# ATTACHMENT 8 – SEPP 65 Apartment Design Guide compliance

| Standards/controls  | Comment  | Complies? |
|---|--|-----------|
| Part 1 – Identifying the context  |  |           |
| <ul> <li><u>1A Apartment building types</u></li> <li>Generic apartment building types can be used to:</li> <li>Determine the appropriate scale of future built form</li> <li>Communicate the desired character of an area</li> </ul>        | The development comprises a shared<br>podium and two towers, with each<br>tower at the maximum respective height<br>limit of 24m and 48m.  | Yes       |
| - Assist when testing envelope and development controls to achieve high amenity and environmental performance.  |  |           |
| <b><u>1B Local character and context</u></b><br>This guideline outlines how to define the setting and<br>scale of a development, and involves consideration<br>of the desired future character, common settings and<br>the range of scales. | A context analysis was undertaken by<br>the applicant and refined over<br>successive Design Review Panel<br>(DRP) meetings. It models likely<br>development on adjoining sites and<br>tests the proposed building form for<br>compatibility in the neighbourhood.  | Νο        |
|   | The DRP noted it is unreasonable for a development to not comply with building controls if it would compromise development opportunities on neighbouring land.   |           |
|   | The context plans address only those<br>immediately adjoining allotments<br>whereas a wider extent would have<br>provided a more thorough basis with<br>which to assess the non-complying<br>setbacks and test susceptibility to future<br>neighbouring development. The DRP<br>specifically requested modelling occur<br>to test potential overshadowing of the<br>northern apartments should land to the<br>north be redeveloped. This has been<br>done and shows a potential 67% solar<br>access rate, where the ADG requires<br>70%. |           |
|   | Potential future shadow elevations<br>(sheets A406 A and A 407 A) indicate<br>overshadowing impacts if land to the<br>north and south was redeveloped.<br>These hypothetical buildings correlate<br>with the context analysis on sheet<br>A015A, however appear only to include<br>the applicant's residential scenario. The<br>building footprint and heights for non-<br>residential shown on sheet A015A are<br>different to residential and would result<br>in different overshadowing impacts.                                      |           |
|   | The future buildings scenarios assume land to the north and south is not   |           |

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|   | consolidated in the same way as the<br>proposed development (i.e. Keira<br>through to Kenny Streets), and<br>therefore anticipate a break in the<br>centre which may not eventuate.   |           |
|   | Land to the north and south has the<br>same height and FSR controls as the<br>subject site, and it could be expected<br>that consolidation of more lots than<br>those shown on the context analysis<br>might occur. In that event, buildings of<br>a larger scale and height than depicted<br>on the context analysis could be<br>proposed. |           |
|   | Further, the setbacks indicated on<br>residential scenario Figure 2 (sheet<br>A015 A) would not comply with the<br>ADG. It appears that north and south<br>elevations on these lots are treated<br>entirely as non-habitable, which is<br>unrealistic.  |           |
| 1C Precincts and individual sites   |   |           |
| <ul> <li>Individual sites:</li> <li>New development on individual sites within an established area should carefully respond to neighbouring development, and also address the desired future character at the neighbourhood and street scales. Planning and design considerations for managing this include:</li> <li>Site amalgamation where appropriate</li> <li>Corner site and sites with multiple frontages can be more efficient than sites with single frontages</li> <li>Ensure the development potential for adjacent sites is retained</li> <li>Avoid isolated sites that are unable to realise the development potential.</li> </ul> | The site is comprised of four allotments,<br>providing two street frontages. The<br>building extends east west from Keira to<br>Kenny Streets.<br>Consolidation of allotments is required.<br>The potential redevelopment of<br>adjoining sites is shown on sheet A015<br>A. Refer to comments above.                                       | Yes       |
| 3A Site analysis  | Written statement provided  | Yes       |
| Site analysis uses the following key elements to<br>demonstrate that design decisions have been based<br>on opportunities and constraints of the site<br>conditions and their relationship to the surrounding<br>context.<br>A written statement explaining how the design of the<br>proposed development has responded to the site<br>analysis must accompany the development  | Written statement provided.<br>Site analysis plan provided.<br>Survey undertaken.<br>Sheet A007I identifies the location of<br>easements and restrictions.<br>Aerial and existing streetscape photos<br>provided.   | Tes       |
| application.  |   |           |

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| Buildings must be oriented to maximise northern<br>orientation, response to desired character, promote<br>amenity for the occupant and adjoining properties,<br>retain trees and open spaces and respond to<br>contextual constraints such as overshadowing and | The bulk of apartments are oriented to<br>the north, which maximises solar<br>access but leaves apartments<br>susceptible to overshadowing impacts<br>of future redevelopment to the north.          | Yes       |
| noise.<br><u>Objective 3B-1:</u>  | Both towers have lobbies oriented north into the through site link.  |           |
| Building types and layouts respond to the streetscape and site while optimising solar access within the development   | The main communal open space area<br>is located on Level 6, which would<br>receive morning and midday sunlight.  |           |
| Design Guidance   | Redevelopment of land to the north could overshadow this space.  |           |
| <ul> <li>Buildings should define the street by facing it and<br/>providing direct access.</li> </ul>  | Additional communal open space on Level 1 is located on the southern side  |           |
| Objective 3B-2  | of the podium and is not expected to receive substantial sunlight.   |           |
| Overshadowing of neighbouring properties is<br>minimised during mid- winter   | Both street frontages have direct access via ramps and steps. The Keira  |           |
| Design Guidance   | Street elevation has a café and outdoor terrace which activates this elevation.  |           |
| <ul> <li>Overshadowing should be minimised to the south<br/>or downhill by increased upper level setbacks</li> </ul>  | Kenny Street is less successful, with an office premises accessed directly from  |           |
| - Refer sections 3D & 4A below for solar access requirements  | the boundary via several steps. A 1.5m wide terrace area adjoins the access  |           |
| - A minimum of 4 hours of solar access should be retained to solar collectors on neighbouring buildings   | ramp from Kenny Street which is<br>narrower than other terraces on the<br>podium and users may feel cramped.   |           |
| buildings   | Shadow diagrams are provided on plans A401J, A402D, A403DA404D and A405B.  |           |
| 3C Public domain interface  |  |           |
| Key components to consider when designing the interface include entries, private terraces or  | The ground floor has been raised in response to flooding calculations.   | Yes       |
| balconies, fences and walls, changes in level, services locations and planting.   | An undercroft flood conveyance area is partially shielded from the through site  |           |
| The design of these elements can influence the real<br>or perceived safety and security of residents,   | link and public domain by raised planters.   |           |
| opportunities for social interaction and the identity of<br>the development when viewed from the public<br>domain   | Access ramps are provided at both Keira and Kenny Streets.   |           |
| Objective 3C-1:   | The application proposes no  |           |
| Transition between private and public domain is achieved without compromising safety and security   | mechanism for ensuring ongoing public access in the through site link.   |           |
| Design Guidance   | The management of the right of way<br>and easement for parking by residents  |           |
| <ul> <li>Terraces, balconies and courtyards should have<br/>direct street entry, where appropriate</li> </ul>   | and tenants of the proposed development is unclear. Further detail is needed as to how the legal rights of   |           |
| - Changes in level between private terraces etc.<br>above street level provide surveillance and<br>improved visual privacy for ground level<br>dwellings.   | the benefiting land will be maintained<br>once the building is constructed. For<br>example, how will parking in the<br>easement by residents or tenants of the<br>proposed development be prevented? |           |

