

Appendix C - Statutory Compliance Table

Statutory Requirement	Relevance and Assessment	Compliance
NSW Acts of Parliament		
<i>Environmental Planning and Assessment Act 1979</i>		
<i>Part 1 – Preliminary</i>		
<i>Section 1.3 – Objects of the Act</i>		
<i>a. to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i>	The Proposal will increase the social welfare of the community through the provision of affordable housing, introduction of communal open space, residential housing and the generation of jobs while ensuring social impacts are adequately managed. Refer to Section 6.14 and Social Impact Assessment (Appendix BB).	✓
<i>b. to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	The Proposal will facilitate the ecological sustainable development (ESD) of the Site through the reintroduction of endemic species and a range of sustainability targets. As outlined in Section 6.11 and ESD Report (Appendix W), the Proposal is consistent with Section 193 of the <i>Environmental Planning and Assessment Regulation 2021</i> (EP&A Regulation) which establishes the principles of ESD.	✓
<i>c. to promote the orderly and economic use and development of land,</i>	The Proposal constitutes the orderly and economic development of the Site by delivering high-quality mixed-use development including affordable housing in Strathfield on land recognised to provide high-density mixed use development. Further, it will facilitate communal open space, private open space and commercial component to further promote the orderly and economic use of land.	✓
<i>d. to promote the delivery and maintenance of affordable housing,</i>	The Proposal will deliver an affordable housing contribution of 15.35%, including a mix of accommodation to provide opportunities for a range of residents. Refer to Section 3.0 and the Architectural Drawings (Appendix B).	✓

e. <i>to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</i>	The Proposal incorporates landscaping and greening infrastructure throughout the development to promote environmentally sustainable outcomes.	✓
f. <i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i>	The Site does not contain any local or State heritage items and will not have an unacceptable impact on surrounding heritage items. The assessment of archaeological heritage impacts determined that the Site has low potential to contain any objects or sites due to the extensive disturbance that will have destroyed any potential surface sites or subsurface deposits. For further discussion, refer to Section 6.17 and 6.18 as well as the Aboriginal Cultural Heritage Assessment Report (ACHAR) (Appendix DD). Further, consultation was undertaken with Aboriginal groups during the preparation of the ACHAR in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> . A summary of the Aboriginal consultation process and outcomes is provided in the ACHAR.	✓
g. <i>to promote good design and amenity of the built environment,</i>	The proposed mixed-use development has been designed in a high-quality manner to provide good amenity to the surrounding environment. For further discussion, refer to Section 6.1 .	✓
h. <i>to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i>	The Proposal will comply with all relevant construction codes and Australia standards, and will promote the health and safety of occupants.	✓
i. <i>to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i>	Not applicable.	N/A
j. <i>to provide increased opportunity for community participation in environmental planning and assessment.</i>	The Applicant has consulted with the community during the preparation of the EIS which will be publicly exhibited in accordance with the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act).	✓

Part 4 – Development assessment and consent

Section 4.15 – Evaluation

1. Matters for consideration—general In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application—	This EIS has assessed the Proposal in accordance with the relevant NSW Environmental Planning Instruments (EPIs). The assessment demonstrates it is in accordance with the relevant provisions and consistent with the relevant objectives of the applicable EPIs.	✓
a. <i>the provisions of—</i>		
i. <i>any environmental planning instrument, and</i>		
ii. <i>any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning</i>	Not applicable.	N/A

<i>Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and</i>		
<i>iii. any development control plan, and</i>	Section 2.10 of <i>State Environmental Planning Policy (Plannings Systems) 2021</i> (Planning Systems SEPP) outlines that development control plans do not apply to State Significant Development (SSD). As such, the site-specific development control plan (<i>DCP 26 – 2-6 Pilgrim Avenue and 9-13 Albert Road, Strathfield</i>) (or any other DCP) does not apply.	N/A
<i>(iiia.) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and</i>	The Proposal is not accompanied by a proposed planning agreement.	N/A
<i>iv. the regulations (to the extent that they prescribe matters for the purposes of this paragraph), that apply to the land to which the development application relates,</i>	The EIS has been prepared in accordance with the relevant provisions of the EP&A Regulation as outlined in the EIS.	✓
<i>b. the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality</i>	The potential impacts of the Proposal have been assessed within the EIS and supporting technical appendices. The assessment has had regard to the environmental impacts on both the natural and built environments and social and economic impacts in the locality. Refer to Section 6.0 and the proposed mitigation measures (Appendix E) to manage environmental impacts.	✓
<i>c. the suitability of the site for the development,</i>	<p>Having regard to the characteristics of the Site and its immediate surrounding context, the Proposal is suitable for the Site for the following reasons:</p> <ul style="list-style-type: none"> • It is located within the MUI Mixed Use zone, and strongly aligns with the objectives of the zone pursuant to the Strathfield LEP 2012 as it exemplifies a true mixed-use development that integrates both commercial and residential land uses, activating the ground plane; • In its current form, the Site is underutilised and does not represent the highest and best use with the potential to create a landmark development at the western gateway to the Strathfield Town Centre; • It is generally compliant with the statutory controls under the Strathfield LEP 2012 and the Environmental Planning Instruments; • It is close proximity to a range of high-frequency public transport options, including the Strathfield Station, approximately 200m to the east of the Site; • It responds to the surrounding context by positioning building mass accordingly and strong façade articulation; • It will not result in any adverse environmental impacts and any impact can be appropriately managed and mitigated; and • It is not affected by significant constraints on the Site such as bushfire hazards, endangered species and contamination or hazardous materials. 	✓

d. any submissions made in accordance with this Act or the regulations	Any submissions received will be considered by the applicant following the exhibition of the EIS.	✓
e. the public interest	<p>Having regard to the public interest, the Proposal is considered to be in the public interest for the following reasons:</p> <ul style="list-style-type: none"> • It contributes to the supply of affordable housing in the Strathfield LGA, directly responding to the NSW Government's policy to deliver affordable housing for very low to moderate income households; • It create new housing supply within Strathfield Town Centre, supported by close proximity to Strathfield Station and services within the town centre; • It revitalises a currently underutilised strategic site to provide increase amenity to the public domain and activation of the Strathfield Town Centre; and • It supports convenience for the future and existing residents of the locality through provision of two (2) commercial tenancies, whilst also stimulating the ground plane to create a vibrant and active public domain. 	✓

Section 4.41 – Approvals etc legislation that does not apply

<p>1) The following authorisations are not required for State significant development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply)—</p> <p>(a) (Repealed)</p> <p>(b) a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,</p> <p>(c) an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977,</p> <p>(d) an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,</p> <p>(e) (Repealed)</p> <p>(f) a bush fire safety authority under section 100B of the Rural Fires Act 1997,</p> <p>(g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.</p>	The Proposal would not require any of the subject legislative approvals if the proposed development was not State Significant Development (SSD).	✓
--	--	---

Section 4.42 – Approvals etc legislation that must be applied consistently

<p>(1) An authorisation of the following kind cannot be refused if it is necessary for carrying out State significant development that is authorised by a development consent under this Division and is to be substantially consistent with the consent—</p> <p>(a) an aquaculture permit under section 144 of the Fisheries Management Act 1994,</p> <p>(b) an approval under the Coal Mine Subsidence Compensation Act 2017, section 22,</p>	The Proposal will require approval for the proposed roadworks under Section 138 of the Roads Act 1993 from Strathfield Council.	✓
---	---	---

- (c) a mining lease under the Mining Act 1992,
- (d) a production lease under the Petroleum (Onshore) Act 1991,
- (e) an environment protection licence under Chapter 3 of the Protection of the Environment Operations Act 1997 (for any of the purposes referred to in section 43 of that Act),
- (f) a consent under section 138 of the Roads Act 1993,
- (g) a licence under the Pipelines Act 1967.

Biodiversity and Conservation Act 2016

Part 7 – Biodiversity assessment and approvals under Planning Act

Section 7.9 – Biodiversity Assessment for State Significant Development

1. This section applies to—
 - a. an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development,
2. Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.
3. The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.

A Biodiversity Development Assessment Report (BDAR) Waiver (**Appendix Z**) was granted for SSD-80432461 by the Department of Climate Change, Energy, the Environment, and Water (DCCEE) – Conservation Programs, Heritage, and Regulation (CPHR) Group on 7 March 2025. Therefore, preparation of a BDAR is not required.



