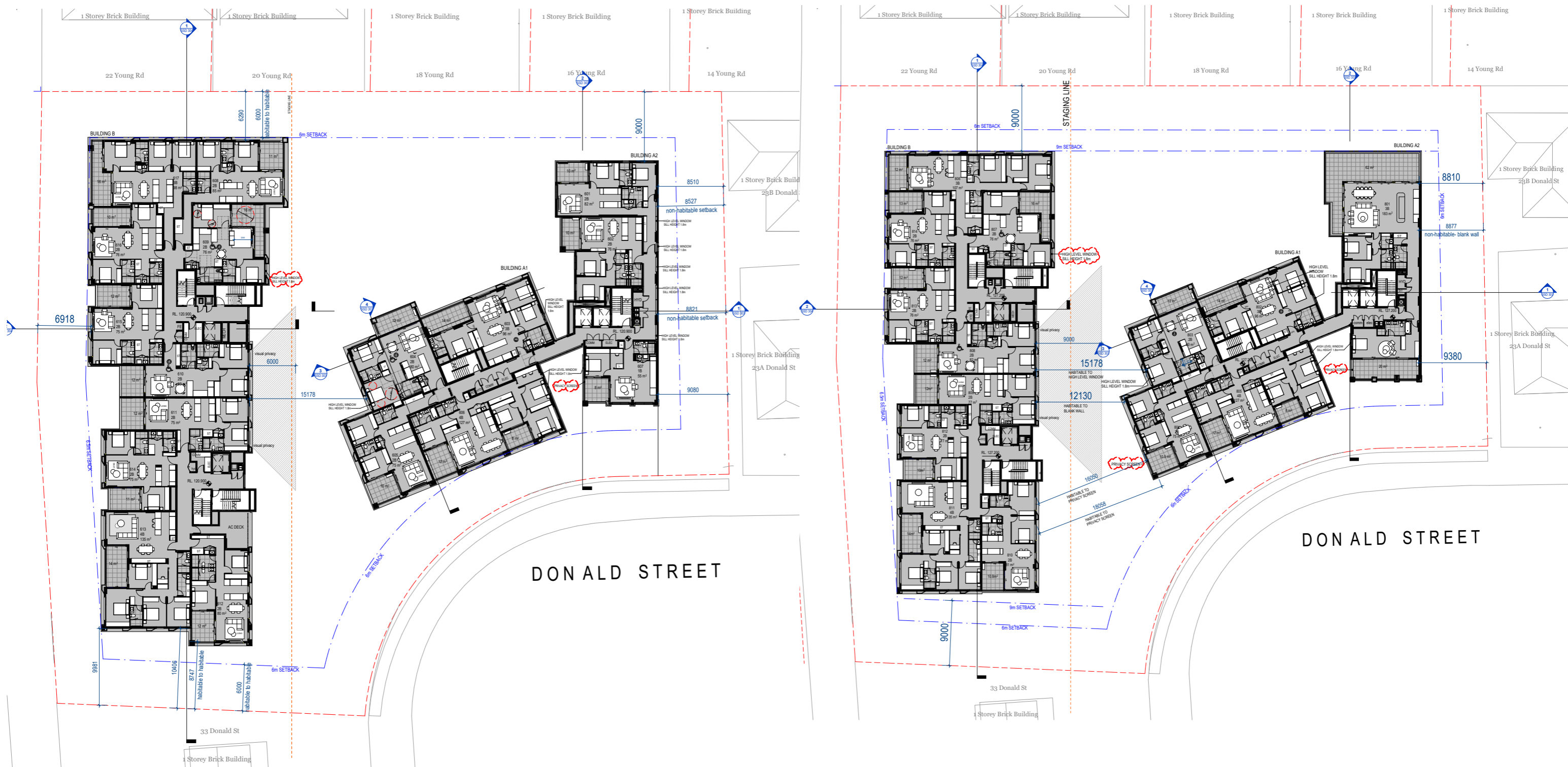


6.0 ARCHITECTURAL DRAWINGS



DESIGN VERIFICATION STATEMENT

15a - 15b Moseley Street & 25 - 29 Donald Street, Carlingford, NSW 2118

Persuant to Clause 29 of the Environmental Planning and Assessment Regulation 2021, Capio Property Group hereby declares that the Group has in full-time employment, and employee who is a person registered as an architect in accordance with the Architects Act 2003.

Capio Property Group have reviewed the proposed residential development project for the site above, and to the best of their information and knowledge, the architectural documentation prepared for this State Significant Development Application achieves the Design Quality Principles in Schedule 9 of SEPP (Housing) 2021, and the objectives in Parts 3 and 4 of the Apartment Design Guide.

Further details on how the objectives are addressed is provided in the Design Principles Statement and ADG Compliance Table, are found in this Design Report.

CAPIO Property Group

Nominated Architect:



Vikas Gupta
Architect Registration No. NSW - 11494

7.0 CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN

Safety and security principles

The design of buildings and associated public and communal spaces have been considered by observing the principles outlined in the NSW Police Service's 'Crime Prevention Through Environmental Design' (CPTED), to deter opportunities for criminal behaviour and to make a safer place for the community. Means of achieving these objectives and meeting the prescribed principles are outline below:

7.1 Surveillance

Placing people, activities and physical features in ways that maximises the ability to see what is happening in an area discourages anti-social behaviour, as perpetrators do not want to be seen.

Clear sightlines between public and private places.

The private spaces of the proposed development, particularly the apartments, have clear sightlines with the street and public domain areas. Balconies and windows to habitable rooms face the street. This will promote casual surveillance and minimise crime risk.

Effective lighting of public places.

The proposal will include appropriate lighting at street level and in all public areas of the building as well as the communal areas to mitigate crime and provide maximum safety.

Landscaping that makes places attractive, but does not provide offenders with a place to hide or entrap victims.

The proposal includes a communal landscaped areas on ground level only. The design of the building and the landscaped spaces has been focused to create attractive areas with high amenity and to ensure that casual surveillance provides a safe environment through clear sightlines.

7.2 Access control

The use of fences, security devices and locks to restrict access, increases the effort required to commit an offence and therefore reduces the potential for it to happen. Safety and security principles.

Clear sightlines between public and private places.

The public and private domain areas that surround the site at ground level are designed to guide pedestrians around the site. The proposal does not contain any 'stray' paths.

Effective lighting of public places.

The communal areas will encourage people into the spaces and will provide good amenity with good casual surveillance. This will be achieved through attractive landscaping and clear sightlines from private spaces to promote passive surveillance.

Landscaping that makes places attractive, but does not provide offenders with a place to hide or entrap victims.

Appropriate physical barriers will be put in place to all entrances of the building and site. The carpark will be provided with panel lift door for security. The lobby will be accessible only to residents through the use of a secured access system like swipe cards.

7.3 Ownership

Areas that are well protected and look as if they are owned and cared for, gives an impression that it is harder to conduct anti- social behaviour. Cared for areas also reduce the level of fear within the community.

Design that encourages people to gather in public space and to feel some responsibility for its use and condition.

The building's interface with the existing streets will encourage people to the area and will have well finished materials and landscaping that will enhance the street edge. The environment will instil civic pride in residents. This will promote a sense of ownership.

Design with clear transitions and boundaries between public and private space.

All areas at ground level will have clear delineation between public and private space through the use of level differences, doors and glazed frontages. The development has been designed to communicate effective space management.

7.4 Maintenance

Spaces that are well maintained and where any evidence of anti-social behaviour is promptly removed, reduces levels of satisfaction for those performing anti-social activities and reduces fear in the community.

Space management strategies include:

- *Activity coordination;*
- *Site cleanliness;*
- *Rapid repair of vandalism and graffiti;*
- *The replacement of burned-out pedestrian and car*
- *Street lighting; and*
- *The removal or refurbishment of decayed physical elements*

The communal and public areas of the site provide for various types of activities with good casual surveillance;

The site will be maintained by various contractors who will form part of the building management regime set up by the owner's association.

Design Controls for Residential Flat Buildings

The following design principles adhere to the prescribed 'Privacy and Security' section of Residential flat buildings and Mixed-use development as outlined in Part 3 and Part 4 of Parramatta's Control Plan 2023. The proposed development meets the objectives of the DCP through specific design elements.

Natural Surveillance

Objectives

- *To encourage natural surveillance from and to surrounding land uses*
- *To encourage natural surveillance by encouraging legitimate land use*
- *To provide clear sightlines for pedestrian movement*

Suitable visibility is provided to high risk areas, such as entries and stairs. The Lobby to the building is clearly located along Moseley Street and Donald Street providing for a consistent identification of entries;

Paths around the buildings are designed to provide for clear sightlines;

Natural surveillance is maximised through the use of permeable building materials where required, without compromising privacy to private spaces

Landscaping

Objectives

- Create aesthetically pleasing but safe environments
- Create easy to maintain and vandal resistant areas
- Reinforce natural surveillance and sightlines

The design of the landscaped areas:

Provide graded planting for increased visibility through open spaces;

Use plant selection and locate planting to deter short cuts to restricted areas;

Level differences, balustrades and fencing and planting are used where appropriate to separate publicly accessible and communal / plant space;

The design of landscaped areas has considered the following issues:

Deter Anti social behaviour, eg, graffiti;

Promoting natural surveillance;

Selection of plants for increased survival and growth rates

Land Use

Objectives

- To promote natural surveillance and minimize illegitimate activities
- To create a mix of activities which will result in greater level of natural surveillance around the clock

A range of amenity uses is proposed, through the provision of the surrounding streets, to support day-night activities and to encourage longer passive surveillance hours.

The proposed scale and range of uses is appropriate for the future character of the Precinct.

Building Design

Objectives

- To integrate public buildings with public space
- To use buildings to support natural surveillance
- To reduce vandalism and graffiti
- To reduce safety problems

The design of the building, has been developed to:

Ensure that all entrances and exits are clearly visible from the street and are secured.

Minimise design features that create entrapment spaces;

Minimise blank external walls;

Ensure that landscaping has been designed for intended uses and planting does not allow for anti-social behaviour, e.g., by providing hiding spaces;

Ensure that building envelope addresses the street frontage:

All public spaces are over-looked by apartments to promote natural surveillance.

