

17 June 2024

Our Ref: R/2024/5
File No: 2024/356221
Your Ref: SSD-49320959

Tuong Vi Doan
Senior Planning Officer
Social and Infrastructure Assessments
Department of Planning, Housing and Infrastructure

Via Major Projects Planning Portal

Dear Vi,

SSD-49320959 – Environmental Impact Statement – Rosebery Seniors Living

Thank you for your correspondence dated 22 May 2024 inviting the City of Sydney (the City) to comment on the abovementioned State Significant Development Application.

The proposed development involves the construction of a seniors living housing development across six buildings including 170 independent living units and a 34-bed residential care facility at 22-40 Rosebery Avenue and 108 Dalmeny Avenue, Rosebery. The development also involves the delivery of community infrastructure including the dedication of land across the southern side of the site in the form of 8m wide laneway and a creation of a 4m wide through site link (easement) across the northern side of the site.

The City objects to the proposed development, in part, and provides the following comments for consideration.

Community Infrastructure

The application is accompanied by a public benefit offer which seeks to provide community infrastructure to achieve the 1:1 floor space ratio bonus in Clause 6.14 in the Sydney Local Environmental Plan 2012 ('SLEP 2012'). The additional floor space cannot be utilised unless the provided community infrastructure is to the satisfaction of the City. The application cannot be finally determined until such time that a satisfactory voluntary planning agreement (VPA) has been exhibited and entered into with the City. **The City objects to the proposed development on this basis** as this has not yet been finalised.

The City may make further submissions regarding the proposed public benefit offer and VPA until such time that the VPA has been negotiated and entered into.

Any land intended to be dedicated to the City is to be unencumbered. The land is required to be fully remediated and is not to be subject to any onerous Long-term Environmental Management Plan ('LTEMP').

The proposed works relating to land to be dedicated to the City is to be approved as subdivision works so that the City will be the responsible certifier in accordance with 6.12 of the Environmental Planning and Assessment Act 1979 ('Act').

Conditions will be required to be imposed requiring public domain plans to be submitted to the City's Public Domain unit for approval prior to the issue of a subdivision works certificate or commencement of subdivision works, whichever is earlier.

Design of Dedicated Land – southern laneway

The architectural plans identify the southern land dedication as a 'Pedestrian/Cycleway'. The plans are to be amended reflect the intended road design which includes a single vehicle lane (east to west) as required by Section 5.7.1.1 of the Sydney Development Control Plan 2012 ('SDCP 2012').

Figure 5.174
Section B - 12m
Street

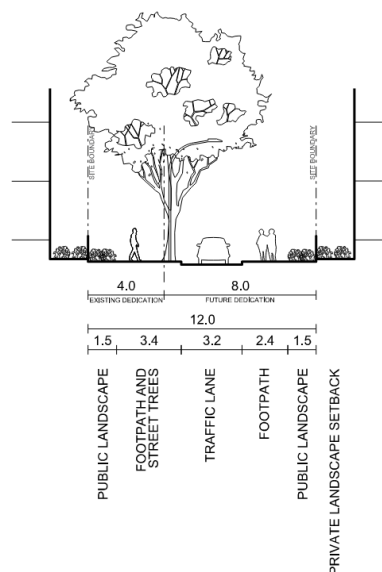


Figure 1: Section through southern land dedication

The proposed design includes trees within the footpath along the northern side of the traffic lane. These trees are to be relocated to the southern side of the vehicle lane within the garden bed in accordance with Figure 1 above so that a continuous footpath can be provided along the northern side of the traffic lane. This may require some works on council land within the existing dedicated land portion, however, may be facilitated as part of the VPA as integration works.

Landscaping along the laneway should achieve 70% tree canopy coverage in accordance with the City's Urban Forest Strategy.

Swept path analysis are to be provided for one-way laneway and its intersections with Dalmeny Avenue and Rosebery Avenue.

Design of Through Site Link – northern pedestrian path

The DCP does not provide an indicative design for the required through site link. However, it is expected that the through site link will be well defined to create a legible, inviting and safe pedestrian and cycling link between Roseberry Avenue and Dalmeny Street. The shared pathway should provide a straight connection.

