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Mark Brown - RE: The Owners Strata Plan 74416 - Objections to the ProposedDevelopment at 89 George Street

From: Stuart Denney <Stuart.Denney@strataplus.com.au>
To: "mark.brown@planning.nsw.gov.au" <mark.brown@planning.nsw.gov.au>, "council@parracity.nsw.gov.au" <council@parracity.nsw.gov.au>
Date: 27/08/2010 14:37
Subject: RE: The Owners Strata Plan 74416 - Objections to the ProposedDevelopment at 89 George Street
Attachments: 270810 Letter re Development of 89 George Street.pdf; Department of Planning - Development of 89 George Street - Planning Directions.pdf; 89 George Street Development - Tanner Architects.pdf; 89 George Street Development -Impacts on Olive Tree at 85 George Street - Tree Wise Men.pdf

To the Department of Planning NSW and the CEO of Parramatta City Council,

Please find attached cover letter and supporting reports from the owners corporation for The Owners – Strata Plan 74416 at 85 George Street, Parramatta.

This letter and supporting documentation forms the basis for the owners corporations strong objections to the proposed development at 89 George Street.

Hard copies of the attached documents will follow shortly.
Regards
Stuart

Stuart Denney MISTM
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27 August 2010

Department of Planning
Sydney West Region
Level 3, 3 Marist Place,
Parramatta NSW 2150
Locked Bag 5020,
Parramatta NSW 2124
Via Email: mark.brown@planning.nsw.gov.au

Cc: CEO Parramatta City Council
Box 32, Parramatta, NSW 2124
Via Email: council@parracity.nsw.gov.au

Dear Sir/Madam,

RE: SP 74416 – 85 George Street, Parramatta – Proposed Development of 89 George Street, Parramatta.

We write as the strata managing agents for Strata Plan 74416 on behalf of the Owners Corporation.

The owners at Strata Plan 74416 (85 George Street) occupy the land immediately to the West of the proposed development at 89 George Street.

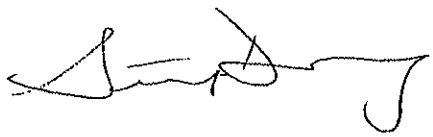
The Owners Corporation strongly object to the proposed development. The reasons for our objection are detailed in the following attached reports:

Town planning assessment-Planning Direction Pty Ltd
Heritage Impacts- Tanner architects
Tree impacts - Tree wise Men.

We seek a meeting with you and our consultants to discuss the development proposal and our objection prior to the matter being determined. Please contact me on 02 9319 1899 in this regard.

If you have any further questions or queries prior to this proposed meeting please do not hesitate to be in contact.

Yours Sincerely
Strata Plus Pty Ltd



Stuart Denney
Strata Manager – SP74416

Planning Direction Pty. Ltd.
Town Planning & Development Services

Department of Planning 27 August 2010

Sydney West Region
Level 3 , 3 Marist Place, Parramatta NSW 2150
Locked Bag 5020,
Parramatta NSW 2124

RE: Objection to Proposed development
N0 89 George Street Parramatta
Your Reference: MP 09_0128 - Commercial Retail Development

Dear Sir/Madam,

Planning Direction has been engaged by *Strata Plus Pty Ltd* (Managing Agents for the owners of property No 85 George Street Parramatta.) to review the above development application and to provide advice in respect of the town planning aspects of the proposed development.

Our firm was located in Parramatta for some 15 years before a recent relocation to Carlingford. I, (Danny Jones), have extensive experience in the application and interpretation of the Parramatta planning controls and in particular the controls relating to the Parramatta CBD.

As part of my assessment of the subject development application I have;

- Reviewed all of the documents available on the Planning NSW website, and
- Inspected the site and its context, and
- Considered the application pursuant to the provisions of xxx and xxx and the Environmental Planning and assessment Act, 1979.

This submission should be considered in conjunction with the Heritage Impact Report that has been prepared by *Tanner Architects*. In balanced consideration of all town planning matters, the proposed development is unacceptable and should be refused. This submission sets out the town planning reasons that substantiate refusal of the development application.

1.0 Characteristics of the Subject Site:

The subject site has a rectangular configuration with a very substantial depth relative to its limited width. In this respect the site has a frontage of only 18.5m to George Street and a depth of some 75-76m. The area of the site is a modest 1354sqm.

The site configuration and the narrow site width are significant constraints to design and development potential. The significant design limitations arising from the sites constrained area and configuration are acknowledged in the proponents expert reports,

"The elongated, narrow rectangular nature of the site dictates a slab block style building form in order to provide useable office floor plates and reasonable construction efficiency"

"Apart from a variation to the maximum FSR for sites of less than 2,500m2 and a more flexible application of side setback controls for the upper portion of the building, due to the narrow width of the site....."

2.0 Neighbouring Heritage Property- No 85 George Street

No 85 George Street adjoins the subject site immediately to the west and shares a common boundary that is some 75m in length with the proposed development site.

No 85 George Street is an item of heritage significance upon which are located Perth House, the former stable and their landscaped grounds.

Perth House is located towards the George Street site frontage and sits in a well landscaped setting with a very well defined curtilage.

The relatively low height of the existing building on No 89 George Street and the two storey height of the more recent development at No 83 George Street create a 'low scale' and 'open' setting for Perth House. Streetscape views in both directions along George street are of the heritage buildings and historic planting set against the backdrop of the open sky as influenced by CBD higher rise buildings that are well separated from Perth House (and as such do not visually overwhelm Perth House and its grounds)

The setting of Perth House and its grounds is essential to the significance and community enjoyment of the heritage item. From field inspection it is very evident that all other development in proximity of Perth House has been specifically designed to maintain a 'low building scale' and the 'open landscaped setting' of Perth House. In this respect the existing building to the east (No 89 George Street) has a low scale, more recent development to the west (No 83 George Street) is restricted to a two storey height, and the commercial building on No 85 George Street is well setback from Perth House.

The existing built form and development pattern in the visual catchment of Perth House does not dominate, over whelm or over power the heritage item.

3.0 Significant Non Compliance with FSR

The FSR controls under the City Centre LEP specifically acknowledge the development and design constraints associated with the development of small narrow sites, such as No 89 George Street. In this case the development of No 89 George Street is further influenced by the Perth House that warrants careful consideration of building height bulk and scale particularly towards the street frontage.

In recognition of the constraints of small narrow allotments the LEP contains development standards that restrict the development potential of smaller, poorly configured allotments. This sound planning approach has been recognised by the proponent's experts:

"The primary purpose for specifying reduced maximum FSR on sites of less than 2,500m2 is to encourage smaller sites to be amalgamated with adjoining land to provide sites of at least 2,500m2 capable of accommodating the height, bulk and scale of buildings preferred for the Parramatta CBD.

The above objective is soundly based and the principle of site amalgamation of smaller sites should be encouraged wherever possible."

The LEP applies a maximum FSR control (relative to a sites area) and a minimum site frontage control.

Pursuant to the LEP the maximum FSR that can be accommodated on the subject site is 6.9:1 and the minimum required site frontage is 20m.

The proposed development is significantly non compliant with both of these development standards having a FSR of 8.55:1 and a site frontage of only 18.5m.

It is generally acknowledged in the development industry that the MAXIMUM permitted development potential may not be able to be achieved on significantly constrained sites. In this case the development proposal endeavours to not only fully use the maximum permitted floor space benefiting the site but to significantly exceed that maximum potential.

The endeavour to over develop the site manifests in unacceptable town planning, heritage and urban design impacts and should not be supported. The proposed development is inconsistent with the planning principles and development standard objectives within the LEP.

The proponent is seeking approval to a development with a FSR of 8.55:1 being some 20 % greater than the maximum 6.9:1 permitted on the subject land.

The only potential to increase the FSR under the Parramatta City Centre LEP 2007 is pursuant to the provisions of clause 22. Clause 22 enables a maximum increase in FSR by a maximum of 10% and only then on the basis that the development of the site has been the subject of an architectural design competition and displays "design excellence".

Parramatta City Council has obtained legal advice that clause 24 of the PLEP 2007 (that deals with exceptions to development standards) cannot be used as a mechanism to vary floor space because of the provisions of clause 22. Council has confirmed that the only mechanism to vary the floor space ratio development standard is clause 22.

The proposed development is therefore prohibited by the LEP and there is no mechanism in the instrument that enables consent to be granted to this

application. The development of the land has not been the subject of an architectural design competition and that in any event the proposed development markedly exceeds the maximum 10% FSR variation that can be achieved under clause 22 of the LEP.

In reference to the site frontage control, the provisions of clause 22A of the LEP (that require a minimum street frontage of 20m for a development site) can only be varied if the consent authority receives and supports a written request to vary the development standard made pursuant to clause 24 of the LEP.

The variation to the FSR development standard in this instance results in a significant over development of the site and results in;

- a building form that poorly relates to the neighbouring heritage item and
- a building form that is inconsistent with the existing and likely future development pattern in the locality.

Further comment on the adverse impacts arising from the over development of the site are provided in subsequent sections of this report.

4.0 The proposed variation to the FSR is not well founded

The justification for the significant non compliance with the FSR is generally summarised in the following extract from the Statement of Environmental Effects.

