



## **PLANNING ADVICE: CLAYMORE SENIORS LIVING**

### **1. Introduction and Summary**

This report addresses the consistency of two development applications lodged with Campbelltown City Council for 55 new seniors housing units (self-contained dwellings as in-fill self-care housing), which are to be built in Stage 1 of the Claymore Renewal Project with the Concept Plan approval for the Claymore Urban Renewal Project. The applications are numbered by Council as DAs 566/2017 and 567/2017 respectively.

The two sites proposed are:

- Lot 1069 in DP1203266 - fronting Rosslyn Drive, adjoining Badgally Reserve and adjacent to the future proposed retail centre site;
- Lot 1064 in DP1203266 - fronting Dowie Drive, with secondary frontages to Glenroy Drive and Crowley Boulevard.

Consideration is given to the requirements for general consistency with the terms of approval of the Concept Plan, the transitional arrangements for major projects and relevant provisions of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.

### **2. Consistency with the Concept Plan**

The Concept Plan for the Claymore Renewal Project was approved by the Minister for Planning (via his delegate) on 24 May 2013, as described in Schedule 1 of the approval.

The Minister also determined that the project is no longer a project to which part 3A applies and that all subsequent approvals were to be subject to Council assessment under Part 4 of the EP&A Act. Therefore, future proposals could be considered by Council on their merits, generally in accordance with the terms of the Concept Plan approval.

The Concept Plan was approved subject to various terms of approval and modifications in Schedule 3. Term of approval No 2 requires the proponent to carry out the Concept Plan generally in accordance with, relevantly, the Environmental Assessment Report accompanying the application and the Response to Submissions and Preferred Project Report and Appendices.

Schedule 4 of the Concept Plan approval includes further environmental assessment requirements for applications under Part 4 of the Act. This would include development applications and applications for complying development certificates.

The Environmental Assessment Report accompanying the application includes the following references of relevance:

S3.6:

*"Multi-unit housing in the form of seniors housing is proposed and is expected to have a maximum height of 2 storeys." (emphasis added)*

Comment:

This expectation in 2013 for the seniors housing built form was made well in advance of any detailed design work being completed or any design dialogue occurring with Campbelltown Council and the Claymore community. Accordingly, the Concept Plan approval embodies some flexibility regarding permissible height for the seniors housing proposals, as distinct from the predominant detached residential housing form, to recognise that key design considerations for these units were yet to be realised.

Subsequently, during 2016, both Council and the community strongly expressed their design preferences for:

- Multiple lift cores to be provided within the buildings (further recognising the need for these lifts to be economically viable through additional units);
- Resident car parking provision on site at a ratio of 1 space for each unit;
- Higher density to be provided on the approved seniors housing sites, observing their superior access to public transport and other community facilities.

S3.7

*"It is expected that the predominant built form will be detached and attached dwelling houses with some small lot housing forms and seniors units. The Concept Plan envisages four additional seniors housing developments each comprising approximately 25 units. Indicative locations for seniors housing is shown on the Concept Plan. These may change during detailed design in response to housing needs as assessed by Housing NSW. It is not expected that such multi-unit housing would exceed 2 storeys in height".*

Comment:

The language in the Concept Plan approval concerning the seniors housing element provides flexibility in advance of detailed design. Four sites are "envisaged", "indicative locations" that "can change" and the height "not expecting" to exceed 2 stories. Following the completion of detailed design and on-going consultation with both Council and the community, Council's consideration of both proposals on their merits is possible.

S4.2.1:

*"The height bulk and scale of development envisaged under the Concept Plan is described in Sections 3.5 and 3.6. The Concept Plan envisaged development having a height generally of 1 to 2 storeys in the form of detached and attached dwellings.*

*Some multi-unit housing such as seniors housing or other forms of social housing is also envisaged in selected locations, primarily close to the town centre and potential public transport services. The Concept Plan envisages four additional seniors housing developments each comprising approximately 25 units. It is not expected that such multi-unit housing would exceed 2 storeys in height. Indicative locations for seniors housing is shown on the Concept Plan”.*

Comment:

In addition to the previous comments made concerning assessment flexibility, both proposed sites are well serviced by public transport services (via bus).

The site on Rosslyn Drive has superior amenity, through its location next to the recently constructed Badgally Reserve as well as through its location opposite the future new retail centre envisaged for Claymore. Transport for NSW has also advised that a new bus service will be commenced along Badgally Road (from Gregory Hills, future Route 840) around Christmas 2017, well in advance of completion of the complex in early 2019. The bus stops will be made available as part of the forthcoming Stage 3 subdivision application for the Claymore Renewal Project.

