INTEGRATED
DESIGN
GROUP
ARCHITECTURE|MASTERPLANNING|INTERIORS

DESIGN VERIFICATION STATEMENT

Wesley Mission
40 Stewart Street ERMINGTON
27 March 2026
REV. A

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SUMMARY OF PROPOSED DEVELOPMENT

The proposed development comprises:

- Site preparation and early works, including remediation and demolition of existing structures;
- Torrens title lot amalgamation of the existing four (4) lots to create one (1) lot;
- Retention of the heritage building, part of the former hospital building and other character elements;
- Construction and adaptive reuse of existing buildings for 6 x independent living unit buildings and a range of low-rise detached villas and duplex villas, delivering 218 seniors living dwellings;
- Adaptive reuse of the heritage item (Tebbutt Lodge) including conservation works and curtilage improvements with sympathetic new additions to facilitate the provision of communal facilities, communal and private outdoor open space, and wellness facilities;
- Removal of existing hardscape areas, retention of significant higher value soft landscaping, new landscaping (including tree removal) and public domain works; and
- Augmentation of physical infrastructure and utilities, as required.

The key development statistics of the development are detailed in the below table:

Key Development Statistics	
Component	**Amount**
Site Area	47061m^2
Proposed GFA	27142.21m^2
Proposed FSR	0.58:1
Proposed Car Parking	218 basement spaces 79 Villa/Duplex spaces 28 Visitor street spaces 324 total carparks
Proposed 1-bed ILU	13
Proposed 2-bed ILU	60
Proposed 2-bed + study ILU	28
Proposed 3-bed ILU (Apartment)	78
Proposed 3-bed ILU (Villa)	39
Total ILU	218
Maximum Building Height	Building C (7-storeys with two (2) basement levels) with a maximum RL of 96,514

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The Development Application is accompanied by the following documents, which demonstrate the proposal's capability to comply with relevant statutory requirements, design principles, and discipline specific provisions:

APPENDIX	PREPARED BY
A. SEARs Compliance Table	*Beam Planning*
B. Statutory Compliance Table	*Beam Planning*
C. Mitigation Measures	*Beam Planning*
D. Community Consultation Table	*Beam Planning*
E. Survey Plan	*LTS Surveyors*
F. Architectural Plans	*Integrated Design Group*
G. Architectural Design Report	*Integrated Design Group*
H. Seniors Housing Design Guide Report	*Integrated Design Group*
I. Connecting with Country Strategy	*WSP*
J. Landscape Plans	*Site Image*
K. Landscape Report	*Site Image*
L. Engagement Outcomes Report	*L.10 Collective*
M. Heritage Impact Statement	*Weir Phillips*
N. Arboricultural Impact Assessment	*Tree IQ*
O. Transport Impact Assessment	*JMT Consulting*
P. ESD Report	*E-Lab*
Q. Noise and Vibration Impact Assessment	*E-Lab*
R. Integrated Water Management Plan	*NDY*
S. Geotechnical Report	*Douglas Partners*
T. Detailed Site Investigation	*Douglas Partners*
U. Remedial Action Plan	*Douglas Partners*
V. Groundwater Impact Assessment	*Douglas Partners*
W. Report on Groundwater Monitoring	*Douglas Partners*
X. Hazardous Building Materials Survey	*Greencap*
Y. Biodiversity Development Assessment Report	*Biosis*
Z. Waste Management Plan	*Salt3*
AA. Aboriginal Cultural Heritage Due Diligence Advice	*Austral Archaeology*
BB. Accessibility Report	*Access Link*
CC. BCA Statement	*Certatude*
DD. View Impact Studies	*Urbaine Design Group*

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PARRAMATTA LOCAL ENVIRONMENT PLAN 2023

The following statement provides an outline of key clauses within Parramatta Local Environment Plan 2023.

CLAUSE	PROVISION
2.1 Land Use Zones	The site is zoned SP2 Health Services Facility. SP2 zones are identified as a prescribed zone, under Part 5 of the Housing SEPP, therefore making seniors housing permissible. Seniors housing is permissible on the site, under Section 81 of the Housing SEPP.
4.3 Height of Buildings	The site does not have a mapped maximum building height.
4.4 Floor Space Ratio	The site does not have a mapped maximum floor space ratio (FSR).
5.10 Heritage Conservation	The site contains local heritage item I165 'the R E Tebbutt Lodge' (refer to Figure 1). Whilst the entire site is subject to the heritage listing, the 'R E Tebbutt Lodge' is the eastern building on the site. Development consent is required for the demolition or alterations to any heritage items, or the erection of a building on land on which a heritage item is located. The Parramatta DCP 2023 outlines prescriptive controls relating to development on, or adjacent to heritage items.
5.21 Flood Planning	The site is not identified as being flood prone.

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STATE ENVIRONMENTAL PLANNING POLICY (HOUSING)

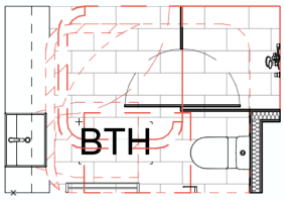
The following statement provides an assessment of the development against the outlined clauses from the State Environmental Planning Policy (Housing) under **Part 5 Housing for Seniors and People with a Disability.**

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
Division 7 Non – discretionary development standards: 108 non-discretionary development standards for independent living units – the act, s 4.15			
(2)(f)	a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 3m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site,	The proposed deep soil area is 28.25% of the site. Refer to area summary drawing 0001.	COMPLIES
(g)	at least 70% of the dwellings receive at least 2 hours of direct solar access between 9am and 3pm at mid-winter in living rooms and private open spaces	74% of proposed ILU receive 2 or more hours on direct solar access between 9am and 3pm in living rooms and private open spaces. Refer to Compliance drawings.	COMPLIES

The following statement provides an assessment of the development against the State Environmental Planning Policy (Housing) under **Schedule 4 STANDARDS CONCERNING ACCESSIBILITY AND USABILITY FOR HOSTELS AND INDEPENDENT LIVING UNITS.**

