

Panorama Affordable Rental Housing Architectural Design Statement

Application:

Site Compatibility Certificate

Address:

1 Panorama Avenue, Woollooware NSW

Client:

Pacific Planning on behalf of Pacific Community Housing

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Architectural Design Statement

1. Introduction

The Proposal

This proposal, prepared for Pacific Planning on behalf of Pacific Community Housing, accompanies a new Site Compatibility Certificate, for an affordable shop-top housing development of eight storey with roof terrace that is located approximately 5m from Woollooware Station.

The site is zoned R3 Medium Density Residential under Sutherland Shire LEP 2015 (**SSLEP**) and permits boarding houses, multi-dwelling housing, neighbourhood shops and shop-top housing, but prohibits residential flat buildings. The proposal includes a small commercial tenancy of approximately 60m² fronting Swan Street, adjacent to the station entrance.

At this stage, it is anticipated that the development will comprise 28 x apartments in studio, 1 bedroom, 2 bedroom and 3 bedroom configurations, and a communal room on top of the building, directly adjacent to a communal roof terrace.

SEPP (Housing) 2021 (**SEPP Housing**), Schedule 11, identifies the site and context as being part of the low and mid-rise housing area – Woollooware Station, and is within the area delineated as 'inner core'.

Being located within an R3 – Medium Density Residential zone, the key development standards for the site under SEPP Housing, Part 2, Division 1 (in-fill affordable housing) are:

- Maximum height of building **31.2m** for shop-top housing (24m x 130%)
- Maximum floor space ratio of **2.86:1** (2.2:1 x 130%)

The proposal is entirely consistent with the key development standards of Part 2, Division 1 (in-fill affordable housing).

SEPP Housing, Part 2, Division 5, applies to this development, being less than 800m of a public entrance to the station and for a residential flat building carried out on land by a social housing provider, Pacific Community Housing.

Clause 38 (4) applies the following:

“car parking is not required to be provided in relation to development to which this Division applies other than in relation to the tenanted component of a residential flat building used as built-to-rent housing”

Car parking is proposed for the non-residential use only. In addition, we have proposed parking for motorbikes/ mopeds for the residential apartments.

The proposed non-residential use is a commercial premises as defined by SSLEP within an R3 – Medium Density Residential zone. Shop-top housing is also permitted under SEPP Housing, Chapter 6, Part 4.

Background

Two (2) Site Compatibility Certificates have already been conferred on the site.

The first Site Compatibility Certificate (**SCC #1**), was issued on 8 October 2020 for the following:

Schedule 1

The demolition of the existing building on the site and the construction of a residential flat building, in accordance with the provisions State Environmental Planning Policy (Affordable Rental Housing) 2009 with a maximum height of 9m and floor space ratio of 1.068:1.”

Schedule 2

The final scheme will be subject to the consent authority undertaking a detailed assessment of the proposal as part of the development application process. This will include resolution of a number of issues including but not limited to:

- *Density;*
- *Bulk and scale;*
- *Building setbacks;*
- *Building height;*
- *Compliance with State Environmental Planning Policy No. 65 Design Quality of Residential Apartment Development;*
- *Number of dwellings, based on the above matters;*
- *Building design;*
- *Landscaping;*
- *Traffic and parking;*
- *Heritage*
- *Acoustic treatment;*
- *The amenity of surrounding development; and*
- *Permissibility of the proposed ground-floor non-residential use.*

A Development Application (DA21/0907) was submitted to Council on 31 August 2021 and refused by the Sutherland Shire Local Planning Panel on 18 October 2022. The development application was for a residential flat building comprising 12 x 1 bedroom apartments, and a floor space ratio of 1.01:1 and minor non-compliance of the 9m height limit for the lift overrun.

The reasons for refusal are stated as follows:

"The development is not consistent with the description in Schedule 1 and fails to resolve the matters listed under Schedule 2 of the Site Compatibility Certificate issued by the Department of Planning Industry and Environment on 8 October 2020. The proposal therefore does not satisfy Clause 37(7) of State Environmental Planning Policy (Affordable Rental Housing) 2009 and is unacceptable with regard to the provisions of Section 4.15(1)(a)(i) of the Environmental Planning and Assessment Act, 1979."

