

Attachment 5: Planning Proposal Request – Innova Capital (revised 18 January 2018) and supporting documentation

PLANNERS & PROJECT DIRECTORS



PLANNING PROPOSAL

12-14 PINDARI RD PEAKHURST HEIGHTS

Submitted to Georges River Council
on behalf of Learning Links

5 JUNE 2017

(revised 18 January 2018)

CAPITAL SYNDICATIONS PTY LTD
(T/A INNOVA CAPITAL)

PLANNING PROPOSAL

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EXECUTIVE SUMMARY

This planning proposal is submitted to Georges River Council to request and environmentally justify the rezoning of a special purpose Church site (zoned SP2) at 12-14 Pindari Rd Peakhurst Heights for local neighbourhood centre uses. The proposal is only for rezoning.

The planning proposal has been prepared by Capital Syndications Pty Ltd (t/a 'Innova Capital') on behalf of the proponents, being the Directors and Chief Executive Officer of Learning Links. The Learning Links brand is well known in the Georges River LGA for its community-based genesis 45 years ago and their focus on the prevention and minimisation of early childhood learning difficulties to limit or eliminate future disadvantage.

The structure and content of this document is consistent with the NSW Planning & Environment guideline dated July 2009 "A guide to preparing Planning Proposals" and has been prepared pursuant to section 55 of the Environmental Planning and Assessment Act (1979). The planning proposal seeks to address the need for the orderly reclassification of this uniquely zoned site into a use that is both commensurate with the surrounding land uses and its usage today. Despite its present zoning as SP2 'Church', the former church premises upon the two adjoining lots of land in the ownership of Learning Links has been operating as a private community-funded tuition centre and pre-school since the early 1990's pursuant to a historical use approval by Hurstville City Council. The growth of Learning Links since that time has occurred in parallel with the aging and evolving adaptation of the former church building which has become increasingly challenged in terms of its capacity and the cost-benefit feasibility of further modifications and repairs.

In looking to its future strategic development, the constraints of the existing building at Peakhurst Heights are an impediment to the ability for Learning Links to sustain and/or grow in this location without redevelopment of its adjoining sites. In exploring that potential under the prevailing zoning, Learning Links has identified the need to seek amendment of the Hurstville Local Environmental Plan (HLEP) 2012 to enable future redevelopment of its sites. In doing so, an accepted planning proposal will ultimately provide an enhanced community asset for the local precinct and LGA that will ensure retention and growth of existing employment, and better facilities for the tuition and care of local children and families that depend upon the Pindari Road centre.

Approval of this planning proposal from a broader environmental planning perspective provides certainty of employment retention by retaining lands presently applied in part for employment uses under a proposed zoning that is commensurate with the approved usage. It also will assist the mitigation of serious financial burden upon the proponent should they find it impractical to operate from the site in future, and have the double-negative of then being unable to find a buyer or tenant for the site because of its single restrictive approved zoning usage as that of a Church. In this context, we have previously briefed strategic planning representatives of Georges River Council on 20 September 2016 and 17 January 2017 and received in principle acknowledgement of the need and merit to pursue this planning proposal for the zoning nominated.

We therefore seek Council's careful, considered and meritorious recommendation to provide their support for this planning proposal and forward it to the Minister for Planning for a Gateway determination in accordance with section 56 of the EP&A Act.



1. INTRODUCTION

This planning proposal is submitted to Georges River Council to request and environmentally justify the rezoning of a special purpose (Church) site at 12-14 Pindari Road, Peakhurst Heights for local neighbourhood centre uses. It has been prepared by Capital Syndications Pty Ltd (t/a 'Innova Capital') on behalf of the proponents, being the Directors and Chief Executive Officer of Learning Links who are the owners of the site in consideration. It has been prepared in accordance with the NSW Planning & Environment guideline - 'A guide to preparing planning proposals' pursuant to section 55 of the Environmental Planning and Assessment Act (1979).



Learning Links (ABN 71 097 577 636) was established in 1972 by a group of parents concerned about the lack of appropriate education and support services at that time to meet the needs of their children. From a legal entity perspective, Learning Links ('LL') is a company limited by guarantee. Their focus is on preventing learning difficulties from causing contemporary and future disadvantage. LL works in collaboration with schools, early childhood settings and parents to help children with learning disabilities and difficulties. These include conditions such as ADHD, high functioning Autism, Dyslexia, Dyscalculia, fine and gross motor delays and speech and language delays. Early intervention for young children who experience developmental delays is critical to mitigate the risk of poor educational outcomes later in life. LL is recognised as a pioneer in the area of inclusive early childhood education through its 'inclusive preschool', where children of all abilities learn side by side. This model maximises the opportunity for all children to advance their learning ability and social/emotional wellbeing as they progress to primary school.

LL is therefore both a significantly valued community organisation within the Georges River LGA, and as demonstrated later in this planning proposal, is also a significant employer in the immediate local area, and in the local government area (LGA) as a whole.

This planning proposal is prepared in five parts and addresses the following specific matters in the guideline:

- Part 1 - A statement of the objectives and intended outcomes of the proposed instrument
- Part 2 - An explanation of the provisions that are to be included in the proposed instrument
- Part 3 - The justification for those objectives, outcomes and the process for their implementation
- Part 4 - Maps, where relevant, to identify the intent of the planning proposal and the area to which it applies
- Part 5 - Details of the community consultation that is to be undertaken on the planning proposal

The prevailing Local Environmental Plan is Hurstville Local Environmental Plan (HLEP) 2012. Accordingly, the intent of this planning proposal is to amend HLEP 2012 for the proposed zoning only. Unless expressly stated, the proponent otherwise accepts Council's existing development controls applicable to the proposed zoning so that development assessment is consistent with controls already in place for the nominated zone.



LL owns the two connected parcels of land at Pindari Road in Peakhurst Heights that are the subject of this planning proposal. The two parcels are Lots 58 and 59 in Deposited Plan 206906. The consolidation of both parcels measures some 1,170m² with no.12 being 580m² and no.14 being 590m². The land fronts the western side of Pindari Road, adjoins low density residential sites to the north and west and then public (Council) reserve land to the south.

The LL property appears to have the convenience benefit of formal pathway access to the south through the local Pindari Rd public reserve land, however such benefit is only informal and in no way a right appurtenant to the legal title of 14 Pindari Road. The Council Lot to the south is an irregular parcel of 1,153m² and is addressed as a battle-axe block off Acoonah Place Peakhurst Heights being no.5A. That property is registered as Lot 158 in Deposited Plan 210867. An aerial image of the two adjoining landholdings that comprise the LL site at Peakhurst Heights appears at Figure 1.

Figure 1 - Nearmap image of the subject sites (captured on 24 February 2016)

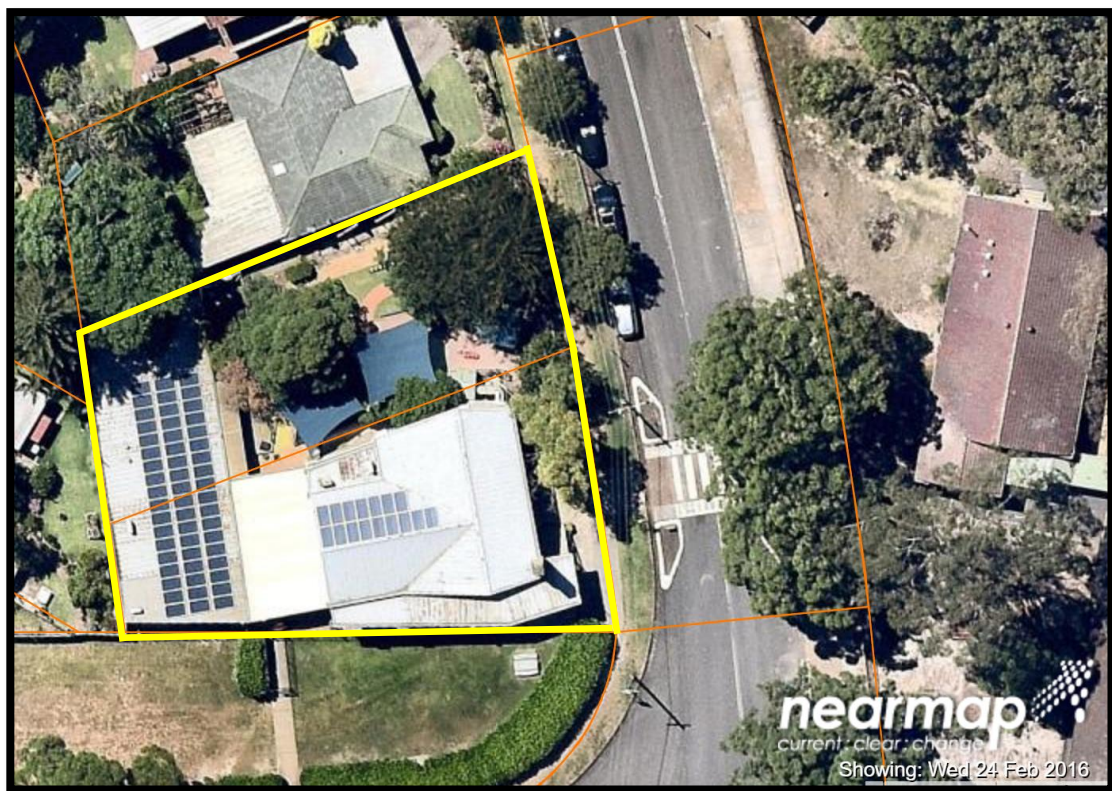


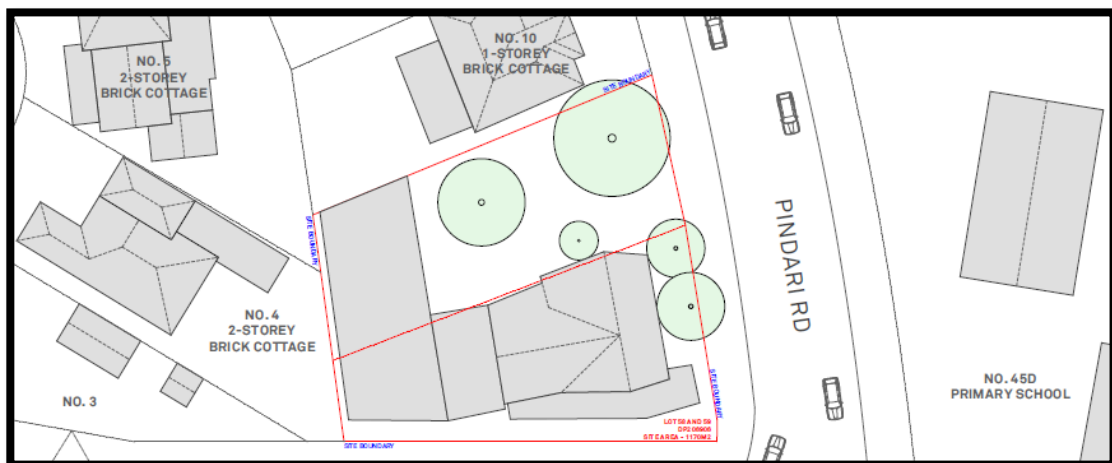
Figure 2 below provides six ground elevations of the existing property and the immediate context as described above

Figure 2 - The Learning Links site and ground elevations of the immediate context



Figure 3 provides a site plan of the Learning Links site and that of the residential sites that adjoin it. While the property does have five trees on-site, only two of these trees are considered significant in the context of any future development of the land, and it is appreciated that a Gateway determination may provide a s.117 direction for an assessment of both.

Figure 3 - Learning Links Site Plan of Existing Improvements and Vegetation



The aggregated LL site is essentially improved by:

- An elevated former church building with basement area that has been partitioned to create a combined administrative office, tuition rooms and storage space
- Two adjoined classrooms to the rear for pre-school usage
- Uncovered outdoor play and recreation areas
- Covered outdoor play and recreation areas
- The site also contains two significant trees located on the property at 12 Pindari Rd

PART 1 – OBJECTIVES AND INTENDED OUTCOMES

The zoning proposal is to change the existing zoning from that of SP2 'Church' to R2 'Low Density Residential' with special additional uses specified at Schedule 1 of HLEP2012. The proposal has strength because:

- (i) The proposed zoning is consistent with that of the adjoining properties and provides the transition between those and the adjacent neighbourhood centre in Pindari Road.
- (ii) Council has an objective to provide and sustain a strong inventory of employment land in neighbourhood centres within the LGA so as to meet the needs of a growing population base. LL are by far the largest private sector employer in Peakhurst Heights but working from a site that does not have an 'employment lands' zoning. It is not seeking an employment lands zoning, but its immediate proximity to these lands lends strong justification for the special additional uses sought.
- (iii) In addition to the standard permissive uses for the zone, it is proposed to amend Schedule 1 of HLEP2012 to add in 12-14 Pindari Road Peakhurst Heights having the additional permissive uses of office premises, restaurant or café being allowed. This is to enable the LL operation to broaden its offering in an interactive way and expand its income stream potential.
- (iv) Building heights of up to 9-metres are allowed under R2 zoning, and that height limit is in keeping with the surrounding environmental context.

