

Wednesday, 1 August 2012

The Director General
Department of Planning & Infrastructure
23-33 Bridge Street
Sydney NSW 2000

Architecture
Urban Design
Planning
Interior Architecture

Attention: Cameron Sargent
Team Leader, Metropolitan and Regional Projects North

**RE: Major Project MP 08_0116 - Potts Hill Residential Estate – Civil Works Stage 2
Section 75W Modification No. 2**

Dear Cameron,

We write on behalf of Landcom.

This letter and attachments form an Environmental Assessment to support a Section 75W Modification to the abovementioned Major Project Approval. Under Section 75W of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, we seek approval to modify Condition A2 of the Project Application Consent MP08_0116 (as modified) to amend the number and type of lots, consolidate a number of lots to accommodate moderate income housing, amend the boundaries between Stages 1, 2 and 3, amend the size of a number of lots and amend the Conditions of Approval to reflect these changes.

The modification will result in an increase from 217 low density residential lots to 227 low density residential lots. No change is proposed to the number of approved medium density residential lots.

The report should be read in conjunction with the attached documentation including:

- **Attachment A:** Project Approval MP 08_0116 and MP 08_0116 MOD 1;
- **Attachment B:** Modified Draft Plans of Subdivision and schedule of lots prepared by Cardno;
- **Attachment C:** Indicative architectural drawings of terrace houses for proposed 5.1m wide lots;
- **Attachment D:** Approved Plans of Subdivision (MP 08_0116); and
- **Attachment E:** Approved Civil Engineering Drawings (MP 08_0116).

1. Site and locality

The subject site is situated at Potts Hill, within the City of Bankstown LGA. The site is generally bounded by Rookwood Road and Graf Avenue (east), a water supply pipeline (north), Cooper Road (west) and Brunner Road (south).

The approved project application as modified relates to surplus lands, divided into two precincts, being the Eastern Business Park Precinct (the 'Eastern Precinct') and the Western Residential Lands Precinct (the 'Western Precinct').

The land to which this modification relates is legally described as Part Lot 1 in DP 610303, Lot 2 in DP 456502 and Lot 2 in DP 225818.

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The Western precinct comprises 19.8 hectares of residential zoned land as well as 4.9 hectares zoned for open space. Entrances to this precinct will be located off Brunker Road (south) and Cooper Road (west). The eastern Precinct is zoned for Business Park uses and has an area of approximately 15.3 hectares.

Demolition and site remediation works have been completed and civic works have commenced on the Stage 1 development area (southern portion of the site).

2. Development consent history

On 13 June 2007, a State Significance Site Study was lodged by Landcom and Sydney Water Corporation requesting that the Potts Hill site be listed as a State Significant Site under State Environmental Planning Policy (Major Development) 2005. On 14 July 2007, the Minister for Planning declared that the site could be considered a State Significant Site.

A Concept Plan application for development of the Western Precinct (MP 07_0099) was approved by the Minister for Planning on 27 April 2009.

A Preliminary Environmental Assessment and request for Director-General's Requirements (DGRs) was lodged by Landcom in March 2009 for Major Project MP 08_0116 for Stage 2 civil and infrastructure works at Potts Hill Reservoir site (proposed residential precinct), to include subdivision, bulk earthworks (including excavation and compaction), vegetation removal, site infrastructure (including roads, drainage works and utilities) and the dedication of public roads and open spaces. DGRs were issued on 4 July 2009. Major Project Approval was granted by Richard Pearson, Deputy Director General of the Department of Planning the subdivision of the Western Precinct on 4 September 2010. It is this consent, which is sought to be modified.

A Section 75W Modification of MP 08_0116 was submitted to the Minister for Planning on 10 March 2011. The modification application sought consent to amend an approved civil drawing and to amend the location of the 132 KV electricity main. The modification application was approved on 29 August 2011.

