



CREDWELL

Project 810 Pacific Highway, Gordon NSW 2072

Report ESD Report

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Client Ecove Group

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Contents

Document Control	2
1 Executive Summary	4
1.1 Introduction	4
1.2 Background	6
1.3 Planning Context	6
1.4 The Site	7
1.5 Scope of ESD Statement	7
2 Compliance with relevant Legislation and Policy	10
2.1 Section 193 of the EP&A Regulation	11
2.2 Ku-ring-gai Local Environmental Plan (LEP) 2015	12
2.3 Ku-ring-gai Development Control Plan (DCP) 2016 and SEPP 2021	13
2.4 The State Environmental Planning Policy (Sustainable Buildings) 2022	14
2.5 NCC 2022 Volume One Section J Provisions & SEPP (Sustainable Buildings) 2022 ..	16
2.6 Minimising Emissions and Reducing Resource Consumption towards Net Zero	17
3 Conclusion	17
4 Appendix	18

1 Executive Summary

1.1 Introduction

This Ecologically Sustainable Development (ESD) report has been prepared by Credwell Consulting to accompany a detailed State Significant Development Application (SSDA) (SSD-101444458) for a mix-use residential and commercial development at 810 Pacific Highway, Gordon NSW 2072.

The site is described as Lot 12 DP631351 and has a total area of 2,357m² and is located within the Gordon town centre, immediately north of the Gordon Centre and south of the Ku-ring-gai Council Chambers. The proposal delivers approximately 180 new dwellings (including affordable housing apartments), together with a full-line supermarket in a highly accessible location, contributing to both State and Council housing objectives while revitalising Gordon Town Centre.

The proposal is declared State Significant Development (SSD) pursuant to Schedule 1, section 26A of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). SSD-101444458 seeks approval for an amending DA which proposes to amend DA-0610-17, except for the demolition, excavation, shoring and piling works, which are to proceed under the existing approval.

This report concludes that the proposed development is suitable and warrants approval subject to the implementation of the following mitigation measures to reduce greenhouse gas emissions, enhance energy and water efficiency, promote responsible material sourcing, and lessen the impact on the natural environment:

1. Energy Efficiency:

1. Electrified cooking appliances and hot water systems and energy-efficient sanitary appliances.
2. Integration of renewable energy sources such as solar panels with potential battery storage systems.
3. Efficient appliance, hot water systems, service and lighting.
4. Installation of smart meters to track energy and water consumption in real-time.
5. Enhancing insulation and optimising heating and cooling systems.

2. Water Conservation and Stormwater Management:

6. 15kL rainwater tank for reuse, with water-efficient showerheads, taps, and toilets.
7. Stormwater treatment system featuring OceanProtect's Ocean Guards and stormfilter cartridges, designed to meet pollutant reduction targets set by Ku-ring-gai Council.
8. Incorporating green spaces and water-saving features, while ensuring accessibility and community integration.

3. Sustainable Materials and Waste Management:

9. Exploring the use of sustainable materials and finishes with low embodied emissions, such as responsibly sourced steel, timber, and concrete with sustainability certifications, Environmental Product Declarations and locally sourced options.
10. Selecting materials made from reused or recycled content.
11. Reuse and recycling of materials.
12. Using paints, adhesives, sealants, and carpets with low levels of Total Volatile Organic Compounds (TVOC).
13. Ensuring all engineered wood products have low levels of Total Volatile Organic Compounds (TVOC).
14. Waste separation in designated areas with bins for proper waste management, to be designed and approved by a waste specialist or contractor.

4. Passive Design and Climate Adaptation:

15. High insulation in walls, exposed ceilings, suspended floors, and energy-efficient double-glazed windows.
16. Awning windows to promote natural ventilation.
17. Proper sealing of doors, windows, and other openings to prevent drafts and air leaks.
18. Open layout design for the kitchen, living, and dining areas to enhance natural light and connectivity.
19. Assess and mitigate climate-related risks by implementing a pre-screening checklist.

5. Green Spaces and Biodiversity:

20. Minimum 33.6m² of deep soil areas for extensive landscaping.
21. Planting of endemic and native landscaping to support local biodiversity.
22. Preservation of trees with "high retention value" to maintain environmental integrity.