| Standards/controls  | Comment   | Complies? |
|---|---|-----------|
| - Front fences and walls along street frontages should use visually permeable materials and   | How will conflict between pedestrians and vehicles be managed in this area?   |           |
| treatments. The height of solid fences or walls should be limited to 1m.  | Street tree planting and other public domain works are shown on the   |           |
| <ul> <li>Opportunities should be provided casual<br/>interaction between residents and the public</li> </ul>                          | landscape plan.   |           |
| domain e.g. seating at building entries, near letterboxes etc.  | Waste rooms and the bin collection<br>area are located on ground level out of<br>sight from the public domain.                                      |           |
| Objective 3C-2:   | One internal substation is proposed on  |           |
| Amenity of the public domain is retained and<br>enhanced  | the Kenny Street frontage.<br>Raised planters are used on the Keira   |           |
| Design Guidance   | Street frontage to alleviate the raised   |           |
| - Planting softens the edges of any raised terraces to the street (e.g. basement podium)  | floor level of the ground floor and disguise the undercroft flood conveyance area.  |           |
| - Mailboxes should be located in lobbies perpendicular to street alignment or integrated  | Mailboxes are located adjacent to each  |           |
| into front fences.  | tower lift lobby.   |           |
| - Garbage storage areas, substations, pump rooms and other service requirements should be located in basement car parks.              | The Keira Street frontage is located<br>opposite MacCabe Park. The Keira<br>Street tower has a reduced height as<br>required by WLEP 2009. Locating |           |
| - Durable, graffiti resistant materials should be used  | communal open space on the eastern tower appropriately visually connects  |           |
| - Where development adjoins public parks or open space the design should address this interface.                                      | with the park.  |           |
| 3D Communal and public open space   |   |           |
| Objective 3D-1  | Minimum 25% of 2582.9m <sup>2</sup> site =  | Yes       |
| An adequate area of communal open space is<br>provided to enhance residential amenity and to<br>provide opportunities for landscaping | 645.72 $m^2$ . Sheet A504I provides $m^2$ of the COS.   |           |
| Design Criteria   | The principal communal open space area on Level 6 is shown on Sheet   |           |
| <ul> <li>1.Communal open space has a minimum area of 25% of the site area</li> </ul>  | A504I as being 570m2, consisting of landscaped areas, indoor common room and paved areas.   |           |
| 2. 50% direct sunlight provided to principal usable   |   |           |
| part of communal open space for a minimum of 2 hours between 9am and 3pm on 21 June   | The additional communal open space area on Level 1 is approximately shown as 202m <sup>2</sup> .  |           |
| Design Guidance   | Additional communal open space is   |           |
| <ul> <li>Communal open space should be consolidated into a well-designed, usable area.</li> </ul>                                     | located at ground level, in the though site link.   |           |
| - Minimum dimension of 3m   | The Level 6 area receives minimum 2hrs (refer shadow diagram).  |           |
| - Should be co-located with deep soil areas   |   |           |
| - Direct & equitable access required  | In the current design, there is no way to reach the outdoor communal open   |           |
| - Where not possible at ground floor it should be located at podium or roof level.  | space area without walking through the indoor common room. This is not ideal  |           |
| - Where developments are unable to achieve the design criteria, such as on small lots, sites within                                   | as the common room might be used for<br>private functions like parties or<br>meetings.  |           |

| Standards/controls  | Comment  | Complies |
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| business zones, or in a dense urban area, they should:  |  |          |
| <ul> <li>provide communal spaces elsewhere such<br/>as a landscaped roof top terrace or a<br/>common room</li> </ul>  |  |          |
| <ul> <li>provide larger balconies or increased private<br/>open space for apartments</li> </ul>   |  |          |
| <ul> <li>demonstrate good proximity to public open<br/>space and facilities and/or provide<br/>contributions to public open space</li> </ul>  |  |          |
| Objective3D-2   |  |          |
| Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting   |  |          |
| Design guidance   |  |          |
| <ul> <li>Facilities to be provided in communal open<br/>spaces for a range of age groups, and may<br/>incorporate seating, barbeque areas, play<br/>equipment, swimming pools</li> </ul>  |  |          |
| <u>Objective 3D-3</u>   |  |          |
| Communal open space is designed to maximise safety  |  |          |
| Design guidance   |  |          |
| <ul> <li>Communal open space should be visible from<br/>habitable rooms and POS areas and should be<br/>well lit.</li> </ul>  |  |          |
| Objective 3D-4  |  |          |
| Public open space, where provided, is responsive to<br>the existing pattern and uses of the neighbourhood<br>(N/A in most cases)  |  |          |
| <u>3E Deep soil zones</u>   |  |          |
| <u>Objective 3E-1</u>   | Minimum dimension of 6.0m required, with minimum area of $180.80m^2$ (7%).   | Νο       |
| 3E-1 Deep soil zones provide areas on the site that<br>allow for and support healthy plant and tree growth.<br>They improve residential amenity and promote<br>management of water and air quality.                               | The landscape plan does not identify<br>any deep soil zone, however sheet<br>A504I says 180m <sup>2</sup> of deep soil is  |          |
| Design Criteria:  | provided.  |          |
| <ol> <li>Deep soil zones for sites exceeding 1500m<sup>2</sup> are<br/>to meet the following minimum requirements:<br/>7% of site area, 6m dimension<br/><u>Design guidance:</u></li> </ol>                                       | Whilst the application refers to<br>achievement of 7% deep soil zone, it is<br>noted that the only part of the site that<br>is landscaped at ground level is also<br>affected by the drainage easement and |          |
| <ul> <li>Deep soil zones should be located to retain<br/>existing significant trees.</li> </ul>   | contains existing underground drainage infrastructure.   |          |
| <ul> <li>Achieving design criteria may not be possible on<br/>some sites including where; there is 100% site<br/>coverage or non-residential uses at ground floor<br/>level or the location and building typology have</li> </ul> | No deep soil zone (areas of minimum dimension, planted with significant  |          |