In addition, it is worth observing that the bulk and scale of the Rosslyn Drive proposal seeks to take advantage of this superior amenity, and to increase the density level appropriately around the new town centre precinct. This outcome further satisfies the Concept Plan desires for more surveillance over the adjoining Badgally Reserve as well as greater accessibility to retail, open space and public transport services for incumbent future residents.

The site on the corner of Dowie Drive and Glenroy Drive is already serviced by the existing Route 880 running along Glenroy Drive (i.e. Dobell Road). The site is also located approximately 250m from the completed Badgally Reserve.

*Page 63:*

*State Environmental Planning Policy 65 (SEPP 65) aims to improve the design quality of residential flat development in New South Wales.*

*This Policy applies to development for the erection of a new residential flat building, and the substantial redevelopment or the substantial refurbishment of an existing residential flat building. The Concept Plan does not envisage any residential flat buildings of three or more storeys. Were such development to occur, this SEPP would apply.*

Comment:

This acknowledges some potential for buildings of three or more storeys. However recent changes to the provisions of SEPP 65 are to the effect that SEPP65 applies to residential flat buildings and not seniors housing.

The Preferred Planning Report includes the following references of relevance (much the same):

*The concept plan includes construction of approximately 1,250 new dwellings and 100 seniors housing units;*

**S4.5:**

*Multi-unit housing in the form of seniors housing is proposed and is expected to have a maximum height of 2 storeys;*

**S4.6:**

*It is expected that the predominant built form will be detached and attached dwelling houses with some small lot housing forms and seniors units. The Concept Plan envisages five seniors housing developments each comprising approximately 20 to 25 units. Indicative locations for seniors housing is shown on the Concept Plan. These may change during detailed design in response to housing needs as assessed by Housing NSW. It is not expected that such multi-unit housing would exceed 2 storeys in height.*

**S4.10**

*The concept plan proposes integrated housing, seniors living units and new streets around the retail and community precinct to create a safer environment and more opportunities for effective surveillance as a result of the higher residential density.*

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Finally, Section 3B of Schedule 6A of the Act dealing with part 3A transitional arrangements states:

*(1) This clause applies to development (other than an approved project) for which a concept plan has been approved under Part 3A, before or after the repeal of Part 3A, and so applies whether or not the project or any stage of the project is or was a transitional Part 3A project.*

*(2) After the repeal of Part 3A, the following provisions apply (despite anything to the contrary in section 75P (2)) if approval to carry out any development to which this clause applies is subject to Part 4 or 5 of the Act:*

*(a) if Part 4 applies to the carrying out of the development, the development is taken to be development that may be carried out with development consent under Part 4 (despite anything to the contrary in an environmental planning instrument),*

*(b) if Part 5 applies to the carrying out of the development, the development is taken to be development that may be carried out without development consent under Part 4 (despite anything to the contrary in an environmental planning instrument),*

*(c) any development standard that is within the terms of the approval of the concept plan has effect,*

*(d) a consent authority must not grant consent under Part 4 for the development unless it is satisfied that the development is generally consistent with the terms of the approval of the concept plan,*

- (e) a consent authority may grant consent under Part 4 for the development without complying with any requirement under any environmental planning instrument relating to a master plan,*
- (f) the provisions of any environmental planning instrument or any development control plan do not have effect to the extent to which they are inconsistent with the terms of the approval of the concept plan,*
- (g) any order or direction made under section 75P (2) when the concept plan was approved continues to have effect.*

Therefore, both development applications need to establish general consistency with the Concept Plan approval.

### 3. Zoning and Planning Controls

The sites are zoned R2 Low Density Residential under the provisions of Campbelltown LEP 2015. Seniors housing is generally prohibited on land within this zone. However, their permissibility is provided here under the Concept Plan approval via the transitional arrangements outlined above. The developments would also be permissible under the provisions of the Seniors Housing SEPP 2004 (Housing for Seniors).

As part of the approved Concept Plan, the Claymore Urban Renewal Development Control Guidelines (DCG) (dated May 2012) were established, to guide future development within the Project area. The controls are slightly different to Council's standard building controls contained within its Sustainable City DCP and are generally intended for detached dwellings on new lots created by subdivision. The main DCG are:

- 4 metre setback to primary street;
- 2 metre setback to secondary street;
- 4 metre setback to rear;
- 0.9 metre setback to side;
- Maximum building height – 9.5 metres.

Recognising the 9.5m building height guideline, both proposals have been depicted with regard to that mark (refer to highlighted 9.5m line on proposal elevations at **Attachment 1**).

For the Dowie Drive complex, it is noted that the proposed complex generally achieves compliance with the 9.5m level, save some minor parapet and lift housing intrusions. However, all habitable floors are within the 9.5m guide.

