

ECONOMY

ITEM NUMBER 7.8
SUBJECT Planning proposal for land at 5 Hunter Street, Parramatta
REFERENCE RZ/18/2014 - D03995938
REPORT OF Project Officer-Land Use Planning

LANDOWNER/APPLICANT – Hunt Group Pty. Ltd.

PURPOSE:

The purpose of this report is to provide Council with a detailed assessment of a planning proposal and supporting studies for land at 5 Hunter Street Parramatta, and to seek Council's endorsement to forward the planning proposal as amended by this report to the Department of Planning and Environment for a Gateway Determination.

RECOMMENDATION

a) **That** Council endorse the planning proposal at **Attachment 1** subject to amending the sections of the Planning Proposal that deal with the Floor Space Ratio and Height of Building controls so that:-

- Clause 22(3) of Parramatta LEP 2007 (which imposes a sliding scale on this site to limit the maximum FSR to 4:1) no longer applies to this site (so that the maximum FSR currently shown on the Floor Space Ratio map of 6:1 plus design excellence will allow 6.9:1) will apply to this site; and
- the current height shown on the Height of Building map (ie 80m) is retained.

and that the Planning Proposal be forwarded to the Department of Planning to seek a Gateway Determination.

- b) **That** subject to gateway determination and compliance with any conditions the Planning Proposal be publicly exhibited for 28 days.
- c) **That** Council grant delegated authority to the CEO to make any minor amendments and corrections of an administrative and non-policy nature that may arise during the plan making process.
- d) **That** Council invite the proponent to consider making an offer to enter into a Voluntary Planning Agreement (VPA) for the delivery of public benefit in relation to the planning proposal on the basis that any contribution in a VPA would be in addition to Section 94A development contributions payable for the development.
- e) **That** delegated authority be given to the CEO to negotiate the VPA on behalf of Council and that the outcome of the negotiations be reported back to Council.
- f) **That**, any VPA be exhibited in conjunction with the planning proposal or soon thereafter.
- g) **Further, that** the applicant be advised that it would be beneficial if advice could be obtained from the Commonwealth Government Department of Environment indicating their position on this proposal as part of the public exhibition process.

EXECUTIVE SUMMARY

1. This report provides a detailed assessment of the proponent's planning proposal.
2. The assessment has considered the following matters: urban design and built form, heritage, flooding, and transport and accessibility.
3. The assessment also considers development control plan (DCP) matters and voluntary planning agreement (VPA) matters.
4. On account of the recommendations within this assessment, the proponent's planning proposal is recommended to be amended prior to submission to the Department of Planning and Environment (DP&E) in accordance with section 56(1) of the *Environmental Planning and Assessment (EP&A) Act 1979* for a gateway determination.

THE SITE AND SURROUNDING CONTEXT

5. The planning proposal applies to a single parcel of land in the Parramatta City Centre known as No. 5 Hunter Street, Parramatta (Lot 1 DP 613960). The site has an area of 991m².

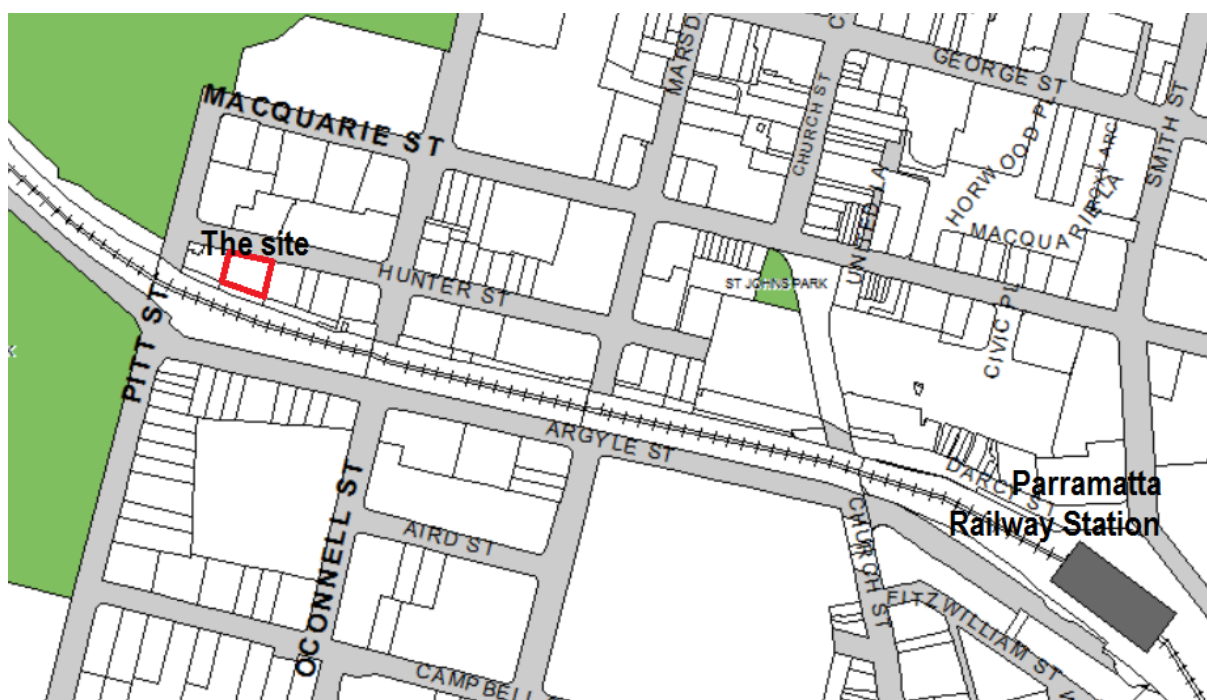


Figure 1 – The site at 5 Hunter Street, Parramatta (Source: Council's GIS)