Statutory Instruments

Environmental Planning and Assessment Regulation 2021

Part 3 – Development Applications

Section 35B – Additional requirements for development applications involving contravention of development standards

- (1) This section applies to a development application that proposes, in accordance with a relevant EPI provision, development that contravenes a development standard imposed by any environmental planning instrument.
- (2) The development application must be accompanied by a document that sets out the grounds on which the applicant seeks to demonstrate that—
 - (a) compliance with the development standard is unreasonable or unnecessary in the circumstances, and
 - (b) there are sufficient environmental planning grounds to justify the contravention of the development standard.

The Clause 4.6 Variation Request (**Appendix J**) supporting the proposed variation to the floor space ratio (FSR) development standard demonstrates the following in accordance with Clause 4.6 of the Strathfield LEP 2012:

- Compliance with the development standard is unreasonable or unnecessary in the circumstances; and
- There are sufficient environmental planning grounds to justify the contravention of the development standard.



Part 8 – Infrastructure and Environment Impact Assessment

Section 190 – Form of Environmental impact statement

<p>(1) An environmental impact statement must contain the following information—</p> <p>(a) the name, address and professional qualifications of the person who prepared the statement,</p> <p>(b) the name and address of the responsible person,</p> <p>(c) the address of the land—</p> <p>(i) to which the development application relates, or</p> <p>(ii) on which the activity or infrastructure to which the statement relates will be carried out,</p>	<p>The subject information is provided within the Signed Declaration.</p>	<p>✓</p>
<p>(d) a description of the development, activity or infrastructure,</p>	<p>The subject information is provided within Section 3.0.</p>	<p>✓</p>
<p>(e) an assessment by the person who prepared the statement of the environmental impact of the development, activity or infrastructure, dealing with the matters referred to in this Division.</p>	<p>The subject information is provided within Section 6.0.</p>	<p>✓</p>
<p>(2) The person preparing the statement must have regard to—</p> <p>(a) for State significant development—the State Significant Development Guidelines, or</p> <p>(b) for State significant infrastructure—the State Significant Infrastructure Guidelines.</p>	<p>The EIS has been prepared in accordance with DPHI's <i>State Significant Development Guidelines – Preparing an Environmental Impact Statement</i>.</p>	<p>✓</p>
<p>(3) An environmental impact statement must also contain a declaration by a relevant person that—</p> <p>(a) the statement has been prepared in accordance with this Regulation, and</p> <p>(b) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure, and</p> <p>(c) the information contained in the statement is not false or misleading, and</p> <p>(d) for State significant development or State significant infrastructure—the statement contains the information required under the Registered Environmental Assessment Practitioner Guidelines</p>	<p>The EIS contains a declaration that it has been reviewed by a Registered Environmental Assessment Planner (REAP).</p>	<p>✓</p>
<p>Section 191 – Compliance with environmental assessment requirements</p>		
<p>The environmental impact statement must comply with the environmental assessment requirements notified under section 176 or the Act, section 5.16(4)</p>	<p>The EIS has been prepared to address all matters within the issued SEARs. Confirmation of compliance is provided within the SEARs Compliance Table (Appendix A).</p>	<p>✓</p>
<p>Section 192 – Content of environmental impact statement</p>		
<p>(1) An environmental impact statement must contain the following—</p> <p>(a) a summary of the environmental impact statement,</p>	<p>The subject information is provided within the Summary.</p>	<p>✓</p>
<p>(b) a statement of the objectives of the development, activity or infrastructure.</p>	<p>The subject information is provided within Section 1.3.</p>	<p>✓</p>
<p>(c) an analysis of feasible alternatives to the carrying out of the development, activity or infrastructure, considering its objectives, including the consequences of not carrying out the development, activity or infrastructure,</p>	<p>The subject information is provided within Section 2.5.</p>	<p>✓</p>
<p>(d) an analysis of the development, activity or infrastructure, including—</p>	<p>The subject information is provided within Section 3.0, 4.0, 5.0, and Appendix E.</p>	<p>✓</p>

<ul style="list-style-type: none"> (i) a full description of the development, activity or infrastructure, and (ii) a general description of the environment likely to be affected by the development, activity or infrastructure and a detailed description of the aspects of the environment that are likely to be significantly affected, and (iii) the likely impact on the environment of the development, activity or infrastructure, and (iv) a full description of the measures to mitigate adverse effects of the development, activity or infrastructure on the environment, and <p>(v) a list of the approvals that must be obtained under another Act or law before the development, activity or infrastructure may lawfully be carried out,</p>		
<p>(e) a compilation, in a single section of the environmental impact statement, of the measures referred to in paragraph (d)(iv),</p>	<p>The subject information is provided within Appendix E.</p>	<p>✓</p>
<p>(f) the reasons justifying the carrying out of the development, activity or infrastructure, considering biophysical, economic and social factors, including the principles of ecologically sustainable development set out in section 193.</p>	<p>The subject information is provided within Section 7.0.</p>	<p>✓</p>
<p>Section 193 – Principles of ecologically sustainable development</p>		
<p>(1) The principles of ecologically sustainable development are the following—</p> <ul style="list-style-type: none"> (a) the precautionary principle, (b) inter-generational equity, (c) conservation of biological diversity and ecological integrity, (d) improved valuation, pricing and incentive mechanisms. 	<p>The Proposal is consistent with the principles of ESD, which have been addressed within Section 6.11 and ESD Report (Appendix W).</p>	<p>✓</p>
<p>NSW Environmental Planning Instruments</p>		
<p>State Environmental Planning Policy (Planning Systems) 2021</p>		
<p>Chapter 2 – State and Regional Development</p>		
<p>Section 2.6 – Declaration of State Significant Development</p>		
<p>1. Development is declared to be State significant development for the purposes of the Act if—</p> <ul style="list-style-type: none"> a. the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and b. the development is specified in Schedule 1 or 2. 	<p>The Proposal is for the purposes of residential development including in-fill affordable housing within the Greater Sydney Region with an Estimated Development Cost (EDC) of more than \$75 million. Therefore, in accordance with Schedule 1, Section 26A of the Planning Systems SEPP, it is declared to be SSD for the purposes of the EP&A Act.</p>	<p>✓</p>
<p>2) If a single proposed development the subject of one development application comprises development that is only partly State significant development declared under subsection (1), the remainder of the development is also declared to be State significant development, except for—</p> <ul style="list-style-type: none"> (a) so much of the remainder of the development as the Director-General determines is not sufficiently related to the State significant development, and 	<p>In accordance with Section 2.6(2) of the Planning Systems SEPP, all parts of a Development Application are also declared SSD for the purposes of EP&A Act.</p>	<p>✓</p>

- (b) coal seam gas development on or under land within a coal seam gas exclusion zone or land within a buffer zone (within the meaning of clause 9A of State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007), and
- (c) development specified in Schedule 1 to State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007.

Section 2.10 – Application of development control plans to State significant development

- | | | |
|--|---|----------|
| <p>1) Development control plans (whether made before or after the commencement of this Chapter) do not apply to—</p> <ul style="list-style-type: none"> a) State significant development, or b) development for which a relevant council is the consent authority under section 4.37 of the Act. | <p>The site-specific development control plan applicable to the Site (DCP 26 – 2-6 Pilgrim Avenue and 9-13 Albert Road, Strathfield) or any other DCP does not apply to the State Significant Development Application (SSDA).</p> | <p>✓</p> |
|--|---|----------|

State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 2 – Infrastructure

Section 2.98 – Development adjacent to rail corridors

- | | | |
|---|---|----------|
| <p>(1) This section applies to development on land that is in or adjacent to a rail corridor, if the development—</p> <ul style="list-style-type: none"> (a) is likely to have an adverse effect on rail safety, or (b) involves the placing of a metal finish on a structure and the rail corridor concerned is used by electric trains, or (c) involves the use of a crane in air space above any rail corridor, or (d) is located within 5 metres of an exposed overhead electricity power line that is used for the purpose of railways or rail infrastructure facilities. <p>(2) Before determining a development application for development to which this section applies, the consent authority must—</p> <ul style="list-style-type: none"> (a) within 7 days after the application is made, give written notice of the application to the rail authority for the rail corridor, and (b) take into consideration— <ul style="list-style-type: none"> (i) any response to the notice that is received within 21 days after the notice is given, and (ii) any guidelines that are issued by the Planning Secretary for the purposes of this section and published in the Gazette. | <p>The Proposal is located adjacent to a rail corridor and Section 2.98 of State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP) is applicable. Prior to determination, the consent authority must refer the SSDA to the relevant rail authority and take into consideration feedback received.</p> <p>The Proposal is supported by an Electrolysis & Stray Traction Current Report (Appendix FF) which identifies the following result of the investigation:</p> <ul style="list-style-type: none"> • Stray traction current can be expected to be present on the Site. • Corrosion of the water and fire services or the electrical earth can be caused by stray traction current. Installation of an insulating fitting in the water and fire services, or the use of a non-metallic water meter or PVC pipe eliminates this hazard. • Simple and inexpensive measures only are required to eliminate any corrosion hazard from stray traction currents. | <p>✓</p> |
|---|---|----------|

