

Item 4.**Development Application: 15-17 William Street, Alexandria - D/2020/1059****File No.:** D/2020/1059**Summary**

Date of Submission:	The application was lodged on 19 October 2020.
Applicant:	David Findlay
Architect:	Derek Raithby Architecture
Owner:	Balglen Pty Ltd.
Planning Consultant:	ABC Planning
DAPRS:	2 February 2021
Cost of Works:	\$8,814,325
Zoning:	The proposed multi-dwelling houses are permissible with consent within the B4 Mixed Use Zone.
Proposal Summary:	<p>The proposal involves the demolition of an existing warehouse. It is intended to excavate and remediate the site and to construct 14 x terrace style, 3-4 storey multi dwelling houses. Torrens Title (stratum) subdivision of the site is proposed.</p> <p>The applicant has made a public benefit offer in order to provide community infrastructure contribution as required under Clause 6.14 of the Sydney Local Environmental Plan 2012 (SLEP2012). Consequently, the application is required to be determined by the Local Planning Panel. This is in accordance with the Local Planning Panels Direction - Development Applications, dated 30 June 2020.</p> <p>The applicant has made a public benefit offer to provide a monetary contribution towards Green Square community infrastructure.</p>

In accordance with Clause 6.14 of SLEP2012, the contribution (if accepted) allows for an additional FSR provision of 0.5:1 and a total FSR of 1.5:1 (GFA: 1,651.5sqm).

The proposal has an FSR of 1.55:1 and exceeds the relevant SLEP2012 development standards. A request to vary the FSR development standard has been made pursuant to Clause 4.6 of the Sydney LEP 2012. The written request to vary the standard significantly understates the GFA that is proposed and does not demonstrate that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case. The written request fails to demonstrate that there are sufficient environmental planning grounds to justify contravening the development standard. The proposal falls within the 15m height control established at Clause 4.3 of SLEP2012.

The application was notified for 21 days, in accordance with Council's Community Participation Plan. Two submissions were received objecting to the proposal. Issues raised include excessive building scale, visual privacy and solar access.

The application fails to satisfy FSR standards and fails to achieve design excellence by providing poor design and amenity outcomes. The proposal fails to provide sufficient separation distance between the rear of terraces and consequently fails to provide adequate outlook or privacy. The high density of the development also results in poorly planned landscaped areas and insufficient deep soil areas. Consequently, the application is recommended for refusal.

Summary Recommendation: This proposal is recommended for refusal.

Development Controls:

- (i) Environmental Planning and Assessment Act 1979 and Regulation 2000;
- (ii) State Environmental Planning Policy No 55—Remediation of Land;
- (iii) State Environmental Planning Policy (Infrastructure) 2007;
- (iv) State Environmental Planning Policy (BASIX) 2004;
- (v) Sydney Local Environmental Plan 2012 (Gazetted 14 December 2012, as amended);
- (vi) Sydney Development Control Plan 2012 (in force on 14 December 2012, as amended); and
- (vii) City of Sydney Development Contributions Plan 2015.

Attachments:

- A. Selected Drawings
- B. Clause 4.6 Variation Request - Floor Space Ratio

Recommendation

It is resolved that consent be refused for Development Application No. D/2020/1059 for the following reasons:

- (A) The applicant has failed to provide documents to demonstrate that the proposed change of land use will not increase the risk to health given a more sensitive land use is proposed. As such, the proposal fails to satisfy the provisions of the State Environmental Planning Policy (SEPP) No 55.
- (B) The proposed development provides poor amenity for its intended future occupants and to the occupants of neighbouring buildings, and fails to satisfy key Aims at Clauses 1.2(h) and 1.2(j) of the Sydney Local Environmental Plan 2012, that are to protect the amenity and quality of life of the local community, provide a high quality urban form and design excellence and to reflect the desired future character of the locality.
- (C) The applicant has failed to provide a written statement that is satisfactory in addressing the provisions of Clause 4.6 of the Sydney Local Environmental Plan 2012 with regard for the non-compliance with the floor space ratio development standard prescribed under Clause 4.4 of the Sydney Local Environmental Plan 2012.
- (D) The application fails to satisfy the relevant Green Square Community Infrastructure provisions under Clause 6.14 of the Sydney Local Environmental Plan 2012. In particular the proposal fails to satisfy key objective 6.14(1)(b) as the proposal does not reflect the desired character of the locality and fails to minimise adverse impacts on the amenity of the locality. In failing to satisfy the objective of the clause, the land is not eligible for an amount of additional floor space in accordance with Clause 6.14(4) of the Sydney Local Environmental Plan 2012.
- (E) Having considered the matters in 6.21(4), the building fails to meet the minimum standards required to demonstrate design excellence. In particular, the proposal fails to provide high residential amenity for its intended future occupants and to the occupants of neighbouring buildings and fails to provide suitable building bulk, massing and modulation and fails to provide excellence and integration of landscape design.
- (F) The proposed development exceeds the development standard for the maximum number of car parking spaces set out at Clause 7.5 of Sydney Local Environmental Plan 2012.
- (G) The applicant has failed to provide a requested Stormwater Concept Design, and as such, fails to satisfy the provisions of part 3.7.2 of Sydney Development Control Plan 2012 in relation to demonstrating how the development connects to the downstream drainage system.
- (H) The proposed development fails to satisfy a key design principle of the Beaconsfield locality, which is to provide a high quality built form in the southern area. The application fails to satisfy the provisions of part 2.5.2 of Sydney Development Control Plan 2012.

- (I) The proposal fails to provide adequate deep soil areas and adequate depth and volume to landscape planters and fails to satisfy the Sydney Landscape Code. The application fails to satisfy the provisions or parts 3.5.2 and 4.1.3.4 of Sydney Development Control Plan 2012 in relation to Urban Vegetation and in relation to Deep Soil Planting.
- (J) The proposal is not in keeping with the desired future character of the area, in accordance with section 2.5.2 of Sydney Development Control Plan 2012 and is not considered to be in the public interest.

Background

The Site and Surrounding Development

1. The site has a legal description of Lot 2 DP 559934, known as 15-17 William Street, Alexandria. The site is rectangular in shape with area of approximately 1,101sqm. The site has a primary street frontage of 35.7m to William Street and a secondary street frontage of 36.2m to William Lane. The site falls from William Street towards William Lane with a levels difference of approximately 2.8m.
2. The site contains a single storey warehouse at William Street. Due to the difference in the topography, the warehouse is a 2 storey building at William Lane.
3. The site is located within a precinct with a transitional urban character. The site is located within a row of properties on the western side of William Street bordered by Reserve Street to the north and Collins Street to the south. The subject site is the final 'remnant' commercial /industrial building on the western side of the street block to be converted to residential uses.
4. There are commercial warehouses located to the north-east of the site on the opposite side of William Street and to the south-east of the site at Collins Street.
5. At the northern boundary are located 6 x multi-dwelling townhouses that are on Strata Title (11-13 William Street - Figure 4). Further to the north, at the corner of Reserve Street, is located a mixed use development containing residential apartments and multi-dwelling houses (1-9A William Street - Figures 5);
6. At the southern boundary at 19A-19F William Street are located 6 x multi-dwelling townhouses that are on Torrens Title. Further to the south is located a residential development containing apartments (21-27 William Street - Figures 6).
7. To the east of the site, on the opposite side of William Street, is located Beaconsfield Park containing open space, tennis courts and amenities. To the west of the site, on the opposite side of William Lane are located commercial premises that have frontages to O'Riordan Street.
8. The site is not a heritage item and is not located within a heritage conservation area. The site is located within the Green Square and Beaconsfield localities and is not identified as being subject to flooding.
9. A site visit was carried out on 9 February 2021. Photos of the site and surrounds are provided below.



Figure 1: Aerial view of site and surrounds



Figure 2: Site viewed from William Street, generally looking north-east



Figure 3: Site viewed from William Lane, generally looking south-east



Figure 4: 11-13 William Street to the northern boundary, viewed from William Street and William Lane



Figure 5: 1-9A William Street further to the north at the corner of Reserve Street, viewed from William Street and William Lane



Figure 6: 19A-19E William Street to the southern boundary, viewed from William Street and William Lane



Figure 7: 21 William Street further to the south at Collins Street, viewed from William Street and William Lane



Figure 8: 29-41 William Street further to the south at Collins Street, viewed from William Street and William Lane

History Relevant to the Development Application

Development Applications - Site

10. Historic consents relating to the operation of the site as a factory and for business identification signage were granted under applications D/1999/304 and D/2000/1162. There are no other applications that are relevant to the current proposal.

Neighbouring sites - North

11. 1-9 William Street: D/2014/1028 (as amended) was approved for the demolition of existing buildings, remediation of site and the construction of a residential development.
12. 11-13 William Street: D/2012/1852 (as amended) was approved on 22 August 2013 by the Land and Environment Court for alterations and additions to an existing industrial warehouse building to create 6 x 2 storey townhouses with basement carparking.