6. The site is located to the north of the railway line within the north western area of the Parramatta City Centre and is approximately 700 metres walking distance from Parramatta Railway station. Refer to Figure 1.
7. The site currently contains a two-storey commercial building with at grade car parking located at the rear of the site.
8. On 7 June 2013, Council issued a deferred commencement consent (DA/106/2013) for the development of the site for the construction of a 10 storey mixed use development containing 4 ground floor commercial tenancies

and 46 residential apartments over 3 levels of basement car parking. The approved building has a height of 30m (10 storeys) and an FSR of 4:1. The consent has not been acted upon.

CURRENT PLANNING CONTROLS

9. Under *Parramatta City Centre Local Environmental Plan (PCCLEP) 2007*, the site:

a. is zoned B4 Mixed Use as illustrated in the figure below.

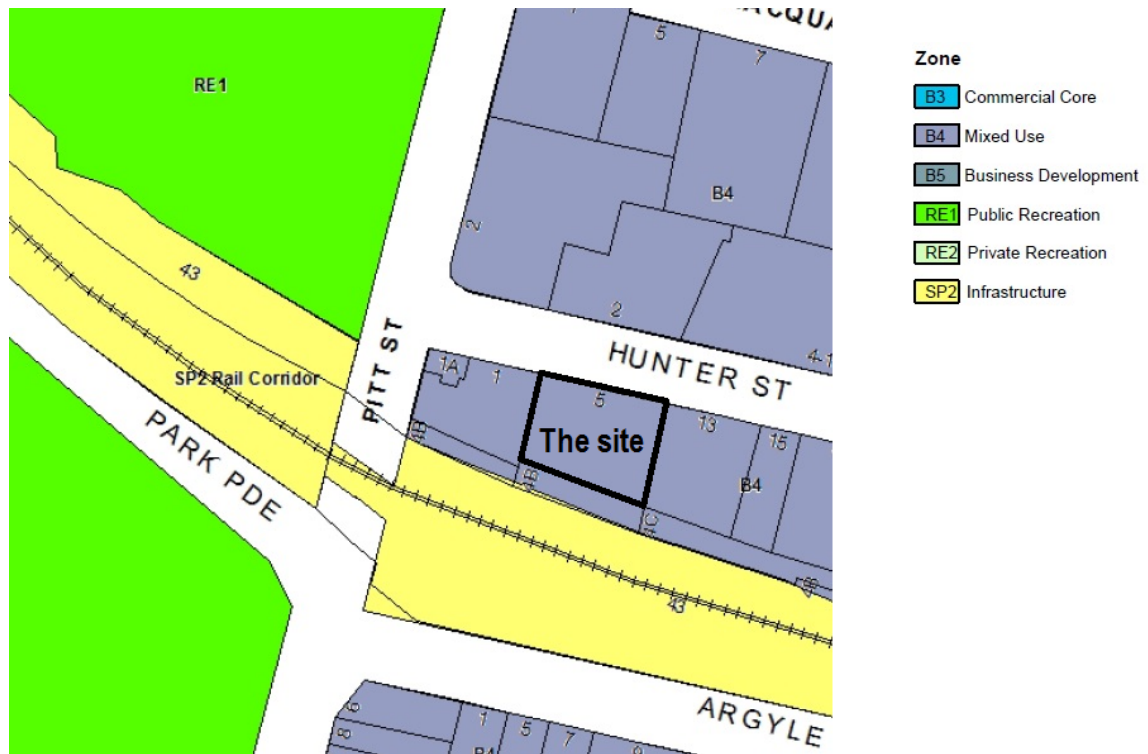


Figure 2 – Land Use Zoning of the site and surrounds (extract from Council's GIS)

- b. has a height of 80 metres (22 storeys) as illustrated in the figure below.



Figure 3 – Height of Buildings applying to the site and surrounds (extract from Council's GIS).

- c. has a FSR of 4:1 (not 6:1 as illustrated in the figure below due to Clause 22.)



Figure 4 – Floor Space Ratio applying to the site and surrounds (extract from Council's GIS).

10. Below is a comparison table of the current controls, the applicant's preferred controls and the principles being applied in the CBD planning framework (although the Park Edge Highly Sensitive Area is not subject to the CBD Planning Framework).

Control	Existing	Applicant Proposed	Principles being applied in CBD Planning framework
Height	80m (26 storeys)	100m (33 storeys)	Subject to FSR and design testing. No height limit change likely required.
FSR	4:1*	11.5:1 (Base FSR 10:1 + design excellence 1.5:1)	6:1 + DE

*An FSR of 6:1 currently applies to the area under the LEP FSR Map as seen above, however, under Clause 22 of the Parramatta City Centre LEP 2007, the applicable FSR is **4:1** for sites less than 1,000m² in area.

11. Under Parramatta Development Control Plan (PDCP) 2011, Section 4.3.3 Parramatta City Centre applies as do other relevant controls across the DCP. The site falls within the Park Edge Special Area as illustrated in the figure below.