Section 2.99 – Excavation in, above, below or adjacent to rail corridors

- | | | |
|--|--|----------|
| <p>(1) This section applies to development (other than development to which section 2.101 applies) that involves the penetration of ground to a depth of at least 2m below ground level (existing) on land—</p> <ul style="list-style-type: none"> (a) within, below or above a rail corridor, or (b) within 25m (measured horizontally) of a rail corridor, or (c) within 25m (measured horizontally) of the ground directly below a rail corridor, or | <p>The Proposal includes excavation within 25m of a rail corridor and Section 2.99 of the Transport and Infrastructure SEPP is applicable. Prior to determination, the consent authority must refer the SSDA to the relevant rail authority and take into consideration feedback received.</p> | <p>✓</p> |
|--|--|----------|

- (d) within 25m (measured horizontally) of the ground directly above an underground rail corridor.
- (2) Before determining a development application for development to which this section applies, the consent authority must—
 - (a) within 7 days after the application is made, give written notice of the application to the rail authority for the rail corridor, and
 - (b) take into consideration—
 - (i) any response to the notice that is received within 21 days after the notice is given, and
 - (ii) any guidelines issued by the Planning Secretary for the purposes of this section and published in the Gazette.
- (4) In deciding whether to provide concurrence, the rail authority must take into account—
 - (a) the potential effects of the development (whether alone or cumulatively with other development or proposed development) on—
 - (i) the safety or structural integrity of existing or proposed rail infrastructure facilities in the rail corridor, and
 - (ii) the safe and effective operation of existing or proposed rail infrastructure facilities in the rail corridor, and
 - (b) what measures are proposed, or could reasonably be taken, to avoid or minimise those potential effects.

Section 2.100 – Impact of rail noise or vibration on non-rail development

- (1) This section applies to development for any of the following purposes that is on land in or adjacent to a rail corridor and that the consent authority considers is likely to be adversely affected by rail noise or vibration—
 - (a) residential accommodation,
 - (b) a place of public worship,
 - (c) a hospital,
 - (d) an educational establishment or centre-based child care facility.
- (2) Before determining a development application for development to which this section applies, the consent authority must take into consideration any guidelines that are issued by the Planning Secretary for the purposes of this section and published in the Gazette.
- (3) If the development is for the purposes of residential accommodation, the consent authority must not grant consent to the development unless it is satisfied that appropriate measures will be taken to ensure that the following LAeq levels are not exceeded—
 - (a) in any bedroom in the residential accommodation—35 dB(A) at any time between 10.00 pm and 7.00 am,
 - (b) anywhere else in the residential accommodation (other than a garage, kitchen, bathroom or hallway)—40 dB(A) at any time.

The Proposal includes development for the purposes of residential accommodation and Section 2.100 of the Transport and Infrastructure SEPP is applicable. Prior to determination, the consent authority must take into consideration any relevant guidelines that are issued by the Planning Secretary.

The Proposal will not result unacceptable noise impacts for future residents, as outlined in the Acoustic Report (**Appendix Q**).



Section 2.122 – Traffic-generating development

- (1) This section applies to development specified in Column 1 of the Table to Schedule 3 that involves—
- a) new premises of the relevant size or capacity, or
 - b) an enlargement or extension of existing premises, being an alteration or addition of the relevant size or capacity.
- (4) Before determining a development application for development to which this section applies, the consent authority must—
- (a) give written notice of the application to TfNSW within 7 days after the application is made, and
 - (b) take into consideration—
 - (i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and
 - (ii) the accessibility of the site concerned, including—
 - (A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and
 - (B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and
 - (iii) any potential traffic safety, road congestion or parking implications of the development.

The Proposal is considered ‘traffic generating activity’ as it includes development for the purposes of residential accommodation with more than 75 dwellings with access to a classified road or a road that connects to a classified road. Prior to determination, the consent authority must refer the SSDA to the relevant rail authority and take into consideration feedback received.

✓

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 – Remediation of Land

Section 4.6 – Contamination and Remediation to be considered in determining development application

1. A consent authority must not consent to the carrying out of any development on land unless—
 - a. it has considered whether the land is contaminated, and
 - b. if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and
 - c. if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.
2. Before determining an application for consent to carry out development that would involve a change of use on any of the land specified in subsection (4), the consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned carried out in accordance with the contaminated land planning guidelines.
3. The applicant for development consent must carry out the investigation required by subsection (2) and must provide a report on it to the consent authority. The consent authority may require

Section 4.6 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) stipulates that a consent authority must not consent to the carrying out of development unless:

- It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out.
- If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose.

An Additional Site Investigation Plan prepared by EI Australia (**Appendix U**) confirms that the Site can be made suitable for the proposed development and use. For further discussion on contamination and remediation, refer to **Section 6.9**.

✓

the applicant to carry out, and provide a report on, a detailed investigation (as referred to in the contaminated land planning guidelines) if it considers that the findings of the preliminary investigation warrant such an investigation.

State Environmental Planning Policy (Housing) 2021

Chapter 2 – Affordable Housing

Section 15C – Development to which this division applies

- (1) This division applies to development that includes residential development if—
- (a) the development is permitted with consent under Chapter 3, Part 4, Chapter 5, Chapter 6 or another environmental planning instrument, and
 - (b) the affordable housing component is at least 10%, and
 - (c) all or part of the development is carried out—
 - (i) for development on land in the Six Cities Region, other than in the City of Shoalhaven or Port Stephens local government area—in an accessible area, or
 - (ii) for development on other land—within 800m walking distance of land in a relevant zone or an equivalent land use zone.

Section 15C of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) applies to the Proposal as it:

- Is permissible with consent under the Strathfield LEP 2012;
- At least 10% (15.35%) of the proposed dwellings are designated as affordable housing; and
- Is located in located in an accessible area.

✓

Section 16 – Affordable housing requirements for additional floor space ratio

- (1) The maximum floor space ratio for development that includes residential development to which this division applies is the maximum permissible floor space ratio for the land plus an additional floor space ratio of up to 30%, based on the minimum affordable housing component calculated in accordance with subsection (2).

The Proposal includes the delivery of 288 dwellings, with 35 proposed to be affordable housing dwellings. This equates to a total affordable housing contribution of 15.35%. Therefore, the Proposal may utilise an additional floor space ratio of 30% above the FSR of 5:1 under the Strathfield LEP 2012 (6.5:1).

✓

- (2) The minimum affordable housing component, which must be at least 10%, is calculated as follows—

$$\text{affordable housing component} = \frac{\text{additional floor space ratio}}{\text{(as a percentage)}} + 2$$

The Proposal includes a total floor space ratio of 6.8:1, greater than the permitted 30% bonus (6.5:1). The proposed exceedance is due to the designation of wintergarden GFA on the northern elevation of Building P, equating to an FSR of 0.3:1. It is noted that the Proposal complies with the permitted 30% bonus FSR excluding wintergarden GFA, including a total FSR of 6.49:1. Refer to DA0401 of the Architectural Drawings (**Appendix B**).

✓

The Proposal is supported by a Clause 4.6 Variation Request (**Appendix J**) that justifies the proposed variation to the maximum FSR development standard under Clause 4.4 of the Strathfield LEP 2012 and Section 16(1) of the Housing SEPP.

- (3) If the development includes residential flat buildings or shop top housing, the maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the land plus an additional building height that is the same percentage as the additional floor space ratio permitted under subsection (1).

The Proposal represents development for the purposes of shop top housing. It is therefore eligible for an additional 30% above the maximum building height under the Strathfield LEP 2012.