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
PART 1 STANDARDS APPLYING TO HOSTELS AND INDEPENDENT LIVING UNITS			
3 Letterboxes	(1) Letterboxes— (a) must be located on a hard standing area, and (b) must have wheelchair access by a continuous accessible path of travel from the letterbox to the relevant dwelling, and (c) must be lockable by a lock that faces a wheelchair accessible path. (3) At least 20% of the letterboxes on the site must be more than 600mm and less than 1,200mm above ground level (finished).	The proposed design provides an accessible path of travel to letter letterboxes located on a hard standing area adjacent to entries for apartments and driveways for ILUs. They are lockable by a lock that faces the accessible path and more than 20% of them are between 600-1200mm off the FFL.	COMPLIES
4 Car Parking	(1) If parking spaces attached to or integrated with a class 1 building under the Building Code of Australia are provided for use by occupants who are seniors or people with a disability, at least 1 parking space must— (a) be at least 3.2m wide, and (b) be at least 2.5m high, and (c) have a level surface with a maximum gradient of 1:40 in any direction, and (d) be capable of being widened to 3.8m without requiring structural modifications to a building. (2) If parking spaces associated with a class 1, 2 or 3 building under the Building Code of Australia are provided in a common area for use by occupants who are seniors or people with a disability, the following applies— (a) for a parking space not in a group—the parking space must comply with AS/NZS 2890.6,	The proposed design provides 3.8m clear space for parking on the driveway with a maximum gradient of 1:40. The proposed design provides parking with max gradient 1:40 and the following breakdown for Apartment parking: 15% 2890.6 spaces 50% SEPP 3.2m spaces 35% standard 2.4x5.4m spaces	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
	(b) for a group of 2–7 parking spaces— (i) at least 1 of the parking spaces must comply with AS/NZS 2890.6, and (ii) 50% of the parking spaces must— (A) comply with AS/NZS 2890.6, or (B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction, (c) for a group of 8 or more parking spaces— (i) at least 15% of the parking spaces must comply with AS/NZS 2890.6, and (ii) at least 50% of the parking spaces must— (A) comply with AS/NZS 2890.6, or (B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction. (4) At least 5% of any visitor parking spaces must comply with AS/NZS 2890.6. (5) A parking space required by this section to comply with AS/NZS 2890.6, other than a visitor parking space, is not required to include the international symbol of access. (6) If multiple parking spaces are accessible by a common access point, the access point must be secured by a power-operated garage door, vehicle gate, vehicle barrier or similar device. (7) A parking space, other than a parking space under subsection (6), must be— (a) secured by a power-operated door, or (b) capable of accommodating the installation of a power-operated door, including by having— (i) access to a power point, and (ii) an area for motor or control rods for a power-operated door.	 STANDARD CARPARKS  AS2890.6:2022 SHARED CARPARKS  SEPP SENIOR 3.2M WIDE CARPARK BAYS Basements are secure with power operated garage door.	
5 Accessible Entry	(1) The main entrance to a dwelling must have— (a) a clear opening that complies with AS 1428.1, and (b) a circulation space in front of the door and behind the door that complies with AS 1428.1.	The proposed design provides accessible access. Refer to accessibility report prepared by Access Link.	COMPLIES
6 Interiors	(1) An internal doorway must have an unobstructed opening that complies with AS 1428.1. (2) An internal corridor must have an unobstructed width of at least 1,000mm. (3) The circulation spaces in front of and behind an internal doorway in the following areas must comply with AS 1428.1 (a) a kitchen, (b) a laundry, (c) a bathroom, (d) a toilet, (e) a bedroom, (f) a living area, (g) the main area of private open space.	The proposed design provides accessible doorways into ILUs and required internal areas per AS 1428.1. All hallways are a minimum of 1000mm. Refer to accessibility report prepared by Access Link.	COMPLIES
7 Bedroom	At least one bedroom in a dwelling must have the following— (a) a clear area, not including a circulation space, sufficient to accommodate— (ii) for an independent living unit—a wardrobe and a queen-size bed, (b) a clear area around the area for the bed of at least— (i) 1,200mm at the foot of the bed, and (ii) 1,000mm on each side of the bed	The proposed design provides an accessible bedroom and associated requirements in each dwelling. Refer to accessibility report. Typical required bedroom proposed below for information:	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
			
8 Bathroom	(1) At least one bathroom in a dwelling must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling. (2) The bathroom must have the following— (a) a slip resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013, (b) a washbasin with tap ware capable of complying with AS 1428.1, (c) a shower that—complies with the requirements of AS 1428.1 (d) a wall cabinet with shelving illuminated by an illumination level of at least 300 lux, (e) a double general power outlet in an accessible location, in accordance with AS 1428.1.	Each unit has a bathroom that complies with AS1428.1 and AS 4586—2013. Detailed requirements to be documented in construction documentation phase. Refer to accessibility report prepared by access consultant.	COMPLIES
9 Toilet	(1) At least one toilet in a dwelling must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling. (2) The toilet must have the following— (a) a water closet pan— (i) in the corner of the room, and (ii) with a centreline set-out in accordance with AS 1428.1, (b) a circulation space in front of the water closet pan that is— (i) at least 1,200mm long and at least 900mm wide, and (ii) clear of door swings and fixtures, other than a toilet paper dispenser or grab rails, (c) a circulation space around the water closet pan that complies with AS 1428.1, (d) a slip resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013, (e) a wall capable of accommodating the installation of a back rest and grab rail that will comply with AS 1428.1. (3) A removable shower screen may be located in the circulation space specified in subsection (2)(c).	The proposed bathroom in all ILUs is on same level as dwelling entry and is set out to outlined requirements. 900x1200mm clearance is provided in front of the toilet with minor modifications to comply with AS1428.1. Proposed walls can accommodate the installation of back rest and grab rails, and the floor will comply with a slip resistance of P3 with specification documented during construction documentation. 	COMPLIES
10 Surfaces of Balconies and external paved areas	Balconies and external paved areas must have surfaces that are slip resistant and comply with— (a) the *Building Code of Australia,* or (b) the Standards Australia Handbook SA HB 198:2014,	Balconies and external paved areas can comply with regulations of slip resistance in the BCA and Standards handbook with specification provided in during construction documentation.	CAPABLE OF COMPLYING
11 Door hardware	(1) Door handles and hardware for all doors, including entry doors and external doors, must comply with AS 1428.1.	Door handles can comply with AS1428.1 with detail documented during construction documentation phase.	CAPABLE OF COMPLYING

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
12 Switches and Power Points	(1) Switches and power points must— (a) comply with AS 1428.1, or (b) be capable of complying with AS 1428.1 through future adaptation. (2) Subsection (1) does not apply to— (a) remote controls, or (b) power points likely to serve appliances that are not regularly moved or turned off.	Door handles can comply with AS1428.1 with detail documented during construction documentation phase.	CAPABLE OF COMPLYING
13 Private Passenger Lifts	(1) This section applies to a private passenger lift that is required by this schedule to be accessible only from inside a particular dwelling. (2) The private passenger lift must— (a) be at least 1,100mm wide and at least 1,400mm long, measured from the lift car floor, and (b) have a clear indoor landing on all floors serviced by the lift, other than the floor on which the main area of private open space is located, at least 1,540mm long and at least 2,070mm wide, and (c) have controls that comply with— (i) AS 1735.12:2020*, Lifts, escalators and moving walks, Part 12: Facilities for persons with disabilities*, published on 26 June 2020, or (ii) AS 1735.15:2021*, Lifts, escalators and moving walks, Part 15: Safety rules for the construction and installation of lifts — Special lifts for the transport of persons and goods — Vertical lifting platforms intended for use by persons with impaired mobility*, published on 23 July 2021. (3) The width of the door opening of the private passenger lift must be at least 900mm.	N/A	N/A
PART 2 ADDITIONAL STANDARDS FOR INDEPENDENT LIVING UNITS			
15 Bedroom	At least one bedroom in an independent living unit that complies with this schedule, section 7 must be located on— (a) the same floor as the entry to the unit, or (b) a floor serviced by a private passenger lift accessible only from inside the unit.	One bedroom in each proposed ILU meets both requirements.	COMPLIES
16 Living Room	(1) A living room in an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling. (2) The living room must have— (a) a circulation space that— (i) is clear of all fixtures, and (ii) has a diameter of at least 2,250mm, and (b) a telecommunications or data outlet adjacent to a general power outlet.	Each dwellings living room is on the same floor as the entry and is serviced by private passenger lift. Additionally meeting circulation requirements, and outlet requirements.	COMPLIES
17 Main Area of private open space	The main area of private open space for an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling.	The main private open space for each dwelling meets requirements as each are located on the same floor as the entry to the dwelling and are serviced by passenger lifts.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
18 Kitchen	(1) A kitchen in an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling. (2) The kitchen must have a circulation space with a diameter of at least 1,200mm between each bench top, cupboard or large appliance and each other bench top, cupboard or large appliance. (3) Each circulation space specified in subsection (2) must be capable of being increased to a diameter of 1,550mm without— (a) relocating the sink, or (b) moving a load-bearing wall, or (c) breaching another circulation requirement. (4) The kitchen must have the following fittings— (a) a bench that includes at least one work surface that is— (i) at least 800mm long, and (ii) clear of obstructions, and (iii) not in the corner of the room, (b) a lever tap set with the lever and water source that is within 300mm of the front of the bench, (c) a cooktop next to the work surface, (d) an isolating switch for the cooktop, (e) an oven that— (i) has operative elements between 450mm and 1,250mm above the finished floor level, and (ii) is next to the work surface, (f) at least one double general power outlet located within 300mm of the front of a work surface. (5) The cupboards must— (a) not be entirely located in the corner of the bench or the corner of the room, and (b) face where the user of the fixture is likely to be. (6) An overhead cupboard in the kitchen must be capable of being fitted with “D” pull cupboard handles towards the bottom of the cupboard. (7) A below-bench cupboard in the kitchen must be capable of being fitted with “D” pull cupboard handles towards the top of the cupboard. (8) The lever tap set, cooktop, isolating switch, oven and double general power outlet must— (a) not be in the corner of the bench or the corner of the room, and (b) face where the user of the fixture is likely to be. (9) Cabinetry below a work surface must be able to be easily removed to allow wheelchair access to the work surface.	Each dwellings kitchens have been proposed to achieve requirements with detail to be documented in the construction documentation.	COMPLIES
19 Laundry	(1) A laundry in an independent living unit must be located on— (a) the same floor as the entry to the dwelling, or (b) a floor serviced by a private passenger lift accessible only from inside the dwelling. (2) The laundry must have the following— (a) a circulation space that complies with AS 1428.1 at the approach to any external doors, (b) an appropriate space for an automatic washing machine and a clothes dryer, (c) a clear space in front of each appliance of at least 1,550mm, (d) a slip resistant floor surface that achieves a minimum rating of P3 in accordance with AS 4586—2013,	Each dwellings laundry meets requirements with each on same level as entry and additionally meeting measurement clearances, with slip resistance to achieve requirements with detail to be documented in the construction documentation.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
	(e) a continuous accessible path of travel to the main area of private open space or any clothes line provided for the dwelling. (3) The space specified in subsection (2)(c) may overlap with a door swing or the circulation space for a door. (4) For laundry facilities in a cupboard, the cupboard must be capable of being fitted with "D" pull cupboard handles in the following locations— (a) for below-bench cupboards—towards the top, (b) for overhead cupboards—towards the bottom, (c) for floor-to-ceiling doors—between 900mm and 1,100mm above the finished floor level.		
20 Linen Storage	An independent living unit must have a floor-to-ceiling linen storage cupboard that— (a) is at least 600mm wide, and (b) has adjustable shelving.	The proposed dwellings provide space for required linen storage space.	COMPLIES
21 Lift Access in Multi storey Buildings	An independent living unit on a storey above the ground storey must be accessible by a lift that complies with the *Building Code of Australia*, Volume 1, Part E3.	All units above the ground storey are accessible by a compliant lift.	COMPLIES
22 Garbage and Recycling	A garbage storage area and a recycling storage area provided for an independent living unit must be accessible by a continuous accessible path of travel from the dwelling entrance.	Proposed villas and duplexes have been provided with individual garbage and recycling bins per dwelling and are accessible for a continuous path of travel from dwelling entrance. Proposed apartments have been provided with garbage chutes on each floor that are accessible by a continuous path of travel from dwelling entrances.	COMPLIES