6. Sustainable Transport:

23. Encouragement of alternative transportation methods, such as walking, cycling, public transit, and carpooling.
24. Provision of 303 bicycle parking spaces for residents and 36 for visitors.

7. Environmental Compliance:

25. Development of a site-specific Environmental Management Plan covering the scope of construction activities through to completion.
26. Exclusion of harmful refrigerants like chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) in heating, ventilation, air conditioning, refrigeration, and cold/freezer rooms.
27. Compliance with BASIX sustainability requirements throughout the development.

Following the implementation of the above mitigation measures, the remaining impacts are appropriate.

1.2 Background

Development consent (DA-0610/17) was issued on 12 December 2018 by the Sydney North Planning Panel for the demolition of existing buildings and the construction of a mixed-use development on the subject site. The approved scheme provided for:

- 56 apartments in a shop-top housing format, comprising a mix of one, two and three-bedroom dwellings.
- An Aldi supermarket and a small retail tenancy at ground floor level, supported by storage, loading and back-of-house facilities at the lower ground level.
- Three basement levels containing 142 car parking spaces for residents, visitors, and retail customers.
- Associated landscaping, signage, earthworks and tree removal, including the relocation of a Canary Island Date Palm.

The consent was issued as a Deferred Commencement Approval, subject to the satisfaction of several preconditions. The consent was subsequently modified on three occasions:

- MOD0222/20 (21 September 2021)
- MOD0194/21 (18 November 2021)
- MOD0061/25 (13 November 2025)

These modifications collectively removed the deferred commencement condition, amended the development description, and incorporated an amended construction traffic management plan into the approved documentation. MOD0061/25 approved the increased depth of excavation, realigned basement walls in the northeast corner and modified conditions relating to the issue of construction certificates to allow preliminary basement excavation to occur independently. This SSDA will amend the existing Development Consent and associated modifications. Notwithstanding, preliminary works are proposed to proceed under the current consent to meet Aldi's contractual requirement to be established and operating on the site by 2028.

1.3 Planning Context

The planning context for the site has evolved significantly since the original consent was issued. In April 2024, the Department of Planning, Housing and Infrastructure (DPHI) identified the site as being located within a Transport Oriented Development (TOD) precinct. In parallel, Ku-ring-gai Council progressed a preferred planning framework for Gordon Town Centre, including proposed amendments to the Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015). Following a Council-initiated legal process, legislative amendments removed access to TOD uplift for proposals that had not been submitted in June 2025. As part of the resolution of this legal process, Council formally endorsed its preferred planning framework for Gordon Town Centre on 5 June 2025. That framework was subsequently accepted by the Department, with minor amendments, and implemented through an amendment to the KLEP 2015 via the State Environmental Planning Policy Amendment (Ku-ring-gai Station Precincts) 2025, which commenced on 14 November 2025.

The proposed development responds to the amended KLEP 2015 and, in addition, seeks to utilise the floor space ratio and height incentives available under Chapter 2, Part 2, Division 1 of the State Environmental Planning Policy (Housing) 2021.

1.4 The Site

The site is located at 810 Pacific Highway, Gordon NSW 2072 within the Ku-ring-gai Local Government Area. The site has a site area of 2,357m² and is legally described as:

- Lot 12 DP631351



Figure 1 Site Aerial

Source: Good Maps, 2025

1.5 Scope of ESD Statement

Credwell has been engaged to assess the proposed ESD initiatives at 810 Pacific Highway, Gordon, and their relevance to both the current sustainability landscape and future developments.

This will involve reviewing the planned operations and providing recommendations.

The Planning Secretary's Environmental Assessment Requirements (SEARs) applicable to this development is outlined below:

Item	SEARs Description	Report Section
15. Ecologically Sustainable Development (ESD)	Identify how ESD principles (as defined in Section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development.	Section 2.1
	Where relevant, provide an assessment of the development against the standards for non-residential development set out in Chapter 3.2.(1) of State Environmental Planning Policy (Sustainable Buildings) 2022.	Section 2.4

Additionally, compliance has also been demonstrated for relevant legislation and policies:

Item	ESD Description	Report Section
Other Legislation and Policy	Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards.	Section 2.2 Section 2.4
	Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.	Section 2.5

The proposed development is subject to the Ku-ring-gai Local Environmental Plan (LEP) 2015, with the criteria outlined in the table below.