Lighting

Objectives

- To provide appropriate lighting for activities after dark
- To encourage the use of appropriate light fixtures
- To encourage the appropriate location of lighting

D3- High walls which obstruct surveillance are not permitted.

D4- The front door of a residential flat building shall be visible from the street.

Signage

Objectives

- To provide clear and readily available signage
- To provide signage in appropriate locations

Windows and balconies are oriented towards public spaces to promote passive surveillance to pedestrian areas and building entries

Mailboxes are located next to the residential entry for increased security and to reduce the risk of vandalism and theft;

Security lighting will be installed throughout the building and maintained by Strata under a maintenance agreement.

All lighting will be designed to meet relevant Australian Standards, including AS1158, AS1680 and AS2890;

Lighting design will take into consideration the location and the use of individual spaces to allow for good visibility and to minimise shadows;

A variety of lighting sources will be provided to provide varied lighting to work with the building and landscape design whilst providing appropriate lighting levels;

Selection of lighting fixtures will take into account the life cycle and efficiency of light fittings

Surveillance and signage will not be obstructed by landscaping or built structures.

Graded planting will be provided to increase visibility through open spaces;

Suitable visibility is provided to high risk areas, such as entries and stairs.

The residential lobbies have a minor indentation on the ground floor to be clearly located along Moseley Street and Donald Street providing for a consistent identification of entries;

Proposed paths around the buildings are designed to provide for clear sightlines;

Clear and accessible signage will be provided throughout the development to assist in way-finding;

The future design of signage will take into account:

Providing sufficient information for residents and visitors for wayfinding and to identify available services and amenities across the site as well as building entries;

Sufficient illumination is provided;

High visibility locations;

Safe routes are identified;

Legibility;

Sufficient lighting is provided;

Signs are not obstructed by landscaping or built structures;

Incorporation of Braille where appropriate

Entrapment

Objectives

- *To reduce the risk of attack by hidden persons*
- *To eliminate the possibility of entrapment*
- *To ensure the suitable location of facilities*

The design of the building has been developed to:

Provide clear sightlines in public and communal spaces and through the proposed vehicular and pedestrian links;

Communal, private spaces and carparks will be secured through doors and gates suitable for their use;

Public and communal spaces are designed to have multiple access points to promote permeability through the site.

High risk facilities (eg, communal amenities) have natural surveillance provided by the apartments and commercial units

Maintenance

Objectives

- *To ensure regular maintenance and repairs are undertaken*
- *To discourage graffiti and vandalism*
- *To install features that are vandal resistant*

A maintenance program for all public and communal spaces will be developed to ensure that all spaces will be well maintained. This is consistent with the Safer By Design principles to keep spaces well maintained and to provide a “cared for” environment. Maintained spaces reduce fear in the community and reduces the level of satisfaction for those deliberately performing anti-social activities.

8.0 APARTMENT DESIGN GUIDE COMPLIANCE TABLE

Part 3 - Siting the Development			
	Objective	Proposal	Compliance
3A Site Analysis			
3A-1	Site analysis illustrates that design decisions have been based on opportunities and constraints of the site conditions and their relationship to the surrounding context	The proposed development's key design principles for massing, form and orientation all address the opportunities and constraints of the site with strategic responses to urban views, Parramatta's design principles, public domain activation, solar orientation and strategic views. Refer to architectural plan SSD107	Complies
3B Orientation			
3B-1	Building Types and layouts respond to the streetscape and site while optimising solar access within the development	ADG requirements, orientation and site layout have established the primary building arrangement. Site conditions, occupant amenity (solar, cross-ventilation and privacy), as well as existing and emerging urban contexts have informed the development of the approved massing.	Complies
3B-2	Overshadowing of neighboring properties is minimised during mid winter	Building envelope has been carefully articulated to minimize overshadowing impact on neighbouring properties, during mid winter. Refer to architectural plan SSD702, SSD705-SSD712	Complies
3C Public Domain Interface			
3C-1	Transition between private and public domain is achieved without compromising safety and security	Generous landscaping buffers are provided between public and private spaces. CPTED principles have also been embedded ensuring clear sight lines are maintained, appropriate lighting is provided and activity is supported	Complies
3C-2	Amenity of the public domain is retained and enhanced	The public domain amenity is not impacted.	Complies
3D Communal and Public Open Space			
3D-1	An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping	1,508sqm is provided as communal open space. Raised planted areas with sufficient soil depth for the planting of small to medium trees are incorporated, enhancing residential amenity through substantial landscaping.	Complies
3D-1 (1)	Design Criteria 1: Communal open space has a minimum area equal to 25% of the site.	1,508sqm or 25.3% of the site area is allocated as communal open space. Refer to architectural plan SSD506	Complies
3D-1 (2)	Design Criteria 2: Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9am and 3pm on 21 June (mid winter)	52% of the communal open space achieves a minimum of 2 hours direct sunlight between 9am and 3pm. Refer to architectural plan SSD403	Complies

	Objective	Proposal	Compliance															
3D Communal and Public Open Space																		
3D-2	Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting.	The proposed communal open space provides settings for various active and passive activities. Refer to the landscape architects package of information.	Complies															
3D-3	Communal open space is designed to maximize safety	Refer to the Chapter 7: Crime Prevention Through Environmental Design of this report, which notes the safety measures applied and proposed performance of common areas.	Complies															
3D-4	Public open spaces where provided are responsive to the existing pattern and uses of the neighborhood	There are no public open spaces provided.	Complies															
3E Deep Soil Zones																		
3E-1	Deep soil zones provide areas on the site that allow for and support healthy plant tree growth. They improve residential amenity and promote management of water and air quality.	Deep soil areas are provided to support significant mature trees along the site's interface to Moseley and Donald Street Refer to architectural plan SSD507	Complies															
3E-1 (1)	<p>Design Criteria 1:</p> <p>Deep soil zones are to meet the following minimum requirements:</p> <table border="1"> <thead> <tr> <th>Site Area</th> <th>Min. Dim.</th> <th>Deep soil</th> </tr> </thead> <tbody> <tr> <td>• less than 650 m²</td> <td>-</td> <td>7%</td> </tr> <tr> <td>• 650m² - 1,500 m²</td> <td>3 m</td> <td>7%</td> </tr> <tr> <td>• greater than 1,500 m²</td> <td>6 m</td> <td>7%</td> </tr> <tr> <td>• greater than 1,500 m²</td> <td>6 m</td> <td>7%</td> </tr> </tbody> </table> <p>with significant existing tree cover</p>	Site Area	Min. Dim.	Deep soil	• less than 650 m ²	-	7%	• 650m ² - 1,500 m ²	3 m	7%	• greater than 1,500 m ²	6 m	7%	• greater than 1,500 m ²	6 m	7%	683sqm of deep soil area with minimum dimension of 6m is provided, equivalent to 11.4% of the site area. Refer to architectural plan SSD507	Complies
Site Area	Min. Dim.	Deep soil																
• less than 650 m ²	-	7%																
• 650m ² - 1,500 m ²	3 m	7%																
• greater than 1,500 m ²	6 m	7%																
• greater than 1,500 m ²	6 m	7%																
3F Visual Privacy																		
3F-1	Adequate building separation distances are shared equitably between neighbouring site, to achieve reasonable levels of external and internal visual privacy.	Proposed building separation distances adhere to ADG guidelines.	Complies															

3F-1 (1)	<p>Design Criteria 1:</p> <p>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:</p> <table border="1" data-bbox="537 464 1279 814"> <thead> <tr> <th>Building height</th> <th>Habitable rooms and balconies</th> <th>Non-habitable Rooms</th> </tr> </thead> <tbody> <tr> <td>up to 12 m (4 storeys)</td> <td>6 m</td> <td>3</td> </tr> <tr> <td>up to 25 m (5-8 storeys)</td> <td>9 m</td> <td></td> </tr> <tr> <td>over 25 m (9+storeys)</td> <td>12m</td> <td></td> </tr> </tbody> </table> <p>Note: Separation distances between buildings on the same site should combine required building separations depending on the type of room (see figure 3F.2)</p> <p>Gallery access circulation should be treated as habitable space when measuring privacy separation distances between neighbouring properties.</p>	Building height	Habitable rooms and balconies	Non-habitable Rooms	up to 12 m (4 storeys)	6 m	3	up to 25 m (5-8 storeys)	9 m		over 25 m (9+storeys)	12m		<p>Building separation between Buildings A1 and Building B is 15.18m, measured between habitable-to-habitable rooms.</p> <p>This measurement is taken between openings that have no direct sightlines to each other. Visual privacy mitigation solutions such as high level windows with increased sill heights, oblique angles, etc. are used to protect future resident amenity.</p>	Complies
Building height	Habitable rooms and balconies	Non-habitable Rooms													
up to 12 m (4 storeys)	6 m	3													
up to 25 m (5-8 storeys)	9 m														
over 25 m (9+storeys)	12m														
3F-2	Site and building design elements increase privacy without compromising access to light and air and balance outlook and views from habitable rooms and private open space.	Refer to architectural plan SSD207	Complies												
3G Pedestrian Access and Entries															
3G-1	Building entries and pedestrian access connects to and address the public domain	All building entries are provided with clear sight lines, are publicly accessible and integral to the design's composition, providing activation across the site whilst dispersed enough to allow localised identity.	Complies												
3G-2	Access, entries and pathways are equitable and easy to identify	All entries are clearly legible in the architectural form and are accessible.	Complies												
3G-3	Pedestrian links through developments provide access to streets and connect destinations	All links across the site are accessible to residents only. All links have clear sight lines and led directly to either Moseley Street or Donald Street.	Complies												
3H Vehicle Access															