"In the situation where it is not possible to achieve site amalgamation, it is considered that the floor space ratio controls applying to sites of less than 2,500m2 should be applied more flexibly. The focus should be on the appropriateness of built form outcome, rather than on numerical compliance with a development standard that is intended to apply to situations where site amalgamation is possible. Strict enforcement of the FSR standard would result in the loss of 3 levels of floor space, rendering the development unviable and creating a building of a height that would be incompatible with the 15 to 20 storey building height envisaged in the planning controls for the Commercial Core area of the CBD."

There is no apparent or substantiated reason as to why the site cannot be developed in a manner that complies with the LEP controls. The proponent has not provided any sound town planning justification for the significant non

compliance with the applicable FSR control. The only reasons for the non compliance are identified as:

- The inability to achieve site consolidation/amalgamation
- The variation is required for 'economically viable' redevelopment of the site.
- The proposal assists in achieving the objectives of the Metropolitan Strategy
- The proposal complies with the height control irrespective of the non compliance with the development standard.

For reasons detailed below the proponents justification for the significant non compliance with the maximum FSR control is not well founded.

It is important to note that the proponent does not suggest that the significant increase in the FSR enables *"a better design outcome"* or that the FSR non compliance *"better facilitates good design"* than a development designed to comply with the FSR development standard, as this clearly is not the case.

Site Consolidation

The LEP FSR controls have a specific town planning purpose- acknowledging that small narrow and deep development sites (such as the subject site) are not conducive to good/sensitive design because of their constrained area and configuration; generally design options are significantly enhanced as the allotment area increases. As such the LEP limits the development potential on small sites (area less than 2500sqm).

The applicant cannot achieve site amalgamation to increase the size of the development site. The applicant cannot therefore improve the sites area or configuration, the site is constrained. Pursuant to the LEP the site is simply not suited to increased intensity of development. The LEP is explicit in its intention that such constrained sites should be developed at a lower density for sound and accepted town planning reasons.

The fact that the applicant cannot achieve consolidation in itself provides no town planning justification to endorse such a significant non compliance with the development standard.

Economically viable development

The Statement of environmental effects states on a number of occasions that the increase in FSR is essential to the economic viability of the development. There is no detail however substantiating the claim.

The expert reports also advise that the LEP and DCP 2007 controls do facilitate economically viable development on the land:

"Following the September 2006 Meeting with Council's Design Panel, design work on the project at 89 George Street, Parramatta was put on hold pending release of the proposed new planning controls for the Parramatta City Centre. The new City centre Draft LEP and DCP were exhibited in January/February 2007 and proposed removal of building envelope controls and introduction of much higher floor space ratios for land in the commercial core of the City Centre. ***These new planning controls created an opportunity to development an office tower at 89 George Street that was feasible to build and provided floor plates of adequate size.***"

The subject land is currently under developed. The property contains a modest single storey concrete block building that is used for automotive purposes. The site is not highly capitalised. Income losses during construction would be minimal and demolition costs would be minimal.

There have been numerous other sites within the Parramatta CBD that have been economically redeveloped in a manner that complies with the FSR development standard. There are no particularly unique characteristics of the site that significantly increase the development costs.

Given the low level of capitalisation of the site, the generous FSR controls permitted by the LEP, and the comparable circumstances of other development sites in the Parramatta CBD that have been economically redeveloped, then it is respectfully suggested that the proponents claim that the 'increased FSR is essential to economically viable redevelopment of the subject site' is unsubstantiated and not well founded.

This consideration does not therefore justify the variation of the statutory FSR control.

Metropolitan Strategy

Development on the subject site and within the Parramatta CBD is governed by PLEP -City Centre 2007 and the supporting City Centre DCP 2007. These are very recent town planning instruments and the FSR controls therein were specifically adopted as they promoted State government policies including those within the Metropolitan Strategy.

The FSR controls that apply within the CBD are very well founded, the controls promote State government planning objectives and orderly and economic development within the city.

In direct response to the Metropolitan Strategy the current City Centre LEP significantly increased permissible FSR controls within the CBD in comparison to the previous planning regimes (SREP No 28 and PLEP 1987).

The ability for the Parramatta CBD to achieve the objectives of the Metropolitan Strategy and other State policies is not reliant on this development or any other single development within the city exceeding the LEP floor space ratio (density) controls. Future development within the CBD, as facilitated by compliance with the FSR controls in the City Centre LEP, will readily achieve such objectives.

This consideration does not therefore justify the substantial non compliance with the statutory FSR control.

Building height controls

The FSR is the primary planning control under the LEP and not the building height control.

The height control in unison with building setback controls establish a building envelope within which a building form, which complies with the FSR, must be contained.

It is common in planning instruments for the potential building envelope to be of a volume that very comfortably accommodates the permissible FSR. The purpose of this is to enable 'design flexibility' within the envelope so that the building can positively and sensitively respond to the characteristics of the site and its context.

The height/envelope controls should not be applied as meaning 'fill the envelope up' to determine the development density/FSR. It is not the purpose of the building envelope controls (including the building height control) to determine the density of development, as this is the specific purpose of the FSR control.

Under the City Centre LEP the maximum permitted variation to the FSR is 10%. This increase can only be achieved in specific circumstances and achieving the increase is subject to specific requirements (which are not satisfied by the proposed development).

The control of development density and the restrictions on FSR variations is a clear and deliberate planning decision that is based not only on urban design considerations but on sound strategic planning objectives for the overall management of growth and thus well being of the city. The Parramatta CBD has a finite 'environmental capacity' to accommodate development as determined by road and parking capacities, service availability, service provision and so on. The FSR controls have been formulated to equitably and appropriately distribute development potential and growth in a manner that is within the city's 'environmental capacity' and that that strengthens its form and structure.

Having regard to the above it cannot be reasonably argued that the significant variation to the FSR control is acceptable because of compliance with the height control. If this were to be the case then there would have been no FSR control inserted into the LEP as development potential would simply be determined by building envelope (height and setback) controls. The two controls clearly have their own functions to fulfil.

This consideration does not therefore justify the significant non compliance with the statutory FSR control.

5.0 Inappropriate Building Form

Any development on the subject site must respect the existing and likely future development pattern in the locality. The proposed development is inappropriate in consideration of both the existing and likely future character of the area.

The development pattern in this section of George Street has been influenced by Perth House that is of very significant heritage value and that is a very significant streetscape element.

The development pattern in proximity of Perth House is well established and is strongly characterised by lower scale buildings fronting George Street. The existing development pattern respects the setting of Perth House; in this regard higher rise buildings are well setback from Perth House so as to maintain its relatively open landscaped setting rather than 'towering over' and 'visually overwhelming' the heritage item. Existing higher rise buildings are well separated from the well defined curtilage of Perth House.

The height controls that apply to the subject site facilitate design options that distribute the floor space potential of the site (6.9:1) in a manner that sensitively relates to the established development pattern of the locality and the unique circumstances of Perth House.

Specifically, with a compliant development the permissible floor space could be primarily located in a higher tower element located towards the rear of the site with a significantly lower building element fronting George Street.

Rather than respond to the established development pattern, the design proposal presents a continuous high rise building wall immediately adjacent to Perth House rising in height to a thirteen storeys (or 55m) and with a wall length of some 75m. The constrained width of the site and non compliance with building setback and building separation controls reduce the opportunity for effective building articulation.

The development will not enhance and protect the existing landscaped setting and well established curtilage of Perth House, it will 'stand over' and 'overwhelm' Perth House and its grounds severely compromising its heritage significance and streetscape value.

This is a particularly unacceptable (and avoidable) consequence of the proponents' endeavours to over develop the site by significantly exceeding the maximum permissible floor space.

In this respect the proponents expert reports have advised that the proposed variation to the maximum FSR control manifests in an additional 3 storeys commenting "*Strict enforcement of the FSR standard would result in the loss of 3 levels of floor space*". The additional three floors significantly increase the building bulk and mass. The additional floor space is squeezed into a very constrained development site and this manifests in unacceptable adverse impacts.

The bulk mass and form of the proposed development is very unlike anything that exists within the visual catchment of Perth House, the design is insensitive to the established pattern of development and as such the proposed development is unacceptable having regard to the existing context of the site.

The proponent's expert reports acknowledge that the proposed development has been designed with primary consideration being given to the scale of development permitted by the new LEP controls ('future potential character') than the 'existing character' of the locality commenting;

"The proposed FSR of 8.543:1, whilst somewhat higher than the maximum FSR of 6.944:1 for sites of 1,354m2, is some 15% less than the 10:1 maximum allowable in the commercial core and allows viable development of the site, with a building form and height more compatible with that envisaged under the new planning controls introduced under LEP 2007"

The design does not provide "a *building form and height more compatible with that envisaged under the new planning controls introduced under LEP 2007"* but rather the design provides for a building that well exceeds and the new controls resulting in unacceptable impacts on the existing and likely future character of the locality.

The design solution is unacceptable in respect of the likely future character of the locality. The new controls permit development in the locality at a far greater height and FSR that that which was permitted by the previous planning regime or that currently exists in the locality. The proponent's expert reports acknowledge that there is unlikely to be any significant change in the urban form (character) of the locality irrespective of the recent LEP amendments:

"The historical allotment pattern of long, narrow blocks to both street frontages is still evident, particularly on the southern side of George Street. Notwithstanding the potential for urban design improvement, this pattern of subdivision has left relatively isolated, single lots (infill sites) adjacent to larger, consolidated sites already developed for commercial and related purposes. The opportunities, therefore, for 'grand scale' revitalisation of the George Street urban form are limited".

