	For the ILU Apartment building, the floor-to-floor height proposed is 3.1m with a 2.7m ceiling height to habitable rooms and 2.4m ceiling height to non-habitable rooms providing well-proportioned spaces. There will be small bulkheads to 2.4m to the perimeter of some habitable rooms to allow for exhaust ducts to ventilate from internal bathrooms to the external walls where robes and storage areas are not available	**YES**
Objective 4C-3 Ceiling heights contribute to the flexibility of building use over the life of the building **Design guidance** • Ceiling heights of lower level apartments in centres should be greater than the minimum required by the design criteria allowing flexibility and conversion to non-residential uses (see figure 4C.1)	The proposed development has been designed to incorporate the minimum floor to ceiling heights as required under the ADG.	**YES**
4D Apartment size and layout		
Objective 4D-1 The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity **Design criteria** 1. Apartments are required to have the following minimum internal areas:	The area of each apartment type exceeds the minimum size: • 1 Bedroom = 65 - 74m² • 2 Bedroom = 105 - 107m² • 3 Bedroom = 115 to 128m²	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
<table><tr><th>Apartment type</th><th>Minimum internal area</th></tr><tr><td>Studio</td><td>35m²</td></tr><tr><td>1 bedroom</td><td>50m²</td></tr><tr><td>2 bedroom</td><td>70m²</td></tr><tr><td>3 bedroom</td><td>90m²</td></tr></table> The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m2 each A fourth bedroom and further additional bedrooms increase the minimum internal area by 12m2 each 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		
Design guidance • Kitchens should not be located as part of the main circulation space in larger apartments (such as hallway or entry space) • A window should be visible from any point in a habitable room • Where minimum areas or room dimensions are not met apartments need to demonstrate that they are well designed and demonstrate the usability and functionality of the space with realistically scaled furniture layouts and circulation areas. These circumstances would be assessed on their merits	All habitable rooms have a window to an external wall with a total minimum glass area of 10% of the floor area. Other than the small one bedroom ILU Apartment types 1b and 1c, which have entry alcoves adjacent / though kitchens, all typically have dedicated entry areas and discrete kitchens	**YES**
Objective 4D-2 Environmental performance of the apartment is maximised **Design criteria** 1. Habitable room depths are limited to a maximum of 2.5 x the ceiling height 2. In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window	Noting an applicable ceiling heigh of 2.7m, 16 of the 22 units are provided with habitable rooms with a maximum depth of 6.8m, while 6 of the units are dual aspect units where the living, dining kitchen room is a total of 11m deep, however the kitchen is only 4m from an external wall and window, via the adjacent bedroom.	**YES**
Design guidance	All living areas and bedrooms are located on the external face of the building	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Greater than minimum ceiling heights can allow for proportional increases in room depth up to the permitted maximum depths • All living areas and bedrooms should be located on the external face of the building • Where possible: • bathrooms and laundries should have an external openable window • main living spaces should be oriented toward the primary outlook and aspect and away from noise sources		
Objective 4D-3 Apartment layouts are designed to accommodate a variety of household activities and needs **Design criteria** 1. Master bedrooms have a minimum area of 10m2 and other bedrooms 9m2 (excluding wardrobe space) 2. 2. Bedrooms have a minimum dimension of 3m (excluding wardrobe space) 3. Living rooms or combined living/dining rooms have a minimum width of: • 3.6m for studio and 1 bedroom apartments • 4m for 2 and 3 bedroom apartments 4. The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts	All master bedrooms have an aera more than 10m2 all other bedrooms have a minimum area of greater than 9m². All bedrooms have a minimum dimension of 3m. The living areas of all one-bedroom ILU Apartments have a width of greater than 3.6m. The livings areas of all three-bedroom ILU Apartments have a width of greater than 4.0m. The living areas of the two-bedroom ILU Apartments (G.04 and 1.04) are 3.8 wide by 7m deep. While this is a minor departure, it is proposed that the overall floor area and the open plan living arrangement of the kitchen, dining and living area will provide significant opportunities for flexible arrangement of furniture and a variety of household activities. The cross through apartments have a minimum width of the living dining area of 4.2m	**Variation**
Design guidance • Access to bedrooms, bathrooms and laundries is separated from living areas minimising direct openings between living and service areas • All bedrooms allow a minimum length of 1.5m for robes • The main bedroom of an apartment or a studio apartment should be provided with a wardrobe of a minimum 1.8m long, 0.6m deep and 2.1m high	The proposed apartments have been designed to incorporate appropriate location of services areas and proximity to living spaces. In addition, all bedroom wardrobes comply with the dimension requirements.	**YES**

<table>
<tr><th>SEPP 65 Apartment Design Guidelines</th><th>Proposal</th><th>Compliance</th></tr>
<tr><td>

- Apartment layouts allow flexibility over time, design solutions may include:
  - dimensions that facilitate a variety of furniture arrangements and removal
  - spaces for a range of activities and privacy levels between different spaces within the apartment
  - dual master apartments
  - dual key apartments