Figure 5 City Centre Special Areas (Extract from Parramatta DCP 2011)

12. The recently revised *SEPP 65 – Design Quality of Residential Apartment Development* ensures that the accompanying Apartment Design Guide now provides controls which will impact on the building form outcome.
13. Upon amalgamation of the *PCCLEP 2007* and *Parramatta Local Environmental Plan (PLEP) 2011*, the City Centre design excellence bonus which is achieved through a Design Competition will increase from 10% to 15%.

OLD GOVERNMENT HOUSE AND DOMAIN – HERITAGE CONTROLS

14. The site is within the setting of the Old Government House and the Domain (OGHD). This issue is critical to the Planning Proposal as OGHD is World heritage listed and is one of eleven sites in a group forming the Australian Convict Sites on the World Heritage List. The OGHD is also on the National Heritage List and the NSW State Heritage Register.
15. Under the Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999, development that is likely to have a significant

impact on the world and national heritage values of the OGHG must be referred by the applicant to the Commonwealth Government Department of Environment for approval from the Australian Minister for the Environment.

16. To provide clarity and certainty for development within the setting of OGHG Council has worked with Commonwealth and State Governments to enter into a Conservation Agreement. This agreement is made under the EPBC Act and removes the need for Commonwealth referrals of development within the Park Edge Highly Sensitive Area under the EPBC Act, as long as the proposed development complies with the specified planning controls in the agreement.
17. The planning controls include the applicable maximum building height and floor space ratio controls under the Parramatta City Centre LEP 2007. They also include the DCP controls outlined in Section 4.3.3.7(c) Park Edge of the Parramatta DCP 2011.
18. As the Planning Proposal is seeking to increase the height and floor space ratio controls, the Proposal is deemed as a "Controlled Action" under the EPBC Act and the proponent has submitted the Planning Proposal to the Commonwealth Department of Environment for approval. No approval has been issued and the proponent has not indicated whether any preliminary feedback has been received from the Commonwealth Government.
19. Council officers originally recommended to the applicant that it would be more efficient to obtain Commonwealth government advice on this Planning Proposal as ultimately, the development cannot proceed without Commonwealth Government approval and Council has no control over this approval process.
20. However, the proponent has requested Council proceed with its consideration of the Planning Proposal despite the lack of advice from the Commonwealth government. Council resolved to consider the matter without first obtaining Commonwealth Government approval. The applicant has been advised of the risk that the Council process may proceed but that it may in the end be meaningless without Commonwealth Government endorsement. Notwithstanding, the applicant still wishes to proceed.

THE PLANNING PROPOSAL - PROPOSED PLANNING CONTROLS

21. The applicant's planning proposal comprises the following documents:
 - a. Planning proposal
 - b. Urban Design Study
 - c. Flood Risk Assessment Report (dated May 2011 – prepared in relation to DA/106/2013)
 - d. Maps indicating proposed FSR and HOB
22. The applicant's planning proposal seeks to amend *PCCLEP 2007* by:
 - a. Increasing the height on the Height of Buildings Map from 80 metres (22 storeys) to 100 metres (30 storeys);
 - b. Increasing the FSR on the Floor Space Ratio Map from 6:1 to 10:1*;

*Note: An FSR of 6:1 currently applies to the area under the LEP FSR Map, however, under Clause 22 of the Parramatta City Centre LEP 2007, the applicable FSR is 4:1 for sites less than 1,000m² in.
23. Additional information submitted with the planning proposal explains that the applicant is also intending to rely on the forthcoming revised design excellence

clause which will enable the height and FSR increase by 15%. This will mean the total development standards equate to:

- i. Height – 115 metres (33 storeys); and
- ii. FSR – 11.5:1.

24. The proposed **development concept** includes:

- a. A 31 storey (97.1 metre) high tower inclusive of a 6 storey podium comprising:
 - i. 142 residential units comprised of:
 - 26 x 1 bedroom units;
 - 104 x 2 bedroom units; and
 - 12 x 3 bedroom units.
 - ii. 2 retail premises on the ground floor providing a total of 190m² in floor area.

Note: this is inclusive of the additional 15% of GFA.

25. Seven levels of above ground car parking comprising **111 car parking spaces**. Refer to Figure 6 showing the proposed design concept at the street view in context of the two adjoining properties at Nos. 1 and 11 Hunter Street.
26. The Planning proposal does not include an offer to enter into a Voluntary Planning Agreement (VPA).

