

7 March 2018

Ms Ann-Maree Curruthers
Director, Sydney Region West
NSW Department of Planning and Environment
10 Valentine Avenue
PARRAMATTA NSW 2150

Attention: Christine Gough, Specialist Planning Officer

Dear Ann Maree,

Planning Proposal (PP_2017_COPAR_003_00)
107 George Street, Parramatta

I write to you in relation to a Planning Proposal to amend the height of building and floor space ratio controls under the Parramatta Local Environmental Plan (LEP) 2011 for land at 107 George Street, Parramatta.

The Planning Proposal was issued a Gateway determination under Section 56(2) of the *Environmental Planning and Assessment Act* (The Act) 1979 on 8 January 2018. The Gateway determined that the matter should proceed subject to conditions. In determining the proposal be supported, the Gateway endorsed a proposal that is not supported by the proponent and is not sought. It is therefore requested that the Gateway determination be reconsidered and re-issued by the delegate of the Greater Sydney Commission (GSC) in respect to the proposal as sought and the evidence base provided for the desired scheme.

Subject Site

The land to which the Planning Proposal applies is located at 107 George Street, Parramatta (see Figure 1 below). The site is known legally as Lot 67 DP 633057 and has a site area of 630sqm. The site currently contains a three-storey concrete framed building, which previously accommodated the Gold's Gym and is currently home to the Parramatta PCYC (see image at Figure 2 below). It has a 20-metre frontage to George Street and a depth of 30 metres.



Figure 1: Subject site

The site is on the eastern side of the Parramatta CBD in an area characterised by existing and proposed medium to high density development. Adjoining to the west is a 7 to 10 storey mixed use development, and 109-113 George Street to the east contains a 20-storey building. Further, two proposals are well advanced Directly opposite the site (on George Street) which will deliver developments at 38 storeys (184 George Street) and 60 storeys (180 George Street). Development along nearby Church Street will rise to heights in the vicinity of 46 storeys. The site is clearly an isolated development lot within the broader block.



Figure 2: Picture of site (Feb 2018)

Stanisic Architects have undertaken a detailed Urban Design Analysis that considered the opportunities and constraints of the site, and informed the controls proposed by the applicant through the implementation of a number of key design principles. The Analysis tested a number of options for a 35 storey building to achieve acceptable amenity standards in relation to SEPP 65, that maintained acceptable building separation and visual privacy between buildings while orientating units away from the rear boundary.

Having established an appropriate built form, the Analysis tested the impact on the surrounding context by testing a range of building heights. The 35 storey option was preferred given its superior urban design and environmental and economic performance. This is discussed further below.

While Clause 7.2 of the Parramatta LEP 2011 exists to encourage amalgamations and facilitate larger building footprints, it is also evident by the intent of the draft Clause 7.2 provisions under the draft CBD Planning Proposal that this isn't always possible, and an acceptable form of development is still achievable. A small site isn't an inhibitor to high density; although amalgamation is preferable, which is sensible.

In this case, amalgamation provides minimal benefit to future development and the urban design outcome. A sensible tall high-density development can achieve the same quality and standard of developments that achieve a site area compliant with a non-evidence based numerical standard. Site specific merit needs to be applied in this case, which is what the exempt provisions of the sliding scale seeks to facilitate.

Planning Proposal

Current Controls

The following controls currently apply to the subject site:

- Zoned B4 Mixed Use;
- A maximum FSR of 6:1 (maximum FSR of 4:1 can be achieved under the existing Clause 7.2 of Parramatta LEP 2011); and
- A maximum building height of 54 metres. Adjoining and nearby land to the west and north allows and proposed maximum building heights of ranging from 72 metres to 190 metres.

Lodged Planning Proposal

The Planning Proposal was lodged on 8 July 2015 seeking to increase the maximum FSR from 6:1 to 20:1 and the maximum building height from 54 metres (17 storeys) to 120 metres (38 storeys).

A revised urban design report was lodged in January 2016 refining the development concept. This sought to increase the FSR to 20:1 (23:1 including design excellence) and the height to 122 metres (35 storeys).