Neighbouring sites - South

13. 19A-19F William Street: D/2013/62 (as amended) was approved on 13 July 2015 for the demolition of an existing warehouse and the construction of 6 x 3 storey townhouses and 2 x apartments with lower ground floor car parking.
14. 21-27 William Street: D/2015/145 (as amended) was approved by the Land and Environment Court on 17 March 2016 for the construction of a 4 storey residential flat building consisting of 36 apartments, one level of basement parking for 28 vehicles and associated site and landscaping works.

Compliance Action

15. The site is not subject to any compliance actions that are relevant to the subject application.

Amendments

16. A request for additional information and amendments was sent to the applicant in March 2021, following an assessment of the proposed development by Council Officers.
17. The applicant was requested to amend drawings and provide supporting documents to address the following issues:
 - (a) non-compliance with the FSR standard;
 - (b) inadequate building separation and poor residential amenity;
 - (c) inadequate deep soil and landscape provisions;
 - (d) unclear solar access impacts; and
 - (e) waste facilities, contamination and stormwater issues.
18. The applicant responded to the request in April, by submitting amended drawings and solar diagrams. Council officers considered that while some improvements had been made the revised drawings failed to respond adequately to the issues raised.
19. In particular, the amended proposal continues to exceed the FSR standards and presents excessive building bulk, as evidenced by insufficient building separation, with resulting impacts upon the residential amenity of the subject site and neighbouring sites. Landscaped areas are inadequate to provide the intended privacy mitigation and the proposal exceeds the maximum car parking provisions.
20. A number of discussions have been held with the applicant in regard to the issues raised. Council officers remain concerned that FSR and separation issues will remain unresolved. Subsequently the application is being reported to LPP and recommended for refusal.
21. The amended drawings form the subject of the assessment.

Proposed Development

22. The amended application seeks consent for the following:
 - (a) demolition of an existing warehouse building;
 - (b) excavation of a basement level and site remediation;
 - (c) construction of 14 x 3-4 storey multi-dwelling houses (terraced townhouses), including 4 x 2 bedroom dwellings and 10 x 3 bedroom dwellings;
 - (d) vehicle access from William Lane and pedestrian entry to all dwellings from William Street and William Lane; and

- (e) site landscaping.
23. The multi-dwelling housing development is proposed to contain:
- (a) a partial basement beneath dwellings T8-T14 that have a frontage to William Street and a ground level parking area beneath dwellings T1-T7 facing William Lane containing a communal bin storage area;
 - (b) ground level: open plan living areas opening onto terrace private open spaces within a central courtyard;
 - (c) Level 1: 2 bedrooms per dwelling;
 - (d) Level 2: third bedrooms for dwellings T3-T5 and T8-T14 and roof terraces for dwellings T1-T2, T6-T7; and
 - (e) third level: roof terraces for dwellings T8-T14.
24. Building facades are proposed to include the following materials (see discussion below in relation to the use of 'or similar'):
- (a) face brick at the lower levels 1 and 2;
 - (b) Colourbond 'Monument' roof cladding for level 3 facades and painted balcony balustrades; and
 - (c) timber pergolas at the roof level and aluminium windows.
25. The proposal includes a public benefit offer, in the form of a monetary contribution, to provide for Community Infrastructure in the Green Square Locality. The offer has not been accepted by Council officers given the proposal fails to satisfy a key objective 6.14(1)(b) of SLEP2012, which is to provide a development that reflects the desired character of the locality and that minimises adverse impacts on the amenity of the locality.
26. Having considered the matters in 6.14(3), the consent authority cannot be satisfied the development is consistent with objective 6.14(1)(b) listed above. In failing to satisfy the objective of the clause, the monetary offer is not accepted and the land is not eligible for an amount of additional floor space in accordance with Clause 6.14(4) of SLEP2012. A Voluntary Planning Agreement (VPA) has not been drafted.
27. A full set of architectural drawings is provided at Attachment A. An extract from the architectural package is provided below.

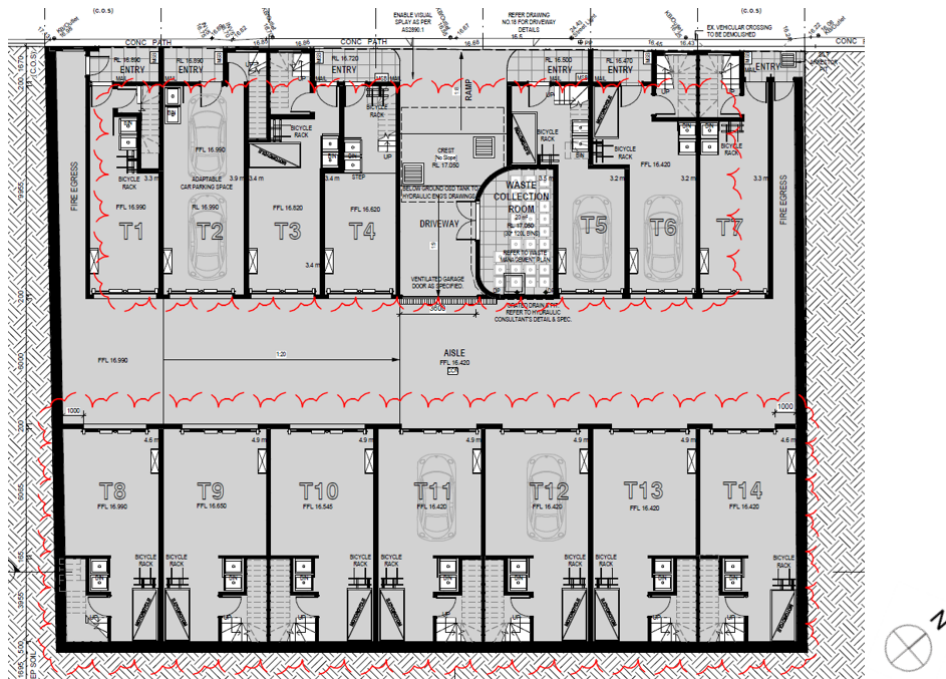
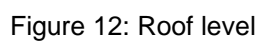
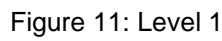


Figure 9: Basement plan



Figure 10: Ground level



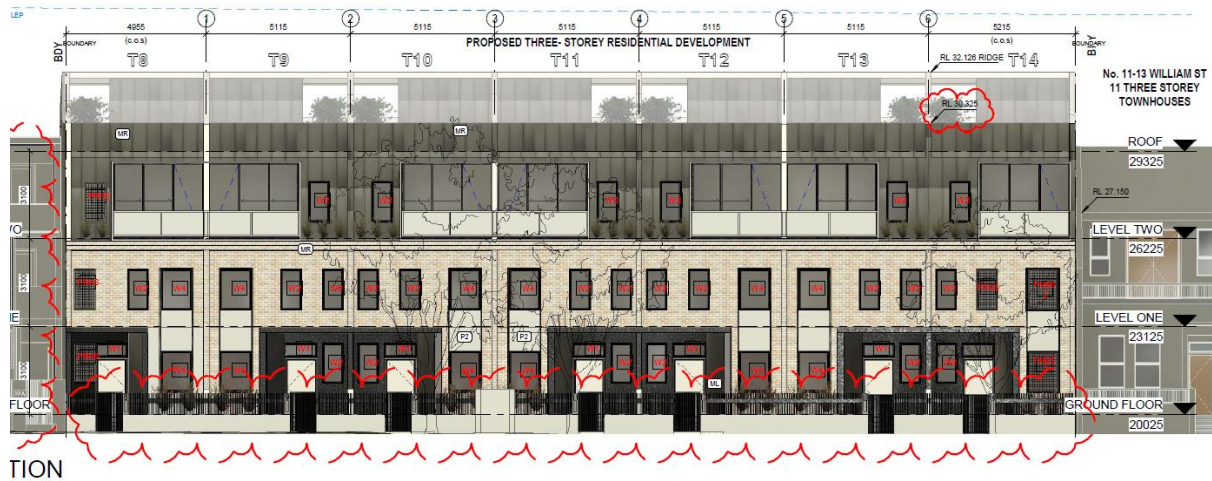


Figure 13: East elevation (William Street)



Figure 14: West elevation (William Lane)



Figure 15: Internal elevation (looking west towards William Lane)



Figure 16: Internal elevation (looking east towards William Street)