3. The proposed modifications

It is proposed to amend the approved subdivision plans in order to:

- Amend the number of lots by introducing a 5.1 metre wide lot to accommodate three (3) bedroom terrace house development;
- Consolidate a number of lots to create opportunity for a community housing provider to provide 32 dwellings across the development;
- Amend the boundaries between Stages 1 and 2 and Stages 2 and 3; and
- Amend lot sizes on the subdivision plan to reflect the approved Civil Engineering Plans.

Consequently, it is proposed that Conditions A1 and A2 of the Conditions of Approval be amended to reflect the above proposed modifications.

A copy of the approved subdivision plans is provided at **Attachment D**.

3.1 Modification to Condition A1: Development Description

The proposed modifications to Condition A1 are outlined below with modifications in red text:

'A1. Development Description

"Project Approval is granted for the following:

- *Three stage subdivision of the subject site into ~~226~~ 236 lots:*
 - ~~217~~ 227 low density;

- Two (2) medium density residential lots;
- Seven (7) lots for open space.
- Dedication of roads, stormwater and public domain areas to Bankstown City Council at registration of the subdivision plans;
- Site embellishment works, vegetation removal, bulk earth works and stripping and stockpiling works;
- Construction of roads and associated infrastructure;
- Embellishment and construction of all public domain areas and structures;
- Establishment of all stormwater quality management and on-site detention facilities, to be dedicated to Bankstown City Council, including the provision of servicing infrastructure to residential lots;
- Landscaping and bush regeneration works;
- Security and residential fencing to the retained lands and surrounding residential properties; and
- Site disestablishment works, including removal of site offices, sheds, amenities, compounds and rehabilitation of those areas".

The proposed modifications to the low density residential lots resulting in an increase in lot numbers are due to the amalgamation and reconfiguration of approved lots, as detailed below:

Proposed Stage 1:

- Approved Lot 256 to 258 are to be consolidated into one new lot (proposed Lot 166); and
- Approved Lots 165 and 166 are to be consolidated into one new lot (proposed Lot 165);

Proposed Stage 2:

- Approved Lots 283 to 289 are to be subdivided into 12 x new lots (proposed Lots 262 to 268 and 281 to 285);
- Approved Lots 276 to 281 are to be subdivided into 8 x new lots (proposed Lots 313 to 320); and
- Approved Lots 290 to 306 are to be subdivided into 26 x new lots (proposed Lots 287 to 312).

Proposed Stage 3:

- Approved Lots 430 to 432 and 438 to be consolidated into one new lot (proposed Lot 425).

The proposal to modify the subdivision layout will result in an increase from 217 low density residential lots to 227 low density residential lots. No change is proposed to the number of approved medium density lots.

Rationale for proposed changes:

The primary rationale for the proposed changes is to accommodate community housing development and to provide more moderate income housing product within the Potts Hill Residential Precinct in order to achieve Landcom's sustainability target of 7.5% moderate income housing within new residential developments.

Landcom has partnered with a community housing provider, Link Housing, to accommodate 32 community homes within Potts Hill. The consolidation and reconfiguration of lots will assist in providing optimal duplex terrace lots for Link Housing to develop community housing. These homes are to be retained by Link Housing to be rented to key workers at below market rents.

Additional lots are proposed adjacent to the parklands at Stage 2. The proposed 5.1 metre lots will be capable of accommodating attached terrace house developments, close to open space and amenities, increasing housing choice within the locality. Landcom has developed a module for 5.1 metre wide terrace housing, which may provide up to 3 bedrooms and a single garage, at an affordable entry-level price point. Indicative terrace house designs are provided at **Attachment C**.

A revised schedule of lots including the area of each proposed lot is provided at **Attachment B**.