The Draft Georges River Employment Lands Study ('ELS') dated 9 March 2017 was placed on public exhibition effective 1 May 2017 for 30 days. The ELS identifies various other attributes and other opportunities including that:

- The Georges River LGA is becoming increasingly more attractive as a location to live and work as Sydney's centre of population shifts westward; and
- The LGA is in an enviable position to provide for a knowledge-based workforce and attract a proportion of Sydney's knowledge economy.

A submission towards that study has been made on behalf of LL, a copy of which is provided at Appendix 1 of this planning proposal. While the zoning sought by this planning proposal is not an employment lands zone, the additional permitted uses proposed in Schedule 1 are on an employment nature, as is the operation of LL itself. Accordingly, despite the current and proposed zoning, it is considered that the site fulfills an important role in contributing to the local economy from an employment lands perspective.



PART 2 - EXPLANATION OF PROVISIONS

This section provides a simple explanation of the necessary amendments needed to the prevailing planning maps that apply to the subject site and are contained within HLEP 2012. Part 4 of this planning proposal addresses mapping in more detail.

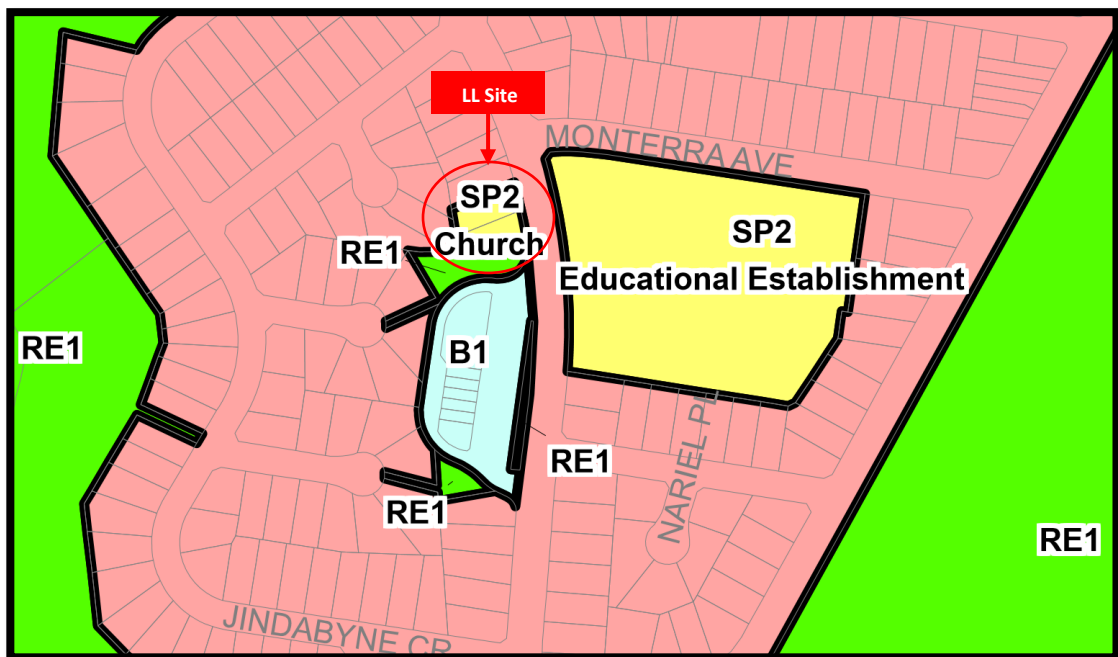
(a) Land to which the plan will apply

The planning proposal applies to land addressed as 12-14 Pindari Road, Peakhurst Heights 2210. The aggregate site comprises two parcels registered as Lots 58 and 59 in Deposited Plan 206906. The consolidation of both parcels measures some 1,170m² with no.12 being 580m² and no.14 being 590m².

(b) Land Use Zoning

The land is zoned pursuant to HLEP 2012 as a special purpose 'SP2' zone. The significance of this is that the usage of the land is therefore restricted to just the special purpose of the zoning label itself. In this case, the HLEP 2012 zoning map for 12-14 Pindari Road specifically identifies the LL site zoned as 'SP2 Church' as set out in Figure 1 below.

Figure 4 - Zoning map of the site and surrounding context sourced from HLEP 2012



The zoning objectives and permissive uses that attach to SP2 zoned sites are unique relative to other zones as the usage is generally singular based on the express special purpose of the zone. An SP2 zone usually reserves sites for development uses needed for public infrastructure purposes. In the case of the LL sites, they are zoned expressly for infrastructure use as a church regardless of religious denomination.

It is proposed that the zoning map contained in HLEP 2012 as extracted at Figure 4 amend the yellow SP2 'Church' zoning for these sites to the light red R2 'Low Density Residential' zoning, consistent with the adjoining properties to the north and west of these sites.

(c) Maximum Floor Space Ratio (FSR)

An FSR of 0.6:1 applies for R2 zoning in this area of Peakhurst Heights. A variation to the standard is sought for a 1:1 FSR to apply for both the Learning Links sites.

(d) Maximum Building Height

No changes are proposed to the standards already applying to the maximum height limit of 9.0m for R2 zoning.

This planning proposal is considered appropriate given the surrounding environmental context and the existing usage of the subject premises. The planning proposal impacts the relevant zoning map, height of buildings map, minimum lot size map and floor space ratio map, and will also require mention in Schedule 1 of HLEP2012 to allow additional permitted uses. These are discussed in more detail at Part 4 of this document.

It should also be noted that there are no heritage items on or within the vicinity of the site.



3. PART 3 - JUSTIFICATION

This section responds to the eleven specific questions provided by the NSW (Government) Planning & Environment 'A guide to preparing planning proposals'. The guideline was issued pursuant to s.55(3) of the Environmental Planning and Assessment Act 1979.

(i) Is the planning proposal a result of any strategic study or report?

This planning proposal provides a contribution to the employment lands objective of Georges River Council by seeking a rezoning for the sites in question that assures the existing permissive employment and community uses can endure with any redevelopment of the site.

The planning proposal emerges from both a proactive need to resolve the matter of the existing zoning of the site being misaligned with the permitted use, but also as an indirect response to the exhibited ELS of Georges River Council from 1 May 2017. The indirect trigger in the ELS is the complete lack of acknowledgement of the significant employment contribution that the activities of the LL operation makes to the local precinct and LGA as a whole from its premises at 12-14 Pindari Road, Peakhurst Heights. The lack of acknowledgement arises because the scope of the ELS was limited to sites of B1, B2 and IN2 zoning only. The ELS did not consider the potential for sites with alternative zonings that essentially function as 'employment land' under a pre-existing permissive use right or historical approval.

With the background of all that has been said above, this planning proposal arises because the existing zoning does not allow for the complete redevelopment of the site for the approved and community-accepted function it performs today. The planning proposal is therefore essential to the retention of the largest employer in Peakhurst Heights and would also assure the employment generation value of the site in perpetuity. Indeed, that ultimate outcome is aligned with the greater objective of the ELS.

The planning proposal will do nothing to increase pressure on the road and public transport system. Given the fractured nature of the existing zoning for a relatively small site, it provides an environmentally sensible solution for untenable and financially unviable special uses-zoned land in this location. In this context, we as representatives of the proponents have previously briefed Georges River Council and provide this submission on the strength of the in-principle support to pursue this planning proposal.

In light of what has been explained above, the planning proposal is in effect a 'paper-rezoning' only. The nature of the LEP amendment is thus minor, however, because it is a rezoning proposal, it is our understanding that this alone categorises the proposal as 'major'. Apart from the simple effect of an amendment to the zoning, height of buildings, minimum lot size and floor space ratio maps, the proposal has no complexity and is sufficiently unique in its location and existing usage that it will not give rise to an unwanted precedent for SP2 sites.



Turning now to the ELS, the study was first commissioned by the former Hurstville City Council who appointed JLL and its project team (Cox Architecture and SJB) on 23 September 2014 to undertake an Employment Lands Study within the former Hurstville LGA. The objective and aims of that study are to:

- Set a clear strategic direction for all employment lands [*as defined within the study*] within the Georges River Local Government Area;
- Review all recent employment and economic studies for the St George Region;
- Undertake an analysis of the supply and demand for commercial, retail and residential floor space in the Local Centres and Neighbourhood Centres of the former Hurstville LGA and industrial floor space in industrial areas of the Georges River LGA for the next 10 and 20 years;
- Provide advice on the potential to reach employment forecasts (utilising BTS estimates) of the employment lands within the former Hurstville LGA;
- Review the existing planning controls (LEP & DCP) for the subject employment lands and provide recommendations which may assist achieving the forecast employment numbers;
- Ensure sufficient employment land is retained across the whole Georges River LGA to accommodate existing and potential growth across a range of employment types.
- Provide recommendations for new planning controls to achieve the forecast dwelling and employment targets; and
- Investigate alternative opportunities for existing employment lands including revitalisation of these areas.

It has proceeded in two stages:

(i) Stage 1 - Background Report

(ii) Stage 2 - Industrial Lands Strategy and Commercial Lands Strategy

Of particular note is the scope of the study which has since been expanded to include the former Kogarah LGA following the proclamation to bring together both the former LGAs under the one governing body of Georges River Council on 12 May 2016. A future objective of the study is to expand its application so as to take in the Blakehurst and Kogarah Bay wards.

In terms of land application, the study is only concerned with land already zoned for employment purposes outside of the Hurstville CBD city centre and thus expressly excludes B3 and B4 zoned sites. This includes land zoned B1 'Neighbourhood Centre', B2 'Local Centre' and IN2 'Light Industrial' zoned land. The study however does not consider the suitability of LGA sites with alternative zonings that might otherwise be ideal for employment usage, or indeed that are presently being used for employment purposes under a historical use rights consent and/or previous zoning. As a consequence, the LL site is not expressly featured or mentioned in the ELS, and thus by implication, not within the inventory of the employment



lands and available floor space identified by the commissioned consultants for that study.

We would thus caution Council as to the completeness of that study, as the study has only embraced lands presently zoned for employment uses, and not brought into scope lands that are zoned for something else but carry an existing permissive employment use right. The LL site is one such example, and should be considered within scope. At the time of writing, LL employs 14 full-time staff and 60 part-time or casual staff that are located at the LL site in Peakhurst Heights. When measured in terms of a single full-time-equivalent (FTE) figure, the Peakhurst Heights site provides employment for 37.6 FTEs, making it by far the largest employer in the precinct, and one of the largest employers in the former Hurstville LGA.

LL also have a further 8 full-time staff and 109 part-time or casual staff at their other locations across Sydney, and are supported by a further 53 Volunteers. When measured in total for the whole operation, LL employs 66.3 FTEs. By deduction, 57% of its organisational-wide FTE labour force is therefore attached to the Peakhurst Heights site.

In light of the reality that some 74 people are employed at the Peakhurst Heights site in one way or another, it is difficult to accept any premise that the site not be rezoned to formalise the established employment purpose for which it has been used for the last 24 years. It is also worth noting that in 2016 alone, a total of 613 individual children were supported by staff and volunteers at the Pindari Road premises at Peakhurst Heights. These comprised 505 children attending private tuition sessions, and a further 107 attending the pre-school. Council should note that the centre at Peakhurst Heights also has a sizeable waiting list. The centre is thus well and truly operating at capacity. There is also an acute need to provide space for children with disabilities who are on that waiting list.

(ii) Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The existing zoning of the LL site necessitates the furnishing of this planning proposal in order to allow for a redevelopment of the site to achieve better functional efficiency outcomes for LL, substantially improved Workplace Health and Safety, and modern amenity for students, staff and parents that use or frequent the premises.

The approved existing use of land pre-dated the current Local Environmental Plan ('LEP') HLEP 2012. In the current HLEP, SP2 'Church' zoned land does not permit a community educational establishment. That therefore confers an existing use right upon both sites by virtue of the LL operation already being in place pursuant to its historical Council approval to operate. On its face, and subject to Council approval, LL could therefore rely on the existing usage if seeking to extend or renovate the existing premises further upon both these lots even though the zoning prohibits the usage. However, if a complete demolition and rebuild of premises is desired with the same usages in mind, then it is highly unlikely this would be approved as the usage is clearly prohibited as a fresh development. Furthermore, as LL are a community



funded organisation, their objective to invest in development that may provide future revenue sources such as shopfront revenue or a café is also stymied by the existing zoning.

One alternative way to potentially address the existing zoning challenge to achieve the objectives or intended outcomes is to leave the zoning as is and seek the endorsement of Council to seek additional permitted uses for 12-14 Pindari Road under clause 2.5 of HLEP 2012. With the concurrence of Georges River Council and the NSW State Government, this would see those addresses added to the list at schedule 1 of HLEP 2012 so that the unique right of usage is provisioned without prejudice to other sites with a similar zoning throughout the Georges River Local Government Area. The downside to this approach however is that the existing zoning is very difficult for financiers to value for the purposes of securitized financing. Another issue is that retention of the existing zoning does not necessarily future-proof the site from a further planning proposal in the years ahead. The proponent also notes that the process and duration to seek remedy under clause 2.5 is likely to take the same length of time as any rezoning would given that both approaches require an amendment to HLEP 2012 in one form or another.