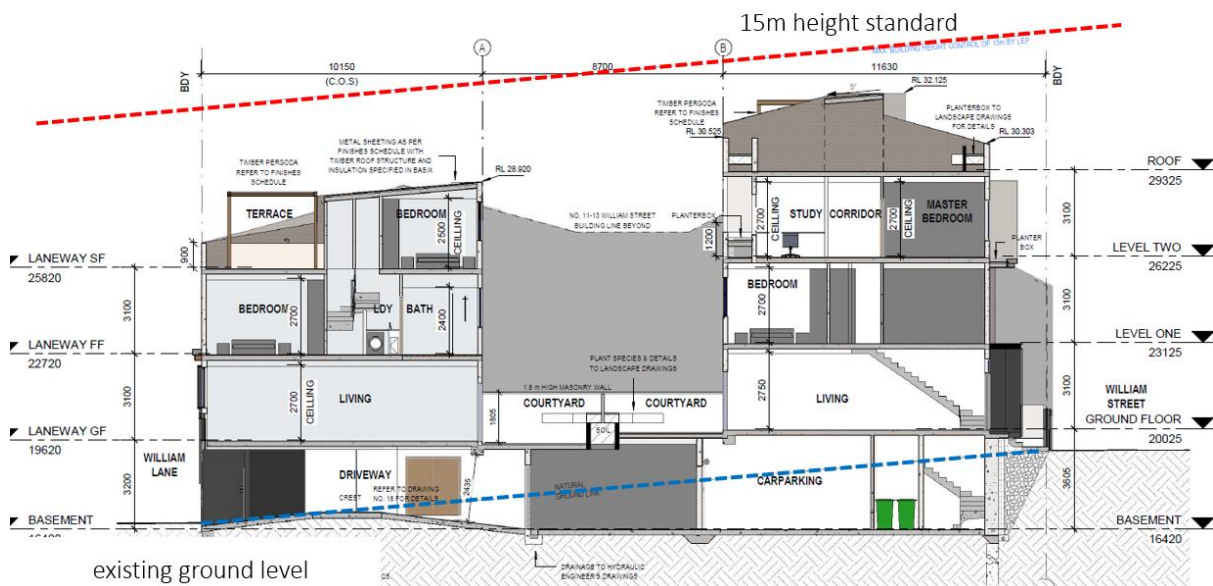


Figure 17: Section Plan showing partial basement under dwellings T8-T14 (William Street) and above ground parking areas under dwellings T1-T7 (William Lane)



Figure 18: Architectural render - William Street frontage

Assessment

28. The proposed development has been assessed under Section 4.15 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

State Environmental Planning Policies

State Environmental Planning Policy No 55 - Remediation of Land

29. The aim of State Environmental Planning Policy (SEPP) No 55 is to ensure that a change of land use will not increase the risk to health, particularly in circumstances where a more sensitive land use is proposed.
30. The proposal has been reviewed by Council's Health and Building specialists with regard for the provisions of the State Environmental Planning Policy No 55—Remediation of Land. The documents lodged with the application have been found to be unsatisfactory.
31. In particular:
- (a) the Detailed Site Investigation (DESI) states that no assessment has been carried out for the presence of phenols or asbestos despite them being identified as contaminants of potential concern; and

- (b) whilst the applicant has engaged a NSW Accredited Site Auditor to peer review and audit the site investigation, there is no documentation from the Site Auditor to peer review the DESI and endorse its conclusions that the site is suitable for the proposed use.
32. The applicant was requested to provide an addendum to incorporate all further investigations that were recommended by the NSW EPA accredited Site Auditor. The applicant has failed to provide the requested documents at the time of assessment.

State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

33. The applicant provided supporting documents with the application that demonstrate the proposal is capable of satisfying the provisions of the BASIX SEPP.

State Environmental Planning Policy (Infrastructure) 2007

34. The provisions of SEPP (Infrastructure) 2007 have been considered in the assessment of the development application.

Division 5, Subdivision 2: Development likely to affect an electricity transmission or distribution network

Clause 45 Determination of development applications – other development

35. The application is subject to Clause 45 of the SEPP as the development involves the penetration of ground within 2m of an underground electricity power line.
36. As such, the application was referred to Ausgrid for a period of 21 days. A response was received and no objection was raised.

Local Environmental Plans

Sydney Local Environmental Plan 2012

37. An assessment of the proposed development against the relevant provisions of the Sydney Local Environmental Plan 2012 is provided in the following sections.

Part 1 Preliminary

Provision	Compliance	Comment
1.2 Aims of Plan	No	<p>The proposed development provides poor amenity for its intended future occupants and to the occupants of neighbouring buildings.</p> <p>The development fails to satisfy the Aims of SLEP 2012 at 1.2(h) and 1.2(j), in relation to the amenity and quality of life of the local community, in relation to achieving a high quality urban form and design excellence and the requirement to reflect the desired future character of the locality.</p>

Part 2 Permitted or prohibited development

Provision	Compliance	Comment
2.3 Zone objectives and Land Use Table	Yes	The site is located in the B4 Mixed Use zone. The proposed development is defined as multi-dwelling housing and is permissible with consent in the zone.

Part 4 Principal development standards

Provision	Compliance	Comment
4.3 Height of buildings	Yes	A maximum building height of 15m is permitted. The proposal has a maximum height of approximately 14m and complies with the maximum height of buildings development standard.
4.4 Floor space ratio	No	<p>Clause 4.4 of SLEP 2012 allows for a maximum floor space ratio (FSR) of 1:1.</p> <p>In accordance with Clause 6.14 of SLEP2012, an additional FSR provision of 0.5:1 can be provided in relation to the provision for Green Square community infrastructure, increasing the maximum FSR for the site to 1.5:1 (GFA: 1,651.5sqm).</p> <p>The proposal provides 1,702sqm of GFA, resulting in a floor space ratio of</p>

Provision	Compliance	Comment
		1.55:1, and exceeds the permissible standard by 50.5sqm or 3 per cent. A request to vary the floor space ratio development standard in accordance with Clause 4.6 has been submitted. See further details in the 'Discussion' section below.
4.6 Exceptions to development standards	No	The proposed development seeks to vary the development standard prescribed under Clause 4.4. A written statement addressing the provisions of Clause 4.6 of SLEP 2012 fails to recognise the extent of the variation to the FSR standard and does not meet the requirements of the clause. See further details in the 'Discussion' section below.

Part 6 Local provisions – height and floor space

Provision	Compliance	Comment
Division 2 Additional floor space outside Central Sydney		
6.14 Community infrastructure floor space at Green Square	No	The proposed development is eligible for an additional floor space ratio of 0.5:1. A public benefit offer for a monetary contribution in accordance with Clause 6.14 of SLEP2012 has been submitted but is not supported. See discussion below in the issues section.
Division 4 Design excellence		
6.21 Design excellence	No	The current scheme fails to deliver the highest standard of architectural, urban and landscape design and is contrary to the design excellence provisions. See further details in the 'Discussion' section below.

Part 7 Local provisions – general

Provision	Compliance	Comment
Division 1 Car parking ancillary to other development		
7.5 Residential flat buildings, dual occupancies and multi dwelling housing	No	<p>A maximum of 14 car parking spaces are permitted for 4 x 3 bedroom dwellings and 10 x 2 bedroom dwellings in the 'B' area.</p> <p>The amended proposal includes 15 car parking spaces and fails to comply with the relevant development standards.</p> <p>Clause 7.5(2) of SLEP2012 can be useful in increasing the maximum car parking provision, however does not apply in this instance. Given that no visitor parking spaces are shown on the architectural drawings, the maximum car parking provision cannot be increased above 14 spaces.</p>
Division 3 Affordable housing		
7.13 Contribution for purpose of affordable housing	Yes	<p>The site is located within the Green Square affordable housing contribution area.</p> <p>In the event the proposal was supported, it would be subject to a Section 7.13 contribution.</p>
Division 4 Miscellaneous		
7.14 Acid Sulfate Soils	Yes	<p>The site is within a class 5 Acid Sulfate zone, which is 150m from a class 3 zone around the Alexandria Canal to the west.</p> <p>The Detailed Site Investigation concludes that there is a very low risk of finding acid sulfate soils and basement excavation is not likely to encounter groundwater, which is approximately 6m below ground level.</p> <p>Council's Health and Building specialists are satisfied that no additional information is required to address acid sulfate soils.</p>

Provision	Compliance	Comment
7.19 Demolition must not result in long term adverse visual impact	Yes	The applicant has not requested that the construction process should be staged and has not indicated there would be substantial delays between demolition and construction works.

Development Control Plans

Sydney Development Control Plan 2012

38. An assessment of the proposed development against the relevant provisions within the Sydney Development Control Plan 2012 is provided in the following sections.

Section 2 – Locality Statements

39. The site is located within the Beaconsfield locality. The proposed development is contrary to a key design principle of the locality, in that it does not result in high quality built form in the southern area of the neighbourhood which has a transitional urban character.

Section 3 – General Provisions

Provision	Compliance	Comment
3.2. Defining the Public Domain	Yes	The proposal has been amended to elevate residential entries above the footpath level to provide for better visual privacy whilst retaining passive surveillance.
3.5 Urban Ecology	No	<p>The amended proposal provides insufficient planter volumes to provide for meaningful landscape screening and does not provide for canopy trees.</p> <p>The development does not have the ability to provide 15 per cent canopy coverage within 10 years and fails to satisfy the provisions of the Landscape Code.</p>
3.6 Ecologically Sustainable Development	Yes	Details have been provided to demonstrate the proposal is capable of satisfying BASIX requirements.