3.2 Condition A2: Development in Accordance with Plans and Documentation

The proposed modifications to Condition A2 are outlined below with modifications in red text:

'Condition A2 Development in Accordance with Plans and Documentation

The development shall generally be in accordance with the following plans, documentation and recommendations made therein:

A. Environmental Assessment Report for Western Residential Precinct Potts Hill, prepared by Architectus dated November 2009, including appendices and Preferred Project Report prepared by Architectus dated June 2010, including appendices			
B. Preliminary Construction Environmental Management Plan prepared by Cardno dated 11 May 2010			
C. Statement of Commitments prepared by Architectus contained in Schedule 3.			
D. Subdivision Plans prepared by Cardno and detailed as follows:			
Drawing No	Revision	Name of Plan	Date
600246 SA-101	B C	Plan of proposed Stage 1 Subdivision	24 November 2009 20 July 2012
600246 SA-102	B C	Plan of proposed Stage 1 Subdivision	24 November 2009 20 July 2012
600246 SA-201	B C	Plan of proposed Stage 2 Subdivision	24 November 2009 20 July 2012
600246 SA-202	B C	Plan of proposed Stage 2 Subdivision	24 November 2009 20 July 2012
600246 SA-203	B C	Plan of proposed Stage 2 Subdivision	24 November 2009 20 July 2012
600246 SA-301	B C	Plan of proposed Stage 3 Subdivision	24 November 2009 20 July 2012
600246 SA-302	B C	Plan of proposed Stage 3 Subdivision	24 November 2009 20 July 2012
600246-SA-303	B C	Plan of proposed Stage 3 Subdivision	24 November 2009 20 July 2012
D. Concept Civil Design plans prepared by Cardno and detailed as follows:			
600246-001	B	Cover Sheet and Drawing Schedule	2 December 2009
600246-002	A	General Notes	19 November 2009
600246-010	B	Site Plan	19 November 2009
600246-011	B	General Arrangement Plan 1 of 2	11 May 2010
600246-012	B	General Arrangement Plan 2 of 2	11 May 2010
600246-015	B	Typical Road Sections 1 of 3	11 May 2010

600246-016	B	Typical Road Sections 2 of 3	11 May 2010
600246-017	B	Typical Road Sections 3 of 3	11 May 2010
600246-020	B	Indicative Cut and Fill Plan and Existing Surface to Design Surface	11 May 2010
600246-024	A	Indicative Staging Plan	19 November 2009
600246-025	B	Indicative Lot Treatment Plan	11 May 2010
600246-026	B	Indicative Lot Treatment Details 1 of 3	11 May 2010
600246-027	B	Indicative Lot Treatment Details 2 of 3	11 May 2010
600246-028	B	Indicative Lot Treatment Details 2 of 3	11 May 2010
600246-030	B	Road Longitudinal Sections	11 May 2010
600246-031	B	Road Longitudinal Sections	11 May 2010
600246-032	B	Road Longitudinal Sections	11 May 2010
600246-033	B	Road Longitudinal Sections	11 May 2010
600246-034	B	Road Longitudinal Sections	11 May 2010
600246-035	B	Road Longitudinal Sections	11 May 2010
600246-036	B	Road Longitudinal Sections	11 May 2010
600246-037	A	Indicative Traffic Control Sections	19 November 2009
600246-040	B	Catchment Plan	11 May 2010
600246-041	A	Water Quality and Detention Basin No 1 Plan and Details	19 November 2009
600246-042	A	Water Quality and Detention Basin No 2 Arrangement Plan	19 November 2009
600246-043	A	Water Quality and Detention Basin No 2 Details	19 November 2009
600246-044	A	Water Quality and Detention Basin No 3 Plan	19 November 2009
600246-045	A	Water Quality and Detention Basin No 3 Details	19 November 2009
600246-050	A	Concept Sewer Layout Sheet 1 of 2	19 November 2009
600246-051	A	Concept Sewer Layout Sheet 2 of 2	19 November 2009
600246-052	A	Concept Potable and Recycled Water Layout	19 November 2009
600246-053	A	Concept Stormwater Layout Sheet 1 of 2	19 November 2009
600246-054	B	Concept Stormwater Layout Sheet 2 of 2	19 November 2009
600246-055	B	Erosion and Sediment Control Plan	26 June 2010
600246-056	B	Erosion and Sediment Control Details	19 November 2009
221465	Draft C	132kV Feeder 240 Overhead Mains Relocation Route Plan and Construction Schedule	11 February 2011