It is noted that a private road is proposed at the Dalmeny Avenue end to enable servicing access to a future development at 12-20 Rosebery Avenue. This should be designed as a share way with pedestrians provided priority. All vehicles should be able to leave 12-20 Roseberry Avenue in a forward direction.

The path should have a minimum width of 2m, however, Transport for NSW cycling design toolbox calls for 4m.

Appropriate conditions are required to ensure that an easement is provided for public access and should form part of the VPA.

Floor Space Ratio and Height

The application seeks to rely on the Section 87(2)(b) of SEPP (Housing) 2021 ('Housing SEPP') to achieve an additional 25% floor space above the base permitted under SLEP. At the outset, it should be understood that it may not be possible to achieve the full extent of the floor space ratio bonus as the resultant built form may have unanticipated and unsupportable impacts on the amenity of the surrounding properties.

Notwithstanding in order to achieve the bonus FSR, certain conditions are to be met, firstly regarding the use of the development for the purpose of a residential care facility and independent living units and secondly, at subsection (2)(c)

“the development will result in a building with a height of not more than 3.8m above the maximum permissible building height.”

The site is subject to varying height of building development standards as shown in Figure 2 below. The 3.8m additional height is also calculated in Table 1 further below.

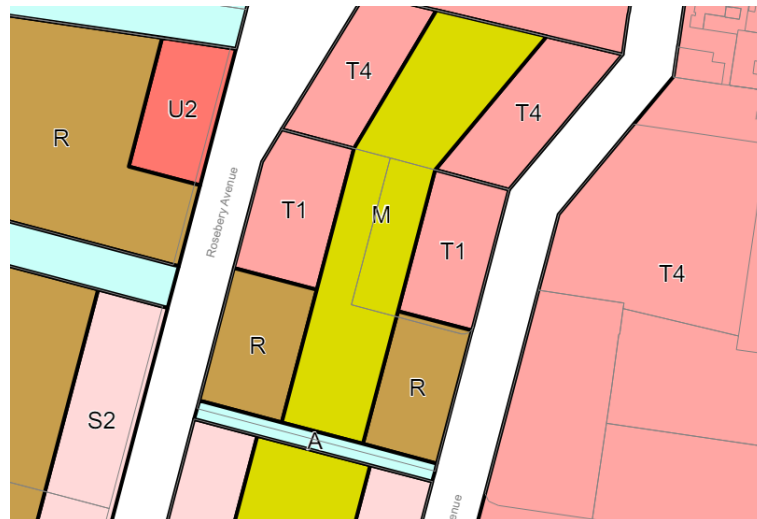


Figure 2: Extract from SLEP 2012 Height of buildings map

Area of site	SLEP 2012 Clause 4.3 HoB development standard		Including SEPP Housing Section 87(2)(c) +3.8m
Central corridor	M	12m	15.8m
Northern portion	T1	25m	28.8m
Southern portion	R	22m	25.8m

Table 1: Relevant height standards

The proposed development does not comply with subsection 87(2)(c) and is accompanied by a written request to vary the development standard pursuant to Clause 4.6 in SLEP 2012.

The proposed height variations occur for buildings A, B and C and range from 0.4m (1.3%) to 2.5m (9.68%).

The written request is considered inadequate to demonstrate that compliance with the development standard is unreasonable and unnecessary, and that there are sufficient environmental planning grounds to justify the variation.

Insufficient analysis has been provided to assess the potential impacts of the proposed height non-compliances on presentation of the building within the streetscape and the associated amenity impacts for neighbouring apartments, being the site's context. This is addressed in further detail below.

There is inadequate information submitted to understand the potential overshadowing impacts caused by the additional GFA, and particularly by the non-complying height.

In addition to the non-compliance with the height standard outlined in Section 87(2) of the Housing SEPP, the proposed development also fails to comply with the site specific provisions in Clause 6.36 in SLEP 2012 required to be met to obtain a gross floor area ('GFA') design excellence bonus of 8%.