✓

Section 19 – Non-discretionary development standards – the Act, s4.15

1) The object of this section is to identify development standards for particular matters relating to residential development under this division that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.	Noted.	✓
2) The following are non-discretionary development standards in relation to the residential development to which this division applies—	See below.	✓
a) a minimum site area of 450m ² ,	The Site includes a total Site area of 3,361.90m ² with a total developable area of 2,868.80m ² .	✓
b) minimum landscaped area that is the lesser of— i) 35m ² per dwelling, or ii) 30% of the site area,	Due to the highly urban context, the Proposal cannot feasibly provide 30% of the developable area (1,008.30m ²) as landscape area. Therefore contributing the visual and environmental amenity of the Site, including the creation of a total tree canopy coverage of 15.5% within the developable area, and 25.82% within the Site area. Refer to the Landscape Drawings (Appendix I).	✗
(c) a deep soil zone on at least 15% of the site area, where— (i) each deep soil zone has minimum dimensions of 3m, and (ii) if practicable, at least 65% of the deep soil zone is located at the rear of the site,	The Proposal does not include deep soil zones on at least 15% of the Site given its highly urban context. It seeks to create high quality landscape areas for future residents, workers and the public, also utilise land along the Pilgrim Avenue street reserve owned by the Applicant to create a significantly improved outcome.	✗
(d) living rooms and private open spaces in at least 70% of the dwellings receive at least 3 hours of direct solar access between 9am and 3pm at mid-winter,	The Proposal complies with the ADG as 72.4% of dwellings received a minimum of 2hrs solar access in mid-winter. Refer to the Architectural Drawings (Appendix B).	✗
e) the following number of parking spaces for dwellings used for affordable housing— (i) for each dwelling containing 1 bedroom—at least 0.4 parking spaces, (ii) for each dwelling containing 2 bedrooms—at least 0.5 parking spaces, (iii) for each dwelling containing at least 3 bedrooms—at least 1 parking space,	The Proposal utilises the non-discretionary parking rates to calculate the required amount parking spaces based on the dwelling mix for the affordable housing component. It includes 17 parking spaces located in the basement carpark and is therefore compliant with the relevant parking requirement (noting one of the spaces is provided as a visitor space as required by the CHP).	✓
(f) the following number of parking spaces for dwellings not used for affordable housing— (i) for each dwelling containing 1 bedroom—at least 0.5 parking spaces, (ii) for each dwelling containing 2 bedrooms—at least 1 parking space, (iii) for each dwelling containing at least 3 bedrooms—at least 1.5 parking spaces,	The Proposal utilises the non-discretionary parking rates to calculate a required amount of 176.5 car parking spaces based on the dwelling mix for market dwellings. Accordingly, the proposed development includes 237 car parking spaces located across all levels of the carpark.	✓
(g) the minimum internal area, if any, specified in the Apartment Design Guide for the type of residential development,	The Proposal meets the minimum internal areas stipulated in the Apartment Design Guide (ADG). Refer to the assessment provided in this table.	✓

Section 20 – Design requirements

<p>(3) Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the residential development is compatible with—</p> <p>(a) the desirable elements of the character of the local area, or</p> <p>(b) for precincts undergoing transition—the desired future character of the precinct.</p>	<p>The affordable housing component will be managed by a registered community housing provider (CHP) for at least 15 years commencing on the day an occupation certificate is issued for the development.</p>	<p>✓</p>
<p>Chapter 4 – Design of residential apartment development</p>		
<p>Section 148 – Non-discretionary development standards for residential apartment development – the Act, s4.15</p>		
<p>(2) The following are non-discretionary development standards—</p>	<p>See below.</p>	<p>✓</p>
<p>(a) the car parking for the building must be equal to, or greater than, the recommended minimum amount of car parking specified in Part 3J of the Apartment Design Guide,</p>	<p>The amount of carparking proposed is equal to, or greater than the minimum amount of carparking specific in Part 3J of the Apartment Design Guide.</p>	<p>✓</p>
<p>(b) the internal area for each apartment must be equal to, or greater than, the recommended minimum internal area for the apartment type specified in Part 4D of the Apartment Design Guide,</p>	<p>The internal area for each apartment is equal to, or greater than, the recommended minimum internal area for the apartment type specified in Part 4D of the Apartment Design Guide.</p>	<p>✓</p>
<p>(c) the ceiling heights for the building must be equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide.</p>	<p>The ceiling heights for each apartment is equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide.</p>	<p>✓</p>
<p>State Environmental Planning Policy (Sustainable Buildings) 2022</p>		
<p>Chapter 2 – Standards for residential development—BASIX</p>		
<p>Section 2.1 – Standards for BASIX development and BASIX optional development</p>		
<p>(1) Schedule 1 sets out the standards that apply to BASIX development referred to in paragraphs (a) and (b) of the definition of BASIX development in the Environmental Planning and Assessment Regulation 2021.</p> <p>(5) Development consent must not be granted to development to which the standards specified in Schedule 1 or 2 apply unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</p>	<p>The Proposal aligns with the definition of a BASIX building as it involves the erection of a building that contains at least one (1) dwelling. The provisions of Schedule 1 – Standards for erection of BASIX buildings have been considered and implemented in the design of the proposed development. Refer to the NatHERS & BASIX Certification (Appendix X).</p>	<p>✓</p>
<p>Strathfield Local Environmental Plan 2012</p>		
<p>Clause 2.3 - Zone Objectives and Land Use Table</p>		
<p>(1) The Land Use Table at the end of this Part specifies for each zone—</p> <p>(a) the objectives for development, and</p> <p>(b) development that may be carried out without development consent, and</p> <p>(c) development that may be carried out only with development consent, and</p> <p>(d) development that is prohibited.</p>	<p>The Site is zoned MU1 Mixed Use where the Proposal is identified as permissible with consent. It is also consistent with the objectives of the MU1 zone in that:</p> <ul style="list-style-type: none"> It assists in delivery housing supply to meet the housing demands of the community within a high-density residential environment; 	<p>✓</p>

- (2) The consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.
- (3) In the Land Use Table at the end of this Part—
- (a) a reference to a type of building or other thing is a reference to development for the purposes of that type of building or other thing, and
- (b) a reference to a type of building or other thing does not include (despite any definition in this Plan) a reference to a type of building or other thing referred to separately in the Land Use Table in relation to the same zone.
- (4) This clause is subject to the other provisions of this Plan.

- It provides a variety of housing types and sizes along with the delivery of affordable housing;
- It improves the amenity of the surrounding area, as it:
 - Provides a high level of landscaping within the Site and deep soil zone along the street edge;
 - Provides a contextually appropriate interface to the surrounding heritage items through a considered podium design and articulation and sympathetic materiality;
 - Provides amenities for the day-to-day needs of the residents including a dedicated communal facilities space;
 - Will not result in any unacceptable overshadowing, view loss or visual impacts; and
 - Will have an acceptable traffic and parking impact on the surrounding road network. development.
- It provides two (2) commercial tenancies at the ground plane to support activation and services for the local community;
- It will ensure that a high level of residential amenity is achieved and maintained by providing compliant solar access, natural ventilation, landscaping and communal open space within the development, and maintaining solar access to surrounding developments.

Clause 4.3 – Height of Buildings

The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.

The Site is identified as comprising a maximum HOB of 54m on the Height of Buildings Map under the Strathfield LEP 2012.

The Proposal includes a building height of 69m and therefore proposes to vary the HOB development standard. However, the Proposal delivers a 15.35% affordable housing contribution through the provision of 35 affordable housing dwellings within the total of 228 dwellings. In accordance with Chapter 2, Part 2, Division 1 of Housing SEPP, the Proposal is eligible and utilises a 30% HOB and FSR bonus above the existing planning controls for the Site.

✓

Clause 4.4 – Floor Space Ratio

The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.

Compliance with the FSR development standard is unreasonable in the circumstances of the case as the objectives of the standard to ensure that the new residential development has a density, bulk and scale that is consistent with its surrounding built form character are achieved notwithstanding non-compliance with the standard.

The necessity to satisfy anti-throw measures far outweighs the lack of any adverse impact from non-compliance with the FSR development standard.

✗

Clause 5.10 - Heritage Conservation

- (2) Requirement for consent Development consent is required for any of the following—
- (a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance)—
 - (i) a heritage item,
 - (ii) an Aboriginal object,
 - (iii) a building, work, relic or tree within a heritage conservation area,
 - (b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,
 - (c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
 - (d) disturbing or excavating an Aboriginal place of heritage significance,
 - (e) erecting a building on land—
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,
 - (f) subdividing land—
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

The Site is not identified as a heritage item, nor is it located within a heritage conservation zone. Notwithstanding this, it is noted that the Site is within the vicinity of several heritage items.

