

12 August 2016

OUR REF: 5500

The General Manager
Lake Macquarie City Council
Box 1906
HUNTER REGION MAIL CENTRE NSW 2310

Attention: Fiona Stewart

Dear Fiona,

RE: DA/202/2016 – Residential Aged Care Facility
64-72 Warners Bay Road, Warners Bay

I refer to your letter dated 22 March 2016. The following correspondence has been prepared on behalf of the applicant to address each item in your letter.

1. DEPARTMENT OF PRIMARY INDUSTRIES

Plan or diagram showing proposed works within the bed and bank of the watercourse

Council has indicated that the watercourse (South Creek) located along the southern boundary is classified as a 3rd order stream. The proposed Vegetated Riparian Zone (VRZ) generally achieves 30 metres in width. However, MPC consulting engineers have provided amended stormwater plans that show some work in the riparian area and watercourse (Attachment 3).

Work in the watercourse includes a headwall outlet and drainage line. Scour protection is also proposed within the watercourse on both boundaries for stormwater management.

Plan or diagram showing proposed riparian corridor

Architectural plan Drawing DA09 (Issue E) (Attachment 1) and Figure 1 of the Vegetation Management Plan (Attachment 2) show proposed works within the riparian zone. The plans generally show a 30 metre setback from the riparian zone for buildings as requested by Department of Primary Industries Water, with a minor exception for the north-western corner of the building.

It is considered that the proposed building will have minimal impact on riparian vegetation and due to its elevated nature will allow ongoing movement of water.

2. ADDITIONAL REPORTING

Odour

A Qualitative Odour Assessment has been prepared by RCA Australia (Attachment 4) the assessment aims to demonstrate that the proposed development is predicted not to cause adverse odour impacts at the residences nearby and to provide recommendations regarding the mechanical design of the ventilation of the proposed laundering and food preparation activities.

On the basis of the information available at the time of compiling this report, RCA assessed that the odours which may be produced from the development will not have an adverse odour impact on



sensitive receptors in the vicinity of the proposed development, including the residences positioned in the local vicinity of the development.

RCA also provides the following recommendations for the mechanical design of the ventilation systems (proposed commercial laundering (laundry room exhausts) and food preparation activities) to minimise the impacts of odours at the residences under all weather conditions, including adverse conditions for odour dispersion (e.g. a cold, still morning):

- Ensure that the roof exhausts have a stack height of at least 2m above the roof.
- Ensure that the exhausts for the laundry room and food preparation activities discharge vertically and the lateral distance between these (2) roof exhausts is at least 4m.
- Provide mechanical ventilation (i.e. by exhaust fan) so that a minimum velocity of 15 m/s is achieved at the exhaust exit. This velocity is the industry accepted (minimum) standard for providing sufficient dispersion of air emissions including odours to minimise impacts,
- Consider incorporating smaller scale odour treatment in the exhaust stream, for example, charcoal treatment, providing the odour treatment equipment does not adversely affect the exhaust velocity.

Social Impact Assessment

The rear portion of 74 Warners Bay Road is zoned RU4 Primary Production Small Lots. The RU4 zoned portion of the site is not used for primary production and given its close proximity to dwellings and the watercourse is not a preferred location for primary production. An existing development involving independent living units for seniors is located to the east of the site and as such the proposed development is in keeping with existing use in the area and will not impact on rural land uses.

BUPA is a provider of contemporary aged care services and the proposed development seeks to provide purpose built housing for an important cohort of the Lake Macquarie community. There is a recognised urgent need in the Hunter for housing for seniors and people with a disability.

The proposed use provides essential housing of a type that benefits the entire community by providing housing for seniors that benefits occupants and their families.

Vegetation Management Plan

An amended Vegetation Management Plan is provided in Attachment 2. The VMP describes existing riparian vegetation and protection measures. Including revegetation and ongoing maintenance Section 2.1 of the VMP provides methods to protection the riparian zone during construction works. Measures for weed control and protection of the riparian zone in perpetuity are provided in Section 2.2 and 2.3 respectively.

Section 3 of the VMP provides methods of rehabilitation of the riparian zone including defining borders, weed management, revegetation and planting. Section 4 of the VMP provides methods of ongoing monitoring and reporting to encourage revegetation and long-term survival.