| Standards/controls  | Comment  | Complies? |
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| limited or no space for deep soil at ground level<br>(e.g. central business district, constrained sites,<br>high density areas, or in centres).   | trees and not sitting over drainage infrastructure) is provided.   |           |
| <u>3F Visual privacy</u>  |  |           |
| Objective 3F-1  |  |           |
| Adequate building separation distances are shared<br>equitably between neighbouring sites, to achieve<br>reasonable levels of external and internal visual<br>amenity.                    | All adjoining buildings are 1-2 storeys<br>and are not currently used for<br>residential purposes.   | Νο        |
| Design Criteria:  | The development contains the following setbacks:   |           |
| For buildings up 12m (4 storeys) the minimum required separation distances from buildings to the  | up 12m (4 storeys) - Ground-Level 3  |           |
| side and rear boundaries are as follows: 6m<br>habitable rooms and balconies and 3m non-<br>habitable rooms.  | habitable: minimum nil setback Level 1<br>POS where 6m required (south);<br>minimum 8m where 6m required (north)   |           |
| For buildings up to 25m (5-8 storeys): 9m habitable rooms and balconies and 4.5m non-habitable rooms.   | non-habitable: minimum nil setback<br>where 4.5m required (south); minimum<br>6m where 3m required (north)   |           |
| For buildings over 25m (9 storeys): 12m habitable   | up to 25m (5-8 storeys): Levels 4-7  |           |
| rooms and balconies and 6m non-habitable rooms.<br>Separation distances between towers on same site<br>should combine required building separations.<br><u>Design Guidance</u>            | habitable: minimum 1m where ADG<br>requires 9m (south); COS 2m setback<br>where 9m required (south); minimum<br>8m where 9m required (north)                     |           |
| - Apartment buildings should have an increased separation distance of 3m (in addition to the above requirements) when adjacent to a different zone that permits lower density residential | non-habitable: minimum nil setback<br>where 4.5m required (south); no non-<br>habitable areas on northern elevation.<br><u>over 25m (9 storeys): Levels 8-14</u> |           |
| <ul> <li>development to provide for a transition in scale.</li> <li>Direct lines of sight should be avoided for windows and balconies across corners</li> </ul>                           | habitable: minimum 6m where 12m required (south); minimum 11m where 12m required (north)   |           |
| - No separation is required between blank walls   | non-habitable: minimum 6m where 6m   |           |
| Objective 3F-2:   | required (south); no non-habitable areas on northern elevation.  |           |
| Site and building design elements increase privacy<br>without compromising access to light and air and<br>balance outlook and views from habitable rooms and<br>private open space        | Communal open space on Levels 1 and<br>6 is not adequately separated from<br>private open space e.g. COS covered   |           |
| Design Guidance   | area Level 6 directly adjoins outdoor terrace of apartment 604 and has same  |           |
| <ul> <li>Communal open space, common areas and<br/>access paths should be separated from private<br/>open space and windows to apartments. Design<br/>solutions include:</li> </ul>       | floor level; Level 1 COS adjoins POS of apartments 101, 107, 108 and 113 at same floor level.  |           |
| · Setbacks,   |  |           |
| Solid or partly solid balustrades to balconies  |  |           |
| <ul> <li>Fencing or vegetation to separate spaces</li> </ul>  |  |           |
| Screening devices   |  |           |
|   |  |           |

| Sidilua        | ards/controls   | Comment   | Complies? |
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| •              | Raising apartments/private open space above the public domain   |   |           |
| •              | Planter boxes incorporated into walls and balustrades to increase visual separation   |   |           |
| •              | Pergolas or shading devices to limit overlooking  |   |           |
|                | Only on constrained sites where it's demonstrated that building layout opportunities are limited – fixed louvres or screen panels |   |           |
|                | dows should be offset from the windows of<br>bining buildings   |   |           |
| 3G Peo         | destrian access and entries   |   |           |
| Objecti        | ive 3G-1  |   |           |
|                | g entries and pedestrian access connects to<br>dresses the public domain  | The main building entries (lift lobbies) are located on the northern elevation.   | Νο        |
| Design         | Guidance  | From Keira and Kenny Streets, pedestrians will have to identify ramps   |           |
|                | tiple entries should be provided to activate the et edge.   | or steps to terrace areas and then walk<br>around to find the lift lobbies.   |           |
| and            | dings entries should be clearly identifiable<br>communal entries should be clearly<br>inguishable from private entries.           | A through site link has been proposed,<br>but it is unclear whether it will operate<br>as a publicly accessible pedestrian path |           |
| Objecti        | ive 3G-2  | as required by WDCP 2009. The applicant has advised Council it does   |           |
|                | s, entries and pathways are accessible and<br>o identify  | not intend to enter into a planning agreement to dedicate this land to  |           |
| Design         | Guidance  | Council.  |           |
|                | ding access areas should be clearly visible<br>n the public domain and communal spaces  |   |           |
|                | os and ramps should be integrated into the rall building and landscape design.  |   |           |
| <u>Objecti</u> | ive 3G-3  |   |           |
| •              | sites provide pedestrian links for access to<br>and connection to destinations  |   |           |
| <u>3H Veł</u>  | nicle access  |   |           |
| <u>Objecti</u> | ive 3H-1  | All existing driveways are to be  | No        |
| achieve        | rians and vehicles and create high quality  | demolished.<br>The vehicle driveway is located on the<br>southern side of Keira Street. The<br>driveway leads to three basement |           |
| Design         | Guidance  | levels. The third basement was recently added and does not appear on sections   |           |
|                | park entries should be located behind the ding line   | or elevations.  |           |