The Planning Proposal will facilitate a 35-storey slender tower containing 5 levels of commercial floorspace and 30 levels of residential floorspace. The development includes 4-5 units per typical level, presenting as a 3-storey scale to George Street to the east and west and reinforcing the civic importance of George Street.

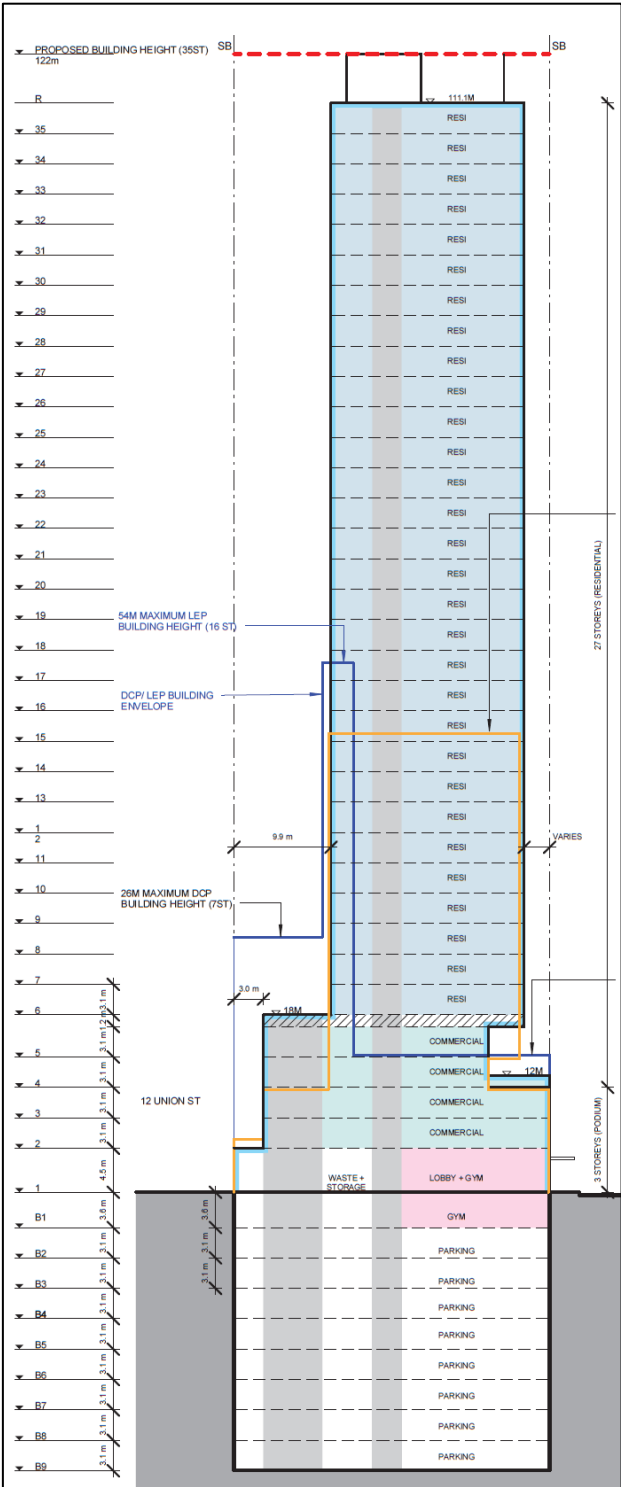


Figure 3: Proposed Form



Figure 4: Photomontage

CBD Planning Strategy/Planning Proposal

The CBD Planning Strategy was adopted on 11 April 2016. The Strategy provides for no height limit and a maximum FSR of 10:1 for the subject site. However, the sliding scale provisions of draft Clause 7.2 will apply. As the site is less than 800sq.m (630sq.m), the FSR achievable on the site will be no greater than 6:1.

