

Ecologically Sustainable Development (ESD) Report

12-20 Berry Road & 11-19 Holdsworth Avenue
St Leonards

State Significant Development Application

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E-LAB Consulting
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We recognise the Traditional Custodians of the land on which the proposed development will be constructed. We respect their enduring cultural and spiritual connections to the land and waters, and celebrate their knowledge, kinship, and values. We acknowledge that these connections to the land and waters have existed for millennia and will continue into the future. We respect the Elders who have gone before, together with those of today for their guidance on our shared journey. We recognise that we are, and always will be, on Aboriginal land.

EXECUTIVE SUMMARY

This Ecologically Sustainable Design Report has been prepared by E-LAB Consulting to accompany a detailed State Significant Development Application (SSDA) for the residential development at 12-20 Berry Road & 11-19 Holdsworth Avenue, St Leonards.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project.

This report concludes that the proposed development is suitable and warrants approval subject to the implementation of the following mitigation measures.

- **Net Zero Operational Carbon ready** by 2035 in line with the NSW commitment to reduce fossil fuel dependence.
- **Renewable Energy Procurement** equivalent to Net Zero Emissions for all retail (base building) and office energy demands.
- **Compliance** with to **BASIX Energy, Water and Thermal Comfort** targets including.
 - **Energy 63%**
 - **Water 40%**
 - **Thermal Comfort:**
- Delivering a high level of thermal performance, demonstrated through a **7.2 Star average** and **6 Star minimum NatHERS rating** across the development
- Following a range of sustainability initiatives across the site spanning **energy efficiency, water efficiency, indoor environment quality, waste management and comfort**.
- Alignment to Green Star buildings and sector specific apartment outcomes, noting the GBCA has released the **Green Star Buildings – Apartments Pathway v1** in October 2024 and the suitability of the rating tool is under further investigation.

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

1 INTRODUCTION

1.1 DEVELOPMENT OVERVIEW

The application seeks development consent for the development of 12-20 Berry Road & 11-19 Holdsworth Avenue, St Leonards consist of two mid-rise apartment buildings. Specifically, the SSDA seeks development consent for:

Site preparation works including bulk excavation and earthworks.

The development consists of the following spaces but is not limited to:

- 2 residential apartment buildings which have a combined 188 apartments with varying bedrooms and sizes with associated balconies
- A shared 3 level basement for carparking and supporting infrastructure
- Communal spaces in each apartment building
- Communal outdoor spaces in each apartment building rooftop and ground floor

1.2 PURPOSE

The purpose of the project is to facilitate the delivery of high-quality, diverse housing space at a strategically located site. The proposal seeks to deliver a built form outcome that responds appropriately to its location at St Leonards.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs). Specifically, this report has been prepared to respond to the SEARs requirement as below.

Table 1 SEARs Requirements

Item	Description of Requirement	Section Reference
Ecologically Sustainable Developments	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

1.3 THE SITE

The site is located at 12-20 Berry Road & 11-19 Holdsworth Avenue, St Leonards. The site is located in the Local Government Area of Lane Cove Municipal Council. The immediate surrounding area of the development is a mix of stand-alone residential dwellings and mid-rise apartment buildings.



Figure 1 Site Location (Source: Google maps)

2 GOVERNING ESD FRAMEWORKS & POLICY

The development's guiding principles and overall performance has been designed in line with the following general requirements and documents:

- NSW Environmental Planning and Assessment (EPA) Regulation 2021
- State Environmental Planning Policy (SEPP), Sustainable Buildings, 2022
- National Construction Code (NCC) 2022 Volume 1, Section J
- NSW Department of Planning, Industry and Environment (DPIE), Net Zero Plan 2020-2030.
- The Lane Cove Development Control Plan (DCP), 2012.
- The Lane Cove Local Strategic Planning Statement

2.1 RESPONSE TO SEARS: NSW EPA REGULATION 2021

The principles of Ecologically Sustainable Development to which the development should generally adhere to are defined within Part 8, Division 5, clause 193 of the NSW EPA Regulation 2021 and are listed in Table 2, alongside how the project has incorporated the principles within in the design and ongoing operation of the development.