✓

Clause 5.21 – Flood Planning

- (1) The objectives of this clause are as follows—
- (a) to minimise the flood risk to life and property associated with the use of land,
 - (b) to allow development on land that is compatible with the flood function and behaviour on the land, taking into account projected changes as a result of climate change,
 - (c) to avoid adverse or cumulative impacts on flood behaviour and the environment,
 - (d) to enable the safe occupation and efficient evacuation of people in the event of a flood

The Flood Risk Assessment (**Appendix C**) has considered the requirement to address flood planning matters at the Site. The assessment indicates that overall flood risk to the Site will be reduced through redevelopment, and that the development will achieve the relevant flood planning requirements

✓

Clause 6.1 – Acid Sulfate Soils

- (2) Development consent is required for the carrying out of works described in the Table to this subclause on land shown on the Acid Sulfate Soils Map as being of the class specified for those works.

The Strathfield LEP 2012 identifies the Site comprising Class 5 acid sulfate soils. Development consent is required for the carrying out of works within 500m of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum (AHD) and by which the water table is likely to be lowered below 1 metre AHD on adjacent Class 1, 2, 3 or 4 land. The Site is not located within 500m of Class 1, 2, 3 or 4 land.

✓

Clause 6.2 – Earthworks		
<p>(1) The objective of this clause is to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.</p> <p>(2) Development consent is required for earthworks unless—</p> <p>(a) the earthworks are exempt development under this Plan or another applicable environmental planning instrument, or</p> <p>(b) the earthworks are ancillary to development that is permitted without consent under this Plan or to development for which development consent has been given.</p>	<p>The Geotechnical Assessment (Appendix S) assesses the preliminary design based on earthworks including excavation, vibration and excavation support. The Proposal complies with Clause 6.2 as the Geotechnical Assessment demonstrates that subject to adopting appropriate methods and equipment, the Proposal will not have a detrimental impact on environmental functions and processes or neighbouring uses.</p>	✓
Relevant Guidelines		
Apartment Design Guide		
3A Site Analysis		
<p>Objective 3A-1: Site analysis illustrates that design have been based on opportunities and constraints of the site conditions and their relationship to the surrounding context.</p>	<p>Site analysis information is included in the architectural set. Refer Site Analysis Drawings DA0010 – DA0011</p>	✓
3B Orientation		
<p>Objective 3B-1 Building types and layouts respond to the streetscape and site while optimising solar access within the development</p>	<p>The development is oriented towards Pilgrim Avenue (West) and Albert Road (South), with pedestrian access from both frontages. Buildings are arranged to optimise solar access within the Site.</p>	✓
<p>Objective 3B-2 Overshadowing of neighbouring properties is minimised during mid-winter: · Living areas, private open space and communal open space should receive solar access in accordance with sections 3D Communal and public open space and 4A Solar and daylight access</p>	<p>The proposed development complies with the permissible height and density controls. Due to the location of the Site and the height of the proposed development, some overshadowing to surrounding properties occurs. However, the 'tower' form causes shadows to shift quickly, limiting impact on surrounding properties. Building A is set back from Pilgrim Avenue to minimise impacts on adjoining developments. Given the context, the shadow impacts for the development are reasonable. Refer Shadow Analysis Plans DA0466</p>	✓
3C Public Domain Interface		
<p>Objective 3C-1 Transition between private and public domain is achieved without compromising safety and security</p>	<p>The scheme is designed to ensure that both active and passive surveillance facilitates the transition between private and public spaces. Residential entries and the public domain are visible from upper level units and the ground floor commercial units. Entries will be well-lit, accessible, and secure.</p>	✓
<p>Objective 3C-2 Amenity of the public domain is retained and enhanced</p>	<p>The ground-floor colonnade addresses both street frontages providing all weather access and connection between the lobbies of Buildings A & B,</p>	✓

as well as the commercial tenancies, facilitating and encouraging casual interaction between residents. Both street frontages are enhanced by the proposed works including new paving and street planting. The design minimises the prominence of service areas and car park entries by consolidating and concealing them behind the building and away from the public domain and pedestrian routes.

3D Communal and Public Open Space

<p><i>Objective 3D-1</i> <i>An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping</i></p>	<p>The proposal offers a series of diverse communal spaces across both podium levels as well as Level 05, complemented by extensive planting. (approximately 50% of the site area).</p>	<p>✓</p>
<p>Design Criteria: 1. Communal Open Space has a minimum area equal to 25% of the site</p>	<p>A total of 1,618m², being approximately 50% of the Site area, is provided as communal open space.</p>	<p>✓</p>
<p>2. Developments achieve a minimum of 50% direct sunlight to the principal useable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid-winter)</p>	<p>The communal open space on level 04, being the principal useable communal open space, has a north west / west orientation and receives substantial direct sun, including in excess of 3 hours of solar access to over 50% of its area between 9am and 3pm on the winter solstice.</p>	<p>✓</p>
<p><i>Objective 3D-2</i> <i>Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting</i></p>	<p>As noted, excluding the ground level public space, the project delivers over 1600m² of communal open space (47% of the Site area) over three locations on three levels of the building.</p> <p>The spaces cater to various age groups providing intimate to larger seating areas, small and large scale dining areas with BBQs, integrated children's play spaces, community vegetable garden and two community rooms.</p> <p>Level 0, the Principal Communal Open Space, is the gathering space for larger groups, whilst Level 01 offers small group activity, barbeque and dining areas, kids play and gardening facilities.</p> <p>Level 05 is for quiet activity.</p> <p>The Level 01 & Level 04 communal spaces are connected by an external staircase allowing both ease of access and continuity between them.</p> <p>The landscape design integrates the spaces into a single composition which reflects the different sub climactic conditions of the Site, from highly exposed and sun-drenched plateau to deep and cool gully.</p>	<p>✓</p>
<p><i>Objective 3D-3</i> <i>Communal open space is designed to maximise safety</i></p>	<p>The communal open space areas are located on the podium levels and are not connected to the public domain</p> <p>The communal spaces on Levels 01 and 04 connect both buildings, enjoy both active and passive surveillance and offer multiple points of entry and exit.</p> <p>A number of dwellings open to the level 01 COS.</p>	<p>✓</p>

Objective 3D-4

Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood

The project proposes a number of significant improvements to the public realm along Pilgrim Avenue and, to a lesser extent, Albert Road. These include:



- widening of the footpath along the eastern side of Pilgrim Avenue
- provision of short term parking spaces, vehicular drop off
- motor and push bike parking
- provision of a series of large, deep soil planters along the street verge
- integration of the street frontage within the overall landscape design of the development
- planting of an avenue of street trees along both Pilgrim Ave & Albert Rd
- provision of public seating along Pilgrim Ave
- provision of a series of generous steps within the building along its street frontages connecting the footpath to both Albert St and Pilgrim Ave
- provision of a public colonnade connecting both buildings and providing access to the commercial spaces from both Albert Rd and Pilgrim Ave
- provision of a series of stepped planters along both street frontages connecting the colonnade to the footpath on both Albert Rd and Pilgrim Ave
- provision of a dedicated seating areas within the colonnade for potential café seating

3E Deep Soil Zones

Objective 3E-1

Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality

The subject site is located within a mixed-use area which requires a 'built to boundary' commercial podium. As such, no deep soil area is achievable. However, the design incorporates both deep soil street planting at ground level and a series of substantial planters at Levels 00, 01, 04 & 05. Planters are both generous in width (varying from nominally 1m to over 6m) and soil depth (varying from 600mm to over 2m in depth), providing the opportunity for planting equivalent to that achieved in deep soil zones, including substantial tree planting.



Design Criteria:

1. Deep soil zones are to meet the following minimum requirements:

Site Area	Minimum Dimension	Deep Soil Zone (% of site area)
Less than 650m2	-	7%
650m2 – 1500m2	3m	
>1500m2	6m	
>1500m2 with significant existing tree cover	6m	

3F Visual Privacy

Objective 3F-1

Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy Design Criteria: Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows:

Building Height	Habitable Rooms and Balconies	Non Habitable Rooms
Up to 12m (4 storeys)	6m	3m
Up to 25m (5 – 8 storeys)	9m	4.5m
Over 25m (9+ storeys)	12m	6m

Gallery access circulation should be treated as habitable space when measuring privacy separation distances between neighbouring properties.