The second Site Compatibility Certificate (SCC #2), was issued on 15 June 2023 for the following:

Schedule 1

Residential flat building of approximately 12 apartments of which at least 50% are proposed to be managed by a registered social housing provider as affordable housing for minimum period of 15 years.

Schedule 2

Requirements imposed on determination:

In accordance with clause 39(7) of State Environmental Policy (Housing) 2021, the development is required to satisfy the following requirements:

1. *The final scheme for the development application, including the building setbacks, density and height will be subject to the consent authority undertaking a detailed assessment of the proposal as part of the application process under section 4.15 of the Environmental Planning and Assessment Act 1979;*
2. *The final scheme for the development application complies with SEPP 65 – Design Quality of Residential Apartment Development; and*
3. *The design of the final scheme for the development application is to consider and not detrimentally impact the amenity of existing surrounding development.*

A Section 8.2a Application was reduced by the Sutherland Shire Local Planning Panel on 18 July 2023 and sought to rely upon the SCC #2. However, this certificate was not considered in the assessment of this review application as stated in Section 7.3 of the Sutherland Shire Local Planning Panel – Business Paper dated 18 July 2023 (p.18):

"Council sought legal advice on the validity of [sic] apply a new SCC to a review of determination application. In summary, DA21/0907, the subject of this review application was lodged 31 August 2021. The ARH SEPP 2009 continues to apply to this review application by virtue of the savings provisions in Schedule 7A of the SEPP (Housing) 2021. The new SCC has been issued pursuant to SEPP (Housing) 2021 and therefore cannot be applied to this review application. The original SCC is to be considered in this review application."

The Sutherland Shire Local Planning Panel supported the assessment from Council Officers that “the proposal fails to satisfy the requirements outlined in Schedule 2 of the SCC (SCC #1), most critically, density, bulk and scale, landscaping, traffic and parking and compliance with State Environmental Planning Policy 65 – Design Quality of Residential Apartment Development (SEPP 65).

In February 2025, the NSW Government has sought to increase the supply of residential apartment developments and affordable housing in key locations, particularly around train stations by introducing Schedule 11 – low and mid rise housing area stations, into the SEPP (Housing) 2021.

Consequently, the existing SCC #2 is now outdated, and a new Site Compatibility Certificate is required.

The Planning Secretary must not issue a certificate unless the Planning Secretary:

- a. has taken into account comments, if any, received from the council within 14 days after the application for the certificate was made; and
- b. is of the opinion that the residential flat building is compatible within the surrounding land uses considering the following matters –
 - i. the existing uses and approved uses of land in the area,
 - ii. the impact that the residential flat building, including its bulk and scale, is likely to have on the existing uses, approved uses and uses that, in the opinion of the Planning Secretary, are likely to be the preferred future uses of the land,
 - iii. the services and infrastructure that are or will be available to meet the demands arising from the development, and
 - iv. is of the opinion that the development is not likely to have an adverse effect on the environment and will not cause unacceptable environmental risks to the land.

Importantly, the surrounding context is also zoned R3 – Medium Density Residential under the SSLEP. The future character, as envisaged by SEPP Housing, is for residential apartment or shop-top housing developments with a maximum floor space ratio of 2.86:1 and building heights up to 31.2m.

This architectural design statement outlines the response to the key design issues for the development and must be read in conjunction with the Preliminary Sketch Design prepared by Stanistic Architects.

2. Density

SEPP Housing, Schedule 11, identifies the site and context as being part of the low and mid-rise housing area – Woollooware Station, and is within the area delineated as ‘inner core’.

Being located within an R3 – Medium Density Residential zone, the maximum floor space ratio for the site under SEPP Housing, Part 2, Division 1 (in-fill affordable housing) is 2.86:1 (2.2 x 130%) and is non-discretionary.

The proposal is for a maximum FSR of 2.86:1 which is consistent with Division 1 that applies to the site.

3. Building height

The site has a diagonal cross fall from the south-west corner to the north-east corner of 1.65m.

The site is identified as being flood prone and requires a minimum ground floor of RL 31.17.

Under SEPP Housing, Part 2, Division 1 (in-fill affordable housing), the maximum building height for shop top housing is 31.2m (24m x 130%) and is non-discretionary.

The proposal is for a maximum building height of 29m which is consistent with Division 1 that applies to the site. This includes the lift overrun and any shade structures associated with the roof terrace. The final building height will be determined in a future DA.