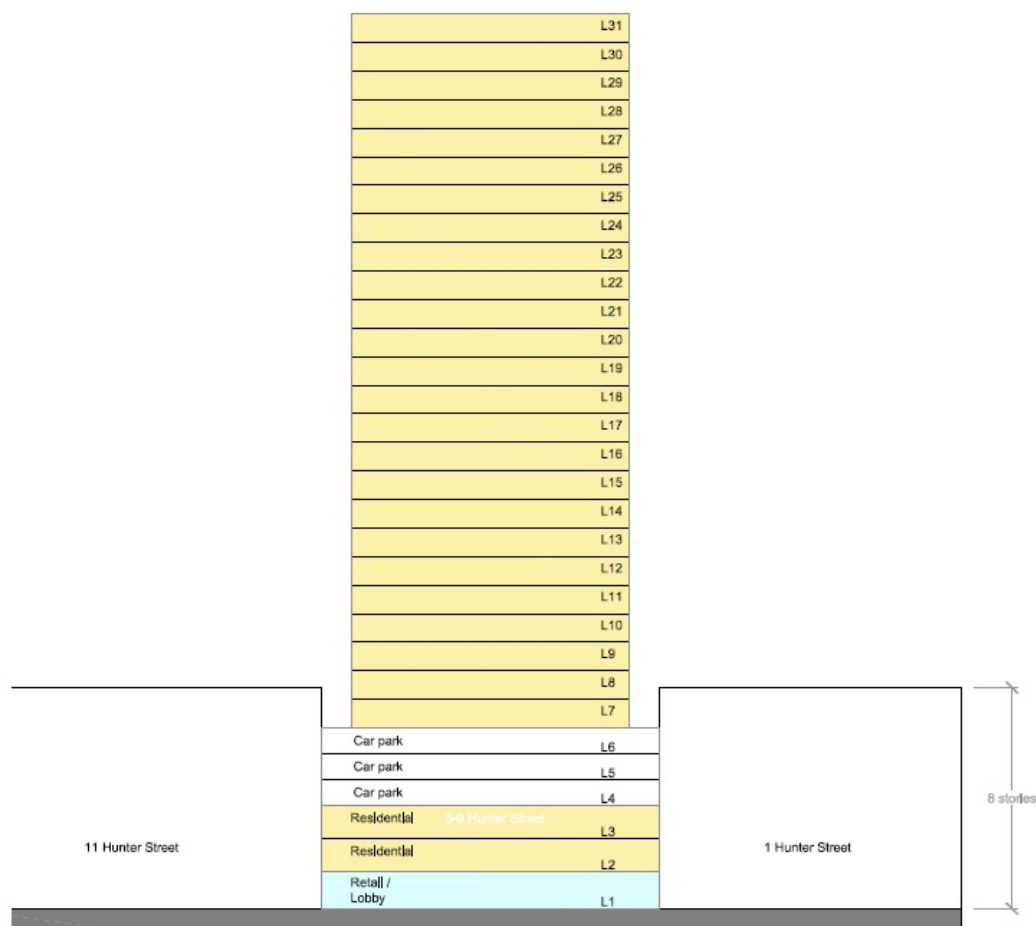


Figure 6 – Design concept (extracted from additional information submitted with planning proposal).

ASSESSMENT

27. A detailed assessment of the proponent's planning proposal and supporting studies is provided below. In terms of internal review, the PP was distributed to the relevant teams within Council for comment in the areas of urban design, heritage, social impact, flooding and traffic and transport. Comments from those teams have been considered in this assessment.

Heritage

28. As discussed above, the site is not itself heritage listed, however, is within the Highly Sensitive Area affected by the views to and from the World Heritage listed OGH. As no approval or advice has been received from the Commonwealth government to date, it is not known whether such an approval will ultimately be received. It is not Council's role to assess the Planning Proposal under the Commonwealth EPBC Act and Council can only comment on local planning controls and local issues.
29. Under the Parramatta City Centre LEP 2007, Parramatta Park and Old Government House are listed as an item of State significance. Parramatta Park and Old Government House are also listed on the State Heritage Register.

30. Council's heritage advisor has noted that the Planning Proposal is currently before the Commonwealth Government and as such provided comments on the Planning Proposal in terms of local heritage issues. While it was noted that in isolation, the Planning Proposal might present an acceptable level of development in the locality, the potential for precedent setting and cumulative visual impacts are significant.

Urban design and built form

31. Council's Urban Design Unit provided comment on the Planning Proposal and made particular reference to the testing that the City Centre Strategy Team has been doing with a sliding scale for FSR on small sites. The testing has concluded that if a site is located in an area that has the theoretical potential to achieve 10:1 but is less than 1,000m² in area (note: the subject site is 991m²) then the maximum achievable FSR is 6:1 (6.9:1 with 15% bonus for design excellence). The reasoning behind this is to ensure that the potential development can achieve compliance with the Apartment Design Guide (ADG) particularly with regard to set backs and to encourage amalgamation which will more likely result in compliance with the ADG and provide better amenity for the residents.
32. Although this site is 'isolated' due to the two adjoining properties being strata titled, with the recent change to the strata laws there is the potential for these sites to turn over and redevelop. As such, it is reasonable to apply the side setbacks from the ADG. The site is also located on a busy railway corridor providing the potential for poor amenity for the occupants. These reasons add further weight to the argument for compliance with the ADG with regard to setbacks.
33. Should the Planning proposal be approved (at 10:1 or 11.5:1 including design excellence) it would likely result in a building that:
- a. does not comply with the ADG and SEPP 65. The reference design in the Planning Proposal indicates side set backs of 6m. Under the ADG, habitable rooms require setbacks of 12m which suggests that the reference design is based on an underlying design of having only non-habitable rooms being hosted along the side walls;
 - b. as such, the building would have blank or poorly articulated facades along the side boundaries as a consequence of the ADG setback requirements on the side boundaries for habitable rooms and balconies; and
 - c. due to the location of the railway corridor will restrict the internal uses to this side of the building again resulting in a blank or poorly articulated rear facade.
34. Should the Planning proposal be approved (at 10:1 or 11.5:1 including design excellence) it would also establish a concerning precedent for the adjoining sites which will have the potential to result in:
- a. Non-compliance with the ADG with regard to building separation requirements due to the narrow width of the sites;
 - b. Compromised internal amenity ; and
 - c. A street wall of very tall towers.