Notwithstanding the comments above, it is appreciated that in the unlikely event of any future negative public reaction to the rezoning proposal, that the clause 2.5 approach would offer an alternative solution, albeit the less desirable longer-term environmental planning outcome for the site and its surrounding context. Nonetheless, it is clear that this alternative is not a better way of achieving the objectives of the proposal and desired outcomes.

With the potential future loss of LL in this location comes the loss of local jobs. In the neighbourhood suburbs of Peakhurst Heights and Lugarno combined, Learning Links is by far the largest employer. That would mean the loss of 14 full-time positions, 60 part-time casual positions, and the knock-on economic impact to a number of other indirect local businesses that presently service LL at Peakhurst Heights in one form or another.

(iii) Is the planning proposal consistent with the objectives and actions of applicable regional, sub-regional or district plan or strategy (including any exhibited draft plans or strategies) ?

The NSW Government's plans and strategies inform and guide local government planning and decision-making. In terms of the Georges River Council local government area, the draft Greater Sydney Region Plan, the Sydney Metropolitan Strategy, South Subregional Strategy and latest revised draft South District Plan are the key planning instruments that address future growth in Sydney and the Georges River local government area (LGA).

The draft *Greater Sydney Region Plan* (released October 2017) recognises the emerging evolution of a three-city structure for Sydney inclusive of the existing harbourside CBD, the Greater Parramatta CBD and the pending Aerotropolis-style city emerging around the future Western Sydney Airport. The plan sets a 40-year vision through to 2056 and describes 10 specific directions, within which 38 individual objectives are further stated. Based on a review of those directions, the planning proposal is relevant to two of those directions and some of their associated objectives. These are captured in the table below.

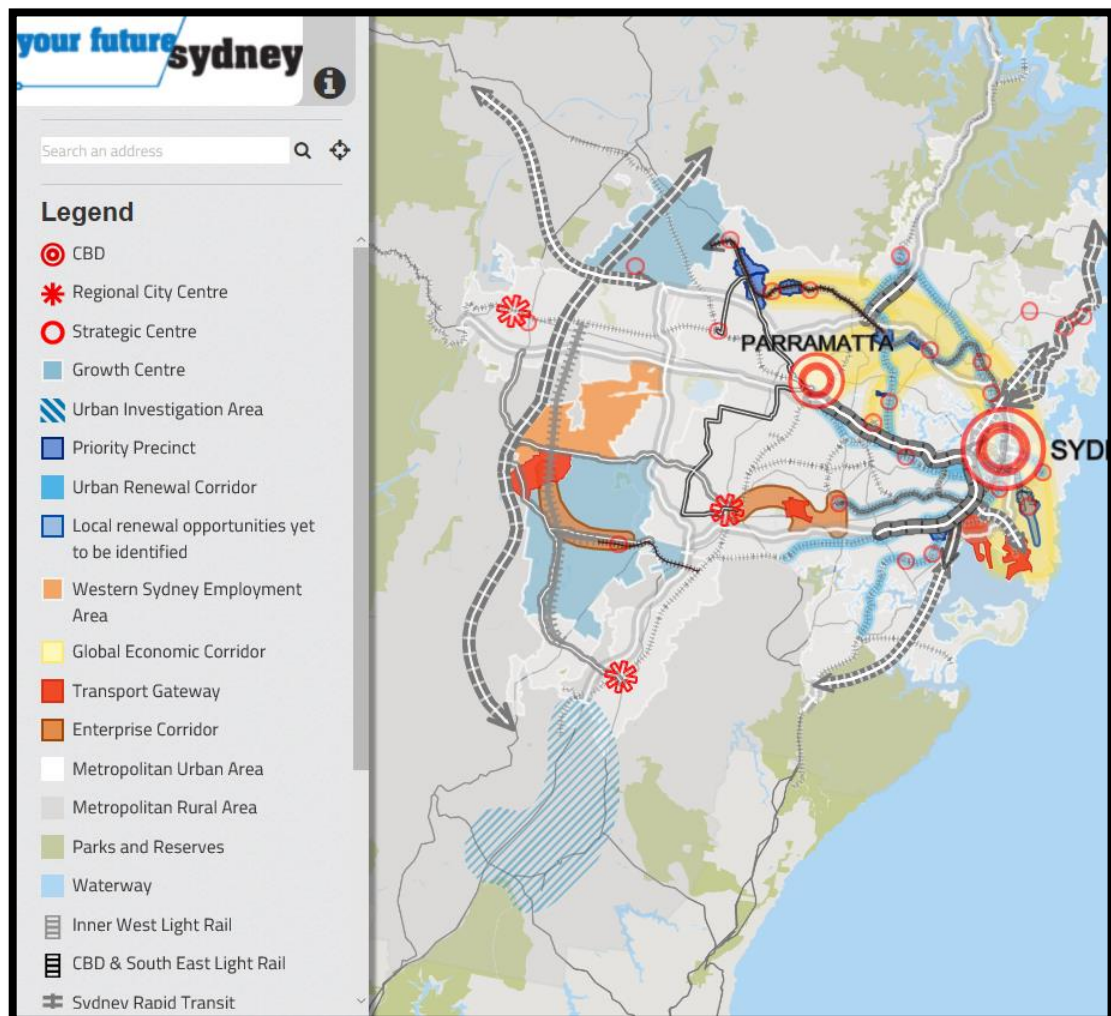


Direction	Objectives
Direction 3: A city for people (celebrating diversity and putting people at the heart of planning)	Objective 6: Services and infrastructure meet communities' changing needs. Objective 7: Communities are healthy, resilient and socially connected.
Direction 7: Jobs and skills for the city (creating the conditions for a stronger economy)	Objective 22: Investment and business activity in centres.

The plan also informs the latest revised draft of the South District Plan.

A Plan for Growing Sydney, released in December 2014, is the NSW Government's plan for the future of the Sydney Metropolitan Area through to 2034. The Plan provides key directions and actions to guide Sydney's productivity, environmental management, and liveability - including the delivery of housing, employment, infrastructure and open space. Figure 5 provides a geographic snapshot of the key hotspots within that plan.

Figure 5 - Hotspots within 'A Plan for Growing Sydney'



Source: NSW Planning & Environment Website

The map above identifies that Peakhurst Heights sits just marginally west of an urban investigation area (defined as the Sydney to Sutherland rail line), but is otherwise not located



within any corridor, transport hub, growth centre, regional centre or strategic centre. The land is also not within a state significant precinct.

At the time of writing, there are no other known draft State plans or other public exhibitions of instruments of relevance to this site. A new Draft NSW Metropolitan Strategy for Sydney 2031 was released in March 2013. The land falls within the greater Sydney Region, hence it does not form part of any other regional plan. It does however form part of the Draft South District Plan which is addressed later.

The strategic planning context for the consideration of this planning proposal therefore includes the:

- (i) Draft Greater Sydney Region Plan, October 2017
- (ii) Metropolitan Plan for Sydney 2036 (Metropolitan Plan) released by the State Government in December 2010 which seeks to concentrate new development around existing town centres and public transport service;
- (iii) Draft Metropolitan Strategy for Sydney released on 18 March 2013;
- (iv) Draft South Subregional Strategy exhibited between 24 December 2007 to 28 March 2008; and
- (v) Revised Draft South District Plan, October 2017

These NSW Government plans and strategies inform and guide government planning and decision-making. The Sydney Metropolitan Strategy and South Subregional Strategy are two key plans which address future growth in Sydney and Georges River LGA. The Strategy divides Sydney's Greater Metropolitan Region into ten subregions. The former Hurstville LGA which includes Pindari Road is part of the South Subregion. Hurstville was designated as a 'Major Centre' within the South Subregional Strategy. The draft South Subregional Strategy was released by the NSW Department of Planning in December 2007 and establishes the broad framework for the long-term development of the Region. This Subregional Strategy provides for a target of 3,000 additional jobs and 4,100 new dwellings to be accommodated in Hurstville by 2031.

Each of these plans are addressed as follows.

- **Draft Greater Sydney Region Plan, October 2017**

The Draft Greater Sydney Region Plan creates a metropolis of three cities, rebalancing growth and opportunities for people across greater Sydney. The plan contains 38 objectives. At its core, it is conceived from a vision where the people of Sydney (inclusive of greater Sydney) will all eventually live within 30 minutes of their jobs, education, health facilities, services and great places. Because the emphasis of the plan is on the tri-city model with a focus on infrastructure, livability, productivity and sustainability, the plan itself has no direct relevance to the planning proposal other than to reinforce the importance of the retention of LL in its neighbourhood employment precinct, particularly as it is the largest employer in that precinct.



- **Metropolitan Plan for Sydney 2036**

The Metropolitan Plan 2036 (MP) is the strategic plan that guides Sydney's growth to 2036. The Plan is an integrated long-term planning framework that will significantly manage Sydney's growth and strengthen its economic development to 2036, while enhancing its unique lifestyle, heritage and environment.

Regional Cities supply the region's high order services and support the business growth sectors providing jobs in Southern Sydney. Their role is critical, particularly in terms of the role they plan in offering employment opportunity closer to where people live, and thus less need to travel. The MP anticipates the former Hurstville local government area alone will provide an additional 41,000 dwellings and 3,000 jobs by 2,031.

- **Draft Metropolitan Strategy for Sydney 2031**

The draft strategy was released for public exhibition by the State Government on 18 March 2013 but details have not being worked out fully at LGA levels. Hurstville remains a major centre with a primary focus for additional office, retail, entertainment, cultural and public administration growth as well as higher intensity residential development. The aim is to provide capacity for at least 5,000 additional jobs by 2031. These targets were taken into account in the implementation of the new Comprehensive Local Environmental Plan and in developing Hurstville's other planning instruments to ensure well designed urban development.

The draft strategy highlights nine new areas of growth and development since the previous Plan (summarised above) was released in 2010, as well as areas predicted to grow between now and 2031. One of the key announcements was the introduction of nine new city shapers. According to the strategy, these areas present opportunities for "change and development that are critical for the growth of Sydney". The LL site is not included or identified as one of the city shapers, nor do any of the surrounding sites inclusive of the Pindari Road neighbourhood shops precinct. This therefore suggests the lands do not have a regional employment role to perform in this location, despite the reality that they already do when delivering children's educational support services in their local community.

- **South Subregional Strategy**

The metropolitan area is too large and complex to resolve all the planning aims and directions down to a detailed local level. Thus the MP sets the framework targets for 10 metropolitan subregions to provide for major growth in housing and employment in the subregion.

The south sub-regional planning strategy, released by the NSW Department of Planning in December 2007, covers the existing and former local government areas of Hurstville, Kogarah, Rockdale, Sutherland, Canterbury and Marrickville sets the broad direction for additional dwelling and employment growth. The target for the south subregion is 29,000 new jobs and 35,000 new dwellings between 2006 and 2036. The majority of jobs (comprising > 84% of the



subregions target) will be concentrated within the Hurstville and Kogarah town centres, and the specialised centre that is the airport.

Hurstville is designated as a 'major centre' within the South Subregional Strategy. The draft South Subregional Strategy established the broad framework for the long-term development of the Subregion with specific targets for major centres. This strategy provides for a target of 3,000 additional jobs in Hurstville and 42,000 new dwellings to be accommodated in the Southern Sub Region by 2031.

- **Draft South District Plan**

The Greater Sydney Commission recently placed on public exhibition the first ever 20 year draft District Plans, one for each of Greater Sydney's six Districts. This was subsequently revised to five districts following the revision to the draft Greater Sydney Region Plan in October 2017.

The goal of these Plans is to have well-coordinated, integrated and effective planning for land use, transport and infrastructure. They are intended to be the link between the State Government's draft Greater Sydney Region Plan – *A Plan for Growing Sydney* – and the Local Environmental Plans of each Council.

The draft District Plans set out the opportunities, priorities and actions and provide the means by which the draft Greater Sydney Region Plan and *A Plan for Growing Sydney* can be put into action at a local level.

The most recent revised draft District Plan (October 2017) sets out aspirations and proposals for Greater Sydney's South District, which includes the local government areas of Canterbury-Bankstown, Georges River and Sutherland. It has been developed by the Greater Sydney Commission.

Amongst the eighteen overarching priorities contained within that revised plan, four of those are supported by the planning proposal. These include:

- (i) Planning Priority S3:
Providing services and social infrastructure to meet people's changing needs
- (ii) Planning Priority S4:
Fostering healthy, creative, culturally rich and socially connected communities
- (iii) Planning Priority S6:
Creating and renewing great places and local centres, and respecting the District's heritage
- (iv) Planning Priority S8:
Growing and investing in health and education precincts and Bankstown Airport trade gateway as economic catalysts for the District

The South District's local and district centres provide a diverse range of predominantly population-serving economic activities and are important to the prosperity and liveability of



the District. The adjacent Peakhurst Heights Neighbourhood Centre is a local centre and draws the majority of its trade from the local area population. It forms a part of the greater Hurstville District Centre. The particular characteristics and value add of these centres informs the preparation of appropriate planning controls to protect, support and enhance the economic functions of these areas. This is also the approach that was taken to inform the planning proposal given the land use intentions under the zoning proposal.