The clause states:

“(2) Despite clause 6.21D(3), a building demonstrating design excellence on land to which this clause applies—

- (a) must not have a building height that exceeds the maximum height shown for the land on the Height of Buildings Map, and*
- (b) is only eligible for an amount of additional floor space of up to 8% of—*
 - (i) the amount permitted as a result of the floor space ratio shown for the land on the Floor Space Ratio Map, and*
 - (ii) any community infrastructure floor space for which the building is eligible under Division 2.”*

The application properly applies the potential 8% bonus to the base permitted floor space ratio in SLEP 2012, being the sum of the floor space permitted by Clause 4.3 and the community infrastructure floor space in Clause 6.14. This base equates to a ratio of 2:1 and would be increased to 2.16:1 if the 8% design excellence bonus is applied.

However, as outlined in Clause 6.36(2)(a) in SLEP, the development must comply with the height of buildings development standard in Clause 4.3 in SLEP to access the design excellence bonus of 8%. Given the proposal seeks to utilise the 25% floor space bonus in Subsection 87(2)(c) of the Housing SEPP, which also provides an additional 3.8m building height, the overall height of the proposed development has increased and therefore does not comply with the height of buildings development standard in Clause 4.3 in SLEP. As a result, the 8% design excellence bonus in Clause 6.36 in SLEP 2012 is forfeited and cannot be obtained. **The City objects to the proposed development on this basis.**

Therefore, only the 25% (up to) floor space ratio bonus in Subsection 87(2)(c) of the Housing SEPP should be considered and the total FSR would need to be reduced by at 0.16:1 to comply with the Housing SEPP and SLEP 2012.

To provide context, the site-specific provision in Clause 6.36 in SLEP 2012 was drafted prior to the introduction of the Housing SEPP bonus referred to above or the specific intention to develop the site for seniors living. The City raises no objection to the application seeking to obtain the Housing SEPP bonus, however, in this instance the floor space bonuses are not able to be accumulated and the SLEP 2012 bonus must be forgone given the inconsistency with Clause 6.36(2)(a). The applicant rightly acknowledges that this provision is not subject to the operation of Clause 4.6 in SLEP 2012 and therefore cannot be varied.

In addition, it should be noted that Clause 6.36 in SLEP 2012 is supplemented by Section 5.7.6.1 in SDCP 2012 which also required dwellings to achieve ecological sustainable development outcomes. Should the design excellence bonus be granted, then appropriate ESD outcomes are also to be met.

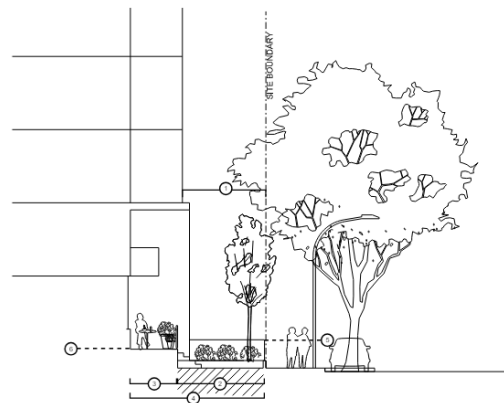
The proposed development must strictly comply with the relevant permitted FSR, having taken into consideration the eligible bonuses and the industry specific gross floor area definition.

Urban Design

Primary building setbacks

The proposed building would not comply with the ground floor level and first level setbacks as ordinarily required by Section 5.7.2.1 of SDCP 2012. The diagram in Figure 3 below, taken from Part 5 of SDCP 2012 should be utilised as a guide. These setbacks should be applied consistently as done so throughout the North Rosebery Precinct.

Figure 5.189
Typical ground
floor condition
for residential
development



1. Primary building setback, clear full height – landscape setback minimum 2m
2. Deep soil landscape planting area – refer to landscape setback in *Building setback and alignment map*
3. Ground floor private open space deck - min. 1.2m
4. Setback from the site boundary to the glass line
5. Site boundary fence – max. 1.4m high
6. Ground floor private open space deck max. 1m above street level

Figure 3. Typical ground floor condition for residential development (Section 5 of the DCP)

The provision of a ground floor level setback would also assist to facilitate the provision of direct entries to the ground floor level apartments. Providing individual ground level entries would improve the amenity of these apartments and improve the connection to the street.