Table 2 EPA ESD Principles and Response

Principles	Project Response
(2) The Precautionary Principle is that 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. (3) In applying the precautionary principle, public and private decisions should be guided by— (a) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and (b) an assessment of the risk-weighted consequences of various options.	The project will employ relevant environmental protection measures and risk assessments to ensure no irreversible environmental harm is acted as a result of the construction or operation of the development. Refer to section 2 for further detail. During construction, it is intended the main contractor will implement an independently certified Environmental Management System (EMS) that will demonstrate a formalised systematic and methodical approach to planning, implementing and auditing for environmental management. During operation, adherence to procedures that account for environmental risk and mitigation measures will be met.
(4) Inter-generational Equity is that the present generation should ensure the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.	The project will ensure no irreversible environmental harm is acted as a result of the construction or operation of the development. The design team will address key elements such as energy, potable water and material use to do all which is within the project's control to ensure future generations have equal opportunity and access to the environment. Refer to Section 3 for further detail.
(5) Conservation of Biological Diversity and Ecological Integrity is that the conservation of biological diversity and ecological integrity should be a fundamental consideration.	The site can be considered to have low-ecological value and biodiversity significance as it is already developed and within an urban area. In response to this, the project is committed to planting a high proportion of native vegetation to improve site ecology and managing stormwater runoff from the site to minimise onset impacts. The development intends to improve on the existing biological diversity and ecological integrity of the site.

Principles

(6) Improved Valuation, Pricing and Incentive Mechanisms is that environmental factors should be included in the valuation of assets and services, such as—

- (a) *polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,*
- (b) *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,*
- (c) *established environmental goals 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 problems.*

Project Response

The project is committed to achieving a high construction waste diversion target of 99% from landfill as well as developed specific project waste management strategies. The project shall ensure the full life cycle impacts of goods and services employed throughout the project have been considered. Further, it will be designed to minimise operational energy and water consumption.

2.2 STATE ENVIRONMENTAL PLANNING POLICY (SEPP), SUSTAINABLE BUILDINGS, 2022

Residential Development components of the project must adhere to Schedule 1 and Schedule 2 of the SEPP through demonstrating compliance with energy, thermal comfort, water and embodied emissions (materials index) reporting using the current NSW BASIX tool. Refer to Section 3.7 for BASIX targets.

Non-Residential Development components of the project must demonstrate design considerations which enable or integrate the following;

Table 3 Non-Residential SEPP Response

Requirement	Response
(a) Minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,	Refer to Section 3.4 which outlines minimisation of waste.
(b) Reduction in peak demand for electricity, including through the use of energy efficient technology,	Refer to Section 3.1 which discusses reduction in electricity and energy through efficient systems and monitoring.
(c) Reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,	Refer to Section 3.1 and 3.5 which outlines the design responses to reduce reliance on artificial lighting and mechanical systems to achieve visual and thermal comfort.
(d) Generation and storage of renewable energy,	Refer to Section 3.1 which discusses the provision of a PV system and its associated generation and storage.
(e) Metering and monitoring of energy consumption,	Refer to Section 3.1 which discusses energy metering and monitoring.
(f) Minimisation of the consumption of potable water.	Refer to Section 3.2 which discusses the efficient systems in place to minimise water use and the strategies in place to recycle and re-use water throughout the development.
Quantification of the embodied emissions attributable to the development using the NABERS tool disclosed at development application and construction certificate stages.	The development will declare materials for embodied emissions reporting through the BASIX tool and the NABRES Embodied Emissions Reporting Form. Once this benchmarking has occurred, the project team will investigate methods of reducing embodied emissions through materials selections during design development.

2.3 NATIONAL CONSTRUCTION CODE (NCC), 2022, VOLUME ONE, SECTION J (ENERGY EFFICIENCY)

The development will ensure the energy use of the proposed building adheres to the relevant minimum performance requirements as set out within Section J of the NCC, 2022. The development will manage energy use whilst maintaining a high degree of human comfort through the use of high-performance thermal fabric elements and efficient building service equipment. Refer to Section 3.1 and **Error! Reference source not found.** for further details.

