



Ecologically Sustainable Development (ESD) Report

Sylvania

29 Florida Street, Sylvania

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E-LAB Consulting

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1 EXECUTIVE SUMMARY

This Ecologically Sustainable Development (ESD) has been prepared by E-LAB Consulting as part of the Environmental Impact Statement (EIS) for a State Significant Development Application (SSD-83258708) for proposed residential development at 29 Florida Street, Sylvania.

The site is located at 29 Florida Street, Sylvania in the Sutherland Local Government Area (LGA) and comprises 14 lots with a combined site area of approximately 21,792sqm. It is currently occupied with two storey terrace buildings and 3-4 storey apartment buildings containing 83 social housing dwellings.

The SSD application seeks approval for demolition of all existing structures and construction of eight residential buildings across the Site comprising a total of 484 dwellings, including 159 social housing dwellings.

As part of its commitment to sustainability, the development has committed to the following:

- Achieving the BASIX benchmarks in line with State Environmental Planning Policy - Sustainable Buildings (SEPP) 2022 requirements for mid/high-rise residential building:
 - **BASIX Energy 61%**
 - **BASIX Water 40%**
- Fossil-fuel free design to allow for carbon neutrality.
- On-site renewable energy generation through spatial provision for rooftop solar photovoltaics (PV)
- Following a range of sustainability initiatives across the site spanning energy efficiency, water efficiency, indoor environment quality, waste management and comfort
- Implementing mitigation strategies in response to climate change and the Urban Heat Island Effect.

The strategies and initiatives presented in this report demonstrate a strong commitment to sustainability in line with industry best-practice and SEARS requirements and are to be further developed during subsequent stages of the project.

2 INTRODUCTION

This This Ecologically Sustainable Development (ESD) has been prepared by E-LAB Consulting as part of the Environmental Impact Statement (EIS) for a State Significant Development Application (SSDA) for proposed residential development at 29 Florida Street, Sylvania.

The proposed development includes site preparation works, tree removal and demolition of all structures, and the construction of eight (8) residential buildings up to nine (9) storeys across the site, including basement parking, construction of a new access street, associated landscaping and public domain works, and infrastructure servicing.

A detailed description of the project is included in the EIS.

2.1 SITE OVERVIEW

The Site is located at 29 Florida Street, Sylvania. The site comprises 14 lots and has a total combined site area of 21,792sqm and is legally described as Lot X DP411212, Y DP411212, Lots 2-9 & Lots 10-13 DP22661, Lot 104 DP 733063.

The Site falls within the block bounded by the Princes Highway to the north, Port Hacking Road to the west, Pembroke Street to the south and Florida Street to the east. The Site has access from Florida Street via an internal roadway (Coral Tree Place).

The Site comprises the majority of the street block, except for properties located directly to the north and west at the corner of Florida Street and Princes Highway. This land comprises a car dealership and adjacent vacant land, a dwelling house on Florida Street, and a telecommunications facility zoned SP2 Infrastructure.

The Site is currently occupied with two storey terrace buildings and 3-4 storey apartment buildings containing 83 social housing dwellings.

To the west of the Site is Southgate Shopping Centre providing access to a wide range of retail and services. To the south and east the Site is surrounded by low density residential areas within the wider suburb of Sylvania. To the north across Princes Highway are commercial uses including retail shops, childcare and a car dealer.



Figure 1 Site Location (Source: Google Maps)

2.2 DEVELOPMENT OVERVIEW

The site is located at 29 Florida Street, Sylvania in the Sutherland Local Government Area (LGA). The proposed development includes site preparation works, tree removal and demolition of all structures, and the construction of eight (8) residential buildings up to nine (9) storeys across the site, including basement parking, construction of a new access street, associated landscaping and public domain works, and infrastructure servicing.

A detailed description of the project is included in the EIS.