35. The Urban Design team also advised that if the proposal is supported, the proponent should submit revised plans using a floor plate efficiency of 75% for the residential component for the purpose of calculating the gross floor area (GFA). To clarify the issue of floor plate efficiency, it is Council's standard practice for all Planning Proposals and built form testing to adopt a residential floor plate efficiency of 75% when calculating Gross Floor Area (GFA). The applicant has used a floor plate efficiency of approximately 79.5% which could potentially add a further two storeys to the development. As such, the reference design submitted by the applicant is not reflective of the FSR being sought.

CBD Planning Strategy

36. Although the subject site is not included in the CBD Planning Strategy, of some relevance, is the testing of built forms which has been conducted in relation to small sites. Preliminary recommendations are that a sliding scale mechanism, which promotes amalgamation of small sites by allowing the FSR to increase as the site area increases should be retained in Council's CBD planning controls, notwithstanding an overall increase in height throughout parts of the CBD.
37. The built form testing found that trying to achieve an FSR of 10:1 on sites smaller than 1,000m² results in buildings with poor amenity, reduced setbacks, increased privacy conflicts and compromises the ability to achieve design excellence. As such, the CBD Planning Proposal is expected to recommend a lesser FSR for smaller sites. As such, were the CBD Planning Strategy to include the Park Edge Highly Sensitive Area, the subject site would still not be considered appropriate for an FSR of 10:1.

Compliance with Development Control Plan 2011

38. As discussed above, the site is subject to the Parramatta Development Control Plan (DCP 2011) and in particular, the Park Edge special area controls. This section of the DCP contains controls relating to building width (facing OGHD), the street frontage height for podiums, setbacks to the street, and side and rear setbacks for the upper levels of buildings. The reference design submitted with the Planning Proposal is generally compliant with these controls with the exception of the following:
- a. The podium height at 19.6m, is in excess of the 14m maximum height control for podiums.
 - b. The rear setback for the upper levels of the buildings at 3m is less than the minimum 12m rear setback control.
39. Subject to a full assessment at development application stage, it is considered that these non-compliances may be acceptable for the following reasons:
- a. The proposed podium height of 19.6m is more compatible with the adjoining buildings at No. 1 Hunter Street and the building under construction at No. 11 Hunter Street. The built forms approved at 1 and 11 Hunter Street is illustrated in Figure 6. These two sites are low scale buildings at a height of approximately 8-9 storeys (26m) without a tower element.
 - b. The rear setback faces the railway line and as such there is less potential for impacts on nearby development to the south.

Cumulative Impacts

40. The comments from Council's heritage advisor have raised an important issue regarding precedent and the potential for cumulative visual impacts. It is important to note that there is currently another Planning Proposal before Council within the Park Edge Special Area at Nos. 18-22A Hunter Street and Nos. 23-29 Macquarie Street, Parramatta (See Figure 7 below).

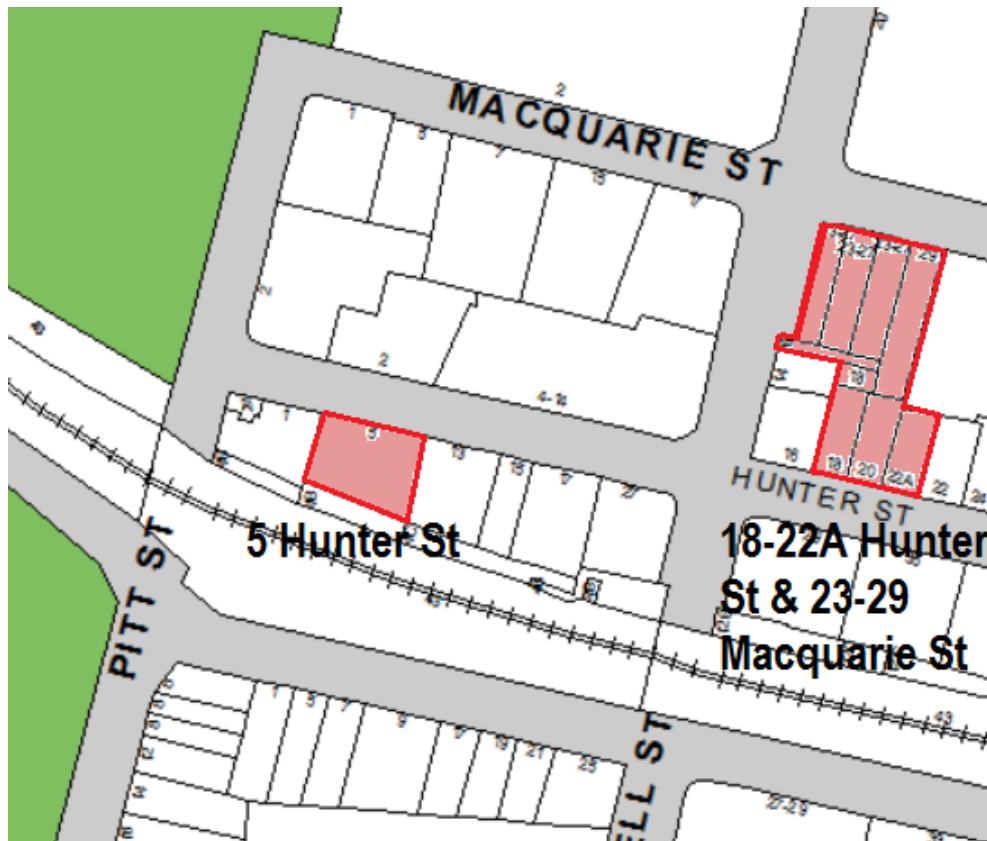


Figure 7 - Subject Planning Proposal in context of the site of the other Planning Proposal before Council for 18-22A Hunter Street and 23-29 Macquarie Street.