Councils are required to give effect to District Plans as soon as practicable after a District Plan is made, and draft District Plans are intended to guide the preparation of planning proposals under Part 3 of the Act. This is established by the Department of Planning and Environment's *Guide to Preparing Planning Proposals* (August 2016).

The revised draft South District Plan outlines the proposed priorities and actions to drive the South District's productive economy. It draws on *A Plan for Growing Sydney's* Goal 1, which seeks to grow a competitive economy with world-class services and transport, as well as the priorities from *Our vision – Towards our Greater Sydney 2056*. Between 1996 and 2016, the highest jobs growth occurred in the health and education sector (73%), followed by knowledge-intensive jobs (32%) and population-serving jobs (24%). Industrial employment declined by nearly 17%. It is important to note that Learning Links has also had significant growth in recent years and forms a valued part of the local health and education sector, and thus the local economy.

The plan points to the potential of the health and education sector to play a significant economic role in the South District's future. Employment and urban services areas across the District demonstrate high labour productivity and this expressly includes Peakhurst. Employment and urban service lands play a critical role in the efficient and effective function of the District. The plan acknowledges the comparative scarcity of this resource, and identifies that a holistic and precautionary approach to their planning should be undertaken. The aims of the planning proposal are intended to assure the existing health and education employment focus of the site in question for many years to come.

Further to all that has been discussed above, there are otherwise no significant Commonwealth or State interests in the planning proposal other than those that in general support the initiative to encourage a more appropriate planning and development outcome on the site consistent with the State's regional and subregional strategic planning framework described above.

(iv) Is the planning proposal consistent with the Georges River Council local strategy or other local strategic plan?

It is inevitable that the recent amalgamation of Hurstville City Council and Kogarah Council will see the publication of a new strategic plan for the Georges River Council LGA in the near future. Until then, the Hurstville Community Strategic Plan 2025 ('HCSP 2025') continues to be the prevailing instrument applicable to the Pindari Road site. Hurstville City Council adopted the Community Strategic Plan 2025 and the Delivery Program 2015-19 at its meeting on 3 June



2015 and they came into effect from 1 July 2015. The document references the Employment Lands Study which is further addressed at section 2 of this Addendum. There are no other references in the Community Strategic Plan that are of any direct or indirect relevance to the planning proposal not otherwise covered by the more detailed Employment Lands Strategy.

Finally, this planning proposal does not arise due to a change in circumstances, such as change triggered by investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls. The proposal arises purely because the existing land use is inconsistent with the existing zoning which thus inhibits full redevelopment of the site. The desired zoning is considered to be the one of best fit given the surrounding environmental context and the opportunity under that zoning to tie in the existing function of Learning Links with a broader experience offering that may include a café and retail premises or similar.

The retention and sustainment of LL in the local community is clearly important to the on-going social and cultural growth of the Hurstville area. Other than this aspect of the plan, there are no direct impacts either way from this planning proposal upon the HCSP 2025. There is however a very relevant document that Council has recently placed on public exhibition for community comment, namely the Draft Georges River Employment Lands Study dated 9 March 2017.

In direct response to that study, a submission has been provided to Georges River Council in concert with the lodgment of this planning proposal. A copy of that submission is included at Appendix 1. The submission asserts the overlooked significance of LL as a precinct employer and as a significant contributor to the LGA in both a social and economic context. Section 13 of Stage 2 of the ELS: Industrial and Commercial Lands Strategy of Georges River Council sets out suggested opportunities for B1 Neighbourhood centres. In particular, it identifies at section 13.2.1 that an increase in permissible height from 9.0 metres to 12.0 metres should be considered in order to better enable the current FSR of 1.5:1 for this zone to be realisable. The report also identifies that this recommendation be considered in conjunction with shops being permitted within the B1 zone. This follows from the discussion at paragraph 7.5.1 of the ELS Background Report that there may be opportunity to expand the permissive uses under B1 'neighbourhood centre' zonings to include shops (inclusive of a supermarket), although in the case of this particular site, the landholding is considered too small, fractured and incapable of providing the necessary car parking for a viable business case to support a supermarket.

The proponent has no objection to the recommended enhancements to the B1 zone for both height and permitted uses. Given the proponents express objective in preparing this planning proposal, it is considered that both the opportunities identified for permissible uses as discussed above would only be of further benefit to the proponents objectives to redevelop their site for a sustainable long term future as this also gives them the flexibility to develop their site more effectively to maximise open space footprints for the benefit of children that use the site, and provides more opportunity to create a space or spaces that may also provide them with future income streams and theming opportunities (eg, a dedicated learning centre shop with educational product, learning-centre café etc).



(v) Is the planning proposal consistent with applicable State Environmental Planning Policies?

State Environmental Planning Policies (SEPPs) deal with matters of State or regional environmental planning significance. A thorough review of the prevailing list of non-repealed SEPPs has been conducted as demonstrated below. We have determined that there are no applicable SEPPs for this planning proposal.

This list is ordered numerically for numbered SEPPs and by date of publication for un-numbered SEPPs, with the most recent policies appearing at the start of the list.

1: *State Environmental Planning Policy (State and Regional Development) 2011*

The aims of this Policy are to identify development that is State significant development or State significant infrastructure and critical State significant infrastructure and to confer functions on joint regional planning panels to determine development applications.

Conclusion: The SEPP is not applicable for this proposal. The LL site is not state significant.

2: *State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011*

The aims of this Policy are to provide for healthy water catchments that will deliver high quality water while permitting development that is compatible with that goal. The Policy provides that a consent authority must not grant consent to a proposed development unless it is satisfied that the proposed development will have a neutral or beneficial effect on water quality. The Policy also aims to support the maintenance or achievement of the water quality objectives for the Sydney drinking water catchment.

Conclusion: The SEPP is not applicable for this rezoning proposal.

3: *State Environmental Planning Policy (Urban Renewal) 2010*

The aims of this Policy are to establish the process for assessing and identifying sites as urban renewal precincts, to facilitate the orderly and economic development and redevelopment of sites in and around urban renewal precincts, and to facilitate delivery of the objectives of any applicable government State, regional or metropolitan strategies connected with the renewal of urban areas that are accessible by public transport.

Conclusion: The SEPP is not applicable for this proposal. The LL sites are not part of an urban renewal precinct.

4: *State Environmental Planning Policy (Affordable Rental Housing) 2009*

Establishes a consistent planning regime for the provision of affordable rental housing. The policy provides incentives for new affordable rental housing, facilitates the retention of existing affordable rentals, and expands the role of not-for-profit providers. It also aims to support local centres by providing housing for workers close to places of work, and facilitate development of housing for the homeless and other disadvantaged people.

Conclusion: The SEPP is not applicable for this proposal. There is no objective to provide affordable rental housing as part of this proposal.

5: *State Environmental Planning Policy (Western Sydney Parklands) 2009*



The aim of the policy is to put in place planning controls that will enable the Western Sydney Parklands Trust to develop the Western Parklands into multi-use urban parkland for the region of western Sydney.

Conclusion: The SEPP is not applicable for this proposal. The LL sites are not Western Sydney Parklands.

6: *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*

Streamlines assessment processes for development that complies with specified development standards. The policy provides exempt and complying development codes that have State-wide application, identifying, in the General Exempt Development Code, types of development that are of minimal environmental impact that may be carried out without the need for development consent; and, in the General Housing Code, types of complying development that may be carried out in accordance with a complying development certificate as defined in the Environmental Planning and Assessment Act 1979.

Conclusion: The SEPP is not applicable for this proposal. The proposal is not concerned with exempt and complying development.

7: *State Environmental Planning Policy (Western Sydney Employment Area) 2009*

Promotes economic development and the creation of employment in the Western Sydney Employment Area by providing for development, including major warehousing, distribution, freight transport, industrial, high technology and research facilities. The policy provides for coordinated planning, development and rezoning of land for employment or environmental conservation purposes.

Conclusion: The SEPP is not applicable for this proposal. The site is not within the western Sydney employment area.

8: *State Environmental Planning Policy (Rural Lands) 2008*

The aim of this policy is to facilitate the orderly and economic use and development of rural lands for rural and related purposes. The policy applies to local government areas that are not listed in clause 4.

Conclusion: The SEPP is not applicable for this proposal. The LL sites are not Rural Lands.

9: *State Environmental Planning Policy (Kosciuszko National Park - Alpine Resorts) 2007*

The aim of this policy is to strengthen the assessment framework for development within the alpine resorts and to reinforce environmentally sustainable development and recreational activities within these resorts. The Policy also facilitates the protection of the natural and cultural setting of the alpine resorts in Kosciuszko National Park.

Conclusion: The SEPP is not applicable for this proposal. The LL sites are not Alpine Resort land.

10: *State Environmental Planning Policy (Infrastructure) 2007*

Provides a consistent planning regime for infrastructure and the provision of services across NSW, along with providing for consultation with relevant public authorities during the assessment process. The SEPP supports greater flexibility in the location of



infrastructure and service facilities along with improved regulatory certainty and efficiency. More details about the SEPP, including a guide, are available [here](#).

Conclusion: The SEPP is not applicable for this proposal. It is not concerned with infrastructure.

11: *State Environmental Planning Policy (Miscellaneous Consent Provisions) 2007*

Provides for the erection of temporary structures and the use of places of public entertainment while protecting public safety and local amenity. Note: This SEPP was formerly known as SEPP (Temporary Structures and Places of Public Entertainment) 2007 and SEPP (Temporary Structures) 2007.

Conclusion: The SEPP is not applicable for this proposal. It is not concerned with the need to establish temporary structures.

12: *State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007*

This Policy aims to provide for the proper management and development of mineral, petroleum and extractive material resources for the social and economic welfare of the State. The Policy establishes appropriate planning controls to encourage ecologically sustainable development.

Conclusion: The SEPP is not applicable for this proposal. The sites are within an urban area.

13: *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*

Provides for the coordinated release of land for residential, employment and other urban development in the North West and South West growth centres of the Sydney Region (in conjunction with Environmental Planning and Assessment Regulation relating to precinct planning).

Conclusion: The SEPP is not applicable for this proposal. It is not located in either of the two growth centres of Sydney.

14: *State Environmental Planning Policy (State Significant Precincts) 2005*

Defines certain developments that are major projects to be assessed under Part 3A of the Environmental Planning and Assessment Act 1979 and determined by the Minister for Planning. It also provides planning provisions for State significant sites. In addition, the SEPP identifies the council consent authority functions that may be carried out by joint regional planning panels (JRPPs) and classes of regional development to be determined by JRPPs. Note: this SEPP was formerly known as State Environmental Planning Policy (Major Projects) 2005.

Conclusion: The SEPP is not applicable for this proposal. It is not located within a state significant precinct.

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

This SEPP operates in conjunction with Environmental Planning and Assessment Amendment (Building Sustainability Index: BASIX) Regulation 2004 to ensure the effective introduction of BASIX in NSW. The SEPP ensures consistency in the implementation of BASIX throughout the State by overriding competing provisions in other environmental planning instruments and development control plans, and



specifying that SEPP 1 does not apply in relation to any development standard arising under BASIX. The draft SEPP was exhibited together with draft Regulation amendment in 2004.

Conclusion: The SEPP is not applicable for this proposal. This is a rezoning only.

16: *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004*

Encourage the development of high quality accommodation for our ageing population and for people who have disabilities - housing that is in keeping with the local neighbourhood. Note the name of this policy was changed from SEPP (Seniors Living) 2004 to SEPP (Housing for Seniors or People with a Disability) 2004 effective 12.10.07.

Conclusion: The SEPP is not applicable for this proposal. It is not concerned with seniors living or disability housing.

17: *State Environmental Planning Policy No 71 - Coastal Protection*

The policy has been made under the Environmental Planning and Assessment Act 1979 to ensure that development in the NSW coastal zone is appropriate and suitably located, to ensure that there is a consistent and strategic approach to coastal planning and management and to ensure there is a clear development assessment framework for the coastal zone.

Conclusion: The SEPP is not applicable for this proposal. The site is not located in a coastal area.

18: *State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development*

Raises the design quality of residential apartment development across the state through the application of a series of design principles. Provides for the establishment of Design Review Panels to provide independent expert advice to councils on the merit of residential apartment development. The accompanying regulation requires the involvement of a qualified designer throughout the design, approval and construction stages.

Conclusion: The SEPP is not applicable for this proposal. It is not concerned with the construction of residential apartments.

19: *State Environmental Planning Policy No 70 - Affordable Housing (Revised Schemes)*

Extends the life of affordable housing provisions relating to: Sydney Regional Environmental Plan No. 26 - City West, Willoughby Local Environmental Plan 1995, South Sydney Local Environmental Plan 1998. Schemes such as these are helping to provide affordable housing in areas undergoing significant redevelopment.

Conclusion: The SEPP is not applicable for this proposal. It is not concerned with the provision of affordable housing.