STATE ENVIRONMENTAL PLANNING POLICY (HOUSING)

The following statement provides an assessment of the development against the State Environmental Planning Policy (Housing) under **Schedule 8**.

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
SCHEDULE 8 DESIGN PRINCIPLES FOR SENIORS HOUSING			
1(a) Neighbourhood amenity and streetscape	To recognize the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation.	The design proposal is for Independent Living Units, which have been design in varied typologies including standalone villas, duplexes and apartments. They have been designed in accordance with the SEPP schedule 4 requirements outlined above and the ADG.	COMPLIES
1(b)	To recognize the desirable elements of – (i) The location's current character, or (ii) For precincts undergoing transition – the future character of the location so new buildings contribute to the quality and identity of the area,	The design proposal uses housing typologies in the surrounding suburb as precedents and uses existing structures and materials on site to inform the architectural language of the development.	COMPLIES
1(c)	To complement heritage conservation areas and heritage items in the area,	R E Tebbutt Lodge is Local Heritage Item I166 in the Parramatta LEP and is located on the site. The design proposal has been developed in consultation	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
		with Heritage Consultant Weir Phillips. The design removes unsympathetic additions to the heritage item and proposes to adaptively reuse to adaptively reuse and celebrate it as a new reception and communal space. Appropriate curtilage is proved to Tebbett Lodge and inspiration for materiality and form has been used throughout the proposed design.	
1(d)	To maintain reasonable neighbourhood amenity and appropriate residential character by – (i) Providing building setbacks to reduce bulk and overshadowing, and (ii) Using building form and siting that relates to the sites land form, and (iii) Adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and (iv) Considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours,	The proposal incorporates substantial setbacks and lower scale adjacent to the boundary. Apartments have been carefully designed to orientate views and sightlines away from neighbours. Additionally boundary planting and vegetation has been used to soften the interface and avoid overlooking. The development works with the slope of the site to centralise height within minimise the visual and overshadowing effects. The proposal distributes the scale of buildings to achive transition to surrounding low density areas. There is no solar impact to eastern and southern neighbours between 9-2pm in mid winter. Western neighbours retain solar access from 11am, with new shadows in mid winter from 9-11am predominantly falling on road and carparking.	COMPLIES
1(e)	To set back the front building on the site generally in line with the existing building line,	The proposed front set back is larger than the neighboring buildings at 26m.	COMPLIES
1(f)	To include plants reasonably similar to other plants in the street,	The proposed scheme retains planting within the front setback. Planting throughout the development has been selected carefully. Refer landscape architect's documentation.	COMPLIES
1(g)	To retain, wherever reasonable, significant trees,	Higher value significant trees have been retained where possible. Refer arborists report and landscape architects documentation.	COMPLIES
1(h)	To prevent the construction of a building in a riparian zone.	N/A	N/A
2 Visual and acoustic privacy	Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and all residents of the seniors housing by – (a) Using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and (b) Ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.	Screen planting has been provided in relevant locations for reduction of noise and to increase residents' privacy and comfort. Refer to Landscape architects' drawings. Proposed design utilises buffer boundary planting and vegetation to soften the development and provide privacy for residents. The noise levels have been assessed by the Acoustic Engineer and will have acceptable noise levels in bedrooms in accordance with the controls. See Acoustic and Vibration report.	COMPLIES
3(a) Solar access and design for climate	For development involving the erection of a new building – provide residents of the building with adequate daylight in a way that does not adversely impact the amount of daylight in neighbouring buildings, and	The orientation and placement of the proposed buildings have been designed to allow for sun access during winter. Achieving over 70% solar access to living rooms and private outdoor space for 2 hours on the 21st of June (winter).	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
		There is no solar impact to eastern and southern neighbours between 9-2pm in mid winter. Western neighbours retain solar access from 11am, with new shadows in mid winter from 9-11am predominantly falling on road and carparking. Refer to shadow diagrams sheets 9100, 9101, 9102.	
3(b)	Involve site planning, dwelling design and landscape the reduces energy use and makes the best practicable use of natural ventilation, solar heating and lighting by locating the windows of living and dining areas in a northerly direction.	Cross ventilation of the ILUs are prioritized with 77% of units cross ventilated. See Compliance ventilation drawings. Northern aspect windows have been provided where possible to allow for daylighting and solar access	COMPLIES
4(a) Stormwater	Control and minimize the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-perious material, minimising the width of paths and minimising paced areas, and	Measures have been put in place to improve stormwater water quality for secondary uses. The design has been resolved with the civil engineer to control and minimise disturbance and impacts of stormwater runoff. Refer to civil documentation for detail.	COMPLIES
4(b)	Include, where practical, on-site stormwater detention or re-use for second quality water uses.	Stormwater has been designed to mitigate stormwater on site prior to release. Refer to civil documentation for detail.	COMPLIES
5(a) Crime prevention	Be designed in accordance with environmental design principles relating to crime prevention, and	The design has been developed with design principles relating to crime prevention. This includes passive surveilance for example, front entries have glazed entries and apartments and villas/duplexes have views to to street and central spine.	COMPLIES
5(b)	Provide personal property security for residents and visitors, and	The development provides access control for apartment and shared spaces. Keyed entry to Villas and Duplexes and backyards are fenced/ gated to provide personal security. CCTV proposed at the development for active surveillance, documented at construction documentation stage.	COMPLIES
5(c)	Encourage crime prevention by – (i) Site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and (ii) Providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and (iii) Providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.	Crime prevention has been encouraged through security and surveillance measures including for front entries have glazed entries to define circulation space and provide casual surveillance. View from apartment to pedestrian street and lobbies allow for passive surveillance.	COMPLIES
6(a) Accessibility	Have obvious and safe pedestrian links from the site that provide access to transport services or local facilities, and	The proposed pathways are accessible allowing for safe pedestrian links throughout the site to Stewart St, communal facilities, reception and the cafe. Refer to access report. All proposed entries and shared spaces are accessible and provide adequate circulation. Refer to the accessibility report.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
		All communal open spaces are accessible.	
6(b)	Provide safe environments for pedestrians and motorists with convenient access and parking for residents and visitors.	The design provides basement car parking spaces secure with garage doors and access control. With access from communal lifts clearly identified and accessible from all buildings. Villas and Duplexes have garages for parking. Visitor parking is located along the street within in the development, with accessible paths throughout the proposal to buildings and communal spaces.	COMPLIES
7 Waste management	Seniors housing should include waste facilities that maximise recycling by provision of appropriate facilities.	Waste and recycling space is provided in all basements with chutes from each level. Villas and Duplexes have been provided with individual waste and recycling bins per dwelling. Details referring to waste management report provided by waste management consultant.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
SCHEDULE 9 DESIGN PRINCIPLES FOR RESIDENTIAL APARTMENT DEVELOPMENT			
1 Context and neighbourhood character	(1) Good design responds and contributes to its context, which is the key natural and built features of an area, their relationship and the character they create when combined and also includes social, economic, health and environmental conditions. (2) Responding to context involves identifying the desirable elements of an area's existing or future character. (3) Well designed buildings respond to and enhance the qualities and identity of the area including the adjacent sites, streetscape and neighbourhood. (4) Consideration of local context is important for all sites, including sites in the following areas— (a) established areas, (b) areas undergoing change, (c) areas identified for change.	The proposal responds to the site's natural and built context by working with its sloping topography and adaptively reusing existing heritage and character buildings. These elements are integrated into the development to reinforce the site's identity and continuity with its surroundings. The project contributes to the evolving character of the area by delivering in-demand seniors housing, alongside community facilities and communal outdoor spaces that support social interaction, wellbeing, and active living.	COMPLIES
2 Built form and scale	(1) Good design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings. (2) Good design also achieves an appropriate built form for a site and the building's purpose in terms of the following— (a) building alignments and proportions, (b) building type, (c) building articulation, (d) the manipulation of building elements. (3) Appropriate built form— (a) defines the public domain, and (b) contributes to the character of streetscapes and parks, including their views and vistas, and	The proposal achieves an appropriate scale, bulk, and height by concentrating built form toward the centre of the site, reducing its impact on the surrounding streetscape and responding sensitively to the existing and future character of the area. The built form is carefully articulated through varied building elements, proportions, and a mix of typologies, creating a well-defined and cohesive architectural expression suited to its residential purpose. A combination of uses and a range of 1, 2, and 3-bedroom apartments across six apartment building support diverse living needs.	COMPLIES