2.4 NSW DEPARTMENT OF PLANNING, INDUSTRY AND ENVIRONMENT (DPIE), NET ZERO PLAN 2020-2030.

The development will be constructed and operated to contribute towards the net zero priorities as outlined within the DPIE, Net Zero Plan 2020-2030. This will be achieved through the prioritization of energy efficiency and on-site renewable energy generation capacity. The development is actively aiming to adhere to the Government's goal of net zero emissions by 2050 through a range of strategies discussed in following sections of this report.

The approach to minimising greenhouse gas emissions should always follow a reduction first – outcomes-based approach to decarbonisation which in turn will provide an approach to net zero emissions. This approach generally involves:

- Avoid: Identify carbon intensive activities and sources that can be avoided or eliminated from the development.
- Reduce: Reduce the carbon intensity of activities and sources through improved technology or process.
- Transition: Transition to renewable electricity.

2.5 THE LANE COVE DEVELOPMENT CONTROL PLAN. PART S – ENVIRONMENTAL SUSTAINABILITY

The development is required to meet the following driving objectives and provisions as outlined within the Lane Cove DCP:

Table 4 The Lane Cove DCP Objectives

No.	Objective
1	Achieving Net-zero by 2035.
2	Incorporating measures to improve resilience and general health of its occupants.
3	Positively contributing to the surroundings environment through an integrated urban management approach.

2.6 THE LANE COVE LOCAL STRATEGIC PLANNING STATEMENT

The development must meet the following planning priorities outlined in The Lane Cove Local Strategic Planning Statement

Table 5 The Lane Cove LSPS Priorities

Priority	Description	Addressed In
10	Enhance urban tree canopy, bushland and waterways	Section 3.3
11	Improve the management of energy, water and waste resources	Section 3.4
12	Adapt to the changing climate and natural and urban hazards by building resilience	Section 3.3

2.7 DESIGN PRINCIPLES OF GREEN STAR BUILDINGS AND APARTMENTS PATHWAY

Green Star Buildings is an internationally recognised framework, administered by the Green Building Council of Australia (GBCA), that wholistically rates the sustainable design outcomes of a project. As of October 2024, the GBCA released the additional Apartments Pathway which provides greater adaptability of the tool to residential projects. The seven categories identified in the Green Star Buildings rating tool are summarised below:



Figure 2 Green Star Buildings Categories

Where possible, the project aims to adopt the principles of the categories outlined above within the design of the development to deliver a wholistic sustainable design response. The project is committed to align its design and focus to the credit outcome and not the credit criteria.

Further investigation to the suitability of the Green Star rating tool is required given the multi-use development building typology.

Table 6 Design Intent Alignment

Focus Area	Design Intent	Aligned Credits
Healthy Buildings	Create healthy spaces that support occupant comfort and liveability.	Credit 10: Clean Air Credit 11: Light Quality Credit 12: Acoustic Comfort Credit 13: Exposure to Toxins Credit 15: Connection to Nature
Minimise Resource Consumption	Reduce energy and water consumption, minimise upfront and operation emissions, electrified buildings.	Credit 21: Upfront Carbon Emissions Credit 22: Energy Use Credit 23: Energy Source Credit 24: Other Carbon Emissions Credit 25: Water Use
Head Contractor Responsibilities	Promote responsible and inclusive construction practices.	Credit 31: Inclusive Construction Practices Credit 32: Indigenous Inclusion Credit 33: Procurement and Workforce Inclusion

3 SUSTAINABLE DESIGN INITIATIVES

The only path to a low carbon economy and achieving a “2°C world” where the average global temperature is kept to less than 2°C above pre-industrial levels is through comprehensive and complete consideration of how the development consumes resources. The proposed strategy focusses on energy, water, and materiality to ensure resource use is appropriate and to address the requirements identified by the governing ESD frameworks and policies outlined in Section 2.



Fully Electrified

No fossil fuels used on site allowing for operational net zero.



Communal & Landscaped Areas

Extensive outdoor areas and Native landscaping provide connection to nature and Connection to Country.



7.2 Star NatHERS Average

Effective passive design strategies to reduce energy consumption and maintain thermal comfort. High performance façade systems, façade shading, and consideration of window to wall ratio to reduce solar gain.