3H-1	Vehicle access points are designed and located to achieve safety, minimize conflicts between pedestrians and vehicles and create high quality streetscape	The vehicle entry is located at the corner of Donald Street to minimise visual obstruction along the streetscapes and conflicts between pedestrians and vehicles.	Complies
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	Objective	Proposal	Compliance
3J Bicycle and Car Parking			
3J-1	Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas.	Parking is provided as per the Housing SEPP rates. Refer to traffic engineer's report and statement.	Complies
3J-1 (1)	<p>Design Criteria 1:</p> <p>For development in the following locations:</p> <ul style="list-style-type: none"> • on sites that are within 800 m of a railway station or light rail stop in the Sydney Metropolitan Area; or • on land zones, and sites within 400 m of land zoned, B3 Commercial Core, B4 Mixed Use of equivalent in a nominated regional centre <p>the minimum car parking requirement 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.</p> <p>The car parking needs for a development must be provided off street.</p>	Refer to the traffic engineer's report (dated 22 July 2025) and traffic response letter (dated 4 December 2025)	Complies
3J-2	Parking and facilities are provided for other modes of transport	Parking spaces are provided for private residential cars and residential visitors.	Complies
3J-3	Car park design and access is safe and secure	Basement vehicular entry will be by secure gate entry.	Complies
3J-4	Visual and experimental impacts of underground car parking are minimised	Where basement levels rise above the ground plane due to the site topography, built form and landscape have been designed to minimise visual impact and enhance the public and communal domains.	Complies
3J-5	Visual and environmental impacts of on-grade car parking are minimised	All carparking is located under the natural ground level. These levels differ between Buildings A & B due to the site's natural topography.	Complies

3J-6	Visual and environmental impacts of above ground enclosed car parking are minimised	No above-ground car parking is proposed.	Complies
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Part 4 – Designing the Building

	Objective	Proposal	Compliance
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4A Solar and Daylight Access

4A-1	To optimize the number of apartments receiving sunlight to habitable rooms, primary windows and private open space	Buildings on the site are oriented to maximise sunlight to apartments.	Complies
4A-1 (1)	Design Criteria 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 9am and 3pm at mid winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas.	Site is located in the Sydney Metropolitan Area. 83 units / 70% of total apartments across the development receive direct solar access to living rooms and private open spaces for 2hrs between 9am and 3pm in mid-winter. Refer to architectural plan SSD600	Complies
4A-1 (2)	Design Criteria 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 9am and 3pm at mid winter	Not applicable	N/A
4A-1 (3)	Design Criteria 3: A maximum of 15% of apartments in a building receive no direct sunlight between 9am and 3pm at mid winter	13 units / 11% of total apartments across the development receive no-direct sunlight between 0am-3pm in mid-winter Refer to architectural plan SSD600	Complies
4A-2	Daylight access is maximized where sunlight is limited	Daylight has been maximised to all units while balancing visual privacy and an efficient glazing to wall ratio.	Complies
4A-3	Design incorporates shading and glare control, particularly for warmer months	Glazing types will be specified appropriate to each orientation with low-e coatings and SHGC factors incorporated, consistent with the BASIX report. Façade articulation and orientation also assist with shading and glare control.	Complies

4B Natural Ventilation

4B-1	All habitable rooms are naturally ventilated	All habitable rooms are provided with operable windows for natural ventilation.	Complies
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4C Ceiling Heights													
4C-2	Ceiling height increases the sense of space in apartments and provides for well proportioned rooms	2.7m ceiling height are provided to all habitable areas.	Complies										
4C-3	Ceiling heights contribute to the flexibility of building use over the life of the building	Site is zoned R4 and will be used in perpetuity for residential functions, with the exception of the child care centre.	Complies										
	Objective	Proposal	Compliance										
4D Apartment Size and Layout													
4D-1	The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity	Apartment and room layouts have been designed to provide a high level of amenity to future residents.	Complies										
4D-1 (1)	<p>Design Criteria 1: Apartments are required to have the following minimum internal areas:</p> <table border="0"> <thead> <tr> <th>Apartment type</th> <th>Minimum internal areas</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>35 m2</td> </tr> <tr> <td>1 bedroom</td> <td>50 m2</td> </tr> <tr> <td>2 bedroom</td> <td>70 m2</td> </tr> <tr> <td>3 bedroom</td> <td>90 m2</td> </tr> </tbody> </table> <p>The minimum areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5 m2 each.</p> <p>A fourth bedroom and further additional bedrooms increase the minimum internal area by 12 m2 each.</p>	Apartment type	Minimum internal areas	Studio	35 m2	1 bedroom	50 m2	2 bedroom	70 m2	3 bedroom	90 m2	All apartment internal areas meet or exceed minimum guidelines.	Complies
Apartment type	Minimum internal areas												
Studio	35 m2												
1 bedroom	50 m2												
2 bedroom	70 m2												
3 bedroom	90 m2												
4D-1 (2)	<p>Design Criteria 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.</p>	All habitable rooms have windows that exceed 10% of the room's floor area.	Complies										
4A Apartment Size and Layout													
4D-2	Environmental performance of the apartment is maximised	Refer to responses in Part 4A and 4B on this table.	Complies										

4D-2 (1)	Design Criteria 1: Habitable room depths are limited to a maximum of 2.5 x the ceiling	<ul style="list-style-type: none"> Apartment depths are limited to maximize ventilation and airflow, with the face of the kitchens located no more than 8.1m from a window. All kitchens are fixed, hence the 8.1m daylight access measurement. All kitchens are located directly adjacent to an open plan living and dining layout, thus benefiting from borrowed daylight, ventilation and outlook. All apartments meet the minimum internal areas recommended by the ADG. Further, minimum room dimensions are generally achieved and furniture placements demonstrate the functional use of spaces. 	Complies
4D-2 (2)	Design Criteria 2: In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window.	<ul style="list-style-type: none"> Sufficient natural ventilation and daylight access within apartments is provided. Figure 4D.3 of the ADG allows for 2.7x3 as the open plan room depth (yielding 8.1m). 	Complies
4D-3	Apartment layouts are designed to accommodate a variety of household activities and needs	Apartments are designed to accommodate both active and passive daily uses to suit various households.	Complies
4D-3 (1)	Design Criteria 1: Master bedrooms have a minimum area of 10 m ² and other bedrooms 9 m ² (excluding wardrobe space)	All master bedrooms have minimum areas of, or exceed, 10sqm	Complies
4D-3 (2)	Design Criteria 2: Bedrooms have a minimum dimension of 3m (excluding wardrobe space)	All bedrooms have a minimum dimension of 3m	Complies
4D-3 (3)	Design Criteria 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 combined living rooms for 1 bedroom apartments have a minimum width of 3.6m. All combined living rooms for 2, 3, and 4 bedroom apartments have a minimum width of 4.0m	Complies
4D-3 (4)	Design Criteria 4: The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts	All cross-through apartments have internal widths exceeding 4m.	Complies
4E Private Open Space and Balconies			
4E-1	Apartments provide appropriately sized private open space and balconies to enhance residential amenity	Refer to point 4E-1 (1)	Complies
4E-1 (1)	Design Criteria 1: All apartments are required to have primary balconies as follows:	Private open spaces satisfy, and where possible exceed, provisions of this criteria.	Complies

	<p>Dwelling type Min area Min depth</p> <p>Studio apartments 4 m2 -</p> <p>1 bed apartments 8 m2 2m</p> <p>2 bed apartments 10 m2 2m</p> <p>3+ bed apartments 12 m2 2.4m</p> <p>The minimum balcony depth to be counted as contributing to the balcony area is 1m</p>		
4E-1 (2)	<p>Design Criteria 2:</p> <p>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 15 m2 and a minimum depth of 3m.</p>	Private open space to all ground floor apartments (in the form of courtyards) have a minimum area of 15sqm and depth of 3m.	Complies
	Objective	Proposal	Compliance
4E Private Open Space and Balconies			
4E-2	Primary private open space and balconies are appropriately located to enhance livability for residents	Balconies and private open spaces are orientated to emphasize outlook and solar access. All balconies open directly from living areas, and where possible also from bedrooms.	Complies
4E-3	Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building	Balconies have been incorporated into the overall design presentation of the development.	Complies
4E-4	Private open space and balcony design maximises safety	All relevant regulatory requirements have been satisfied in the balcony design	Complies
4F Common Circulation and Spaces			
4F-1	Common circulation spaces achieve good amenity and properly service the number of apartments	Refer to point 4F-1 (1)	Complies
4F-1 (1)	Design Criteria 1: The maximum number of apartments off a circulation core on a single level is eight	All common circulation spaces incorporate an external opening, providing a source of natural light. The maximum number of apartments of a single circulation core is seven.	Complies
4F-1 (2)	Design Criteria 2: For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.	Not applicable.	Complies
4F-2	Common circulation spaces promote safety and provide for social interaction between residents	All common circulation spaces have direct lines of sight, avoiding blind spots. This promotes resident safety and encourages chance interactions between residents.	Complies

4G Storage													
4G-1	Adequate, well designed storage is provided in each apartment	Each apartment is provided with internal storage areas and basement storage cages.	Complies										
4G-1 (1)	<p>Design Criteria 1: In addition to storage in kitchen, bathrooms and bedrooms, the following storage is provided:</p> <table border="0"> <tr> <td>Dwelling type</td> <td>Storage size volume</td> </tr> <tr> <td>Studio apartments</td> <td>4 m3</td> </tr> <tr> <td>1 bedroom apartments</td> <td>6 m3</td> </tr> <tr> <td>2 bedroom apartments</td> <td>8 m3</td> </tr> <tr> <td>3+ bedrooms</td> <td>10 m3</td> </tr> </table> <p>At least 50% of the required storage is to be located within the apartment</p>	Dwelling type	Storage size volume	Studio apartments	4 m3	1 bedroom apartments	6 m3	2 bedroom apartments	8 m3	3+ bedrooms	10 m3	Apartments are provided with adequate storage with a min. 50% located within units, and the remaining allocation located in secure, dedicated storage cages within the basement. Refer to pages 49, 50, 51, 52 of this report.	Complies
Dwelling type	Storage size volume												
Studio apartments	4 m3												
1 bedroom apartments	6 m3												
2 bedroom apartments	8 m3												
3+ bedrooms	10 m3												
4G-2	Additional storage is conveniently located, accessible and nominated for individual apartments	Additional storage within the basement is dedicated within residential parking areas as secure cages.	Complies										
	Objective	Proposal	Compliance										
4H Acoustic Privacy													
4H-1	Noise transfer is minimised through the siting of buildings and building layout	Apartment types are stack vertically where possible to ensure complimentary rooms are located above one another, minimising opposing uses and noise transmission. Floor plans have been laid out to further provide complimentary room uses adjacent to each other where possible.	Complies										
4H-2	Noise transfer is minimised through the siting of buildings and building layout	Bathrooms and laundries are located away from the main living area where possible. Storage and circulation spaces are located to further aid acoustic separation. Party walls will be provided with appropriate treatments to meet acoustic requirements. Refer to Acoustic report by Rodney Stevens.	Complies										
4J Noise and Pollution													
4J-1	In noisy or hostile environments the impacts of external noise and pollution are minimised through the careful siting and layout of buildings.	Primary built form follows relevant controls. Design development seeks to minimise acoustic impacts, through the use of street trees, inset balconies and solid mass facade treatments. Refer to Acoustic report by Rodney Stevens.	Complies										
4J-2	Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission.	Glazing and external wall specifications will support acoustic protection of apartment internal environments. Refer to Acoustic report by Rodney Stevens.	Complies										