| Standards/controls  | Comment   | Complies? |
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| <ul> <li>Access point locations should avoid headlight<br/>glare to habitable rooms</li> <li>Garbage collection, loading and service areas<br/>should be screened</li> <li>Vehicle and pedestrian access should be clearly<br/>separated to improve safety.</li> <li>Where possible, vehicle access points should not<br/>dominate the streetscape and be limited to the</li> </ul> | The Kenny Street driveway servicing<br>the parking easement and right of way<br>benefiting 21 Kenny has been relocated<br>further north than the existing driveway.<br>A submission from 21 Kenny has<br>indicated that the new location would<br>not allow vehicle access into 21 Kenny<br>without compromising the existing car<br>parking spaces in the easement area. |           |
| minimum width possible.   | Garbage collection would occur via the<br>loading bay on ground level. Council's<br>traffic engineer has requested this area<br>accommodate 10.24m vehicles,<br>however this has not yet been<br>demonstrated.<br>It is unclear how pedestrian and vehicle<br>conflict will be managed in the right of<br>way and parking easement area.                                  |           |
| 3J Bicycle and car parking  |   |           |
| Objective 3J-1  | The land is located within the B3   | No        |
| Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas   | Commercial Core zone. Therefore, the<br>lesser of RMS or WDCP 2009 applies<br>to the residential component. In this<br>case, the lesser is RMS. WDCP 2009   |           |
| Design Criteria   | applies to the business/retail  |           |
| On land zoned, and sites within 400m of land zoned<br>B3 Commercial Core or B4 Mixed Use, or equivalent<br>in a nominated regional centre;  | component – Refer WDCP 2009<br>discussion Attachment 9.<br>The proposed provision of 8<br>commercial parking spaces is less than<br>the 11 spaces required by WDCP 2009.<br>Residential parking spaces include a<br>surplus which has been calculated as<br>gross floor area in accordance with<br>WLEP 2009.   |           |
| The minimum car parking requirement for residents and visitors is set out in the RMS Guide To Traffic Generating Development, or Council's car parking requirement, whichever is less.  |   |           |
| The car parking needs for a development must be provided off street.  |   |           |
| Objective 3J-2  | Council's traffic engineer has requested that the basement roller door not block  |           |
| Parking and facilities are provided for other modes of transport  | manoeuvring. This has not yet been demonstrated.  |           |
| Design Guidance   | Car parking areas are accessible from lift lobbies.   |           |
| <ul> <li>Conveniently located and sufficient numbers of<br/>parking spaces should be provided for<br/>motorbikes and scooters</li> </ul>  |   |           |
| <ul> <li>Secure undercover bicycle parking should be<br/>provided that is easily accessible from both the<br/>public domain and common areas.</li> </ul>  |   |           |
| Objective 3J-3  |   |           |
| Car park design and access is safe and secure   |   |           |
| <u>Design Guidance</u>  |   |           |

| Standards/controls  | Comment   | Complies? |
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| <ul> <li>Supporting facilities within car parks (garbage<br/>rooms, storage areas, car wash bays) can be<br/>accessed without crossing parking spaces</li> </ul>        |   |           |
| - A clearly defined and visible lobby or waiting area should be provided to lifts and stairs.   |   |           |
| - Permeable roller doors allow for natural ventilation and improve the safety of car parking areas by enabling passive surveillance.                                    |   |           |
| Objective 3J-4  |   |           |
| Visual and environmental impact of underground car parking are minimised  |   |           |
| Design Guidance   |   |           |
| - Excavation should be minimised through efficient carpark layouts and ramp design.   |   |           |
| - Protrusion of carparks should not exceed 1.0m above ground level.   |   |           |
| - Natural ventilation should be provided to basement and sub-basement car parking areas.  |   |           |
| - Ventilation grills or screening devices should be integrated into the façade and landscape design.  |   |           |
| <u>Objective 3J-5</u>   |   |           |
| Visual and environmental impacts of on-grade car parking are minimised  |   |           |
| - On grade car parking should be avoided  |   |           |
| - Design guidelines provided where it's unavoidable   |   |           |
| Objective 3J-6  |   |           |
| Visual and environmental impacts of ground enclosed car parking are minimised   |   |           |
| - Exposed parking should not be located along primary street frontages  |   |           |
| - Positive street address and active street frontages should be provided at ground level.   |   |           |
| Part 4 – Designing the building - Amenity   |   |           |
| 4A Solar and daylight access  |   |           |
| Objective 4A-1  | Sheet A002I indicates 87% of  | Yes       |
| To optimise the number of apartments receiving<br>sunlight to habitable rooms, primary windows and<br>private open space  | apartments would receive 2 hours of sunlight. It is unclear whether this refers to living areas or POS (or both). |           |
| Design Criteria   | Sheet A002I notes that 16% would  |           |
| <ol> <li>Living rooms and private open spaces of at least<br/>70% of apartments in a building receive a<br/>minimum of two (2) hours direct sunlight between</li> </ol> | receive no direct sunlight between 9am and 3pm.   |           |
| 9am and 3pm in mid-winter in Wollongong LGA.  | Sheets A406A and A407A show potential shadowing of the proposed   |           |