Aims of Plan	
aa.	Not applicable.
a.	To guide the future development of land and the management of environmental, social, economic, heritage and cultural resources within Ku-ring-gai
b.	To protect, enhance and sustainably manage the biodiversity, natural ecosystems, scenic values, water resources and ecological processes within the catchments of Ku-ring-gai for the benefit of current and future generations.
c.	Not applicable.
d.	to facilitate adaptation to climate change.
e.	Not applicable.
f.	Not applicable.
g.	to ensure that development does not conflict with the hierarchy of commercial centres in Ku-ring-gai
h.	Not applicable
i.	Not applicable
j.	Not applicable.
k.	Not applicable
l.	Not applicable.
m.	Not applicable
n.	to facilitate development of the commercial centres to enhance Ku-ring-gai's economic role and cater to the retail and commercial needs of the local community
o.	Not applicable.

The State Environmental Planning Policy (Sustainable Buildings) 2022 is also applicable to the proposed development.

Aims of Policy	
a	To encourage the design and delivery of sustainable buildings.
b	To ensure consistent assessment of the sustainability of buildings.
c	To record accurate data about the sustainability of buildings, to enable improvements to be monitored.
d	To monitor the embodied emissions of materials used in construction of buildings.
e	To minimise the consumption of energy.
f	To reduce greenhouse gas emissions.
g	To minimise the consumption of mains-supplied potable water.
h	To ensure good thermal performance of buildings.

2 Compliance with relevant Legislation and Policy

Sustainable buildings and districts encompass various categories that combine the design and operation of a development into a cohesive strategy, addressing environmental, social, and economic goals. The ESD initiatives outlined in this statement are in accordance with applicable legislation and policies.

The Environmental Planning and Assessment Regulation 2021, Division 5, Environmental Impact Statements—the Act, ss 4.12(8), 5.7(1), and 5.16(2), Section 193 defines Ecologically Sustainable Development (ESD) as follows:

- a. Precautionary Principle:
 - If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.
 - In the application of the precautionary principle, public and private decisions should be guided by:
 - careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and
 - an assessment of the risk-weighted consequences of various options.
- b. Inter-generational equity:
 - The present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.
- c. Conservation of biological diversity and ecological integrity:
 - Conservation of biological diversity and ecological integrity should be a fundamental consideration.
- d. Improved valuation, pricing and incentive mechanisms:

Environmental factors should be included in the valuation of assets and services, such as:

- polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,
- the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,
- environmental goals, having been established, should be pursued in the most cost-effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problem.

The principles of The Environmental Planning and Assessment Regulation 2021, Division 5, Environmental Impact Statements—the Act, ss 4.12(8), 5.7(1), and 5.16(2), Section 193 are outlined below along with the fulfilling mitigation measures within the scope of the project.

2.1 Section 193 of the EP&A Regulation

The following outlines each principle, along with the relevant mitigation measures and their alignment with specific reports.

Principles	Mitigation Measures	Document Reference
a. Precautionary Principle	To mitigate the threat of water pollution and efficient use of bore water, by utilising existing bore hole infrastructure.	Integrated Water Management Plan, 2025 Civil Drawing Set, 2025
b. Inter-generational equity	The development is strategically placed within walking distance of the Gordon Train Station, ensuring an easily accessible commute to workers and students for generations to come. By allocating a portion of the development to affordable housing, it will allow people of all generations to live in the Ku-ring-gai area. The excavation works conducted at the site, as concluded by Van de Meer, will not pose a significant impact on the adjacent RMS infrastructure. This will ensure that previous generations infrastructure will not be disrupted.	Transport Impact Assessment, 2025 Shoring Design Report, 2025
c. Conservation of biological diversity and ecological integrity	To aid the greater pressures of adapting to an energy efficient module, the development will be introducing electrified cooking appliances, as well as water and energy efficient sanitary appliances. As part of the Remediation Action Plan, the development will employ a remedial approach which will involve the excavation of impacted materials, followed by waste classification and off-site disposal according to NSW EPA (2014). Prior to the commencement of any development or excavation works on site the trunk/s and branches of the listed trees are to be protected by the placement of 50 x 100mm timbers over suitable protective padding material.	BASIX Report, 2025 Remediation Action Plan, 2025 Woodside Consulting, 2025
d. Improved valuation, pricing and incentive mechanisms	To reinforce pollution reduction, the project has considered waste management and accessibility to waste disposal operations.	Data Gap Investigation, 2025