20: *State Environmental Planning Policy No 64 - Advertising and Signage*

Aims to ensure that outdoor advertising is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations and is of high quality design and finish. The SEPP was amended in August 2007 to



permit and regulate outdoor advertising in transport corridors (e.g. freeways, tollways and rail corridors). The amended SEPP also aims to ensure that public benefits may be derived from advertising along and adjacent to transport corridors. Transport Corridor Outdoor Advertising and Signage Guidelines (DOP July 2007) provides information on design criteria, road safety and public benefit requirements for SEPP 64 development applications

Conclusion: The SEPP is not applicable for this proposal. It is for a rezoning only.

21: *State Environmental Planning Policy No 62 - Sustainable Aquaculture*

Encourages the sustainable expansion of the industry in NSW. The policy implements the regional strategies already developed by creating a simple approach to identify and categorise aquaculture development on the basis of its potential environmental impact. The SEPP also identifies aquaculture development as a designated development only where there are potential environmental risks.

Conclusion: The SEPP is not applicable for this proposal. It is not concerned with Aquaculture.

22: *State Environmental Planning Policy No 55 - Remediation of Land*

Introduces state-wide planning controls for the remediation of contaminated land. The policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated. If the land is unsuitable, remediation must take place before the land is developed. The policy makes remediation permissible across the State, defines when consent is required, requires all remediation to comply with standards, ensures land is investigated if contamination is suspected, and requires councils to be notified of all remediation proposals. To assist councils and developers, the Department, in conjunction with the Environment Protection Authority, has prepared Managing Land Contamination: Planning Guidelines.

Conclusion: The SEPP is not applicable for this proposal. The land has had long-term use as a church and as a childrens education facility.

23: *State Environmental Planning Policy No 52 - Farm Dams and Other Works in Land and Water Management Plan Areas*

The Policy provides the thresholds to determine when consent is, or is not required for farm dams. The SEPP considers significant dams designated development. The policy also enables irrigation corporations to carry out maintenance and emergency works without development consent.

Conclusion: The SEPP is not applicable for this proposal. It is not a farm.

24: *State Environmental Planning Policy No 50 - Canal Estate Development*

Bans new canal estates from the date of gazettal, to ensure coastal and aquatic environments are not affected by these developments

Conclusion: The SEPP is not applicable for this proposal. It is not located near a canal or aquatic environment.

25: *State Environmental Planning Policy No 47 - Moore Park Showground*



Enables the redevelopment of the Moore Park Showground for film and television studios and film-related entertainment facilities in a manner that is consistent with the Showground's status as an area important to the State and for regional planning.

Conclusion: The SEPP is not applicable for this proposal. It is not within the Moore Park Showground area.

26: *State Environmental Planning Policy No 44 - Koala Habitat Protection*

Encourages the conservation and management of natural vegetation areas that provide habitat for koalas to ensure permanent free-living populations will be maintained over their present range. The policy applies to 107 local government areas. Councils cannot approve development in an area affected by the policy without an investigation of core koala habitat. The policy provides the state-wide approach needed to enable appropriate development to continue, while ensuring there is ongoing protection of koalas and their habitat.

Conclusion: The SEPP is not applicable for this proposal. The site does not provide habitat for Koala's.

27: *State Environmental Planning Policy No 36 - Manufactured Home Estates*

Helps establish well-designed and properly serviced manufactured home estates (MHEs) in suitable locations. Affordability and security of tenure for residents are important aspects. The policy applies to Gosford, Wyong and all local government areas outside the Sydney Region. To enable the immediate development of estates, the policy allows MHEs to be located on certain land where caravan parks are permitted. There are however, criteria that a proposal must satisfy before the council can approve development. The policy also permits, with consent, the subdivision of estates either by community title or by leases of up to 20 years. A section 117 direction issued in conjunction with the policy guides councils in preparing local environmental plans for MHEs, enabling them to be excluded from the policy.

Conclusion: The SEPP is not applicable for this proposal. The site is within the Sydney Region.

28: *State Environmental Planning Policy No 21 - Caravan Parks*

Ensures that where caravan parks or camping grounds are permitted under an environmental planning instrument, movable dwellings, as defined in the Local Government Act 1993, are also permitted. The specific kinds of movable dwellings allowed under the Local Government Act in caravan parks and camping grounds are subject to the provisions of the Caravan Parks Regulation. The policy ensures that development consent is required for new caravan parks and camping grounds and for additional long-term sites in existing caravan parks. It also enables, with the council's consent, long-term sites in caravan parks to be subdivided by leases of up to 20 years.

Conclusion: The SEPP is not applicable for this proposal. It is not a caravan park, nor is it zoned for that usage.

29: *State Environmental Planning Policy No 33 - Hazardous and Offensive Development*

Provides definitions for 'hazardous industry', 'hazardous storage establishment', 'offensive industry' and 'offensive storage establishment'. The definitions apply to all planning instruments, existing and future. The new definitions enable decisions to



approve or refuse a development to be based on the merit of proposal. The consent authority must carefully consider the specifics of the case, the location and the way in which the proposed activity is to be carried out. The policy also requires specified matters to be considered for proposals that are 'potentially hazardous' or 'potentially offensive' as defined in the policy. For example, any application to carry out a potentially hazardous or potentially offensive development is to be advertised for public comment, and applications to carry out potentially hazardous development must be supported by a preliminary hazard analysis (PHA). The policy does not change the role of councils as consent authorities, land zoning, or the designated development provisions of the Environmental Planning and Assessment Act 1979.

Conclusion: The SEPP is not applicable for this proposal. No hazardous or offensive development is proposed.

30: *State Environmental Planning Policy No 30 - Intensive Agriculture*

Requires development consent for cattle feedlots having a capacity of 50 or more cattle or piggeries having a capacity of 200 or more pigs. The policy sets out information and public notification requirements to ensure there are effective planning controls over this export-driven rural industry. The policy does not alter if, and where, such development is permitted, or the functions of the consent authority.

Conclusion: The SEPP is not applicable for this proposal. The site is within an established urban area.

31: *State Environmental Planning Policy (Kurnell Peninsula) 1989*

The general aims and objectives of this Policy are to conserve the natural environment of the Kurnell Peninsula and ensure that development is managed having regard to the environmental, cultural and economic significance of the area to the nation, State, region and locality. To apply environmental performance criteria which will ensure that the environment is not adversely affected by development. To promote, encourage and facilitate opportunities for commercial, industrial and tourist development consistent with the conservation of the unique ecological and landscape attributes of the Kurnell Peninsula. To ensure that development is co-ordinated to allow the economic and efficient provision of public services and amenities having regard to the environment. To promote the sharing of responsibility for environmental planning on the Kurnell Peninsula between the Council, the Department of Planning, the Department of Environment, Climate Change and Water, the Department of Industry and Investment and Sydney Water Corporation. To protect, enhance and utilise the tourism, leisure and recreation potential of the Kurnell Peninsula so far as it is consistent with the conservation of its ecological and heritage value.

Conclusion: The SEPP is not applicable for this proposal. It is not located within the Kurnell peninsula.

32: *State Environmental Planning Policy No 26 - Littoral Rainforests*

Protects littoral rainforests, a distinct type of rainforest well suited to harsh salt-laden and drying coastal winds. The policy requires that the likely effects of proposed development be thoroughly considered in an environmental impact statement. The policy applies to 'core' areas of littoral rainforest as well as a 100 metre wide 'buffer' area surrounding these core areas, except for residential land and areas to which SEPP No. 14 - Coastal Wetlands applies. Eighteen local government areas with direct



frontage to the Pacific Ocean are affected, from Tweed in the north to Eurobodalla in the south.

Conclusion: The SEPP is not applicable for this proposal. The site is within an established urban area.

33: *State Environmental Planning Policy (Penrith Lakes Scheme) 1989*

The aims and objectives of this Policy are to permit the implementation of the Penrith Lakes Scheme. In particular the Policy aims to provide a development control process establishing environmental and technical matters which must be taken into account in implementing the Penrith Lakes Scheme in order to protect the environment, to identify and protect items of the environmental heritage, to identify land which may be rezoned for urban purposes, and to permit interim development in order to prevent the sterilization of land to which this Policy applies during implementation of the Penrith Lakes Scheme.

Conclusion: The SEPP is not applicable for this proposal. The site is located at Peakhurst Heights.

34: *State Environmental Planning Policy No 19 - Bushland in Urban Areas*

Protects and preserves bushland within certain urban areas, as part of the natural heritage or for recreational, educational and scientific purposes. The policy is designed to protect bushland in public open space zones and reservations, and to ensure that bush preservation is given a high priority when local environmental plans for urban development are prepared.

Conclusion: The SEPP is not applicable for this proposal. The site is already developed, and other than two trees, it does not contain urban bushland, nor does it adjoin urban bushland.

35: *State Environmental Planning Policy No 14 - Coastal Wetlands*

Ensures coastal wetlands are preserved and protected for environmental and economic reasons. The policy applies to local government areas outside the Sydney metropolitan area that front the Pacific Ocean. The policy identifies over 1300 wetlands of high natural value from Tweed Heads to Broken Bay and from Wollongong to Cape Howe. Land clearing, levee construction, drainage work or filling may only be carried out within these wetlands with the consent of the council and the agreement of the Secretary of the Department of Planning and Environment. Such development also requires an environmental impact statement to be lodged with a development application. The policy is continually reviewed. It has, for example, been amended to omit or include areas, clarify the definition of the land to which the policy applies and to allow minimal clearing along boundaries for fencing and surveying.

Conclusion: The SEPP is not applicable for this proposal. The site is not coastal.

36: *State Environmental Planning Policy No 1 - Development Standards*

Makes development standards more flexible. It allows councils to approve a development proposal that does not comply with a set standard where this can be shown to be unreasonable or unnecessary.



Conclusion: This is a rezoning proposal only to move from a mono-use zone to a multi-use zone, hence the SEPP is not applicable in this instance.

(vi) Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?

This planning proposal is issued to seek Council endorsement for further submission to NSW Planning & Environment for a Gateway determination. Accordingly, until such time as that occurs, it is not known what further specific directions under s.117(2) of the Environmental Planning and Assessment Act 1979 may arise over and above the standard requirements for the preparation of a planning proposal.

(vii) Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

As explained earlier in this proposal, the site in question has had an existing long term use as a learning centre and pre-school for 24 years and was previously used as a church. The site is fully developed and contains two mature trees. It is located in an urban setting and the trees are not part of a connected vegetation corridor. There is no likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats will be adversely affected as a result of this proposal.

(viii) Are there any other environmental effects as a result of the planning proposal and how are they proposed to be managed?

The approved existing use of land pre-dated HLEP 2012. The site has an existing use right upon both sites by virtue of the LL operation already being in place pursuant to its historical Council approval to operate.

On its face, LL could therefore rely on the existing usage if seeking to extend or renovate the existing premises further upon both these Lots under a standard development application, even though the zoning does not specify the current usage. Under this scenario, a future compliant development application for alterations and/or additions is likely to be successful. However, if a complete demolition and rebuild of premises is desired with the same usages in mind, then this could not be approved as the usage is clearly prohibited as a fresh development. It is therefore considered that any question regarding any future development application scenario under the proposed zoning would clearly assess the environmental effects on its merits as is usually the case with any development application. There is nothing to indicate any new environmental effects are triggered by the planning proposal itself.

(ix) Has the planning proposal adequately addressed any social and economic effects?

The LL site acts as the northern bookend for a non-residential corridor of land that also includes a local neighbourhood business strip (inclusive of shop-top housing) to the south that is interrupted by a small strip of public recreational land. Beyond the neighbourhood business strip, another small strip of public recreation land occurs further to the south before the



context changes to low density (R2) residential. The LL site is also situated directly across the road from another SP2 site to the east which contains Peakhurst South Public School. To the west and north of the sites, the environmental context is thickly R2 low density residential.

The proposed zoning is a paper-change only to better align with the existing use of the site and the adjacent zoning for the Pindari Road neighbourhood centre. It will not result in any unwanted rezoning precedent because this is the only SP2 'Church' site in this location. By aligning with the pre-existing zoning of the adjacent neighbourhood centre/shops and shop-top housing, it will thus complement the existing centre, and will not in any way redefine it or negatively impact upon the immediate or surrounding environment.

It is possible, and indeed likely that a future redevelopment of land under the zoning proposed will see a multi-use facility that may incorporate a lettable retail and/or commercial tenancy. One suggestion that the proponent will consider is the addition of a future café tied into the recreational outlook of the adjacent public reserve and shops. This would also give the Peakhurst Heights neighbourhood centre a much needed lift in terms of vibrancy and community activation, and ultimately give the neighbourhood centre more of a village feel.

If the planning proposal does not proceed, it is inevitable that the site will become an underutilised or dormant property over time as there will be no incentive under current planning controls to redevelop it, hence the current structure would endure until habitation is no longer safe. The existing zoning is unlikely to translate economically to attract a future market for this site. The Hurstville LGA and surrounding LGAs have numerous examples of small neighbourhood churches that have been vacated over the years where rezonings have been sought for alternative uses. A popular re-use is often child care and pre-school centres.