	Objective	Proposal	Compliance
4K Apartment Mix			
4K-1	A range of apartment types and sizes is provided to cater for different household types now and into the future.	A range of unit types and sizes are provided, ranging from 1 bed, 2 bed, 3 bed, and 4 bed apartments. The proposal has 35 large sized apartments (3 bed and 4 bed units) representing 29% of total apartments across the development. This allows for housing diversity and family-friendly apartments in support of LEP objectives. 15% of total apartments are designed to be adaptable units, and 20% of total apartments are designed to achieve LHA Silver Level, in support of DCP and ADG objectives.	Complies
4K-2	The apartment mix is distributed to suitable locations within the building	Apartment types are well distributed across all floorplans.	Complies
4L Ground Floor Apartments			
4L-1	Street frontage activity is maximised where ground floor apartments are located	Courtyards to ground floor apartments are oriented towards Donald street where possible to provide activation and surveillance, with landscaping utilized to maintain resident privacy to these units.	Complies
4L-2	Design of ground floor apartments delivers amenity and safety for residents	Apartments are provided with increased private open space where level terrain is possible, this allows for generous private courtyards that are family friendly, and with an interface to Donald street where possible.	Complies
4M Facades			
4M-1	Building facades provide visual interest along the street respecting the character of the local area	Facade articulation is designed to provide a singular identity in its locality, it is a direct response to a resolved scale and proportion correlating to the desired future character of the local area. Building façade is articulated with a defined building base, and body.	Complies
4M-2	Building functions are expressed by the facade	Common building entries are clearly legible from the rest of the building, with Building A2 given visual prominence along Donald Street as a built form bookend to the development.	Complies
4N Roof Design			
4N-1	Roof treatments are integrated into the building design and positively respond to the street.	Flat roofs are proposed as part of the overall design.	Complies
4N-2	Opportunities to use roof space for residential accommodation and open space are maximised	Roofs are used to accommodate required plant equipment, concealing these services from the public domain.	Complies

4N-3	Roof design incorporates sustainability features	All buildings across the development are designed to comply with BASIX and NatHers certification.	Complies
	Objective	Proposal	Compliance
4O Landscape Design			
4O-1	Landscape design is viable and sustainable	Landscaping has been specified for the current climate of Carlingford with a range of native species supporting biodiversity.	Complies
4O-2	Landscape design contributes to the streetscape and amenity	Landscaping at ground level has been designed to enhance the public realm and neighbour experience along the site's boundaries, and resident experience within the central communal open space. Refer to the Landscape package by Conzept.	Complies
4P Planting on Structures			
4P-1	Appropriate soil profiles are provided	Soil profiles for landscaping on slab have been specified and designed by qualified landscape architects in line with ADG guidelines.	Complies
4P-2	Plant growth is optimized with appropriate selection and maintenance	Refer to the Landscape package prepared by Conzept for proposed planting selections.	Complies
4P-3	Planting on structure contributes to the quality and amenity of communal and public open spaces	Planting is a key component of creating a welcoming and comfortable space. Scale and species type have been located to provide shading, soften environment and provide privacy and separation where necessary.	Complies
4Q Universal Design			
4Q-1	Universal design features are included in apartment design to promote flexible housing for all community members	24 units / 20% of apartments across the development are designed to satisfy Livable Housing Australia Silver Level design standards. Refer to SSD501.	Complies
4Q-2	A variety of apartments with adaptable designs are provided	18 units / 15.2% of apartments across the development are provided for future adaptation. Refer to SSD501, SSD503, SSD504.	Complies
4Q-3	Apartment layouts are flexible and accommodate a range of lifestyle needs	Apartment layouts are designed to provide simple, regular room forms for ease of use and adaption.	Complies
4R Adaptive Reuse			
4R-1	New additions to existing buildings are contemporary and complementary and enhance area's identity and sense of place	No existing buildings to be retained.	Complies

4R-2	Adapted buildings provide residential amenity while not precluding future adaptive reuse	Not Applicable	Complies
	Objective	Proposal	Compliance
4S Mixed Use			
4S-1	Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement	A child care centre is provided in Building B, servicing future expanding demand in an area zoned for high density residential and located directly across Harold West Reserve.	Complies
4S-2	Residential levels of the building are integrated within the development, and safety and amenity is maximised for residents	Residential levels in Building B are aligned with levels in Building A as well as Moseley street.	Complies
4T Awnings and Signage			
4T-1	Awnings are well located and compliment and integrate with the building design	Not applicable.	Complies
4T-2	Signage responds to the context and desired streetscape character	Building signage will be subtle, and not dominate the visual amenity of the streetscape along Moseley and Donald street.	Complies
4U Energy Efficiency			
4U-1	Development incorporates passive environmental design	Building orientation, articulation and massing have been organised to support passive solar access, natural cross ventilation and outlook within the limits of the approved form.	Complies
4U-2	Development incorporates passive solar design to optimize heat storage in winter and reduce heat transfer in summer	Facade projections, eaves and balcony positions work coherently to support passive shading during summer in minimising heat gain, whilst allowing solar access during winter in allowing heat storage by way of thermal mass.	Complies
4U-3	Adequate natural ventilation minimises the need for mechanical ventilation	All habitable rooms are provided with operable windows for natural ventilation. Cross ventilation strategies required at lower levels are extended through to upper levels. Refer to part 4B	Complies
4V Water Management and Conservation			
4V-1	Potable water use is minimised	Water efficient fixtures and fittings are provided throughout for residential uses to further reduce potable water use.	Complies
4V-2	Urban stormwater is treated on site before being discharged to receiving waters	Refer to Stormwater Concept Plans by SGC	Complies

4V-3	Flood management systems are designed to minimise impacts on the streetscape, building entry and amenity of residents	Refer to Flood Risk Management Report by SGC	Complies
	Objective	Proposal	Compliance
4W Waste Management			
4W-1	Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents	Waste chutes are provided at each residential level, along with separate recycling collection bins. Waste storage areas are located in dedicated rooms within the basement level. Waste collection is to occur within along the kerb on Donald Street.	Complies
4W-2	Domestic waste is minimised by providing safe and convenient source separation and recycling	Each building is provided with separate general and recycling waste collection facilities	Complies
4X Building Maintenance			
4X-1	Building design detail provides protection from weathering	Building material have been selected for their low maintenance requirements, and detailing will be resolved to minimise staining of surfaces.	Complies
4X-2	Systems and access enable ease of maintenance	Suitable access for cleaning and maintenance has been designed for all appropriate areas. Manual systems are preferred over mechanical systems where possible to reduce maintenance requirements on future residents.	Complies
4X-3	Material selection reduces ongoing maintenance cost	Applied finishes have been minimised where possible to reduce maintenance. Materials and finishes will be specified for their longevity and minimal maintenance requirements	Complies

9.0 SUMMARY OF ITEMS TO BE ADDRESSED

Provided below are responses to items raised by the Department of Planning, Housing and Infrastructure (Attachment A of letter dated 7th November 2025) and City of Parramatta Council (Appendix 1 of letter dated 22nd October 2025).

A. DPHI ITEMS TO BE ADDRESSED

Low and Mid-Rise (LMR) Provisions

1. In accordance with the definition of walking distance under the State Environmental Planning Policy (Housing) 2021 (Housing SEPP), the site appears to be located within the LMR Outer Area (i.e. between 400m to 800m walking distance from the mapped Carlingford Court shopping centre) noting the nearest crossing of Pennant Hills Road is at the Carlingford Road intersection. Unless it can be demonstrated that the site is located within 400m walking distance of the mapped Carlingford Court shopping centre, the application should be amended to:

- accurately describe the correct development standards applicable to the LMR Outer Area
- reconsider and provide justification for the proposed height, FSR and built form outcomes, having regard to the maximum permissible height and floor space.

If the proposal seeks to vary the maximum permissible height and floor space, this should be informed by robust justification of how the proposal would be consistent with the objectives of the controls, as well as a comprehensive assessment of the potential impacts resulting from the proposed exceedances of the applicable development standards and demonstration that they are acceptable.

Response_

The development has been revised adopting development provisions applicable to the Low and Mid-Rise Housing Outer Area, with justifications provided for variations to proposed height and floor space ratio. Refer to Clause 4.6 variations prepared by Urbis.