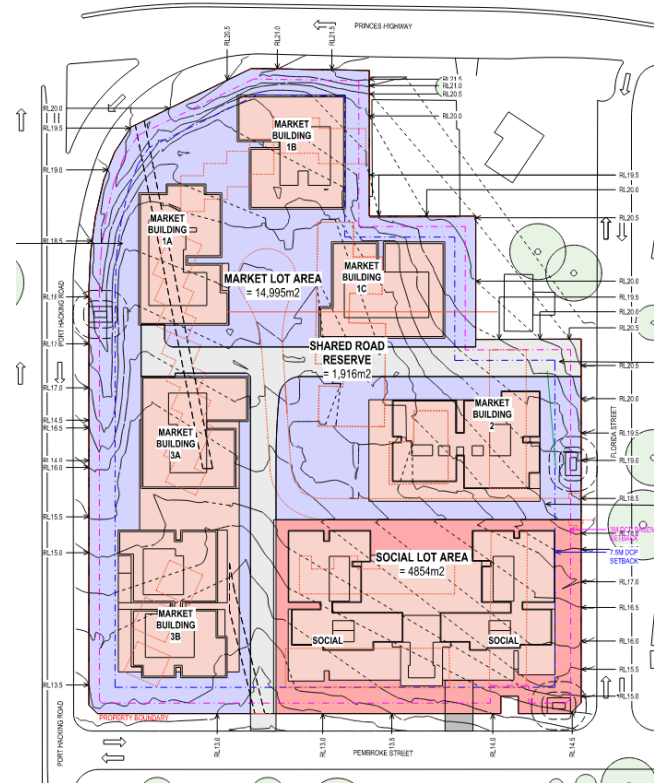


Figure 2 Aerial View of the site (Source: BVN Architecture)

3 SUSTAINABILITY FRAMEWORKS

The Sylvania development’s sustainability outcomes are influenced & aligned by the following key frameworks:

- Secretary’s Environmental Assessment Requirements (SEARS) issued for the development
- NSW Environmental Planning and Assessment (EPA) Regulation 2000
- State Environmental Planning Policy (SEPP) 2022 – Sustainable Buildings
- Sutherland Shire Local Environmental Plan 2015 (SSLEP 2015)
- National Construction Code (NCC) 2022 – Section J Energy Efficiency

3.1 RESPONSE TO SEARS

The Report has been prepared to address the Secretary’s Environmental Assessment Requirements (SEARs) issued for the project (SSD-83258708) on 2 May 2025 as detailed in the table below.

Table 1 SEARS Response

SEARS Requirement	Project Response
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.	See Section 4
Where relevant, provide an assessment of the development against the standards for non-residential development set out in Chapter 3 of State Environmental Planning Policy (Sustainable Buildings) 2022.	Not Relevant, this development is a full residential development, so non-residential elements do not apply



3.2 EPA PRINCIPLES

The Sylvania development will embed ecologically sustainable design principles throughout the design, construction, and operation of the development. The principles to which the development should generally adhere to are defined within Clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. These include:

Table 2 EPA Principles

ESD Principles	Project Response
(a) The precautionary principle, namely, 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. In the application of the precautionary principle, public and private decisions should be guided by— i. careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and ii. 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. 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.
(b) Inter-generational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,	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 Section 4.
(c) Conservation of biological diversity and ecological integrity, namely, that 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 biological diversity, while also managing stormwater runoff from the site to minimise onset impacts. Refer Section 4.3.

(d) **Improved valuation, pricing and incentive mechanisms**, namely, that environmental factors should be included in the valuation of assets and services, such as—

- i. polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,
- ii. 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,
- iii. environmental goals, having been established, should be pursued in the most cost-effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems

The project is committed to achieving a high construction waste diversion target of 90% 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.

3.3 STATE ENVIRONMENTAL PLANNING POLICY (SEPP) SUSTAINABLE BUILDINGS 2022

NSW has whole-of-economy targets to reduce greenhouse gas emissions by 50 per cent by 2030 compared to 2005 levels, and net zero emissions by 2050. Achieving these targets will require all new and existing buildings in NSW to be operating at net zero well before 2050. Energy efficiency, conserving potable water and improving thermal performance are also high priorities.