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	(c) provides internal amenity and outlook.	The landscaped central spine connecting buildings and outdoor spaces while encouraging social interaction. Internal amenity and outlook are enhanced by optimising connection to public domain, and more broadly with views and outlook to the south toward Strathfield and Sydney Olympic Park, ensuring high-quality living environments for residents.	
3 Density	(1) Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context. (2) Appropriate densities are consistent with the area's existing or projected population. (3) Appropriate densities are sustained by the following— (a) existing or proposed infrastructure, (b) public transport, (c) access to jobs, (d) community facilities, (e) the environment.	The proposal delivers a high level of residential amenity through a considered density that responds to the site's context. Building height and bulk are concentrated centrally, with 7-storey buildings transitioning to 3–4 storey buildings around site edges, ensuring a sensitive interface with neighbours while maintaining internal amenity. The density is supported by existing infrastructure and strong public transport accessibility. The site is well serviced by regular bus routes along Stewart Street, with stops located directly adjacent on both sides of the street. These connections provide access to Carlingford, Eastwood, West Ryde, Parramatta, and Sydney Olympic Park, linking residents to employment, town center amenities, health services, and wider transport networks. Proximity to community facilities, services, and open space further supports the proposed density, contributing to a well-connected and liveable residential environment.	COMPLIES
4 Sustainability	(1) Good design combines positive environmental, social and economic outcomes. (2) Good sustainable design includes— (a) use of natural cross ventilation and sunlight for the amenity and liveability of residents, and (b) passive thermal design for ventilation, heating and cooling, which reduces reliance on technology and operation costs. (3) Good sustainable design also includes the following— (a) recycling and reuse of materials and waste, (b) use of sustainable materials, (c) deep soil zones for groundwater recharge and vegetation.	The proposal integrates environmental, social, and economic sustainability outcomes through a considered and efficient design approach. Existing buildings are adaptively reused where possible, reducing material waste and retaining embodied energy. A strong emphasis is placed on passive design principles, with over 70% of apartments achieving compliant solar access and 65% naturally cross-ventilated, enhancing resident amenity while reducing reliance on mechanical systems for heating and cooling. Sustainable material selection and construction practices further support environmental performance, alongside deep soil zones comprising 28% of the site to enable groundwater recharge and support vegetation. Integrated stormwater management strategies address water sensitivity on site, contributing to a resilient and sustainable development.	COMPLIES
5 Landscape	(1) Good design recognises that landscape and buildings operate together as an integrated and sustainable system, resulting in development with good amenity. (2) A positive image and contextual fit of well designed development is achieved by contributing to the landscape character of the streetscape and neighbourhood. (3) Good landscape design enhances the development's environmental performance by retaining positive natural features that contribute to the following—	The landscape design prepared by Site Image creates a cohesive and sustainable development, with usable communal open spaces that enhance amenity and contribute to neighbourhood character. Existing natural trees are retained where possible to retain the lush character on site. Deep soil zones and stormwater strategies are priortised to improve environmental performance.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
	(a) the local context, (b) co-ordinating water and soil management, (c) solar access, (d) micro-climate, (e) tree canopy, (f) habitat values, (g) preserving green networks. (4) Good landscape design optimises the following— (a) usability, (b) privacy and opportunities for social interaction, (c) equitable access, (d) respect for neighbours' amenity. (5) Good landscape design provides for practical establishment and long term management.		
6 Amenity	(1) Good design positively influences internal and external amenity for residents and neighbours. (2) Good amenity contributes to positive living environments and resident well-being. (3) Good amenity combines the following— (a) appropriate room dimensions and shapes, (b) access to sunlight, (c) natural ventilation, (d) outlook, (e) visual and acoustic privacy, (f) storage, (g) indoor and outdoor space, (h) efficient layouts and service areas, (i) ease of access for all age groups and degrees of mobility.	The apartments have been designed with efficient floor plates that meet the ADG requirements. The variety of unit types ranging from 1bed-3beds provide units with good amenity for seniors with diverse needs.	
7 Safety	(1) Good design optimises safety and security within the development and the public domain. (2) Good design provides for quality public and private spaces that are clearly defined and fit for the intended purpose. (3) Opportunities to maximise passive surveillance of public and communal areas promote safety. (4) A positive relationship between public and private spaces is achieved through clearly defined secure access points and well lit and visible areas that are easily maintained and appropriate to the location and purpose.	The development has been designed to optimize passive surveillance and create a sense of safety and security within the community. The central communal spine located in the middle of the site is close to apartments and apartment. The transition from public to private is created with screening planning to define distinct zones.	
8 Housing diversity and social interaction	(1) Good design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets. (2) Well designed residential apartment development responds to social context by providing housing and facilities to suit the existing and future social mix. (3) Good design involves practical and flexible features, including— (a) different types of communal spaces for a broad range of people, and (b) opportunities for social interaction among residents.	The apartment buildings have been designed with a unit mix that allows a diversity of housing. The units are generously planned to allow for seniors downsizing from house to an apartment within proposed development. Apartments have been designed to SEPP schedule 4 meeting accessible requirements for Seniors to allow for aging in place.	
9 Aesthetics	(1) Good design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure.	The proposal achieves a well-proportioned and balanced built form, with articulation that reflects the internal layout and structure of the buildings. A considered composition of elements ensures an	

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	(2) Good design uses a variety of materials, colours and textures. (3) The visual appearance of well designed residential apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.	appropriate scale and cohesive architectural expression. A curated palette of materials, colours, and developed in consultation with heritage and Indigenous consultants responds to the site's context and exisiting identity. The buildings sit sensitively within the surrounding environment, enhancing the existing character of the site while contributing positively to the evolving suburb.	