Provision	Compliance	Comment
3.8 Subdivision, Strata Subdivision and Consolidation	Yes	The proposed development involves Stratum subdivision of the site, providing a communal car parking level. The new allotments are regular in shape and would not have a detrimental impact on the setting of the site.
3.9 Heritage	Yes	The site is not a heritage item and is not located within a heritage conservation area.
3.10 Significant Architectural Building Types	Yes	<p>The site contains a warehouse that is likely to be older than 50 years. Aerial photographs from 1975 show the warehouse in place.</p> <p>Despite this, the existing warehouse does not display any features that are remarkable or rare. The warehouse is utilitarian in character and has a simple rectangular form that is not reinforced with any particular features such as vertical brick piers, arches, articulated bays or feature windows.</p>
3.11 Transport and Parking Schedule 7.8.5 Accessible car parking spaces	No	<p>A traffic impact assessment report submitted with the application states that a maximum of 14 car parking spaces are to be provided in accordance with the SLEP2012 maximum and that visitor parking is not provided.</p> <p>The report states that motorcycle parking is not required by SDCP 2012 other than a single space and that bike parking should be provided for all dwellings. Amended plans show 15 parking spaces and motorcycles and bicycle parking spaces provided within all garages.</p> <p>2 adaptable car parking spaces are provided within the ground level of adaptable dwelling T2, resulting in a non-compliance with the SLEP2012 maximum car parking provision (see discussion above - Clause 7.5).</p>

Provision	Compliance	Comment
		<p>There are no provisions in SLEP2012 or SDCP2012 that require the provision of visitor car parking spaces within multi-dwelling development. However, the SLEP2012 maximum may be increased where visitor parking is provided [see discussion above in Clause 7.5(2) of SLEP2012].</p> <p>Part 3.11.4(6) of SDCP2012 states that where a residential development proposes less than the maximum number of car parking spaces (under SLEP2012), that the reduction in the number of spaces should be shared proportionally between resident parking spaces and visitor parking spaces. However, in this instance, it is proposed to provide 15 spaces, which is greater than the maximum.</p>
3.12 Accessible Design	Yes	A disability access report submitted with the application states that the proposal can comply with the provision of one adaptable dwelling. Dwelling T2 can be adapted with an internal lift to comply with the standards.
3.13 Social and Environmental Responsibilities	Yes	The proposed development provides adequate passive surveillance and is generally designed in accordance with the CPTED principles.
3.14 Waste	No	The proposal does not provide a minimum 4sqm of dedicated space for residential bulky and problem waste storage within a lockable cage, designated screened area or room.

Section 4 – Development Types

4.1 Single Dwellings, Terraces and Dual Occupancies

Provision	Compliance	Comment
4.1.1 Building height	No	SDCP2012 recommends a maximum building height of 3 storeys. The proposal has a height of 4 storeys at the western edge of the development. See further details in the 'Discussion' section below.
4.1.2 Building setbacks	Yes	The proposed development relates to the existing front and side setbacks patterns along William Street.
4.1.3 Residential amenity As demonstrated below, the proposed development will have acceptable residential amenity and will not have unreasonable impacts on the residential amenity of neighbouring properties.		
4.1.3.1 Solar access	Yes	View from the sun diagrams demonstrate that proposed and neighbouring dwellings receive greater than 2 hours of solar access at the winter solstice.
4.1.3.2 Solar collectors	Yes	The proposal does not include the installation of photovoltaic solar panels. There are no existing PVC arrays located on the roof areas of neighbouring buildings.
4.1.3.3 Landscaping	No	Minimal soil volumes are provided within the central courtyard to provide for landscaped privacy mitigation plantings. See discussion below.
4.1.3.4 Deep soil planting	No	<p>The amended proposal provides a narrow strip of deep soil at the William Street frontage with an effective width of 1.7m (61sqm or 5.5 per cent of site area).</p> <p>The deep soil area does not allow for significant canopy trees and fails to comply with the 15 per cent control specified by SDCP2012.</p>

Provision	Compliance	Comment
4.1.3.5 Private open space	Yes	Dwellings are provided with private open space at the ground level and on roof terraces. Private open spaces receive in excess of 2 hours' solar access on 21 June.
4.1.3.6 Visual privacy	No	Insufficient building separation and directly opposing windows provides poor residential amenity in relation to visual and acoustic privacy. Mitigation measures include fixed and obscure windows that decrease natural ventilation and create a sense of enclosure within rooms.
4.1.8 Balconies, verandahs and decks	No	Roof terraces rely on landscaped planter boxes to mitigate direct overlooking of the living spaces of neighbouring development and bedroom windows of dwellings within the same development. See discussion below.

Section 5 – Specific Areas

Provision	Compliance	Comment
5.2 Green Square	No	The amended proposal provides residential accommodation with insufficient building separation, deep soil provision and poorly integrated landscape design. This results in poor residential amenity for adjoining and future residents that fails to complement the existing and desired future character of the neighbourhood.
5.2.3 Community infrastructure	No	<p>A public benefit offer has been submitted by the applicant to enable a monetary contribution towards community infrastructure within the Green Square locality.</p> <p>The offer has not been accepted due to poor design outcomes and the exceedance of floor space bonus provisions within Green Square.</p>

Provision	Compliance	Comment
		The proposal fails to satisfy provision 6.14 of SLEP 2012 and Provision 5.2.3(1) of SDCP 2012, which specifies that consent may be granted for development up to the maximum gross floor area achievable under Clause 6.14 of Sydney LEP 2012, but only if the development contributes to the desired character of the locality in which it is located and has little or no impacts on the amenity of that locality. See discussion below in the Issues section.

Discussion

Floor Space Ratio - Calculation

40. The maximum floor space ratio (FSR) is provided by:
 - (a) Clause 4.4 of SLEP 2012 that allows for a maximum floor space ratio (FSR) of 1:1; and
 - (b) Clause 6.14 of SLEP2012 allows for an additional provision of 0.5:1, subject to the delivery of community infrastructure within Green Square community. Acceptance of such an offer increases the maximum FSR for the site to 1.5:1 (GFA: 1,651.5sqm).
41. The applicant has provided a gross floor area (GFA) diagram showing the proposal with a GFA of 1,629sqm, resulting in a FSR of 1.48:1.
42. The applicant's GFA diagram excludes all areas below the ground levels of the 14 x dwellings. However, these exclusions are reliant upon the area below dwellings T1-T7 meeting the SLEP2012 definition of a 'basement', which is:
 - (a) the space of a building where the floor level of that space is predominantly below ground level (existing) and where the floor level of the storey immediately above is less than 1 metre above ground level (existing).
43. The area beneath dwellings T1-T7 is above the ground level of William Lane and does not constitute the definition of a basement. The area below dwellings T8-T14 is below the ground level of William Street and satisfies the definition.
44. The areas excluded by the applicant include approximately 73sqm of GFA that when included, result in a GFA of 1,710sqm and a FSR of 1.55:1. The proposal exceeds the permissible standard by 50.5sqm or three per cent.
45. These areas include a communal waste bin storage room (20sqm), bin storage areas, a second car parking space beneath dwelling T2 that exceeds the maximum car parking provision at Clause 7.5 of SLEP; and motorcycle parking spaces beneath each dwelling that are not required by SDCP2012 controls.

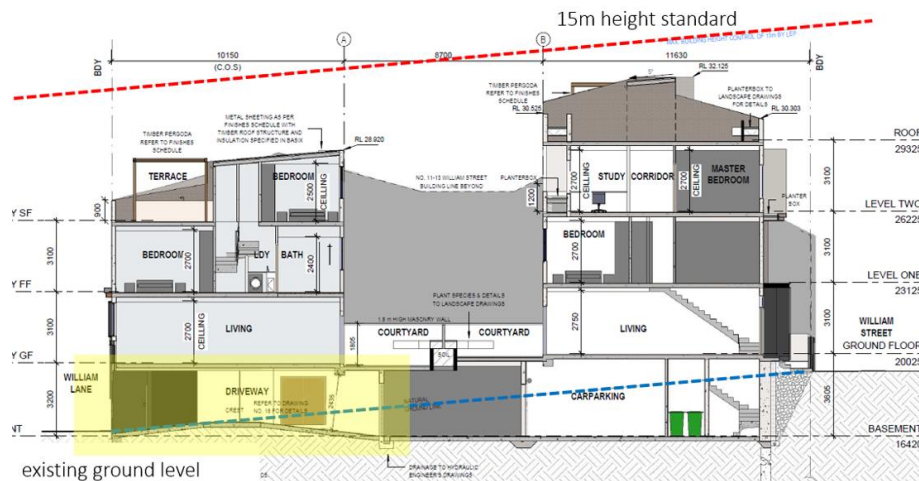


Figure 19: ground level parking area facing William Lane (shaded yellow) does not satisfy the SLEP2012 definition of a 'basement'



Figure 20: Areas within ground level parking area and basement that are excluded in applicant's GFA diagram but that should be included

FSR - Community infrastructure floor space at Green Square

46. In accordance with Clause 6.14 of SLEP2012, the proposed development is eligible for an additional FSR provision of 0.5:1 to provide for infrastructure within the Green Square locality. The proposal does not provide any infrastructure on the site and the contribution contained in the Public Benefit Offer is monetary.
47. The quantum of additional FSR is contingent on the consent authority being satisfied the development is consistent with the key objectives. In particular objective 6.14(1)(b), that requires development to reflect the desired character of the locality and that minimise adverse impacts on the amenity of the locality. In this regard, the subject proposal fails to achieve design excellence by providing poor design and amenity outcomes for future occupants of the site, primarily as a result of insufficient separation between dwellings.
48. There is no rationale for exceeding the controls, particularly where this also results in a development that results in a poor design outcome. Addressing the issues around residential amenity is likely to result in a decrease in floor space. This is to provide increased building separation. Further, the application does not address the FSR that has not been included within the parking areas of the development. The applicant has not provided a clause 4.6 statement that is satisfactory (see discussion below).
49. In failing to satisfy the objective of clause 6.14, the land is not eligible for an amount of additional floor space in accordance with Clause 6.14(4) of the Sydney Local Environmental Plan 2012 and Council as the consent authority is not obliged to accept the Public Benefit Offer that was lodged with the application. Consequently, the application cannot be supported.