Setbacks

2. Review the proposed building setbacks, noting all balconies and habitable rooms should be set back a minimum of 6 metres (up to four storeys), 9 metres (between five and eight storeys), and 12 metres (nine storeys and above) from the side and rear boundaries, in accordance with the design criteria of the Apartment Design Guide (ADG). Currently several variations to the ADG design criteria have not been acknowledged or justified in the Design Report or the EIS. These include:

- Building A2 does not achieve the required 9-metre setback to the southern boundary from Level 3 and above (between five and eight storeys)
- the north-eastern portion of Building B at Level 6 is not setback 9 metres from the eastern boundary (between five and eight storeys)
- the north-western portion of Building B at Level 6 is not setback 9 metres from the western boundary (between five and eight storeys)
- the ninth storey of Buildings A2 and B is not setback 12 metres from their respective adjoining boundaries

Response_

- Building A2 adopts a constant building presentation to the southern site boundary from ground to top, which is shared with neighbouring lots that have the same development potential. As a result of building alignment, this presentation adopts a setback which varies between 8.5m to 9m to the common boundary, with the later to Donald street. This means from Levels G to 3 (first to fourth storey) an additional 2.5m to 3m is provided in excess to the required setback, from Levels 4 to 7 (fifth to eighth storey) the applied setback is generally consistent with the ADG design criteria for 9m.
- Due to the site topography, Building B has been designed such that its Level 3 is aligned with levels along Moseley Street. Therefore its Level 3 technically serves as its first storey above natural ground level. With reference to the North Elevation on Architectural Plan SSD 300, applied side setbacks along the north-eastern and north-western portion of Building B have been applied consistent with the ADG; being minimum 6m from Levels 3 to 6 (first to fourth storey), and minimum 9m from Levels 7 to 8 (fifth to sixth storey).
- The ninth storey of Building A2 adopts a blank wall presentation to the southern boundary with no openings proposed, with the internal spaces being non-habitable rooms. Referencing Part 3F of the ADG, the required setback for non-habitable rooms for 9+ storeys is only 6m. The proposed 9m side setback therefore exceeds this requirement. Impacts of the proposed top storey setbacks are also tested through overshadowing analysis of neighbouring properties, and results demonstrate that additional shadow impacts are only minor.

Refer to Architectural Plans SSD 700 to SSD 712

Building B no longer has a ninth storey.

Visual Privacy

3. Review the proposed building separation distance between Buildings A1 and B2, noting the minimum ADG separation distances are not achieved from Level 6 and above, resulting in potential privacy and amenity impacts for future residents.

4. Review the separation, floor plan layout, orientation of openings and privacy mitigation measures between Buildings A1 and A2, noting in several instances, bedroom windows in close proximity directly face each other.

Response_

- Privacy amenity for future residents are maintained through multiple design solutions; oblique and staggered window placements avoiding direct lines of sight between buildings, use of high level windows with minimum sill heights of 1.8m for more sensitive openings, minimizing quantity of external openings.
- Further to the above, Buildings A1 and B have different orientations. These orientations are carried through apartment layout and internal spaces, resulting in internal rooms being oblique to each other across the two buildings.

Acoustic Privacy

5. Review the design to ensure rooms with similar uses are grouped together to avoid noise transfer between apartments, particularly in instances where bedrooms adjoin the principal living areas of neighbouring apartments (e.g. the bedroom of apartment 316 adjoins the living room of apartment 317).

Response_

- Apartment party walls will be constructed to comply with NCC requirements for noise attenuation between rooms of different uses.

Solar and Daylight Access

6. Review the solar access analysis and calculations noting the Design Report indicates 96 of 136 apartments (70.5%) would receive a minimum of two hours of solar access between 9am and 3pm mid-winter but this analysis appears to count apartments with minimal solar access as compliant, for example, apartments 104, 204 and 707.

7. Provide the following information:

- sun eye diagrams at 30mins interval, clearly highlighting which apartments receive solar access
- a solar access matrix clearly showing the exact duration of solar access (hours and minutes) achieved by each apartment.

Response_

- 83 of 118 apartments (70.3%) receive a minimum of two hours of solar access between 9am and 3pm mid-winter.
- Sun eye diagrams are provided. Refer to Architectural Plan SSD 601.
- Solar Matrix as below

**BUILDING
A**

Unit	9am	10am	11am	12pm	13pm	14pm	15pm
G01	✓	✓	✓	✓			
G02		✓	✓	✓			
G03	✓	✓	✓				
G04							
G05							
G06							✓

2hrs	No solar
✓	
✓	
✓	
	✓
	✓

101	✓	✓	✓	✓	✓		
102		✓	✓	✓	✓		
103	✓	✓					
104	✓						
105							
106							✓
107							✓

✓	
✓	
	✓

201	✓	✓	✓	✓	✓		
202	✓	✓	✓	✓	✓		
203	✓	✓					
204	✓						
205							
206							✓
207							✓

✓	
✓	
✓	
	✓

301	✓	✓	✓	✓	✓	✓	
302	✓	✓	✓	✓	✓	✓	
303	✓	✓					
304	✓						
305							
306							✓
307							✓

✓	
✓	
✓	
	✓

401	✓	✓	✓	✓	✓	✓	
402	✓	✓	✓	✓	✓	✓	
403	✓	✓	✓				
404	✓						
405							
406							✓
407							✓

✓	
✓	
✓	
	✓

Unit	9am	10am	11am	12pm	13pm	14pm	15pm
------	-----	------	------	------	------	------	------

2hrs	No solar
------	----------

501	✓	✓	✓	✓	✓	✓	
502	✓	✓	✓	✓	✓	✓	
503	✓	✓	✓	✓			
504	✓	✓	✓				
505							
506							✓
507							✓

✓	
✓	
✓	
✓	
	✓

601	✓	✓	✓	✓	✓	✓	✓
602	✓	✓	✓	✓	✓	✓	
603	✓	✓	✓	✓			
604	✓	✓	✓	✓	✓		
605					✓		
606							✓
607							✓

✓	
✓	
✓	
✓	

701	✓	✓	✓	✓	✓	✓	✓
702	✓	✓	✓	✓	✓	✓	
703	✓	✓	✓	✓			
704	✓	✓	✓	✓	✓		
705					✓	✓	✓
706							✓
707							✓

✓	
✓	
✓	
✓	
✓	

801	✓	✓	✓	✓	✓	✓	✓
802	✓	✓	✓	✓			
803	✓	✓	✓	✓	✓		
804					✓	✓	✓
805							✓

✓	
✓	
✓	
✓	

**BUILDING
B**

Unit	9am	10am	11am	12pm	13pm	14pm	15pm
308	✓	✓	✓				
309							
310				✓	✓	✓	✓
311			✓	✓	✓	✓	
312					✓	✓	✓
313	✓	✓	✓	✓	✓	✓	✓
314	✓	✓	✓	✓	✓	✓	✓
315	✓	✓	✓	✓	✓	✓	✓
316	✓	✓	✓	✓	✓	✓	✓
317	✓	✓	✓	✓	✓	✓	✓

2hrs	No solar
✓	
	✓
✓	
✓	
✓	
✓	
✓	
✓	
✓	
✓	
✓	

408	✓	✓	✓				
409							
410				✓	✓	✓	✓
411			✓	✓	✓	✓	
412					✓	✓	✓
413	✓	✓	✓	✓	✓	✓	✓
414	✓	✓	✓	✓	✓	✓	✓
415	✓	✓	✓	✓	✓	✓	✓
416	✓	✓	✓	✓	✓	✓	✓
417	✓	✓	✓	✓	✓	✓	✓

✓	
	✓
✓	
✓	
✓	
✓	
✓	
✓	
✓	
✓	

508	✓	✓	✓				
509							
510				✓	✓	✓	✓
511			✓	✓	✓	✓	
512					✓	✓	✓
513	✓	✓	✓	✓	✓	✓	✓
514	✓	✓	✓	✓	✓	✓	✓
515	✓	✓	✓	✓	✓	✓	✓
516	✓	✓	✓	✓	✓	✓	✓
517	✓	✓	✓	✓	✓	✓	✓

✓	
	✓
✓	
✓	
✓	
✓	
✓	
✓	
✓	
✓	

Unit	9am	10am	11am	12pm	13pm	14pm	15pm
608	✓	✓	✓				
609							
610				✓	✓	✓	✓
611			✓	✓	✓	✓	
612					✓	✓	✓
613	✓	✓	✓	✓	✓	✓	✓
614	✓	✓	✓	✓	✓	✓	✓
615	✓	✓	✓	✓	✓	✓	✓
616	✓	✓	✓	✓	✓	✓	✓
617	✓	✓	✓	✓	✓	✓	✓

2hrs	No solar
✓	
	✓
✓	
✓	
✓	
✓	
✓	
✓	
✓	
✓	
✓	

708	✓	✓	✓	✓	✓	✓	✓
709							
710				✓	✓	✓	✓
711			✓	✓	✓	✓	
712					✓	✓	✓
713	✓	✓	✓	✓	✓	✓	✓
714	✓	✓	✓	✓	✓	✓	✓
715	✓	✓	✓	✓	✓	✓	✓
716	✓	✓	✓	✓	✓	✓	✓

✓	
	✓
✓	
✓	
✓	
✓	
✓	
✓	
✓	

806	✓	✓	✓	✓	✓	✓	✓
807							
808				✓	✓	✓	✓
809			✓	✓	✓	✓	
810					✓	✓	✓
811	✓	✓	✓	✓	✓	✓	✓
812	✓	✓	✓	✓	✓	✓	✓
813	✓	✓	✓	✓	✓	✓	✓
814	✓	✓	✓	✓	✓	✓	✓

✓	
	✓
✓	
✓	
✓	
✓	
✓	
✓	
✓	

Natural Ventilation

8. Review the internal layout, noting a number of apartments have a crossover depth exceeding 18 metres, which has not been acknowledged or justified in the Design Report. For example, apartments 708, 806, 901, and 1001.

Response_

- Units 708 and 806 provide significant internal resident amenity despite their lengths. These units have 3 separate external aspects; being a primary northern orientation, supplemented by eastern and southern side external elevations. Natural ventilation is achieved via cross ventilation (instead of cross-over or cross-through ventilation) between north and eastern oriented openings, as well as between south and eastern oriented openings.

Affordable Housing- Amenity and Delivery

9. Provide further information demonstrating the affordable apartments would achieve a level of amenity that is equitable to the market apartments, particularly in relation to solar access and cross ventilation.

10. Review the proposed delivery of the affordable housing gross floor area (GFA), noting Stage 1 comprises only seven affordable dwellings (6.25%) with the remaining dwellings to be delivered in Stage 2. While the Department would consider the staging of affordable housing delivery, the amount of affordable housing in Stage 1 must constitute at least 15% of the GFA for that stage.

