

1 – 3 Alfred Street and 315 West Street, Umina

SEPP 65 Compliance Statement

Revision A, 07.03.22

SEPP No. 65 – Apartment Design Guide Schedule of Compliance

Prepared to accompany the s8.2 submitted for:

Residential Flat Building, Mixed use development.

Verification of Qualifications

Pursuant to Clause 50 (1A) of the Environmental Planning and Assessment Regulation 2000, effective from July 26 2003; I hereby declare I am a qualified designer, which means a person registered as an architect in accordance with the Architects Act 1921 as defined by Clause 3 of the Environmental Planning and Assessment Regulation 2000. I designed, or directed the design, of the residential flat development stated above and I affirm that the design achieves the design quality principles as set out in part 2 of the State environmental Planning Policy No. 65 Design Quality of Residential Flat Development.

SEPP Design Verification Statement Statement of Design

ADG Architects verifies we directed the design of the development in accordance with the design quality principles set out in Part 2 of State Environmental Planning Policy No. 65 – Apartment Design Guide. This involved design management and input into the architectural outcome, architectural drawings (dated 09.03.22, REV A, A000 – A110) and documents in line with Clause 50 (1AB) of the Environmental Planning and Assessment Regulation 2000 and the Draft SEPP 65 (Amendment No 3).

The assessment of the proposal is made in accordance with respect to the Design Quality principles as set out in SEPP 65. As noted in the introduction:

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SEPP Design Verification Statement
Statement of Design

- Good design is a creative process which, when applied to towns and cities, results in the development of great urban places: buildings, streets, squares and parks.
- Good design is inextricably linked to its site and locality, responding to the landscape, existing built form, culture and attitudes. It provides sustainable living environments, both in private and public areas.
- Good Design serves the public interest and includes appropriate innovation to respond to technical, social, aesthetic, economic and environmental challenges.
- The design quality principles do not generate design solutions, but provide a guide to achieving good design and the means of evaluating the merit of proposed solutions.



Yours Sincerely

Anthony Kelly

B.Arch RAIA

Principal Architect Reg 6999

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Proposed Development

The development is within the Umina Beach locality.

The proposed development was previously submitted for Development application approval to Central Coast Council for a mixed used outcome, consisting of three ground floor commercial suites, basement parking and 14 residential units.

The amended development responds to the need for housing of the community, appropriate commercial facilities providing future employment opportunities, as well as consideration to adjoining lots.

The following principles have guided the design:

- Architectural Environment The proposed building use clean lines and façades which include glazing, recesses, and architectural curved features to avoid a flat building mass. Substantial landscaping surrounds the development, providing improved visual aspect. Communal areas include improvement safety and security for residents.
- Scale and Context The proposed development will form a consistent and expected outcome, forming a desired architectural example of a medium density residential building within a CBD context.

Design Quality Principles

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Design Quality Principle 1: Context

Objectives

“Good design responds and contributes to its context. Context is the key natural and natural built features of an area, their relationship and the character they create when combined. It also includes social, economic, health and environmental conditions.”

Proposed Development

The proposed development occupies a site fronting Alfred Street and West Street with dual street front access, zoned B2 – local centre. It is within Central Coast council, Umina CBD area. The proposal responds to the existing urban built form to the west along West Street and the future development in the immediate vicinity.

Along West Street is a mixture of low to medium rise commercial and residential development. Alfred Street transitions from low density residential to CBD centre. Progression of the density of developments is evident along West street, with both 279 West Street and 379 West Street exhibiting high quality materiality over three to four storeys.

The changing development density will enable and encourage investment in Umina CBD with future commercial and residential developments.

Compliance

Yes

Design Quality Principle 2: Built Form and Scale

Objectives

“Good Design achieves a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings.”

Good Design also achieves an appropriate built form for the site and the building in terms of building alignments, proportions, building type, articulation and the manipulation of building elements. Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook.

Proposed Development

A variety of articulation in both form and scale have been used in response to the changing different context of the area across the sites:

- Steps in the façade and varied materials
- Articulated roof elements
- Screening and to create visual interest

Compliance

Yes

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Design Quality Principle 3: Density

Objectives

“Good design achieves a high level of amenity for residents and each apartment, resulting in a density appropriate to the site and its context.