4. Bulk and scale

The future context envisaged by SEPP Housing is for residential apartment and shop top housing developments ranging in height from 22m to 31.2m (6 to 9 storeys).

SSDCP, whereas useful, can and has been considered to provide guidance to assist in the consideration of compatibility, it is not the primary planning legislative instrument.

Statutorily, SEPP Housing is the primary legislation and Chapter 4 – Design of residential apartment development requires that the consent authority considers the design principles for residential apartment development set out in Schedule 9, the apartment design guide and any advice received from a design review panel.

To consider whether the bulk and scale of a building is acceptable, consideration is given to how neighbouring sites can redevelop as residential apartments or shop top housing and reach their full development potential and satisfy the design principles for residential apartment development in Schedule 9.

Bulk

The bulk of the building, defined by its setbacks, building height and deep soil zone is compatible with its context as:

- The site has a key corner location adjacent to the entrance to Woollooware Station.
- A commercial premises is proposed to Swan Street, the primary street, that is setback 3m at Level 1 (Ground) with a nil setback above as recommended in the ADG, Part 2G. It is expected that future developments along the western side of Swan Street will also be shop top housing to define Swan Street as a primary street that connects Woollooware across the railway line and strengthen the urban structure.
- The existing setback on the southern corner of Swan Street and Panorama Avenue is 3m. The setback consistent with SSDCP, Chapter 5 which is for a minimum 3m setback to a secondary street frontage.
- Along Panorama Avenue, the proposal has a 3m setback increasing to 5.1m to align with the adjoining dwelling. The reduced 3m setback mirrors the setback on the southern corner. The increased street setback at 5.1m transitions to existing and future developments along Panorama Avenue where the SSDCP guidance for residential apartment buildings in R4 zone is a street setback between 6m and 7.5m.
- The street setbacks along Panorama Avenue define the key corner location while transitioning to future residential apartment developments along Panorama Avenue.
- The maximum building height is 31.2m and is consistent with SEPP Housing, Division 1.
- The deep soil zone is 24% of the site area and is consistent with SEPP Housing, Division 1 and is non-discretionary.

Scale

The scale of the building, comparing the proposed development to one or more existing or future developments within its setting, defined by its height, articulation and detail is compatible with its context as:

- The proposed building is approximately 29m in height that is envisaged to be adjacent to other residential apartment developments between 22m to 31.2m in height. This is below the height permitted under SEPP Housing, Part 2, Division 1 of 31.2m.
- The key corner location is strengthened by a nil setback to Swan Street and 3m to 5.1m setback along Panorama Avenue and no setbacks at higher levels. The stepped setback transitions to existing and future developments along Panorama Avenue. It is envisaged that other sites along Panorama Avenue will be setback between 6 to 7.5m, with an additional 3m setback above 22m.
- The Apartment Design Guide, Part 2F – Building Separation, recommends the minimum separation distances for buildings up to 4 storeys. The proposal has a 6m side setback and anticipates a 6m setback to a future building to the west boundary. Side walls are articulated by setting back the to achieve depth and modelling and direct outlook from apartments to the street and away from neighbouring dwellings and achieving visual privacy between buildings.
- Sun eye view diagrams and shadow diagrams have been prepared at the winter solstice and illustrate the existing context. These diagrams confirm that all affected existing dwelling will continue to receive 2 hours of solar access at mid-winter.
- Indicative future forms have been developed for the surrounding context to test whether the proposal will restrict development on these sites, primarily by overshadowing. Sun eye view diagrams and shadow diagrams have been prepared at the winter solstice and illustrate the future context. These diagrams confirm that future residential apartment buildings are capable of achieving 2 hours of solar access and the proposal does not restrict development on affected sites in any way.

- While the character of the proposed massing is different to the character of a dwelling, its scale is compatible with its setting as SEPP Housing envisages future developments to a similar scale and the proposal has no adverse impacts on surrounding developments. This results in a proposal that is a compatible scale and is not alien to its future setting.
- The massing form comprises a stepped form to the along Panorama Avenue, circulation to the south, and modulated and articulated form to the northern boundary and a roof terrace.
- It is anticipated that the building will be composed of face brick in a colour prevalent with the existing developments along Panorama Avenue.
- Apartments have excellent outlook to the north and east and circulation to the shady south. The roof terrace will provide excellent amenity to the development away from the noise of the railway.
- The articulation and potential detail can achieve a built form that has a fine grain and is complementary to the surrounding dwellings, multi-dwelling housing, as well as existing and future residential apartment developments.