The NSW Government has introduced the State Environmental Planning Policy (Sustainable Buildings) 2022 to ensure new and renovated buildings are sustainable and resilient for future climate and bring NSW towards net zero emissions. This policy covers each component of the proposed development.

3.3.1 NSW Residential Buildings

The Building Sustainability Index (BASIX) is a legislative requirement for all residential dwelling types within NSW to assess the potential performance of certain residential buildings against a range of sustainability indices including thermal comfort, water, embodied emission and energy.

BASIX 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. It also sets the minimum performance levels for thermal comfort of the dwelling and the embodied carbon emissions that are attributable to building materials.

The new targets are sets into place from October 2023 that increased the standards according to the State Environmental Planning Policy – Sustainable Buildings (SEPP) 2022.

The residential component of this project is committed to meet requirements in line with the State Environmental Planning Policy – Sustainable Buildings (SEPP) 2022 at the time of delivery:

Table 3 BASIX Targets Under SEPP 2022

Benchmark	REQUIREMENT
Energy Benchmark	Required to achieve 61% reduction in energy consumption of whole development through energy efficient design.
Water Benchmark	Required to achieve 40% reduction in water consumption of whole development through water efficient design.
Thermal Performance	Meet Thermal Comfort benchmarks.
Materials Index	Required to estimate the volume of different materials used in the construction and applying the emissions factors for the materials.

Please refer to the BASIX Report submitted with this application for further details on BASIX compliance.



3.4 Sutherland Shire Local Environmental Plan 2015 (SSLEP 2015)

The proposal at 29 Florida Street, Sylvania demonstrates a clear and consistent alignment with the environmental protection and sustainability objectives of the Sutherland Shire LEP 2015. The table below outlines how the development satisfies the relevant LEP sustainability-related clauses

Planning Control	Sustainability Requirement / Intent	Project Response
<i>LEP Clause 6.1 – Acid Sulfate Soils</i>	Prevent disturbance or mobilisation of acid sulfate soils; protect water quality.	Excavation is shallow and controlled, avoiding any disturbance of acid sulfate soils. If encountered, appropriate management protocols will be followed to prevent environmental impact.
<i>LEP Clause 6.2 – Earthworks</i>	Minimise adverse impacts on drainage, soil stability, adjoining properties and the environment.	Earthworks are modest and stabilised with erosion controls. Natural drainage is maintained where possible and protected through compliant sediment control measures.
<i>LEP Clause 6.3 – Flood Planning</i>	Ensure development is compatible with flood conditions and safe for occupants.	Appropriate finished floor levels and onsite drainage measures ensure flood resilience and avoid adverse impacts to neighbouring properties.
<i>LEP Clause 6.5 – Foreshore & Watercourse Protection</i>	Protect waterways, foreshore environments, riparian vegetation and water quality.	The development does not disturb natural watercourses. Landscaping and stormwater filtration help prevent sediment and nutrient runoff into downstream systems.
<i>LEP Clause 6.6 – Riparian Land & Watercourses</i>	Prevent pollution, erosion and hydrological disruption.	WSUD strategies, permeable surfaces and controlled drainage preserve hydrological function and protect downstream ecology.
<i>LEP Clause 6.7 – Landscaped Areas (Residential Zones)</i>	Improve biodiversity, shading, and residential amenity through appropriate landscaping.	Deep soil areas, native planting and canopy trees strengthen biodiversity, provide shading and contribute to improved microclimate conditions.
<i>LEP Clause 7.1 & 7.2 – Biodiversity Protection</i>	Avoid ecological impacts and protect habitat values.	No mapped ecological constraints are impacted. Landscaping reinforces biodiversity and enhances local habitat potential.
<i>LEP Clause 7.3 – Watercourse Overlay</i>	Maintain water quality and protect aquatic ecosystems.	The stormwater system incorporates filtration, detention and controlled discharge to protect downstream water quality.
<i>DCP – Energy Efficiency & Thermal Comfort</i>	Encourage passive design, reduced energy demand and high-performance envelopes.	The design maximises natural ventilation, shading and thermal performance through high-performance glazing and passive heating/cooling strategies, reducing reliance on mechanical systems.