Given that:

-The proposed development is incompatible with the existing character and development pattern in the locality, and

-Any major change in the urban form of the locality is unlikely

then it can only be concluded that the development that well exceeds the maximum permissible FSR is unacceptable in respect of both the existing and likely future character / development pattern of the locality.

6.0 Inadequate -Car Parking

The proponent's expert reports reason that the proposed development complies with the LEP 2007 car parking development standards viz:

"The Traffic Report notes that application of the parking requirements specified in the local planning controls to the proposed development yields a maximum permissible off-street parking provision of approximately 125 parking spaces. The proposed development makes provision for a total of 63 off-street car parking spaces and is therefore consistent with the local planning control requirements."

The proposal does not comply with the car parking development standards. The proposed development is significantly deficient in on site car parking.

The parking provisions of the LEP are a development standard and are not a 'maximum' control, rather the development standards require a 'precise/exact' on site car parking provision.

The previous SREP 28 identified 'maximum' car parking rates, with the change in the planning regime it would seem that there was a deliberate decision to modify the CBD parking policy such that pursuant to the new LEP 2007 a 'precise' number of spaces must be provided for various uses. The proposed development is significantly deficient in on- site parking providing only 63 of the required 125 spaces. This is a deficiency of 62 spaces or approximately 50% of the parking required.

The car parking controls within the LEP were established having specific regard to the public transport access available to Parramatta and the principles of the Metropolitan Strategy. The controls are formulated to achieve a specific modal split balancing CBD parking demands with public transport patronage and, amongst other things, to maintain a component of private parking within the CBD offsetting demand for the limited public parking that is available within the city. The LEP car parking controls are well founded.

The car parking development standard can only be varied if the consent authority receives and supports written justification pursuant to clause 24 of the LEP.

In this case the non compliant car parking arises as a direct consequence of the additional floor space that the proposal attempts to achieve on the site.

There is no planning justification warranting support of such a major departure from the parking control. The inability to provide adequate car parking facilities on the site is a direct consequence of the additional floor space sought by the proponent and therefore is clearly indicative of the over development of the site.

7.0 Setbacks and Building Separation Controls

The proposed development is significantly non compliant with building setback and separation controls. The non compliances are substantially attributable to the proponent's endeavours to exceed the maximum permitted floor space on what is a very constrained site.

The inability to provide compliant setbacks is unacceptable because-

-It reduces the articulation to the building particularly on the upper levels. As a consequence the proposed development is essentially an 'uninspiring glass box clad with shading devices'.

-It compromises the amenity and future development potential of adjoining properties.

The inability of the proponent to accommodate the additional floor space on the site in a manner that at least complies with mimimum building setback and separation requirements is highly indicative of the over development of the site.

8.0 Unacceptable Impact on Trees and Inadequate Landscaping

Perth House exists in a well landscaped setting. The grounds of Perth House contain significant plantings including an old Olive Tree located in very close proximity to the development site.

The proposed development involves excavation to a depth of 4 levels to the common boundary. This is going to remove some 50% of the root zone of the olive tree and is highly likely to impact upon the root zone of other trees (noting

that the existing building on the subject site does not have a basement level and therefore does not significantly constrain the available root zone).

The proposed excavation (extent and proximity) is highly likely to compromise the well being of the tree(s) and thus the setting of Perth house.

9.0 Pedestrian circulation

The proposed design solution is based on the assumption that public access to the proposed development can and should be encouraged through No 85 George Street. The development would in fact seem to infer works are being undertaken on No 85 George Street including tree removal and paving.

No 85 George Street is a privately owned property under Strata title, it is not a public space. The owners of No 85 have not granted consent to any works and have not been approached by the owner of No 89 George Street about his development intentions. The owners of No 85 George Street strongly object to the proposed development.

The proposed development directs pedestrians into the car parking and driveway area of No 85 George Street creating the potential for conflict. This is unacceptable.

Increasing pedestrian movement through the privately owned Perth House grounds is not conducive to the tranquil setting of the current restaurant use of Perth house and is unacceptable to the owners of No 85 George Street.

The use of No 85 George Street to provide pedestrian access into No 89 George Street introduces public liability consideration for the owners of No 85 George Street. This again is unacceptable.

The pedestrian circulation promoted by the applicant is not well thought out and has been determined without consultation with the owners of the neighbouring affected property, No 85 George Street.

10.0 Summary of Non compliance with Primary Planning Controls

LEP Control	Complies	Comment
21 Height of buildings (1) The objectives of this Plan for the control of the height of buildings are as follows: (a) to allow sunlight access to key areas of the public domain by ensuring that further overshadowing of parks, the river and community places is avoided or limited during nominated times, (b) to provide high quality urban form for all buildings, (c) to maintain satisfactory sky exposure and daylight to existing buildings, to the sides and rear of tower forms and to public areas, including parks, streets and lanes, (d) to ensure that taller development occurs on sites capable of providing appropriate urban form and amenity, (e) to nominate heights that will provide a transition in built form and land use intensity within the area covered by this Plan, (f) to require the height of future buildings to have regard to heritage sites, and their settings, their views and their visual interconnections, (g) to ensure the preservation of historic views shown in the City Centre Development Control Plan. (2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.	Yes No No No Noted No No Yes	**The issue with the proposal is the unacceptable bulk mass and scale of the development and its inconsistency with the existing character/development pattern in the locality and the likely future development pattern in the locality.** **The Tanner Architects heritage review establishes that the form of the building is inappropriate having regard to the adverse impacts on Perth House, the setting on Perth House the view corridor (streetscape).** **In this instance the adverse impacts are compounded by the proponent's endeavours to over develop a considerably constrained site. The proposed FSR well over the maximum permitted by the LEP (or three storeys as advised by the expert reports) and the development does not comply with setback or building separation controls in the LEP. The endeavours to overdevelop of the site has resulted in a building forms that is unacceptable building mass, bulk and scale having regard to its existing and future context. Notwithstanding numerical compliance with the maximum permitted height control, when considered in the broader planning context the development does not achieve the primary height objectives of the LEP**

		Please also refer to section 5 of this report for detailed comments on the building form.
22 Floor space ratio The objectives of this Plan for the control of floor space ratios are as follows:		**Please refer to sections 3 and 4 of this submission for detailed comments**
(a) to ensure a degree of equity in relation to development potential for sites of different sizes and for sites located in different parts of the Parramatta city centre,	No	**The development well exceeds the permissible FSR.**
(b) to ensure that proposals for new buildings are assessed with due regard to the design excellence and built form provisions of this Plan,	No	**The proposal has NOT been the subject of the design excellent process required by the LEP**
(c) to provide sufficient floor space for high quality development for the foreseeable future,	No	**Having regard to the adverse impacts of the development identified in this submission and the Tanner architects heritage assessment the development could not be reasonably described as being 'high quality development'**
(d) to regulate density of development and generation of vehicular and pedestrian traffic,	No	**No. As a result of the excessive floor space the development is unable to provide adeaute on site parking. The development is deficient by 62 spaces or approximately 50% of the required parking. Please reef to section 6 of this report**
(e) to encourage increased building height and site amalgamation at key locations.	No	**The site is not a key location as applied in the LEP. The site is better described as having a particularly 'sensitive' location because of its immediate proximity to Perth House. The proposal is essentially asking the consent authority to endorse an excessive and non complaint FSR on a site that is constrained by its area and configuration. This**

		is precisely the situation that the controls were intended to negate. **The proposed development seeks consent to exceed the MAXIMUM permitted FSR by some 20%. The extent of variation is prohibited by the LEP (the extent of variation cannot even be achieved through the 'design excellence' provisions of clause 22). The provisions of clause 24 cannot be implemented and the provisions of SEPP No 1 do not apply. As detailed in section 4 of this report the proponent has not provided any sustainable justification for the excessive FSR.** **The additional FSR does not facilitate a 'better design outcome' and there is no reason why an appropriate design could not be achieved in a manner that complies with the FSR control and other LEP controls that establish the desired built form (setbacks, separation etc).** **The provisions of Part 3A of the Act should not be used as a tool for developers to disregard the local planning controls that in this instance and both recent and well founded.**
(2) Except as provided by subclause (3) and clause 22B, the floor space ratio of a building on any land is not to exceed the maximum floor space ratio shown for the land on the Floor Space Ratio Map. (3) The maximum floor space ratio for buildings on land for which the maximum floor space ratio shown on the Floor Space Ratio Map is specified in Column 1 of the Table, is the amount specified opposite that floor space ratio in: (a) Column 2 of the Table, if the site area for the development is less than or equal to 1,000m^2, or	No No	**The FSR of 8.55:1 is well in excess of the maximum 6.9:1 permitted by the LEP.**