The new FSR sliding scale provision under the CBD planning framework includes new provisions under Clause 7.2 to enable sites to achieve the maximum FSR if various requirements pertaining to design excellence, SEPP 65 compliance and street activation were achieved. This policy has been maintained by the Council to date and is contained in the draft CBD LEP provisions currently awaiting Gateway determination. This policy direction was in recognition that there may be circumstances where sites cannot viably and economically be amalgamated. To allow flexibility in the planning system, the Council resolved to include a 'alternate FSR Clause' that *"allows any site to achieve the maximum FSR permitted by the maps subject to meeting the following criteria:*

- (a) the development has been subject to a competitive design process and exhibits design excellence as provided in clause 7.10; and*
- (b) if the development includes residential accommodation, that:*
 - (i) the development includes community infrastructure; and*
 - (ii) the development complies with State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development and the Apartment Design Guide published by the NSW Department of Planning and Environment in July 2015; and*
- (b) the ground floor of all sides of the building facing the street and any other publicly accessible areas will be used for the purposes of business premises or retail premises.*

Subsequently, in May 2016, the Council at its first meeting under Administration endorsed the George Street planning proposal with draft land use controls inconsistent to that of the City Centre LEP endorsed just a few weeks earlier. This seriously brings in to question the consistency and application of development controls being applied across the CBD.

While the sliding scale provisions are intended to promote amalgamation, the 'alternate FSR Clause' seeks to promote flexibility in the planning system. Given the majority of the block has been redeveloped and the minimal benefit in relation to amalgamation and better built form outcomes that could be achieved by amalgamation, the site-specific merit and better outcomes need to be considered in accordance with the criteria identified in the draft sliding scale provisions. This is a sensible approach for sites that are arbitrarily considered small and therefore must be constrained by their size. The urban design and amenity impacts are considered and addressed further below.

The urban design massing has demonstrated how the site can develop to a height of 35 storeys and 20:1 with limited impacts. The Council under Administration however elected to endorse a Planning Proposal that effectively limits the site to 6:1 by removing the sliding scale provisions that would have limited the site to an FSR of 4:1. In removing the sliding scale provisions the Council and the Gateway effectively recognised the restrictive nature of the policy on this small site. The CBD Planning Proposal however, applies an FSR of 10:1 and omits the sliding scale provisions for small sites such as this subject to meeting important urban design criteria identified above. The approach taken therefore by Council and the Gateway is clearly not the most logical and appropriate to get the best design response from the site, having regard to the extensive work already undertaken.

Determined

Parramatta City Council went into administration in May 2016 as the NSW Government Local Government amalgamations were implemented.

Council considered the Planning Proposal at its first meeting under administration on 23 May 2016. The Council report provided a number of options. Council resolved as recommended by the report as follows:

“(a) That Council endorses the revised planning proposal contained at Attachment 1 to:

- o Exempt the site from Clause 7.2 sliding scale of PLEP 2011, permitting a maximum floor space ratio of 6:1 (6.9:1 with design excellence bonus);*
- o Apply no height limit but apply Clause 7.6 Airspace Operations to this site to require consideration of Federal Government airspace provisions;*
- o Require 1:1 commercial floor space (included as part of the 6:1 FSR).”*

On 5 September 2017 the Planning Proposal was submitted to the Department of Planning and Environment for consideration by the Gateway.

Gateway Determination

A Gateway determination was issued on 8 January 2018. The Gateway resolved as follows:

“...that an amendment to Parramatta LEP 2011 to alter the height of building and floor space ratio controls at 107 George Street, Parramatta should proceed subject to the following conditions:

- 1. Prior to community consultation the planning proposal is to be updated to:*
 - a. Address the draft Greater Sydney Region Plan and Revised draft Central City District Plan*
 - b. Provide appropriate documentation to address flood mitigation and safety implications relating to basement car parking and intensification of uses on flood prone land consistent with the NSW Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005. The NSW SES is to be consulted during this process.*
 - c. Revise the urban design report to demonstrate that an FSR of 6.9:1 can be accommodated on the site, with a minimum commercial FSR of 1:1 and reduced car parking, taking into account the findings of the flood investigations required in 1(b) above; and*
 - d. Amend the height of building map to include a maximum height of building control consistent with the findings of the revised urban design report.”*
- 2. Community consultation is required under sections 56(2)(c) and 57 of the Act as follows:*
 - a. The planning proposal must be made publicly available for a minimum of 28 days; and*
 - b. The relevant planning authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with the planning proposals as identified in section 5.5.2 of A guide to preparing local environmental plans (Department of Planning and Environment 2016).*
- 3. Consultation is required with the following public authorities and organisations under section 56(2)(d) of the Act and/or comply with the requirements of relevant Section 117 Directions.*
 - Transport for NSW*
 - Roads and Maritime Services*
 - NSW State Emergency Services; and*
 - NSW Office of Environment and Heritage – Heritage Division*
- 4. A public hearing is not required to be held into the matter by any person or body under section 56(2)(e) of the Act. This does not discharge Council from any obligation it may have otherwise have to conduct a public hearing (for example, in response to a submission or if reclassifying land).*