Response_

- 23 apartments are allocated as affordable housing; 14 units (61%) receive 2 hours of solar access during mid-winter, only 3 units (13%) receive no direct solar access during mid-winter, and 17 units (74%) achieve natural cross ventilation. Refer to Architectural Plan SSD 516.
- Notwithstanding the above, reference is made to SEPP (Housing) 2021 Chapter 2, Part 2, Division 1, Section 19(3) which states that subsection 2(c) and (d) relating to deep soil and solar access provisions do not apply to development to which Chapter 4 Design of Residential Apartment Development applies.
- The provision of affordable housing is derived from, and applied to, the development as a whole and not based on individual stages. Staging has been proposed simply for construction considerations, and not for the distribution of units.
- Technically, allocating the majority of affordable housing units in Building B presents greater amenity benefits to future residents of these units; first, a northern aspect allows for greater solar access, second, uninterrupted view outlooks onto Harold West Reserve. It can be argued that it is therefore beneficial to have a greater distribution of affordable units in Building B.

Car Parking

11. As the site is located within an accessible area, the number of residential car parking spaces should be reduced in line with the rates for market and affordable housing specified in the Housing SEPP.

Response_

- Refer to Traffic Statement dated 4th December 2025, prepared by Stanbury Traffic Planning.

Landscaping and Trees

12. Provide updated landscape plans or a tree canopy plan that demonstrate how the proposed landscape strategy aligns with the Tree Canopy Guide for Low and Mid Rise Housing, in accordance with Section 177 of the Housing SEPP.

13. Review and amend the design as necessary to ensure retention of significant trees T68 and T71. The arborist must be updated to:

- Include analysis of potential impacts within the structural root and tree protection zones of the trees, including tree root mapping investigations where warranted.
- Detail protection measures and construction methodologies that minimise encroachments within the Tree Protection Zones.

14. Provide clarification on the total proposed landscaped area noting there is an inconsistency between the figures shown on the landscape (35.8%) and architectural plans (32.4%).

Response_

- Refer to updated Landscape Plans dated December 2025, prepared by Conzept Landscape Architects
- Refer to Arboricultural Statement dated 10th December 2025, prepared by Ezigrow

Childcare Centre

15. Provide further consideration of the proposal against the Childcare Planning Guideline (CCPG), noting:

- the outdoor play areas are subject to potential overlooking from the balconies of Units 310 and 311, as well as from the entry ramps to Building B
- several structural columns are located within the outdoor play area and should be excluded from the outdoor play area calculations
- the portion of the outdoor play area affected by the substation's exclusion zone should not be used for children's activities and should therefore be excluded from the play area calculations
- the submitted Noise Impact Assessment indicates that there will be 20 children aged 0–2 years; however, the indicative indoor play area calculation does not account for the cot room and nappy change facilities.

Response_

- To address potential overlooking concerns, a planter is proposed to the front of balconies to units 310 and 311. This planter measures 1m in depth and 1m in height. Through further testing, this is sufficient to obscure direct lines of sight from the balcony edge onto the outdoor play areas. Refer to Architectural Plan SSD 204.
- Column placements within the childcare centre outdoor play area have been revised upon receipt of structural engineering advice, and measurement of outdoor play area has been revised to only include floor area, excluding columns.
- The outdoor play area adjacent to the substation will be protected by a 3m high solid blast wall, protecting any children's activities that occur behind the wall.
- Cot room and nappy change facilities included. Refer to Architectural Plan SSD 204.

Additional Information

16. Provide a minimum of two longitudinal and two cross sections per building. The sections must be clearly show:

- the uppermost point of the building dimensioned relative to the existing ground level directly beneath; and
- the relevant property boundaries to illustrate compliance with the height and setback controls

Response_

- Cross sections provided per building. Refer to Architectural Plan SSD 303 and SSD 304.

17. Amend the architectural plans to clearly identify balconies as outdoor private open space. The balconies are not clearly identified for Units 314 and 306.

Response_

- All balcony areas indicated with tiled fill. Refer to Architectural Plan SSD 205.

18. Submit an amended Design Report that provides a comprehensive assessment against all relevant design criteria outlined in the Apartment Design Guide (ADG) including Parts 4H, 4J, 4K, and 4O. Adequate justification must be provided where specific criteria are not met.

Response_

- Refer to Chapter 8 of this report.

19. Amend the architectural plans to include an internal area schedule to enable assessment of apartment size and layout against Part 4D of the ADG.

Response_

- Refer to page 49, 50, 51, 52 of this report

20. Provide a storage area calculation plan that clearly identifies the required storage volume, demonstrating that at least 50% of the required storage is located within each apartment.

Response_

- Refer to page 49, 50, 51, 52 of this report

21. Clarify the percentage of units that are designed to meet Liveable Housing Australia (LHA) standards. The Design Report indicates 20% of units are LHA-compliant, whereas the architectural plans show only 15%.

Response_

- 24 units of 118 total apartments (20%) are designed to satisfy Livable Housing Australia Silver level design requirements.

22. Provide a Crime Prevention Through Environmental Design Report as recommended in the Social Impact Assessment and noting the mixed-use nature of the development.

Response_

- Refer to Chapter 7 of this report

23. Provide a Wind Impact Assessment for all communal open spaces, including rooftop communal open space areas.

Response_

- Rooftop communal open space has been removed.
- Refer to Wind Assessment dated 11th December 2025, prepared by Capital Engineering Consultants

24. Provide a breakdown of solar access and natural ventilation calculations for each building.

Response_

- Refer to page 49, 50, 51, 52 of this report.

25. *Confirm tandem parking spaces would be allocated to single apartments.*

Response_

- Confirmed. Refer to Traffic Statement dated 4 December 2025, prepared by Stanbury Traffic Planning.

26. *Provide plans which clearly depict the height and location of any fencing on the architectural and landscape plans.*

Response_

- Refer to Architectural Plan SSD 202

27. *Provide an updated geotechnical report to clarify the information requested by NSW DCCEEW Water Group.*

Response_

- Refer to Geotechnical Desktop Study dated 3rd December 2025, prepared by CEC Geotechnical.

28. *Provide updated GFA calculation plans that:*

- include all above-ground bin storage areas located within common circulation areas as GFA

- incorporate the area highlighted in yellow on the childcare centre floor plan within the GFA calculation

Response_

- GFA calculation updated to include items above. Refer to architectural plan SSD 500.

B. CITY OF PARRAMATTA COUNCIL ITEMS TO BE ADDRESSED

APPENDIX 1 - Detailed Objections/Comments

Floor Space Ratio / Height

The development is seeking to utilise the base FSR and Building Height controls prescribed under Chapter 6 – Low and Mid Rise Housing of State Environmental Planning Policy (Housing) 2021. Specifically, the proponent has identified the site as a 'low and mid rise housing inner area' which allows for a maximum FSR of 2.2:1 and a maximum building height of 22m (capped at 6 storeys) under Clauses 180 and 175, respectively.

Council is of the opinion that the subject site should instead be identified as a 'low and mid rise housing outer area' as it is not located within 400m walking distance to Carlingford Court Town Centre. Walking distance means the shortest distance between 2 points measured along a route that may be safely walked by a pedestrian using, as far as reasonably practicable, public footpaths and pedestrian crossings.

As demonstrated in Figure 1 below, safely walking from the site to Carlingford town centre requires travelling approximately 200m down Pennant Hills Road before crossing on the southern side of the Carlingford Road intersection. This results in a total walking distance of approximately 435m.

Accordingly, the base FSR is a maximum of 1.5:1 and the base maximum building height is 17.5m. The proposed development in its current form is therefore not compliant with the controls under Clauses 180 and 175, respectively.

Response_

- Refer to response in Part A DPHI, Point 1 above.

Floor Space Ratio/Height continued

Applying the affordable housing bonus pursuant to clause 16 of the Housing SEPP:

- *The maximum permissible FSR on the site is 1.95:1. As such, the proposal, at 2.36:1, represents a 21% variation.*
- *The maximum permissible building height on the site is 20.8m (northern part of site) – 27.3m (southern part of site). As such, the proposal, at 31.7m, represents a 16-52% variation.*

Given the significant incompatibility of the proposal with the existing and desired future development under the existing LEP, it is unlikely that variations of these quantities would be able to demonstrate compliance is unreasonable/unnecessary, or that there are sufficient environmental planning grounds, as:

The proposal would not be consistent with the relevant objectives of the controls, namely:

- *to provide appropriate height transitions between buildings and to provide a transition in built form and land use intensity,*
- *to ensure the height of buildings is compatible with the height of existing and desired future development in the surrounding area,*
- *to minimise visual impact, disruption of views, loss of privacy and loss of solar access to existing development,*
- *to reinforce and respect the existing character and scale of low density residential areas (opposite site to north).*

- *The controls are reasonable and have not been abandoned.*
- *There are no site-specific constraints which justify the variation.*
- *The additional public benefit of more affordable housing would not offset the impacts, particularly related to bulk, amenity and transition in built form.*

The proposal's lack of compliance even with the non-applicable 28.6m control (22m x 30% affordable bonus) is further evidence of the overdevelopment of the site.

Response_

- The proposed building envelope to Building B has been reduced, from 8 storeys down to 6 storeys, to be more in line with the height of newly completed apartment buildings along Moseley Street. This allows the development to be more compatible with the desired future character along the street, and serve as a transitional element to the existing low density residential areas to the North.
- As a result of the above, the proposed FSR is also reduced from 2.36:1 down to 2.05:1, representing a 5% variation.

Landscape

There were extensive discussions during the Land and Environment Court proceedings for the previously approved development (DA/222/2024) involving the retention and protection of significant trees T30 (AA), T68 (AA) and T71 (A). Ultimately, the negotiations resulted in the buildings and infrastructure being setback to retain these trees.

This proposal shows trees T68 and T71 to be removed which is not supported. They are still required to be retained and protected under this proposal.