For the Rosslyn Drive complex, Blocks A & D achieve full compliance but elements of Blocks B & C exceed the 9.5m level, particularly at the corner of Rosslyn Drive and Arkley Avenue. This zone of non-compliance is where Block B has a fourth storey proposed, to deal with the fall of the finished ground level. This design outcome seeks to maintain even floors across the complex without needing to step the floor levels internally, so that better access to multiple lifts is provided for the units. In the context of the site's superior amenity as well as the Concept Plan's desire for increased density around the future retail centre, this zone of non-compliance is not considered problematic or offensive.

### 3.1 Relevant provisions of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 – SEPPHS

**Part 3** of the SEPPHS contains various design requirements that are to be satisfied by any development application. These include:

**Clause 31** applies to the design of in-fill self-care housing and requires the consent authority, in respect of an application for in-fill self-care housing, to take into consideration the provisions of the Seniors Living Policy: Urban Design Guideline for Infill Development published by the Department of Infrastructure, Planning and Natural Resources in March 2004. This document contains a range of general design guides and a number of rules of thumb:

Site Planning and Design	<ul style="list-style-type: none"> <li>The proportion of site given over to landscaped area and deep soil should be increased in less urban areas, on large lots, and in areas already characterised by a high proportion of open space and planting.</li> </ul>
Impacts on streetscape	<ul style="list-style-type: none"> <li>Respond to council planning instruments that specify the character or desired character for an area.</li> <li>Where there is a consistent front setback alignment, new development should not encroach on the front setback.</li> <li>Driveways or basement car park entries should not exceed 25% of the site frontage.</li> <li>Garage doors should be set back a minimum of 1m behind the predominant building façade on both the street frontage and common driveways.</li> </ul>
Impact on neighbours	<ul style="list-style-type: none"> <li>Where side setbacks are less than 1.2m, a maximum of 50% of the development should be built to this alignment;</li> <li>The length of unrelieved walls along narrow side or rear setbacks should not exceed 8 metres;</li> <li>Living rooms of neighbouring dwellings should receive a minimum of 3 hours direct sunlight between 9 and 3 in mid winter.</li> <li>Solar access to the private open space of neighbouring dwellings should not be unreasonably reduced.</li> </ul>
Internal amenity	<ul style="list-style-type: none"> <li>separation of 1.2m should be achieved between habitable rooms and driveway or car parks of other dwellings which can be reduced if adequate screening is provided.</li> </ul>

**Clause 32** requires the consent authority to be satisfied that the proposed development demonstrates that adequate regard has been given to the principles set out in Division 2.

These principles are:

#### **33 Neighbourhood amenity and streetscape**

*The proposed development should:*

- (a) recognise the desirable elements of the location's current character (or, in the case of precincts undergoing a transition, where described in local planning controls, the



*desired future character) so that new buildings contribute to the quality and identity of the area, and*

*(b) retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity and any relevant heritage items that are identified in a local environmental plan, and*

*(c) maintain reasonable neighbourhood amenity and appropriate residential character by:*

*(i) providing building setbacks to reduce bulk and overshadowing, and*

*(ii) using building form and siting that relates to the site's land form, and*

*(iii) adopting building heights at the street frontage that are compatible in scale with adjacent development, and*

*(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and*

*(d) be designed so that the front building of the development is set back in sympathy with, but not necessarily the same as, the existing building line, and*

*(e) embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and*

*(f) retain, wherever reasonable, major existing trees, and*

*(g) be designed so that no building is constructed in a riparian zone.*

#### **34 Visual and acoustic privacy**

*The proposed development should consider the visual and acoustic privacy of neighbours in the vicinity and residents by:*

*(a) appropriate site planning, the location and design of windows and balconies, the use of screening devices and landscaping, and*

*(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.*

*Note. The Australian and New Zealand Standard entitled AS/NZS 2107-2000, Acoustics—Recommended design sound levels and reverberation times for building interiors and the Australian Standard entitled AS 3671-1989, Acoustics—Road traffic noise intrusion—Building siting and construction, published by Standards Australia, should be referred to in establishing acceptable noise levels.*

#### **35 Solar access and design for climate**

*The proposed development should:*

*(a) ensure adequate daylight to the main living areas of neighbours in the vicinity and residents and adequate sunlight to substantial areas of private open space, and*

*(b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation solar heating and lighting by locating the windows of living and dining areas in a northerly direction.*

*Note. AMCORD: A National Resource Document for Residential Development, 1995, may be referred to in establishing adequate solar access and dwelling orientation appropriate to the climatic conditions.*

#### **36 Stormwater**

*The proposed development should:*

*(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and*

(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.

### **37 Crime prevention**

The proposed development should provide personal property security for residents and visitors and encourage crime prevention by:

- (a) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins any such area, driveway or street, and
- (b) where shared entries are required, providing shared entries that serve a small number of dwellings and that are able to be locked, and
- (c) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.