5. *The timeframe for completing the LEP is to be 12 months following the date of the Gateway determination.*

Note, the Planning Proposal does not seek any amendment to the FSR. The current FSR is 6:1 and this remains under the Planning Proposal endorsed by the Gateway. However, the Planning Proposal provides that the site will be exempt from the current sliding scale provisions of the LEP which would otherwise have limited the FSR to 4:1.

Under the CBD Planning Proposal, the site is mapped/proposed with an FSR of 10:1. This would also include the sliding scale provisions, which also include exempt provisions or the “FSR out clause” to ensure additional FSR is appropriately interrogated through the provisions of the Clause. This would potentially allow an FSR of up to 11.5:1 with design excellence, which equates to 22 storeys; not significant for this part of the CBD. Therefore, the Planning Proposal submitted to the Gateway is inconsistent with the policy direction of the elected Council for this site under the CBD Planning Proposal. Further, the Gateway noting the benefits to a greater density on the site has in itself applied an “FSR out clause” by endorsing an exemption to the current sliding scale provisions by removing its application to the subject site.

Table 1 below illustrates the background to how the controls have evolved since lodgement to Gateway.

	EXISTING	LODGED	DETERMINED	CBD PLANNING STRATEGY	GATEWAY
FSR	6:1 (4:1 when applying sliding scale)	20:1 Plus 15% design excellence	No change to FSR (currently 6:1 plus 15% design exc.) Removed sliding scale provisions.	10:1 (6:1 when applying sliding scale – however this includes exemption provisions Plus: 15% design exc	No change to FSR of 6:1 (remove existing sliding scale provision) Plus 15% design exc
HEIGHT	54 metres	122 metres	NIL	54 metres	Apply a Height
TOTAL FSR	4:1	20:1	6.9:1	11.5:1	6.9:1

Table 1: Background to controls

Request

The Gateway determination in supporting the progression of the Planning Proposal has not responded to the controls and provisions provided by the Parramatta CBD Planning Strategy and associated Planning Proposal. Further, the Planning Proposal endorsed by the Gateway is not sought by the proponent and not supported for progression.

The Planning Proposal restricts the site potential maximum FSR to 6.9:1 (including design excellence). The ability of the site or lack thereof to amalgamate with the adjoining property has not eventuated, however any amalgamation would not benefit the site anyway in terms of built outcome and development potential. Amalgamation would not reach the numerical standard (i.e. 1000sq.m) under the sliding scale provisions of the Parramatta LEP 2011. The draft CBD Planning Proposal sliding scale provisions provide for an 800sq.m standard and achieving this would only facilitate 0.7:1 additional FSR. However, the sliding scale provisions also allow flexibility for isolated sites where amalgamation has been unable to occur.

The reality is that the Gateway has provided for no flexibility in the planning system which would allow a merit-based process, where further study and assessment could occur if necessary. The landowner has been penalised for having a 'small' isolated site, surrounded by a substantially developed block.

The extensive urban analysis and detailed design work has been undertaken to address many of the Policy issues associated with the intent of the sliding scale provisions and floorspace incentives. The outcome, when combined with design excellence provisions, is a building that is responsive to its context (being the broader block) and of architectural significance. It is not unusual for a building to have a small floorplate, and where it does, unique design responses are required as is the case here.