4 SUSTAINABLE DESIGN RESPONSE

4.1 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 3.

4.2 ENERGY CONSUMPTION

The energy efficiency strategy generally follows the energy efficiency pyramid of the design below. In the first instance demand for Greenhouse Gasses should be reduced. Consideration should be to remove the need for energy to be consumed where possible. Beyond this, energy can be more efficient, through efficient lighting, mechanical systems and appropriate services.

Once the system has reduced all available energy-consuming elements and made the remaining systems as efficient as possible, renewable energy sources will be considered. If space allows on the roof, PV will be installed. Only after all of the above major steps have been completed should offsets be used to close the gap and achieve neutrality.

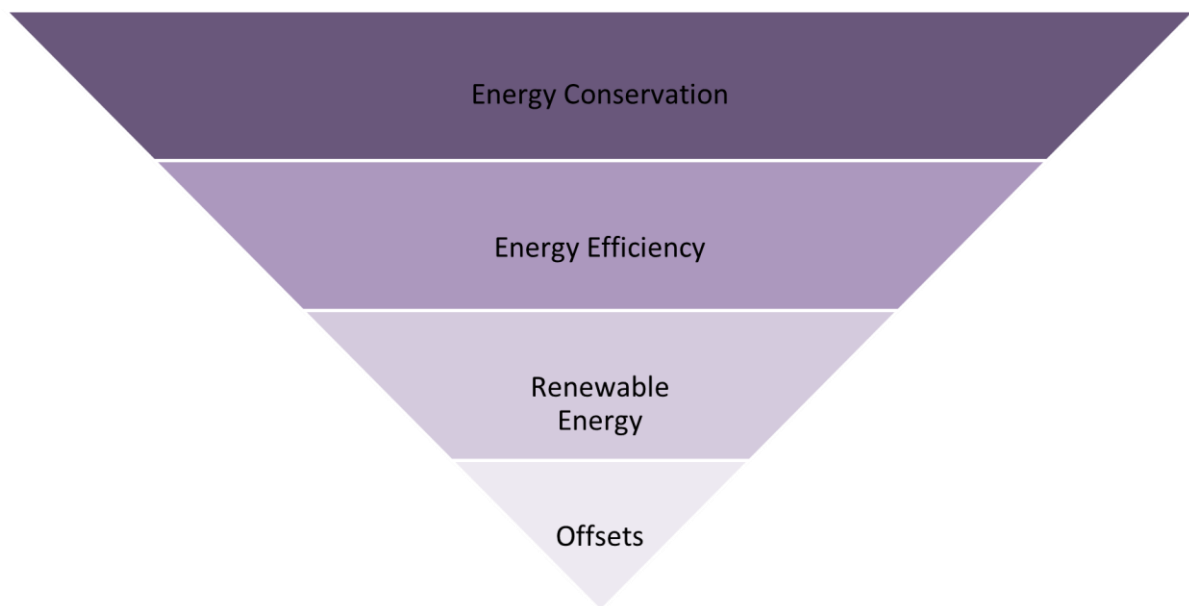
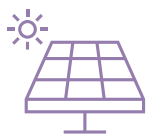


Figure 2 Hierarchy of Design - Energy Efficiency

To achieve the above, the following initiatives are proposed:



Renewable Energy – The roof area provides an excellent opportunity for installation of a solar photovoltaic system. The sizeable system will generate renewable electricity to offset grid use and minimise stress on the grid at peak times. PV will be installed at a rate that maximises the coverage of the non-trafficable roof area. The detailed design specifications and final placement of the photovoltaic panels will be confirmed prior to the commencement of construction. This approach is considered standard and acceptable at this stage of the project lifecycle, particularly for developments of this scale and complexity.



Full Electrification – The building has been designed to omit the use of fossil fuel derived energy sources on-site such as gas for DHW and heating to enable operational net zero carbon emissions.