Appropriate densities are consistent with the area’s existing or projected population. Appropriate densities can be sustained by existing or proposed infrastructure, public transport, access to jobs, community facilities and the environment.”

Proposed Development

The proposed development's proximity to the CBD, public transport, medical facilities, entertainment and employment makes it a strategic site for densification, providing housing within a high amenity area.

Parts of the site bordering West Street are ear-marked for high-density development, with more generous FSR and height allowances, and the design responds accordingly.

All apartments experience a high level of amenity with generous internal and external spaces. Additional bike storage at the ground floor of the development offers ride-to-work lifestyle. The proposed development provides density to activate and encourage the development of a vibrant, culturally diverse, multi-use precinct. The amenity offered is in keeping with the overall strategic direction of the Umina Beach CBD precinct, contributing toward ensuring its future as a active CBD.

Compliance

Yes

Design Quality Principle 4: Sustainability

Objectives

“Good design combines positive environmental, social and economic outcomes. Good Sustainable design includes use of natural cross ventilation and sunlight for the amenity and liveability of residents and passive thermal design for ventilation, heating and cooling reducing reliance on technology and operation costs. Other elements include recycling and reuse of materials, and deep soil zones for groundwater recharge and vegetation.”

Proposed Development

Density and Location:

- The proposed development is strategically located to enable more people to live within a high-amenity area, in close proximity to the CBD and public transport, helping reducing reliance on private transport

Apartment Design:

- the apartments utilise passive design strategies wherever possible to reduce the reliance on artificial means of controlling thermal comfort – e.g., consideration given to the orientation and operation of glazed facades to maximise natural daylight, solar heating, and cross ventilation.

Compliance

Yes

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- 71% of the apartments receive 3 hours of solar access, reducing reliance on artificial lighting
- 78% of the apartments allow cross ventilation, and have multiple aspects ensuring that energy is not expended on lighting and ventilation.

Outdoor Spaces:

- The proposed development includes a large amount of landscaping, both surrounding the buildings and on top of structures to minimise hard surfaces and stormwater run off
- The proposal encourages communal interaction through a series of private and public communal spaces

Street Frontage:

- passive surveillance of the street from the residential towers as well as the associated increase in foot traffic in the area will contribute to a safe neighbourhood

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Design Quality Principle 5: Landscape

Objectives

“Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in attractive developments with good amenity. A positive image and contextual fit of well designed developments is achieved by contributing to the landscape character of the streetscape and neighbourhood.

Good Landscape design enhances the development’s environmental performance by retaining positive natural features which contribute to the local context, co-ordinating water and soil management, solar access, micro-climate, tree canopy, habitat values, and preserving green networks. Good landscape design optimises usability, privacy and opportunities for social interaction, provides for practical establishment and long term management.”

Proposed Development

- Unimpeded soil areas have been provided wherever possible, to allow for planting of large trees
- Landscape is provided to the street frontages to enhance public domain with both hard and soft landscaping. This provides a visual buffer between the various public and private uses and entry points.
- The extensive provision of soft landscaping to roof areas effectively minimizes stormwater runoff, with excess stormwater being captured and reused.

Compliance

Yes

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Design Quality Principle 6: Amenity

Objectives

“Good design positively influences internal and external amenity for residents and neighbours. Achieving good amenity contributes to positive living environments and resident well being.

Good amenity combines appropriate room dimensions and shapes, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas, and ease of access for all age groups and degrees of mobility..”

Proposed Development

- The proposal achieves a high degree of amenity, utilizing available natural light and maximizing cross-ventilation.
- The apartments have been designed in accordance with SEPP 65 principles, and provide a high level of amenity
- Deep balconies act as outdoor rooms that provide shading in summer to the interior whilst still being able to occupy the edge of the building
- All apartments exceed the minimum sizes recommended by the ADG
- Appropriate storage space is provided
- The development contributes to the general public amenity at the ground floor level through activation of frontages via commercial, lobby spaces and access.
- High quality pedestrian link through the site connecting dual frontages
- In addition, a common open space has been provided for residents' use that accommodate a range of activities

Compliance

Yes

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Design Quality Principle 7: Safety