Clause 4.6 Request to Vary a Development Standard

50. Clause 4.4 of the Sydney Local Environmental Plan 2012 (SLEP2012) allows for a maximum floor space ratio for the site of 1:1. The applicant has offered to enter into a Planning Agreement to provide for Green Square community infrastructure. In accordance with Clause 6.14 of SLEP 2012. The contribution (if it were to be accepted) allows for an additional FSR provision of 0.5:1 and a total FSR of 1.5:1 (GFA: 1,651.5sqm).
51. The applicant has provided GFA diagrams with the amended proposal that show FSR: 1.48:1 (GFA: 1,629sqm). However, the GFA diagrams do not include approximately 72.6sqm of GFA located within the ground level of the site at William Lane (beneath dwellings T1-T7), including a communal garbage room and areas of GFA located within the garages of dwellings T1-T7.
52. When included, the proposal has approximately 1,702sqm of GFA, resulting in a floor space ratio of 1.55:1. The proposal exceeds the permissible standard by 50.5sqm or three per cent.
53. A written request to vary the floor space ratio development standard in accordance with Clause 4.6 was submitted with the original proposal. The request identifies a non-compliance of only 6.5sqm and understates the extent of the non-compliance.

54. The written request 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;
 - (b) That there are sufficient environmental planning grounds to justify contravening the standard;
 - (c) The proposed development will be consistent with the objectives of the zone; and
 - (d) The proposed development will be consistent with the objectives of the standard.
55. The applicant seeks to justify the contravention of the floor space ratio development standard on the following basis:
- (a) That compliance with the development standard is unreasonable or unnecessary in the circumstances of the case on the following basis:
 - (i) the proposed works represent a desirable and appropriate form of development on the subject site;
 - (ii) the proposed FSR non-compliance will be indiscernible from William Street, William Lane and the adjoining properties;
 - (iii) the bulk and scale of the development is compatible with surrounding existing development and is consistent with the desired future character of the area;
 - (b) That there are sufficient environmental planning grounds to justify contravening the standard:
 - (i) the FSR variation will not be responsible for any unreasonable bulk or scale impacts, noting that the proposal complies with the LEP building height development standard and the DCP 3-storey height limit control (sic);
 - (ii) the proposed FSR variation is not responsible for any unreasonable adverse impacts to surrounding properties in terms of overshadowing, privacy and view loss;
 - (iii) the proposed density, scale and bulk of the development is appropriate and will not appear out of character when viewed in its context of other buildings in the vicinity; and
 - (iv) the proposal includes landscaping at the front and centre of the site on the Ground Floor and First Floor which will soften the built form and will retain existing street trees.

- (c) The proposed development will be consistent with the objectives of the zone;
 - (i) the proposed works represent a desirable and appropriate form of development on the subject site and satisfy objective (a), which is to provide sufficient floor space to meet anticipated development needs for the foreseeable future;
 - (ii) the proposal complies with the LEP and DCP parking rates and satisfy objective (b), which is to regulate the density of development, built form and land use intensity and to control the generation of vehicle and pedestrian traffic;
 - (iii) the minor nature of the variation would not generate any inconsistency with objective (c), which is to provide for an intensity of development that is commensurate with the capacity of existing and planned infrastructure; and
 - (iv) the proposal provides a compatible building envelope without creating a development with overbearing height, bulk or scale and without compromising the desired future character of the area and that complies with the DCP 3-storey height limit control (sic) and satisfies objective (d), which is to ensure that new development reflects the desired character of the locality in which it is located and minimises adverse impacts on the amenity of that locality.
 - (d) The proposed development will be consistent with the objectives of the FSR standard on the following basis:
 - (i) the proposed works represent a desirable and appropriate form of development on the subject site and will have a height, bulk and scale that is compatible with the 3-storey townhouse developments to the north of the subject site. The proposed development is suitably located in an area close to bus services and Green Square railway station.
 - (ii) As such, the proposal satisfies the objectives of the FSR standard, which are to provide a mixture of compatible land uses, integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling and to ensure uses support the viability of centres.
56. Development consent must not be granted unless the consent authority is satisfied that:
- (a) The applicant's written request has adequately addressed the matters required to be demonstrated by subclause 3 of Clause 4.6 being that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and that there are sufficient environmental planning grounds to justify contravening the standard; and
 - (b) 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.

57. In the circumstances of the application, the applicant has failed to adequately demonstrate by way of their submitted Clause 4.6 statement that compliance with the standard is unreasonable and unnecessary and that the objectives of the development standards are achieved, notwithstanding non-compliance with the standard. In particular:
- (a) The written Clause 4.6 statement significantly understates the extent of the non-compliance with the FSR standard. The statement fails to detail the impacts of the proposal accurately and does not enable the consent authority to be satisfied that the arguments put forward in the written Clause 4.6 statement can be justified.
 - (b) The proposal provides dwellings with insufficient separation distance and that with a resulting density the provides poor residential amenity for occupants. The significant understatement of FSR and poor residential amenity demonstrate that key objectives of Clause 4.4(1)(b) and (d) of SLEP2012 are not achieved. The proposal fails to regulate the density of development and provide a built form and land use intensity that reflects the desired character of the locality and fails to minimise adverse impacts on the amenity of that locality.
 - (c) The understatement of FSR and provision of poor residential amenity do not enable the consent authority to be satisfied that key provisions of Clause 6.14(b) and (c) of SLEP0212 can be satisfied. These provisions aim to ensure that greater densities reflect the desired character of the localities in which they are allowed and that increased densities minimise adverse impacts on the amenity of those localities.
58. With regard for clause 4.6(3)(b) of Sydney LEP 2012, the written request provided by the applicant has failed to demonstrate there are sufficient environmental planning grounds to justify contravening the development standard. In particular:
- (a) the statement outlines that the FSR variation is not responsible for any unreasonable adverse impacts to surrounding properties in terms of overshadowing, privacy and view loss, however fails to address that:
 - (i) significant privacy impacts result from insufficient separation distance between dwellings and from opposing windows at various levels of the building;
 - (ii) privacy mitigation measures, including fixed and obscure windows limit natural cross ventilation and create a sense of enclosure within bedrooms provide high residential amenity;
 - (iii) roof level terraces directly overlook neighbouring dwellings, with a dependence on landscaped planter boxes that are difficult to maintain and expensive to remove (upon failure) for future occupants; and
 - (iv) the applicant has failed to demonstrate that sufficient soil depths and volumes are provided at the center of the site where landscaped solutions are proposed to mitigate privacy impacts between dwellings.

59. The applicant's written request has significantly understated the extent of the departure from the development standard and has failed to adequately address the matters required to be demonstrated by subclause 4.6(3) of SLEP2012. The applicant's written request has failed to demonstrate that the proposed development will be in the public interest because it is not consistent with key objectives of the FSR development standard and with a key objective for development within the B4 Mixed Use zone in which the development is proposed to be carried out.
60. The applicant has failed to demonstrate by way of their clause 4.6 statement that compliance with the development standard is unreasonable and unnecessary in the circumstances of the case. In particular, the applicant has failed to demonstrate by way of their clause 4.6 statement that the objectives of Clause 4.4 of Sydney LEP 2012 are achieved notwithstanding non-compliance with the standard.
61. For the reasons provided above, the requested variation to the floor space ratio development standard is not supported. The applicant's written request has not adequately addressed the extent of the non-compliance and the matters relevant to 4.6(3) of the Sydney LEP 2012.
62. Further, the applicant's written statement has not been successful in arguing that one of the five ways established in Wehbe has been satisfied, being that the objectives of the development standard are achieved notwithstanding non-compliance with the standard.
63. The applicant's written statement does not demonstrate the proposal is satisfactory in relation to the environmental planning grounds used to justify contravening the development standard. The proposed development is therefore not in the public interest as it is inconsistent with the objectives of the FSR standard that is applicable to the site.