Efficient Lighting Systems – High efficiency LED lighting throughout, including in common areas and with efficiency controls. Controls will include motion sensors, time clocks and zoned switching which will help reduce consumption of energy.



Controls, Energy Metering and Monitoring – Energy meters and monitoring systems will be provided to comply with NCC 2022 Section J Part J8 and NABERS sub-metering, validation and coverage requirements.



Facade – Envelope – The balance between daylight access and solar heat gains will be a priority of the design team to ensure occupant comfort and energy performance are maximized. The proposed performance of glazed elements will be subject to ongoing design considerations and BASIX modelling. Proper sealing of the envelope through leading construction practices and verification methods will also be considered to ensure undesirable bulk-air flow is minimized.



Hot Water – Hot water should be provided by energy efficient heat pump systems. These systems are highly efficient which will allow occupants to utilise systems often with reduced energy consumption.



Appliances & Equipment – Apartment appliances and equipment will be selected with high energy rating to ensure reduced consumption which will be in line with BASIX energy targets requirements.

Additionally, site will be fully electric with no gas combustion for ovens and cooktops allowing for operational net zero.

4.3 WATER CONSUMPTION

To achieve responsible water consumption and water sensitive urban design, best-practice water-saving initiatives will need to be implemented throughout the project. The development's design is deliberately working to reduce potable water consumption in the first instance by reducing water use.

The following initiatives will be explored to achieve the potable water targets:

Sanitary Fixtures – By implementing low-flow water fixtures throughout the development, the consumption will be significantly reduced. All sanitary fixtures are to be provided with the minimum WELS ratings identified below:

Taps – 5 Star WELS

Toilets – 4 Star WELS

Showers – 4 Star WELS (>6 but ≤ 7.5 L/min)

Refer to the BASIX report for further details on residential water consumption measures.

Rainwater – The development will provide a rainwater storage tank with reuse supplied to landscape irrigation, reducing reliance on mains supply water. Final sizing of the tank and detail regarding collection considering the catchment area, expected demand and pumping infrastructure is to be refined during detailed design stages.

Landscape Irrigation – Efficient irrigation systems will be considered, including underground surface drip systems, moisture sensors, and the use of native plants in the landscaping plan. 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, helping to mitigate climate change. The project is targeting a 70% native planting palette.

WSUD & Stormwater Management – Stormwater quality (pollutant loading) and volume discharged from site are key considerations in future design stages to ensure the development has minimal environmental impact on local waterways and ecology compared to the pre-development baseline.



4.4 MATERIALS

In line with the principals of sustainability outlined in the EPA, the project will have a significant focus on materiality. The scope of consideration includes the following action items within the project response:

- **Construction Waste** – Set a target for a minimum of 90% construction and demolition waste is to be diverted from landfill. This diverts and ensures reuse or recycling of a high portion of site waste.
- **Low VOC and Low Formaldehyde Materials** – paints, adhesives, sealants, floor coverings, carpets and engineered wood will be selected appropriately to provide a healthier and low-impact environment. Such efforts provide a cleaner and better environment for all. Additionally, the project will aim to utilise ultra-low VOC paints.
- **Best-Practice PVC** – cables, pipes, flooring, and blinds will be selected and specified to be Best Practice PVC. This ensures upstream performance will be met and has significant benefit for the overall environment during the construction process.

- **Best Practice Steel** – Where possible, steel will come from a sustainable steel manufacturer, who has an action plan. Steel supplied will aim to have energy reducing processes in manufacturing and recycled content.
- **Sustainable Products** – Where possible, products selected for the project will be sustainable which are verified through recycled content, re-use, environmental product declarations, certifications and more. This will ensure reduced toxicity and improve environmental quality while reducing waste.