| Standards/controls  | Comment   | Complies? |
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| <ol> <li>A maximum of 15% of apartments in a building<br/>receive no direct sunlight between 9am and 3pm<br/>at mid-winter</li> </ol>   | apartments should land to the north be<br>redeveloped. Shadow impacts have<br>been quantified at 67%, however the |           |
| Design Guidance   | potential building form does not accommodate lot consolidation and  |           |
| <ul> <li>The design maximises north aspect and the<br/>number of single aspect south facing apartments<br/>is minimised</li> </ul>  | therefore the potential built form may be<br>larger.<br>Screens and awnings are provided to                       |           |
| <ul> <li>To optimise the direct sunlight to habitable rooms<br/>and balconies, the following design features are<br/>used:</li> </ul>   | some apartments.  |           |
| Dual aspect,  |   |           |
| Shallow apartment layouts   |   |           |
| Bay windows   |   |           |
| <ul> <li>To maximise the benefit to residents, a minimum<br/>of 1m<sup>2</sup> of direct sunlight measured at 1m above<br/>floor level, is achieved for at least 15 minutes.</li> </ul> |   |           |
| Objective 4A-2  |   |           |
| Daylight access is maximised where sunlight is limited  |   |           |
| Design Guidance   |   |           |
| <ul> <li>Courtyards, skylights and high level windows (sill<br/>heights of 1500m or greater) are used only as<br/>secondary light sources in habitable rooms</li> </ul>                 |   |           |
| Objective 4A-3  |   |           |
| Design incorporates shading and glare control, particularly for warmer months   |   |           |
| Design Guidance   |   |           |
| Design features can include:  |   |           |
| - Balconies   |   |           |
| - Shading devices or planting   |   |           |
| - Operable shading  |   |           |
| <ul> <li>High performance glass that minimises external<br/>glare</li> </ul>  |   |           |
| 4B natural ventilation  |   |           |
| <u>Objective 4B-1</u>   | Sheet A002I indicates that 63% of   | Yes       |
| All habitable rooms are naturally ventilated.   | apartments are cross ventilated.  |           |
| Design Guidance   |   |           |
| <ul> <li>A building's orientation should maximise the<br/>prevailing winds for natural ventilation in<br/>habitable rooms</li> </ul>  |   |           |
| <ul> <li>The area of unobstructed window openings<br/>should be equal to at least 5% of the floor area<br/>served.</li> </ul>   |   |           |

| Standards/controls   | Comment   | Complies? |
|--|---|-----------|
| <ul> <li>Doors and openable windows should have large openable areas to maximise ventilation.</li> </ul>   |   |           |
| Objective 4B-2   |   |           |
| The layout and design of single aspect apartments maximises natural ventilation  |   |           |
| Design Guidance  |   |           |
| <ul> <li>Single aspect apartments should use design<br/>solutions to maximise natural ventilation.</li> </ul>  |   |           |
| Objective 4B-3   |   |           |
| The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents  |   |           |
| Design Criteria:   |   |           |
| 1. 60% of apartments are naturally cross ventilated<br>in the first nine storeys   |   |           |
| 2. Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.  |   |           |
| 4C Ceiling heights   |   |           |
| Objective 4C-1   |   |           |
| Ceiling height achieves sufficient natural ventilation<br>and daylight access  |   |           |
| Design Criteria  | All apartments have 3m floor to floor   | Yes       |
| 1. Minimum 2.7m for habitable rooms and 2.4m for non-habitable rooms   | height.<br>Ground floor has floor to floor height of  |           |
| Objective 4C-2   | minimum 3.85m.  |           |
| Ceiling height increases the sense of space in<br>apartments and provides for well-proportioned<br>rooms   |   |           |
| Objective 4C-3   |   |           |
| Ceiling height contribute to the flexibility of building use over the life of the building   |   |           |
| Design Guidance  |   |           |
| <ul> <li>Ceiling heights of lower level apartments in<br/>centres should be greater than the minimum<br/>required by the design criteria allowing flexibility<br/>and conversion to non-residential uses.</li> </ul> |   |           |
| 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  | A schedule of units has been provided<br>on sheet A002I. All apartment sizes<br>exceed ADG size requirements. | Yes       |
| Design Criteria:   |   |           |

| Standards/controls   | Comment | Complies? |
|--|---------|-----------|
| 1. Minimum internal areas:   |         |           |
| Studio – 35m <sup>2</sup>  |         |           |
| 1 bed – 50m <sup>2</sup>   |         |           |
| 2 bed – 70m <sup>2</sup>   |         |           |
| 3 bed – 90m <sup>2</sup>   |         |           |
| The minimum internal areas include only 1 bathroom. Additional bathrooms increase the minimum internal areas by 5m <sup>2</sup> each.  |         |           |
| <ol> <li>Every habitable room must have a window in an<br/>external wall with a total minimum glass area of<br/>at least 10% of the floor area of the room</li> </ol>                                |         |           |
| Design Guidance:   |         |           |
| <ul> <li>Where minimum areas are not met, need to<br/>demonstrate the usability and functionality of the<br/>space with realistically scaled furniture layouts<br/>and circulation areas.</li> </ul> |         |           |
| Objective 4D-2   |         |           |
| Environmental performance of the apartment is maximised  |         |           |
| Design Criteria:   |         |           |
| <ol> <li>Habitable room depths are limited to a maximum<br/>of 2.5 x ceiling height</li> </ol>   |         |           |
| <ol> <li>In open plan layouts (where the living, dining and<br/>kitchen are combined) the maximum habitable<br/>room depth is 8m from a window.</li> </ol>   |         |           |
| Design Guidance:   |         |           |
| <ul> <li>Greater than the minimum ceiling heights can<br/>allow proportionate increases in room depths.</li> </ul>   |         |           |
| <ul> <li>Where possible, bathrooms and laundries should<br/>have an external openable window.</li> </ul>   |         |           |
| <ul> <li>Main living spaces should be oriented towards<br/>the primary outlook.</li> </ul>   |         |           |
| Objective 4D-3   |         |           |
| Apartment layouts are designed to accommodate a variety of household activities and needs  |         |           |
| Design Criteria:   |         |           |
| <ol> <li>Master bedrooms have a minimum area of 10m<sup>2</sup><br/>and other bedrooms 9m<sup>2</sup> (excl. wardrobe space)</li> </ol>  |         |           |
| 2. Bedrooms have minimum dimension of 3m (excl. wardrobe)  |         |           |
| 3. Living rooms have minimum width of:   |         |           |
| - 3.6m for studio and 1 bed apartments and   |         |           |
| - 4m for 2+ beds.  |         |           |