### **38 Accessibility**

The proposed development should:

- (a) have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities, and
- (b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.

### **39 Waste management**

The proposed development should be provided with waste facilities that maximise recycling by the provision of appropriate facilities.

These are merits considerations that are addressed in the SEE accompanying the development applications and summarised above in terms of the suitability of the proposed sites for the development proposed having regard to location, relationship to adjoining sites and streetscape impacts.

### **Development Standards to be complied with:**

**Clause 40** provides that a consent authority must not consent to a DA unless the proposed development complies with the standards specified in this clause. Subclause **Clause 40(4)** contains development standards relating to height and states:

#### **(4) Height in zones where residential flat buildings are not permitted**

If the development is proposed in a residential zone where residential flat buildings are not permitted:

- (a) the height of all buildings in the proposed development must be 8 metres or less, and

**Note.** Development consent for development for the purposes of seniors housing cannot be refused on the ground of the height of the housing if all of the proposed buildings are 8 metres or less in height. See clauses 48 (a), 49 (a) and 50 (a).

- (b) a building that is adjacent to a boundary of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) must be not more than 2 storeys in height, and

**Note.** The purpose of this paragraph is to avoid an abrupt change in the scale of development in the streetscape.

Residential flat buildings are not permitted in the R2 residential zone. Notwithstanding this clause 50 enables approval to be granted for seniors housing notwithstanding the non-compliance with the height control. Further, the 8m height limit identified within is superseded by the 9.5m height level within the Design Control Guidelines approved as part



of the Concept Plan. Any provision of the SEPP that is inconsistent with the terms of approval of the Concept Plan does not have effect.

**Clause 50** contains standards that cannot be used to refuse development consent for self-contained dwellings. These are:

(a) **building height:** *if all proposed buildings are 8 metres or less in height (and regardless of any other standard specified by another environmental planning instrument limiting development to 2 storeys),*

(b) **density and scale:** *if the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,*

(c) **landscaped area:** *if:*

(i) *in the case of a development application made by a social housing provider—a minimum 35 square metres of landscaped area per dwelling is provided, or*

(ii) *in any other case—a minimum of 30% of the area of the site is to be landscaped,*

(d) **Deep soil zones:** *if, in relation to that part of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) that is not built on, paved or otherwise sealed, there is soil of a sufficient depth to support the growth of trees and shrubs on an area of not less than 15% of the area of the site (the deep soil zone). Two-thirds of the deep soil zone should preferably be located at the rear of the site and each area forming part of the zone should have a minimum dimension of 3 metres,*

(e) **solar access:** *if living rooms and private open spaces for a minimum of 70% of the dwellings of the development receive a minimum of 3 hours direct sunlight between 9am and 3pm in mid-winter,*

(f) **private open space** *for in-fill self-care housing: if:*

(i) *in the case of a single storey dwelling or a dwelling that is located, wholly or in part, on the ground floor of a multi-storey building, not less than 15 square metres of private open space per dwelling is provided and, of this open space, one area is not less than 3 metres wide and 3 metres long and is accessible from a living area located on the ground floor, and*

(ii) *in the case of any other dwelling, there is a balcony with an area of not less than 10 square metres (or 6 square metres for a 1 bedroom dwelling), that is not less than 2 metres in either length or depth and that is accessible from a living area,*

*Note. The open space needs to be accessible only by a continuous accessible path of travel (within the meaning of AS 1428.1) if the dwelling itself is an accessible one. See Division 4 of Part 4.*

(g) *(Repealed)*

(h) **parking:** *if at least the following is provided:*

(ii) *1 car space for each 5 dwellings where the development application is made by, or is made by a person jointly with, a social housing provider.*

*Note. The provisions of this clause do not impose any limitations on the grounds on which a consent authority may grant development consent.*

However, it is noted that developments that do not comply with these requirements can still be approved by the consent authority on their merits.

## **4. Concluding Comments**

The approved Concept Plan for the Claymore Renewal Project provides necessary flexibility for the construction of new Seniors Housing developments, in light of key design issues, the needs of seniors, the effective provision of lift access, encouraging more housing in appropriate locations and the evolution of these elements during the implementation phases of the Concept Plan. These key issues are identified in both the Concept Plan approval as well as the SEPPHS, and generally advocate for:

- Good access to public transport and retail services;
- Proximity to open space areas, particularly when they can offer passive surveillance;
- Appropriate bulk and scale given the building siting context;
- Good site planning and design;
- Streetscape presentation and relationship to neighbours;
- High quality amenity for future residents considering matters of cross ventilation, solar access, internal accessibility and car parking provision.