5. Residential amenity

The Apartment Design Guide, Parts 3 + 4, contain objectives, design criteria and design guidance for the siting, design and amenity of apartment development.

The residential amenity can satisfy the objectives of the ADG guideline as detailed below:

- The proposal provides excellent amenity to all residents with a northern orientation with 28 x affordable rental apartments in studio, 1 bedroom and 2 bedroom configurations. The plan has been organised with livings to the north (sun), east or west and open gallery access to the south (shade). The lift and stair core is contained within the overall form of the building.
- All living rooms achieve the minimum width of 3.6m for studio and 1 bedroom apartments, and 4.0m for 2 bedroom apartments. All apartments have a private open space accessed directly from the living area and achieve the minimum area guidelines of the ADG. Private open spaces achieve an external area of 5m² for studio, 8-13m² for 1 bedroom and 15m² for 2 bedroom apartments which satisfy the guidelines of the ADG. There are no apartments at ground level.
- Visual and acoustic privacy is achieved through orientation, internal layouts and acoustic treatment internally and between communal open spaces.
- 100 (28/28) apartments achieve more than 2 hours of direct sunlight to living rooms and private open spaces at mid-winter which meets the guidelines of the ADG.
- 75% (21/28) of apartments are naturally cross ventilated utilising corner ventilation or through ventilation. A recess has been inserted into the northern elevation with a ratio of 2:1 to create corner ventilation. The ADG guidelines recommend 17/28 apartments are naturally cross ventilated.
- The residential entry lobby is access from the corner on Swan Street. It has level access and is clearly visible from the street. The entry lobby is partially recessed into the ground with planting at eye height due to the topography. This creates a wonderful, landscaped interface. The galleries animate the southern elevation and increase surveillance to Panorama Avenue.
- The side elevation to the west has been skilfully designed where outlook from the bedroom is directed towards the rear boundary rather than the side which avoids overlooking the existing dwelling or future apartment developments. The proposed development meets the visual privacy guidelines of the ADG, Part 3E, maintaining visual privacy to existing and future developments.
- All apartments can achieve the minimum storage guideline of the ADG, with 100% of storage within the apartment as no basement is proposed.
- 20% (6/28) apartments will be designed to achieve 'silver level' Liveable Housing Guideline's universal design features, exceeding the minimum SSDCP2015 requirement for 10% of dwellings and ADG requirement for 20% of dwellings.
- 20% (6/28) apartments will be adaptable apartments and achieve compliance with AS 4299, in accordance with the SSDCP2015 requirement.

The development provides excellent amenity to all residents and does not restrict development on the neighbouring site in any way.

6. Landscape

Under SEPP Housing, Part 2, Division 1 (in-fill affordable housing), the minimum deep soil zone is 15% of the site area and is non-discretionary. Deep soil zone means “a landscaped area with no buildings or structures above or below the ground.” The proposed deep soil zone is 24% of the site area (with minimum dimensions of 3m), to be confirmed by a future landscape design, which exceeds the minimum 15% development standard under SEPP Housing, Division 1 that applies to the site.

Under SEPP Housing, Part 2, Division 1 (in-fill affordable housing), the minimum landscaped area is 30% of the site area and is non-discretionary. Landscaped area means “*part of the site area not occupied by a building and includes a part used or intended to be used for a rainwater tank, swimming pool or open-air recreation facility, but does not include a part used or intended to be used for a driveway or parking area.*” The proposed landscaped area (communal open space) is 32% of the site area to be confirmed by a future landscape design – it also excludes minor structures.

However, we understand that there have been recent changes to planning policies that collectively guide design from projects within the low and mid rise housing areas and ensure that the development satisfies the current State Planning Instruments.

The applicable standards under the Housing SEPP 2021 are: the Tree Canopy Guide (2025), and the Apartment Design Guide. Where the Sutherland LEP or DCP conflicts with the Housing SEPP, the Housing SEPP prevails in accordance with Clause. While our current design achieves 32% of the site area as deep soil area, this after could be reduced significantly, in accordance with the recent guidelines from the DPHIE.