4.5 COMFORT AND QUALITY

To ensure the best quality for occupants and visitors inside the space, the following key initiatives will be committed to by the principal:

- **Visual Comfort** – Maximising high-quality light into the living spaces, with high amenity views.
- **Indoor Air Quality** – Ventilation to be easily cleaned and elimination of pollutants to improve air quality within internal spaces.
- **Acoustic Excellence** – Designing the building layout to be protected from noise from external sources. Delicate material selection, acoustic attenuation, and designing the shape of the building and openings accordingly achieves the performance. High-performance glazing specifications will be implemented to further manage street-level noise emissions.
- **Thermal Comfort** – Appropriate mix of vernacular design, overhangs, adaptive comfort and high levels of insulation in the roof and facades.
- **Lighting Comfort** – Use of high colour rendering index (CRI > 85) LED lighting throughout the entire development. Low-glare lighting with baffles or louvres to limit glare.
- **Biophilic Design** – Natural elements that reflect the context of the site and acts as a connection to nature for occupants.
- **Accessibility** – Ensure that the building is accessible to people of all abilities, in accordance with AS 1428, with features such as ramps.
- **Safety and Security** – Prioritise building safety and security measures to provide a sense of comfort and protection for occupants.
- **Natural Materials** – Where practical, use natural and sustainable building materials that are non-toxic and promote a healthy indoor environment.

The above combine to ensure the development is responsible, efficient, beautiful, and in the best interest of not just the developers, but the residents as well.

4.6 SUSTAINABLE TRANSPORT

The adoption of sustainable transport methods is encouraged by building designs that provide appropriate facilities for occupants and visitors. Proximity to local transport routes and walkable neighbourhood infrastructure supports reduced reliance on private vehicles and promotes more sustainable travel choices.

The development at 29 Florida Street, Sylvania is well positioned within an established residential area with convenient access to public transport, pedestrian networks and local amenities. These attributes support occupants in adopting and utilising sustainable transport options. The development incorporates the following measures:

- **Bicycle Parking Facilities:** Secure and convenient bicycle parking is provided for residents, supporting active transport and reducing short local vehicle trips.
- **Enhanced Pedestrian Access:** The site benefits from walkable connections to nearby bus services along Princes Highway and Port Hacking Road, local shops, parks and community facilities, encouraging walking as a primary local transport mode.



- **Support for Public Transport Use:** The location provides ready access to existing bus routes that link Sylvania with nearby centres including Miranda, Sutherland and Hurstville, reducing the need for private car travel.

4.7 HEAT ISLAND MITIGATION

The proposed development should undertake a risk assessment of the potential impacts of climate change (such as flooding, extended periods of high temperature, rising utility infrastructure costs etc.) and include adaptive design responses which specifically address identified risks deemed to be of high or extreme significance. Doing so will improve the development's ability to respond to the impacts of climate change and improve operational resiliency.

The site is identified as experiencing a moderate–high level of urban heat island impact compared to its surroundings. The site's baseline heatwave temperature experiences peaks approximately 7.0 °C above the baseline, as defined by the NSW government for Urban Heat Island Effect (<https://www.seed.nsw.gov.au/>).