Both proposals are sited on locations that were identified for new Seniors Housing provision within the approved Concept Plan and have been developed in consultation with Council and the local community.

In our view, the detailed design of both proposals has achieved compliance with these abovementioned key design issues and are therefore worthy of Council's merit assessment.

Furthermore, it is open to Council to take the view that the development as proposed is generally consistent with the terms of approval of the Concept Plan approval for the reasons outlined above.

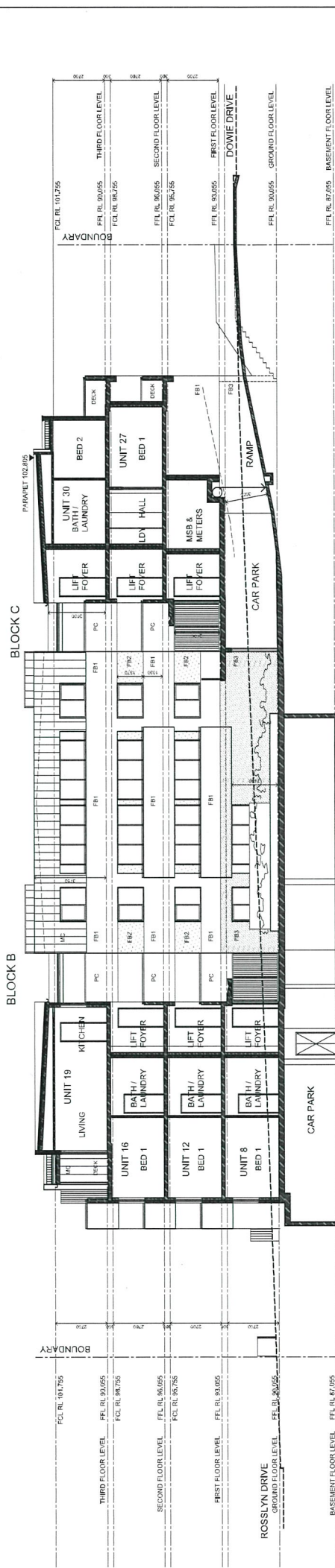
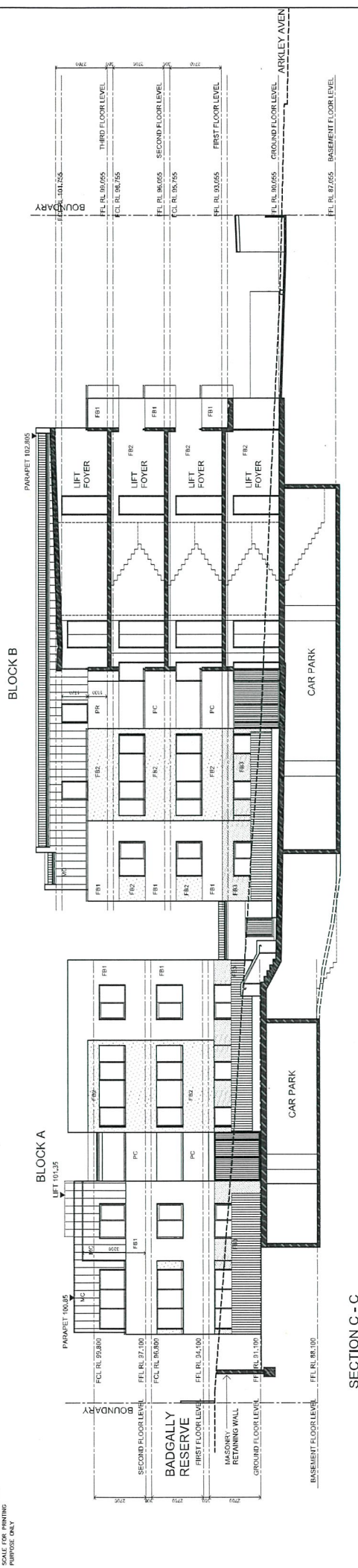