  Note: dual key apartments which are separate but on the same title are regarded as two sole occupancy units for the purposes of the Building Code of Australia and for calculating the mix of apartments
  - room sizes and proportions or open plans (rectangular spaces (2:3) are more easily furnished than square spaces (1:1))
  - efficient planning of circulation by stairs, corridors and through rooms to maximise the amount of usable floor space in rooms

</td><td></td><td></td></tr>
<tr><td colspan="3">4E Private open space and balconies</td></tr>
<tr><td>

Objective 4E-1

Apartments provide appropriately sized private open space and balconies to enhance residential amenity

Design criteria

1. 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>

The minimum balcony depth to be counted as contributing to the balcony area is 1m

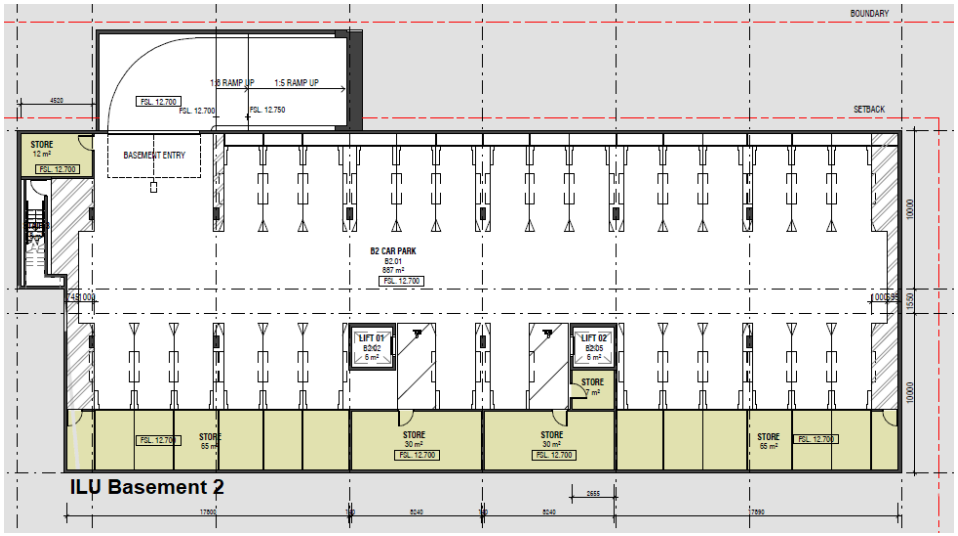
</td><td>All ILU Apartments are provided with private open spaces or balconies that meet or exceed the minimum requirements including ground level apartments with direct level access to adjacent ground level</td><td>YES</td></tr>
</table>