Under the Tree Canopy Guide (2025), and with a site area of 674m², the minimum deep soil area is 10%, the minimum tree canopy is 15% and two medium trees are required to be provided – this can be easily achieved on the site:

Guidance notes

- For residential flat buildings and shop-top housing, the deep soil and tree planting in Table 6 or Table 7 should be applied across the whole development.
- Deep soil in Table 6 aligns with the design criteria under Objective 3E-1 of the Apartment Design Guide.
- Deep soil in Table 7 aligns with the design guidance under Objective 3E-1 of the Apartment Design Guide.
- For the purposes of this guide, assumed tree sizes are summarised in Table 2. Assumed tree sizes at maturity.
- A development can deliver either the tree canopy percentage target or the tree planting rate to satisfy the guidance objectives.
- Existing canopy can contribute to achieving the targets. This guide should not be used to justify tree removal or a reduction in canopy cover.

**Table 6. Tree canopy and deep soil
(residential flat buildings and shop-top housing)**

Site area	Tree canopy (min % site area)	Deep soil (min % site area)
All lots	15%	7%

Table 7. Tree canopy and deep soil (residential flat buildings and shop-top housing –enhanced)

Site area	Tree canopy (min % site area)	Deep soil (min % site area)	Tree planting rate
<650 m ²	15%	7%	For every 350 m ² of site area or part thereof, plant at least one small tree in the deep soil area.
650-1,500 m ²	15%	10%	For every 350 m ² of site area or part thereof, plant at least one medium tree in the deep soil area.
>1,500 m ²	20%	15%	For every 575 m ² of site area, or part thereof, plant at least 2 medium trees or one large tree in the deep soil area.

In addition to this, the definition of deep soil in the guideline has been clarified and can include area below minor structures, whereas, the Sutherland LEP, excludes minor structures.

Term	Definition
Contiguous soil zones	Deep soil zones that are connected within and between property boundaries
Deep soil	<p>A landscaped area connected horizontally to the soil system and local ground water system beyond and is unimpeded by any building or structure above or below ground with the exception of minor structures*.</p> <p>Deep soil zones with a minimum dimension of 3m allows sufficient space for the planting and healthy growth of new trees that provide canopy cover and assist with urban cooling and infiltration of rainwater to the water table. Deep soil also allows for the retention of existing trees.</p> <p>* Minor structures are defined as:</p> <ol style="list-style-type: none"> path, access ramp or area of paving with a maximum width up to 1.2m essential services infrastructure (such as stormwater pipes) with a maximum diameter up to 300mm landscape structures (such as lightweight fences, light poles or seating) requiring a footing with a maximum size of up to 300mm x 300mm in cross section. <p>The 3 m dimension in deep soil refers to 3 m in every horizontal direction (length and width). This means deep soil is a minimum 9 m² (3 m x 3 m).</p>
Tree	A long-lived woody perennial plant greater than (or usually greater than) 3 m in height with one or relatively few main stems or trunks (or as defined by the determining authority)
Tree canopy	The layer of leaves, branches and stems of a tree that provide coverage of the ground when viewed from above, or the combined canopy area of a group of trees
Tree planting rate	The minimum number of trees to be provided in deep soil zones

If we consider the Apartment Design Guide, design criteria recommend a deep soil zone of 7% on sites with a site area between 650 – 1,500m². On sites where there are non-residential uses at ground level, it recommends that this design criteria might be unable to be achieved and could be reduced further.

The current design significantly exceeds the landscape requirement.

An key objective of the R3 zone – Medium Density Residential in the SSLEP is “to promote a high standard of residential amenity in a high quality landscaped setting that is compatible with natural features” and is broadly measured by providing a 30% deep soil development standard. The SSLEP conflicts with the Housing SEPP in relation to this objective and promotes a future character of shop top housing and residential apartment developments in an urban setting.

7. Non-residential uses

The proposed non-residential use is a commercial premises as defined by SSLEP within an R3 – Medium Density Residential zone. Shop-top housing is also a permitted use with consent under SEPP Housing, Chapter 6, Part 4. It is preferred that a small food and drink premises would be a compatible use in this key location at the entrance to the railway station, although it is currently prohibited in SSLEP - R3 zone despite shop top housing being a permissible use.