## **Attachment 1: 9.5m height level for proposed elevations**





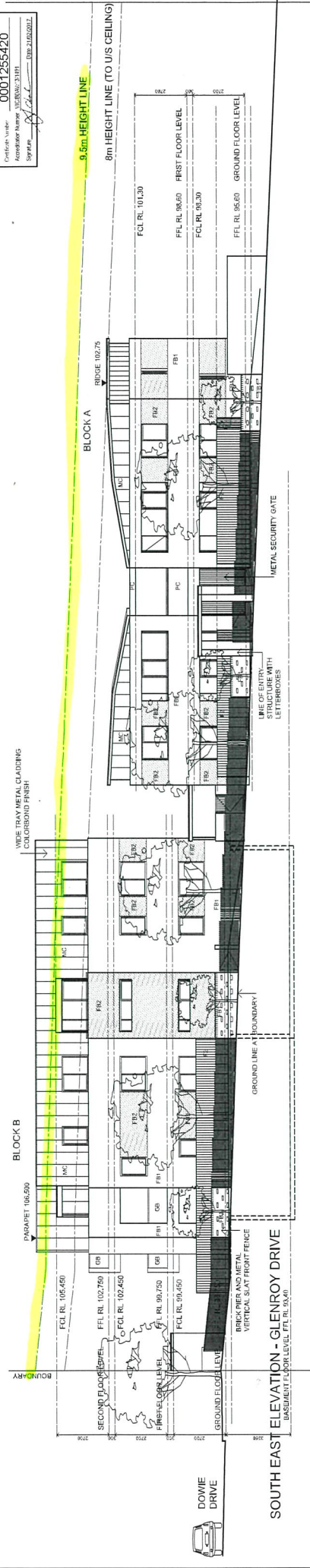
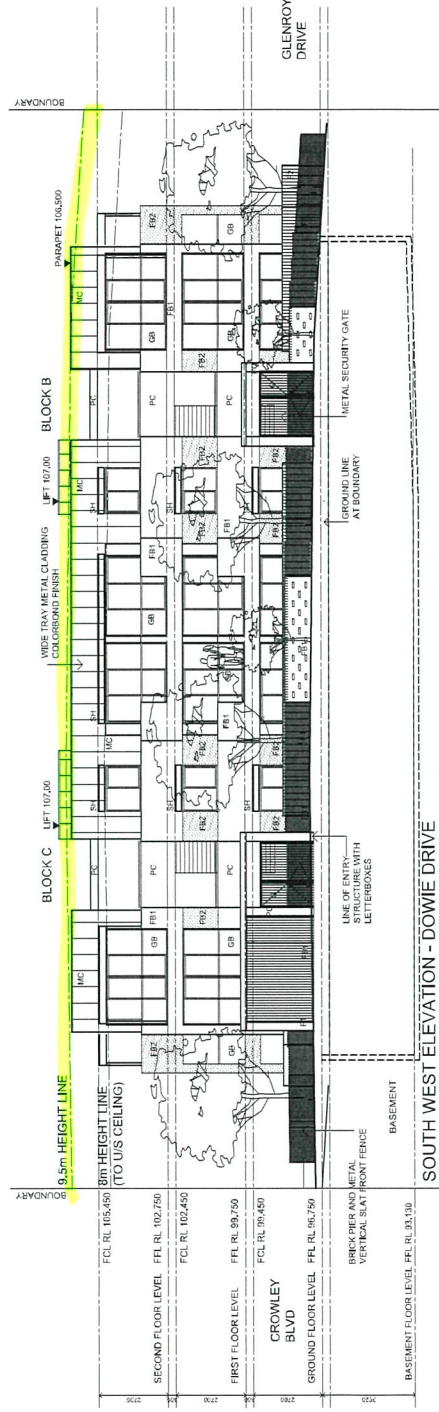
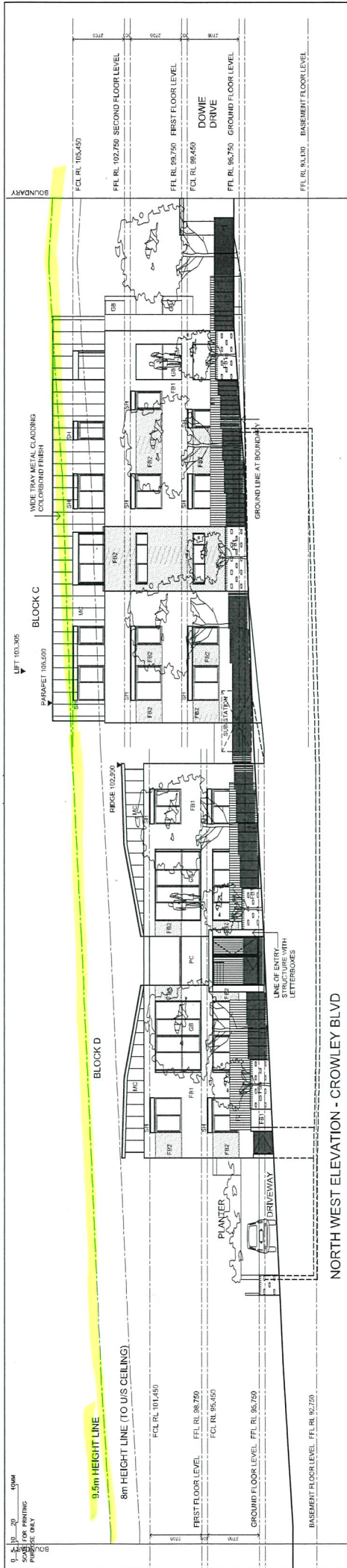