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
2. 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		
Design guidance • Increased communal open space should be provided where the number or size of balconies are reduced • Storage areas on balconies is additional to the minimum balcony size • Balcony use may be limited in some proposals by: • consistently high wind speeds at 10 storeys and above • close proximity to road, rail or other noise sources • exposure to significant levels of aircraft noise • heritage and adaptive reuse of existing buildings In these situations, juliet balconies, operable walls, enclosed wintergardens or bay windows may be appropriate, and other amenity benefits for occupants should also be provided in the apartments or in the development or both. Natural ventilation also needs to be demonstrated	Not required	**YES**
Objective 4E-2 Primary private open space and balconies are appropriately located to enhance liveability for residents. **Design guidance** • Primary open space and balconies should be located adjacent to the living room, dining room or kitchen to extend the living space • Private open spaces and balconies predominantly face north, east or west • Primary open space and balconies should be orientated with the longer side facing outwards or be open to the sky to optimise daylight access into adjacent rooms	All ILU Apartments, except G.03, 1.03 and 2.03, have a northeast or North West orientated balcony or private open space. Units G.03, 1.03 and 2.03, oriented to the public open space Public Square adding to the active public space. All balconies have their long side oriented outwards.	**YES**
Objective 4E-3	The balconies of the ILU Apartments are subtractive architectural elements and are incorporated into the overall design of the buildings.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building **Design guidance** • Solid, partially solid or transparent fences and balustrades are selected to respond to the location. They are designed to allow views and passive surveillance of the street while maintaining visual privacy and allowing for a range of uses on the balcony. Solid and partially solid balustrades are preferred • Full width full height glass balustrades alone are generally not desirable • Projecting balconies should be integrated into the building design and the design of soffits considered • Operable screens, shutters, hoods and pergolas are used to control sunlight and wind • Balustrades are set back from the building or balcony edge where overlooking or safety is an issue • Downpipes and balcony drainage are integrated with the overall facade and building design • Air-conditioning units should be located on roofs, in basements, or fully integrated into the building design • Where clothes drying, storage or air conditioning units are located on balconies, they should be screened and integrated in the building design • Ceilings of apartments below terraces should be insulated to avoid heat loss • Water and gas outlets should be provided for primary balconies and private open space	The balconies utilise a vertical metal balustrade which provides a contrast and visual relief to the adjacent brick work. Further the charcoal colour ties this building in to other metal elements across the broader development. Balconies are recessed or have good eaves over hangs providing shading and sun control options.	
Objective 4E-4 Private open space and balcony design maximises safety **Design guidance** • Changes in ground levels or landscaping are minimised	Where appropriate/practical given the site slope, ground level units have been provided with safe level purpose design external landscape areas	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Design and detailing of balconies avoids opportunities for climbing and falls		
4F Common circulation and spaces		
Objective 4F-1 Common circulation spaces achieve good amenity and properly service the number of apartments **Design criteria** 1. The maximum number of apartments off a circulation core on a single level is eight 2. For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40	The maximum number of units off a single lift is four. Common areas are designed with access to natural light and visual connection to external circulation	**YES**
Design guidance • Greater than minimum requirements for corridor widths and/ or ceiling heights allow comfortable movement and access particularly in entry lobbies, outside lifts and at apartment entry doors • Daylight and natural ventilation should be provided to all common circulation spaces that are above ground • Windows should be provided in common circulation spaces and should be adjacent to the stair or lift core or at the ends of corridors • Longer corridors greater than 12m in length from the lift core should be articulated. Design solutions may include: • a series of foyer areas with windows and spaces for seating • wider areas at apartment entry doors and varied ceiling heights • Design common circulation spaces to maximise opportunities for dual aspect apartments, including multiple core apartment buildings and cross over apartments	Glazing is provided to each core stair to provide natural daylight. Corridor lengths are less than 12m	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Achieving the design criteria for the number of apartments off a circulation core may not be possible. Where a development is unable to achieve the design criteria, a high level of amenity for common lobbies, corridors and apartments should be demonstrated, including: • sunlight and natural cross ventilation in apartments • access to ample daylight and natural ventilation in common circulation spaces • common areas for seating and gathering • generous corridors with greater than minimum ceiling heights • other innovative design solutions that provide high levels of amenity • Where design criteria 1 is not achieved, no more than 12 apartments should be provided off a circulation core on a single level • Primary living room or bedroom windows should not open directly onto common circulation spaces, whether open or enclosed. Visual and acoustic privacy from common circulation spaces to any other rooms should be carefully controlled		
Objective 4F-2 Common circulation spaces promote safety and provide for social interaction between residents **Design guidance** • Direct and legible access should be provided between vertical circulation points and apartment entries by minimising corridor or gallery length to give short, straight, clear sight lines • Tight corners and spaces are avoided • Circulation spaces should be well lit at night • Legible signage should be provided for apartment numbers, common areas and general wayfinding	Each ILU Apartment block core has an open staircase that promotes social interaction and safety. These core stairs have visual access to the central communal area.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Incidental spaces, for example space for seating in a corridor, at a stair landing, or near a window are provided • In larger developments, community rooms for activities such as owners corporation meetings or resident use should be provided and are ideally co-located with communal open space • Where external galleries are provided, they are more open than closed above the balustrade along their length		
4G Storage		
Objective 4G-1 Adequate, well designed storage is provided in each apartment **Design criteria** 1. In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided: At least 50% of the required storage is to be located within the apartment	The proposal provides for storage within each apartment and the basement level. These comply with the minimum requirements in the ADG. For example, basement 2 of the ILU building provides for extensive store areas – see plan detail below. 	**YES**

Dwelling type	Storage size volume
Studio apartments	4m³
1 bedroom apartments	6m³
2 bedroom apartments	8m³
3+ bedroom apartments	10m³

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Design guidance • Storage is accessible from either circulation or living areas • Storage provided on balconies (in addition to the minimum balcony size) is integrated into the balcony design, weather proof and screened from view from the street • Left over space such as under stairs is used for storage	The proposal provides for storage within each apartment and the basement level. These comply with the minimum requirements in the ADG.	**YES**
Objective 4G-2 Additional storage is conveniently located, accessible and nominated for individual apartments **Design guidance** • Storage not located in apartments is secure and clearly allocated to specific apartments • Storage is provided for larger and less frequently accessed items • Storage space in internal or basement car parks is provided at the rear or side of car spaces or in cages so that allocated car parking remains accessible • If communal storage rooms are provided they should be accessible from common circulation areas of the building • Storage not located in an apartment is integrated into the overall building design and is not visible from the public domain	Storage is provided within the respective apartments and in dedicated storage cages in the basement.	**YES**
4H Acoustic privacy		
Objective 4H-1 Noise transfer is minimised through the siting of buildings and building layout **Design guidance** • Adequate building separation is provided within the development and from neighbouring buildings/adjacent uses (see also section 2F Building separation and section 3F Visual privacy) • Window and door openings are generally orientated away from noise sources	The building will incorporate best practice acoustic insulation between apartments. As a minimum requirement, the sound insulation between apartments shall comply with the Building Code of Australia. Service pipes and apartment entrance doors shall comply with the minimum requirements of the BCA	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Noisy areas within buildings including building entries and corridors should be located next to or above each other and quieter areas next to or above quieter areas • Storage, circulation areas and non-habitable rooms should be located to buffer noise from external sources • The number of party walls (walls shared with other apartments) are limited and are appropriately insulated • Noise sources such as garage doors, driveways, service areas, plant rooms, building services, mechanical equipment, active communal open spaces and circulation areas should be located at least 3m away from bedrooms		
Objective 4H-2 Noise impacts are mitigated within apartments through layout and acoustic treatments **Design guidance** • Internal apartment layout separates noisy spaces from quiet spaces, using a number of the following design solutions: • rooms with similar noise requirements are grouped together • doors separate different use zones • wardrobes in bedrooms are co-located to act as sound buffers • Where physical separation cannot be achieved noise conflicts are resolved using the following design solutions: • double or acoustic glazing • acoustic seals • use of materials with low noise penetration properties • continuous walls to ground level courtyards where they do not conflict with streetscape or other amenity requirements	The building will incorporate best practice acoustic insulation between apartments. As a minimum requirement, the sound insulation between apartments shall comply with the Building Code of Australia. Service pipes and apartment entrance doors shall comply with the minimum requirements of the BCA.	**YES**
4J Noise and pollution		