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SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
14.0 DESIGN PRINCIPLES FOR INDEPENDENT LIVING FOR LOW DENSITY			
14.1.3 **Neighbourhood amenity and streetscape**	Introduce a high standard of design quality to the neighbourhood.	Villa and duplex typologies are varied and sit within a streetscape with individual entries and generous front and rear yards. They fit within the context and character of the surrounding area. Pedestrian paths activate the street edge and guide residents to communal landscaped areas.	COMPLIES
14.2.2 **Visual and acoustic privacy**	Provide generous landscape buffers for screening and acoustic privacy.	Refer to landscape architects' documentation for details.	COMPLIES
14.3.2 Solar access and design for climate	The design and location of windows and shading should respond to the building orientation, site constraints or opportunities in order to maximise good solar access and meaningful cross ventilation.	The villas and duplexes have been designed with courtyards and oriented around the site to maximise solar access and cross ventilation. 79% of low-density typologies receive 2 or more hours of sun to living and POS on the 21st of June and 100% of them are cross ventilated.	COMPLIES
14.3.3 Solar access and design for climate	Provide natural, passive ventilation, well insulated building envelope, and avoid using dark roof colours to reduce heat absorbance.	All proposed building roofs will comply Section J and BASIX requirements. Light colored roofs have been utilised.	COMPLIES
14.3.4 Solar access and design for climate	Consider the use of overhangs, eaves, awnings, pergolas or verandahs to provide shading to reduce heat gain in summer.	Eaves and pergolas have been designed to provide shading.	COMPLIES
14.4.6 Stormwater	Provide grates and drainage pits away from pedestrian pathways.	Grates and drains have been proposed away from pedestrian paths where possible. Refer to civil documentation for detail.	COMPLIES
14.4.7 Stormwater	Manage stormwater with landscape design and gentle gradients of hard surfaces.	A site wide stormwater strategy has been designed. Refer to civil documentation for detail.	COMPLIES
14.5.4 Accessibility	Meet the required accessibility standards with compliant but non-institutional design solutions.	ILUs have been designed to meet SEPP Schedule 4 standards.	COMPLIES
14.5.5 Accessibility	Integrate accessible design requirements with public access and pedestrian pathways for all, and not create the duality of 'us and them' access routes.	All paths through the site are accessible and integrated within landscape design.	COMPLIES

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14.6.4 Waste management	Provide appropriately sized disposal points that can accommodate bins for the various waste types including recyclables.	Villas and Duplexes have been provided with individual bins per dwelling. Details referring to waste management report provided by waste management consultant.	COMPLIES
14.6.5 Waste management	Ensure that waste collection points are safely located away from resident areas, should be screened, easy to access and preferably covered.	Bins are located on a hardstand screened from public areas. Refer to waste management report for waste collection strategy.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
16.0 DESIGN PRINCIPLES FOR INDEPENDENT LIVING FOR HIGH DENSITY			
16.1.3 **Neighbourhood amenity and streetscape**	The design should enhance the streetscape and proudly integrate into the existing context.	The proposal has a generous 26m front set back for new buildings, integrating into existing context. The higher scale of the project is centralised to site, utilizing low density typologies to transition to western, eastern and southern neighbours.	COMPLIES
16.1.4 **Neighbourhood amenity and streetscape**	Provide a development that embodies design excellence to uplift the future attributes of the local area.	The proposal embodies design excellence and positively enhances internal streetscape, whilst maintaining significant setback to Stewart St. The development uplifts the local area by providing a high quality design and accommodation of 218 ILUs for Seniors Living.	COMPLIES
16.1.5 **Neighbourhood amenity and streetscape**	Introduce new landscaping and shade trees.	Higher value mature trees have been retained where possible and the landscape has been designed to introduce new trees and meaningful landscaped areas. Refer arborists report and landscape architects' documentation.	COMPLIES
16.3.3 Stormwater	Provide opportunities to increase the catchment and/or absorption of stormwater with systems such as vegetated swales, sediment basins, detention pits and porous landscape paving.	The design has been resolved with the civil engineer to increase catchment and absorption of stormwater. Refer to civil and landscape architects documentation for detail.	COMPLIES
16.3.4 Stormwater	Maximise areas for deep soil landscape so that plants can mature into dense stormwater catchment areas and absorb ground water.	Deep soil areas have been prioritised with 28% of sites area as deep soil. For planting detail of these areas refer to landscape architects and civil engineers documentation.	COMPLIES
16.4.4 Crime prevention	Facilitate opportunities for casual passive surveillance in multistorey independent living buildings with views from balconies to public areas below.	Balustrade design for apartment buildings provides privacy from public domain while maintaining visual connection and passive surveillance.	COMPLIES
16.4.5 Crime prevention	Provide well lit pathways, thresholds and transitions between inside and outside and at property boundaries.	Can comply to be detailed in detail documentation.	CAN COMPLY
16.4.6 Crime prevention	Install movement sensor lighting.	Can comply to be detailed in detail documentation.	CAN COMPLY
16.5.5 Accessibility	Arrange independent living units on each floor with clear sightlines to and from lifts. Manage corridor lengths and cluster groups of units around a common core.	Apartments are clustered around common core. Lifts can accommodate stretcher. Doors have sufficient clearances see accessibility report for details.	COMPLIES

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	Number of units which are accessed by each lift core may need to suit the provision of care and serviceability for staff and carers. Lifts need to be sized to accommodate mobility equipment and also ambulance stretcher. Articulate corridors with indents at unit thresholds to allow residents to personalise their own entries and for wheelchairs and walkers to park.		
16.6.4 Waste management	Provide appropriately sized disposal points that can accommodate bins for the various waste types including recyclables.	Each apartment building has a waste chute with separate rubbish and recycling with is stored basement garbage holding room.	
16.6.5 Waste management	Ensure that waste collection points are safely located away from resident areas, are covered and easily accessible.	Waste is deposited in chutes on each level in each apartment building. Waste collection rooms are in basements away from resident areas.	COMPLIES
16.7.1 Entrances	A single main lobby with a reception and concierge desk is common in independent living unit developments as a point of contact and provides security. The entrance lobby facilitates social interaction between residents as well as staff. Mailboxes and parcel deliveries should be located near the entry. Mailboxes require a protected, secure, covered area, preferably indoors, yet close to the road, and must be wheelchair accessible. Deliveries of supermarket orders and other goods can be managed through the concierge as a drop-off or security check-in point for visitors entering the building. Lifts and lift lobbies should be clearly visible and easy to locate.	Mailboxes are located adjacent to lobbies. Lobbies are clearly defined with awnings and glazed doors.	COMPLIES
16.8.2 Basement access and carparking	Ease of entry should be supported with a level stopping point for access to intercom and secure access at the security threshold. Clear sightlines are required or separate driveways for each direction. Paths for pedestrian access to and from basement carpark must provide safe access away from vehicle movements.	Intercom proposed at basement entries. Clear sightlines into and out of basement and pedestrian access to basement is separate from traffic.	CAN COMPLY/ COMPLIES
16.8.3 Basement access and carparking	Increasingly, resident car use is expected to become a combination of privately owned cars, share cars owned by the development, or a concierge car service, with or without a driver. Car parking should be designed to be flexible to meet the changing needs into the future. The amount of disabled car parking may increase with ageing in place becoming a common scenario. Resident carparking should be designed to meet future need of electric vehicles with easy-to-reach car charging points.	50% of parks are 3200mm wide and 15% of parks are accessible as per SEPP requirements with allows for aging in place and decreasing mobility. The design allows for future need of electrical vehicles with easy to reach car charging points.	COMPLIES