Rosebery Avenue pedestrian ramps

Two 1:14 grade ramps are proposed parallel to the Rosebery Avenue frontage to address the level change between the footpath and the development. A 1:20 grade ramp would be more comfortable given the proposed development is for the purpose of seniors living.

The ramps will take up a significant area within the landscaped setbacks. Angled ramps are preferred so that some planting can be provided either side of the ramps. Privacy to the directly adjoining apartments and their balconies should also be considered.

Substation Kiosks

The proposed substation kiosk enclosures within the Dalmeny Avenue and Rosebery Avenue landscaped setbacks detract from the streetscape and the landscaped setting of the development. The height of the kiosk plinths to meet the relevant flood planning levels also further exacerbates the prominence of the substation kiosks. The City provided pre-SSDA advice outlining that the proposed kiosks were not supported and were required to be redesigned to be well integrated into the design of the building. Chamber kiosks would be the most appropriate solution.

Flooding

The proposed development is required to comply with Clause 5.21 in SLEP 2012. The City's Interim Floodplain Management Policy requires habitable rooms to be above the 1% AEP flood level + 0.5m freeboard and basement entries above the 1% AEP flood level + 0.5m freeboard or the Probably Maximum Flood level (whichever is higher),

The proposed basement, however, does not achieve the 1% AEP flood level + 0.5m freeboard, noting that this is higher than the PMF in this location, and instead proposes to rely on a flood gate to protect the basement from water ingress. Flood gates are prone to failure are not supported by the City. **The City objects to the development on this basis.**

The proposed carpark air supply also only achieves the PMF level and would need to be amended to achieve the 1% AEP flood level + 0.5m freeboard.

The design of the basement entry will need to be amended to provide a crest for the driveway, with suitable transitions, to achieve the 1% AEP flood level + 0.5m freeboard level. In redesigning the driveway careful consideration will need to be taken to the vertical clearances to ensure that access for waste and service vehicles is also maintained.

Seniors Housing Design Guide

Section 18 of the design guide outline how the guide aligns with the Apartment Design Guide and that the design of high density seniors housing, such as the proposed development, will further benefit from referencing the general good design guidance set out in the ADG and can be used in conjunction with seniors housing guide where applicable.

Dwelling Mix

The City recently exhibited amendments to SDCP 2012 to amend the desired dwelling mix for residential development. The current and proposed dwelling mix is as follows:

	SDCP 2012	DCP Amendment
Studio	5-10%	Min 30%
One-bedroom	10-30%	
Two-bedroom	40-75%	Max 50%
Three-bedroom	10-100%	Min 30%

Table 2: Dwelling mix controls

The proposed dwelling mix for the independent living units is as follows.

- One bedroom – 7.1% (12 units)
- Two-bedroom – 59.4% (101 units)
- Three-bedroom – 33.5% (57 units)

Based on the existing and draft controls, it is recommended that the proportion of one-bedroom units be increased. This should be accommodated by reducing the proportion of two-bedroom units.

Natural Cross Ventilation

The proposed development provides poor natural cross ventilation. The cross ventilation diagrams (DA-700 & DA-701) incorrectly identify numerous units as being naturally cross ventilated. An example is provided in Figure 4 below.



Figure 4. Annotated natural cross ventilation diagram

The Natural Ventilation Assessment report (Appendix OO) attempts to establish a criteria for natural cross ventilation equivalence, being 50% of the air movement in comparison to the corner apartments are naturally cross ventilated. This proposed approach is not supported by the City and results in poor amenity for the independent living units.

The proposed buildings fronting Rosebery Avenue and Dalmeny Avenue would have poor natural ventilation having been designed with double loaded corridors.

Should the Department wish to consider this approach, it should be done so as a merit assessment rather than attributing these units to the percentage of apartments that are naturally cross ventilated. Additionally, the 50% comparative threshold is set very low. It

is also noted approach seems to have been applied inconsistently. The design of the buildings should be reconsidered to provide a reasonable portion of actual naturally cross ventilated apartments.