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4J-1 In noisy or hostile environments the impacts of external noise and pollution are minimised through the careful siting and layout of buildings **Design guidance** • To minimise impacts the following design solutions may be used: • physical separation between buildings and the noise or pollution source • residential uses are located perpendicular to the noise source and where possible buffered by other uses • non-residential buildings are sited to be parallel with the noise source to provide a continuous building that shields residential uses and communal open spaces • non-residential uses are located at lower levels vertically separating the residential component from the noise or pollution source. Setbacks to the underside of residential floor levels should increase relative to traffic volumes and other noise sources • buildings should respond to both solar access and noise. Where solar access is away from the noise source, nonhabitable rooms can provide a buffer • where solar access is in the same direction as the noise source, dual aspect apartments with shallow building depths are preferable (see figure 4J.4) • landscape design reduces the perception of noise and acts as a filter for air pollution generated by traffic and industry • Achieving the design criteria in this Apartment Design Guide may not be possible in some situations due to noise and pollution. Where developments are unable to achieve the design criteria, alternatives may be considered in the following areas: • solar and daylight access • private open space and balconies • natural cross ventilation	The site is situated in a suburban area and should have minimal external noise impacts. Furthermore, a Noise Impact Assessment has been completed and accompanies the DA submission noting future residents will not be exposed to unacceptable acoustic impacts from external noise sources.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Objective 4J-2 Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission **Design guidance** Design solutions to mitigate noise include: • limiting the number and size of openings facing noise sources • providing seals to prevent noise transfer through gaps • using double or acoustic glazing, acoustic louvres or enclosed balconies (wintergardens) • using materials with mass and/or sound insulation or absorption properties e.g. solid balcony balustrades, external screens and soffits	The building utilises double glazing to minimise any external noise impacts. A noise impact assessment has been completed and submitted with the DA	**YES**
4K Apartment mix		
Objective 4K-1 A range of apartment types and sizes is provided to cater for different household types now and into the future **Design guidance** • A variety of apartment types is provided The apartment mix is appropriate, taking into consideration: • the distance to public transport, employment and education centres • the current market demands and projected future demographic trends • the demand for social and affordable housing • different cultural and socioeconomic groups • Flexible apartment configurations are provided to support diverse household types and stages of life including single person households, families, multi-generational families and group households	A mix of apartments and townhouses have been provided including: • 1 Bedroom – 9 (40%) • 2 Bedroom – 2 (10%) • 3 Bedroom – 11 (50%)	**YES**
Objective 4K-2	Levels Ground and 1 are provided with a mixture of ILU Apartment types, whilst level 2 is provided with only three-bedroom ILU Apartments.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
The apartment mix is distributed to suitable locations within the building **Design guidance** • Different apartment types are located to achieve successful facade composition and to optimise solar access (see figure 4K.3) • Larger apartment types are located on the ground or roof level where there is potential for more open space and on corners where more building frontage is available		
4L Ground floor apartments		
Objective 4L-1 Street frontage activity is maximised where ground floor apartments are located **Design guidance** • Direct street access should be provided to ground floor apartments • Activity is achieved through front gardens, terraces and the facade of the building. Design solutions may include: • both street, foyer and other common internal circulation entrances to ground floor apartments • private open space is next to the street • doors and windows face the street • Retail or home office spaces should be located along street frontages • Ground floor apartment layouts support small office home office (SOHO) use to provide future opportunities for conversion into commercial or retail areas. In these cases provide higher floor to ceiling heights and ground floor amenities for easy conversion	As a retirement living development significant emphasis is placed on resident security and feeling part of the Adria Care community. To this end all ILU apartments are accessed off 2 common foyers. As part of the ownership structure associated with the independent living units, home businesses / office or retail are not considered consistent with the desired character.	**YES**
Objective 4L-2 Design of ground floor apartments delivers amenity and safety for residents **Design guidance**	Ground floor ILU Apartments have been designed to deliver safety and amenity for residents noting that: • The 2 ILU's addressing Bellevue Road are elevated relative to the street and are separated from the proposed pedestrian path • Integrated landscaping is proposed forward of these ILU's including raised planter beds	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Privacy and safety should be provided without obstructing casual surveillance. Design solutions may include: • elevation of private gardens and terraces above the street level by 1-1.5m (see figure 4L.4) • landscaping and private courtyards • window sill heights that minimise sight lines into apartments • integrating balustrades, safety bars or screens with the exterior design • Solar access should be maximised through: • high ceilings and tall windows • trees and shrubs that allow solar access in winter and shade in summer	• Solar access is maintained to these ILU's	
4M Facades		