A revised landscape plan and design report is provided in Attachment 7. Key aspects of the landscape plan include individual and community amenity, clear orientation, sense of ownership and interesting and stimulating environment. Key parts of the site have been considered, including the riparian zone. All landscape works to be undertaken within the riparian zone to be undertaken in accordance with the VMP including:

- Removal of rubbish and debris
- Weed management to guide control and removal of exotic weed species
- Revegetation to guide the restoration of the site with endemic and native species
- Monitoring and reporting



It is proposed to use a Gross pollutant trap, first flush devices and underground detention tanks for the management of stormwater quality and quantity from the developed site.

Plan Inconsistency

Inconsistencies in plans have been addressed by providing new architectural plans (Attachment 1).

Streetscape Elevation

A revised visual assessment has been prepared to consider visual impact of the proposed development (Attachment 10). The assessment states the suburb of Warners Bay is a distinct coastal village on the foreshore of the lake and is a popular destination for holidaymakers and caters for a wide range of recreational activities both onshore and offshore.

The assessment found that overall the proposed development would result in a level of landscape and visual impact considered to be minor. This takes into consideration the range of impact levels as assessed at the particular viewpoints. It is also due to:

- the limited opportunities for expansive views of the site as a result of the local undulating topography
- existing residential development which restricts viewsheds to the site
- mature tree cover which also obscures views.

As anticipated, the proposal has the most impact on immediately adjoining properties. There is only one viewpoint which deviates substantially from this overall rating and that correlates to the immediate change in the streetscape from across the road, where it is deemed that "the proposal forms a significant and immediately apparent part of the scene that affects and changes its overall character" (as defined by the "severe" rating, (LMCC, 2013)).

However, it is worth noting that not all of the residential properties immediately across the road from the site address the road frontage or the site, opting to use high fencing or address alternate roads in the case of corner lots. Additionally, the area is showing signs of change, evidenced by the existence of Lymington Village (a higher density age -exclusive development), occurring immediately on the sites eastern boundary.

Signage Plan

A signage and fencing plan is provided in Attachment 1 (Drawing DA60) that presents proposed signage for the development.

Fire Stair

The fire stair has been amended to allow egress only with no visitor or staff access into the building.

3. GENERAL INFORMATION

Access to Waste Storage and Waste Management

Access has been provided to the waste storage area through internal double doors and an external roller door. The waste storage area is located close to the proposed laundry and elevators that connect to the kitchen above. Access to the waste storage area is appropriate for the operations and provides direct internal and external movement of waste.

A Waste Management Plan (WMP) has been prepared by Universal Foodservice Design (Attachment 5). The WMP addresses issues such as construction of waste management areas, access, types of waste, disposal and recycling. The WMP is an operational plan that addresses operational requirements of the facility.

Fire Sprinkler

A fire sprinkler system will be installed if required to the relevant Australian Standard.



- Re-vegetation will include sourcing and propagating from local seed source, from nurseries specialising in growing native seedlings.

Buffer to Endangered Ecological Communities

Section 2.3 of the VMP (Attachment 2) states on-ground measures...will be combined with a restrictive covenant under Section 88B of the *Conveyancing Act 1919*. This will ensure that the site's riparian zone is protected in perpetuity.

Drawing Number 1100 (Issue D) (Attachment 7) provides for setback to the riparian zone and retention of vegetation in that area. Proposed buildings will generally be constructed more than 30 metres from the riparian zone and coupled with erosion and sediment control during construction are unlikely to impact on Endangered Ecological Communities.

A revised Arborist report has been prepared (Attachment 8) to assess the impact of the proposal on trees. The report found nine low category trees will be lost; however, a comprehensive landscaping scheme to mitigate these losses is proposed that will include planting new trees.

Noise Report

An amended Noise Report has been prepared (Attachment 9) to consider the revised plans. The report found that there will be no adverse impacts on or from the proposal, subject to recommendations given in this report, and that it could operate in compliance with noise limits as may be set by Council should the proposal be approved.