	Portions of the development have been allocated towards affordable housing, ensuring equitable living and improved valuation for the Ku-ring-gai area. Additionally, building management /owner's corporation and cleaners would be responsible in ensuring the following to prevent or minimise the dispersion of litter throughout the site: 1. Prevent overfilling of bins by ensuring bin lids are closed at all times. 2. Require waste contractor to remove any spillage that may occur during waste collections; and 3. Ensure anyone found responsible for inappropriate waste disposal or dumping would be appropriately educated and made aware of correct waste disposal techniques.	Operational Waste Management Plan, 2025
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2.2 Ku-ring-gai Local Environmental Plan (LEP) 2015

The following table illustrates how each initiative can be achieved through the implementation of mitigation measures. The findings and recommendations from the relevant consultant reports have been incorporated into this assessment.

LEP initiatives	Mitigation Measures
aa. Not Applicable	-
a. to guide the future development of land and the management of environmental, social, economic, heritage and cultural resources within Ku-ring-gai	To guide the future development of land, the development will become a precedent for the method of excavation, as the builder should submit a work method statement for excavation and retention of the basement.
b. To protect, enhance and sustainably manage the biodiversity, natural ecosystems, scenic values, water resources and ecological processes within the catchments of Ku-ring-gai for the benefit of current and future generations	To ensure the groundwater quality is improved and unimpacted at the site, the development will adhere to JK Geotechnics groundwater level, water quality and dewatering rate monitoring program. JK Geotechnics have also assessed that the potential impact of the development on the immediate groundwater regimes will occur wholly within the bedrock and consequently there is no risk of damage to adjoining structures as a result of induced settlements.
c. Not applicable	-

d. To facilitate adaptation to climate change	To adapt to climate change, the development proposes the inclusion of electrified kitchen appliances, as well as water, and energy efficient appliances. In doing so, it will be meeting the BASIX Water, Energy, and Thermal Load limits. A comprehensive Integrated Water Management Plan, along with Civil systems, will facilitate the sensitive use of water on site.
e. Not applicable	-
f. Not applicable	-
g. to ensure that development does not conflict with the hierarchy of commercial centres in Ku-ring-gai	By placing an accessible retail zone on the ground floor, the mixed-use development will contribute to the hierarchy of commercial centres in Ku-ring-gai
h. Not applicable	-
i. Not applicable	-
j. Not applicable	-
k. Not applicable	-
l. Not applicable	-
m. Not applicable	-
n. to facilitate development of the commercial centres to enhance Ku-ring-gai's economic role and cater to the retail and commercial needs of the local community	Same as above
o. Not applicable	-

2.3 Ku-ring-gai Development Control Plan (DCP) 2016 and SEPP 2021

As per the SEPP (Planning Systems) 2021;

2.10 Application of development control plans to State significant development

(1) Development control plans (whether made before or after the commencement of this Chapter) do not apply to—

(a) State significant development

Henceforth, the Ku-ring-gai DCP is not included within this ESD Report.

2.4 The State Environmental Planning Policy (Sustainable Buildings) 2022

The following table outlines how each initiative can be accomplished using mitigation measures for SEPP Chapter 3.2.(1).