(b) Column 3 of the Table, if the site area for the development is greater than 1,000m^2 but less than 2,500m^2, or (c) Column 4 of the Table, if the site area for the development is equal to or greater than 2,500m^2. **TABLE – FLOOR SPACE RATIO** **Column 1 Column 2 Column 3 Column 4** 6:1 4:1 (4 + 2X):1 6:1 8:1 5:1 (5 + 3X):1 8:1 10:1 6:1 (6 + 4X):1 10:1 (4) For the purposes of Column 3 of the Table to subclause (3): X = (the site area in square metres – 1000)/1500		
22A Minimum building street frontage (1) The objectives of this clause are as follows: (a) to ensure that, visually, buildings have an appropriate overall horizontal proportion compared to their vertical proportions,	No No Yes	**The building has a considerable bulk mass and scale and articulation is limited as evidenced by non compliance with building separation and setback controls. The building form is inconsistent with the existing character and the likely future character of the area**
(b) to ensure that vehicular access is reasonably spaced and separated along roads and lanes,	No	**This is an unavoidable consequence of developing the site as a a single entity**
(c) to provide appropriate dimensions for the design of car parking levels,	Yes	
(d) to encourage larger development of commercial office, business, residential and mixed use buildings provided for under this Plan.	No	**The proponent is unable to consolidate the site. Notwithstanding the proposal not only seeks to benefit from the site consolidation floor space incentives for site amalgamation but to significantly exceed those incentives**
(2) Development consent must not be granted to the erection of a building that does not have at least one street frontage of 20m or more on	No	**The street frontage is 18.5m**

land zoned B3 Commercial Core, B4 Mixed Use or B5 Business Development. (3) Despite subclause (2), the consent authority may grant consent to the erection of a building on land referred to in that subclause if: (a) it is satisfied that due to the physical constraints of the site or adjoining sites it is not possible for the building to be erected with at least one street frontage of 20m or more, and (b) has take into account the objectives of this clause.	No	**It is acknowledged that as the site cannot be practically consolidated then individual development might be acceptable. The resultant development however must recognise that the site is significantly constrained and positively respond to its context. Any development on the site should 9and can) be undertaken in a manner that complies with the primary controls in the LEP**
22B Design excellence (1) This clause applies to development involving the construction of a new building or external alterations to an existing building.	Noted	**The clause applies to this proposal**
(2) Consent must not be granted to development to which this clause applies unless, in the opinion of the consent authority, the proposed development exhibits design excellence.	No	**For reasons expressed in this submission and the Tanner architects Heritage report then proposed development is not considered to display "design excellence"**
(3) In considering whether development to which this clause applies exhibits design excellence, the consent authority must have regard to the following matters: (a) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,	No	**The building does not provide a high standard of architectural design**
(b) whether the form and external appearance of the proposed development will improve the quality and amenity of the public domain,	No	**The development will have an adverse impact on the streetscape and the setting of Perth House**
(c) whether the proposed development detrimentally impacts on view corridors,	No	**Please refer to the Tanner architects report**
(d) whether the proposed development detrimentally impacts on land protected by a sun access plane control established for that land in the City Centre Development Control Plan, (e) how the proposed development addresses	NA	

the following matters: (i) the suitability of the land for development,	No	**The site is not suited to the density of development proposed**
(ii) existing and proposed uses and use mix,	Yes	**The use is acceptable**
(iii) heritage and archaeological issues and streetscape constraints,	No	**Please refer to tanner Architects report**
(iv) the location of any tower proposed, having regard to the need to achieve an acceptable relationship with other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form,	No	**Please refer to sections 1, 2 and 5 of this report**
(v) bulk, massing and modulation of buildings,	No	**Please refer to the Tanner Architects report and to sections 1, 2 and 5 of this report**
(vi) street frontage heights,	No	**Refer to the Tanner architects report**
(vii) environmental impacts such as sustainable design, overshadowing, wind and reflectivity,	No	**The development will have significant shadow impacts on the school grounds. The additional FSR results in additional shadow impacts and as the site could be developed in a compliant manner then the additional shadow impact arising from the non complaint FSR must be considered unacceptable.**
(viii) the principles of ecologically sustainable development,	Yes	
(ix) pedestrian, cycle, vehicular and service access, circulation and pedestrian permeability,	No	**Pedestrian circulation is poorly considered. Please refer to section 9 of this report**
(x) the impact on, and any proposed improvements to, the public domain,	No	**The proposal will have adverse impacts on George Street and in particular is insensitive to the visual setting of Perth House**
xi) any relevant special character area statement in the City Centre Development Control Plan.	NA	

(4) Consent must not be granted to the following development to which this Plan applies unless an architectural design competition, that is consistent with the City Centre Development Control Plan has been held in relation to the proposed development:	No	**There has been no design competition.**
(a) development for which an architectural design competition is required as part of a concept plan approved by the Minister under Division 3 of Part 3A of the Act,	NA	
(b) development in respect of a building that is, or will be, greater than 55m or 13 storeys (or both) in height,	No	**The development exceeds the height threshold and thus requires a design competition**
(c) development having a capital value of more than $1,000,000 on a key site, being a site shown edged heavy black and distinctively coloured on the Key Sites Map,	NA	
(d) development for which the applicant has chosen to have such a competition.	NA	
(5) Subclause (4) does not apply if the Director-General certifies in writing that the development is one for which an architectural design competition is not required.	No	**There has been no certification from the Minister that a design competition is not required**
(6) The consent authority may grant consent to the erection or alteration of a building to which this clause applies that has a floor space ratio of up to 10 per cent greater than that allowed by clause 22 or a height of up to 10 per cent greater than that allowed by clause 21, but only if:	No	**The development exceeds the maximum permitted FSR by 20%**
(a) the design of the building or alteration is the result of an architectural design competition, and	No	**There has been no design competition.**
(b) the concurrence of the Director-General has been obtained to the development application.	No	**There has been no concurrence from the director general**
(7) In determining whether to provide his or her concurrence to the development application, the Director-General is to take into account the result of the architectural design competition (if any).	No	**Refer to above comments. There has been no design competition for the director general to consider**
(8) In this clause: ***architectural design competition*** means a competitive process conducted in accordance with procedures approved by the Director-General from time to time.	Noted	
22C Car parking (1) Consent must not be granted for any new building, or an alteration to an existing building that increases the gross floor area of the building, that is to be used for a purpose set out	No	**The development is deficient by 62 spaces being some 50% of the required 125 spaces**

in Column 1 to the Table to this clause unless the consent authority is satisfied that car parking will be provided in accordance with the requirements set out opposite that purpose in Column 2 to the Table. (2) For the purposes of this clause, the following are to be included as part of a building's gross floor area: (a) any area of the building that is used for car parking and is at or above existing ground level, (b) any area of the building that is used for car parking below existing ground level, except where the car parking is provided as required by this clause. (3) Car parking that is required to be provided under subclause (1) in relation to commercial activities must be provided on site unless the consent authority is satisfied that car parking will be adequately provided for elsewhere. (4) Council owned public car parking is not to be included as part of a building's gross floor area.	Noted No Noted	**The parking required has not been provided**
22D Building separation Buildings on land to which this Plan applies must be erected so that the separation distance: (a) from neighbouring buildings, and (b) between separate towers or other separate raised parts of the same building, is not less than that provided for in the City Centre Development Control Plan.	No	**Please refer to sections 5 and 7 of this report**
24 Exceptions to development standards (1) The objectives of this clause are: (a) to provide an appropriate degree of flexibility in applying certain development standards to particular development, and (b) to achieve better outcomes for and from development by allowing flexibility in particular circumstances. (2) Consent may, subject to this clause, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However, this clause does not apply to a development standard that is expressly excluded from the operation of this clause or of *State Environmental Planning Policy No 1—Development Standards*. (3) Consent must not be granted for	Noted Noted Noted	

development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating: (a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and (b) that there are sufficient environmental planning grounds to justify contravening the development standard.	No	**The proponent has not established that compliance is 'unreasonable or unnecessary'.** **The LEP FSR development standard CANNOT be varied by clause 24.** **The LEP standards relating to car parking, and building setbacks/separation are recent and well founded controls. They serve a specific planning purpose (objectives of controls) and are therefore perfectly 'reasonable' and 'neccessary' controls.** **The site width control might be considered to be 'unreasonable' as if strictly applied and in the absence of consolidation opportunities, the land could not be developed for the purpose intended by the zoning.** **There is no reason why a development could not be designed and constructed on the site in a manner that complies, or that achieves far greater compliance, with the LEP development standards (with the exception of site frontage discussed above). There is therefore no reason why compliance with the standards would be considered to be unreasonable or unnecessary by the consent authority.** **The variations sought in this instance do not facilitate 'a better design outcome' relative**

		to a compliant development and the development does not promote or reflect 'design excellence'
(4) Consent must not be granted for development that contravenes a development standard unless: (a) the consent authority is satisfied that:	No	**Refer to the above comments**
(i) the applicant's written request has adequately addressed the matters required to be demonstrated by subclause (3), and	No	
(ii) the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out, and	No	**The non compliance compromise rather than promote the planning objectives in the LEP.**
(b) the concurrence of the Director-General has been obtained.	No	
(4A) In addition to the matters set out in subclause (4), consent must not be granted for development that contravenes a development standard on land on which there is a heritage item unless the consent authority is satisfied of each of the matters set out in clause 35 (9) (a)–(e).	NA	
(5) In deciding whether to grant concurrence, the Director-General must consider: (a) whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and	Noted	
(b) the public benefit of maintaining the development standard, and	Noted	
(c) any other matters required to be taken into consideration by the Director-General before granting concurrence.	Noted	
(6) After determining a development application made pursuant to this clause, the consent authority must keep a record of its assessment of the factors required to be addressed in the applicant's written request referred to in subclause (3).	Noted	
(7) This clause does not allow consent to be granted for development that would contravene any of the following: (a) a development standard for complying development, (b) a development standard for development in the coastal zone.	NA	

35 Heritage conservation (1) **Objectives** The objectives of this clause are: (a) to conserve the environmental heritage of Parramatta city centre, and (b) to conserve the heritage significance of heritage items and heritage conservation areas including associated fabric, layout, settings and views, and (c) to conserve archaeological sites and relics, and (d) to conserve places of Aboriginal heritage significance. **35A Historic view corridors** The consent authority must not grant consent to development on land identified in the City Centre Development Control Plan as being within a historic view corridor unless it has taken into account the impact that the development may have on any such historic view corridor.	 No No NA NA No	**Please refer to the Tanners architects heritage assessment for detailed consideration** **Please refer to the Tanners architects heritage assessment for detailed consideration**

11.0 The Proposal is for Significant, Inappropriate and Unjustified Over development

The proposal represents over development particularly noting and as evidenced by:

- The development of the site is constrained by its limited width, small area, and poor configuration. Flooding also constrains the site.
- The development of the site is constrained by the circumstances of neighbouring development including Perth House and significant plantings within its setting.
- The proposed development significantly exceeds the maximum permitted FSR. The extent of variation sought is not permissible under the provisions of the LEP. The proponent has not provided any sustainable justification for the significant non compliance.