Objective 4M-1 Building facades provide visual interest along the street while respecting the character of the local area **Design guidance** • Design solutions for front building facades may include: • a composition of varied building elements • a defined base, middle and top of buildings • revealing and concealing certain elements • changes in texture, material, detail and colour to modify the prominence of elements Building services should be integrated within the overall facade • Building facades should be well resolved with an appropriate scale and proportion to the streetscape and human scale. Design solutions may include: • well composed horizontal and vertical elements • variation in floor heights to enhance the human scale • elements that are proportional and arranged in patterns	The architectural design concept for the proposed Adria Care Village: • Is respectful of Mary Queen of Croats Church and affords it pre-eminence as the focal point of the development in total • Reiterates some of the architectural expression of the Church including interesting, canted walls and use of rendered façade elements and vertically proportioned fenestration • Looks to reiterate Croatian vernacular architecture through a contemporary expression of simple forms, deep fenestration, expressed roof lines and a textured façade including face brickwork and rendered elements expressed with different colouring • Seeks visual interest and a breaking up of the scale of the building notwithstanding the significant site constraints The ILU building reiterates some of the architectural expression of the proposed RACF and includes: • A defined base middle and top to the building • A play of light and shadow with recessed elements affording contrast and visual interest • Changes in material and texture • Well-proportioned fenestration	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• public artwork or treatments to exterior blank walls • grouping of floors or elements such as balconies and windows on taller buildings • Building facades relate to key datum lines of adjacent buildings through upper level setbacks, parapets, cornices, awnings or colonnade heights • Shadow is created on the facade throughout the day with building articulation, balconies and deeper window reveals	• Variety in building height and parapet wall expression • Interesting fenestration treatments • Continuity of datum lines between the 2 new buildings were appropriate	
Objective 4M-2 Building functions are expressed by the facade **Design guidance** • Building entries should be clearly defined • Important corners are given visual prominence through a change in articulation, materials or colour, roof expression or changes in height • The apartment layout should be expressed externally through facade features such as party walls and floor slabs	The planning arrangement of the ILU building and RACF is an expression of the functional program for each and a response to site opportunities and constraints. Significant effort and thought has been put into how to create a building expression that feels like a Croatian Village clustered around the local Church and with this in mind: • The building forms have significant articulation in plan and elevation to break up the scale of the development, create visual interest and to assist the development settle into its context • Building corners are giving emphasis through changes in scale, materiality, geometry and architectural devices such as expressed roof forms and core areas. • There is a strong rhythm to the fenestration expression which responds to a logical planning arrangement of ILU Apartment Units	**YES**
4N Roof design		
Objective 4N-1 Roof treatments are integrated into the building design and positively respond to the street **Design guidance** • Roof design relates to the street. Design solutions may include: • special roof features and strong corners • use of skillion or very low pitch hipped roofs • breaking down the massing of the roof by using smaller elements to avoid bulk • using materials or a pitched form complementary to adjacent buildings • Roof treatments should be integrated with the building design. Design solutions may include:	The roof form of the ILU building is expressed through a long horizontal pitched roof form to the western façade reiterating the character of adjoining residential housing and gable wall elements which in combination make for an interesting and pleasing architectural expression and which create a gradation in scale from the Church to the east to the adjoining residential development to the West. Roof materials compliment the building and overall development and service elements are integrated discretely.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• roof design proportionate to the overall building size, scale and form • roof materials compliment the building • service elements are integrated		
Objective 4N-2 Opportunities to use roof space for residential accommodation and open space are maximised **Design guidance** • Habitable roof space should be provided with good levels of amenity. Design solutions may include: • penthouse apartments • dormer or clerestory windows • openable skylights • Open space is provided on roof tops subject to acceptable visual and acoustic privacy, comfort levels, safety and security considerations	The upper-level ILU Apartments are inset from the Western façade resulting in an attractive break in the main building line, the strong expression of the roof element and the creation of larger balconies to what are larger upper-level dwellings.	**YES**
Objective 4N-3 Roof design incorporates sustainability features **Design guidance** • Roof design maximises solar access to apartments during winter and provides shade during summer. Design solutions may include: • the roof lifts to the north • eaves and overhangs shade walls and windows from summer sun • Skylights and ventilation systems should be integrated into the roof design	As a long-term asset for Adria Care, several sustainability initiatives have been incorporated into the design concept to reduce life cycle costing. This includes: • Eaves overhang and shading structures; • Skylights and ventilation systems to the 2 entry cores; and • Use of thermal mass façade systems to achieve energy efficient dwellings	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
4O Landscape design		
Objective 4O-1 Landscape design is viable and sustainable **Design guidance** • Landscape design should be environmentally sustainable and can enhance environmental performance by incorporating: • diverse and appropriate planting • bio-filtration gardens • appropriately planted shading trees • areas for residents to plant vegetables and herbs • composting • green roofs or walls • Ongoing maintenance plans should be prepared Microclimate is enhanced by: • appropriately scaled trees near the eastern and western elevations for shade • a balance of evergreen and deciduous trees to provide shading in summer and sunlight access in winter • shade structures such as pergolas for balconies and courtyards • Tree and shrub selection considers size at maturity and the potential for roots to compete (see Table 4)	The design concept includes an integrated landscape design provided as part of this DA documentation package noting: • The Figtree theming is built upon with new plantings • It incorporates diverse and appropriate plantings • It incorporates Bio-filtration gardens • It incorporates Shading trees • It includes Dedicated areas for purpose-designed and easy to maintain resident gardens • It includes a roof top dementia garden specifically designed for those with Dementia including sensory gardens and the avoidance of dead ends • It incorporates shade structures and a variety of seating areas • It preserves and augments appropriate plantings to common boundaries to preserve privacy and a soft interface with adjoining neighbours	**YES**