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PART 3 SITING THE DEVELOPMENT			
Objective 3A-1 **Site Analysis**	Site analysis illustrates that design decisions have been based on opportunities and constraints of the site conditions and their relationship to the surrounding context	Location plan and site analysis diagram have been provided to respond to the site opportunities and constraints. Referring to site analysis drawings for details.	COMPLIES
Objective 3B-1 **Orientation**	Building types and layouts respond to the streetscape and site while optimising solar access within the development	Buildings have been oriented around the site to respond to existing buildings, create public open space and connect to the new road network within the site to optimize solar access and create a dynamic streetscape within the development.	COMPLIES
Objective 3B-2 **Orientation**	Overshadowing of neighbouring properties is minimised during mid-winter	Proposed design with reasonable setbacks utilises buffer boundary planting and vegetation to soften the development and provide privacy for residents. The development works with the slope of the site to centralise height within minimise the visual and overshadowing effects. The proposal distributes the scale of buildings to achive transition to surrounding low density areas. There is no solar impact to eastern and southern neighbours between 9-2pm in mid winter. Western neighbours retain solar access from 11am, with new shadows in mid winter from 9-11am predominantly falling on road and carparking.	COMPLIES
Objective 3C-1 **Public Domain Interface**	Transition between private and public domain is achieved without compromising safety and security	The central spine, pedestrian pathways and community buildings form the public domain within the site. Screen and buffer planting provide privacy and delineate public space from private dwellings. Villas and Duplexes have individual entries off the loop roads within the site. Apartments have secure access to dwellings from basement carparks or lobbies off the pedestrian paths throughout the site.	COMPLIES
Objective 3C-2 **Public Domain Interface**	Amenity of the public domain is retained and enhanced	The proposed design greatly enhances the public domain through the creation of a central spine off the community building, between the apartment buildings. The landscaped pedestrian paths and activated street edge enhances street interface.	COMPLIES
Objective 3D-1 **Communal and public open space**	An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping	Buildings have been placed around the site to create a generous central spine which is activated with landscaping, pathways and breakout gathering areas. The landscape softens the building edges around the development. The street edge is activated with landscaped areas and communal open space providing amenity for residents in multiple areas around the site. Minimization of carparking with underground parking fitting under the apartment buildings and visitor spots parallel to the road integrated within landscape design.	COMPLIES

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Objective 3D-2 **Communal and public open space**	Communal open space is designed to allow for a range of activities, respond to site conditions and be attractive and inviting	The large, lush site has multiple public open spaces. The pedestrian paths direct users towards the central spine and landscaped buffer along Stewart St. Outdoor seats and breakout spaces adjacent to the pedestrian interface provide rest spots along the journey. The various spaces of gathering areas with sun and shade options allow for a range of activates. The landscaped central spine is an inviting public open space housing a range of activities providing great amenity for users of all ages. Refer to landscape masterplan prepared by Landscape Architect for details.	COMPLIES
Objective 3D-3 **Communal and public open space**	Communal open space is designed to maximise safety	Open space is provided set back from the street allowing quiet safe spaces. Both Traffic and Landscaping consultants have provided buffers from vehicular traffic to promote pedestrian safety.	COMPLIES
Objective 3D- 4 **Communal and public open space**	Public open space, where provided, is responsive to the existing pattern and uses of the neighbourhood	Retaining existing connection and landscape buffer to Stewart St, the proposed preserves the existing patterns on the site informed from the heritage item and uses of neighbourhood.	COMPLIES
Objective 3E-1 **Deep soil zones**	Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality	Deep soil zones are provided open communal spaces. Refer to landscape documentation.	COMPLIES
Objective 3F-1 **Visual Privacy**	Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy	The proposed development has larger setbacks to boundaries than the current structures on site. In addition to boundary separation, visual privacy is achieved thorough substantial separation between apartment buildings on the site through angled building orientation, landscape design, and careful apartment planning. Due to the topography on the site and existing mature vegetation, the apartment buildings are angled in orientation to each other. This orientation allows for increased landscaping area which open onto mature vegetation, and allow for larger landscape buffers between buildings (rather than straight parallel walls). This arrangement also reduces the impact of building massing on the streetscape, allowing increased landscape and canopy planting along the street to improve the pedestrian experience. However, because of this orientation there are three locations (internal to the masterplan) where the building separation is not compliant with the ADG requirements for separation (highlighted in RED). These are only for a small section of the buildings at their closest point. We note that these buildings then achieve separation as they angle outwards. We also note that this non-compliance is mitigated in the design through orientation of units, the adjacent landscaping including large	PARTIALLY COMPLIES

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		mature trees, and access to generous expansive views.	
			
Objective 3F-2 **Visual Privacy**	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	Proposed building has accommodated for retention of privacy with separation and privacy screens when necessary. Due to the angle of buildings sunlight to apartments achieves the minimum ADG requirements	COMPLIES
Objective 3G-1 **Pedestrian Access and Entries**	Building entries and pedestrian access connects to and addresses the public domain	There are various pedestrian access points to buildings throughout the site connecting with the public domain. Buildings F, C and D E have entries off the central spine. Buildings A, C, D and E have southern entries off the activated internal street. Buildings F and B have northern entries off the landscaped buffer to Stewart St. All pedestrian paths have good access to the public domain. Building entries for area pedestrian network links each building to the public domain with pathways through the landscaped Refer to Site Plan for details.	COMPLIES
Objective 3G-2 **Pedestrian Access and Entries**	Access, entries and pathways are accessible and easy to identify	The Pedestrian network throughout the site is accessible. Refer to access report prepared by access consultant. Entries off pathways are clearly identifiable with landscape markers, awnings and glazed doors. Material finishes for each building make them clearly identifiable.	COMPLIES

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Objective 3G-3 **Pedestrian Access and Entries**	Large sites provide pedestrian links for access to streets and connection to destinations	The pedestrian links through the site to Stewart St connects dwellings, communal open space, and is activated by landscape strategies.	COMPLIES
Objective 3H-1 **Vehicle Access**	Vehicle access points are designed and located to achieve safety, minimise conflicts between pedestrians and vehicles and create high quality streetscapes	The Proposed basement carpark is integrated into the building's façades. Hidden with a podium style façade incorporating hard and soft landscaping, resident lobbies and minmised further by its position only viewed from internal vehicular traffic to the south of the site.	COMPLIES
Objective 3J-1 **Bicycle and car parking**	Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas	The car parking numbers have been confirmed by traffic engineer and are compliant with the required amount of parking for the proposed development. Refer to Overall Plans Basement 1 (0300), Basement 2 (0301) and Lower Ground (0302) for details.	COMPLIES
Objective 3J-2 **Bicycle and car parking**	Parking and facilities are provided for other modes of transport	Bike parks have been allowed for.	COMPLIES
Objective 3J-3 **Bicycle and car parking**	Car park design and access is safe and secure	The design provides basement car parking spaces, secure with garage doors and access control. With access from communal lifts clearly identified and accessible from pedestrian paths and buildings upper levels.	COMPLIES
Objective 3J-4 **Bicycle and car parking**	Visual and environmental impacts of underground car parking are minimised	The proposed basement carparks are double loaded where possible following a clear gridded plan for efficiency and easy of use. The design utilizes the sites slope and road network to set up the finish basement level to minimize excavation and environmental impact. The main basement carpark connecting building C, D, E and F utilises split levels to work with slope. Hidden with a podium style façade incorporating hard and soft landscaping, resident lobbies and minmised further by its position only viewed from internal vehicular traffic to the south of the site. Refer to Overall Plans Basement 1 (0300), Basement 2 (0301) and Lower Ground (0302) for details.	COMPLIES
Objective 3J-5 **Bicycle and car parking**	Visual and environmental impacts of on-grade car parking are minimised	Visitor carking is located on grade, parallel to the road and integrated into landscape design to minimize visual impact.	COMPLIES
Objective 3J-6 **Bicycle and car parking**	Visual and environmental impacts of above ground enclosed car parking are minimised	N/A	N/A