The amended Draft Plans of Subdivision (refer to **Attachment B**) reflect the modifications to the boundaries of Stages 1 and 2 and 2 and 3, and the modifications to the number and size of allotments. A summary of the proposed modifications to each Stage are detailed below:

Stage 1 Subdivision:

It is proposed that the boundaries between Stages 1 and 2 through the relocation of six (6) lots approved within Stage 2, to within Stage 1, as detailed at **Table 1**. These lots have been relocated as they adjoin a proposed road reservation with Stage 1, and therefore it is practical for these lots to be registered with the adjacent road lot within Stage 1.

Table 1 Stage 1 lot re-allocation

MP 08_0116 Approved Stage 2 Lot		MP 08_0116 MOD 2 Proposed Stage 1 Lot		Justification for relocation of lot and changes to lot configuration
Lot number	Lot area	Lot number	Lot area	
Lot 256	502.7m ²	Lot 166	1,429m ²	Relocation from Stage 2 to 1 to facilitate registration of this lot with the adjacent Stage 1 proposed road. The amalgamation of these lots into one super lot will facilitate the development of community housing.
Lot 257	420m ²			
Lot 258	507.7m ²			
Lot 217	502.6m ²	Lot 167	506.8m ²	Relocation from Stage 2 to 1 to facilitate registration of this lot with the adjacent Stage 1 proposed road.
Lot 216	420m ²	Lot 168	420m ²	Relocation from Stage 2 to 1 to facilitate registration of this lot with the adjacent Stage 1 proposed road.
Lot 215	502.7m ²	Lot 169	502.7m ²	Relocation from Stage 2 to 1 to facilitate registration of this lot with the adjacent Stage 1 proposed road.

It is also proposed that a number of lots be amended in size in order to accommodate the proposed community housing lots, boundary reconfigurations and as a result of the road width of Road 3 being made consistent with the approved Civil Engineering Plans (**Attachment E**).

The approved subdivision plan provides a road width of 17.4 metres, which is inconsistent with the approved Civil Engineering Plans, with an approved road width of 17 metres. The proposed lot size modifications are detailed at **Table 2**.

Table 2 Stage 1 lot amendments

Approved Lot Number (MP 08_0116)	Proposed Lot Number (Concept Plan MP 08_0116 MOD 2)	Approved Lot Area (Concept Plan MP 08_0116)	Proposed Lot Area (Concept Plan MP 08_0116 MOD 2)	Justification
Lot 153	Lot 153	475.5m ²	478.7m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 154	Lot 154	330m ²	332.2m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.

Approved Lot Number (MP 08_0116)	Proposed Lot Number (Concept Plan MP 08_0116 MOD 2)	Approved Lot Area (Concept Plan MP 08_0116)	Proposed Lot Area (Concept Plan MP 08_0116 MOD 2)	Justification
Lot 155	Lot 155	330m ²	332.2m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 156	Lot 156	450m ²	453m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 157	Lot 157	1,184m ²	1,185m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 158	Lot 158	764.5m ²	767.4m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 159	Lot 159	672.3m ²	675.2m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 160	Lot 160	448.6m ²	450.8m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 161	Lot 161	510.2m ²	513.1m ²	Readjustment of lot size as adjacent Road 3 width adjusted to match approved Civil Engineering Drawings.
Lot 165	Lot 165	370.5m ²	588.8m ² .	Amalgamation of these lots will allow for practical residential development on this land. The approved lot configuration is not considered to facilitate a practical development outcome, given the irregular shape of the allotment.
Lot 166		218.3m ²		

As a result of the above modifications within Stage 1, the area of Stage 1 will be increased from 9.343 hectares to 9.714 hectares.

Stage 2 Subdivision

It is proposed that the boundaries between Stages 2 and 3 through the relocation of nine (9) lots approved within Stage 3, to within Stage 2, as detailed at **Table 3**.