- The proposed development cannot comply with minimum setback and building separation controls compromising building form (articulation) and the amenity and development options for neighbouring properties
- The proposed development is very significantly deficient in on site car parking. In essence no car parking is being provided for the additional non complaint floor space sought by the proponent.
- The proposed development by virtue of the above has an unacceptable scale and form that will detract from the heritage significance of Perth House and detract from the setting of Perth House
- By virtue of the above the proposed development has unacceptable streetscape impacts and is an unacceptable response to the existing and likely future character of the locality.

12.0 Improper Use of Part 3A provisions

It is not the purpose of Part 3A of the EPA act 1979 to simply provide a mechanism for developers to circumvent local planning controls. In this particular case the Parramatta planning controls are relatively recent (2007) and have been carefully formulated to achieve State planning objectives including the objectives of the Metropolitan Strategy.

There are no circumstances relating to the development of this site that warrant the consent authority to 'all but disregard' the well thought out and well founded provisions of the PLEP 2007 and supporting DCP 2007.

There are no apparent reasons why the site cannot be developed in a manner that is intended envisaged and permitted by the local planning controls.

It would also seem that had the development on the subject land been designed in accordance with the permissible FSR then the Part 3A development cost threshold may not have been met. Again, it is not the purpose of Part 3A to circumvent local controls let alone encourage development to exceed local controls simply for the reason of achieving construction cost thresholds to enable Part 3A assessment.

Support of this proposal as a Part 3A matter sets a very dangerous and undesirable precedent for developers to circumvent local planning controls by means of part 3A simply to enable increased floor space and profit.

The cumulative impacts of such ad hoc, non-conforming development should also be considered. If this development is approved under Part 3A, and if there is consistency in the application of planning controls and provisions then, with respect, just about every property owner in Parramatta would be entitled to seek to use Part 3 to redevelopment their property in a manner that significantly exceeds permitted densities. Approval in this instance will compromise the integrity of the governing, well founded, local planning controls.

13.0 Conclusion

The proposal is considered to be inappropriate and unacceptable having regard to the provisions of the Act.

It is strongly recommended that the application be refused for the reasons identified in this submission.

Yours sincerely

Danny Jones

(Bach Urb. And reg. Planning –UNE)

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26 August 2010

The Owners—Strata Plan 74416
C/- Strata Plus Pty Ltd
Level 3, 111 Devonshire Street
Surry Hills NSW 2010

Attention: Mr Stuart Denney

Dear Stuart

SUBJECT: OBJECTION TO PROPOSED DEVELOPMENT AT 89 GEORGE STREET PARRAMATTA

We have reviewed the readily-available information relating to the proposed redevelopment of 89 George Street, Parramatta, and provide the following comments on the potential adverse impacts of the proposal on the heritage significance of Perth House and other significant elements in the vicinity. This report should be read in conjunction with relevant documents/drawings submitted with the development application (MP 09_0128). It should also be read in conjunction with the following:

- *Perth House Conservation Plan*, prepared in 1989 by Howard Tanner and Associates Pty Ltd for Condux Pty Ltd;
- The Planning Report, prepared in August 2010 by Planning Directions Pty Ltd for the owners of 85 George Street, Parramatta (The Owners—Strata Plan 74416);
- The Arboricultural Impact Assessment, prepared in August 2010 by Tree Wise Men Australia Pty Ltd for the owners of 85 George Street, Parramatta (The Owners—Strata Plan 74416);
- Parramatta City Centre Local Environmental Plan (LEP) 2007;
- Parramatta City Centre Development Control Plan (DCP) 2007; and
- *Design in Context: Guidelines for Infill Development in the Historic Environment*, prepared by the NSW Heritage Office and the Royal Australian Institute of Architects (RAIA) (NSW Chapter).

Heritage Significance

89 George Street has not been identified as an item of heritage significance and although it has been included as part of an identified Archaeological Management Unit (AMU 3102), the AMU is not considered to have any historical archaeological research potential or archaeological significance.

The proposed redevelopment at 89 George Street is located immediately adjacent to the east of Perth House, at 85 George Street, which is a place of recognised State and local heritage significance. Perth House is included on the State Heritage Register (SHR) (SHR ID No. 00155). It is also included on Schedule 5 of the Parramatta City Centre Local Environmental Plan (LEP) 2007 (Item 39) and the Register of the National Estate (RNE) (Place ID 3094). 85 George Street is also identified as an Archaeological Management Unit (AMU 2827), which has high archaeological research potential of State significance. A convict-built drain extending across the western half of 85 George Street has also been included in Schedule 5 of LEP 2007 (Item 132).

The proposed redevelopment at 89 George Street is also located immediately adjacent to the north of 100 Macquarie Street, which features an 1821 convict barracks wall and potential archaeological site extending along the boundary with 85 and 89 George Street. This significant feature has been included as a heritage item on Schedule 5 of LEP 2007 (Item 1). 100 Macquarie Street also forms part of an identified Archaeological Management Unit (AMU 2887), which has exceptional archaeological research potential of State significance.

The views along George Street from the east towards Parramatta Park gatehouse and tress is identified as an historic view in DCP 2007—see map in Appendix D of DCP 2007. A key aspect of this historic view includes the views to the streetscape and heritage items.

The conservation plan prepared for Perth House in 1989 by Howard Tanner & Associates Pty Ltd notes the following about Perth House:

- shows a high degree of creative excellence;
- demonstrates the aspirations, with regard to taste and lifestyle, of the newly emerging propertied class during the nineteenth century;
- is a fine example of medium-sized domestic architecture, and is a very intact example of a quality Parramatta residence in the neo-classical style still fashionable in the mid-nineteenth century. While the original context of such buildings can no longer be seen, they are important symbols of a sophisticated phase of residential development in Parramatta;
- has strong associations with important historical figures and with an important phase in Parramatta's development; and
- has a considerable degree of unity in its materials, form and scale and is a rare reminder of the harmonious and generally low scale architectural character once enjoyed by Parramatta's streets.

The conservation plan also includes copies of previous heritage assessments undertaken by Helen Proudfoot and Brian McDonald. Helen Proudfoot describes Perth House as a building of considerable architectural significance within the context of Parramatta's history and architectural heritage. It has a certain 'jewel-like' quality. With regards to its contribution to the Parramatta Streetscape Helen Proudfoot states:

> *Perth House has long been a landmark building in Parramatta, even in the days when there were numerous Colonial buildings remaining. With its simple facade, and fine detailing, it has stood as an epitome of its style. It is close enough to the street to make a considerable impact, and with its huge, sheltering Moreton Bay Fig Tree alongside, has survived as a notable Colonial landmark. A contribution to the effect is the presence of the Wild Olive tree on its southern (eastern) side.*
>
> *The change in scale along George Street has been dramatic in the past ten years (c1988), with one of the biggest buildings, the Ferguson Centre, located directly opposite Perth House. The only building of comparable age, style and scale nearby is Harrisford, in the next block, but this building, though fine of its type, does not have the impact upon the streetscape that Perth House does, which adds a human scale to a now-commercial streetscape. Perth House has a jewel-like quality within the 1986 context, and its immediate setting, particularly the trees on each side, close to the footpath, are very important to it.*

Helen Proudfoot's report includes the following Statement of significance:

> *Perth House, 85 George Street, Parramatta, is a building of considerable historic and architectural significance within the context of Parramatta's local history and early architectural character.*

It is a building of instantly-recognisable Colonial character with a simple outline, but at the same time considerable sophistication in its detail. It could be said to stand as an epitome of the late-Colonial style of domestic architecture in New South Wales and to possess a certain "jewel-like" quality because of this.

It has been associated with a number of important local figures and families: George Oakes, James Houison, the Houison family, and the Crouch and Marshall families.

Though it has lost its early kitchen building, the barn/coach-house (the Stables) is still intact. It adds a human scale to Parramatta's George Street, now in the process of being largely re-built with large commercial structures.

The history of the site is also of interest, being Crown Land until 1846, with a house called "Rose Cottage" on the site, occupied by Mr Aird, superintendent of Government Building at Parramatta, pre-dating Perth House itself. The route of a large Barrel Drain (1822-1828) crosses the corner of the site.

Brian McDonald states the following:

Perth House is significant as a surviving example of Parramatta's early townscape character. Because the site has changed so dramatically it can only be seen as a reminder of the early townscape standing alone in a new commercial development precinct. The existing modern development nearby was designed without any thought of historic continuity and therefore has removed from around Perth House all traces of Parramatta's former status as one of the earliest settlements in the colony.