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PART 4 DESIGNING THE BUILDING			
Objective 4A-1 **Solar and daylight access**	To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space	74% of apartment living rooms and POS in proposed buildings receive a minimum of 2 hours direct sunlight between 9 am and 3 pm in mid winter. Refer to compliance diagram for details. We note that the design criteria for number of units not achieving any sunlight between 9 am and 3 pm in mid-winter is maximum 15% and the proposal achieves 16.76%, however ADG Objective 4A-1 Design Guidance does state: *Achieving the design criteria may not be possible on some sites. This includes:* • *on south facing sloping sites* • *where significant views are oriented away from the desired aspect for direct sunlight* Both of these conditions are applicable to this proposal. Floor plans show how units are designed to both access significant views to south, but also open onto landscape spaces to improve amenity for units.	COMPLIES
Objective 4A-2 **Solar and daylight access**	Daylight access is maximised where sunlight is limited	Living spaces face the east, west or north where possible. Additionally, light coloured internal materials amplify light for south facing apartments.	COMPLIES
Objective 4A-3 **Solar and daylight access**	Design incorporates shading and glare control, particularly for warmer months	Deep balconies and shading pergolas have been provided for northern facades shading living spaces during summer months.	COMPLIES
Objective 4B-1 **Natural Ventilation**	All habitable rooms are naturally ventilated	All habitable rooms are naturally ventilated	COMPLIES
Objective 4B-2 **Natural Ventilation**	The layout and design of single aspect apartments maximises natural ventilation	The units design prioritise cross ventilation design. Refer to compliance drawings for details.	COMPLIES
Objective 4B-3 **Natural Ventilation**	The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents	Cross ventilation of the unit is prioritized with 63% of units cross ventilated. Refer to compliance diagram for details.	COMPLIES
Objective 4C-1 **Ceiling Heights**	Ceiling height achieves sufficient natural ventilation and daylight access	Generally 2700mm for habitable rooms.	COMPLIES
Objective 4C-2 **Ceiling Heights**	Ceiling height increases the sense of space in apartments and provides for well proportioned rooms	Ceiling heights meet requirements for a comfortable unit. With living spaces prioritized with highest ceiling.	COMPLIES
Objective 4C-3 **Ceiling Heights**	Ceiling heights contribute to the flexibility of building use over the life of the building	Given the location of the proposed development future adaptation or reuse for alternative ground floor uses such as retail or commercial are unlikely. With in this Seniors living development, resident community spaces, such as the proposed wellness centre	COMPLIES

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		have been incorporated into the proposed building and ground floor height, confirming its flexibility for appropriate alternate use within a Seniors Living development.	
Objective 4D-1 Apartment size and Layout	The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity	Unit planning provides greater than minimum internal areas where possible to create generous apartments. Balconies and living rooms meet ADG minimum requirements.	COMPLIES
Objective 4D-2 Apartment size and layout	Environmental performance of the apartment is maximised	Living and bedrooms are located on external face of the building, open plan single aspect living, dining, kitchens have a depth of less than 8m.	COMPLIES
Objective 4D-3 Apartment Size and Layout	Apartment layouts are designed to accommodate a variety of household activities and needs	Each dwelling meets minimum requirements for each room and associated activity. Refer to Precinct Plans and Typical Building Floor Plans for layouts.	COMPLIES
Objective 4E-1 Private open space and balconies	Apartments provide appropriately sized private open space and balconies to enhance residential amenity	Each dwelling meets minimum requirements for private open space. Refer to compliance diagrams.	COMPLIES
Objective 4E-2 Private open space and balconies	Primary private open space and balconies are appropriately located to enhance liveability for residents	Private open spaces are located to maximise solar access and are off living spaces for each unit. Refer to Precinct Plans and Typical Building Floor Plans for layouts.	COMPLIES
Objective 4E-3 Private open space and balconies	Private open space and balcony design is integrated into and contributes to the overall architectural form and detail of the building	The private open spaces and balconies provide articulation to the façade enhancing the building form. Referring to elevation drawings for details.	COMPLIES
Objective 4E-4 Private open space and balconies	Private open space and balcony design maximises safety	Balcony design over the central communal open space allows for passive surveillance. With balustrade materiality selected to enhance connection whilst providing privacy from below. Referring to elevation drawings for details.	COMPLIES
Objective 4F-1 Common circulation and spaces	Common circulation spaces achieve good amenity and properly service the number of apartments	The buildings meet requirements for a maximum of 8 apartments off one circulation point. Building A has 5 apartments per level, buildings B, C, D, and E have 6 apartments per level and Building F has 8 apartments per level.	COMPLIES
Objective 4F-2 Common circulation and spaces	Common circulation spaces promote safety and provide for social interaction between residents	Efficient corridors have been designed to minimise long corridors creating direct connection to entryways and lift core. Refer to Precinct Plans and Typical Building Floor Plans for layouts.	COMPLIES