Residential Amenity - Building Separation

64. Amended drawings show a separation distance of 8.7m between the eastern and western rows of townhouses. The separation distance fails to provide adequate separation between habitable rooms that have opposing windows. Poor residential amenity results from compromised visual and acoustic privacy (Figure 21 below).

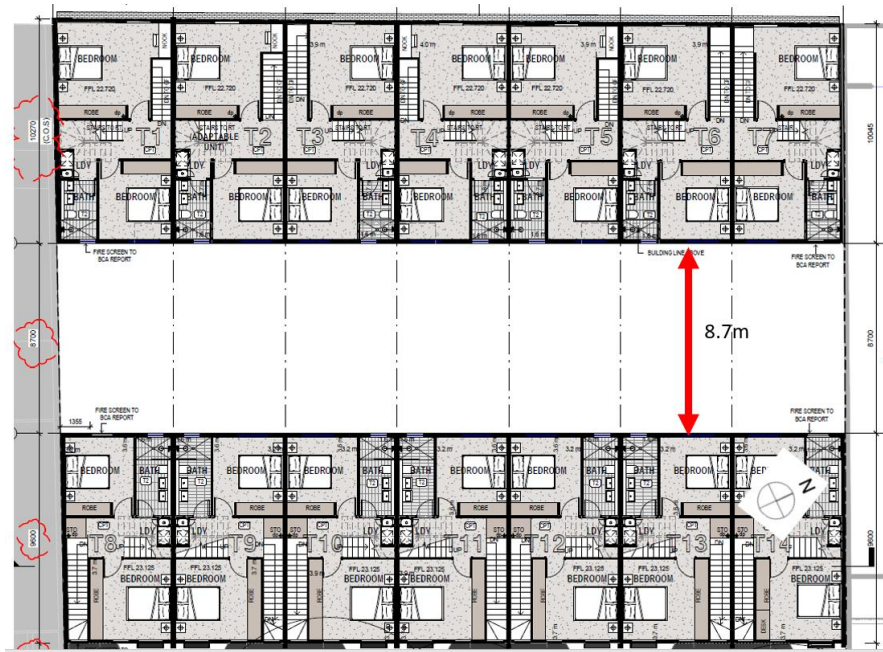


Figure 21: 8.7m building separation and opposing windows

65. The applicant states that the minimal separation strategy follows the approach adopted within a development to the south of the site at 29-41 William Street. Opposing dwellings are separated by 7.7m. This development has used obscure-glazed windows and obscure-glazed, angled balconies that face the internal courtyards (Figure 22 below).

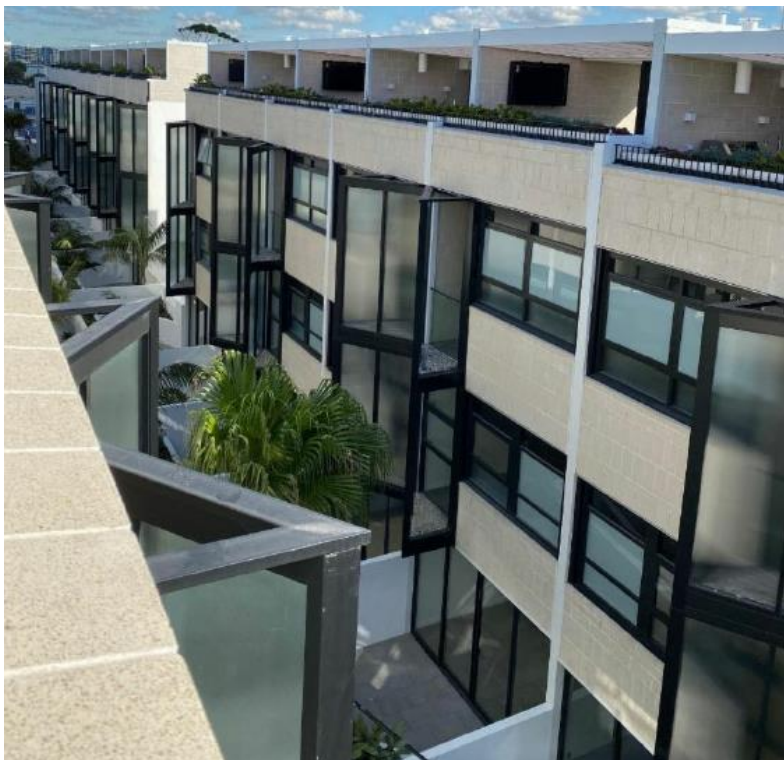


Figure 22: obscure-glazed windows and balconies at 29-41 William Street (source: applicant drawings)

66. The subject proposal provides fixed and obscure glazed windows to a height of 1.8m with smaller operable windows above that height (Figure 23 below). The fixed and obscure glazed windows reduce natural cross ventilation to the dwellings and create a sense of enclosure within bedrooms.

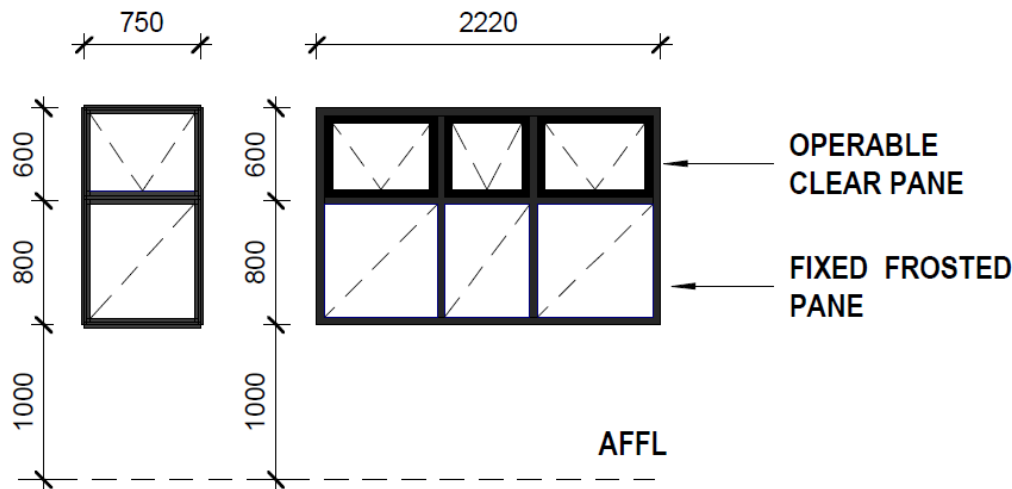


Figure 23: Proposed windows facing internal courtyards within the subject site, with fixed, obscure-glazed windows to 1.8m and operable windows above

67. The Design Advisory Panel (Residential Subcommittee) advised that the Apartment Design Guide (ADG) can be used as a guide to assessment. The ADG specifies that a minimum of 12m separation should be provided between habitable windows or balconies.
68. The 12m separation distance specified by the ADG should establish a minimum target for this development in the absence of alternative mitigation strategies. Superior privacy mitigation strategies have been employed within neighbouring sites to the north and south of the subject site that were also designed by the project architect. Examples are discussed below in the following paragraphs.
69. At 1-9 William Street (D/2014/1028) - residential apartment building:
- (a) apartments at the northern part of the development have been designed so that habitable rooms face non-habitable rooms. Dwellings are separated by a genuine deep soil zone to enable growth of landscaped screening (Figure 24); and
 - (b) apartments at the southern part of the development have been designed with habitable to non-habitable interfaces between dwellings (Figure 24).