Buildings A and P have been designed to maximise outlook and minimise direct lines of sight between units in accordance with the recommendations of the ADG. Windows and balconies are strategically placed to reduce overlooking and enhance privacy. Where necessary privacy screens provide additional privacy in specific locations. Refer to DA0653 of the Architectural Drawings (**Appendix B**).

✓

Objective 3F-2 Site and building design elements increase privacy without compromising access to light and air balance outlook and views from habitable rooms and private open space

Unit layouts are designed to provide generous and unencumbered access to light and air. The proposed louvres, which are adjustable, are primarily to manage heat load.

✓

3G Pedestrian Access and Entries

Objective 3G-1

Building entries and pedestrian access connects to and addresses the public domain

The development incorporates separate entry points to each building from their respective street frontages. Both the entries and lobbies are highly visible and legible and have a direct connection to the street network. Both are connected by the colonnade which wraps around both the street frontages

✓

Objective 3G-2

Access, entries and pathways are accessible and easy to identify

The building entries are positioned with a direct line of sight to and from both the street frontages. The building entries and pathways are universally accessible, with clear wayfinding to ensure ease of navigation for all users. Both the entrances are characterized by variations in building massing, including architectural detailing, public art installations, signage and materials. A colonnade connects both lobbies and provide a frontage for the commercial space. The projecting awnings clearly signify entry points. The awning connects and integrates the entries, clearly announcing and identifying each entry and integrating them with the colonnade and commercial space, creating an engaging and inviting experience within the public domain. The awning, with its serpentine shape, will form part of the Connecting with Country strategy.

✓

Objective 3G-3	The Site, being bounded by a major road, railway line and petrol station has very little opportunity to provide meaningful public space, other than along Pilgrim Avenue.	✓
<i>Large sites provide pedestrian links for access to streets and connection to destinations</i>	The Site is, in part, an 'island' site being bounded by a major road, railway line and petrol station and has very little opportunity to provide meaningful public space, other than along Pilgrim Avenue. The train line and petrol station prevent any through site linkages. As such, the project has been designed to specifically address both its unique location and the challenging context issues from the railway and petrol station. This has included significant improvements to the public domain in both Pilgrim Avenue and Albert Road.	✓
3H Vehicle Access		
Objective 3H-1 <i>Vehicle access points are designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes</i>	The car park entry is positioned behind the building line at the end of Pilgrim Avenue, a cul-de-sac. Pedestrian traffic across the car park entry will be minimal, if any. The car park entry is integrated into the building's façade design. It is not prominently visible from the public domain, resulting in minimal (or no) impact on the streetscape. Both the pedestrian and vehicular entries are clearly separated, with distinct building massing and articulation to visually differentiate their respective use. The design also allows for the future provision of a through site vehicular access to the neighbouring site to the east	✓
3J Bicycle and Car Parking		
Objective 3J-1 <i>Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas</i>	Guide to Traffic Generating Development's as follows: <ul style="list-style-type: none"> • 237 spaces (including 40 accessible spaces and 25 visitor spaces) • 17 spaces for the commercial tenancies • 1 car wash bay All car parking is located off street, in the basement. 	✓
Design Criteria: For development in the following locations: <ul style="list-style-type: none"> • on sites that are within 800 meters of a railway station or light rail stop in the Sydney Metropolitan Area • on land zoned, and sites within 400 meters of land zoned B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre The minimum car parking requirements for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less. The car parking need for a development must be provided off street.	70 residential and 16 visitor bicycle spaces are provided on the ground floor. These spaces are easily accessible from both street frontages, via the residential lobbies. Refer to the Architectural Drawings (Appendix B).	✓

Objective 3J-3 <i>Car park design and access is safe and secure</i>	The car park design and access are clear, safe and secure. All lifts are equipped with well-defined waiting areas on the basement levels.	✓
Objective 3J-4 <i>Visual and environmental impacts of underground car parking are minimised</i>	The basement car park is fully underground. Mechanical ventilation will be provided in accordance with Australian Standards and will be fully integrated within the building design.	✓
Objective 3J-5 <i>Visual and environmental impacts of on-grade car parking are minimised</i>	Not applicable	N/A
Objective 3J-6 <i>Visual and environmental impacts of above ground enclosed car parking are minimised</i>	Not applicable	N/A
4A Solar and Daylight Access		
Objective 4A-1 <i>To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space Design Criteria:</i> <i>1. Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter in the Sydney Metropolitan Area</i>	165 of 228 units (72.4%) receive direct sunlight for a minimum of 2 hours. Refer to the Architectural Drawings (Appendix B).	✓
<i>2. In all other areas, living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9 am and 3 pm at mid winter</i>	Not applicable.	N/A
<i>3. A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid-winter</i>	Only 2 of 228 units (less than 1%) receive no direct sunlight between 9am and 3pm at mid winter. Refer to the Architectural Drawings (Appendix B).	✓
Objective 4A-2 <i>Daylight access is maximised where sunlight is limited</i>	Units are provided with generous frontages and are glazed to the maximum achievable within the BASIX requirements Living areas are located at the front of each unit.	✓
Objective 4A-3 <i>Design incorporates shading and glare control, particularly for warmer months</i>	Sliding external louvre screens have been introduced to address heat and glare control.	✓
4B Natural Ventilation		
Objective 4B-1 <i>All habitable rooms are naturally ventilated</i>	All habitable rooms will be naturally ventilated via a combination of sliding and awning windows and doors. Natural ventilation is further supported by fact that the development is primarily oriented east / west enabling capture of prevailing breezes	✓
Objective 4B-2 <i>The layout and design of single aspect apartments maximises natural ventilation</i>	The depths of single-aspect apartments are designed to support cross ventilation and airflow, with all units being naturally ventilated.	✓

<p>Objective 4B-3 <i>The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents</i></p>	<p>The project achieves natural ventilation for all units. Typically, 60% of units are corner units within the tower buildings. Refer to the Architectural Drawings (Appendix B).</p> <p style="text-align: right;">✓</p>		
<p>Design Criteria: <i>1. at least 60% of apartments are naturally cross ventilated in the first nine storeys of a building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed/</i></p>	<p>58 units or 60.4%, of the units in the first 9 storeys of the development are naturally cross ventilated.</p> <p style="text-align: right;">✓</p>		
<p><i>2. Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.</i></p>	<p>The depth of cross through apartments does not exceed 18m, measured glass line to glass line.</p> <p style="text-align: right;">✓</p>		
<p>4C Ceiling Heights</p>			
<p>Objective 4C-1 <i>Ceiling height achieves sufficient natural ventilation and daylight access.</i></p>	<p>The following floor to floor heights have been provided:</p> <ul style="list-style-type: none"> • Level 00: 5.5m (commercial) • Levels 01 – 19: 3.2m (residential) <p style="text-align: right;">✓</p>		
<p><i>Design Criteria: Measured from finished floor level to finished ceiling level, minimum ceiling heights are:</i></p>	<p>Generally, a minimum floor to floor height of 3.2m has been provided for the residential units. this ensures a minimum floor to ceiling height within units of 2.7m. Refer to DA0201-DA0302 of the Architectural Drawings (Appendix B) for elevations and sections.</p>		
<p>Minimum ceiling height for apartment and mixed-use buildings.</p>			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Habitable rooms</td> <td style="text-align: center;">2.7m</td> </tr> </table>	Habitable rooms	2.7m	
Habitable rooms	2.7m		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Non-habitable rooms</td> <td style="text-align: center;">2.4m</td> </tr> </table>	Non-habitable rooms	2.4m	
Non-habitable rooms	2.4m		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">For 2 storey apartments</td> <td style="text-align: center;">2.7m for main living area floor. 2.4m for second floor, where its area does not exceed 50% of the apartment area</td> </tr> </table>	For 2 storey apartments	2.7m for main living area floor. 2.4m for second floor, where its area does not exceed 50% of the apartment area	
For 2 storey apartments	2.7m for main living area floor. 2.4m for second floor, where its area does not exceed 50% of the apartment area		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Attic spaces</td> <td style="text-align: center;">1.8m at edge of room with a 30-degree minimum ceiling slope.</td> </tr> </table>	Attic spaces	1.8m at edge of room with a 30-degree minimum ceiling slope.	
Attic spaces	1.8m at edge of room with a 30-degree minimum ceiling slope.		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">If located in mixed use areas</td> <td style="text-align: center;">3.3m for ground and first floor to promote future flexibility of use.</td> </tr> </table>	If located in mixed use areas	3.3m for ground and first floor to promote future flexibility of use.	
If located in mixed use areas	3.3m for ground and first floor to promote future flexibility of use.		
<p>These minimums do not preclude higher ceilings if desired.</p>			
<p>Objective 4C-2 <i>Ceiling height increases the sense of space in apartments and provides for well-proportioned rooms</i></p>	<p>Ceiling heights comply with the recommendations of the ADG. A minimum floor to floor height of 3.2m has been provided.</p> <p style="text-align: right;">✓</p>		
<p>Objective 4C-3 <i>Ceiling heights contribute to the flexibility of building use over the life of the building</i></p>	<p>The floor-to-floor height of 5.5m has been provided for the ground floor commercial spaces and lobbies.</p> <p style="text-align: right;">✓</p>		

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

All apartments exceed the minimum internal areas required by this criteria.