41. A Planning Proposal at Nos. 18-22A Hunter Street and Nos. 23-29 Macquarie Street, Parramatta is seeking a similar increase in the HOB and FSR controls to the subject Planning Proposal. It is also seeking an FSR of 10:1 (11.5:1 when including Design Excellence) and a HOB of 120m.
42. As acknowledged in the applicant's Planning Proposal, there are several sites within the vicinity of the subject site that could potentially be redeveloped. It is hence reasonable for Council to consider the precedent-setting effect of any Planning Proposal in the locality. Any increase in FSR and height granted by Council could be sought to be replicated by other land owners in the area.
43. The Urban Design Study submitted by the applicant has attempted to address the cumulative impacts and includes a view analysis of the subject site when viewed from OGHD. This analysis is not considered to be a useful tool for assessment as it appears to reflect current controls in the LEP rather than the controls being sought, nor does it consider the impact on the setting of the World Heritage values of the OGHD.

44. Council's Project Officer – Urban Design modelling has prepared 2 images (shown below) which demonstrate the site when viewed from the OGHD under two different scenarios.

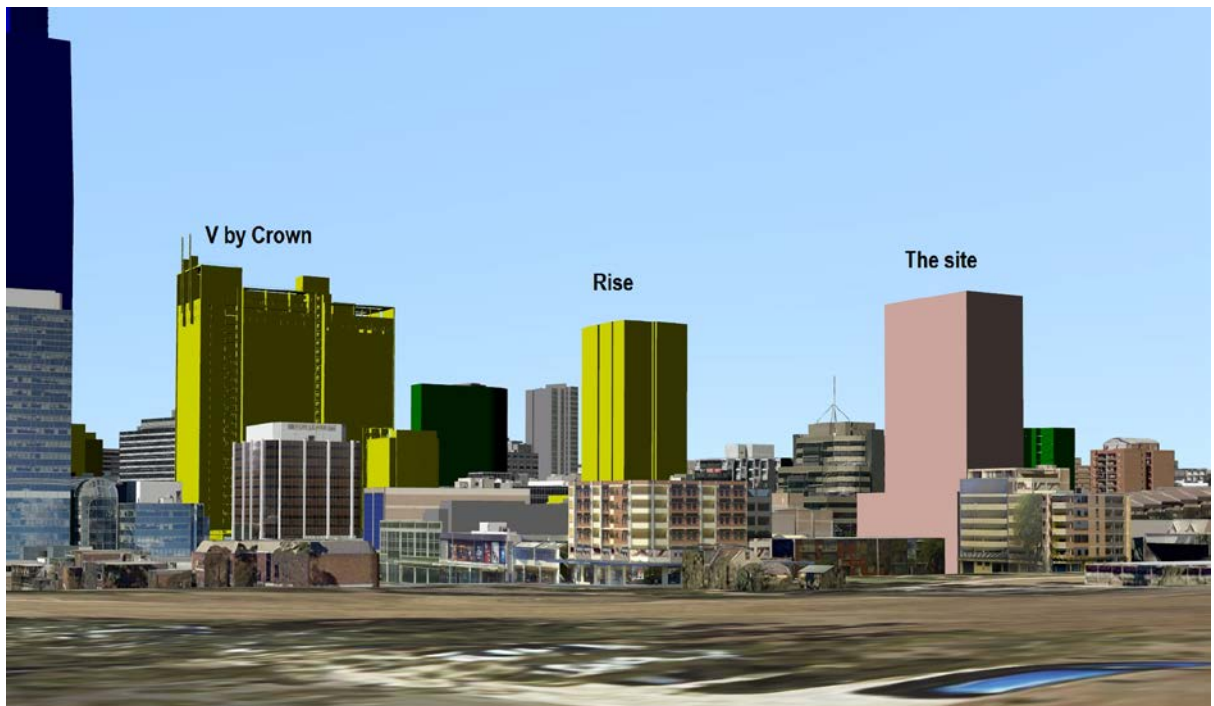


Figure 8 – Council's 3D Model demonstrating the site developed at 6.9:1 (as recommended as a suitable alternative in this report). Building shown in pink.