Response_

- Refer to Arboricultural Statement dated 10th December 2025, prepared by Ezigrow

Urban Design

Scale of development: The scale of the development, at predominantly 9 storeys (in places 10), is significantly out of keeping with the existing and planned density of the area, and will have significant visual impacts, amenity impacts (solar, privacy, noise), and does not appropriately transition to adjoining sites.

Setbacks: Similarly to the tree retention comments above. The required setback to Mosely Street was subject to extensive discussions. Ultimately a 9m street setback was approved which is a reduction from the required 10m that has been established for Mosley Street. The current proposal is further reducing the street setback to 6.5m. A consistent approach to the setback needs to be followed to avoid built form protruding beyond a future building line. It is recommended that the 9m setback be enforced as there is already a recent higher density development on Mosley Street that adheres to the 9m setback.

Articulation: Notwithstanding the height issues, if the building is appropriate reduced in height, a few changes to the building's articulation will reduce its impact further. The proposed articulation for the additional levels has been a straightforward extrusion of the existing DA approved elevations. That DA approved articulation focused on breaking up building length across four levels with a focus on vertical articulation. The proportion of the buildings have changed significantly and a different approach to the articulation focused on breaking up building height needs to be introduced. It is recommended that a more solid, masonry treatment be applied to the façade of the lower three levels for each building to form a plinth to the levels above. A strong horizontal cap/cornice should be applied to strengthen the lower three levels as their own architectural element to each building with a focus also on how the ground level treatment meets the ground plane.

Response_

- A 6.5m front setback to Moseley street is appropriate for the site considering a similar 6m front setback is applied to the recently completed seven storey apartment building on No. 21. The proposed setback simply reinforces an established future building line along Moseley street.
- Further to this, the subject site's northern frontage faces onto an open space (Harold West Reserve) and an open air car parking (St Paul's Anglican Church) across the street, which results in very little pedestrian activity. A reduced front setback will provide greater visibility of pedestrian footpaths along Moseley street, increasing public amenity along the streetscape.

Social Outcomes

Based on the indicative floorplan layout, minimum requirements for a 76 place child care centre cannot be achieved. These issues cannot be resolved at the fitout / internal design stage. Key concerns relating to the child care centre component include:

- *Poor entrance and lack of reception area. The entrance to the facility is directly from the car park into a hallway with direct access to a play room. There is no reception or administration area. This poses concerns for children's safety and the effective management of the centre.*
- *Provision of outdoor play space. There are pillars located throughout the outdoor play area, which impacts the provision of genuinely unencumbered play space. If these are excluded from the calculation of unencumbered play space, the proposal is likely non-compliant.*
- *Design does not meet needs of all age groups. The applicant has not provided a breakdown of proposed ages for the 76 places. The proposed layout does not appear equipped to cater for children aged 0-2 years old (nappy change areas and cot room are not identified).*

- *Solar access. There are concerns about solar access for the outdoor and indoor play spaces, as the above level overhangs a significant proportion of the outdoor play space.*
- *Noise mitigation measures. The proposed noise mitigation measures rely on staggered play times, which impacts children's autonomy and ability to interact with different age groups, and closed windows, which impacts natural ventilation.*
- *Privacy. Risk of overlooking into the outdoor play area.*

Council provides the following recommendations:

- *That the applicant reduce the number of child care places and redesign the facility to ensure that the centre can provide necessary components (e.g. appropriate entrance and reception area, cot room, nappy change areas) while ensuring compliance with requirements for the provision of unencumbered indoor and outdoor play space.*
- *That the impact of any landscaping, acoustic walls, and pillars on solar access be assessed to ensure compliance can be achieved.*
- *That design solutions be used to mitigate noise generated by the child care centre, rather than operational measures such as staggered play.*

Response_

- Reception area added to main entry. Refer to Architectural Plan SSD 204.
- Columns excluded from outdoor play area calculation. Refer to Architectural Plan SSD 204.
- Nappy change and cot area added. Refer to Architectural Plan SSD 204.
- Solar access to outdoor and indoor play areas maintained. Refer to Architectural Plan SSD 405.
- Overlooking opportunities mitigated with addition of planter bed. Refer to Architectural Plan SSD 204.

Public Domain

Footpath: On Moseley Street, the existing footpath that was constructed for the display homes was not satisfactorily built and does not meet safety standards. The survey drawing needs to reflect the existing conditions on site accurately and the demolition plan needs to be updated to reflect the demolition of this footpath.

The new footpath on Moseley Street is to be built closer to the kerb, taking into consideration the minimum distance to accommodate the existing light poles. The footpath is to be constructed without exacerbating existing crossfall gradients. A maximum gradient of 2% is recommended instead of the proposed 2.5%.

Street trees: The existing street trees are to be moved closer to the boundary to accommodate the footpath closer to the kerb. Additional street trees are to be added between the existing street trees to achieve 8-10m spacings. Considering site proximity to the wetland and adjacent Estuarine Swamp Oak Twig Rush Forest community, the recommended street tree species is Eucalyptus Robusta to increase wildlife movement, winter food and habitat.

Driveway crossovers: Existing redundant crossovers to be removed and reinstated with Council standard kerbs. New driveway crossings are to be constructed in accordance with the COP standard drawings available on the website.

Response_

- Refer to updated Landscape Plans dated December 2025, prepared by Conzept Landscape Architects

Universal Access

All aspects of the design must be delivered according to the requirements of the BCA, AS1428 suite and best practice universal design. The applicant is requested to seek expert access advice to ensure this is achieved. A few preliminary observations are offered below. This does not represent a comprehensive access review and does not relinquish the applicant from its obligation to provide a fully compliant detailed universally accessible design.

- The paths to the childcare centre are convoluted and should be streamlined.
- There is a step ramp adjoining the 1:14 access way from Mosely Street this is against the BCA D4D12

On an accessway—

- a) a series of connected ramps must not have a combined vertical rise of more than 3.6 m; and
- b) a landing for a step ramp must not overlap a landing for another step ramp or ramp.

- The lifts providing access to the childcare should be as large as possible to accommodate wheelchairs and mothers with prams.
- The accessible paths of travel to and within the centre appear to be very constrained lacking the circulation areas for persons to pass.

Response_

- Refer to email dated 28th November 2025, from Access Mobility Solutions noting communication with Hamish Murray (City of Parramatta) advising that these items are to be considered at Construction Certificate stage only.

Traffic

Childcare Centre Parking: On level 2, the two parking spaces located near the lift on the eastern most side of the car park do not have satisfactory access as they will require an excessive length a vehicle will need to reverse. Such manoeuvres are particularly hazardous in childcare centres due to the limited rear view visibility to children. Accordingly, these spaces are to be removed from the plans and the car park be reconfigured. Furthermore, it is noted that even with the removal of the two spaces identified above, there is still a surplus of two parking spaces. While there is no objection to this, it is noted that this area will be a high density area in the future with many users of the centre living within walking distance.

Accordingly, it is expected that the parking demand for this centre will not be as high as the number of spaces proposed. Should there be any other benefit (such as landscaping) by reducing the size of the childcare centre carpark, Council would accept a parking provision of 19 spaces as per the DCP provision with a relatively even split between staff and visitor parking.

Bicycle Parking: It is recommended that at least 4 bicycle spaces be provided for the childcare centre component of the development.

Loading and Services: It is noted that the development proposes waste collection from the street, including for the childcare centre, in accordance with the TIA. This approach is considered acceptable. It is noted that section C35 of the Child Care Planning Guidelines 2021, delivery, loading and vehicle turnaround areas are to be in clearly designated and separate facilities away from the pedestrian access to the building. Furthermore, truck movements can be particularly hazardous for children due to significantly restricted sightlines and the unpredictable nature of children. Accordingly, a condition should be included to ensure that there is no truck access to the childcare centre carpark during operating hours.

Basement Design: The design of the basement carpark in the architectural plans differ from the plans assessed within Appendix 2 of the TIA. The following non-compliances are observed with the Architectural Plans and need to be addressed:

Ground Floor and Upper Basement:

1. The aisle width next to the garbage chute is 5.8m as opposed to 6.1m.
2. The aisle width south of the ramp is reduced to 5.65m instead of 5.8m.

Lower Basement:

1. The lengths of the parking bays along the northern side of the car park appear to be 5.3m instead of 5.4m.
2. There are several points in the northern aisle where the width is less than 6.1m when one side of the aisle has a high vertical obstruction.

Vehicular Access:

1. The proposed stormwater pit in Donald Street and also in Moseley Street conflict with the driveways and are not acceptable. All stormwater pits should be at least 1.2m clear of the driveway. This matter can be addressed through revised Civil and Public Domain Plans to be submitted to Council for approval prior to issue of a construction certificate .
2. The TIA proposes a number of Traffic Control measures to improve access to the proposed development including installing No Stopping restrictions at the driveway to improve sight lines. In this regard, it should be noted that generally, Council does not approve signposting of parking restrictions at residential driveways. Accordingly, these measures are unlikely to be approved by Council and do not need to be conditioned.
3. A condition is to be included for the roller shutter door for the driveway in Moseley Street to access the childcare centre to remain open during the operating hours of the centre.
4. The location of the intercom and the roller shutter door for the driveway from Donald Street appear to be mismatched as the intercom is located behind the door. Accordingly, it is unclear how visitors would access the car park. Further, it should be noted that the intercom location must ensure that vehicles stopped are not at a grade of more than 5%. Accordingly, the plans are to be revised to clearly show the location of the roller shutter as well as the intercom and ensure that the location of the control point complies with AS 2890.1.

Response_

- Refer to Traffic Statement dated 4 December 2025, prepared by Stanbury Traffic Planning

Stormwater

1. Swale to capture flows from the local upstream catchment and drain separately to the OSD system
2. Drowned orifice conditions are to be considered for the OSD system with the tailwater level taken as the top of kerb level downstream,
3. Ensure that the proposed easement diversion is consistent that approved by DA/222/2024 and Council's approval is obtained to relocate the easement and reconstruct the system in the proposed locations,
4. Ensure that the stormwater drainage plans and flood protections measures are consistent with those approved in DA/222/2024,
5. The minimum bund level for the basement driveway ramp from Donald Street should be RL100.27m AHD as per the Northrop assessment (SY231114-00-CVLE01-1, dated 7/11/24),
6. The proposed driveway ramp from Moseley Street is not shown on the stormwater drainage plans and appears to be completely negative fall from Moseley Street. A section of positive fall shall be included in this driveway to ensure that kerb flows in Moseley Street do not enter the property. The proposed location of this driveway also conflicts with the proposed kerb inlet Pit 1.03 in Moseley Street.