| Standards/controls   | Comment  | Complies? |
|--|--|-----------|
| <ol> <li>The width of the crossover or cross through<br/>apartments is at least 4m internally to avoid deep<br/>narrow apartment layouts.</li> </ol>         |  |           |
| Design Guidance:   |  |           |
| <ul> <li>Access to bedrooms, bathrooms and laundries is<br/>separated from living areas</li> </ul>   |  |           |
| - Minimum 1.5m length for bedroom wardrobes  |  |           |
| <ul> <li>Main bedroom apartment: minimum 1.8m long x<br/>0.6m deep x 2.1m high wardrobe</li> </ul>   |  |           |
| - Apartment layouts allow for flexibility over time, including furniture removal, spaces for a range of activities and privacy levels within the apartments. |  |           |
| 4E Private open space and balconies  |  |           |
| Objective 4E-1   | Balcony dimensions are shown on floor  | No        |
| Apartments provide appropriately sized private open space and balconies to enhance residential amenity   | plans. All comply, with the exception of apartments 904 on levels 7-13, where $8m^2$ and $2m^2$ balconies are provided                                     |           |
| 1. Minimum primary balcony depths are:   | and a 10m <sup>2</sup> primary balcony is required.  |           |
| 1 bedroom: minimum area 8m <sup>2</sup> , minimum depth 2m   | All primary balconies are located off  |           |
| 2 bedroom: minimum area 10m <sup>2</sup> , minimum depth 2m  | living areas except for apartments 904<br>on levels 7-13, which has the 2m <sup>2</sup><br>balcony located off a bedroom.                                  |           |
| 3+ bedroom: minimum area 12m <sup>2</sup> , minimum depth  |  |           |
| 2.4m   | Generally, the longer side face outwards.  |           |
| The minimum balcony depth to be counted as contributing to the balcony area is 1m.   | Screening devices are provided on<br>some balconies, including on the north<br>elevation.<br>Some apartments have full width clear<br>glazing balustrades. |           |
| 2. Ground level apartment POS must have minimum rea of 15m <sup>2</sup> and min. depth of 3m   |  |           |
| Objective 4E-2   |  |           |
| Primary private open space and balconies are<br>appropriately located to enhance liveability for<br>residents  |  |           |
| Design Guidance  |  |           |
| - Primary private open space and balconies should be located adjacent to the living room, dining room or kitchen to extend the living space.                 |  |           |
| <ul> <li>POS &amp; Balconies should be oriented with the<br/>longer side facing outwards to optimise daylight<br/>access into adjacent rooms.</li> </ul>     |  |           |
| Objective 4E-3   |  |           |
| Primary private open space and balcony design is<br>integrated into and contributes to the overall<br>architectural form and detail of the building          |  |           |
| Design Guidance  |  |           |
| - A combination of solid and transparent materials<br>balances the need for privacy with surveillance of<br>the public domain                                |  |           |

| Standards/controls  | Comment  | Complies? |
|---|--|-----------|
| - Full width glass balustrades alone are not desirable  |  |           |
| <ul> <li>Operable screens etc. are used to control sunlight<br/>and wind, and provide increased privacy for<br/>occupancy while allowing for storage and<br/>external clothes drying.</li> </ul>                          |  |           |
| Objective 4E-4  |  |           |
| Private open space and balcony design maximises safety  |  |           |
| Design Guidance   |  |           |
| - Changes in ground levels or landscaping are minimised.  |  |           |
| 4F Common circulation and spaces  |  |           |
| Objective 4F-1  |  |           |
| Common circulation spaces achieve good amenity and properly service the number of apartments.   | The development contains 2 lifts servicing the Kenny Street tower and one lift for the Keira Street tower. | No        |
| <u>Design Criteria</u>  |  |           |
| 1. The maximum number of apartments off a circulation core on a single level is eight   | Maximum number of dwellings off a lift is seven.   |           |
| 2. For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.  | The Kenny Street lift corridor is approximately 16m long and is not relieved by seating or articulation.   |           |
| Design Guidance   |  |           |
| - Long corridors greater than 12m in length should be articulated through the use of windows or seating.  |  |           |
| - Primary living rooms or bedroom windows should<br>not open directly onto common circulation<br>spaces, whether open or enclosed. Visual and<br>acoustic privacy from common circulation spaces<br>should be controlled. |  |           |
| Objective 4F-2  |  |           |
| Common circulation spaces promote safety and provide for social interaction between residents   |  |           |
| Design Guidance:  |  |           |
| <ul> <li>Incidental spaces can be used to provide seating<br/>opportunities for residents, and promotes<br/>opportunities for social interaction.</li> </ul>  |  |           |
| 4G Storage  |  |           |
| Objective 4G-1  |  |           |
| Adequate, well designed storage is provided in each apartment   | Storage is provided within apartments and in the basement parking levels.                                  | Yes       |
| <ol> <li>In addition to storage in kitchens, bathrooms and<br/>bedrooms, the following storage is provided</li> <li>1 bedroom: 6m<sup>3</sup></li> </ol>  | Sheet A002I details storage for each apartment. All storage complies with minimum dimensions and location. |           |

| Standards/controls   | Comment  | Complies? |
|--|--|-----------|
| 2 bedroom: 8m <sup>3</sup>   |  |           |
| 3+ bedroom: 10m <sup>3</sup>   |  |           |
| At least 50% of the required storage is to be located within the apartment   |  |           |
| Objective 4G-2   |  |           |
| Additional storage is conveniently located, accessible and nominated for individual apartments   |  |           |
| Design Guidance:   |  |           |
| - Storage not located within apartments should be allocated to specific apartments.  |  |           |
| 4H Acoustic privacy  |  |           |
| Objective 4H-1   | Building separation is non-complying.  | No        |
| Noise transfer is minimised through the siting of buildings and building layout  | The principal noise source intruding on apartments is likely to be other   |           |
| Design Guidance  | apartment balconies or communal open space.  |           |
| - Adequate building separation is required (see section 2F above).   | Level 1 and Level 6 communal open<br>space directly adjoins some   |           |
| <ul> <li>Noisy areas within buildings should be located<br/>next to or above each other and quieter areas<br/>next to or above quieter areas.</li> </ul>                             | apartments.<br>Level 1 COS is greater than 3mfrom<br>bedrooms, however Level 6 COS is<br>less than 3m from the bedrooms of<br>apartment 604.                             |           |
| - Storage, circulation areas and non-habitable rooms should be located to buffer noise from external sources.  |  |           |
| <ul> <li>Noise sources such as garage doors, plant<br/>rooms, active communal open spaces and<br/>circulation areas should be located at least 3m<br/>away from bedrooms.</li> </ul> |  |           |
| Objective 4H-2   |  |           |
| Noise impacts are mitigated within apartments through layout and acoustic treatments   |  |           |
| Design Guidance  |  |           |
| - In addition to mindful siting and orientation of the building, acoustic seals and double or triple glazing are effective methods to further reduce noise transmission.             |  |           |
| 4J Noise and pollution   |  |           |
| Objective 4J-1   |  |           |
| In noisy or hostile environments the impacts of<br>external noise and pollution are minimised through<br>the careful siting and layout of buildings                                  | An acoustic report has been provided,<br>which reviewed external noise sources<br>and incorporated noise monitoring. No<br>significant noise sources were<br>identified. | Yes       |
| Design Guidance  |  |           |
| <ul> <li>Minimise impacts through design solutions such<br/>as physical separation from the noise or pollution<br/>source,</li> </ul>  | The acoustic report recommends necessary construction measures to  |           |