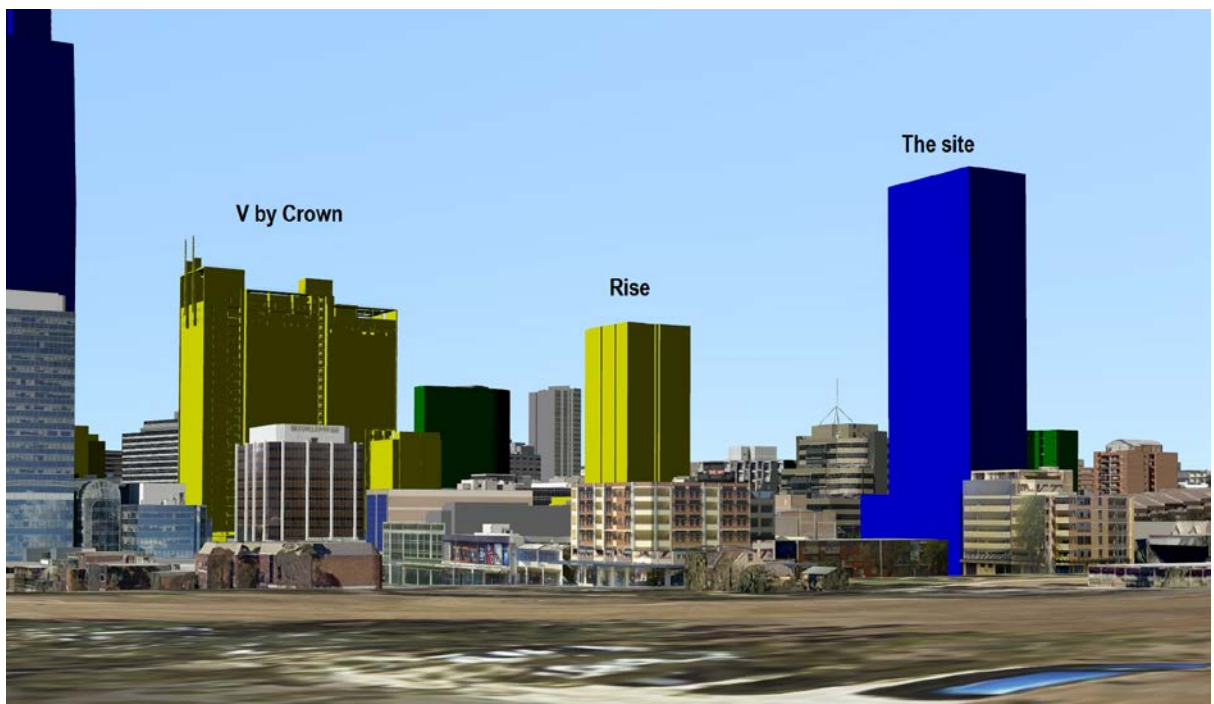


Figure 9 – Council's 3D Model demonstrating the site developed at 11.5:1 (as requested in the Planning Proposal). Building shown in blue.

45. Council's 3D Modelling is particularly useful as it factors in topography which can have a significant influence on the visual impact of a building. It should be noted in Figures 8 and 9 above, that buildings currently under construction are shown in yellow ("V by Crown" to the left of the image and "Rise" to the middle of the image). These buildings are 102m (29 storeys) and 82m (24 storeys)

respectively. When viewed from OGH, the subject site is more prominent due to the change in topography.

Alternative Recommended FSR for the site

46. The image shown in Figure 8 demonstrates a building with a height that is more compatible with the emerging cityscape and is far less visually obtrusive when viewed from OGH. This building reflects an FSR of 6.9:1 (base of 6:1 plus Design Excellence) and a height of 67m.
47. Currently the site is affected by an FSR of 4:1 and the proponent is seeking an increase to 10:1 (11.5:1 when including Design Excellence bonus). As an alternative, it is considered that an FSR of **6:1** may represent an increase in development potential for the site that is more appropriate for the following reasons:
 - a. An FSR of 6:1 (actually 6.9:1 when including Design Excellence) can be achieved on the site without needing to increase the height control in the LEP. Council's Urban Design team tested an FSR of 6.9:1 on the site which would result in a building with a height of approximately 64m to 67m (20 storeys).
 - b. This height is still within the existing height control of 80m. As such, there would be no need to increase the height control within the LEP. The Commonwealth government may look more favourably upon this approach as it is more in keeping with the controls agreed upon within the Conservation Agreement (being a maximum FSR of 6:1 plus 15% Design Excellence and a maximum Height of Buildings of 80m plus 15% Design Excellence).
 - c. An FSR of 6:1 would result in a building that is closer in height (and as such, more compatible) to the building adjoining at 11 Hunter Street which is currently under construction. This building under construction will be approximately 28m in height.
 - d. The visual analysis prepared by Council's Project Officer – Urban Design Modelling demonstrates that an FSR of 6:1 results in a building that is less visually obtrusive when viewed from OGH.
 - e. The shadow analysis submitted in the Planning Proposal demonstrates that a building with an FSR of 6:1 results in a far more acceptable degree of overshadowing for the existing buildings to the south on Argyle Street.
 - f. Should other land owners in the locality seek to replicate the increase in FSR for their sites, the cumulative impacts will be more acceptable.

Traffic and Transport

48. Council's Traffic and Transport team has provided comments and notes that there is a Traffic and Transport study being conducted as part of the CBD Planning Strategy. This Study includes traffic modelling of different growth scenarios factoring in various increases in the FSR. However, the Study does not factor in any increase in FSR for the subject site as it sits outside of the CBD Planning Strategy.
49. Further advice from Council's Traffic and Transport team has advised that the increase in traffic generation from the subject site is within the standard deviation of probable outcomes for the traffic modelling within the CBD. However, this assumption is made on the basis of this Planning Proposal in

isolation. Considering the receipt of a similar Planning Proposal for Nos. 18-22A Hunter Street and Nos. 23-29 Macquarie Street, there are cumulative traffic impacts to be considered arising from potential development within the Park Edge Special Area.