The more recent conservation management plan prepared for Perth House by Conybeare Morrison in November 2004 includes the following Summary Statement of Significance:

Perth House and Stables, 85 George Street, Parramatta, a Victorian Georgian residence and outbuilding has rare and early aspects associated with historic, aesthetic and scientific significance at local and State level. The place has historic associations that reflect early development and changing pattern of use in central Parramatta. The earliest phase includes convict built huts and convict-built brick barrel drain. Rose Cottage, a substantial convict-built timber residence for the superintendant of Convicts and Public Works at Parramatta replaced the convict huts. Perth House with associated outbuildings was constructed in the late 1840s as a private residence and replaced Rose Cottage. Perth House was later used as a private ladies cottage, boarding house, commercial office, funeral parlour and restaurant.

Perth House is associated with prominent persons including George Oakes, a local Parramatta and state politician, who first owned and built Perth House; James Houison, a local politician and prominent Sydney builder/architect active in the Parramatta area and believed to have designed and built Perth House for George Oakes; and William Aird, superintendant of Convicts and of Public Works at Parramatta from 1 January 1825, who lived in Rose Cottage, a former residence of the site.

Perth house has aesthetic significance as a fine representative example of Victorian Georgian style residence dating from the late 1840s. The house is representative of the style with symmetrical facades and planning, 'reasonable' proportions, exposed stonewalling, slate roof, simple chimney forms, verandahs with slender timber posts, twelve-pane sash windows, louvred timber shutters and significant interior finishes including the high quality polished cedar door and window joinery and fire surrounds. Perth House with flanking fig trees is a strong contributory element in the significant urban streetscape of George Street, Parramatta, and a rare surviving element of early Parramatta.

Perth House has scientific significance associated with the archaeological potential of the remains of convict built huts and cottage located beneath the footprint of Perth House together with the convict built brick barrel drain located under the drive to the west of the house.

The Statement of Significance for Perth House included in the RNE citation is as follows:

> *A Victorian Georgian house, complete with its coach house, which is important for its associations with the early development of Parramatta (Criterion A.4). It is one of the few houses in Parramatta to survive from this early period (c1840) (Criterion B.2). The house is architecturally significant as a fine, intact example of the Victorian Georgian style (Criterion F.1). It makes a considerable aesthetic contribution to the townscape (Criterion F.1). The house has historic associations with the original owner, George Oakes, who was one of the first public figures in Parramatta to be involved in the Local Government movement and went on to represent Parramatta in the Legislative Assembly (Criterion H.1).*

The Statement of Significance in the SHR and LEP listings are identical. They are as follows:

> *Association with notable events or people – Houses associated with notable people site possesses potential to contribute to an understanding of early urban development in Parramatta Professional, trade and manufacturing practice – example of an intact house.*

In summary, Perth House is considered to be of heritage significance for the following reasons:

- Perth House is a rare surviving example of a quality residence in Parramatta that also provides rare evidence of the early development and townscape character of the city centre. In particular, it provides tangible evidence of the low-scale architectural character of Parramatta during the nineteenth century.
- Perth House has strong associations with important historical figures in the history and development of Parramatta and New South Wales.
- Perth House (including the Stables, Moreton Bay Fig Tree and Wild Olive Tree within its immediate setting) is a notable Colonial landmark in Parramatta that also makes a significant contribution to the George Street streetscape. The fig tree and Wild Olive have significant streetscape value in their own right.
- Perth House is a fine and very intact example of a quality residence in Parramatta and of medium-sized domestic architecture in NSW. It has a high degree of technical excellence and a considerable degree of unity in its materials, form and scale.
- Perth House (including the Stables, Moreton Bay Fig Tree and Wild Olive Tree) is held in high regard by the local community for its contribution to the history and architectural heritage of the city centre. Along with the other early nineteenth century buildings in Parramatta, Perth House is also likely to be held in high regard by the wider Sydney and NSW community as tangible evidence of Sydney's colonial history.
- 85 George Street has high archaeological research potential of State significance. The site contains known remnants of an 1822 convict-built drain and is likely to contain other sub-surface remains of early convict-built structures.

Heritage Curtilage and Setting for Perth House

Heritage curtilage is defined in the publication *Heritage Curtilages*, prepared by the Heritage Branch, NSW Department of Planning in 1996 as 'The area of land (including land covered by water) surrounding an item or area of heritage significance which is essential for retaining and interpreting its heritage significance'. The term 'heritage curtilage' is also used by the Heritage Council of NSW to describe the area listed on the State Heritage Register (SHR) or on a local environmental plan. Within this context the current heritage curtilage for Perth House is the lot boundary for 85 George Street.

The lot boundary curtilage of 85 George Street does not include the Moreton Bay Fig tree, which has a strong historical and visual connection with Perth House—the tree is located on the adjoining property to the west, which originally formed part of the property containing Perth House. This tree nevertheless forms part of the immediate setting for Perth House, as do the Stables and Wild Olive tree.

As previously noted, Perth House provides rare evidence of the early development and townscape character of the city centre. In particular, it provides tangible evidence of the low-scale architectural character of Parramatta during the nineteenth century. The ability of Perth House to demonstrate this earlier townscape character is currently assisted by the existing low-scale development to the east (89 George Street) and building setbacks to the west (83 George Street) and therefore development within these lots has the potential to impact the heritage significance of Perth House. These adjacent properties are therefore considered to form part of the wider setting (or visual catchment) of Perth House when viewed from George Street.

Assessment of Heritage Impacts

The proposed development at 89 George Street involves demolition of the existing single-storey commercial structures on the site and construction of a 13 storey commercial building with four basement car parking levels. The new building would have a tall, narrow block form extending across the full width and depth of the site to a height of 55 metres above the existing ground level. The ground floor includes a loading dock and car park entry driveway (and roller door) onto George Street as well as a cafe/restaurant along the western edge, fronting Perth House. The proposal also provides for visual and pedestrian access to the areas in and around Perth House on the adjoining private land.

The proposed redevelopment of 89 George Street is unlikely to have any direct physical impact on the fabric of Perth House, the stables or the Moreton Bay Fig tree. It would, however, have the potential to result in substantial adverse heritage impacts on the immediate and wider setting of Perth House and on the heritage significance of other elements in the vicinity. These impacts are discussed below.

The Scale of the Proposed New Development

- The scale (height/bulk/density) of the proposed new 13 storey building would overwhelm the single-storey domestic character of Perth House (and the Wild Olive tree)—a key aspect of its significance. The scale of the proposed new building would also impact the Colonial landmark qualities of Perth House and the contribution that it (and the Wild Olive tree) makes to the overall character of the city centre and George Street streetscape.

  As discussed previously, the adjoining properties, including 89 George Street, form part of the wider setting (or expanded cartilage) of Perth House. The substantial height and bulk of the proposed new building would adversely impact the wider setting of Perth House and its ability to demonstrate the low-scale architectural character of Parramatta during the nineteenth century. This substantial adverse impact would be irreversible and would be compounded should the proposed new development become a precedent for future development at 83 George Street.

  While the proposed boundary setbacks may represent some minor improvements to the side and rear of Perth House, the proposed new building would tower over Perth House (and the Wild Olive tree) and dominate the domestic-scaled external spaces to the side and rear. These traditionally more private spaces would be further impacted by the proposed opening up of views into them, and the provision of direct pedestrian access to them from the ground floor of the proposed new building.

  The scale of the proposed new building is contrary to the conservation policies in the 2004 CMP for Perth House. Policy 6.6.4 includes 'Heights of any proposed buildings in close proximity to Perth House and

Stables should not diminish the heritage item'. Policy 6.6.4 also includes 'Perth House and Stables has been dwarfed by the 7-storey Office Tower, designed by Jackson Teece Chesterman Willis & Partners and located to the south of the site. The cement rendered and painted building forms an imposing backdrop to the building. This level of development should not create a precedent for further development either on the site or one (sic) the adjoining properties'. The scale of the proposed new building would substantially diminish Perth House and its ability to demonstrate the low-scale architectural character of Parramatta during the nineteenth century as well as its significant contribution to the overall character of the city centre and to the George Street streetscape.

- The scale of the proposed new building would be significantly greater than Perth House making it contrary to the development controls within the Parramatta City Centre DCP (DCP) 2007—see Section 7.0 of DCP 2007. In particular, the proposed new building is inconsistent with the following Conservation Criteria:
  - Criterion A: Scale—the scale and bulk of the proposed new building is substantially greater than that of Perth House. The proposed treatment of the foyers, setbacks and lower levels would do little to mitigate the far taller scale of the proposed new building when viewed from George Street.
  - Criterion B: Siting—while this criterion relates more to development of heritage items it can also apply to development in the vicinity of heritage items. The existing building at 89 George Street is of a scale and setback that does not adversely impact the significant contribution to the streetscape made by Perth House and the Wild Olive tree. A substantially taller street facade would result in adverse heritage impacts on Perth House and its contribution to the streetscape.
  - Criterion C: Architectural Form—the proposed new building would provide a substantially taller 'backdrop setting' to Perth House than that currently existing at 89 George Street and to the rear of 85 George Street. The verandah ground floor foyer would do little to mediate the additional impacts of the proposed new building and its taller 'backdrop setting'.
  - Criterion E: Materials and Finishes—the proposed powder coated aluminium and transparent glazing on the higher levels of the building would be incompatible with the materials and finishes of Perth House and would not mitigate the impacts of the height of the 'neutral backdrop' for Perth House.
  - Criterion I: Curtilage—the proposed new building would result in substantial adverse impacts on the immediate and wider setting (expanded curtilage) of Perth House and its ability to demonstrate the low-scale architectural character of Parramatta during the nineteenth century.
  - Criterion J: Infill—the proposed new building has a substantially larger mass than Perth House, which would adversely impact the existing domestic character of Perth House and its contribution to the overall character of the city centre and the George Street streetscape.
  - Criterion M: Development in the Vicinity of Heritage Items—while existing views and vistas to Perth House would be retained, the substantially larger scale and massing of the proposed new building is incompatible with Perth House.
- The proposed new building is inconsistent with the Heritage Branch, Department of Planning guidelines: *Design in Context: Guidelines for Infill in the Historic Environment*. These guidelines require that infill development respond sympathetically to the scale (height/bulk/density/grain) of the setting of significant buildings. As noted previously, the substantially larger scale of the proposed new building would result in significant adverse impacts on the domestic character of Perth House and on its ability to demonstrate the early development of Parramatta as well as its significant contribution to the overall character of the city centre and to the George Street streetscape.