SSLEP defines shop top housing as being “one or more dwellings located above the ground floor of a building, where at least the ground floor is used for **commercial premises** or health services facilities.

The proposed commercial premise will be a use that will create a community hub for residents of the affordable housing development to connect with the existing and future local community. It will strengthen the urban structure by creating a primary street between the local shops on Willis Road and Swan Street – connecting the north and southern areas of Woollooware across the railway line.

Shop top housing would be appropriate and should be encouraged along the western side of Swan Street to the Kingsway. It will also support the future increased residential population within the inner and outer core areas of Woollooware Station to the south of the railway line.

8. Traffic + parking

Under SEPP Housing Part 2, Division 5, residential parking is not required and is non-discretionary. The site is well located, within 5m of the entrance to Woollooware Station. Bicycle parking for the residential apartments will be provided. A minimum of 28 bicycle parking spaces (1 per unit) is provided adjacent to the communal courtyard on ground level. Three (3) at-grade visitor motorcycle parking spaces has also been provided on the ground level that are accessed from Panorama Avenue.

Car parking is proposed for the non-residential use only. Car parking will be applied in accordance with the RTA Guide to Traffic Generating Developments.

A driveway is proposed along the western boundary in the same location as the existing driveway for the dwelling house. No on street parking will be affected by providing non-residential parking on the site.

9. Waste collection

Waste collection can be from the kerb along Panorama Avenue or Swan Street. The proposal can accommodate waste collection for either scenario.

In their assessment of the Development Application (DA21/0907), Business Paper of Sutherland Shire Local Planning Panel (18 July 2023), Reference No. PLN033-20 – 1 Panorama Avenue, Woollooware, Appendix A (page 115) that Council's engineers assessed the proposal and concluded that kerbside collection from Swan Street is acceptable at this location, stating:

"Kerbside collection from Swan Street is acceptable at this location."

A primary objection to the development from the local community was the potential loss of street parking. If waste is collected from Panorama Avenue, it will require street parking spaces to be managed so that it can be collected. Typically, this requires street parking to be restricted on collection days which means that parking will be reduced. It also requires that vehicles are compliant with traffic management signage to ensure that a waste management plan can be implemented.

10. Consultation with Council

The Applicant (including Stanistic Architects) met with Sutherland Shire Council (Steward Rodham, Sue McMahon, Beth Morris) on 14 May 2025. Stanistic Architects presented the sketch design that accompanies this Architectural Design Statement. At this meeting, Council made some useful comments that can be accommodated in future Development Application – the key comments are summarised below:

1. **Reduce the hardstand area along the western boundary** by narrowing the driveway to a single lane and introducing tree planting. The inclusion of trees is considered important for preserving the area's existing character.

Response: Driveway narrowed to 3m width and trees included along the side boundary.

2. **Refine the Panorama Avenue elevation** to create a more human-scaled streetscape. The addition of small step-out balcony to the eastern apartment to reduce the length of the gallery was suggested to enhance this quality.

Response: Step out balconies added to all levels at corner of Panorama Avenue and Swan Street.

3. **Aim for a high-quality landscape design** like the Heathcote Affordable Housing Project, incorporating well-designed ground-level landscaping and shaded roof areas.

Response: Landscape Architect will be engaged to prepare ground level landscaping like Heathcote.

4. **Clarify the nature of the balconies facing the railway line** and how acoustic privacy will be achieved whilst still allowing residents to receive fresh air from this elevation.

Response: Fixed glass louvres added to balustrades and acoustic panels fixed to balcony soffits.

5. **Consider increasing floor-to-floor heights to 3.2 metres**, where feasible, given the proposal is significantly below the maximum height allowed under SEPP (Housing) 2021. It was noted that this needs to be considered in conjunction with the deemed-to-satisfy provisions of the Building Code of Australia (BCA) to avoid the requirement for a second stair and other fire services infrastructure to be provided.

Response: Floor-to-floor heights maintained at 3.1 metres to avoid second fire egress stair and other fire services; ceilings achieve 2.7 metres.

6. **Provide additional details for non-residential uses** as food and drink premises as currently not permissible in an R3 zone.

Response: Food and drink premises preferred - this is a planning matter which will be addressed at DA stage.

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