While approvals of 60 storeys and 38 storeys opposite 107 George Street progress through the Part 3 process, the subject site, is penalised for being a smaller site. It is not clear why the 35 storey original proposal or a 22 storey draft CBD Strategy compliant proposal are not supported on the grounds of urban design and amenity outcomes. The Urban Design Report considers this in great detail. The Council resolution and Gateway appears to apply a pre-determined position that sites less than 1000sqm under the current LEP or 800sq.m under the draft CBD LEP cannot accommodate taller buildings, rather than apply site specific assessment and merit. I note that the numerical standard is proposed to change which brings into question the integrity of its application.

Economic Impact

The economic realities need to be considered having regard to future development potential of the site. While economic modelling has not been undertaken, it is suggested that this should be a logical exercise during the Part 3 process to understand the ability of the site to redevelop.

Notwithstanding, the following observations are made:

- At best, at an FSR of 6.9:1, economies of scale are lost, so in order to make redevelopment viable, the proponent would need to build smaller, lower quality apartments in a lower quantity and less appealingly designed building.
- Small sites do not automatically suggest a market failure, particularly if it can be demonstrated that development is viable on these sites just as much as it is on larger sites.
- The Planning Proposal could potentially support additional apartments in a prime part of the CBD. This will not be an insignificant amount of new supply that will be lost if the development does not go ahead. In the current climate of limited housing supply and high population growth creating an affordability crisis, it would be negligent to hold out for the site to be amalgamated, or constrain the site due to its size, when there is a viable proposal to create new housing.

Urban Design

The Urban Design Report prepared by Stanasic Architects in support of the Planning Proposal included a building envelope study that explored the potential development outcomes of 107 George Street. A number of concerns were raised by Council in its assessment to argue that 20:1 was not appropriate for the site, including:

- SEPP 65 non-compliance
- Potential cumulative traffic impacts
- Extent of blank walls to achieve inter building separation at the expense of highly articulated elevations and the amenity of future residents
- Inconsistent with the objectives of Parramatta CBD Planning Proposal

Stanisic Architects responded to these concerns in detail in a submission to the Department of Planning and Environment on 25 September 2017. Stanisic Architects raised a number of concerns about the accuracy of the justification for the preferred density. This response is attached for reference.

In summary, it should be noted that indicative floor plans were provided to Council and these provided evidence of compliance with the ADG. These are included on pages 76 to 81 of the Urban Design Report. While compliance with the ADG and SEPP 65 was a driving factor behind the design principles, it is also not intended to be used as a mechanism to refuse or limit density in apartment design. This was further reinforced when the Department released Planning Circular 17-001 on 29 June 2017 that stated: “*the ADG is not intended to be and should not be applied as a set of strict development standards*”. This was necessary as Council’s were applying it strictly, this being a case in point.

Further, to limit the extent of any blank walls to a maximum of 8 metres, secondary windows and modelling has been provided along the east and west boundaries. This is further discussed in the attached, but importantly articulation and design can be further considered as part of the Gateway process.

In terms of consistency with the draft Parramatta CBD Planning Proposal, it is clear that the proposed FSR is 10:1 and the “FSR out clause” provides for flexibility in the planning process where criteria can be met, and better outcomes achieved. This would potentially facilitate a maximum FSR of 11:1 rather than 6.9:1 as endorsed by the Gateway. For the Council to therefore state in its assessment that the Planning Proposal is inconsistent with the draft Parramatta CBD Planning Proposal is clearly hypocritical given Council recommends a maximum achievable FSR of 6.9:1, which has been believed and endorsed by the Gateway. This is of great concern in the decision-making process.

Conclusion

This submission has focussed on the inconsistent approach in policy in respect to the subject site and the CBD Planning Strategy and draft LEP controls. It has further considered the treatment of certain sites that can deliver housing while achieving appropriate urban design outcomes and a high standard of design. Encouraging amalgamation of sites is supported but applying restrictive planning controls for sites that are considered ‘small’ and therefore incapable of supporting height and density is not supported.