Table 3 Stage 2 lot re-allocation

MP 08_0116 Approved Stage 3 Lot		MP 08_0116 Mod 2 Proposed Stage 2 Lot		Justification for relocation of lot and changes to lot configuration
Lot number	Lot area	Lot number	Lot area	
Lot 401	571.5m	Lot 335	571.5m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 416	480m ²	Lot 334	480m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 417	540m ²	Lot 333	540m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 418	540m ²	Lot 332	540m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 419	480m ²	Lot 331	486m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 433	475.5m ²	Lot 330	481.5m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 434	330m ²	Lot 329	330m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 435	450m ²	Lot 328	450m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.
Lot 436	614m ²	Lot 327	614m ²	Relocation from Stage 3 to 2 to facilitate registration of this lot with the adjacent Stage 2 proposed road.

As noted earlier, it is also proposed that 32 new lots be created compared to the approved subdivision plan, resulting in an increase of 15 low density residential lots.

As a result of the above modifications, and the relocation of lots from Stage 2 to Stage 1, as described under 'Stage 1', the area of Stage 2 will increase from 9.526 hectares to 9.753 hectares.

Stage 3 Subdivision

The boundary between Stage 2 and 3 is modified as noted above, with nine lots approved within Stage 3, being transferred to Stage 2.

Also as noted earlier, it is proposed that approved Lots 430 to 432 and 438 be consolidated into one new lot (proposed Lot 425) to accommodate community housing development.

As a result of these modifications, the area of Stage 3 will be reduced from 4.214 hectares to 3.616 hectares.

4. Statutory considerations

4.1 Introduction

In accordance with Clause 3 of Schedule 6A of the EP&A Act, Section 75W of the Act as in force immediately before its repeal on 1 October 2011 as modified by Schedule 6A, continues to apply to transitional Part 3A projects.

This report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister (or his delegate) may approve or disapprove the modification of the project under Section 75W of the Act.

4.2 Environmental Assessment Requirements

Section 75W of the EP&A Act states the following:

'75W Modification of Minister's approval

(1) *In this section:*

"Minister's approval" means an approval to carry out a project under this Part, and includes an approval of a concept plan.

"Modification of approval" means changing the terms of a Minister's approval including:

- (a) revoking or varying a condition of the approval or imposing an additional condition of the approval, and*
- (b) changing the terms of any determination made by the Minister under Division 3 in connection with the approval*

(2) *The proponent may request the Minister to modify the Minister's approval for a project. The Minister's approval for a modification is not required if the project as modified will be consistent with the existing approval under this Part.*

(3) *The request for the Minister's approval is to be lodged with the Director-General. The Director-General may notify the proponent of environmental assessment requirements with respect to the proposed modifications that the proponent must comply with before the matter will be considered by the Minister.*

(4) *The Minister may modify the approval (with or without conditions) or disapprove of the modification.*

(5) *The proponent of a project to which Section 75K applies who is dissatisfied with the determination of a request under this section with respect to the project (or with the failure of the Minister to determine the request within 40 days after it is made) may, within the time prescribed by the regulations, appeal to the Court. The Court may determine any such appeal.*

(6) *Subsection (5) does not apply to a request to modify:*

- (a) An approval granted by or as directed by the Court on appeal, or*
- (b) A determination made by the Minister under Division 3 in connection with the approval or a concept plan.*

The Proponent requests that the Minister for Planning, as the consent authority, approve the proposed modifications to the Project Application MP 08_0116 (as modified).

No provisions of Section 75W impose any prohibition or limitations on the proposed modifications. The Proponent has not been notified of any environmental assessment requirements at the time of preparing this report. Should the Director-General consider additional environmental assessment requirements are necessary to be addressed by the Proponent, the proposal will provide an additional response to that request. Therefore it is considered that the proposed modifications satisfy the provisions of this Section.