Architectural Plan Amendments

Jackson Teece have made changes to the architectural plans (Attachment1) as follows:

- Incorporation of Back of house areas alongside Front of House areas – northern rooms of residential wings relocated to accommodate BOH/FOH areas between flanking residential wings
- Front of house entry now level with ground floor
- Main entry canopy and Porte Cochere redesigned
- Health Hub has been relocated to eastern side of the site
- Inclusion of roof access stair for mechanical roof plant
- Building has been moved slightly north away from southern most sewer line and contracted to move away from northern most sewer line. Because of this movement the ground floor RL has raised to 6.500 as per the rule 1:100 year flood line + 500mm free board
- Large existing tree at the front of the site is now retained and the front of house areas redesigned to accommodate
- Entry driveway has moved slightly east to align with new building entry and existing retained tree
- Left turn in lane on Warners Bay road has been removed and replaced with on street parallel parking.

Stormwater Management

The Stormwater Management Plans (Attachment 3) have been amended. The attached plans Stormwater Management Plans include:

- Proposed water quality measures
- Water harvesting
- Detention tanks.



Health Hub

The proposed health hub would deliver genuine integrated and coordinated primary health care from a multidisciplinary team of qualified health care providers. The main focus of the Health Hub would be the provision of GP led multidisciplinary services, with the choice of professionals being influenced by the anticipated health needs of the Bupa residents.

Likely allied health options include dietetics, psychology, exercise physiology and/or podiatry. The health hub would support the provision of primary care to the residents of Bupa RACF. This capability will be an extension of Bupa Care Services Australia's Integrated Care Model that continues to demonstrate significantly improved health outcomes for residents of our care homes. The service will utilise technology enhanced, evidence based practices to deliver high quality, person-centred preventive and holistic health care.

Travel Distances

A letter has been provided by NewCert (Attachment 6) confirming that the architectural plans are capable of achieving compliance with the Building Code of Australia, including exit travel distances.

Access

A revised Statement of Compliance for People with a Disability has been provided (Attachment 11) that found the proposal can achieve compliance with the access provisions of the BCA.

Traffic

A revised Traffic Impact Statement (Attachment 12) has found the proposed redevelopment of the site should be approved on traffic and parking grounds. The additional traffic demands associated with the development of the site will have a minimal impact upon the local road network and the proposed access provides for a safe and appropriate layout.

Flooding

Preliminary Flooding Advice has been provided (Attachment 13)

4. CLAUSE 4.6 – EXCEPTION TO DEVELOPMENT STANDARD

Development Standard

Approval for the development is sought under Clause 7.12 of Lake Macquarie Local Environmental Plan 2014 (LEP). Pursuant to Clause 4.3 of the LEP the maximum building height for the site is 8.5 metres. In the LEP height of building means:

"the vertical distance between ground level (existing) and the highest point of the building, including plant and lift overruns, but excluding communication devices, antennae, satellite dishes, masts, flagpoles, chimneys, flues and the like."

Clause 4.6 of the LEP enables Council to consider a variation to development standards including height limits. The clause provides flexibility in applying certain development standards and aims to achieve better outcomes for and from development by allowing flexibility in particular circumstances. It is relevant to note that the height standard is not expressly excluded by the clause.

Sub clause (3) requires an applicant to provide written justification for the contravention of the development standard demonstrating:

- (a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case*
- (b) that there are sufficient environmental planning grounds to justify contravening the development standard*

Justification


This correspondence aims to satisfy the requirements of Clause 4.6(3) to facilitate a variation to the 8.5 metre height limit. As detailed in architectural plans (Attachment 1), a height of 10.5 metres is proposed. Height is predicated by the 6.5 metre ground floor required to achieve the minimum floor level

The proposed variation is made having consideration for each component of Clause 4.6 and in accordance with the NSW Department of Planning and Infrastructure (DP&I) guideline Varying Development Standards: A Guide and has incorporated relevant principles of *Four2Five Pty Limited v Ashfield Council* [2015] NSWLEC 90 and *Wehbe v Pittwater Council* [2007] NSWLEC 827.

Each component of the clause is addressed in Table 1.