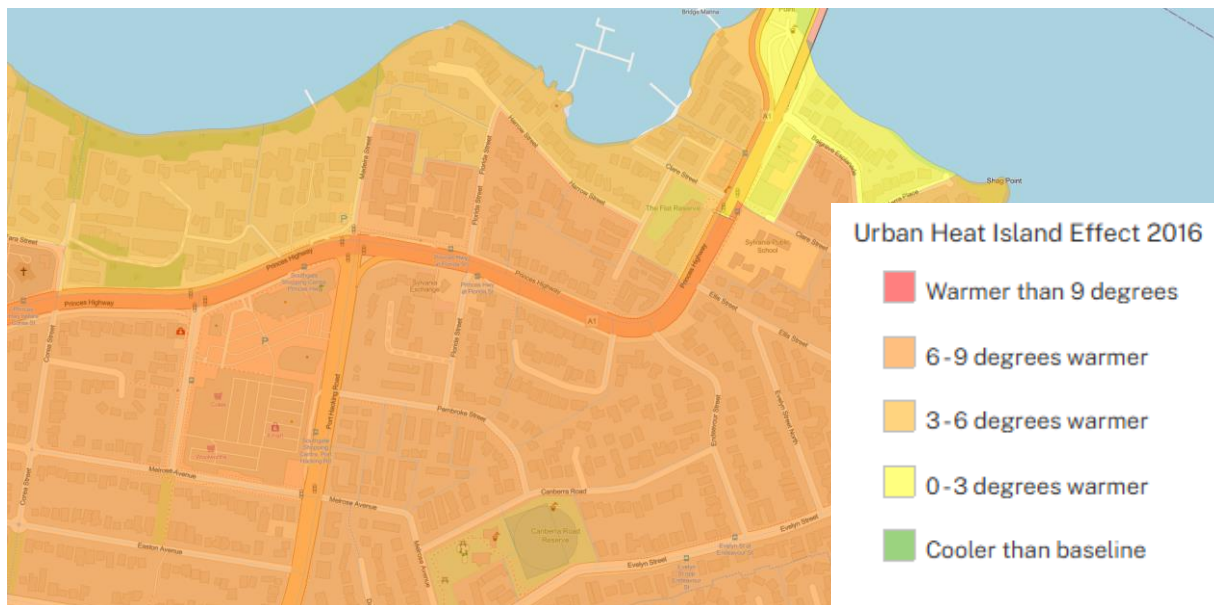


Figure 3: Urban Heat Island Effect at the site (Source: SEED Database, 2016)

To minimise the urban heat island effect and provide a more comfortable environment for occupants, the development can implement the following initiatives:

- Retention and additional planting of trees providing tree canopy.
- Outdoor communal spaces with landscaping, gardens and lawns to provide additional vegetation.
- Light coloured materials selected for roofs and facades where possible.
- Introduction of architectural elements and shading where possible.

4.8 NSW NET ZERO GOAL

The development is actively aiming to adhere to the Government's goal of net zero emissions by 2050 through a range of strategies discussed above. 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.

Following this structure the development will incorporate a range of strategies to minimise greenhouse gas emissions which involves:

- Elimination of gas combustion on site allowing the development to be fully electric. This will allow the development to be net zero ready for when the grid transitions or potential to run fully on renewable energy in the near future.
- HVAC systems to be considered with low impact refrigerant plants and equipment to reduce emissions to the atmosphere.
- Energy consumption reduction through passive design elements. These include architectural shading and projection elements allowing shading and reduced heat transfer through glazing, cross-ventilation introduced for natural cooling and additionally, naturally ventilated corridors and circulation spaces to reduce the need for mechanical ventilation and air-conditioning.
- High performing façade designs involving bespoke glazing and insulation selection allowing for apartments to be average 7 Star NatHERS rated which in turn reduces energy consumed for heating and cooling of spaces.
- Efficient lighting systems and selections will reduce the consumption of energy through time clocks, zone switching, occupant sensor and more. Additional BMS controls for metering and monitoring will allow for active consumption monitoring allowing the development to adapt and implement strategies to reduce energy consumption during operation.

Renewable energy systems will be provided where feasible and will be coordinated with services design.