| Standards/controls  | Comment  | Complies? |
|---|--|-----------|
| Objective 4J-2  | achieve satisfactory internal noise  |           |
| Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission                     | levels.<br>Submissions from land to the north<br>raise concerns with the potential for<br>future residents to complain about |           |
| Design guidance:  | noise from existing commercial and light industrial activities.  |           |
| - Design solutions include limiting openings to noise sources & providing seals to prevent noise transfer.  |  |           |
| Part 4 – Designing the building - Configuration   |  |           |
| 4K Apartment mix  | The development incorporates 1, 2 and  | Yes       |
| Objective 4K-1  | 3 bedroom apartments.  |           |
| A range of apartment types and sizes is provided to<br>cater for different household types now and into the<br>future   | 11 (10%) apartments are identified as silver level housing.  |           |
| Design guidance   |  |           |
| - A variety of apartment types is provided  |  |           |
| - The apartment mix is appropriate, taking into consideration the location of public transport, market demands, demand for affordable housing, different cultural/social groups |  |           |
| <ul> <li>Flexible apartment configurations are provided to<br/>support diverse household types and stages of<br/>life</li> </ul>  |  |           |
| Objective 4K-2  |  |           |
| The apartment mix is distributed to suitable locations within the building  |  |           |
| Design guidance   |  |           |
| - Larger apartment types are located on the ground<br>or roof level where there is potential for more<br>open space and on corners where more building<br>frontage is available |  |           |
| 4M Facades  |  |           |
| Objective 4M-1  |  |           |
| Building facades provide visual interest along the street while respecting the character of the local area  | A schedule of finishes has been provided which provides a variety of   | Yes       |
| Design guidance   | external materials, and walled landscaping.  |           |
| - To ensure that building elements are integrated into the overall building form and façade design  |  |           |
| - The front building facades should include a composition of varied building elements, textures, materials, detail and colour and a defined base, middle and top of building.   |  |           |
| - Building services should be integrated within the overall facade  |  |           |

| Standards/controls  | Comment   | Complies? |
|---|---|-----------|
| <ul> <li>Building facades should be well resolved with an<br/>appropriate scale and proportion to the<br/>streetscape and human scale.</li> </ul>                     |   |           |
| - To ensure that new developments have facades which define and enhance the public domain and desired street character?   |   |           |
| Objective 4M-2  |   |           |
| Building functions are expressed by the facade  |   |           |
| Design guidance   |   |           |
| - Building entries should be clearly defined  |   |           |
| 4N Roof design  |   |           |
| Objective 4N-1  | The roof of each tower is flat, with no lift                      | Yes       |
| Roof treatments are integrated into the building design and positively respond to other street  | protruding.<br>Photovoltaics are shown on sheet                   |           |
| Design guidance   | A112B.  |           |
| <ul> <li>Roof design should use materials and a pitched<br/>form complementary to the building and adjacent<br/>buildings.</li> </ul>                                 |   |           |
| Objective 4N-2  |   |           |
| Opportunities to use roof space for residential accommodation and open space are maximised  |   |           |
| Design guidance   |   |           |
| <ul> <li>Habitable roof space should be provided with<br/>good levels of amenity.</li> </ul>  |   |           |
| <ul> <li>Open space is provided on roof tops subject to<br/>acceptable visual and acoustic privacy, comfort<br/>levels, safety and security considerations</li> </ul> |   |           |
| Objective 4N-3  |   |           |
| Roof design incorporates sustainability features  |   |           |
| Design guidance   |   |           |
| <ul> <li>Roof design maximises solar access to<br/>apartments during winter and provides shade<br/>during summer</li> </ul>   |   |           |
| 40 Landscape design   |   |           |
| Objective 40-1  | Landscape plans by Site Image have                                | Yes       |
| Landscape design is viable and sustainable  | been provided.  |           |
| Design guidance   | Planting and maintenance details are provided.                    |           |
| - Landscape design should be environmentally sustainable and can enhance environmental performance  | Street tree planting is proposed on both Keira and Kenny Streets. |           |
| - Ongoing maintenance plans should be prepared  |   |           |
| Objective 40-2  |   |           |

| Standards/controls   | Comment  | Complies? |
|--|--|-----------|
| Landscape design contributes to the streetscape and amenity  |  |           |
| Design guidance  |  |           |
| - Landscape design responds to the existing site conditions including:   |  |           |
| • changes of levels  |  |           |
| • views  |  |           |
| <ul> <li>significant landscape features</li> </ul>   |  |           |
| 4P Planting on Structures  |  |           |
| Objective 4P-1   | Green walls are proposed on the  | Yes       |
| Appropriate soil profiles are provided   | northern boundary and would be visible from the public domain.               |           |
| Design guidance  | Planting details are shown on the  |           |
| - Structures are reinforced for additional saturated soil weight   | landscape plan.  |           |
| <ul> <li>Minimum soil standards for plant sizes should be<br/>provided in accordance with Table 5</li> </ul>           |  |           |
| Objective 4P-2   |  |           |
| Plant growth is optimised with appropriate selection and maintenance   |  |           |
| Design guidance  |  |           |
| - Plants are suited to site conditions   |  |           |
| 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<br>planting on structures. Design solutions may<br>include:           |  |           |
| <ul> <li>green walls with specialised lighting for indoor<br/>green walls</li> </ul>                                   |  |           |
| <ul> <li>wall design that incorporates planting</li> </ul>   |  |           |
| <ul> <li>green roofs, particularly where roofs are visible<br/>from the public domain</li> </ul>                       |  |           |
| planter boxes  |  |           |
| 4Q Universal design  |  |           |
| Objective 4Q-1   |  |           |
| Universal design features are included in apartment<br>design to promote flexible housing for all community<br>members | An access report has been provided.<br>11 (10%) of apartments are identified | Yes       |
| Design guidance  | as silver level housing.   |           |
| - A universally designed apartment provides design features such as wider circulation spaces,                          |  |           |