The democratic policy direction of the Council is clear in its intent, by providing similar policy directions in a draft LEP provision and to a site-specific proposal. It is noted that the recommendation of the elected Council in April 2016 could have been more refined and clear by directly stating the difference between the draft Clause 7.2 under the CBD Planning Proposal and the existing Clause 7.2 provisions under the Parramatta LEP 2011. However, Council has been clear in its recognition that amalgamation may not always be viable or feasible depending on land economics. This doesn’t mean that the outcome will be a bad planning outcome, it simply means it needs to be assessed on its merits and/or further assessment and study undertaken.

Unfortunately, Council's ability to recognise this has not been reciprocated by the Council resolution and the Gateway which has adopted a restrictive approach rather than an opportunistic approach to stimulate the market and support redevelopment.

A number of urban design matters are also raised by Council and the Department in issuing its Gateway. The height sought by the original Planning Proposal and options identified in the urban design analysis is simply a product of the density and design. The development outcome sought would deliver significant residential apartments and commercial floorspace in the immediate vicinity of central Parramatta including the Parramatta train station.

The Gateway determination should be encouraging the redevelopment of the site. In endorsing the Council's Planning Proposal, the proponent has been penalised for the size of the site through the application of restrictive policies. Redevelopment could occur under the draft sliding scale provisions that also allow for exceptions. It could also realise the minimal impacts of the options identified in the urban design report and outcome sought by the proponent.

I therefore request that the Department and the Gateway reconsider its position in relation the Planning Proposal, determination and the restrictive planning approach being applied to 107 George Street. The urban design work has addressed every issue raised and maintains good amenity and design.

The proposal is not inconsistent with the scale and character of emerging development in the immediate vicinity. The Planning Proposal and Gateway determination is also inconsistent with the objectives, intent and controls for the site under the CBD Planning Strategy. It is in this context that this submission is made.

Thank you for your consideration of the content of this letter and request to reconsider and reissue the terms of the Gateway determination related to the Planning Proposal (PP_2017_COPAR_03_00) for land at 107 George Street, Parramatta. I look forward to further consideration of the issues raised.

If you have any questions in relation to this matter, please do not hesitate to contact me on 0437 521 110.

Yours sincerely



James Mathews
Planning Director
Pacific Planning

Attachments:
Stanisic Architects Urban Design Response

22 September 2017

Matthew Daniel
Development Director
Pacific Planning
E: mdaniel@pacificplanning.com.au

Attention: Matthew Daniel

**MIXED USE DEVELOPMENT: PLANNING PROPOSAL
107 GEORGE STREET, PARRAMATTA NSW 2150
FOR PACIFIC PLANNING PTY LTD
RESPONSE TO COUNCIL REPORT 23 MAY 2016**

Dear Matthew,

Further to your request, we have reviewed Council's report and recommendations of 23 May 2016 in relation to the Planning Proposal Application for 107 George Street, Parramatta and provide you with our comments for your consideration:

1. The urban design report submitted with the Planning Proposal is a detailed study of the location, planning framework, streetscape and site, contextual analysis that culminates in a series of design principles that underpin built form options for the site and an outline concept plan. This methodology rigorously reviewed the current planning controls to determine what is reasonable for the site, as it was clear that the current controls are redundant and in need of review. It is also clear that there are numerous planning proposals and development applications that are seeking heights and densities within the immediate context that are significantly higher than what is proposed in this application.
2. As highlighted in Council's report, this is a remnant infill site within a developed block. It is highly unlikely and fanciful to consider that that neighbouring sites to the east or west will redevelop in the medium or long term. Nevertheless, should they redevelop, the proposed outline concept plan illustrates that the built form is capable of achieving compliance with the key amenity standards of SEPP 65 with little impact on neighbouring sites, including the small remnant site to the south.
3. The site at 107 George Street is a compact site (approx. 20m wide x 30m deep) with an area of 631.2sqm and will subsequently will have a higher floor space ratio than another site with a larger site area. i.e. if the site area was larger, a tower form will probably comprise the same gross floor area and form except the FSR would be smaller. FSR on its own is not an effective measure with which to draw conclusions about the appropriateness of a built form and should be considered on merit.
4. The outline concept plan for the site is a study that tests the built form options against compliance with key amenity standards of SEPP 65 as well as the potential character of the proposed built form, but is not a building. A design excellence process would establish the best possible building design solution for the site.
5. Council's report references building separation, sun access and hallway ventilation as reasons for non-compliance with the Apartment Design Guide (ADG). We note that there is no requirement for hallway ventilation in the ADG.