5 SUMMARY

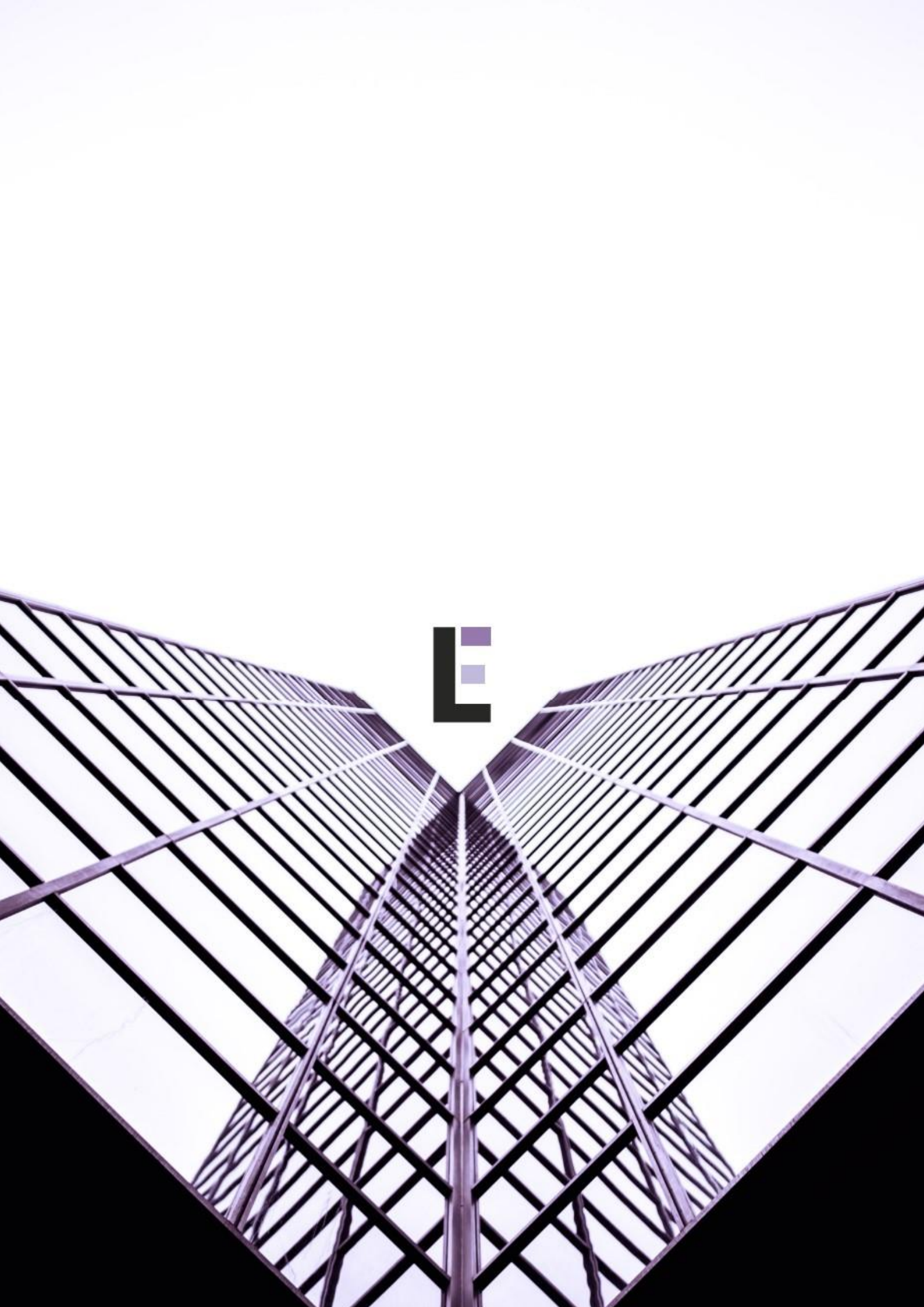
This report summarises the sustainability targets and commitments for the new proposed a residential development located at 29 Florida Street, Sylvania 2224. The requirements for sustainability have been coordinated with the design team to allow the development to achieve a high level of sustainable practice across the entire development.

As part of its commitment to sustainability, the development has committed to the following:

- Achieving the BASIX benchmarks in line with the State Environmental Planning Policy – Sustainable Buildings (SEPP) 2022 requirements for mid/high-rise residential building:
 - **BASIX Energy 61%**
 - **BASIX Water 40%**
- Fossil-fuel free design to allow for carbon neutrality.
- On-site renewable energy generation through spatial provision for rooftop solar photovoltaics (PV)
- Following a range of sustainability initiatives across the site spanning **energy efficiency, water efficiency, indoor environment quality, waste management and comfort.**
- Provision of Heat Island Mitigation measures

The strategies and initiatives presented in this report demonstrate the project’s commitment to sustainability in line with industry best-practice and are to be further developed during subsequent stages of the project and confirmed before a Construction Certificate is issued.





E