5. Relevant planning instruments

The following planning instruments and controls may be applicable to the proposal to modify the subdivision layout. Section 75W of the EP&A Act does not require the consideration of relevant planning instruments, however these have been considered for consistency with local planning objectives.

The following EPIs and policies are of relevance to the proposed modification application:

- Bankstown Local Environmental Plan 2001 (BLEP 2001).

The relevant provisions of the BLEP 2001 are addressed below:

5.1 Bankstown Local Environmental Plan 2001 (BLEP 2001)

The relevant objectives of this plan are:

(a) *To regulate development in accordance with the following principles:*

(i) *new buildings shall be designed to achieve:*

- (A) *Good urban design, and*
- (B) *Public and private safety, and*
- (C) *Energy and resource efficiency, and*

...

(iv) *new development should not diminish the role of the Bankstown central business district (CBD) as a sub-regional centre, and*

(v) *new development in or affecting residential areas should be compatible with the prevailing suburban character and amenity of the locality of the development site.*

The proposed development is consistent with the relevant objectives of the BLEP 2011, in that the introduction of smaller lots will provide a more affordable dwelling type to the local area. The location of the proposed smaller lots is in the location where similar terrace type dwellings were approved in the previous Major Project Application.

Objective (i) comment:

The illustrative floor plans provided at **Attachment C** demonstrate that good degree of amenity can be achieved with generous living spaces in a more compact and affordable size lot. The modifications to the terrace house lots are a good urban design outcome. The terrace houses surround public open space, which will assist to define the street edge and enable more people to live opposite and adjacent the large park to benefit from this amenity. More dwellings fronting onto the park will enhance passive surveillance of the space that will enhance the safe use of the space for the public. Increasing the dwelling density close to the park will allow more residents within walking distance of open space, minimising dependence on the automobiles to drive to open space.

Changes proposed to the duplex lots are also consistent with BLEP 2011 objectives, providing the opportunity for community housing providers to accommodate some moderate income housing on the site, supporting household diversity.

Objective (iv) comment:

The proposed development will not diminish the role of the Bankstown CBD as a sub-regional centre. The CBD is appropriate for higher density forms of residential dwellings than at Potts Hill, and therefore the proposal will not impact the demand for residential housing in the CBD.

Objective (v) comment:

The proposed changes to attached dwelling types are entirely consistent with the original Concept Plan in terms of encouraging a variety of dwelling types and will not have an adverse impact on the suburban character and amenity of the local area.

Those areas subject to modifications to the lots are zoned R2 Low Density Residential under the BLEP 2001. The objectives of Zone R2 Low Density Residential are as follows:

- (a) *to provide for the housing needs of the community within a low density residential environment, and*
- (b) *to enable other land uses that provide facilities or services to meet the day to day needs of residents.*

No changes are proposed to the approved low density residential use of the land where attached dwellings and dwelling houses are permissible with consent. The proposed modifications are consistent with the objectives of the R2 Zone.

6. Conclusion

The proposed modifications under Section 75W of the EP&A Act 1979 will allow for additional moderate income housing to be provided for in the Potts Hill Residential Estate, with the introduction of smaller lots.

Accordingly, it is recommended that this Section 75W application be approved by the Minister for Planning and Infrastructure.

If you have any queries or would like to discuss this matter further, please do not hesitate to contact Camille Lattouf, Urban Planner on 8252 8400 or Nick Chandler, Senior Development Manager at Landcom on 9841 8600.

Yours sincerely,

John Riordan
Associate Director, Urban Design and Planning



Architectus Group Pty Ltd

cc. Nick Chandler, Senior Development Manager, Landcom - nchandler@landcom.nsw.gov.au

Attachment A

Project Approval MP 10_0816

Attachment B

Modified Draft Plans of Subdivision and schedule of lots

Prepared by Cardno

Attachment C

Indicative architectural drawings of terrace houses for proposed 5.1m wide lots.

Attachment D

Approved Plans of Subdivision (MP 08_0116)

Attachment E

Approved Civil Engineering Drawings (MP 08_0116)