Objective 4O-2 Landscape design contributes to the streetscape and amenity **Design guidance** • Landscape design responds to the existing site conditions including: • changes of levels • views • significant landscape features including trees and rock outcrops • Significant landscape features should be protected by:	As a retirement village and community facility, every effort has been made to find a balance between, at times, competing considerations including accessibility and *enabling environments* principles, the slope across the site, flood considerations and project budget. Notwithstanding this the landscape concept: • Responds to the need to manage PMF flood conditions and a trafficable and accessible pedestrian environment with the Public Square (TRG) as the focal point for the Adria Care community, the Croatian Catholic Church community and broader community framed by the existing Church and Hall and the new RACF and ILU Apartment Building. This urban environment will be a highly attractive and functional space that makes sense to the residents and community	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• tree protection zones (see figure 4O.5) • appropriate signage and fencing during construction • Plants selected should be endemic to the region and reflect the local ecology	• A park area to the east of the site including a Children's playground and adult recreation and fitness area more discretely located and near the at-grade parking area • A roof top garden area to the RACF meeting the specific needs of those with dementia We also confirm that several significant trees will be retained and augmented and in particular as part of a new pedestrian path link from the Princess Hwy into the site from the East.	
4P Planting on structures		
Objective 4P-1 Appropriate soil profiles are provided **Design guidance** • Structures are reinforced for additional saturated soil weight • Soil volume is appropriate for plant growth, considerations include: • modifying depths and widths according to the planting mix and irrigation frequency • free draining and long soil life span • tree anchorage • Minimum soil standards for plant sizes should be provided in accordance with Table 5	This DA submission includes a detailed landscape design concept which addressed specific soil profiles to achieve an attractive and robust landscaping solution.	**YES**
Objective 4P-2 Plant growth is optimised with appropriate selection and maintenance **Design guidance** • Plants are suited to site conditions, considerations include: • drought and wind tolerance • seasonal changes in solar access • modified substrate depths for a diverse range of plants • plant longevity • A landscape maintenance plan is prepared Irrigation and drainage systems respond to: • changing site conditions	This DA submission includes a detailed landscape design concept which addresses plant selection to achieve drought and wind tolerance, seasonal changes in solar access, modified substrate depths for a diverse range of plants and plant longevity	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• soil profile and the planting regime • whether rainwater, stormwater or recycled grey water is used		
Objective 4P-3 Planting on structures contributes to the quality and amenity of communal and public open spaces **Design guidance** Building design incorporates opportunities for planting on structures. Design solutions may include: • green walls with specialised lighting for indoor green walls • wall design that incorporates planting • green roofs, particularly where roofs are visible from the public domain • planter boxes Note: structures designed to accommodate green walls should be integrated into the building facade and consider the ability of the facade to change over time	This DA submission includes a detailed landscape design concept which incorporates sophisticated strategies for planting solutions on structures including the Village Square (TRG) and RACF roof top garden.	**YES**
4Q Universal Design		
Objective 4Q-1 Universal design features are included in apartment design to promote flexible housing for all community members **Design guidance** • Developments achieve a benchmark of 20% of the total apartments incorporating the Liveable Housing Guideline's silver level universal design features	As a retirement village and RACF all dwellings and rooms are designed to achieve universal design principles noting that 100% of the ILU Apartments will be Adaptable Class C dwellings.	**YES**
Objective 4Q-2 A variety of apartments with adaptable designs are provided **Design guidance**	Refer to Objective 4Q-1 noting all ILU Apartments: • Have convenient access to communal and public areas • Have high level of solar access and or views/outlook • Have minimal structural change and residential amenity loss when adapted	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Adaptable housing should be provided in accordance with the relevant council policy • Design solutions for adaptable apartments include: • convenient access to communal and public areas • high level of solar access • minimal structural change and residential amenity loss when adapted • larger car parking spaces for accessibility • parking titled separately from apartments or shared car parking arrangements	Also, the proposal includes a provision for larger car parking spaces for accessibility and parking titled separately from apartments or shared car parking arrangements	
Objective 4Q-3 Apartment layouts are flexible and accommodate a range of lifestyle needs **Design guidance** Apartment design incorporates flexible design solutions which may include: • rooms with multiple functions • dual master bedroom apartments with separate bathrooms • larger apartments with various living space options • open plan 'loft' style apartments with only a fixed kitchen, laundry and bathroom	The development proposal includes a variety of ILU Apartment types to meet the needs of a broad potential resident base.	**YES**
4R Adaptive reuse		
Objective 4R-1 New additions to existing buildings are contemporary and complementary and enhance an area's identity and sense of place **Design guidance** • Design solutions may include: • new elements to align with the existing building • additions that complement the existing character, siting, scale, proportion, pattern, form and detailing	Not Applicable	**NA**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• use of contemporary and complementary materials, finishes, textures and colours • Additions to heritage items should be clearly identifiable from the original building • New additions allow for the interpretation and future evolution of the building		