Hybrid / Naturally Ventilated Corridors

Reduced HVAC energy consumption.



Efficient Lighting Systems

Use of LED lighting to reduce overall lighting power density.



Sustainable Materials

Use of materials with sustainability and transparency initiatives and reduced embodied carbon.



Solar PV Provision

65 kW peak solar PV array to minimise building energy consumption and reduce peak load demand.



Healthy Materials

Low VOC paints, adhesives and sealants, and low formaldehyde engineered wood products to minimise impacts on occupant health.



Active Transport

Provision of high quality end of trip facilities on ground floor and bicycle parking to encourage active transport.



Embodied Emissions Reporting

Within BASIX and Material Form as per SEPP requirements.



Water Efficiency

50 kL Rainwater harvesting tank servicing irrigation. Use of efficient fixtures & appliance to minimise water consumption.



3.1 ENERGY & GREENHOUSE GAS EMISSIONS

The energy efficiency strategy generally follows the energy efficiency hierarchy strategy in Figure 3 below. The development will prioritize in the first instance to reduce the demand for energy consumption through the optimization and sizing of active systems in tandem with implementing passive design principles. The use of energy can then be made more efficient through integrating efficiencies into high demand systems such as heating, cooling, hot water, ventilation, lighting and other appropriate building services.

Once the development has reduced the demand of energy-consuming elements as much as feasible and introduced efficiency measures, renewable energy sources (both on and off site) shall be considered to supply the development with the required remaining energy. Considering spatial limitations on the roof levels, solar photovoltaics will be sized to maximize on-site renewable energy generation potential. Only after all the above major steps have been completed should offsets be investigated to close the gap in order to achieve operational carbon neutrality.

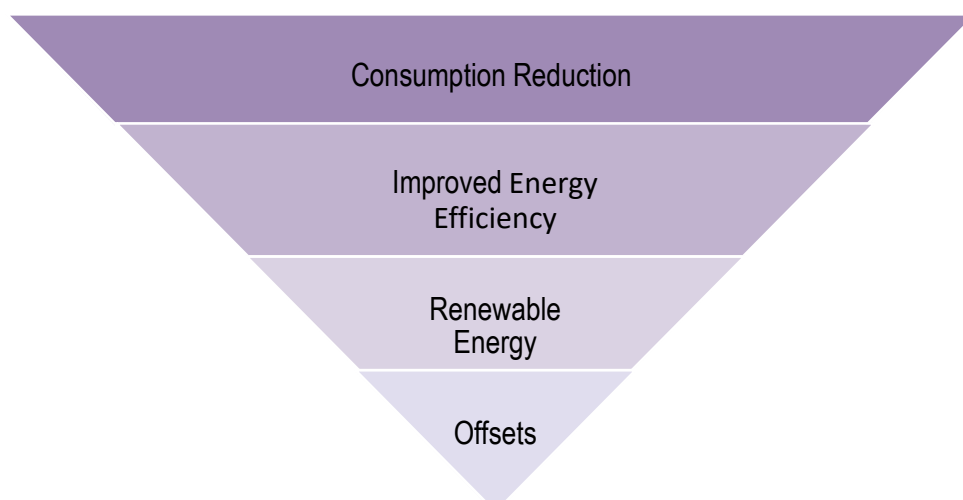


Figure 3: Energy Hierarchy

To achieve the above, the following initiatives are being sought to be implemented:



Renewable Energy – A 65 kW peak system will allow the development to generate renewable electricity to offset demand and minimise stress on the grid. PV will be installed at a rate that maximises the coverage of the non-trafficable roof area.



Fully Electrified – The building has been designed to be fully electrified, to enable operational net zero through the procurement of renewable electricity.



Efficient Lighting Systems – High efficiency LED lighting throughout, including common areas with efficiency controls. Controls will include motion and daylight sensors, timers and zoned switching which will help reduce the unnecessary consumption of energy. Lighting power density should be designed to at least 10% below that required by Section J of the NCC.