✓

Design Criteria:

1. Apartments are required to have the following minimum internal areas:

Apartment Type	Minimum Internal Area
Studio	35m ²
1 Bedroom	50m ²
2 Bedroom	70m ²
3 Bedroom	90m ²

The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m² each. A fourth bedroom and further, additional bedrooms increase the minimum internal area by 12m² each.

2. Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms.

The development provides a high level of glazing to all units. The proposed glass area for habitable rooms is in accordance with, or exceeds, the requirements of the NCC.

✓

Objective 4D-2

Environmental performance of the apartment is maximised

Design Criteria:

1. Habitable room depths are limited to a maximum of 2.5 x the ceiling height

The building has been designed to comply with the requirements of this criteria

✓

2. In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window

All open plan layouts have a maximum depth from a window of less than 8m. Living areas and bedrooms are located on the external faces of the building for solar access, ventilation and outlook.

✓

Objective 4D-3

Apartment layouts are designed to accommodate a variety of household activities and needs

Design Criteria

1. Master bedrooms have a minimum area of 10m² and other bedrooms 9m² (excluding wardrobe space)

All master bedrooms have areas greater than 10m². All other bedrooms have areas greater than 9m².

✓

2. Bedrooms have a minimum dimension of 3m (excluding wardrobe space)

All bedrooms have a minimum dimension of 3m or greater, excluding wardrobes

✓

3. living rooms or combined living/dining rooms have a minimum width of <ul style="list-style-type: none"> • 3.6m for studio and 1-bedroom apartments • 4m for 2 and 3 bedroom apartments 	All living rooms have a minimum width of 3.6m or 4m, as required.	✓
---	---	---

4. The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts	The width of all cross through apartments is at least 4m.	✓
--	---	---

4E Private Open Space and Balconies

Objective 4E-1 Apartments provide appropriate sized private open space and balconies to enhance residential amenity	All units are provided with primary balconies that meet or exceed with the requirements for this criteria. Refer to DA0501-DA0531 of the Architectural Drawings (Appendix B) for the typical unit layouts.	✓
--	---	---

Design criteria:

1. all apartments are required to have primary balconies as follows:

Dwelling Type	Minimum Area	Minimum Depth
Studio	4m ²	-
1 Bedroom	8m ²	2m
2 Bedroom	10m ²	2m
3 Bedroom	12m ²	2.4m

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

2. For apartments at ground level or on a podium or similar structure, a private open space is provided instead of a balcony. It must have a minimum area of 15m ² and a minimum depth of 3m	The project has been designed to minimise the intersection of communal open space and private open space. Only one unit, Unit A 013, faces into a communal open space, whilst 3 units, Unit P011, A014 and A015 have front doors opening to the undercroft area adjacent to level 01 communal open space. The private open space of unit A013 is separated from the communal open space by a substantial planter and exceeds the area and size requirements.	✓
---	--	---

Objective 4E-2 Primary private open space and balconies are appropriately located to enhance liveability for residents	All balconies connect directly to the primary living areas and generally located to maximise solar access and/or outlook	✓
---	--	---

Objective 4E-3 Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building	The balconies and private open space of all units have been designed to be integral within the overall composition and form of the building. They are a key part of the architectural language and detailing of the project.	✓
---	--	---

Objective 4E-4	Typical balcony balustrade heights are 1100mm.	✓
----------------	--	---

Private open space and balcony design maximises safety

4F Common Circulation and Spaces

Objective 4F-1

Common circulation spaces achieve good amenity and properly service the number of apartments

Design Criteria: 1. The maximum number of apartments off a circulation core on a single level is eight

The maximum number of apartments off a circulation core on a single level is 9. This occurs on Levels 01-03 of Building P only. The circulation core is serviced by 3 lifts and is separated into two distinct corridors, at right angles to one another. Both corridors have direct access to natural light and ventilation. As such, the arrangement is considered to achieve a high level of amenity and to deliver the desired outcomes of the ADG.

✓

2. For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40

Building P includes a total of 147 units and is serviced by 3 lifts. As such, the maximum number of units sharing a single lift is less than 50.

✓

Objective 4F-2 Common circulation spaces promote safety and provide social interaction between residents

The corridors have been designed to provide, not only a high level of amenity but also excellent natural light and ventilation. The Corridor in Building A is generally only 12m long and serves only 4 units. The corridor in Building P, whilst longer and serving 8 units is open at both ends providing excellent light and ventilation. It widens at the lifts to provide generous space and amenity for residents. Clear sight lines are available along the length of each corridor segment. No tight corners or spaces are proposed. Legible signage will be provided.

✓

4G Storage

Objective 4G-1

Site analysis illustrates that design decisions have been based on opportunities

All units are provided with storage in accordance with the requirements of this criteria.

✓

At least 50% of the required storage volume is located within the apartment. Additional storage cages for all the units are provided within the basement

Design Criteria

1.in addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided:

Dwelling Type	Storage Size Volume
Studio	4m2
1 Bedroom	6m2
2 Bedroom	8m2
3 Bedroom	10m2

At least 50% of the required storage is to be located within the apartment

Objective 4G-2 <i>Additional storage is conveniently located, assible and nominated for apartments</i>	Each apartment has convenient and accessible additional storage space within the basement with over 50%of the minimum required storage located within the apartments.	✓
4H Acoustic Privacy		
Objective 4h-1 <i>Noise transfer is minimised through the siting of buildings and building layout</i>	The buildings are designed to minimise units facing and impacting on each other.	✓
Objective 4H-2 <i>Noise impacts are mitigated within apartments through layout and acoustic treatments</i>	The proposed wintergardens on the northern end of the Building P addresses the anti-throw requirements of Sydney Trains and assist with acoustic amenity and noise mitigation.	✓
4J Noise and Pollution		
Objective 4J-1 <i>In noisy or hostile environments, the impacts of external noise and pollution are minimised through the careful siting and layout of buildings</i>	A detailed acoustic assessment of the project was undertaken by a suitably qualified acoustic consultant and the recommendations of their analysis incorporated into the design. The Acoustic Report (Appendix Q) confirms that the proposed development will comply with all relevant noise and acoustic standards including those outlined in the Transport and Infrastructure SEPP, AS/NZS 2107 and Strathfield Council regulations.	✓
Objective 4J-2 <i>Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission</i>	A detailed acoustic report includes recommendations for noise shielding which have been incorporated into the design	✓
4K Apartment Mix		
Objective 4k-2 <i>The apartment mix is distributed to suitable locations within the building</i>	The apartment mix is distributed equitably throughout the development with a mix of unit types on all floors.	✓
4L Ground Floor Apartments		
Objective 4L-1 <i>Street frontage is maximised where ground floor apartments are located</i>	Not Applicable.	N/A
Objective 4L-2 <i>Design of ground floor apartments delivers amenity and safety for residents</i>	Not Applicable.	N/A
4M Facades		
Objective 4M-1 <i>Building facades provide visual interest along the street while respecting the character of the local area</i>	The design of the project is based on offering a contemporary building that utilises a limited, but durable and sustainable palette of external materials.	✓