Excavation Works

- The excavation for the basement level car parking has high potential to impact the health of the significant Wild Olive tree, which makes a substantial contribution to the immediate setting for Perth House and to the streetscape. The two separate arboricultural impact assessments (AIAs) prepared by The Arborist Network for inclusion with the Environmental Assessment and by Tree Wise Men, conclude that while some tree roots would need to be cut this should not impact the health of the tree. This conclusion is heavily based on the assumption that appropriate protective measures would be put in place before and during the construction works and that they would be successful. It would be a far better solution to avoid the risk altogether by amending the layout of the northwest corner of the basement level car parking to avoid excavation within the Tree Protection Zone for the Wild Olive tree.

  The Arborist Network AIA considers transplantation of the tree as a potential cost-effective alternative to retention in situ. This should not occur, as it would result in more substantial adverse impacts on the contribution that the tree makes to the immediate and wider setting of Perth House and to the streetscape.

- The method of piling on the boundary with 85 George Street has not been identified. However, there is a potential need for the use of earth anchors, which would necessarily extend into 85 George Street. Subject to the number, location and extent of such anchors, they have potential to further impact the viability of the significant Wild Olive tree and the footings of Perth House as well as the significant historical archaeological resource at 85 George Street. These potential impacts have not been addressed in the NBRS+Partners SOHI and measures to avoid, mitigate or minimise potential impacts have not been identified.

- It is possible that the other trees at 85 George Street in close proximity to the boundary would not survive the excavation required for the basement level car parking. While they may not be of heritage significance, they have helped to screen the blank wall of the existing building at 89 George Street and have provided visual separation for Perth House from 89 George Street. They have also helped to retain the more domestic-scaled character of the side and rear spaces of Perth House. The loss of these trees, combined with the proposed opening up of views to the side and rear of Perth House would result in additional adverse heritage impacts on Perth House.

Diversion of Sewer Pipe

- A sewer pipe extending across 85 George Street and 89 George Street would need to be diverted as a result of the proposed new development. There is no indication that the diversion would occur entirely on 89 George Street. Impacts on the State significant historical archaeological resource of 85 George Street are therefore likely to occur. These potential impacts have not been addressed in the NBRS+Partners SOHI and measures to avoid, mitigate or minimise potential impact have not been identified.

Construction Works

- Construction works (excavation for the basement level car parking, vibration and movement of machinery) may affect the structural integrity and fabric of the 1821 convict barracks wall immediately south of the development site. These potential impacts have not been addressed in the NBRS+Partners SOHI and measures to avoid, mitigate or minimise potential impact have not been identified.

Other Works

- The site plan shows paving extending around the significant historic olive tree and extending across the property boundary into 85 George Street. The impact of this paving on the health of the tree was not addressed in the AIA report prepared by The Arborist Network. Any paving that is proposed to extend across the site boundary should be deleted from the proposal as it may impact the health of the Wild Olive tree and the immediate setting of Perth House.

The NBRS+Partners Statement of Heritage Impact

The following observations are noted about the NBRS+Partners Statement of Heritage Impact (SOHI) that accompanied the Environmental Assessment:

- The SOHI states that the 1991 building to the south of Perth House 'had been seen as an acceptable design solution by the authors of all earlier impact assessments and the conservation plan...' While the earlier impact assessments supported the proposal, the 1989 conservation plan was drafted once the Heritage Council of NSW had already endorsed the proposal. It therefore included recommendations to mitigate the heritage impacts. (It should also be noted that the 2004 CMP states that the 1991 building 'dwarfed' Perth House and formed 'an imposing backdrop'. It included a conservation policy that the level of development associated with the 1991 building 'should not create a precedent for further development either on the site or one (sic) the adjoining properties.') Regardless, it is wrong to imply/suggest that support provided 20 years ago for a seven storey building set well back from the rear of Perth House translates to contemporary support of a thirteen storey building on George Street, immediately adjacent to the principal elevation of Perth House. The adverse heritage impacts of the proposed new commercial building at 89 George Street are substantially greater than those associated with the 1991 building.
- The SOHI notes that the Parramatta City Centre Local Environmental Plan (LEP) 2007, which allows for substantial height and density provisions within the city centre, was prepared 'in light of the heritage items within the area but also of the significant views and vistas within the city centre'. While provisions for substantial heights and densities across the City Centre are provided for in the LEP and Parramatta City Centre Development Control Plan (DCP) 2007, the LEP and Section 7.0 of the DCP also include heritage provisions/controls that require any development proposal to retain and enhance the heritage curtilage and setting of a heritage item. As noted previously, the proposed new building at 89 George Street would have a significant adverse impact on the immediate and wider setting of Perth House.
- The SOHI finds that 'The site analysis and resulting proposal has taken into account the adjacent heritage item—Perth House and Stables—and provides an improved setting for the Perth House than that which exists.' While the proposal would retain existing views of Perth House from George Street, with some minor improvements to the view of the Wild Olive tree it would have a substantial adverse impact on the wider setting of Perth House and its ability to demonstrate the low-scale architectural character of Parramatta during the nineteenth century. It would also impact the significant contribution of Perth House to the overall character of the city centre and to the George Street streetscape.
- The SOHI finds that 'The proposal replaces the intrusive backdrop to Perth House when viewed from the east (west?) currently provided by 91 George Street with a more articulated façade with increased setbacks and transparency at lower levels.' The six storey building at 91 George Street, while unsympathetic, is located far enough away so as to have minimal impact on the immediate and wider setting of Perth House. Further, even though the proposed new building would provide some minimal improvements to the existing ground level on the boundary with 85 George Street, the overwhelming scale of the proposed new building would result in substantially greater adverse impacts on Perth House and its immediate and wider setting.
- The SOHI finds that 'there are no aspects which could detrimentally impact on heritage significance.' The proposed new building would result in significant adverse impacts on the heritage significance of Perth House. It may also result in adverse impacts on the 1821 convict barracks wall on the boundary with 100 Macquarie Street and on the State significant historical archaeological resource at 100 Macquarie Street and 85 George Street.

- The SOHI finds that 'Early consultation has allowed the heritage issues to be integrated and mitigated in the concept design which preceded the project application. The resulting application is a sympathetic solution'. While some measures may have been integrated into the proposal they do very little to mitigate the substantial adverse impacts on the heritage significance of Perth House associated with the overwhelming scale of the proposed new building.
- The SOHI concludes that 'the proposed project does not significantly, adversely impact upon the identified heritage significance if the adjoining heritage item—Perth House and Stables. Views to and from the heritage item are retained and enhanced and the physical conservation of the Wild Olive Tree (an element of its setting) is specifically provided for in an Arboricultural Impact Assessment.'

  It is our opinion that the proposal would result in significant adverse impacts on the heritage significance of Perth House. It may also result in adverse impacts on the heritage significance of the 1821 convict barracks wall on the boundary with 100 Macquarie Street and on the State significant historical archaeological resource at 85 George Street.

  The existing views to Perth House from along George Street would be retained, however, enhancement through building setbacks at the ground floor level would be minimal. Some new views may be created from within the proposed new building, however, these are also likely to be limited due to the existing screening vegetation on 85 George Street. They would also impact the use and interpretation of the traditionally more private domestic-scale nature of the spaces to the site and rear of Perth House.

  Although the Arboricultural Impact Assessment (AIA) submitted with the Environmental Assessment does provide potential protective measures for the Wild Olive tree these would need to be carefully implemented throughout the construction of the proposed new building to avoid any physical impacts to the tree. As noted previously, it would be a far better outcome to avoid the impacts altogether by redesigning the basement level car parking to avoid excavation within the tree protection zone of the Wild Olive tree.

Conclusions and Recommendations

The proposed new building is located immediately adjacent to the east of Perth House, which is a place of State and local heritage significance. 85 George Street is also identified as an Archaeological Management Unit (AMU 2827), which has high archaeological research potential of State significance. A convict-built drain extending across the western half of 85 George Street has also been included in Schedule 5 of LEP 2007 (Item 132). The proposed new building is also located immediately adjacent to the north of 100 Macquarie Street, which features an 1821 convict barracks wall and potential archaeological site extending along the boundary with 85 and 89 George Street. 100 Macquarie Street forms part of an identified Archaeological Management Unit (AMU 2887), which has exceptional archaeological research potential of State significance.