Passive Design – The balance between daylight access and thermal exchange will be a priority of the design team to ensure occupant comfort and energy performance is maximized. Building massing, form, orientation, shading analysis and high-performance building fabric elements should all be considered to achieve the required energy

performance targets. Proper sealing of the envelope through construction practices and verification will also be considered to ensure undesirable energy flows are minimized.



Hot Water – Hot water will be provided by energy efficient heat pump systems. These systems are highly efficient which will allow users to reduce their energy consumption. Showers and taps with a high WELS rating should be used to reduce water demand from hot water fixtures across the development.



Appliances & Equipment – Appliances and centralised equipment will be selected with a high energy efficiency/performance to ensure reduced energy consumption.



Low emission Transportation – To encourage low-emission transport alternatives bicycle parking and ancillary end-of-trip facilities shall be provided. Pedestrian access to nearby public transport networks such as bus and rail will be maximised.

3.2 WATER

To achieve responsible water consumption and water sensitive urban design, best practice water-saving initiatives will need to be implemented across the project. The following initiatives will be explored to achieve the potable water targets:

Sanitary Fixtures – By implementing low-flow water fixtures, the consumption will be significantly reduced. All sanitary fixtures are to be provided with the minimum Water Efficiency Labelling Scheme (WELS) star rating identified below.

- Toilets: 4 Star
- Kitchen Taps: 5 Star
- Bathroom Taps: 5 Star
- Showers: 3 Star
- Clothes Washing Machine: 5 Star
- Dishwashers: 5 Star



Landscape Irrigation – Efficient irrigation systems will be implemented, including sub-surface drip systems, moisture sensors, and the prioritization of native plants. Native plants have evolved to thrive in the Australian environment and are typically more resilient than their exotic counterparts, they typically require less water and are more likely to survive the predicted increase in extreme drought conditions due to climate change. Native vegetation also stores a significant amount of carbon, further helping to mitigate the effects of climate change.



Rainwater – the development will supply irrigation demand from a 50-kL on-site rainwater tank. Rainwater will be captured from the roof areas of the building to reduce reliance on mains water for reasonable non-potable applications such as irrigation.



WSUD & Stormwater Management – An integrated stormwater strategy will be developed for the site considering the impacts of future flood predictions under climate projections and in-line with council planning requirements. Stormwater quality (pollutant loading) and volume discharged from site will be a key consideration in future design stages to ensure the development has minimal environmental impact on local waterways, council infrastructure and ecology compared to the pre-development baseline.



3.3 CLIMATE RESILIENCE & URBAN HEAT ISLAND

Resiliency planning with respect to science-based climate projections is a crucial tool in decision making for any proposed development to ensure the investment in social and community infrastructure is secure and assets can operate effectively for years to come. The proposed development should undertake a risk assessment of the potential impacts of climate change (such as flooding, drought, extended periods of high temperature, rising utility infrastructure costs etc.) and include design response which specifically address identified risks deemed to be of high or extreme significance.

Design responses should include:

- HVAC sizing and substation load allowance to accommodate anticipated extreme weather events,
- Ample stormwater drainage and flood management systems to minimize localised flooding which may cause failure of critical systems/infrastructure and access/egress of site,
- Operable facades and access to ventilation for occupied spaces in the event of a blackout.

Undertaking a climate risk assessment during early design stages will improve the development's ability to respond to the threats imposed by climate change and improve operational resiliency whilst also addressing the requirements for the EPA such as Inter-generational Equity and the Precautionary Principle.

The Urban Heat Island Effect must also be addressed to reduce the excessive retention of solar heat within and around external environments. Currently, the site is identified as experiencing a moderate level of urban heat island impact compared to its surroundings. The figure below shows that the site experiences temperatures in excess of **5.87°C** above the local baseline surface air temperatures due to the urban heat island effect. It is therefore critical that the following mitigation strategies should be priorities in the development:

- Site greening through on-grade canopy cover and rooftop landscaping,
- High solar reflectance finishes,
- Precinct reflectivity studies,
- Passive shading and solar photovoltaic systems.