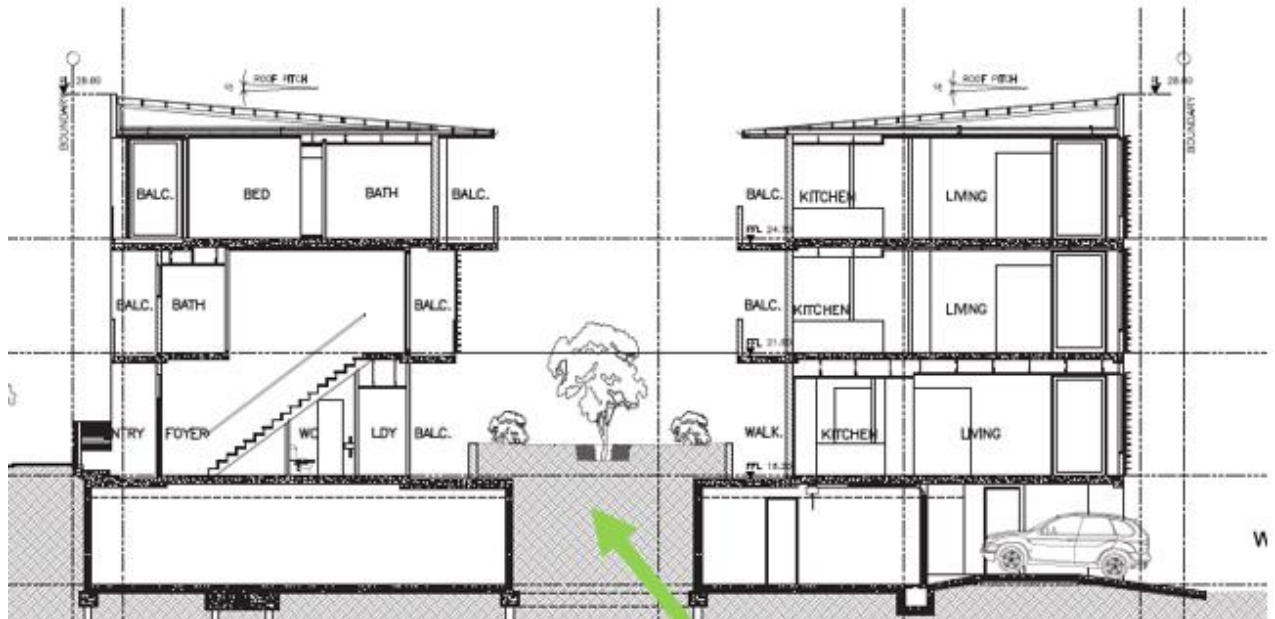


Figure 24: genuine deep soil separating apartments at 1-9 William Street

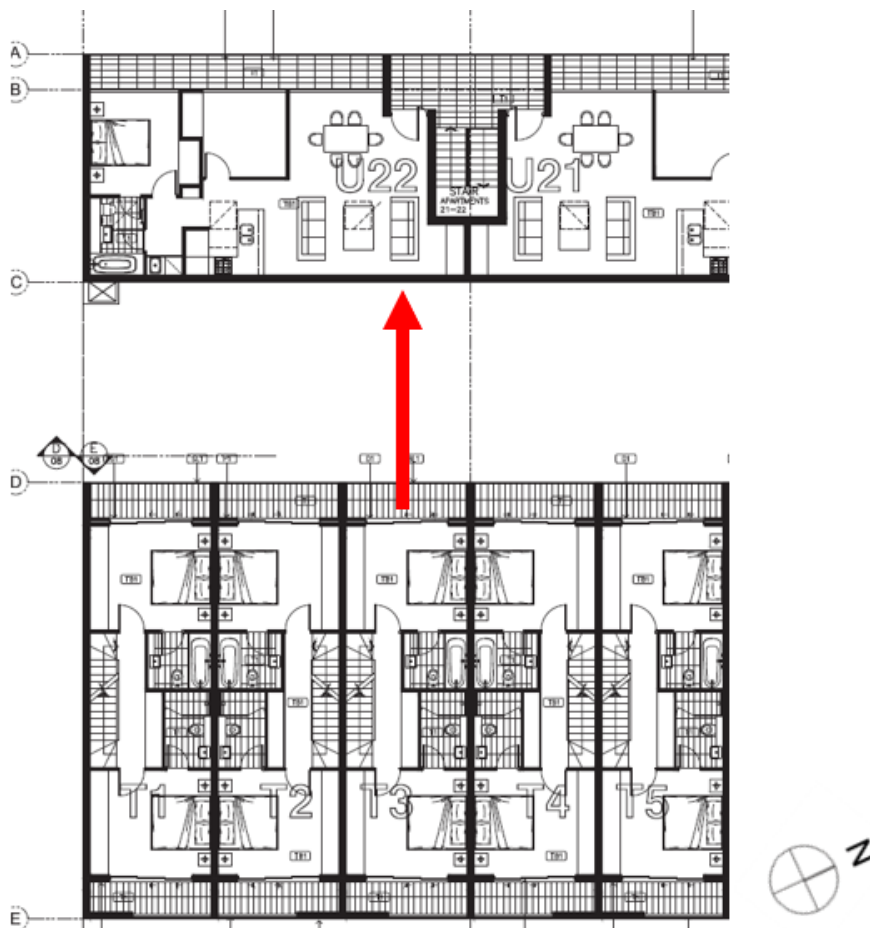


Figure 25: approved floor plans for apartments within 1-9 William Street, showing balconies facing blank walls opposite

70. At 19 William Street (D/2013/62) - 6 x 3 storey townhouses and 2 x apartments:
- (a) multi-dwelling houses have been designed such that their balconies face the external walls (with no windows) of apartments opposite (Figure 26).

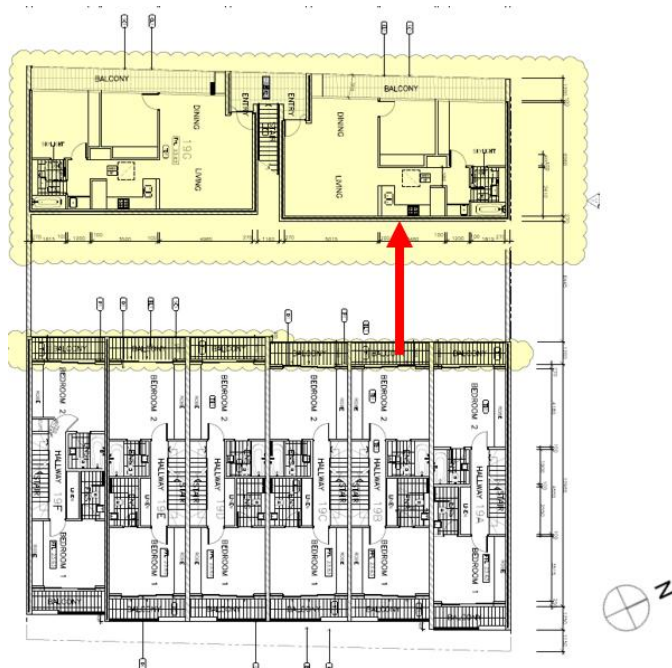


Figure 26: approved floor plans for dwellings at 19 William Street showing balconies facing blank walls opposite

71. At 21-27 William Street (D/2015/145) - residential apartment building:
- (a) dwellings have been designed with non-habitable to non-habitable interfaces and with an appropriate deep soil zone to enable growth of landscaped screening (Figure 27).

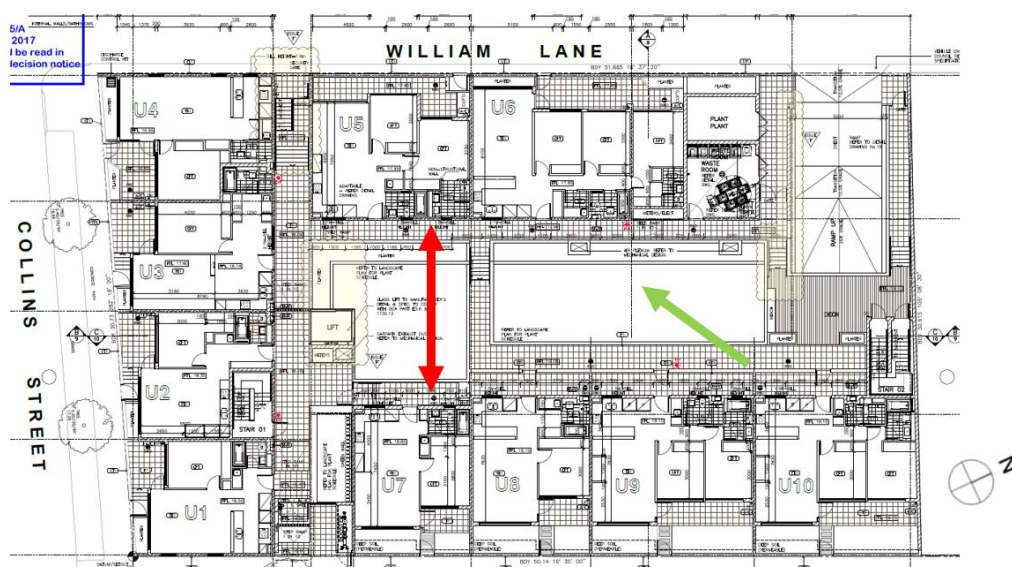


Figure 27: approved floor plans for apartments within 21-27 William Street, showing genuine deep soil, outward-facing living areas and no opposing windows

Visual Privacy - Landscaping

72. Amended drawings included a line of site diagram showing the degree of overlooking from the roof level of dwelling T1 (Figure 28 below). The diagram shows that visual privacy is proposed to be mitigated using planter boxes at the edges of the roof terraces.
73. The planter boxes provide horizontal separation and are landscaped, however they are to be maintained by the residents of individual Torrens titled dwellings and are unsafe given their elevation above ground levels. Given they will be difficult and dangerous to maintain, it is likely many of the planter boxes will fail throughout the development. This would result in a deleterious impact upon the building facades and result in visual privacy impacts.
74. This form of privacy mitigation provides an architectural feature that is difficult to maintain and expensive to remove for future owners.
75. The diagram illustrates that despite the planter box, the roof terrace will directly overlook the living spaces of neighbouring development at 19 William Street and the bedroom windows of dwellings within the same development at the eastern side of the site.