The existing lot boundary forms the boundary of the State Heritage Register (SHR) Listing for Perth House and is therefore currently considered to be its heritage curtilage. The immediate setting for Perth House includes the Moreton Bay Fig tree and the Wild Olive tree. Perth House provides rare evidence of the early development and townscape character of the city centre. In particular, it provides tangible evidence of the low-scale architectural character of Parramatta during the nineteenth century. The ability of Perth House to demonstrate this earlier townscape character is currently assisted by the existing low-scale development to the east (89 George Street) and building setbacks to the west (83 George Street). The adjacent properties are therefore considered to form part of the wider setting (visual catchment) of Perth House when viewed from George Street.

The proposed redevelopment of 89 George Street, Parramatta would result in substantial adverse impacts on the heritage significance of Perth House, a place of recognised State and local heritage significance. The scale (height/bulk/density) of the proposed new building would overwhelm the low-scale domestic character of Perth House. It would also result in a substantial adverse impact on the immediate and wider setting of Perth House and its ability to demonstrate the low-scale architectural character of Parramatta during the nineteenth century as well as its significant contribution to the overall character of the city centre and to the streetscape. Other potential adverse impacts have been identified associated with the Wild Olive tree, the 1821 convict barracks wall to the south of the development site and the historical archaeological resource of 85 George Street.

The scale of the proposed new building is contrary to the conservation policies in the 2004 CMP, the heritage provisions of the Parramatta City Centre LEP 2007, the Parramatta City Centre DCP 2007 and the *Design in Context: Guidelines for Infill Development in the Historic Environment*. The proposed redevelopment may also set a precedent for development to the west of Perth House (and to the rear of 85 George Street), which would result in additional and irreversible impacts on the immediate and wider setting of Perth House.

The full range and extent of potential heritage impacts were not adequately addressed in the NBRS+Partners Statement of Heritage Impact and the effectiveness of 'mediating' measures overstated. Of particular concern is the assessment of the impacts associated with the substantially larger scale of the proposed new building.

The impacts of the proposal may be partially mitigated by the following:

- The height of the street frontage of the proposed new building should be reduced to a maximum of three storeys and the front setback for the upper levels should be increased to match the front face of the rear building at 85 George Street. This would reduce the scale of the proposed new building when viewed from George Street and therefore reduce its impacts on Perth House and its immediate and wider setting.
- The northwest corner of the basement level car parking should be redesigned to avoid the need for any excavation within the tree protection zone of the Wild Olive tree. In addition, appropriate measures should be out in place to protect the Wild Olive tree (and the screen trees to the rear of Perth House) during construction. The protective measures should be detailed as part of any development approval and be subject to strict oversight by a qualified tree arborist.
- Diversion of the sewer extending across 85 and 89 George Street should occur within the boundaries of 89 George Street to avoid impacting the State significant archaeological resource within 85 George Street.
- Appropriate measures should be put in place to protect the 1821 convict barracks wall. The protective measures should be detailed as part of any development approval and include measures to avoid damage due to deep excavation in the immediate vicinity and vibrations.

This report should be forwarded to the Department of Planning for their consideration.

Yours sincerely

TANNER ARCHITECTS PTY LTD

Megan Jones
Director

Stuart Denney

From: Peter Castor [peterc@treewisemen.com.au]
Sent: Tuesday, 24 August 2010 7:30 PM
To: Stuart Denney
Subject: 89 George Street Parramatta - Impacts on Olive Tree at 85 George Street

Stuart,

Below is a synopsis of the key arboricultural issues associated with the proposed development at 89 George Street and the retention of the Olive Tree located in the northeastern corner of 85 George Street.

The Tree.
The tree is an exotic species, Olive Tree, *Olea europaea.* It is likely to be 50-60 years of age however historical records may confirm a more accurate planting date. The tree is in good vigour and condition. The canopy spread was measured as 9m North, 8m South, 7m West and 4m East. The trunk diameter (@1.4m a.g) was 923mm (Tree Protection Zone (TPZ) radius 11.0m). Trunk diameter above the root buttress (@0.5m a.g) was 940mm (Structural Root Zone (SRZ) radius 3.3m). Tree height was 11m. It has been previously pruned back to the boundary over the roof of the existing Better Brakes, single storey facility at 89 George St. There were several pruning wounds 100-150mm in diameter to a height of 8m a.g. The last pruning appeared to be >5 years ago with regrowth 2-3m to the east. The tree has survived the construction of the concrete block wall of the Better Brakes building at the common boundary between the two properties. The top of the footing for this wall was located at 300mm below mulch level at 85 George Street. The depth of this footing is unknown but is likely to 500-600mm. Most of the roots (particularly the feeder roots) will have been confined by this existing wall on the boundary. Roots may be found at greater depths in this locality (Blacktown Soil Landscape) depending upon the level of previous soil disturbance.

No detail survey has been supplied or reviewed. The centre of trunk of the tree was measured at 1.3m from the eastern boundary, 6.9m from the northern boundary, 3.8m from the verandah footing and 6.3m from the Perth House building proper.

There were several existing hydraulic services observed within the canopy spread of the tree. The tree has survived the installation of these services which are likely to be associated with the 1980s office tower to the south of Perth House. There was a semicircular dwarf wall at an offset of 1.5m from centre of trunk.

This specimen did not appear to have produced any viable seed (olives). It may be a select sterile variety. There were no observed seedlings growing in the mulch layer adjacent the tree which is common for Wild (African) Olive, *Olea europaea var Africana.*

Olive Trees are hardy, drought tolerant, long-lived trees. They are tolerant of a moderate amount of crown pruning and root pruning. The timber is extremely dense and live limb drop is rare.

The only other significant vegetation adjacent the Olive Tree was a boundary planting of numerous 5-6m tall, Giant Bird of Paradise, *Strelitzia nicolai.*

The proposed development.
The proposed development is described in supplied Wood Bagot architecturals, concept Materiality and Landscape drawings, NBRS + Partners Heritage Report and the Dept of Planning Major Projects (MP 09-0128) web listing. An Arboricultural Impact Assessment Report prepared by Mark Hartley has also been reviewed.

Section CC (A3102/P9) shows 4 levels of Basement carparking virtually to the western boundary (piling width is likely to take up the indicated shaded zone) in line with the Olive tree. The method of piling at the western boundary is not known. It is likely all the crown overhang will need to be pruned back to the boundary to allow for piling machinery. Section CC does not show the Olive Tree. The building setback from the boundary is 4m (to Level 2) and 2m (from Levels 2-5). There is space for regrowth back to the east to the 4m spread that currently exists over the proposed Ground Floor and Level 1 areas.

Earth anchors associated with the piling works may be required beneath the tree and beneath 85 George Street. Given the cross sectional area of these anchors no likely impact is expected on tree health or longevity. Where possible pile centres should be varied to allow for the centre of trunk of the Olive Tree. Accurate survey of the tree trunk centre needs to be undertaken if it does not appeared on the detail survey. The Ground Floor GFA plan

(A2230/P9) shows the semi-circular dwarf wall adjacent the Olive tree. Although the Ground Floor paving is matching existing ground lines the Basement beneath is to the western boundary as shown on Section CC (A3102/P9).

There are inconsistencies within the drawings in that some show the Olive Tree (A3001/P9, A2216/P9, whilst other drawings (A3102/P9, A3104/P9) do not. This needs to corrected to avoid confusion regarding tree retention.

The Arboricultural Impact Assessment Report by Mark Hartley.
The transplanting discussion should be disregarded. If the Olive Tree was to be transplanted off-site the canopy would need to be drastically pruned (a trunk transplant) to allow for the transportation thus destroying the amenity value of the tree.

The current proposal will require pruning of the roots (if they have grown under the existing footing) and canopy at the common boundary. Given the tree's current good vigour and condition it should survive the construction if appropriate tree protection measures are implemented.

It is unclear what construction works *"that may be required to be performed from the Perth House side of the property."* (Executive Summary, page 4). Earth anchors as part of the piling works are likely to be required in the vicinity of the tree. Allowance should be made for trunk centre with the placement and depth of the earth anchors. Anchors should be as as deep as possible and as far as possible from the tree centre.

Although the piling works are proposed to the boundary at approximately 1.3m from trunk centre within the SRZ of 3.3m it is likely the roots have been previously cut and now partially confined by the existing boundary wall.

All reference to the Critical Root Zone (CRZ) should be replaced by Structural Root Zone (SRZ) as described in AS4970:2009, *Protection of Trees on Development Sites*. The SRZ of 3.3m for the subject Olive Tree is less than the CRZ of 4.6m.

The Tree Protection Plan (Recommendations) described at page 17 and 18 of the Mark Hartley report should be implemented to ensure the survival of the tree. Specific construction-stage Hold Points should additionally be established (condition of development consent) requiring the Project Arborist and the PCA to certify that the tree protection measures have been implemented.

The Tree Protection Plan (Appendix 1) should be amended to show the key tree protection recommendations. The Tree Protection Plan (drawing) should be incorporated into the Construction Management Plan.

If the Generic Tree Protection Guidelines (Appendix 2) are to be used the following amendments should be made: Primary Root Zone (PRZ) should be changed to Tree Protection Zone (TPZ) and Critical Root Zone (CRZ) should be changed to Structural Root Zone (SRZ) as per AS4970:2009.

Conclusion.
I am of the opinion that if appropriate tree protection measures are implemented the Olive Tree will survive the proposed development (Revision P9, architecturals by Woods Bagot).

If there are any queries please contact.

Regards,
Peter Castor

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