SEPP initiatives	Mitigation Measures
a. To encourage the design and delivery of sustainable buildings.	The builder/ head contractor to develop a site-specific Environmental Management Plan that covers the scope of construction activities through to completion. The building shall provide bins for the separation of waste streams in designated waste storage areas. The design of these areas shall be approved by a waste specialist or contractor. As a future opportunity, the paints, adhesives, sealants, and carpets used internally should have low levels of Total Volatile Organic Compounds (TVOC). All engineered wood products shall have low levels of Total Volatile Organic Compounds (TVOC). The development incorporates solar panels on the rooftop, in accordance with the specifications outlined in the BASIX certificate. The development shall consider the inclusion of all-electric appliances and hot water systems, as specified in the BASIX certificate. Any heating, ventilation, air conditioning, refrigeration systems, and cold/freezer rooms will exclude the use of refrigerants like chlorofluorocarbons (CFCs) or hydrochlorofluorocarbons (HCFCs) with high ozone depletion potential. The development features a minimum 15kL rainwater tank for reuse, along with water-efficient showerheads, taps, and toilets as outlined in the BASIX certificate. Options will be explored to use materials with low embodied carbon emissions, including products made from recycled or reused content, sustainably sourced timber and steel, items with Environmental Product Declarations (EPDs), low-carbon concrete alternatives like fly ash or slag cement, and locally sourced materials to minimize transportation emissions. The development features a stormwater treatment system comprising a 15kL rainwater tank for reuse, 2x Atlan Filters, and OSD tank to attenuate peak flow. These systems are used to manage stormwater runoff. They are designed to meet the pollutant reduction targets established by Ku-ring-gai Council.

	This includes an: - 85% reduction in the mean annual load of Total Suspended Solids (TSS) - 65% reduction in the mean annual load of Total Phosphorus (TP) - 45% reduction in the mean annual load of Total Nitrogen (TN) - 70% reduction in the mean annual load of gross pollutant
b. To ensure consistent assessment of the sustainability of buildings.	As per the above.
c. To record accurate data about the sustainability of buildings, to enable improvements to be monitored.	Installing smart meters to track energy and water consumption in real-time.
d. To monitor the embodied emissions of materials used in construction of buildings.	Filling out the NABERS embodied emissions material form for the non-residential components and completing the Materials section in BASIX for the residential sections.
e. To minimise the consumption of energy.	Using energy-efficient appliances and LED lighting as prescribed in the BASIX certificate. Enhancing insulation and optimise heating and cooling systems. An open layout design for the kitchen, living, and dining areas, combined with glazed balcony doors, creates a light-filled environment, enhancing natural light and connectivity. Solar panels will be installed on the rooftop, meeting the minimum peak kW capacity specified in the BASIX certificate.
f. To reduce greenhouse gas emissions.	Using energy-efficient appliances, services and lighting as prescribed in the BASIX certificate. Solar panels will be installed on the rooftop, meeting the minimum peak kW capacity specified in the BASIX certificate. The development encourages alternative modes of transportation, including walking, cycling, public transit, and carpooling, with 303 bicycle parking spaces for residents and 36 for visitors. Reuse and recycling of materials. Selecting materials made from reused or recycled content.
g. To minimise the consumption of mains-supplied potable water.	The development features a minimum 15kL rainwater tank for reuse, along with water-efficient showerheads, taps, and toilets as outlined in the BASIX certificate.

	The development includes the planting of endemic and native landscaping, and the protection of trees with 'high retention value'.
h. To ensure good thermal performance of buildings.	The design features high insulation in walls, exposed ceilings, and suspended floors, along with energy-efficient double-glazed windows, as outlined in the BASIX requirements. Awning windows are provided to promote natural ventilation. Ensuring proper sealing of doors, windows, and other openings to prevent drafts and air leaks.

2.5 NCC 2022 Volume One Section J Provisions & SEPP (Sustainable Buildings) 2022

To expand on the SEPP (SB) 2022, this section will expand on the project's fulfilment of 3.2(1)(a-f) and identifying the items used to meet and exceed, where possible, the standards of performance within Section J. NCC22 as detailed below.