Site Landscaping

76. The scheme is reliant on site landscaping to mitigate visual privacy impacts caused by insufficient building separation. Issues with the proposal include:
 - (a) Only a small section of genuine deep soil is provided at the William Street frontage for the provision of meaningful plantings. Planters planter boxes at the central courtyard do not constitute genuine deep soil as defined by the City's Landscape Code as they are located on top of structures.
 - (b) Planter boxes within the central courtyards have areas of 3.9sqm and depths of 700mm. They are not sufficient to support small canopy trees with volumes of 2.7 cubic metres each, noting the Landscape Code requires 9 cubic metres and soil depths of 800mm.
 - (c) The proposal relies on numerous planter boxes throughout the building facades to soften its appearance at levels 2 and 3 of the building. The planter boxes are impractical and unsafe to maintain, and would be expensive to remove for future owners of the development.



Figure 28: Drawing extract provided by the applicant showing a high degree of mutual overlooking. Privacy impacts are proposed to be mitigated by planter boxes that are 2-3 storeys above ground levels, at the edges of the building. The planter boxes are dangerous to maintain considering there is no strata manager to arrange professional maintenance.

Design Excellence

77. The proposed development provides inadequate separation distance between opposite dwellings and fails to provide high residential amenity for future occupants. The impacts of directly opposing windows are proposed to be mitigated by fixed and obscure glazing that have resultant impacts for occupants by providing minimal window openings and unnecessary sense of enclosure.
78. Inadequate soil volumes are provided within central garden planters that are intended to facilitate sufficient landscape plantings to mitigate privacy impacts.
79. The proposal relies on numerous planter boxes throughout the building facades to soften its appearance. The planter boxes are impractical and unsafe to maintain due to their height and edge location, and in the event of multiple garden box failures, would have a deleterious impact on the building facades. They will be difficult to maintain and expensive to remove for future owners.
80. The building proposes facade treatments that are unclear in that the Schedule of Finishes refers to building materials 'or similar'. Front second level balconies use painted wall finishes that are incongruous to face brick lower sections and vertical wall cladding reads as a continuous vertical plane that adds to the excessive bulk of the upper level of the building.
81. The proposal fails to deliver the highest standard of architectural, urban and landscape design, with regard for the residential amenity for its intended future occupants and neighbouring buildings and with regard for suitable building bulk, massing and modulation. The proposal fails to provide excellence and integration of landscape design.

Consultation

Internal Referrals

82. The application was discussed with the City's Design Advisory Panel (Residential Subcommittee) and with other specialists. Objections were raised to the proposal as outlined below.

83. The City's Design Advisory Panel (Residential Subcommittee) and urban design specialist raised issues in relation to:

- (a) The typology of the development, questioning whether the development should be considered a residential apartment building for the purposes of assessment and that there is inadequate separation distance between the eastern and western rows of dwellings.

Comment: all dwellings have direct access at the ground level from the roadway and as such, satisfy the definition of multi-dwelling houses. The ADG does not apply to the development, however is useful in providing a guide to assessment of residential amenity as outlined above.

- (b) the proposal should not exceed the relevant FSR and the maximum height in storeys (3 storeys);
- (c) increasing the provision of deep soil planting, preferably in the internal courtyards and separation distance between eastern and western dwellings. Setbacks should be increased at William Street to provide for canopy trees;
- (d) air-conditioning units are shown in internal courtyards and should be located at the roof level;
- (e) switch boards and fire services form prominent features at the building edges and should be integrated into the architecture of the building to ensure they are not visually dominating;
- (f) insufficient detail in relation to solar access for neighbouring dwellings;
- (g) aesthetics are underdeveloped including within central courtyards and use of 'or similar' for materials schedules.

Comment: the issues raised by the DAP Residential Subcommittee were included in a letter requesting amended drawings. Amended drawings were submitted for assessment, however do not resolve the issues outlined above.

84. The City's Landscape specialist raised issues in relation to:

- (a) the aspiration for raised planters, green walls and a verdant green development at the ground level is not reflected in the proposed plans that show a series of narrow planters with minimal soil depth and soil volume;
- (b) the proposed landscape not being feasible and not complying with the Sydney Landscape Code and planning control in relation to achieving desired privacy mitigation, canopy cover and maintenance.

85. The City's waste specialist raised issues in relation to inaccurate calculation of waste generation and that a bulky goods waste storage room has not been provided.
86. The City's Public Domain specialists advised that proposal involves stormwater being discharged to the kerb and gutter and that this will cause flooding at the basement entry. A Stormwater Quality Assessment and amended Stormwater Concept Design were requested. The applicant has failed to provide the requested stormwater details with the amended drawings.
87. The City's health and building specialist advised that the documents lodged with the application to address the provisions of the State Environmental Planning Policy No 55—Remediation of Land are unsatisfactory. An addendum document was requested to be peer reviewed by a Site Auditor resulting in either a Section A Site Audit Statement to endorse the previous conclusions within the DESI that the land is suitable for the proposed use or to provide a Remedial Action Plan (RAP) to make the Site Suitable for the proposed use. The applicant has failed to provide the requested contamination details with the amended drawings.
88. The City's transport specialist advised that the proposal should be redesigned to encourage Sustainable Transport (and Active Transport) in a manner which aligns with the targets and objectives set out in Sustainable Sydney 2030.
89. The City's surveyor is of the view that whilst the Draft Plan of Stratum Subdivision is generally satisfactory, there are several easements not shown that should be provided. Further, as there will be no Owners Corporation, it is recommended that a BMS (Building Management Statement) be prepared and registered with the subdivision and in the absence of a BMS, a positive covenant for maintenance of common areas, including the roof and external structure of the building be prepared.

External Referrals

Ausgrid

90. Pursuant to Section 45 of the SEPP (Infrastructure) 2007, the application was referred to Ausgrid for comment. A response was received raising no objections to the proposed development.

Water NSW

91. The application was referred to Water NSW for comment. A response was received raising no objections to the proposed development.

Advertising and Notification

92. In accordance with the City of Sydney Community Participation Plan 2019, the proposed development was notified and advertised for a period of 21 days between 28 October 2020 and 19 November 2020. Two submissions were received in objection to the proposal.
93. On 11 June, Council's assessing officer became aware of an issue with the original notification of the development application. Whilst site notices had been installed at the site boundaries, letters had not been sent out to neighbours. This was attributed to an IT issue.

94. Consequently, the application was re-notified for a period of 14 days, between 2 June and 24 June 2021. No submissions have been received to date following the re-notification of the proposal.
95. Submissions received following the initial notification period raised the following issues:
- (a) Issue: The proposal exceeds the FSR control and the height in storeys control, setting a poor precedent.
- Response: the proposal exceeds the FSR and the height in storeys control. The scheme provides poor residential amenity due to inadequate building separation and is recommended for refusal.
- (b) Issue: Loss of visual and acoustic privacy due to roof level terraces and overshadowing impacts.
- Response: proposed roof terraces will overlook neighbouring dwellings in the event landscaping fails. See discussion above in the Issues section.

Financial Contributions

Contribution under Section 7.11 of the EP&A Act 1979

96. In the event the proposal was supported, it would be subject of a S7.11 contribution under the provisions of the City of Sydney Development Contributions Plan 2015.

Contribution under Section 7.13 of the Sydney Local Environmental Plan 2012

97. The site is located within the Green Square affordable housing contribution area. In the event the proposal was supported, it would be subject to a Section 7.13 contribution.

Relevant Legislation

98. Environmental Planning and Assessment Act 1979.

Conclusion

99. The application fails to accurately assess floor space ratio and the proposal exceeds the standards set out at clauses 4.4 and 6.14 of SLEP2012. While a public benefit offer to provide a monetary contribution toward community infrastructure in Green Square has been made, it is not supportable.
100. The applicant's request for a variation to the floor space ratio development standard fails to adequately address the requirements under clause 4.6 of SLEP2012 as outlined elsewhere in this report. The applicant fails to state the quantum of the non-compliance with the standard and has not demonstrated that compliance with the standard is unreasonable or unnecessary in the circumstances of the application.

101. The proposal is not considered to exhibit design excellence in accordance with the requirements of Clause 6.21 of Sydney Local Environmental Plan 2012 as it fails to deliver the highest standard of architectural, urban and landscape design. The proposal provides poor residential amenity for its intended future occupants.
102. The proposed development does not satisfy the matters for consideration provided by Section 4.15 of the Environmental Planning and Assessment Act 1979 in that it is not compliant with key provisions of SLEP2012 and SDCP2012. As such, the proposal fails to provide development that is suitable for the subject site.
103. The public interest cannot be served by the approval of an application that fails to meet the minimum amenity requirements of the relevant planning instruments and that is not in keeping with its immediate context and neighbouring development in relation to building separation, landscape and deep soil provision and neighbourhood character.

ANDREW THOMAS

Executive Manager Planning and Development

Adrian McKeown, Senior Planner.