The location and attributes of the site are highly suited to the usage for which it is currently applied because of its proximity to the local public primary school across the road, the gateway afforded by the adjoining public reserve. This reserve has been hedge-landscaped so as to blend into the site and thus provide a safety and amenity buffer from the roadway and neighbourhood shops for children that frequent the site.

The reputation of LL as a valued pillar of the local community is beyond reproach, and the sustainment of that pillar is ultimately the greatest social gain that would derive from a rezoning determination consistent with that proposed.

(x) Is there adequate public infrastructure for the planning proposal?

The site area of land to be rezoned is 1,170m² and extends an existing neighbourhood centre that is approximately 2,100m² in aggregate. The employment occupancy of the site expressed as a full-time-equivalent index of 37.6 employees is presently more than double that of the entire adjacent neighbourhood centre precinct as determined by the Draft ELS presently on exhibition at just 18.2 employees. Existing infrastructure has already proved adequate for the precinct, and we would remind Council that this planning proposal is in effect a paper rezoning only. The area also affords plenty of on-street parking including 45-degree parking spaces in



front of the neighbourhood centre itself and more than adequately meets the needs of the whole precinct inclusive of LL regardless of its zoning.

(xi) What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?

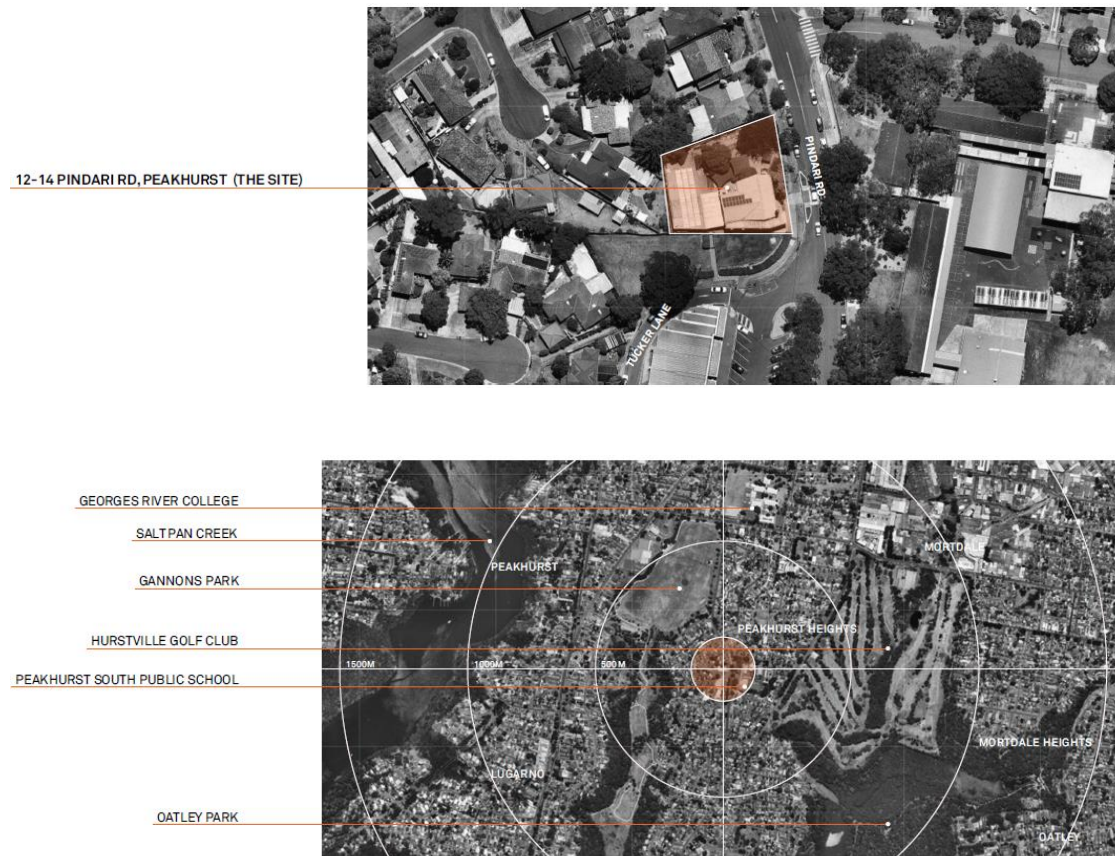
This planning proposal document provides the initial case for Georges River Council to firstly resolve whether or not it endorses the proposal to be forwarded to NSW Planning & Environment for a Gateway determination. Accordingly, this question can only be responded to once the s.117 directions under such a determination are known inclusive of specific agency consultation requirements. These would be addressed by way of an updated/revised planning proposal.



4. PART 4 - MAPPING

Figure 6 provides an aerial perspective of the immediate context of the site, and also the position of the site within a 1.5km radius.

Figure 6 - The Learning Links site and surrounding context

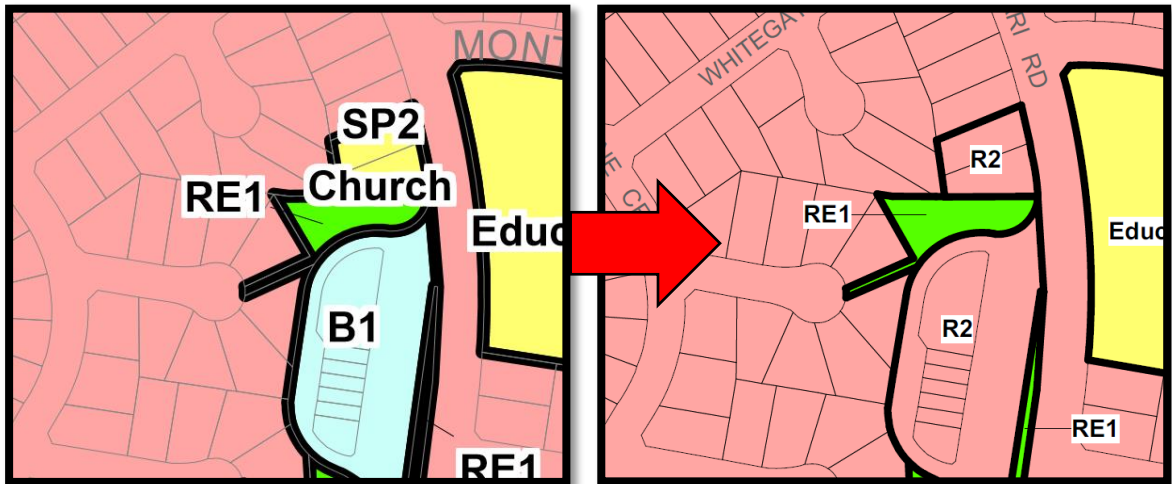


The images above reinforce the description of the surrounding urban context provided in the Introduction section of this planning proposal.

This planning proposal seeks an amendment to be effected to the prevailing zoning map, specifically map LZN_002 (which has had application since 24 July 2015). This map was presented at Figure 4 and appears again below at Figure 7. Under this planning proposal, these sites would both be coloured light red and categorised as 'R2' consistent with the adjacent low density residential sites.

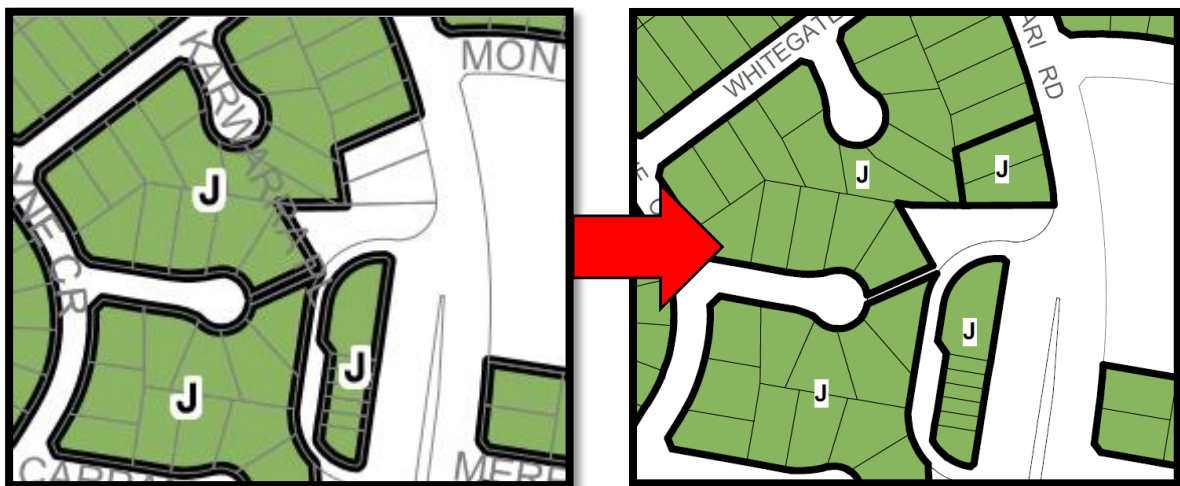


Figure 7 - Extract of Map LZN-002 and proposed amendment to Map



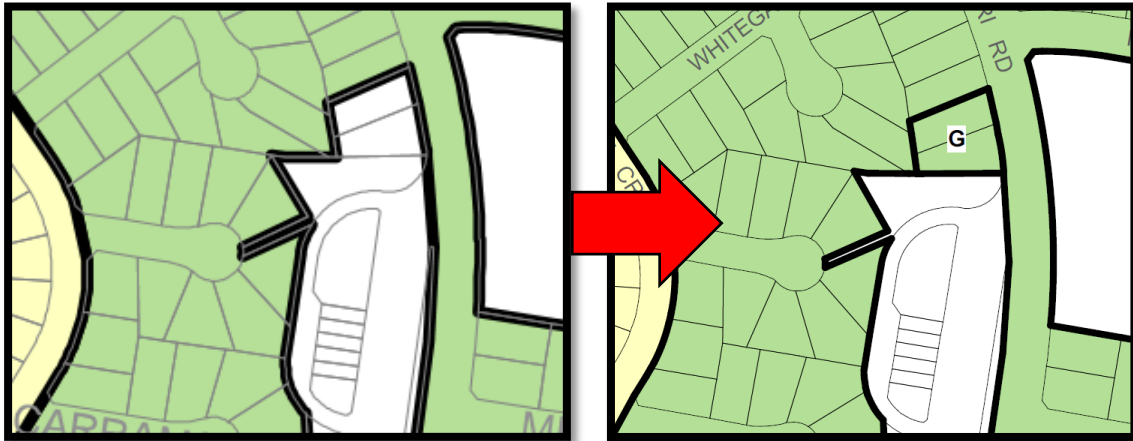
As per map HOB_002, there are presently no **maximum height controls** specified for the sites in question. Figure 8 provides an extract of the map for the LL site. Under this planning proposal, these sites would be coloured green in line with the rest of the surrounding context so that the standard category 'J' height limit of 9.0m applies.

Figure 8 - Extract of Map HOB-002 and proposed amendment to Map



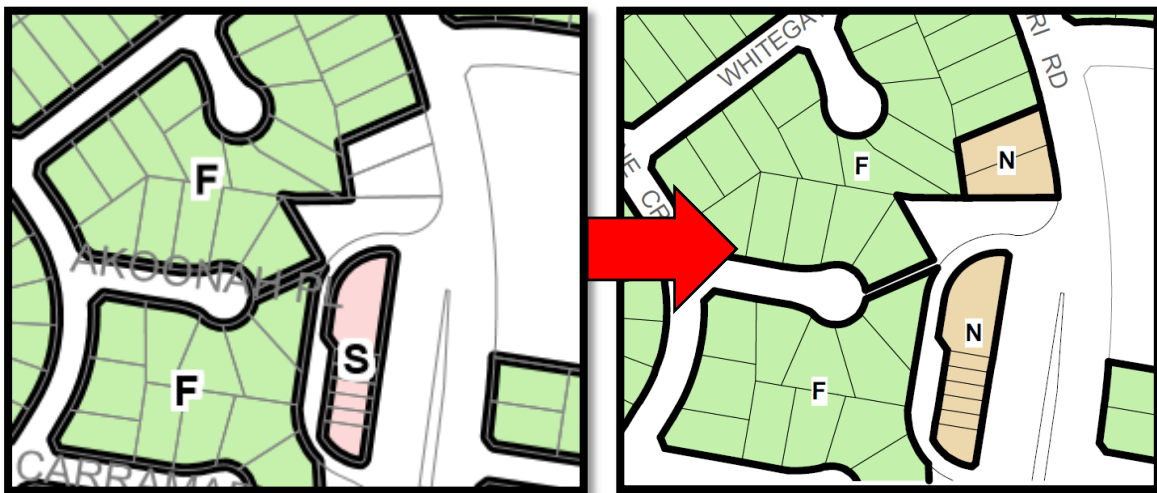
As per map LSZ_002, there is no **minimum lot size** presently applying to the land. Similarly, there is no minimum lot size applying to the adjacent B1 neighbourhood centre either. Figure 9 provides an extract of the map for the LL site. Under this planning proposal, these sites would be coloured green in line with the rest of the surrounding context so that the standard category 'G' minimum Lot size of 450m² for R2 residential in this setting applies.