Table 1: Justification against the requirements of Clause 4.6

Clause	Response / Justification
<i>Clause 4.6 (1) The objectives of this clause are as follows:</i>	
<i>(a) to provide an appropriate degree of flexibility in applying certain development standards to particular development,</i>	Noted. Flexibility in the application of the height standard is considered reasonable and appropriate in the circumstances of this application.
<i>(b) to achieve better outcomes for and from development by allowing flexibility in particular circumstances.</i>	<p>The proposed built form achieves the floor space required to meet the needs of the applicant and to provide a modern, quality building. In order to provide appropriate floor levels to avoid flooding while minimising impact on riparian areas the rear (southwestern) portion of the building has been raised. Elevating the site above flood levels allows for use of otherwise non-developable land and coupled with 3.5 metre floor to ceiling heights for the ground and first floor results in a building above the permissible building height. The 3.5 metre internal height provides a high quality living environment with high levels of solar access and feeling of openness that will enhance the experience for residents of the building.</p> <p>The proposed design also retains the significant existing tree at the front of the site. Building footprint is also minimised to allow for additional landscaping and setback from the road to improve visual impact of the building and soften the built form. The elevated rear of the building minimises earthworks, reduces site coverage and retains existing vegetation and as such is considered a better outcome that would be achieved with a different design.</p>
<i>Clause 4.6 (2) Development consent may, subject to this clause, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However, this clause does not apply to a development standard that is expressly excluded from the operation of this clause.</i>	The development standard is not expressly excluded from the operation of Clause 4.6.

Clause	Response / Justification
<p><i>Clause 4.6 (3) Development consent must not be granted for development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating:</i></p>	
<p><i>(a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case.</i></p>	<p>The development standard significantly limits development on a large sloping site to single storey or split level built form. There are no outstanding characteristics of the site that would warrant such a limitation having regard to visual impacts, views to and from the site and ecological impacts and therefore the standard is unreasonable and unnecessary, as discussed in further detail below.</p> <p>Visual impacts</p> <p>The height of the proposed two-storey building is such that it will sit comfortably within the natural and built environment context. A number of dilapidated dwellings are located on site and the proposed building will improve the overall appearance of the site.</p>  <p>Photo 1: Existing dwellings on site</p> <p>The proposal will integrate with the existing built form so as to be visually integrated with surrounding environment (refer to in the Statement of Environmental Effects showing neighbouring properties).</p> <p>As detailed in information previously provided by the applicant, the design utilises effective street aesthetics such as large setbacks as follows north (Warners Bay Road) approximately 50 metres, south (Riparian) approximately 30 metres, east 7.1 metres and west (including Stormwater Easement) 8.1 metres), retention of existing vegetation, extensive landscaping to the street and grounds and circular design drive to enhance the visual impact of the development. Construction materials include colourbond, privacy and sun screens, brickwork and rendered</p>

Clause	Response / Justification
	<p>blockwork. The scale and massing of landscape planting also has the ability to reduce the visual bulk of the dwelling. The elevated rear portion of the building minimises retaining and avoids impact to riparian areas.</p> <p>The Lake Macquarie Scenic Management Guidelines 2013 identify the site as being within Scenic Management Zone 5. The visual quality of the general area relates to its proximity to the lake. The impact of the proposed development height on the locality is managed in the following ways:</p> <ul style="list-style-type: none"> • setting the building to the rear of the site to soften the built form; • retaining and enhancing riparian vegetation at the rear of the site; • retaining the existing established tree at the front of the site; • landscaping associated with the proposed dwelling will soften the visual impact and ensure the site integrates with the mix of urban and bushland setting; • proposed building materials and colours are appropriate to the site – there is no use of reflective materials or glass balustrades. • site coverage (26.5% total landscaped area) has been kept to a minimum. <p>Views</p> <p>The site is not within proximity to, or visible from, a significant landscape feature (such as lake foreshore, coastal headland, public reserves or heritage properties) that would be impacted by the proposed height of the dwelling.</p> <p>The proposed development will present as a new purpose built building to the street that will integrate well with existing houses and the seniors living development to the east. The proposal will not be visible to or from the lake and retention of vegetation at the rear of the site will enhance the final visual impact from properties to the south.</p> <p>Departure from the standard</p> <p>In establishing that compliance with the development standard is unreasonable and unnecessary, the following principles have been addressed:</p> <ul style="list-style-type: none"> • the underlying objective or purpose is not relevant to the development – this has been addressed in terms of reduction of visual impacts through high quality development, landscaping and appropriate materials • the development standard would result in a poor outcome for occupants of the building. The proposed development has 3.5 metre floor to ceiling heights that add space, light and openness to the internal environment and provide a better outcome that complying with the standard and reducing internal heights • objective of the R2 and RU4 zone can be met by the proposed development. The proposed development provides a much needed type of housing in a residential environment and avoids land use conflicts with adjoining land uses. <p>Summary</p> <p>The proposal demonstrates that due to the attributes of the site (including its topography and generous proportions) and the nature of the proposal, the 8.5 metre height restriction is unreasonable and unnecessary in this instance.</p>
(b) that there are sufficient environmental planning	The proposed height does not affect the ability to comply with relevant development standards and controls. As a result, the proposal retains the