Solar Access

The application does not provide adequate information to assess the potential impacts to the solar access of neighbouring apartments. Concern is raised that the proposed development, including the extent of additional floor space attempted to be achieved under relevant bonuses, would result in unreasonable impacts to the existing amenity of neighbouring apartments.

The Design Principles for Seniors Housing in Schedule 8 to the Housing SEPP states:

*“(d) maintain reasonable neighbourhood amenity and appropriate residential character by—
 (i) providing building setbacks to reduce bulk and overshadowing,*

The Seniors Housing Guide identifies Objective 3B of ADG as ‘Good Guidance’ and therefor significant weight should be given to the design guidance in Objective 3B-2.

The applicant was provided with the City’s [policy](#) and documentation at pre-lodgement stage and it is noted this has not been provided.

Additional information is to be provided so that a proper assessment can be undertaken. Detailed information should be provided to compare the existing scenario, a LEP/DCP compliant scheme and the proposed development.

Contamination

The Soil Contamination Assessment (Appendix DD) identifies soil contamination and states that the site can be made suitable for the proposed use subject to the removal of impacted soils. The proposed development is not considered to comply with Section 4.6 of SEPP (Reliance and Hazards) 2021 based on the information submitted.

Where the DESI concludes that the site is suitable for the proposed use it is to be peer reviewed by a NSW EPA Accredited Site Auditor. A Section B Site Audit Statement is to be submitted to the consent authority certifying that the site can be made suitable for the proposed use subject to a specified plan as required such as a CEMP for soil removal.

Where the Auditor identifies that a RAP is required for the site, a section B Site Audit Statement or letter of Interim advice must be obtained from a NSW EPA Accredited Site Auditor and forwarded to the consent authority certifying that the submitted RAP is practical and the site will be suitable after being remediated in accordance with the requirements of the submitted RAP.

Traffic and Access

Porte Cochere

The design of the Porte Cochere along Dalmeny Avenue should be amended to reduce the impact to on street parking. Each cross over should be no more than 6m wide.

The design of the Porte Cochere should allow a car to independently pass a parked ambulance or minibus. Swept paths should be provided to demonstrate this.

On Site Car Parking Rates

Section 107 and 108 of the Hosing SEPP provide non-discretionary development standards for parking for residential care facilities and independent living units, respectively.

The proposed development provides 191 on site parking spaces. Whilst this does not meet the minimum parking rate, the City supports the provision of less parking and any further efforts to reduce on site parking would also be supported. The applicant should not be required to meet the non-discretionary development standards.

The parking rates as outlined below:

Independent Living Units

	Number of Units (rooms)	Rate	Minimum Parking Spaces
One-bedroom	12 (12 rooms)	0.5 / bed	6
Two-bedroom	101 (202 rooms)		101
Three-bedroom	57 (171 rooms)		85.5
Total	170 (385 rooms)		192.5

Residential Care Facility

1 space per 15 beds

0.5 space per employee

Parking spaces allocated to the residential aged care facility (RACF) visitors (2 spaces) and staff (4 spaces) should be identified as part of the application and appropriate conditions provided to ensure these are allocated to the RACF upon completion for use by visitors and staff.

Motorcycle Parking

Parking for motorcycles should also be considered. As a guide, the DCP requires one space for every 12 car parking spaces.

Electric Vehicle Charging

Electric vehicle charging infrastructure should be provided to meet the future demand created from the uptake of electric vehicles, consistent with the DCP, NCC and Seniors Living Design Guidelines.

Tandem Parking Spaces

Tandem parking spaces must only be used for resident parking and must be allocated to the same unit.

Car Stackers

Nine car stackers accommodating 24 spaces are proposed. Generally, car stackers should not accommodate more than two parking spaces. Two-thirds of the car stackers are designed for three vehicles. The Transport Impact Assessment (Appendix AA)

provides no information or assessment for the car stackers. This should be amended to include information including the design specifications for the proposed stackers.