Objectives

“Good design optimises safety and security, within the development and the public domain. It provides for quality public and private spaces that are clearly defined and fit for intended purpose. Opportunities to maximise passive surveillance of public and communal areas promote safety. A positive relationship between public and private spaces is achieved through clearly defines secure access points and well lit and visible areas that are easily maintained and appropriate to the location and purpose”

Proposed Development

- A positive relationship between public and private spaces is achieved through well lit and visible areas that are easily maintained with abundant passive surveillance.
- Car park layouts are designed to minimize opportunities for alcoves. Columns or walls do not obstruct sight lines, car parking is open. Security access in the form of swipe cards and remote controllers will be provided.
- Passive surveillance of the surrounding streets and common open spaces is provided by the upper storeys, and ground-floor apartments
- Access to the residential levels of the development is restricted to residents and their visitors via secure lobby areas

Compliance

Yes

Design Quality Principle 8: Housing Diversity and Social Interaction

Objectives

“Good Design achieves a mix of apartment sizes, providing housing choice for different demographics, living needs and household budgets. Well designed apartment developments respond to social context by providing housing facilities to suit the existing and future social mix. Good design involves practical and flexible features, including different types of communal spaces for a broad range of people, providing opportunities for social interaction amongst residents.

Proposed Development

The location of the development at Umina CBD will attract a varied demographic.
The apartment achieves a good level of diversity:

- 1-bed units: 2
- 2-bed units: 4
- 3-bed units: 8

15% (2) units meet the AS4299 adaptable Housing guidelines, and a further 5% (1) meet the SEPP 65 livable requirements ensuring flexibility of apartment design to meet the occupants needs over time.
Communal open spaces are provided for resident use.

Compliance

Yes

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Design Quality Principle 9: Aesthetics

Objectives

“Good Design achieves a built form that has good proportions and a balanced composition of elements, reflecting the internal layout and structure. Good Design uses a variety of materials colours and textures. The visual appearance of well designed apartment development responds to the existing or future local context, particularly desirable elements and repetitions of the streetscape.

Proposed Development

The proposal aims to positively contribute to the desired future character of the Umina Beach CBD area, the proposed materials respond to and encourage the future streetscape as a coastal landscape and contribute to the emerging character of the area.

Exposed concrete slab edges interlocks with the vertical elements, tying the facades together. Use of soft coastal sandstone colours, off white vertical cladding and stone elements is reminiscent of the coastal seaside character of the prevailing area. Robust materials that are long lasting with low maintenance also ensure longevity.

The proposed development is also sensitive to its current context of lower-scale residences and businesses, and has clearly defined elements at a relatable scale, and generous landscaping to soften the visual impact of the development.

Compliance

Yes

ADG Response Table

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1.0 OBJECTIVES

OBJECTIVE	SUMMARY	ACTIONS	COMPLIANCE
Part 1			
Identifying the context	Apartment Types	Tower apartment is proposed	Yes
2C – Building Height	14.5 m	4 Storeys	No – variation is sought
2D (FSR)	1.8	1.66	Yes
Part 2D			
2E Depth	12 – 18 metres from glass to glass recommended by ADG	16.2m	Yes
SITING			
3A-1	Site Analysis illustrates that design decisions have been based upon the opportunities and constraints of the site.	<p>The development is within the Umina CBD area, and responds to the specific development opportunities and constraints of the site, being extremely well located to public transport, services and amenity.</p> <p>The massing of the proposal responds to both the precinct wide CBD master plan and ambitions for the inner urban context</p>	Yes
3B-1	Building types and layouts respond to the streetscape and site while optimising solar access within the development	Articulated as related to the street elements and neighbouring buildings. Distinct breaks allow for optimized solar access	Yes