50. Council's Traffic and Transport team has advised that it is not appropriate to request the proponent to submit a Traffic and Transport Study for their site as it is less meaningful without the broader CBD included. Should Council resolve to endorse the Planning Proposal, the CBD Traffic and Transport Study would require amendment to the FSR assumptions underlying the traffic modelling.

Flood Impact

51. Council's Flood Consultant has reviewed the Planning Proposal and provides the following advice:

- *The site has only very minor flood inundation issues in the 100 year ARI flood event but very substantial flood issues in the (worst possible) PMF event;*
- *It is considered that the project satisfactorily addresses the matters listed in Ministerial Direction s117 Clause 4.3 'Flood Prone Land';*
- *Given the critical risk issues related to potential inundation of basement car parking we very much concur with the PCC requirement/expectation that all car parking be provided by way of above ground arrangements. In this regard it is noted that both the Planning Proposal and Urban Design Study reports (reference Sub-Sections 5.2 and 5.3 of this memo) include clear statements and preliminary drawings which indeed show that the proposal includes provision for above ground car parking;*
- *It is noted that the adoption of above ground car parking successfully eliminates the principal floodplain development risk associated with this site. Nonetheless as per one of Council's standard DA stage requirements, a report addressing all of Council's Local Floodplain Risk Management Policy requirements (including the controls listed in the accompanying Floodplain Matrix) should be submitted at that stage of the project;*
- *As detailed in our memos related to DA/863/2010, drainage issues at the rear of the site need to be considered and addressed as-necessary. These matters are relatively minor and therefore it is considered that they can be addressed at the DA stage of the project.*

Social Impact

52. Council's Social Outcomes team has reviewed the Planning Proposal and noted that the landowner stands to gain significant benefits from the proposed amendments and Council should consider value capture from the site for the purpose of public benefit. It is noted that Council has a preference for monetary contributions towards public domain improvements such as the River Strategy.
53. Should Council resolve to endorse the Planning Proposal, the above advice will inform the negotiations with the proponent and the result of such negotiations will be reported back to Council.

CONCLUSION

54. In summary, it is noted that not only is Parramatta Australia's Next Great City but it is also Australia's second oldest city. This is reflected in the World Heritage Listing of the Old Government House and Domain.
55. Development on the subject site has the potential to have a significant impact on the World and national heritage values of OGHD, unless kept under a significant impact threshold. As such, much work went into the Conservation Agreement with the Australian Department of Environment to devise controls within the Highly Sensitive Area adjacent to Parramatta Park.
56. Development on the subject site also has the potential to set a precedent for other developable sites in the Park Edge Special Area who may seek to replicate the controls and it is noted that a second Planning proposal has already been received in proximity to the site. The net effect of development in this area could result in significant cumulative visual impacts.
57. Council's 3D modelling has shown that the proposal would be visually prominent when viewed from OGHD and a reduced floor space ratio of 6:1 (6.9:1 including Design Excellence) would have a more acceptable degree of visual impact and would appear to be more in keeping with the emerging cityscape within the western edge of the CBD. A floor space ratio of 6:1 would also be able to be achieved without any need to increase the Height of Buildings control. This would be more consistent with the planning controls embedded in the Conservation Agreement.
58. It is recommended that Council endorse a modified version of the Planning Proposal which will remove the application of the sliding scale from this site so an FSR of 6:1 (as is currently shown on the Floor Space Ratio Map) will apply to the site in order to facilitate a development that is more appropriate within such close proximity of Old Government House and Domain.

NEXT STEPS

59. Council as the relevant planning authority must resolve to support a planning proposal before it can proceed to "Gateway" by the DP&E.
60. Should Council resolve to support the planning proposal:
 - a. The proponent will be requested to amend the Planning Proposal and the Urban Design Report as detailed in this Council report.
 - b. Council officers convert the Planning Proposal into the standard Planning Proposal template as required by the NSW Department of Planning and their document, *"A Guide to Preparing Planning Proposals"*.
 - c. The revised planning proposal and revised Urban Design Report and related documentation would be submitted to DP&E for Gateway determination prior to any formal exhibition being undertaken.
61. Further, Council officers will proceed with negotiations on a Voluntary Planning Agreement (VPA) with the applicant in relation to the planning proposal on the basis that any contribution in a VPA would be in addition to Section 94A

contributions payable for the development. The draft VPA would be ideally exhibited in conjunction with the planning proposal or soon thereafter.

CONSULTATION & TIMING

62. Should Council endorse the revised planning proposal, the planning proposal will be forwarded to the DP&E for the Gateway stage. Should the DP&E endorse the proposal, it is anticipated that it will be exhibited publicly for a period no less than 28 days.
63. The DP&E will determine the timeframe for the delivery of the planning proposal in its Gateway Determination.

Felicity Roberts

Project Officer Land Use Planning

ATTACHMENTS:

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|----------|--|-----------|
| 1 | Attachment 1 - Planning Proposal and Supporting Studies | 129 Pages |
| 2 | Attachment 2 - Additional Information submitted by the applicant | 3 Pages |

REFERENCE MATERIAL