Clause	Response / Justification
<p><i>grounds to justify contravening the development standard.</i></p>	<p>amenity of the site and neighbouring dwellings.</p> <p>Setbacks</p> <p>The proposal achieves all setback requirements. Substantial setbacks are proposed between the proposed building and front and rear boundaries enabling the site to achieve privacy, solar access and landscaping requirements.</p> <p>Boundary setbacks are as follows:</p> <ul style="list-style-type: none"> • North (Warners Bay Road) approximately 50 metres • South (Riparian) approximately 30 metres • East 7.1 metres • West (including Stormwater Easement) 8.1 metres. <p>Privacy</p> <p>The siting and design of the proposal results in minimal privacy impacts to neighbours. Outdoor living spaces are located on the ground floor and surrounded by the proposed building, in this regard the additional height proposed will not increase the potential for overlooking of neighbouring properties.</p> <p>In addition, the windows are located as far as practicable so they do not provide direct or close views into the windows of other dwellings or other properties. The easement of 5.64 metres in addition to the building setback creates a setback to the north-western boundary of 8.183 metres. The large setback increases privacy and minimises potential overlooking of adjoining properties. Land to the south-east is a similar type of development and is provided with a setback of 7.1 metres that also increases privacy and minimises potential for overlooking. It is considered that the design avoids impact to privacy, has adequate setbacks from boundaries and when coupled with proposed landscaping there is minimal potential for impact to privacy of adjoining residents.</p> <p>Solar access / overshadowing</p> <p>The building siting and orientation, along with the substantial separation between the proposed dwelling and any neighbouring properties means that the additional height will not result in overshadowing or loss of solar access to adjoining properties. A slight impact will occur to properties on the south eastern boundary in evenings mid-winter only. This is shown in the shadow diagrams submitted with the DA, and provided in Attachment 1.</p> <p>Site Coverage</p> <p>The proposed 26.5% total landscaped area is considered to be a positive outcome for the development site. It is likely that a single storey or split level construction would result in a much larger site coverage. The proposed site coverage enables the proposal to achieve setbacks, private open space, driveway and landscape requirements.</p> <p>Landscape</p> <p>A substantial proportion of the site is available for landscaping. Opportunity exists for deep soil planting as well as other forms of vegetation suited to the site and its residential use.</p> <p>Energy and Water Efficiency</p> <p>The proposed height does not affect compliance with energy and water efficiency targets.</p> <p>Orderly and Economic Development of Land</p>