Spaces within a car stacker must only be used for resident parking and must be allocated to the same unit.

A reduction in the total number of parking spaces would be supported to address the above.

Carshare Parking

Car share parking spaces are to be retained as common property by the Owners Corporation and not to be sold, leased or allocated to an individual owner or occupier at any time. Car share spaces should be clearly marked on the plans.

Loading

The proposed loading dock within the basement is supported. Detailed should be provided to confirm the maximum vehicle size with swept paths provided. A loading dock management plan should be developed to reflect this. The TIA indicated the loading dock has a 4.5m height clearance whereas the architectural plans only indicate 4.0m.

The use of the loading bay for ambulance access may be acceptable, however, an effective management plan should be developed to ensure that ambulance access is unimpeded.

End of Trip Facilities and Bicycle Parking

End of trip facilities and bicycle parking, including a minimum of one shower and five lockers for staff are to be provided. Visitor bicycle parking, adjacent to the main building entry should also be provided.

Landscaping and Trees

The proposed site access arrangement results in additional vehicle crossovers on Dalmeny Avenue for the proposed Porte Cochere and vehicle access along the northern through-site-link which are in addition to the proposed basement entry. This requires the removal of (Tree 33 and 34) which is not supported. Consideration should be given to redesigning the vehicle access to allow the retention of these high-value trees.

Provision 3.11.11(4) of SDCP 2012 requires parking and driveway crossovers to be designed to minimise the impact on existing street trees and maximise opportunities for new street tree plantings. Minimising the width of the driveway may improve the prospects of retaining additional street trees (Tree 36, 37 & 38).

The proposed driveway splays within the verge are to be reduced. A 500mm driveway wing is required.

Tree 30 located on council land within the existing land dedication to the south of the site should be retained. Tree sensitive methods should be adopted to retain this tree.

The stormwater design includes rain gardens under the large trees within the northern through site link, however, this is not reflected on the submitted landscape plans. There is also a stormwater pipe proposed immediately below the large trees. Further coordination is required between architectural plans, landscape plans and civil drawings.

All replacement street trees must be planted in accordance with the City's Street Tree Master Plan. The Master Plan provides a coordinated and strategic approach to future planting and ensures our street trees provide a green and resilient future.

Building and basement setbacks

The proposed building and basement are located 3m from the Dalmeny Avenue boundary and may have a significant impact on the existing high value street trees located along this frontage. Excavation for the proposed basement should minimise potential intrusion into the Tree Protection Zone ('TPZ') of these trees.

The southern landscaped setback is partly set over basement. The nominated 3m wide deep soil area along the southern boundary falls entirely within the 8m road dedication. The design of the dedicated land has not been entirely developed at this stage and is subject to City requirements. It is noted that various paths are incorporated in the architectural plans that have not been reflected in the deep soil diagram (DA-640). A cautious approach should be taken to attributing that land as deep soil. This is also the case for building entry ramps along the Rosebery Avenue frontage. Ideally, the 2m southern setback to the land dedication boundary should be provided as deep soil.

The northern landscaped setback is set over basement. Confirmation is required that adequate soil depth and volume are provided to support the proposed trees located above the basement structure. Ideally, the proposed basement should be set back entirely below the proposed building.

The GANSW Design Integrity Panel also raised potential impact to trees surrounding the site as an ongoing issue. The design and location of the proposed basement is to be reconsidered to ensure that impacts to surrounding trees are minimised and that adequate deep soil landscaping can be provided within the site.

Planting on Structure

The design of the proposed landscaping on structure is generally supported, however, further information should be provided prior to the issue of a construction certificate requiring detailed landscape designs and details to be endorsed by the City and a maintenance plan, including roof access, to be prepared.

50% of the rooftop areas should comprise green roofs.

Canopy Targets

A minimum tree canopy of 15% is to be provided on site (excluding land proposed to be dedicated). Canopy tree plantings should include 30% species with a mature height of 6-8m, 30% with a mature height of 10-15 meters, and 40% with mature height of 20-30 meters.