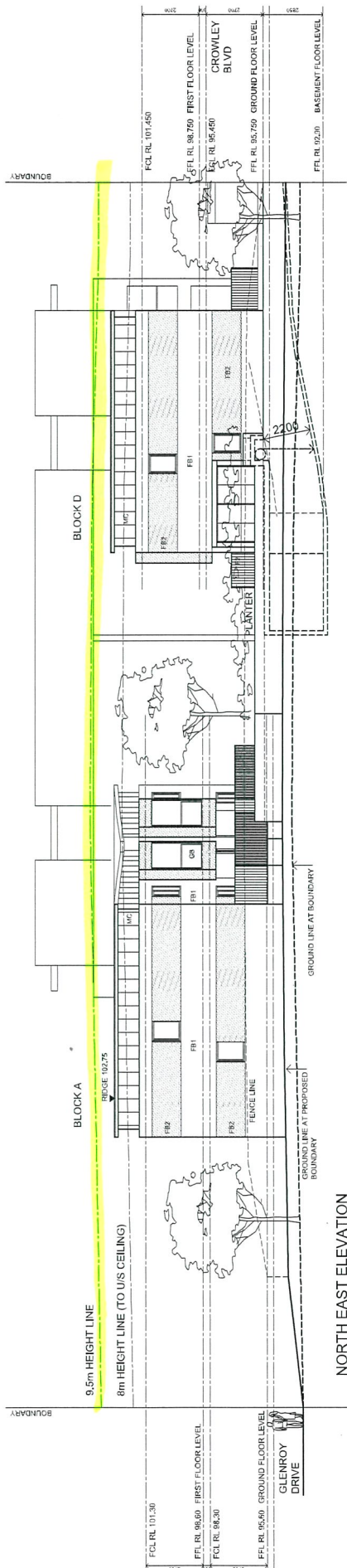
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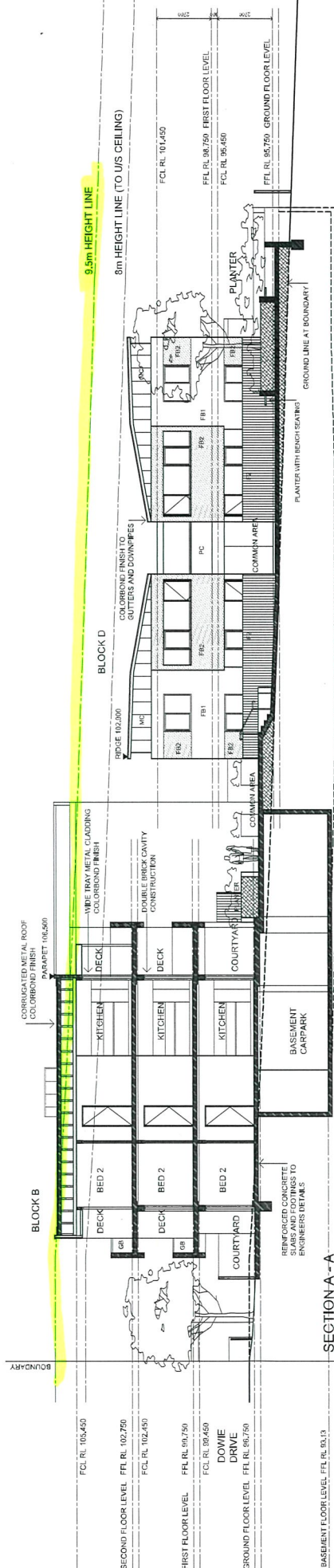