Clause	Response / Justification
	<p>The development promotes the proper and orderly development of land as contemplated by the controls applicable to the zone, which is an objective of the <i>Environmental Planning and Assessment Act 1979</i> (s 5(a)(ii)) and which it can be assumed is within the scope of the "environmental planning grounds" referred to in cl 4.6(4)(a)(i) of the LEP.</p> <p>The development represents a use that is permissible with consent in the zone, and is consistent with the zone objectives. It is located within an area that is serviced by existing roads and other essential infrastructure. In this regard, the proposal represents the orderly and economic development of land.</p> <p>Summary</p> <p>The above demonstrates that the additional height sought by the proposal will not result in unreasonable impacts to the physical environment, the views or visual quality of the site or the amenity of neighbours. The proposal is consistent with the use and built form of surrounding development and will make a positive contribution to the streetscape. In this regard, there are sufficient environmental planning grounds to justify the proposal.</p>
<p><i>Clause 4.6 (4) Development consent must not be granted for development that contravenes a development standard unless:</i></p>	
<p><i>(a) the consent authority is satisfied that:</i></p> <p><i>(i) the applicant's written request has adequately addressed the matters required to be demonstrated by subclause (3), and</i></p> <p><i>(ii) the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out, and</i></p>	<p>This correspondence aims to adequately address the matters required to be addressed in sub clause (3).</p> <p>Clause 4.6(4)(a)(ii) requires consideration of the objectives of the development standard and the zone objectives. Pursuant to Clause 4.6(4)(a)(ii) Council may be satisfied that the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out.</p> <p>The objectives of the height standard are:</p> <p style="padding-left: 40px;">(a) to ensure the height of buildings are appropriate for their location,</p> <p style="padding-left: 40px;">(b) to permit building heights that encourage high quality urban form.</p> <p>The information provided above aims to demonstrate that the height of the proposed dwelling is appropriate for the location having regard to the surrounding development, the response to the scenic qualities of the site, compliance with development controls and protection of residential amenity. The proposal also responds appropriately to the physical attributes of the site. A design that requires a lower building height has the potential to result in greater environmental impacts through a larger building footprint and associated impacts such as tree removal, impact to the riparian zone, soil disturbance and stormwater runoff.</p>
<p><i>(b) the concurrence of the Secretary has been obtained.</i></p>	<p>Noted. Council is responsible for obtaining the consent of the secretary.</p>
<p><i>Clause 4.6 (5) In deciding whether to grant</i></p>	

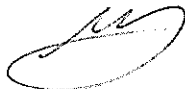
Clause	Response / Justification
<i>concurrence, the Secretary must consider:</i>	
<i>(a) whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and</i>	It is considered that contravention of the development standard does not raise any matter of significance for State or regional environmental planning.
<i>(b) the public benefit of maintaining the development standard, and</i>	As demonstrated throughout this correspondence, the contravention of the development standard will result in minimal environmental and social impacts. The public benefit of maintaining the standard will be minimal.
<i>(c) any other matters required to be taken into consideration by the Secretary before granting concurrence.</i>	Noted.
<i>Clause 4.6 (6) Development consent must not be granted under this clause for a subdivision of land in Zone RU1 Primary Production, Zone RU2 Rural Landscape, Zone RU3 Forestry, Zone RU4 Primary Production Small Lots, Zone RU6 Transition, Zone R5 Large Lot Residential, Zone E2 Environmental Conservation, Zone E3 Environmental Management or Zone E4 Environmental Living ...</i>	N/A. The proposal involves subdivision of land in the form of lot consolidation to enable effective and ongoing management of the site.
<i>Clause 4.6 (7) After determining a development application made pursuant to this clause, the consent authority must keep a record of its assessment of the factors required to be addressed in the applicant's written request referred to in subclause (3).</i>	Noted.
<i>Clause 4.6 (8) This clause does not allow development consent to be granted for development that would contravene any of the following:</i> <i>(a) a development standard for complying development,</i> <i>(b) a development standard that arises, under the</i>	Noted.

Clause	Response / Justification
<p>regulations under the Act, in connection with a commitment set out in a BASIX certificate for a building to which <u>State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004</u> applies or for the land on which such a building is situated,</p> <p>(c) clause 5.4,</p> <p>(ca) clause 2.8, 6.1 or 6.2.</p>	

5. CONCLUSION

We respectfully request Council's consideration of a proposed variation to the height limit set by Clause 4.3 of Lake Macquarie LEP 2014. The proposed variation is permissible pursuant to Clause 4.6 of the LEP. Sufficient planning grounds exist for the proposal to be supported, and a better environmental outcome achieved than if the required height is complied with. Thank you in anticipation of your assistance in this matter. Should you have any queries in relation to the DA please do not hesitate to contact the undersigned on (02) 4942 5441.

Yours sincerely
de WITT CONSULTING



Mark Maund
TOWN PLANNER

Attachments:

1. Architect plans
2. Vegetation Management Plan
3. Stormwater Management Plan
4. Odour Assessment
5. Waste Management
6. BCA letter
7. Landscaping plans
8. Arborist Report
9. Noise Assessment
10. Visual Assessment
11. Access Report
12. Traffic Assessment
13. Flooding Advice