Figure 9 - Extract of Map LSZ-002



As per map FSR_002, there is presently no maximum **floor space ratio** specified for the sites in question. Figure 10 provides an extract of the map for the LL site. Under this planning proposal, these sites would be coloured gold in line so that the standard category 'N' floor space ratio of 1.0:1 applies.

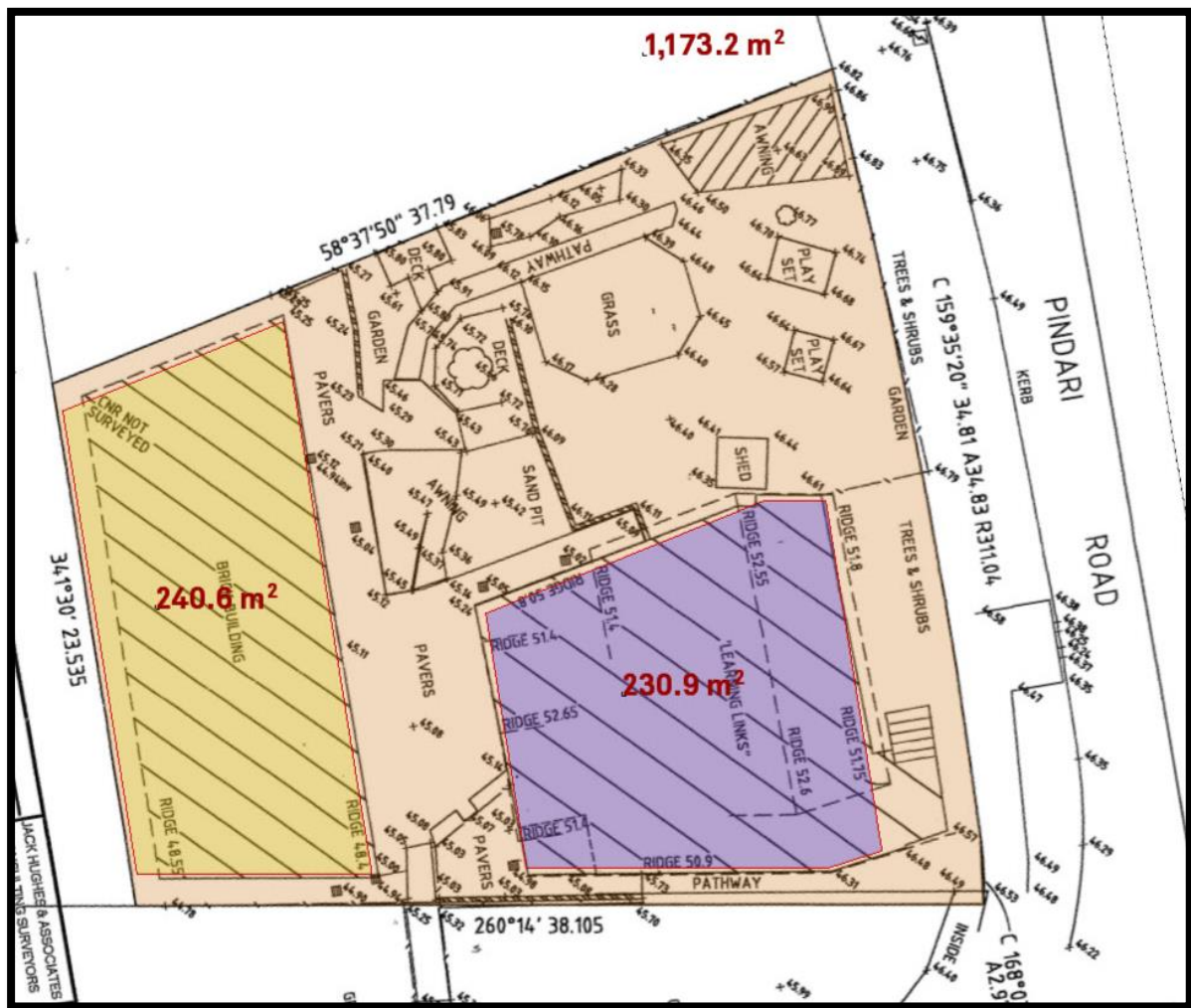
Figure 10 - Extract of Map FSR-002 and proposed amendment to Map



There is no impact upon any other prevailing environmental planning map under HLEP 2012.

Figure 11 provides a survey extract illustrating the GFA overlay for the two existing built forms on-site.

Figure 11 - Site survey and area detail



The yellow-shaded structure comprises two single-level classrooms, while the purple-shaded structure comprises a part-one/part-two storey building best described as a ground floor and basement area. This structure is a former church which was adapted as tutorial rooms, an administration area, meeting rooms, storage and amenities. For simplicity, we have assumed that both levels are fully counted for GFA calculation purposes as the building footprint is essentially the same on both levels. We therefore determine that the existing FSR relative to the 1,170m² in total site area is **0.60:1**. This has been calculated as follows:

- Main (Purple) Structure (2-storeys) – **461.8m²** (230.9m² x 2 floors) situated wholly within the boundaries of 14 Pindari Road
- Yellow Structure (1-storey) – **240.6m²** situated so that 144.5m² is on No.12 while 96.0m² is on No.14 Pindari Road
- **Total GFA – 702.4m²**
- **Consolidated site FSR – 0.60:1**

The two lots of land considered independently deliver the following existing ratios:

- Site FSR for just No.12 Pindari Road – 0.25:1



- Site FSR for just No.14 Pindari Road – 0.95:1

It is therefore apparent that a favourable rezoning determination will not result in a non-compliant FSR outcome for existing structures under the zoning proposed by the planning proposal.

The maximum existing building height of the two storey building on site is 7.57m as measured to the highest point of the roof ridge from natural ground level. Due to the former status of this building as a church, the building also contains an architectural Spire (essentially a one-off building design element) which reaches a maximum height of 9.8m. It is noted that the permissible height of buildings applying to the 'R2' Low Density Residential zone is 9.0 metres. It is therefore apparent that a favourable rezoning determination will not result in a non-compliant Height of Buildings outcome (apart from the Spire) for existing structures under the zoning proposed by the planning proposal. The anomaly arising due to the Spire is considered inconsequential as it is merely a design element only and not capable of any other usage.



5. PART 5 - COMMUNITY CONSULTATION

The introduction to LL at section 1 of this planning proposal points to the obvious extensive reach of LL in the local community.

At the time of writing, the Pindari Road premises alone employs:

- 22 full time staff
- 47 part-time staff
- 122 casual staff
- 1 volunteer

In 2016 alone, 612 individual children passed through LL doors at Peakhurst Heights for learning assistance in one form or another or to attend the pre-school. Assuming a rate of say 1.5 parents/guardians per child, it is therefore likely that around 918 unique adults also visited the premises on a regular or irregular basis.

All the above individuals are community stakeholders with a vested interest to ensure the retention and growth of LL into the future. It must also be said that given the premises in question have operated as a LL centre since the early 1990s, the measure of the volume of alumni (children, parents and staff/volunteers) and community respect for the LL brand would be enormous. It is also well known that the organisation relies heavily upon community funding and tuition fees.

The objective of the planning proposal is to enable LL to endure long-term by putting in place the necessary zoning to bring about an orderly redevelopment of its site. In light of this and the obvious support that both past and present customer families would provide LL who have harmoniously co-existed with surrounding landowners over a long timeframe, the sensitivity of the rezoning proposal is likely to be very low, if any. It is therefore not considered necessary to call or hold a public hearing, nor is there any justification for a public notification period that exceeds the four-week standard.

The obvious parties considered to be potentially impacted by the planning proposal are the three adjoining residential properties to the west and north of the site. There is the less likely possibility that the owners of the adjacent neighbourhood centre may see impacts of both a positive and negative nature, but they are more likely to be neutral given their awareness and acceptance of LL in their existing location.

The CEO of Learning Links has written directly to the owners of the adjoining residential properties regarding its intention to pursue a rezoning of its land through this planning proposal. It is assumed that the standard procedure of public notification by Council following a Gateway determination would suffice in terms of other community consultation. It is also appreciated that the Gateway determination itself will determine if there is a need for further studies ahead of any public notification and consultation period.



6. PART 6 - PROJECT TIMELINE

The project timeline is based upon reasonable judgments for the required processes under the provisions of the EPAA and the Department of Planning and Infrastructure's *Guide to preparing planning proposals*. The department's guidelines note that the timeframe for the completion of the planning proposal will depend on the complexity of the matter, the nature of any additional information that may be required and the need for agency and community consultation. We consider this particular proposal to be simple and non-controversial, and thus would suggest a more streamlined approach be applied in this instance.

The project timeline in the table below sets out an indicative timetable to effect the rezoning desired in this planning proposal.

Figure 12 – Planning Proposal Project Timeline

Project stage	Time period allowed	Estimated completion date
1. Anticipated date for consideration and endorsement of the planning proposal by Georges River Council	3 months	December 2017
2. Anticipated approval and reporting period (Council to NSW P&E)	1 month	January 2018
3. Anticipated date of Gateway determination and commencement date	2 months	March 2018
4. Anticipated timeframe for the completion of any further technical information	1 month	April 2018
5. Commencement and completion dates for public exhibition period	2 months	June 2018
6. Consideration of submissions	1 month	July 2018
7. Anticipated date Georges River Council will forward to the department for notification	3 months	September 2018
Likely timing for HLEP 2012 mapping amendments to be made		September 2018



CONCLUSION

This planning proposal seeks rezoning from SP2 'Church' to R2 'Low Density Residential' with specified additional permitted uses for two adjoining lots of land with a combined area of 1,170m² at 12-14 Pindari Road Peakhurst Heights.

The rezoning is highly unlikely to have any detrimental community impact because the current use of premises is consistent with the zoning sought, and the reason that rezoning is sought is to allow for future site redevelopment for that on-going purpose, or purposes and serve as a transition with the adjacent B1 neighbourhood precinct.

The current use of both lots of land differs greatly from the permissible use of the land as zoned which post-dated the consent to operate the facility for its current purpose as a community-funded learning centre.

The proposal has compelling strategic planning merit and will deliver a more sustainable environmental planning outcome for this area of Peakhurst Heights for the following reasons:

- This unique location and context presents an opportunity to incentivise any future landowner to create a vibrant urban renewal solution for the aggregate site.
- Without rezoning, it is highly unlikely that this site will ever be re-developed.
- Future redevelopment can contribute to the activation of the public realm relative to the existing under-utilisation of adjacent public reserve land and orientation of the existing development;
- It will assist to stimulate the visitation of the greater neighbourhood precinct which is otherwise very quiet and seemingly over-provided for 90-degree parking spaces which are never fully utilised.
- The urban context of the site inclusive of residential, retail, commercial and education uses has excellent alignment with the proposed zoning and additional permitted uses.
- Any future built form outcomes will thus be consistent with the surrounding context.
- It is already clear from the sustainment of the existing operation of LL over the last 24 years that the proposed future use is commercially viable.
- The proposal will not create a precedent or expectations for surrounding landowners to follow because the proponent is the only private owner of SP2 sites in this location. Also, the destination zoning is consistent with the existing surrounding zoning context anyway.
- The proposed new zoning will serve to reinforce and revitalise the existing site use for existing and future employment generating uses through business expansion and the possibility of other commercial or retail tenancy of the property.
- The site is adjacent to a bus stop which provides easy public transport access to the Hurstville Centre and nearby railway stations.
- None of the landholding that is the subject of this planning proposal is environmentally sensitive, nor does it carry any significant biodiversity value.
- There are no environmental hazards or constraints of any significance that would otherwise preclude the approval of the planning proposal.



- There are only three adjoining neighbours to the aggregate site, and the CEO of LL has consulted with them about this rezoning proposal.

Given all the above reasons that demonstrate the strategic planning merit of what is proposed, we kindly request that Georges River Council forward this planning proposal to the Minister for Planning for a Gateway determination in accordance with section 56 of the EP&A Act.



Appendix 1

Copy of submission on the Draft Georges River Council Employment Lands Strategy
25 May 2017



17 May 2017

The General Manager
Georges River Council
PO Box 205
HURSTVILLE NSW 1481

Cc: Ms Birgitte Maibom, Chief Executive Officer - Learning Links

Dear Madam,

Draft Employment Lands Study

I am making this submission as the second of two with respect to the Draft Employment Lands Study ('ELS') which is presently on public exhibition at your Council until 31 May 2017. This particular submission is made on behalf of our client Learning Links, and expressly in regards to the scope, analysis and recommendations of the ELS for the '*Peakhurst Heights - Pindari Rd*' precinct being the location of their largest Sydney operation. An earlier submission was provided by on 16th May on behalf of another unrelated community-focused organisation, namely Penshurst RSL Club.

I will reiterate at the outset that the two submissions are being made on behalf of two community funded organisations that operate to reinvest back into the communities they choose to reach and serve. Accordingly, there are no private sector objectives in the background to both submissions. It is also particularly important for Council to note that in each case, the two organisations are each the largest individual employers in Peakhurst Heights and Penshurst respectively, and by implication, important stakeholders in the outcomes of the ELS.