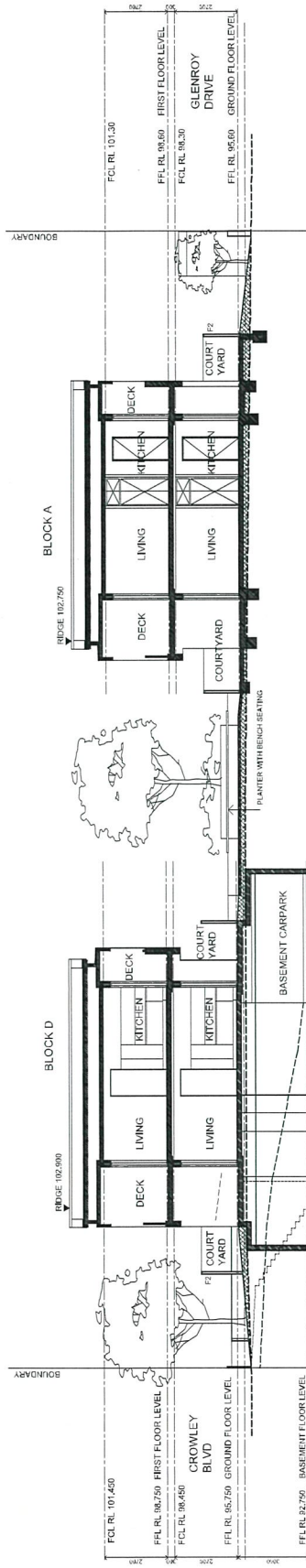




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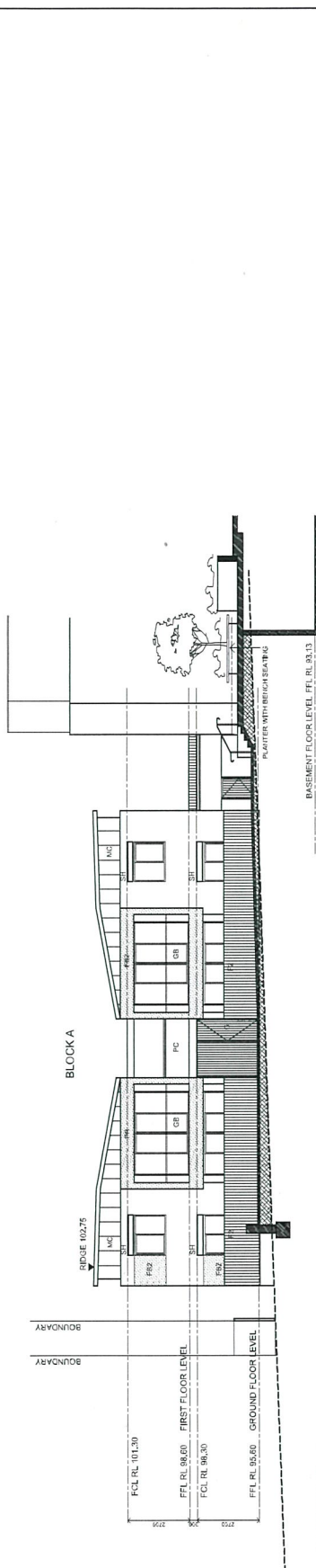


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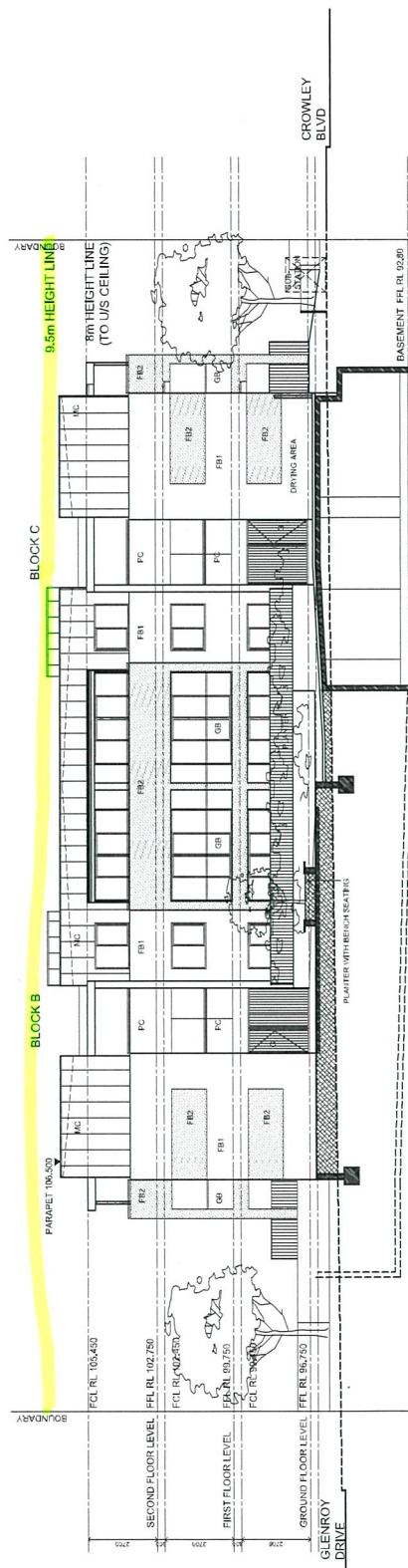


## SECTION B - B

 <b>Family &amp; Community Services</b> Land & Housing Corporation	 <b>Barry Risk &amp; Associates Pty Ltd</b> Suite 205, 2 Queen Street, Sydney, NSW, Australia, 2011 Phone: (61) (0) 8 533 9000 Fax: (61) (0) 8 533 9000 <a href="http://www.braclm.com.au">www.braclm.com.au</a>	D1-D12 11-12-13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-
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SECTION C - C



SECTION D - D