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3B-2	Overshadowing of neighbouring properties is minimised during mid winter	Heights generally comply with the LEP and DCP permissible outcomes. The building is generally set away from neighbouring properties. The orientation ensures minimal overshadowing to adjacent development sites.	Yes									
3C-1	Transition between private and public domain is achieved without compromising	Access to the site through lobby areas and limited-access driveway	Yes									
3C-2	Amenity of the public domain is retained and enhanced	The proposed building provides passive surveillance to the street, as well as providing uses at ground floor.	Yes									
3D-1	An adequate area of communal open space is provided to enhance residential	Ample landscaped communal open space is provided. Each apartment has its own private open space, all apartments have access to communal spaces.	Yes									
3D-2	Communal open space is designed to allow for a range of activities, respond to	Communal outdoor spaces include seating, turfed spaces and landscaping, to accommodate a range of activities	Yes									
3D-3	Communal open space is designed to maximise safety	Communal open space is fenced and landscaped to restrict unauthorised access; Neighbouring buildings provide passive surveillance	Yes									
3D-4	Public open space, where provided, is responsive to the existing pattern and	Existing public open space arrangement maintained	Yes									
3E-1	Deep soil zones allow for and support healthy plant growth. Min. deep soil zones <table><tr><td><650sqm area</td><td>No min. dimensions</td><td>7% site area</td></tr><tr><td>650 – 1500 area</td><td>3m min dimension</td><td>7% site area</td></tr><tr><td>≥ 1500 area</td><td>6m min dimension</td><td>7% site area</td></tr></table>	<650sqm area	No min. dimensions	7% site area	650 – 1500 area	3m min dimension	7% site area	≥ 1500 area	6m min dimension	7% site area	The proposed development is extensively landscaped, including: - planters along street frontages with min. 0.6-1m depth to allow for substantial plantings and upper storeys - soil area with no structures below = 7.5% site area (107SQM)	Yes
<650sqm area	No min. dimensions	7% site area										
650 – 1500 area	3m min dimension	7% site area										
≥ 1500 area	6m min dimension	7% site area										

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3F-1	<p>Adequate building separation distances are shared equitably between neighbouring sites to achieve reasonable levels of external and internal visual privacy</p> <p>Height Habitable rooms/balconies Non habitable rooms</p> <p>Up to 12m 6m 3m</p> <p>Up to 25m 9m 4.5m</p> <p>>25m 12m 6m</p>	<p>Buildings are suitably separated from neighbouring sites. Further separation of habitable rooms are protected by louvres, external blades and blank walls.</p> <p>The non compliant setbacks have been discussed at length, are generally seen as acceptable by central coast council during meetings.</p>	Yes
3F-2	Site and building design elements increase privacy without compromising access to light and air and balance outlook and views between habitable rooms and private open space.	Privacy considered without compromising each primary balcony without overlooking of neighbouring habitable rooms. Use of louvres and blade walls on balconies further assist this.	Yes
3G-1	Building entries and pedestrian access connects to and addresses the public domain	Lobbies address street; with generous awning.	Yes
3G-2	Access, entries and pathways are accessible and easy to identify	Access paths are accessible and easily identified from the street	Yes
3G-3	Large sites provide pedestrian links for access to streets and connection to destinations	NA	Yes

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3H-1	Vehicle access points are designed to achieve safety, minimise conflicts between pedestrians and vehicles and create high	Conforms; to AS2890	Yes
3J-1	Car parking is provided based on proximity to public transport in	Adequate car parking provided to service both residential and commercial needs	Yes
3J-2	Parking and facilities are provided for other modes of transport	Motorcycle parking has been provided on site, dedicated bicycle parking located on the ground floor	Yes
3J-3	Car park design and access is safe and secure		Yes
3J-4	Visual and environmental impacts of underground car parking are minimised	Buffer landscaping to be provided as much as possible to above- ground sections of parking areas	Yes
3J-5	Visual and environmental impacts of on-grade car parking are minimised		N/A
3J-6	Visual and environmental impacts of above ground enclosed car parking are minimised		N/A