Objective 4R-2 Adapted buildings provide residential amenity while not precluding future adaptive reuse **Design guidance** • Design features should be incorporated sensitively into adapted buildings to make up for any physical limitations, to ensure residential amenity is achieved. Design solutions may include: • generously sized voids in deeper buildings • alternative apartment types when orientation is poor • using additions to expand the existing building envelope • Some proposals that adapt existing buildings may not be able to achieve all of the design criteria in this Apartment Design Guide. Where developments are unable to achieve the design criteria, alternatives could be considered in the following areas: • where there are existing higher ceilings, depths of habitable rooms could increase subject to demonstrating access to natural ventilation, cross ventilation (when applicable) and solar and daylight access (see also sections 4A Solar and daylight access and 4B Natural ventilation) • alternatives to providing deep soil where less than the minimum requirement is currently available on the site • building and visual separation – subject to demonstrating alternative design approaches to achieving privacy • common circulation • car parking • alternative approaches to private open space and balconies	Not Applicable	**NA**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
4S Mixed use		
Objective 4S-1 Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement **Design guidance** • Mixed use development should be concentrated around public transport and centres • Mixed use developments positively contribute to the public domain. Design solutions may include: • development addresses the street • active frontages are provided • diverse activities and uses • avoiding blank walls at the ground level • live/work apartments on the ground floor level, rather than commercial	This is a mixed-use development focused on care of seniors, the uses that accompany the ILU are: • a new Residential Care Facility; • retained Croatian Catholic Church; and • retained community hall. • Various ancillary uses such as a gym, wellness centre, club house, café, chapel, Seniors Day Care Centre, Mens' Shed, multipurpose cinema room. The site is adjacent to a local centre and high-frequency bus stops that are accessible on concrete footpaths. All these facilities are within 400m of the site.	**YES**
Objective 4S-2 Residential levels of the building are integrated within the development, and safety and amenity is maximised for residents **Design guidance** • Residential circulation areas should be clearly defined. Design solutions may include: • residential entries are separated from commercial entries and directly accessible from the street • commercial service areas are separated from residential components • residential car parking and communal facilities are separated or secured • security at entries and safe pedestrian routes are provided • concealment opportunities are avoided • Landscaped communal open space should be provided at podium or roof level	The ILU building is separate to the RACF and retained church and hall buildings. A well-defined central entry off Bellevue Road is provided and secondary entries of the public square.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
4T Awnings and signage		
Objective 4T-1 Awnings are well located and complement and integrate with the building design **Design guidance** • Awnings should be located along streets with high pedestrian activity and active frontages • A number of the following design solutions are used: • continuous awnings are maintained and provided in areas with an existing pattern • height, depth, material and form complements the existing street character • protection from the sun and rain is provided • awnings are wrapped around the secondary frontages of corner sites • awnings are retractable in areas without an established pattern • Awnings should be located over building entries for building address and public domain amenity • Awnings relate to residential windows, balconies, street tree planting, power poles and street infrastructure • Gutters and down pipes should be integrated and concealed • Lighting under awnings should be provided for pedestrian safety	Small awnings have been provided where appropriate over building entries to provide weather protection to access doors.	**YES**
Objective 4T-2 Signage responds to the context and desired streetscape character **Design guidance** • Signage should be integrated into the building design and respond to the scale, proportion and detailing of the development • Legible and discrete way finding should be provided for larger developments	Signage has been designed to integrated into the building design and streetscape presentation. The signage is appropriately sized and will respond to the design streetscape character.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Signage is limited to being on and below awnings and a single facade sign on the primary street frontage		
4U Energy efficiency		
Objective 4U-1 Development incorporates passive environmental design **Design guidance** • Adequate natural light is provided to habitable rooms (see 4A Solar and daylight access) • Well located, screened outdoor areas should be provided for clothes drying	A BASIX certificate is included which identifies that the proposed development achieves the required level of thermal comfort for a development of this scale.	**YES**
Objective 4U-2 Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer **Design guidance** • A number of the following design solutions are used: • the use of smart glass or other technologies on north and west elevations • thermal mass in the floors and walls of north facing rooms is maximised • polished concrete floors, tiles or timber rather than carpet • insulated roofs, walls and floors and seals on window and door openings • overhangs and shading devices such as awnings, blinds and screens • Provision of consolidated heating and cooling infrastructure should be located in a centralised location (e.g. the basement	A BASIX certificate is included in the DA documentation which identifies that the proposed development achieves the required level of thermal comfort for a development of this scale.	**YES**
Objective 4U-3 Adequate natural ventilation minimises the need for mechanical ventilation. **Design guidance** A number of the following design solutions are used:	As above, the design satisfies the natural ventilation design criteria requirements.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• rooms with similar usage are grouped together • natural cross ventilation for apartments is optimised • natural ventilation is provided to all habitable rooms and as many non-habitable rooms, common areas and circulation spaces as possible		