The submitted landscape plans and report specify predominantly smaller species trees and should be amended as outlined above. This should include appropriate species to suit changing environmental conditions, ensuring new landscaping is designed to be adaptable, focusing on the largest possible and deciduous trees for improved winter solar access. The City's Tree Species List should be referred to when selecting any tree species to be incorporated into the amended landscape plans.

A minimum tree canopy coverage of 70% is to be achieved for the northern through-site-link and southern laneway (including the existing land dedication along the northern edge of 42-60 Roseberry Avenue). Works within the garden bed along the southern side of the vehicle lane would straddle council land and may need to be considered as integration works as part of the Planning Agreement.

Deep Soil Requirements

Non-discretionary development standard in Section 108(2)(f) of the Housing SEPP for independent living units requires the development to provide 15% deep soil. Additionally, the site area is greater than 1,500sqm and therefore the ADG would require 15% deep soil to be achieved. The Seniors Housing Design Guide categorises this as 'Good Guidance' and therefore it should be achieved.

The proposed deep soil equates to 12% and must be increased to 15% to support the landscaped setting of the building and maximise the opportunity for tree canopy cover.

As outlined above, there are a number of paths intersecting nominated deep soil areas. The Deep Soil Diagram (DA-640) is to be amended to accurately identify complaint deep soil areas.

Waste Management

The proposed waste chutes are located adjacent to habitable rooms within the adjoining independent living units. The following criteria are to be met to ensure that the operation of the waste chutes do not cause audible impacts to the amenity of the units:

- (a) an RW + Ctr of not less than 55 if the adjacent rooms are habitable rooms (includes a kitchen, laundry and hallway) and achieve a DnT,w + Ctr of not less than 50 in verification prior to occupation, and*
- (b) an LnT,W + Cl of not more than 55 if the adjacent rooms are habitable rooms (includes a kitchen, laundry and hallway) and achieve a L'nT,w + Cl of not more than 55 in verification of the construction methodology prior to occupation.*

The proposed waste management plan includes compaction. Residential bin compaction is not encouraged to reduce breakage and preserve the life of Council owned bins. Twice weekly collection (not recycling) may be considered due to the size of the site.

It is not clear whether the chute discharge rooms are appropriately sized to allow for a linear track system to be installed. A linear track system is recommended to assist future waste management.

Clause 7.20

The City agrees that the recently prepared site specific DCP for the North Rosebery Precinct meets the intent of subclause 7.20(2)(b) in SLEP 2012 and therefore preparation of a site specific DCP or approval of a Stage 1 Concept DA can be considered unreasonable and unnecessary. However, this is on the basis that the proposed development is consistent with Section 5.7 of SDCP 2012.

Contributions

Section 7.11 of the Act

The proposed development is subject to a development contribution calculated in accordance with the City's Development Contributions Plan 2015. An appropriate conditions is to be imposed.

Section 7.32 of the Act

The proposed development is subject to an *affordable housing contributions level* calculated in accordance with Section 7.13(2A) in SLEP 2012. The site is located on land in *Green Square*. Appropriate conditions are to be imposed.

Summary

The proposed development is objected to in part, for the following reasons:

- The application cannot be finally determined until such time that a satisfactory VPA has been exhibited and entered into with the City.
- The application is not eligible to take up the design excellence bonus in Clause 6.36 in SLEP given the bonus in Subsection 82(2)(c) has been taken up and therefore the proposed development does not comply with the height of buildings development standard in Clause 4.3 in SLEP 2012 as required by Clause 6.36 in SLEP 2012 to permit the design excellence bonus.
- The use of flood gates is not supported.

In addition, the above comments have been provided for consideration and require design amendments and additional information. Concern is raised regarding the proposed bulk and scale of the buildings given the excessive GFA and its associated impacts. Amendments are required to improve the amenity of the building for the occupants and improve the provision of landscaping and deep soil within the site to support the provision of tree canopy to meet the City's targets.

Should you wish to speak with a Council officer about the above, please contact Michael Stephens, Senior Planner, on 9265 9040 or at mjstephens@cityofsydney.nsw.gov.au

Yours sincerely,



CHRISTOPHER CORRADI
Area Planning Manager