Response_

- Refer to Stormwater Statement dated 3 December 2025, prepared by SGC

C. TRANSPORT FOR NSW ITEMS TO BE ADDRESSED

TAB A – TfNSW Suggested Conditions of Consent

Construction Pedestrian Traffic Management Plan

Recommended condition: A Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to TfNSW for review and endorsement prior to the issue of a construction certificate.

Please send to development.ctmp.cjp@transport.nsw.gov.au.

Reason: To ameliorate impact of construction activities on the surrounding transport network.

Response_

- Noted.

Green Travel Plan

Recommended Condition: As part of the ongoing operation of the development, a detailed Green Travel Plan (GTP), which includes target mode shares to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually.

Reason: To encourage and support sustainable transport outcomes for future users of the development.

Response_

- Noted

D. DCCEEW WATER ITEMS TO BE ADDRESSED

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Mixed Use Development - Moseley St and Donald St, Carlingford (SSD-83870463) - EIS

1.0 Water take and licensing

1.1 Recommendation - pre determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to quantify the maximum annual volume of water take due to aquifer interference activities and demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes during construction and operation and how this will be managed. DCCEEW Water notes the Geotechnical Investigation (Appendix Q) references drilling to a depth of no greater than 5 metres. However, as the bulk excavation is proposed to a depth of 10.5m, the potential for groundwater interception below 5m and the associated water take has not been assessed. Quantification of the maximum potential annual groundwater take is required for the construction and operational phases of the project and consideration of relevant licensing requirements.

Please see the following links for guidance: Groundwater assessment toolbox for SSD/SSI and Minimum requirements for building site groundwater investigations and reporting.

Response_

- Refer to Geotechnical Desktop Study dated 27th November 2025, prepared by CEC Geotechnical

1.2 Recommendation - post determination

That DPHI requests the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2025.

Explanation

Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the Water Management (General) Regulation 2025 applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 6 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3M L per water year (cl 19, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as

- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and

- the records are kept for 5 years.

Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken can be found at:

<https://water.dpie.nsw.gov.au/licensing-and-trade> and Groundwater access licence exemptions | NSW Government Water.

Response_

- Noted

2.0 Groundwater impacts and dewatering requirements

2.1 Recommendation - pre-determination

If the take of groundwater is found to be greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). Please refer to the following documents:

- https://water.dpie.nsw.gov.au/data/assets/pdf_file/0005/151772/NSW-AquiferInterference-Policy.pdf

- https://water.dpie.nsw.gov.au/data/assets/pdf_file/0007/171097/AquiferInterference-Assessment-Framework.pdf

Explanation

As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.

Response_

- Refer to Geotechnical Desktop Study dated 27th November 2025, prepared by CEC Geotechnical

E. ENDEAVOUR ENERGY ITEMS TO BE ADDRESSED

Reason(s) for Conditions or Objection (If applicable)

- To ensure an adequate connection, the applicant will need to engage an Accredited Service Provider (ASP) of an appropriate level and class of accreditation to assess the electricity load and the proposed method of supply for the development.

- An extension or augmentation of the existing electricity distribution network may be required. Whilst there are distribution substations in the area which are likely to have some spare capacity, it is not unlimited and may not be sufficient to provide for the additional load from the proposed development.

Other factors such as the size and rating / load on the conductors and voltage drop (which can affect the quality of supply particularly with long conductor runs) etc. need to be assessed. However the extent of any works required will not be determined until the final load assessment is completed.

- Any required padmount substation/s will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling not located within a public road / reserve) with an appropriate form of property tenure as detailed in the attached copy of Endeavour Energy's 'Land Interest Guidelines for Network Connection'.

Generally it is the Level 3 Accredited Service Provider's (ASP) responsibility (engaged by the developer) to make sure substation location and design complies with Endeavour Energy's standards the suitability of access, safety clearances, fire ratings, flooding etc. If the substation does not comply with Endeavour Energy's standards, the applicant must request a dispensation.

For further information please also refer to the attached copies of Endeavour Energy's:

- o Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.

- o Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations.

Appendix DD - Infrastructure Report prepared by Erbas Revision 1 dated 14.07.2025 includes the following advice regarding whether electricity services are available and adequate for the proposed development.

3 Electrical Services

3.1 Power Infrastructure

The site's estimated maximum demand has been calculated at approximately 1000 kVA (around 1400 A at low voltage). This is a significant load for a typical commercial development and strongly suggests the likely requirement for an on-site substation. Final confirmation will depend on the local supply authority's assessment, but based on standard network design rules. Adequate space and access provisions needed to accommodate a substation on site are indicated on the architectural drawings.

The below copy of the Level 3 Plan from Appendix B - Architectural Plans shows provision for a padmount substation to the north eastern corner of the site with frontage to Moseley Street. This location may not be suitable as the restrictions for fire rating and swimming pool or substation required for padmount substation encroach the adjoining property. However with the proposed ground level building setbacks it appears a padmount substation should be able to be reasonably located on the site. There is no existing 11 kV high voltage supply that is required for a distribution substation to the Donald Street road frontage.

- Endeavour Energy's network asset design policy is generally to progressively underground all new urban developments with all new cabling / reticulation infrastructure to be of an underground construction type. Where existing overhead construction is present on or in proximity of the site, it may require undergrounding as the development proceeds.

- The low voltage service conductor and customer connection point must comply with the current 'Service and Installation Rules of NSW'.

- The electricity distribution network relies in part on the retention of appropriate building setbacks to the road frontages to allow for line route / network design options and to provide safety clearances to conductors. Particular regard needs to be had to secondary road frontages or where overhead power lines are located near side or rear boundaries where lesser building setbacks apply. The higher the voltage, the greater the safety clearance required. This is also in keeping with a policy of prudent avoidance.

The encroachment of building setbacks (including by roof structures or projections from external walls constructed with conductive materials) may transfer fault currents to the main building / dwelling. It can also result in construction works being required within the minimum safe approach distance and may require the application to Endeavour Energy for appropriate network outages eg. when erecting and dismantling scaffold, and may also be an issue for the ongoing maintenance of the building or structure.

Endeavour Energy's recommendation is that whenever reasonably possible buildings and structures be located and designed to avoid the need to work within the safe approach distances for ordinary persons eg. not having parts of the building normally accessible to persons in close proximity of the overhead power lines; the use of durable / low maintenance finishes. Alternatively, in some instances the adoption of an underground solution may be warranted ie. particularly for low voltage which can be more readily (in shorter distances) and comparatively economically be undergrounded.

As a guide, Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', Table 1 – 'Minimum easement widths', requires a minimum easement width of 9 metres for low voltage up to 22,000 volt / 22 kilovolt (kV) high voltage overhead power lines ie. 4.5 metres to both sides of the centreline of the poles / conductors. For higher voltages, the wider the required minimum easement width.

The EIS indicates the proposed building setbacks to the ground level are:

Table 9 Project Details

Project Element	Summary
Ground Level Setbacks	<p>North: 6.5m East: 6.7m (Building A2) and 8.7m (Building B) South: 8.4m West: 4.2m (Building A1) and 3.3m (Building B)</p> <p>The typical setback from the main building line above ground is 6m.</p>

The minimum required safety clearances and controls for buildings and structures (whether temporary or permanent) and working near overhead power lines must be maintained at all times. If there is any doubt whatsoever regarding the safety clearances to the overhead power lines, the applicant will need to have the safety clearances assessed by a suitably qualified electrical engineer / Accredited Service Provider (ASP).

Even if there is no issue with the safety clearances to the building or structure, consideration must be given to WorkCover (now SafeWork NSW) 'Work Near Overhead Power Lines Code of Practice 2006' eg. ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kilovolt (kV). It also includes the following requirements for work near low voltage overhead power / service lines.

TABLE 4

Approach distances for work near low voltage overhead service lines

Ordinary Persons (m)				
Hand held tools	Operation of crane or mobile plant	Handling of metal materials (Scaffolding, roofing, guttering, pipes, etc)	Handling of non-conductive materials (Timber, plywood, PVC pipes and guttering, etc)	Driving or operating vehicle
0.5	3.0	4.0	1.5	0.6

The construction of any building or structure (including fencing, signage, flag poles, hoardings etc.) whether temporary or permanent that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations'.

- Whilst there may be no restrictions in legislation that stop sensitive uses such as schools, pre-schools, day / child care centres being placed next to electricity infrastructure, prudent avoidance measures should however be implemented.

As a guide Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', Table 1 'Minimum easement widths', requires a minimum easement width of 9 metres for low voltage up to 22,000 volt / 22 kilovolt (kV) high voltage overhead power lines ie. 4.5 metres to both sides of the centreline of the poles / conductors. With the observance of these separation distances, electric and magnetic fields (EMF) should not exceed the recommended magnetic field public exposure limits.

Nonetheless the applicant may wish to commission an independent review to provide an overall assessment and the consideration and adoption of prudent avoidance principles.

- *Care must be taken to ensure that excavation activities do not infringe on or affect the integrity of the electricity distribution network.*
- *Driveways should be designed to increase the separation to the any electricity infrastructure on the road verge as much as reasonably possible.*
- *The planting of large / deep rooted trees near electricity infrastructure is opposed by Endeavour Energy. Existing trees which are of low ecological significance in proximity of electricity infrastructure should be removed and if necessary replaced by an alternative smaller planting. The landscape designer will need to ensure any planting near electricity infrastructure achieves Endeavour Energy's vegetation management requirements.*

Response_

- Refer to Endorsement Letter dated 13th August 2025, by Endeavour Energy
- Refer to Substation Design dated 20th November 2025, prepared by Acme Automated Solutions