4V Water management and conservation		
Objective 4V-1 Potable water use is minimised **Design guidance** • Water efficient fittings, appliances and wastewater reuse should be incorporated • Apartments should be individually metered • Rainwater should be collected, stored and reused on site • Drought tolerant, low water use plants should be used within landscaped areas	Potable water will be minimised where possible. The BASIX certificate included identifies that the development achieves compliance with water efficiency requirements.	**YES**
Objective 4V-2 Urban stormwater is treated on site before being discharged to receiving waters **Design guidance** • Water sensitive urban design systems are designed by a suitably qualified professional • A number of the following design solutions are used: • runoff is collected from roofs and balconies in water tanks and plumbed into toilets, laundry and irrigation • porous and open paving materials is maximised • on site stormwater and infiltration, including bio-retention systems such as rain gardens or street tree pits	Stormwater will be treated/managed on site – refer to Civil Engineers documentation.	**YES**
Objective 4V-3 Flood management systems are integrated into site design	Stormwater will be treated/managed on site – refer to Civil Engineers documentation.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
Design guidance • Detention tanks should be located under paved areas, driveways or in basement car parks • On large sites parks or open spaces are designed to provide temporary on site detention basins		
4W Waste management		
Objective 4W-1 Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents **Design guidance** • Adequately sized storage areas for rubbish bins should be located discreetly away from the front of the development or in the basement car park • Waste and recycling storage areas should be well ventilated • Circulation design allows bins to be easily manoeuvred between storage and collection points • Temporary storage should be provided for large bulk items such as mattresses • A waste management plan should be prepared	Waste storage is discretely located in basement areas and conveniently accessed from the lifts. These have been carefully designed to be well ventilated, easily manoeuvred and supported by an integrated waste management plan as per the Civil Engineering documentation.	**YES**
Objective 4W-2 Domestic waste is minimised by providing safe and convenient source separation and recycling **Design guidance** • All dwellings should have a waste and recycling cupboard or temporary storage area of sufficient size to hold two days worth of waste and recycling • Communal waste and recycling rooms are in convenient and accessible locations related to each vertical core • For mixed use developments, residential waste and recycling storage areas and access should be separate and secure from other uses	The DA documentation includes an integrated waste management strategy including domestic waste and recycling strategies and infrastructure as per the Civil Engineers documentation.	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• Alternative waste disposal methods such as composting should be provide		
4X Building maintenance		
Objective 4X-1 Building design detail provides protection from weathering **Design guidance** A number of the following design solutions are used: • roof overhangs to protect walls • hoods over windows and doors to protect openings • detailing horizontal edges with drip lines to avoid staining of surfaces • methods to eliminate or reduce planter box leaching • appropriate design and material selection for hostile locations	As a long-term asset for Adria Care, the proposed new development is designed to stand the test of time and design decisions and material selections will ensure the life cycle costs are a key consideration. In this regard: • Resilient / low maintenance materials / systems have been selected for façade. roof and fenestration elements • Balconies tend to be in-board and afforded natural weather protection	**YES**
Objective 4X-2 Systems and access enable ease of maintenance **Design guidance** • Window design enables cleaning from the inside of the building • Building maintenance systems should be incorporated and integrated into the design of the building form, roof and facade • Design solutions do not require external scaffolding for maintenance access • Manually operated systems such as blinds, sunshades and curtains are used in preference to mechanical systems • Centralised maintenance, services and storage should be provided for communal open space areas within the building	As with objective 4X-1, ease of maintenance is also a key consideration for Adria Care and in this regard: • Window design enable cleaning from the inside of the building • All plant equipment is accessible • Centralised maintenance, services and storage is provided for communal open space areas within the building	**YES**
Objective 4X-3 Material selection reduces ongoing maintenance costs **Design guidance** A number of the following design solutions are used:	As with objective 4X-1, reduction on ongoing maintenance costs is also a key consideration for Adria Care and in this regard: • Sensors will control artificial lighting in common circulation and spaces	**YES**

SEPP 65 Apartment Design Guidelines	Proposal	Compliance
• sensors to control artificial lighting in common circulation and spaces • natural materials that weather well and improve with time such as face brickwork • easily cleaned surfaces that are graffiti resistant • robust and durable materials and finishes are used in locations which receive heavy wear and tear, such as common circulation areas and lift interiors	• Natural materials that weather well and improve with time such as face brickwork have been incorporated • Easily cleaned surfaces that are graffiti resistant have been incorporated • Robust and durable materials and finishes are used in locations which receive heavy wear and tear, such as common circulation areas and lift interiors	

4. Design Verification Statement

This Statement is to be read in conjunction with the Statement of Environmental Effects prepared by Capital Region Planning.

This Statement is to confirm that Alastair MacCallum has directed the design of the proposed Independent Living Unit building at 7 - 13 Bellevue Road, 2 Benney Avenue and 38 - 40 Princess Highway, Fig Tree. We confirm that the design quality principles set out in the State Environmental Planning Policy No. 65 and its Apartment Design Guide – are satisfied in this design; these principles are outlined in this report.

Alastair MacCallum
NSW Architects Registration Board ACT #1002
Date: 23/12/2021