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	DESIGNING THE BUILDING		
4A-1	Optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space All other areas – a min. of 3 hours A max. of 15% receive no sun in mid winter	71% of apartments receive 3+ hrs direct sunlight in mid winter 0% receive less than 3hrs direct sunlight in mid winter 0% are south-facing and receive no direct sunlight in mid winter	Yes
	2 hours min sunlight midwinter in	See above	Yes
	All other areas a min. of 3 hours	See above	Yes
4A-2	Daylight access is maximised where sunlight is	See above	Yes
4A-3	Design incorporates shading and glare control, particularly for warmer months	All north facing windows from living areas are provided deep balconies for shading, with eastern and western units screened or with balconies to alleviate solar glare.	Yes
4B-1	All habitable rooms are naturally ventilated	all habitable rooms have operable glazing, allowing for natural ventilation	Yes
4B-2	The layout and design of single aspect apartments maximises natural ventilation	The scheme contains 3 single aspect apartments, which are 1 bedroom apartments that have ideal north facing aspect.	Yes
4B-3	The number of apartments with cross ventilation is maximised At least 60% of apartments are naturally cross ventilated	78% of apartments are cross ventilated as per ADG guidelines There are no cross-over apartments	Yes
4C-1	Ceiling height achieves sufficient natural ventilation and daylight access. Min height of – Habitable rooms 2.7m Non habitable rooms 2.4m Two storey apartments 2.7m main living floor 2.4m for second floor (max. 50% area) Attic spaces 1.8m at edge of room 30° ceiling slope	All habitable rooms have at least 2.7m floor to ceiling clearance	Yes

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4C-2	Ceiling height increases the sense of space in apartments and provides for	See above	Yes
4C-3	Ceiling height contributed to flexibility of building use over the life of the building	See above	Yes
4D-1	Layout of rooms within an apartment is functional, well organised and provides a high standard of amenity	Apartment layouts designed to make the most of their location in each building, and to provide a high level of amenity	Yes
	Min. areas 1 bed 50sqm 2 bed 70sqm 3 bed 90sqm	Complies	Yes
	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	All habitable rooms have operable windows in excess of the 10% minimum requirement.	Yes
4D-2	Environmental performance of the apartment is	Complies	Yes
	Habitable room depths are limited to a maximum of 2.5 x the ceiling height	Complies	Yes
	In open plan layouts the maximum habitable room depth is 8m from a window	Complies	Yes
4D-3	Apartment layouts are designed to accommodate a variety of household	Complies	Yes
	Master bedrooms have a minimum area of 10sqm and other bedrooms	Complies	Yes
	Bedrooms have a minimum dimension of 3m (excluding robes)	Complies	Yes

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	Living rooms or open plan living have min width of 3.6m for studios/1beds	Complies	Yes
	Width of cross over apartments are at least 4m internally to avoid narrow layouts	Not applicable	NA
4E-1	Apartments provide appropriately sized private open space and balconies to enhance residential amenity	Primary balconies meet minimum requirements	Yes
	Primary balconies 1 bed 8sqm 2m min depth 2 bed 10sqm 2m min depth 3 bed 12sqm 2.4m min depth	See above	Yes
	Apartments at ground level or on podium have a private open space instead of a balcony. Minimum area is 15sqm and minimum depth is	Larger private open spaces have been provided for apartments on ground level	Yes
4E-3	Private open space and balcony design is integrated into and contributes to the overall	Balconies are integrated into the design, and used to create recesses in building facades, and provide visual relief	Yes
4E-4	Private open space and balcony design	Balcony railings to comply with BCA requirements	Yes
4F-1	Common circulation spaces achieve good amenity and properly service the number	Complies	Yes
	Maximum number of apartments off a circulation core on a single level is 8	Complies	No
	For buildings 10 + storeys, maximum number of apartments sharing a single lift is 40	See above	Yes
4F-2	Common circulation spaces promote safety and provide for social interaction between	Complies	Yes
4G-1	Adequate, well designed storage is provided in	Adequate storage is provided within each apartment	Yes

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	Studio 4m3 1 bed 6m3 2 bed 8m3 3 + 10m3		
4G-2	Additional storage is conveniently located, accessible and nominated for individual	Additional storage is located within the basement parking level, and is accessible via the lift cores	Yes
4H-1	Noise transfer is minimised through the siting of buildings and building layout	Complies	Yes
4H-2	Noise impacts are mitigated within apartments through layout and acoustic	All separating construction to be in accordance with the BCA	Yes
4J-1	In noisy or hostile environments the impacts of external noise and pollution are minimised	Complies	Yes
4J-2	Appropriate noise shielding or attenuation techniques for the building design, construction and choice of materials are used to mitigate noise transmission.	The majority of units are orientated away from traffic noise. Apartments facing Alfred Street mitigate street noise through landscaping, setbacks and screening	Yes
4K-1	A range of apartment types and sizes is provided to cater for different household types now and into the future.	The proposal contains a mix of one, and three bedroom units of varying configurations and character, Meeting SDA compliance requirements for fully accessible and high physical support needs	Yes
4K-2	The apartment mix is distributed to suitable locations within the building.	The proposal contains a mix of one, two and three bedroom units of varying configurations and character.	Yes
4L-1	Street frontage activity is maximised where ground floor apartments are located.		N/A
4L-2	Design of ground floor apartments delivers amenity and safety for residents		N/A
4M-1	Building facades provide visual interest along the street while respecting the character of the local area.	The street façade is carefully considered with the use of soft sandy tones shown through the materiality defining the use of the building. Concrete and painted elements provide harmony between the different aspects of the façade, providing the character.	Yes