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Objective 4G-1 **Storage**	Adequate, well-designed storage is provided in each apartment	Each apartment meets at least 50% of the required storage with the remainder located in the secure basements. See compliance drawings for details.	COMPLIES
Objective 4G-2 **Storage**	Additional storage is conveniently located, accessible and nominated for individual apartments	Additional storage is accessible in the basement carpark with lift access. Where the basement is secure.	COMPLIES
Objective 4H-1 **Acoustic Privacy**	Noise transfer is minimised through the siting of buildings and building layout	Noise transfer is minimized with the design of the units. With service rooms located towards common circulation spaces and in basements. Sufficient separation between buildings and landscaping aims to reduce noise between proposed buildings.	COMPLIES
Objective 4H-2 **Acoustic Privacy**	Noise impacts are mitigated within apartments through layout and acoustic treatments	Apartment layouts are designed by grouping functions of room to assist in minimizing acoustic interference.	COMPLIES
Objective 4J-1 **Noise and Pollution**	In noisy or hostile environments the impacts of external noise and pollution are minimised through the careful siting and layout of buildings	Buildings have adequate separation and dwellings are buffered by balcony spaces. Additional landscaping down the central spine provides a buffer to external noise.	COMPLIES
Objective 4J-2 **Noise and Pollution**	Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission	The proposed development retains the mature tree buffer to classified road Stewart St. Proposed buildings sit a minimum of 25m from northern boundary shielding noise from outside the site.	COMPLIES
Objective 4K-1 **Apartment Mix**	A range of apartment types and sizes is provided to cater for different household types now and into the future	The range of apartments types allows for residents with differing needs. With 1 – 3 bedrooms provided in varying layouts. Refer to Precinct Plans and Typical Building Floor Plans for layouts.	COMPLIES
Objective 4K-2 **Apartment Mix**	The apartment mix is distributed to suitable locations within the building	The apartment mix is distributed across the site with each building having varied types to cater to residents with different needs. Refer to floor plans for details.	COMPLIES
Objective 4L-1 **Ground Floor Apartments**	Street frontage activity is maximised where ground floor apartments are located	The pedestrian walkway along the central spine acts as the street frontage within the site. Ground floor units have larger private gardens with landscaped buffers to pathways that activate to the ground floor. Referring to drawing Precinct Plans for details.	COMPLIES
Objective 4L-2 **Ground Floor Apartments**	Design of ground floor apartments delivers amenity and safety for residents	Ground floor units facing the public open space have sufficient landscaped buffer to balance security and amenity. Referring to drawing Precinct Plans for details.	COMPLIES
Objective 4M-1 **Facades**	Building facades provide visual interest along the street while respecting the character of the local area	Articulation of materials and balconies provides visual interest to the building. The use of brick as the primary material fits within the character of the surrounding area. The colour palette is derived from the existing structures on site and	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
		the 6 Durug seasons allows for differentiation of buildings and clear wayfinding. Referring to elevation drawings for details.	
Objective 4M-2 **Facades**	Building functions are expressed by the facade	Building functions are distinct on the façade with balconies indicating communal spaces in the dwellings whilst windows indicate bedrooms. Building entries are expressed with awnings and are identifiable from the central path. Referring to elevation drawings for details.	COMPLIES
Objective 4N-1 **Roof design**	Roof treatments are integrated into the building design and positively respond to the street	Roof design with low roof angles allows for minimization of the roofs visual impact. Parapet walls conceal roof and plant and create visual interest along the street. Referring to elevation drawings for details.	COMPLIES
Objective 4N-2 **Roof design**	Opportunities to use roof space for residential accommodation and open space are maximised	N/A	N/A
Objective 4N-3 **Roof design**	Roof design incorporates sustainability features	Roofs are light coloured and insulated minimizing heat gain. Solar panels to be documented at later stage to maximise energy efficiency.	COMPLIES
Objective 4O-1 **Landscape Design**	Landscape design is viable and sustainable	Refer to landscape design drawings.	COMPLIES
Objective 4O-2 **Landscape Design**	Landscape design contributes to the streetscape and amenity	Landscape design is sympathetic to the communal open space minimizing heat with shade and amplifying pedestrian focused design.	COMPLIES
Objective 4P-1 **Landscape on Structures**	Appropriate soil profiles are provided	Detailed landscape design to provided at a later stage.	n/a
Objective 4P-2 **Landscape on Structures**	Plant growth is optimised with appropriate selection and maintenance	Detailed landscape design to provided at a later stage.	n/a
Objective 4P-3 **Landscape on Structures**	Planting on structures contributes to the quality and amenity of communal and public open spaces	Refer to landscape design drawings.	COMPLIES
Objective 4Q-1 **Universal Design**	Universal design features are included in apartment design to promote flexible housing for all community members	Design to comply with Schedule 4 of the Housing SEPP. Referring to typical floor plans for compliance clearances.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
Objective 4Q-2 **Universal Design**	A variety of apartments with adaptable designs are provided	3200 wide parking spaces make up 50% if carparks in line with SEPP. Structure is minimized on internal floor plates to allow for adaptability. Referring to overall plans for basements and precinct plans for internal layouts.	COMPLIES
Objective 4Q-3 **Universal Design**	Apartment layouts are flexible and accommodate a range of lifestyle needs	Open plan layouts and flexible spare bedrooms allow to adaptability for future use. Referring to drawing precinct plans for details.	COMPLIES
Objective 4R-1 **Adaptive Reuse**	New additions to existing buildings are contemporary and complementary and enhance an area's identity and sense of place	Proposal removes unsympathetic additions to Tebbutt Lodge and provides sufficient curtilage to new buildings with larger apartments set behind heritage item.	COMPLIES
Objective 4R-2 **Adaptive Reuse**	Adapted buildings provide residential amenity while not precluding future adaptive reuse	Adapted Tebbutt Lodge house provides amenity for the development locating communal and staff areas in heritage house. Retaining as much of original fabric internally as possible does not preclude future adaption.	COMPLIES
Objective 4T-1 **Awnings and Signage**	Awnings are well located and complement and integrate with the building design	Entry awnings provide amenity for rain and distinct entry ways. Referring to elevation drawings 1100 for details.	COMPLIES
Objective 4T-2 **Awnings and Signage**	Signage responds to the context and desired streetscape character	Signage proposed at front entry, detail to be provided in construction documentation.	CAN COMPLY
Objective 4U-1 **Energy Efficiency**	Development incorporates passive environmental design	Good solar access is provided in the proposed with each living space and private open space facing north where possible.	COMPLIES
Objective 4U-2 **Energy Efficiency**	Development incorporates passive solar design to optimise heat storage in winter and reduce heat transfer in summer	Awnings, pergolas and shading are used where required reduce heat loads for direct summer sun. All proposed building will comply Section J and BASIX requirements.	COMPLIES
Objective 4U-3 **Energy Efficiency**	Adequate natural ventilation minimises the need for mechanical ventilation	Adequate natural ventilation is provided in all apartments with operable windows in habitable rooms. Referring to drawing precinct plans for details.	COMPLIES
Objective 4V-1 **Water Management and conservation**	Potable water use is minimised	Refer to civil engineers drawings for detail. With detail design at the next stage.	COMPLIES
Objective 4V-2 **Water Management and conservation**	Urban stormwater is treated on site before being discharged to receiving waters	Water is collection and managed on site before discharging. With integration of civil pits, and OSD tanks. Refer to civil engineers drawings for detail. With detail design at the next stage.	COMPLIES
Objective 4V-3 **Water Management and conservation**	Flood management systems are integrated into site design	Water is collection and managed on site before discharging to the neighboring reserve. With integration of pits, and OSD tanks. Refer to stormwater engineers drawings for detail. With detail design at the next stage.	COMPLIES

SUB SECTION	DESIGN GUIDANCE	PROJECT RESPONSE	COMPLIANCE
Objective 4W-1 **Waste Management**	Waste storage facilities are designed to minimise impacts on the streetscape, building entry and amenity of residents	Waste storage is provided in the basement with sufficient space and ventilation.	COMPLIES
Objective 4W-2 **Waste Management**	Domestic waste is minimised by providing safe and convenient source separation and recycling	Each apartment building has a waste chute with separate rubbish and recycling with is stored basement garbage holding room.	COMPLIES
Objective 4X-1 **Building Maintenance**	Building design detail provides protection from weathering	Material selection and building design features such as deep balconies aid weather protection. Referring to elevation drawings for details.	COMPLIES
Objective 4X-2 Building Maintenance	Systems and access enable ease of maintenance	Awning windows allow for internal accessed maintenance. Service risers are located of corridors to allow for access. Referring to Precinct Plans for details.	COMPLIES
Objective 4X-3 Building Maintenance	Material selection reduces ongoing maintenance costs	Brick and metal cladding have been selected for their durability. Refer to elevation drawings for details.	COMPLIES

INTEGRATED
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DESIGN VERIFICATION

We confirm that Integrated Design Group has been engaged by Wesley Mission to prepare the architectural documentation for the proposed development application at 40 Stewart Street, ERMINGTON

The proposed development delivers 218 independent living units within Ermington, offering diverse and appropriate housing for seniors. The design prioritises the integration of high-quality communal spaces, to enhance resident amenity, support social interaction, and foster a strong sense of community.

Pursuant to the requirements of Clause 29 of the Environmental Planning and Assessment Regulation 2021, we advise;

a) The design has been directed by Andrew Elia of Integrated Design Group who is registered in accordance with the Architects Act 2003, registration number: NSW ARB #7928
b) The design quality principles set out in SEPP Housing (2021) Schedule 9 - Design principles for residential apartment development, are achieved for the proposed development.
c) The proposal has been designed in accordance with the Apartment Design Guide with clarifications as noted.

Yours faithfully,

Andrew Elia
DIRECTOR
NSW ARB #7928