	<p>The materials are used to express and differentiate the elements of the buildings, with the concrete forming the base material and the bronze its counter balance.</p> <p>This palette supports a range of forms and expressions from precast concrete walls, to projecting slabs, to window fenestration, louvres, awnings and hoods</p>	
<p>Objective 4M-2 <i>Building functions are expressed by the facade</i></p>	<p>The composition of the building, an assemblage of forms, balances and refines the bulk of the buildings through the management of their proportions and the expression of each portion as a stand-alone element, with an emphasis on identifying the various functions from entry lobbies to individual apartments.</p>	✓
4N Roof Design		
<p>Objective 4N-1 <i>Site analysis illustrates that design decisions have been based on opportunities and constraints</i></p>	<p>The design integrates the rood into the overall massing and articulation of the project. This includes inclusion of continuation of the building articulation and materials palettes into the roof design.</p>	✓
<p>Objective 4N-2 <i>Opportunities to use roof space for residential accommodation and open space are maximised</i></p>	<p>The buildings are 20 storeys high. Their roof tops will be remote, very windy and offer limited amenity. The podiums on Level 01-04 and 05 have been designed to accommodate multi-level communal open spaces and landscaping, offering residents easily accessible, high-amenity environment for recreation and relaxation.</p>	✓
<p>Objective 4N-3 <i>Roof design incorporates sustainability features</i></p>	<p>The installation of a solar PV array on the roof supports onsite renewable energy generation.</p>	✓
4O Landscape Design		
<p>Objective 4O-1 <i>Landscape design is viable and sustainable</i></p>	<p>The landscape design has been developed to not only reflect the different sub climatic conditions on the Site, from highly exposes and sundrenched plateau to deep and cool gully but also to be primarily based on the use of native and indigenous species. The landscape design which includes substantial tree planting, edible species and community allotments, offers opportunities for educating residents about Australia flora and traditional aboriginal edible and medicinal plants.</p>	✓
<p>Objective 4O-2 <i>Landscape design contributes to the streetscape and amenity</i></p>	<p>The project design reconstructs the eastern side of Pilgrim Avenue and introduces a series of substantial planted verges whilst delivering drop off space, short term parking and bike parking. Pilgrim Avenue will be repaved creating an integrated and seamless public frontage to the development.</p> <p>Planting has been designed to create a generous avenue of trees encroiling the building. Planters are located at both ground and</p>	✓

	colonnade level within the building, addressing and mediating the 1m level change required for flood mitigation.	
4P Planting on Structures		
Objective 4P-1 <i>Appropriate soil profiles are provided</i>	All planter beds and planting on structures will include soil climate capable of supporting a variety of plant types and sizes. Planters are both generous in width (varying from nominally 1m to over 6m) and soil depth (varying from 600mm to over 2m in depth).	✓
Objective 4P-2 <i>Plant growth is optimised with appropriate selection and maintenance</i>	The species selection, which is predominantly native and indigenous, has been selected both for its stability to the Site (including both location and planter size) and to ensure the development delivers a successful, convincing, varied and beautiful landscape setting and character.	✓
Objective 4P-3 <i>Planting on structures contributes to the quality and amenity of communal and public open spaces.</i>	Substantial and appropriate planting is incorporated within the planters forming part of the ground-floor colonnade along both the street frontages, and within the communal open spaces on multiple levels.	✓
4Q Universal Design		
Objective 4Q-1 <i>Universal design features are included in apartment design to promote flexible housing for all community members</i>	The proposed development incorporated 35 (15%) adaptable apartments. These apartments incorporate LHA silver level universal design features in their "preadapted configuration". Additionally, a further 15 units incorporate PHA Silver Level features, providing a total of 50 (22%) units with Universal Design Features.	✓
Objective 4Q-2 <i>A variety of apartments with adaptable designs are provided</i>	As stated above, 35 units (15%) are designed to be adaptable, with 35 accessible parking spaces provided. Adapting these units will require minimal structural modifications and will not compromise residential amenity.	✓
Objective 4Q-3 <i>Apartment layouts are flexible and accommodate a range of lifestyle needs</i>	Apartment layouts have the ability to be flexible for future residents, for example the 2+ bedroom units could allow for a separate TV room, study or home office. Units incorporate living areas capable of containing multiple activities.	✓
4R Adaptable Reuse		
Objective 4R-1 <i>New additions to existing buildings are contemporary and complementary and enhance and area identity and sense of place.</i>	Not applicable.	N/A
Objective 4R-2 <i>Adapted buildings provide residential amenity while not precluding future adaptive reuse.</i>	Not applicable.	N/A

4S Mixed Use		
Objective 4S-1 <i>Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement</i>	The Proposal contributes positively to the public domain by providing an active street frontage with commercial premises and colonnade fronting both Albert Road and Pilgrim Avenue.	✓
Objective 4S-2 <i>Residential levels of the building are integrated within the development, and safety and amenity is maximised for residents.</i>	The residential building entries are located on both street frontages, with the residential lobbies clearly defined by deep vertical recesses in the building façade. Commercial service and parking areas are segregated from residential facilities. Communal open spaces and landscaping are provided on Level 01, 04, and 05 and do not interfere with other uses.	✓
4T Awnings and Signage		
Objective 4T-1 <i>Awnings are well located and complement and integrate with the building design</i>	<p>The colonnade, seamlessly integrates in the building design and extends along both street frontages, providing shelter and enhancing public and resident amenity as a public benefit.</p> <p>The bronze coloured suspended awning connecting the entrances of Building A to Building P, will be a major element of the building at ground level.</p> <p>The serpentine nature of awning in collaboration with the boomerang shape of the ramp and planting, offers a subtle but serious opportunity for referencing First Nations and iconography.</p>	✓
Objective 4T-2 <i>Signage responds to the context and desired streetscape character</i>	Signage is integrated into the building entrance design. Each building will have a highly visible and attractive sign announcing the building by name on its street frontage adjoining the entry lobby.	✓
4U-Energy Efficiency		
Objective 4U-1 <i>Development incorporates passive environmental design</i>	The development incorporates passive environmental design principles to achieve 7-star NatHERS average.	✓
Objectives 4U-2 <i>Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer</i>	<p>Passive design strategies include:</p> <ul style="list-style-type: none"> • Installation of solar PV panels on the roof. • Integration of winter gardens along the rail corridor • Tree canopy coverage along the Site frontage to provide shade and mitigate heat • Landscape design and extensive planting to reduce urban heat effects • The architectural design features a carefully chosen palette of colours, materials, and finishes that are responsive to the local climate. 	✓
Objective 4U-3 <i>Adequate natural ventilation minimises the need for mechanical ventilation.</i>	59 units (60.4%) of the units achieve cross ventilation in the first 9 levels. Adequate natural ventilation is provided to habitable rooms and	✓

common circulation corridor to minimise reliance on mechanical systems.

4V Water Management and Conservation

Objective 4V-1 <i>Potable water use is minimised</i>	Water efficiency measures will be implanted as per the requirements of the projects BASIX Certificate. A Rainwater tank will be installed and water efficient appliances will be utilised throughout the development. Drought-tolerant, low-water-use plants will be incorporated into the landscape areas.	✓
Objective 4V-2 <i>Urban stormwater is treated on site before being discharged</i>	As on-site detention tank has been provided. The projects stormwater management system will be in accordance with relevant regulations.	✓
Objective 4V-3 <i>Flood management systems are integrated into site design</i>	To areas flood constraints on the Site the ground floor level has been set at RL10.460 which is a nominally 1m above the footpath on Pilgrim Avenue and 540mm above the 1 in 100 year ARI (average recurrence interval) + 540mm.	✓
Wats 4W-1 <i>Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity or residents.</i>	The design provides bin rooms on each level. Waste storage facilities are located on Level 00 at the rear of the building, close to the loading dock a fully concealed from street view. The design allows for bins to be easily moved between storage rooms and collection points without interfering with resident amenity and the public domain.	✓
Objective 4W-2 <i>Domestic waste is minimised by providing safe and convenient source separation and recycling</i>	Source separation and recycling systems are provided to minimise domestic waste. The Proposal is capable of incorporating alternative waste disposal, such as a compost bin.	✓

4X Building Maintenance

Objective 4X-1 <i>Building design detail provides protection from weathering</i>	The proposed building material selection, building design details and roof design will provide appropriate protection from weathering. Painted and applied finishes are minimised.	✓
Objective 4X-2 <i>Systems and access enable ease of maintenance</i>	The buildings have been to minimise the need for external maintenance of the façade. Access to all maintenance areas provided, notably basement and roof level services. Convenient access is also ensured to all communal open spaces.	✓
Objective 4X-3 <i>Material selection reduces ongoing maintenance costs</i>	The design of the project utilises a limited but durable palette of exterior materials being primary off form concrete, glass and bronze powder-coated metal. All materials have been selected for the long term durability and low maintenance offsetting the embodied energy of their production.	✓