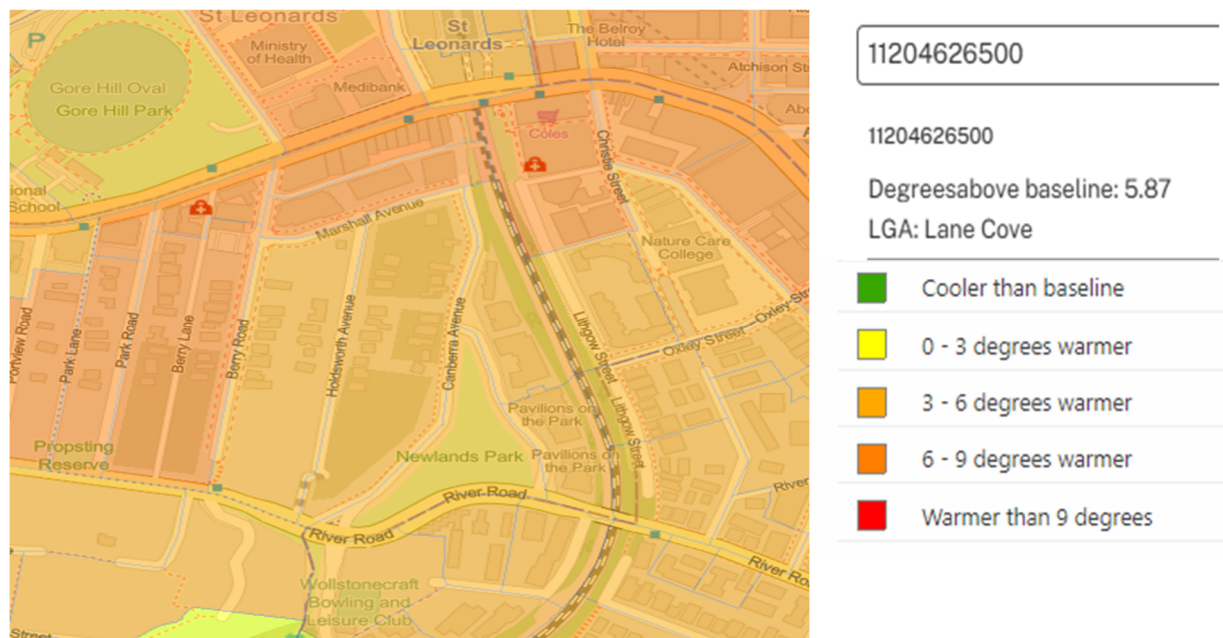


Figure 4: Urban Heat Island Effect, SEED Database.

3.4 MATERIALS

In line with the principals of sustainability outlined in the EPA and the DCP, the project will have a significant focus on the life cycle impacts of material use and responsible procurement. At a high level and subject to further design stages, the use of materials for the development will consider:

Waste Management – Development of an Operational Waste Management Plan to ensure waste can be appropriately sorted, separated, and recycled will also be prioritized assisting the ongoing diversion from landfill for the development. Inclusion of sufficient bins and appropriate separation systems to ensure waste is minimised and effective recycling is enabled.



Circularity – Circularity refers to ‘closing the loop’ of systems and challenging linear approaches to recognise the impacts and opportunities present to increase usability and minimise waste or products and materials. Consideration of the full life cycle of components procured for the proposed development should become a key underlying principle for how all construction materials and products are sourced, used, managed and ultimately retired at end of life. The preparation of a robust decommissioning strategy should be considered for the development, highlighting opportunities for localised reuse and recycling.



Sustainable Certifications & Credentials – Products and materials selected for the project should hold third-party verified environmental declarations (or equivalent certification) to allow for life cycle reporting and quantification of embodied impacts. Products with high recycled content, opportunities for re-use and low embodied emissions will support the sustainable delivery of the development.

Materials such as steel and concrete which inherently have higher embodied carbon, and environmental impact should be the main priority for the development to considerably reduce total impact. Substitutions such as fly-ash and blast-furnace slag should be considered to reduce the embodied carbon of concrete.



Low VOC and Low Formaldehyde Materials – Ensuring paints, adhesives, sealants, floor coverings, carpets and engineered wood are selected appropriately to provide a healthier indoor environment.



FSC/PeFC Timber – All timber, including virgin and engineered timber used during construction (i.e. formwork) and as part of finished elements shall be sourced from certified sustainable forestry or reused. This ensures the timber provided to site is of the highest standard and sourced from renewable suppliers.