| Standards/controls  | Comment  | Complies? |
|---|--|-----------|
| reinforced bathroom walls and easy to reach and operate fixtures  |  |           |
| Objective 4Q-2  |  |           |
| A variety of apartments with adaptable designs are provided   |  |           |
| Design guidance   |  |           |
| <ul> <li>Adaptable housing should be provided in<br/>accordance with the relevant council policy</li> </ul>                       |  |           |
| Objective 4Q-3  |  |           |
| Apartment layouts are flexible and accommodate a range of lifestyle needs   |  |           |
| Design guidance   |  |           |
| - Apartment design incorporates flexible design solutions   |  |           |
| 4S Mixed use  |  |           |
| Objective 4S-1  |  |           |
| Mixed use developments are provided in appropriate  | The development is shop top housing.   | Yes       |
| locations and provide active street frontages that encourage pedestrian movement  | Separate services, parking, access and facilities are provided for residential and |           |
| Design guidance   | non-residential tenants.   |           |
| <ul> <li>Mixed use development should be concentrated<br/>around public transport and centres</li> </ul>                          |  |           |
| - Mixed use developments positively contribute to the public domain.  |  |           |
| Objective 4S-2  |  |           |
| Residential levels of the building are integrated<br>within the development, and safety and amenity is<br>maximised for residents |  |           |
| Design guidance   |  |           |
| - Residential circulation areas should be clearly defined.  |  |           |
| <ul> <li>Landscaped communal open space should be<br/>provided at podium or roof levels</li> </ul>                                |  |           |
| 4T Awnings and signage  |  |           |
| Objective 4T-1  |  |           |
| Awnings are well located and complement and integrate with the building design  | An awning is proposed on Kenny<br>Street. The application refers to                | Yes       |
| Design guidance   | continuous awnings on both frontages<br>but there does not appear to be an         |           |
| <ul> <li>Awnings should be located along streets with<br/>high pedestrian activity and active frontages</li> </ul>                | awning on Keira Street.<br>No signage is proposed.                                 |           |
| Objective 4T-2  |  |           |
| Signage responds to the context and desired streetscape character   |  |           |

| Standards/controls  | Comment  | Complies? |
|---|--|-----------|
| Design guidance   |  |           |
| <ul> <li>Signage should be integrated into the building<br/>design and respond to the scale, proportion and<br/>detailing of the development</li> </ul> |  |           |
| Part 4 – Designing the building - Configuration   |  |           |
| <u>4U Energy efficiency</u>   | A BASIX certificate and solar access             | Yes       |
| Objective 4U-1  | plans have been submitted.                       |           |
| Development incorporates passive environmental design   | Shading screens are proposed on some apartments. |           |
| Design guidance   | Roof top photovoltaics are shown on sheet A112B. |           |
| <ul> <li>Adequate natural light is provided to habitable<br/>rooms (see 4A Solar and daylight access)</li> </ul>  |  |           |
| Objective 4U-2  |  |           |
| Development incorporates passive solar design to<br>optimise heat storage in winter and reduce heat<br>transfer in summer                               |  |           |
| Design Guidance   |  |           |
| <ul> <li>Provision of consolidated heating and cooling<br/>infrastructure should be located in a centralised<br/>location</li> </ul>                    |  |           |
| <u>Objective 4U-3</u>   |  |           |
| Adequate natural ventilation minimises the need for mechanical ventilation  |  |           |
| 4V Water management and conservation  | A Water Sensitive Urban Design                   | Yes       |
| Objective 4V-1  | strategy has been submitted and is satisfactory. |           |
| Potable water use is minimised  | Salislacioly.                                    |           |
| Objective 4V-2  |  |           |
| Urban stormwater is treated on site before being discharged to receiving waters   |  |           |
| Design guidance   |  |           |
| <ul> <li>Water sensitive urban design systems are<br/>designed by a suitably qualified professional</li> </ul>  |  |           |
| Objective 4V-3  |  |           |
| Flood management systems are integrated into site design  |  |           |
| Design guidance   |  |           |
| - Detention tanks should be located under paved areas, driveways or in basement car parks   |  |           |
| 4W Waste management   |  |           |
| Objective 4W-1  | A waste management plan has been provided.       | Yes       |

| Standards/controls   | Comment  | Complies? |
|--|--|-----------|
| Waste storage facilities are designed to minimise<br>impacts on the streetscape, building entry and<br>amenity of residents                                    | Waste storage and collection would<br>occur at ground level.<br>Separate residential and commercial<br>waste rooms are provided. |           |
| Design guidance  |  |           |
| <ul> <li>Common waste and recycling areas should be<br/>screened from view and well ventilated</li> </ul>  |  |           |
| Objective 4W-2   |  |           |
| Domestic waste is minimised by providing safe and<br>convenient source separation and recycling  |  |           |
| Design guidance  |  |           |
| <ul> <li>Communal waste and recycling rooms are in<br/>convenient and accessible locations related to<br/>each vertical core</li> </ul>                        |  |           |
| <ul> <li>For mixed use developments, residential waste<br/>and recycling storage areas and access should<br/>be separate and secure from other uses</li> </ul> |  |           |
| <ul> <li>Alternative waste disposal, such as composting,<br/>can be incorporated into the design of communal<br/>open space areas</li> </ul>                   |  |           |
| 4X Building maintenance  |  |           |
| Objective 4X-1   | Access to service areas is provided.   | Yes       |
| Building design detail provides protection from weathering   | Proposed materials are robust and low maintenance.   |           |
| Design guidance  |  |           |
| <ul> <li>Design solutions such as roof overhangs to<br/>protect walls and hoods over windows and doors<br/>to protect openings can be used.</li> </ul>         |  |           |
| Objective 4X-2   |  |           |
| Systems and access enable ease of maintenance  |  |           |
| Design guidance  |  |           |
| <ul> <li>Window design enables cleaning from the inside<br/>of the Building</li> </ul>   |  |           |
| Objective 4X-3   |  |           |
| Material selection reduces ongoing maintenance<br>costs easily cleaned surfaces that are graffiti<br>resistant   |  |           |