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4M-2	Building functions are expressed by the façade	Positioning of balconies and screened elements gives emphasis to corners of the building. Apartment layouts are visible in façade through window positioning.	Yes
4N-1	Roof treatments are integrated into the building design and respond positively to the street.	Roofs are to be slim, floating elements with recessed elements, reducing the visual scale of the upper floor	Yes
4N-2	Opportunities to use roof space for residential accommodation and open space are maximised.	See above	Yes
4N-3	Roof design incorporates sustainability features	Roofs with northern exposure have the potential to shade units and capture rainwater	yes
4O-1	Landscape design is viable and sustainable	Plants have been selected by the landscape architect to suit site conditions and council guidelines	Yes
4O-2	Landscape design contributes to the streetscape and amenity	See landscape architects plan	Yes
4P-1	Appropriate soil profiles are provided	To be considered in more detail at later design stage	
4P-2	Plant growth is optimised with appropriate selection and	Plants have been selected by the landscape architect to suit site conditions and council guidelines	Yes
4P-3	Planting on structures contributes to the quality and amenity of communal and public open spaces	Significant planting provided above the basement carpark, and around the podium perimeter	Yes

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4Q-1	Universal design features are included in apartment design to promote flexible housing for all community members	At least 20% silver level liveable housing units provided (15% AS4299, 5% liveable)	Yes
4Q-2	A variety of apartments with adaptable	See above	Yes
4Q-3	Apartment layouts are flexible and accommodate a range of lifestyle needs	A wide variety of unit types are provided, catering to a range of different lifestyles	Yes
4R-1	New additions to existing buildings are contemporary and complementary and enhance an areas identity and sense of place		N/A
4R-2	Adapted buildings provide residential amenity while not precluding future adaptive reuse		N/A
4S-1	Mixed use developments are provided in appropriate locations and provide active street frontages that encourage pedestrian movement.	This is a mixed use development ideally located in the Umina Beach CBD precinct, with close proximity to transport. New neighbouring developments will further assist in increasing pedestrian movements	Yes
4S-2	Residential levels of the building are integrated within the development, and safety and amenity is maximised for	Access to the residential units is restricted to residents and their visitors via limited-access lobbies; direct access to ground floor from the street is limited by private locked gates	Yes
4T-1	Awnings are well located and complement and integrate with building design	An awning entrance is provided over the building entry, integrated into the design.	Yes
4T-2	Signage responds to the context and desired	To be considered in more detail at later design stage	N/A
4U-1	Development incorporates passive environmental design	Sunlight and ventilation are provided through passive means to the majority of apartments	Yes
4U-2	Development incorporates passive solar design to optimise heat storage in winter	See above	Yes

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4U-3	Adequate natural ventilation minimises the need for mechanical ventilation	Most apartments have two-aspects, or are designed to facilitate cross ventilation	Yes
4V-1	Potable water use is minimised	In accordance with DCP	Yes
4V-2	Urban stormwater is treated on site before being discharged to receiving waters	In accordance with DCP	Yes
4V-3	Flood management systems are integrated into site design	In accordance with DCP	Yes
4W-1	Waste storage facilities are designed to minimise impacts on the streetscape,	Waste storage areas in basement levels, away from streetscape and building entries and resident amenities	Yes
4W-2	Domestic waste is minimised by providing safe and convenient source	Complies	Yes
4X-1	Building design detail provides protection from weathering	In accordance with BCA	Yes
4X-2	Systems and access enable ease of	Complies	Yes
4X-3	Material selection reduces ongoing	Durable materials have been nominated	Yes

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