The ADG provides guidance on how to improve the planning and design of apartment developments and is not intended and should not be applied as a set of strict development standards. It was never intended that this document anticipates every development scenario but provides clear objectives and design criteria in which to test a design. On a remnant infill site with neighbouring forms that do not comply with

numeric design criteria of the ADG, the site must be considered on a merit basis and it would be expected that tailored solutions are required to ensure that a high level of amenity can be provided to apartments.

A zero lot setback to the east and west and 12m setback to the south is permitted and is compliant with the ADG. While the numeric design criteria for building separation is not met, Objective 3F-1 is met by incorporating solutions to increase visual privacy to neighbouring buildings.

The reference design included with the planning proposal does include detailed floor plans that illustrate how apartments are planned and compliance with the ADG is achieved. The site is well-suited for residential development with a northern orientation. Three of the four apartments on a typical level are located along the sunny northern frontage with one unit to the south which achieves solar access from the east and west. Approximately 75% (cf. 70% min) of apartments will achieve more than 3 hours of solar access (cf. 2 hours) at mid-winter which greatly exceeds the minimum requirement of the ADG.

The skillful design of the typical level plan also illustrates that three apartments per floor (75%) achieve natural cross ventilation (cf 60% min) which greatly exceeds the minimum requirement up to 10 storeys.

6. Given the site's close proximity to multiple modes of transport, a reduced parking has been proposed over eight basement levels in the outline concept plan (Option C3) with 13 parking spaces per level accessed by a car lift, equating to a total of approximately 104 parking spaces for residential and commercial uses on the site.

The neighbouring sites to the east and west achieve FSRs of 6:1 and 4:1 respectively. These sites are unlikely to redevelop in the medium to long term resulting in a density that is significantly below the anticipated 10:1 in Council's City Centre Strategy and traffic modelling. Taking into consideration an FSR of 20:1 on the subject site, it is estimated that the FSR across the block is 6.6:1 which has a significantly lower with fewer cars. There is no cumulative traffic impacts expected as fewer cars are proposed and encouraged.

7. Secondary windows and modelling is provided along the east and west boundaries (fire-source features) to reduce the bulk and mass of the tower form and limit blank walls to 8m in length. The proposed tower form has a strong vertical expression which offers apartments with views towards the city, river, and park without compromising the visual privacy between buildings.

We note that the recent development to the east, supported by Council and approved as part of a design excellence process incorporates flat and unarticulated blank walls in excess of 10m in length.

There is scope for further articulation and secondary windows along these boundaries to be explored as part of the gateway and design excellence process.

8. Whether or not the subject site is amalgamated with the site to the south, it is not expected that the built form would vary as it already exceeds minimum compliance with the ADG – it will only result in a lower density and number of a map. This site is also not impacted by the proposed development as 2 hours of solar access can be achieved and apartments are oriented away from the southern boundary to preserve visual privacy.
9. The proposed built form includes a two storey waist above level 3 that separates the form into a tower and podium. The podium extends the existing street wall height and utilises sandstone to reflect the heritage school that is opposite the site.
10. Council's report and recommendations contains a number of inaccurate or erroneous claims that misrepresent the content of the urban design report and outline concept design and compliance with the ADG.

The proposed design clearly establishes that a density of 20:1 (23.1:1 including design excellence) is appropriate for the site as it will have little impact on surrounding existing or future developments, exceeds minimum compliance with the ADG, sensitively responds to the heritage significance of George Street and is capable of achieving design excellence.

Should you wish to discuss any aspect of the information package or any other matter relating to the Development Application please do not hesitate to contact Frank Stanisic on 02 9358 2588 or fs@stanisic.com.au.

Yours faithfully,
stanisic architects

A handwritten signature in blue ink that reads "Frank Stanisic". The signature is fluid and cursive, with the first name "Frank" and the last name "Stanisic" clearly legible.

FRANK STANISIC
DIRECTOR