Observations - Areas of Interest

On behalf of Learning Links at Peakhurst Heights, I make the following observations regarding the ELS, being the aspects of the study upon which this submission is based.

- (i) The scope of the study has considered the inventory of employment lands in the local government area by defining these as sites having any of three different zonings, namely:
- B1 'Neighbourhood Centre'
 - B2 'Local Centre'
 - IN2 'Light Industrial'

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The study deliberately excludes IN1 'Heavy Industrial', B3 'Commercial Core' and B4 'Mixed Use', the latter two zones being isolated to the core of the Hurstville City Centre only. This means the study is really concerned with local government area (LGA) precinct employment centres outside of the regional city core of a non-heavy industrial nature only. It is recognised that these locations are often target areas of debate in a world where employment in all sectors is evolving rapidly and developers and planners beg to differ over the attractiveness of these lands for uses other than shop-top housing or intensive residential development.

(ii) The study undertakes an analysis that looks from the outside in, as well as from the inside out through precinct-by-precinct analysis under each zoning classification. The study identifies that Peakhurst Heights is one of the 14 largest employment suburbs for the LGA, and that in terms of employment precincts zoned B1, the adjacent neighbourhood centre in Pindari Rd at Peakhurst Heights comprises one of 16 such precincts. The precinct is said to have 18.2 full-time equivalent (FTE) employees working in that location and is ranked 6th most significant for the LGA as measured by FTEs.

(iii) The consultants (JLL) that have undertaken the study indicate that they did a door-to-door survey of businesses within each precinct. The survey excluded our client for zoning reasons as discussed later in this submission.

(iv) The study identifies that there will be additional office floor area demand within the Georges River LGA over the years 2014-2031 of some 1,424m² for land in B1 zones, but that the Pindari Road precinct presently has a high vacancy rate for B1 permissive-use space.

Submission

(i) The definition of scope based on selected zoning has meant that the Learning Links site at 12-14 Pindari Rd Peakhurst Heights has been somewhat ignorantly excluded from the study. The reality is that all LGAs will have pockets of employment activity that occurs upon sites where previous zoning or planning permissions allowed for this, and despite subsequent changes in zonings, the employment activities have endured on a pre-existing use rights basis or under a historical permissive use arrangement with Council.

(ii) The Learning Links site is comprised of two adjoining lots adjacent to the Pindari Rd Neighbourhood Centre. Strategic Planning staff at Council are aware of an imminent planning proposal to extend the existing B1 'Neighbourhood Centre' zoning to be inclusive of the Learning Links site given the long-established and accepted usage of that site, and the desire to redevelop the site so as to deliver a better and more integrated facility, and in turn a more active development outcome to bring economic stimulus to the precinct.

(iii) The ELS identifies 18.2 FTE's for the precinct and 6th ranking for that zoning in the LGA. If the ELS had been inclusive of the Learning Links business, the FTE calculation would have instead totalled 55.8 and thus elevate the ranking of this precinct to 4th largest on that measure alone. As the process of door knocking did not include this site, the consultants JLL have drawn conclusions about that precinct that we consider to be misleading.

(iv) While the limitations of the ELS and survey process are appreciated, we do consider that the matter of existing lands in the LGA having an employment use that should otherwise be zoned as such deserve inclusion in this study. This is particularly important if the outcomes of the study will

make recommendations for a basket of proposed LEP amendments that may be the subject of a Council-initiated planning proposal. It would seem pertinent that Council should therefore include the rezoning of certain lands within that basket of amendments as employment lands where landowner support is likely to be strong. This ultimately supports better environmental planning outcomes for the LGA and expands the gross floor area potential of legitimate employment lands.

(v) It is noted that the study draws a comparison between available gross floor area (by precinct) and the size of vacant areas so as to provide a measure of existing vacancy rates. In light of the expected future attraction of the Georges River LGA as a place to both live and work, the study would be more informative if it also showed a further column setting out the maximum GFA potential of each precinct inclusive of the Learning Links site for the Pindari Rd precinct.

(vi) The listing of the top employers by precinct reinforces the points we make above that the exclusion of Learning Links from this study is erroneous. Not only is Learning Links by far and away the largest employer in the Peakhurst Heights - Pindari Rd precinct, it is in fact the largest neighbourhood centre employer in the whole LGA. Even compared to the three B1-zoned precincts that outrank it, with a total of 37.6 FTEs employed at their Pindari Rd site alone, it would appear that Learning Links is not even surpassed by Coles at Oatley West.

In conclusion, for the various reasons stated above, we would suggest that Council advise its consultants JLL to make an exception for the Learning Links site at Peakhurst Heights to include them in scope by exception, and to note the reasons in the study. Reference should also be made to the imminent lodgement of their planning proposal to seek rezoning of that land from its existing SP2 'Church' zoning to that of B1 'Neighbourhood Centre'. To otherwise champion an employment lands study that completely omits any reference to an employer that would be the largest if measured under a B1 zone, or one of the largest if measured under a B2 zone would in our view undermine the completeness of the study.

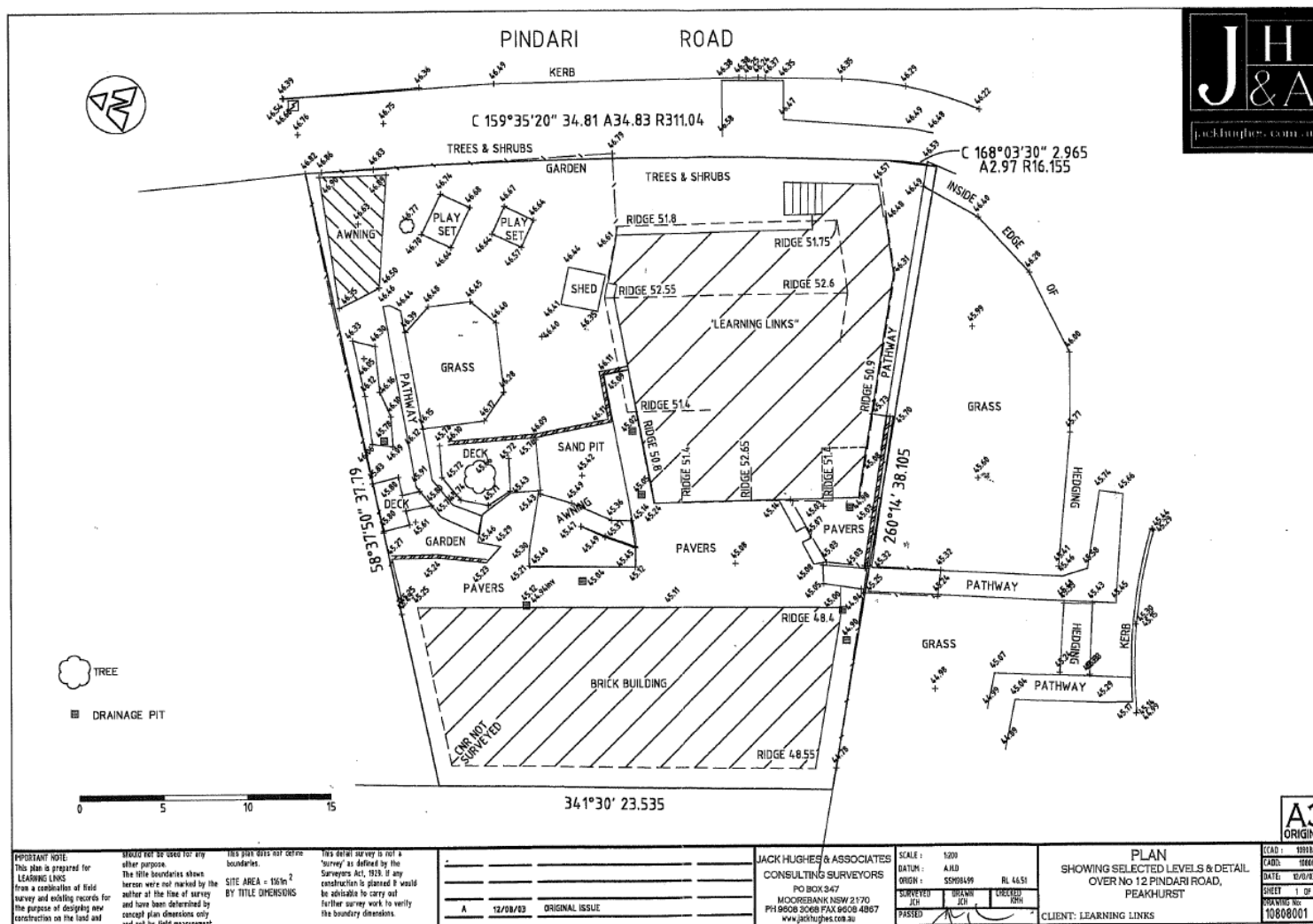
Finally, Council are advised that Learning Links is in the final stages of drafting its planning proposal and expects to lodge this into Council by the end of May 2017, if not before. We thank Council for the quality of strategic planning discussions about both our client sites over the last 6-months, and we look forward to working with Council to help drive better planning outcomes for the precincts of interest within the Georges River LGA.

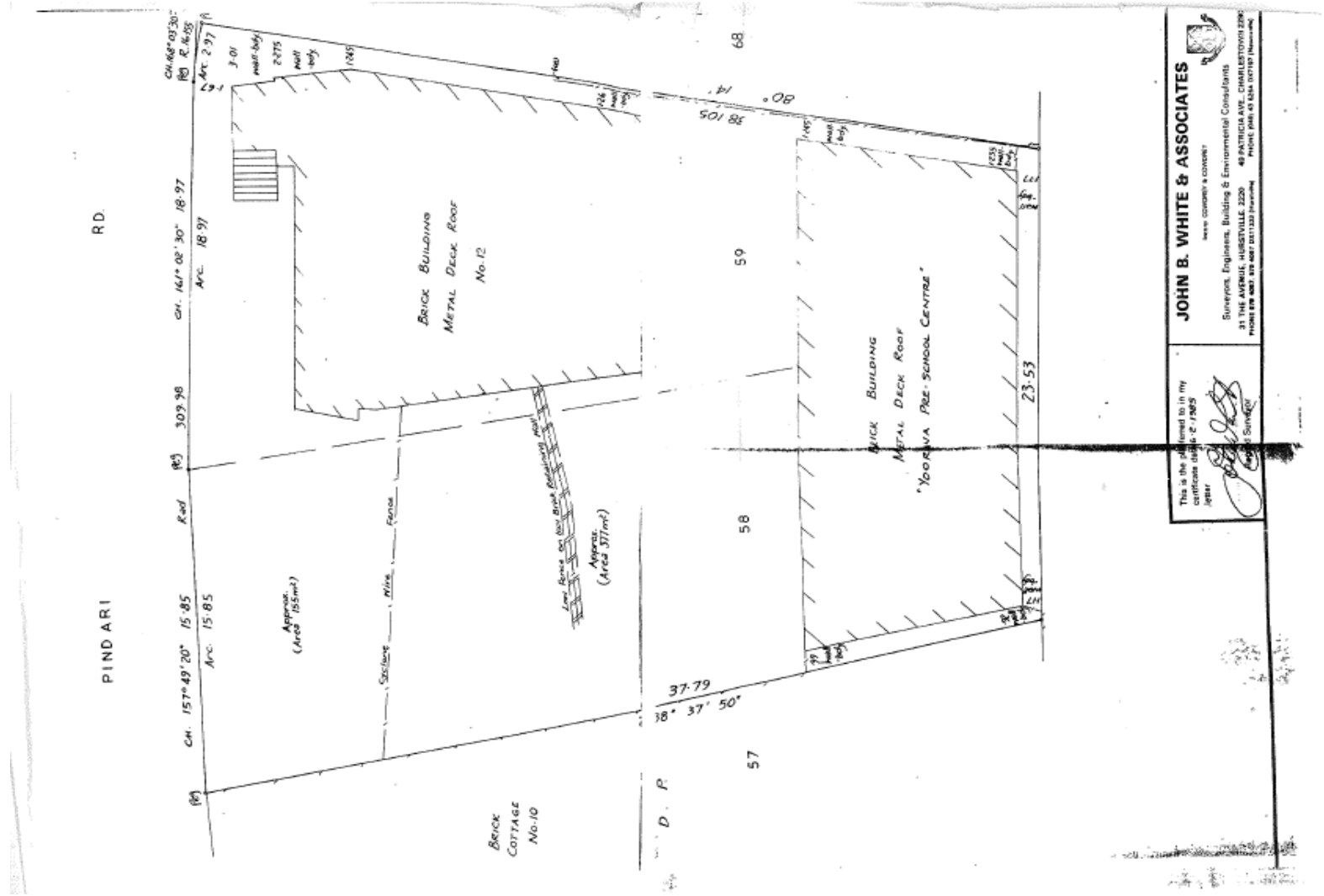
Yours faithfully,



Wayne Camenzuli
Managing Director
Capital Syndications Pty Ltd (trading as Innova Capital)
Environmental planners and project directors

Site survey





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