SEPP SB 2022, 3.2(1)(a-f)	Means of achievement
a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials	An Operational Waste Management Plan (OWMP) will be put in place as a mechanism to monitor and ensure waste is evaluated into the appropriate streams and also as a result of ongoing operations from the development. Programs should be robust to ensure no crossover of waste types into landfill and recyclable waste.
b) a reduction in peak demand for electricity, including through the use of energy efficient technology	Refer to BASIX Certificate for energy features
c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design	Refer to <i>Table 1 - Building Fabric Requirements J1V3 commercial areas</i> Refer to BASIX for passive design thermal specification and Certificate for energy features
d) the generation and storage of renewable energy	Section J9D5 detailed in section J report, accommodates for the future installation of solar photovoltaic panels and storage solutions. In addition, project must have an energy meter configured to record the time-of-use consumption of gas (there is no gas to site as per BSE assessment) and electricity.
e) the metering and monitoring of energy consumption	Same as above.
f) the minimisation of the consumption of potable water	The reduction in water use will be established through high WELS rated water fixtures and fittings, and provision of rainwater capture and reuse system.

	Project will ensure a minimum water rating of 4 star, for water features that include taps, toilets, showers and any white-goods. Refer to BASIX Certificate for water features.
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2.6 Minimising Emissions and Reducing Resource Consumption towards Net Zero

The primary goal of various environmental regulations and policies is to create a sustainable building designed to endure for years.

Key actions to minimise greenhouse gas emissions and support the Government's goal of net zero emissions by 2050 include:

- Transitioning to renewable energy and building electrification to reduce emissions across multiple sectors.
- Improving energy efficiency in buildings by upgrading insulation and glazing, utilising energy-efficient appliances, building services, efficient lighting and control systems.
- Promoting the adoption of electric vehicles (EVs), facilitating EV charging stations and designing walkable paths and cyclist routes, and options for car sharing.
- Utilising materials with low embodied carbon emissions and focusing on reusing and recycling resources.

By implementing the strategies outlined in this report, it is possible to reduce emissions and build a more sustainable future.

3 Conclusion

This report outlines how the objectives specified in the SEARs 2025, Ku-ring-gai's Local Environmental Plan (LEP), along with Section 193 of the Environmental Planning and Assessment (EP&A) Regulation and the State Environmental Planning Policy (SEPP), are addressed in relation to the proposed development at 810 Pacific Highway, Gordon NSW 2072. The report provides a comprehensive analysis of how the development complies with the relevant planning and regulatory requirements, ensuring alignment with the goals and guidelines set by these frameworks.

Sections of the SEARs, LEP, EP&A Regulation, or SEPP that are not applicable to this type of development are not covered in this report.

4 Appendix

Table 1 - Building Fabric Requirements J1V3 commercial areas

Part	Element	Reference Building (Model 1)	Proposed Building with Reference Services (Model 2)
J4. Building Fabric	Roof Solar Absorptance (SA)	Must not be greater than 0.45	
	Roof (Concrete Roof, etc)	Total R-Value of 3.70	Total R-Value of 2.00
	External Wall Solar Absorptance	0.60	
	External Wall <i>North/South/West</i> walls	Total R-Value of R1.40	Total R-Value of R1.40
	External Wall <i>East</i> walls	Total R-Value of R1.00	
	Internal Wall <i>North/South/West</i> walls	Total R-Value of R1.40	
	External Wall <i>East</i> walls	Total R-Value of R1.00	
	Solar Admittance of Externally Facing Wall- Glazing Construction	Must not be greater than 0.13	
	Shading	As per drawings	
	Slab-on-Ground Floor	No additional thermal insulation required	
	Suspended Floor to unconditioned/external areas below	Total R-Value of 2.0, with additional thermal rigid board insulation of R1.80	No additional thermal insulation required.
	External Glazing Total system U-value (frame & glass) & SHGC	U-Value: 6.80 SHGC: 0.70 (Possible: Single, Clear, Al Frame)	U-Value: 6.80 SHGC: 0.66 (Possible: Single, Low-e Clear, Al Frame) <i>To all external glazing to identified conditioned envelope</i>
	Internal Glazing Total system U-value (frame & glass) & SHGC	U-Value: 4.30 SHGC: 0.81	U-Value: 4.80 SHGC: 0.81 (Possible: Single, Low-e Clear, Al Frame) <i>To Aldi airlock entry internal glazing</i>

Form latest Section J & issued J1V3 report