3.5 COMFORT & QUALITY

To ensure the best quality for users and visitors inside the space, the following key initiatives will be sought to be provided;

- **Acoustic Excellence** – Deliberate material selection, acoustic attenuation and designing the shape of the building and openings accordingly to achieve acoustic comfort. Sufficient acoustic separation of spaces ensuring acoustic privacy between tenancies.
- **Thermal Comfort** – Appropriate mix of vernacular design, overhangs, high-performance windows, and mechanical systems to deliver the users optimised thermal
- **Lighting Comfort** – Use of high colour rendering index (CRI > 85) LED lighting. Low-glare lighting with baffles or louvres to limit UGR.
- **Landscaping** – Greenery through natural planting throughout assists in a connection to nature for occupants. It also has a cooling effect, reducing the Urban Heat Island Burden on the project.

3.6 MANAGEMENT & SOCIETY

To provide a socially responsible outcome that provides the maximum benefit to both the users and the local area, the following response has been completed:

Head Contractor to follow strict sustainability protocols – As a minimum contract requirement, the head contractor will be required to meet ISO14001 and have a project-specific EMP and EMS in place. This will be maintained throughout the job to ensure the lowest impact to the Environment is achieved and highest quality for the community and workers.

Low GWP & ODP Refrigerants – All refrigerants required across the development must be of low global warming potential (GWP) and ozone depleting potential (ODP). A refrigerant leakage detection system should also be investigated to further minimise the potential emission of harmful chemicals into the environment.

Low Levels of Light Pollution – All external lights are pointed downwards, or designed to strike a hard surface (i.e., awning or wall). This limits light spill into the night sky, assisting with bird migratory patterns and wasted energy

3.7 BASIX COMMITMENTS

BASIX is a legislative requirement for all residential dwelling types within NSW. It sets water and greenhouse gas reduction targets relative to the NSW average benchmark for per person potable water consumption & greenhouse gas emissions within the residential sector. BASIX also sets the minimum performance levels for thermal comfort (through NatHERS modelling) of each dwelling.

This proposal will achieve the following BASIX targets, through the initiatives detailed in Sections 3.1 and 3.2.

The residential components of the development must adhere to the following Energy, Water & Thermal Comfort targets;

- **Energy 63%**
- **Water 40%**
- **Thermal Comfort:**
 - **7.2 Star NatHERS Average**
 - **6 Star NatHERS Minimum**

Additionally, as of October 2023, BASIX requires developments to quantify and report on the embodied emissions of associated materials and construction typologies used.

Refer to the BASIX report and certificate prepared as part of this development application for further detail.

4 CONCLUSION

This report summarises the sustainability targets and commitments for the proposed development at 12-20 Berry Road & 11-19 Holdsworth Avenue, St Leonards. The recommendations and proposed initiatives outlined in this report will be investigated and subjected to further detailed design coordination to ensure the development achieves the requirements of the governing ESD frameworks and policies including;

- NSW Environmental Planning and Assessment (EPA) Regulation 2021
- National Construction Code (NCC) 2022 Volume 1, Section J
- State Environmental Planning Policy (SEPP), Sustainable Buildings, 2022
- NSW Department of Planning, Industry and Environment (DPIE), Net Zero Plan 2020-2030.
- The Lane Cove Development Control Plan (DCP), 2012.
- The Lane Cove Local Strategic Planning Statement

In response to the above, the ESD initiatives and commitments which will be implemented for the development **Net Zero Operational Carbon ready** by 2035 in line with the NSW commitment to reduce fossil fuel dependence.

- **Renewable Energy Procurement** equivalent to Net Zero Emissions for all building energy demands.
- **Compliance** with increased **BASIX Energy, Water and Thermal Comfort** targets including:
 - **Energy 63%**
 - **Water 40%**
 - **Thermal Comfort:**
 - **7.2 Star** NatHERS Average
 - **6 Star** NatHERS Minimum

Embedding a range of sustainability initiatives across the development as outlined in Section 3.

We trust this report provides a detailed overview of the project's commitment to sustainability for the proposed development.

