

STRATEGY > DEFINITION > DELIVERY > TRANSITION

CLAUSE 4.6 VARIATION – BUILDING HEIGHT



Gosford RSL
APP Corporation Pty Limited

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Clause 4.6 – Exceptions to Development Standards – Clause 4.3 of the Gosford Local Environmental Plan 2014 – Building Height

1. Overview

This report forms a variation request to the applicable height standard contained within the Gosford Local Environmental Plan 2014 (GLEP2014). It has been prepared with regard to the following considerations:

- Clause 4.6 of GLEP;
- The objectives of Clause 4.3 Height of Buildings, being the development standard to which a variation is sought.
- Relevant case law specifically the considerations for assessing development standards including *Wehbe v. Pittwater Council* [2007] NSWLEC 827 and *Four2Five Pty Ltd v Ashfield Council* [2015] NSW LEC.
- “Varying Development Standards: A Guide” published by the Department of Planning and Infrastructure (August 2011).

The variation request provides an overview of the development standard and the extent of variation proposed to the standard. The variation is then assessed in accordance with Clause 4.6 of the GLEP2014 and the relevant principles of the court rulings referred to above.

A variation to the strict application of the Height of Buildings development standard is considered appropriate for the proposed development as:

- The objectives of the GLEP2014 Height of Buildings control can, notwithstanding the numerical noncompliance, be achieved;
- The objectives of the GLEP2014 B5 – Business Development Zone are achieved notwithstanding the technical noncompliance;
- The development as proposed does not exceed the minimum residential amenity requirements for the site and as a result of the location of the site, known environmental constraints and development undertaken adjoining properties does not impact on the existing/potential residential amenity of adjacent developments in a manner greater than the impact of a compliant development;
- The public benefit of maintaining the development standard is not eroded by the proposal.

2. The Proposed Development:

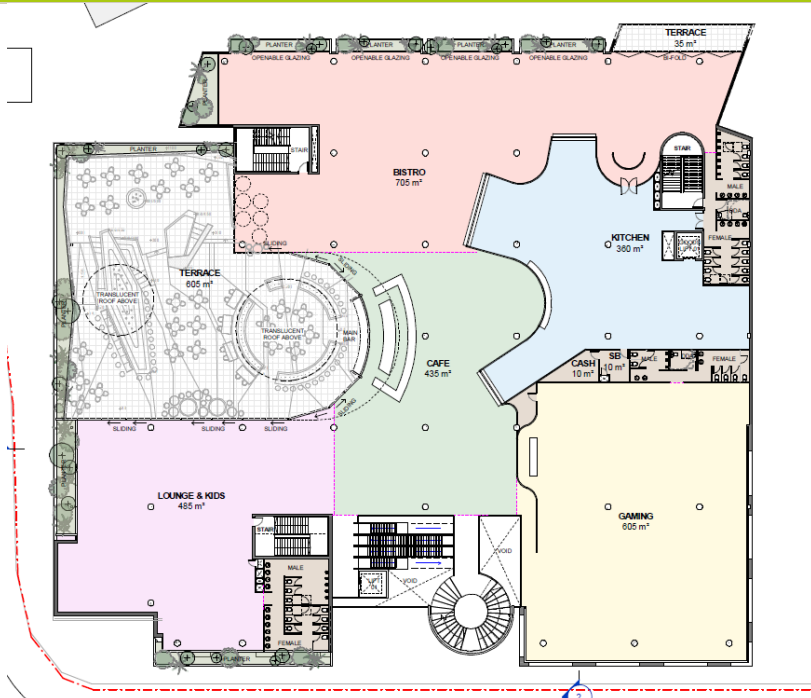
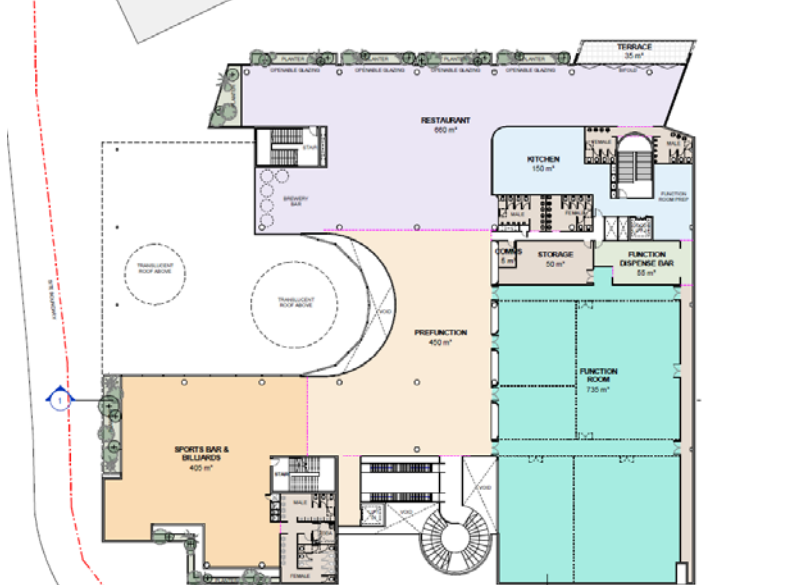
The proposed development comprises alterations and additions including :

- The extension of the existing registered club with a 6,740m² club building and 50 at grade parking spaces underneath the building. The floor space of the extension will comprise a mix of function, dining, lounge, gaming and bar facilities supported by 'back of house' space including kitchens, food and beverage dispensaries, storage and loading facilities, amenities, and administration;
- The demolition of the existing club building and motel reception;
- The construction of a carpark (154 spaces) with associated landscaped areas within the footprint of the existing club building;
- Facia signage;
- Ancillary landscaped areas; and
- Ancillary plant and equipment including but not limited to roof top air conditioning condensers, exhaust fans and refrigeration plant).

The following table provides a summary of the proposal per level:

Table 1 Details of the Development

Level	Mix of Use	Plan
Ground – GFA 1,170m ²	50 parking spaces, Storage and Loading Dock, Staff Administration and Amenities, Waste, Foyer and Museum	 The plan shows a complex layout of the ground floor. On the left, there is a 'PROPOSED CAR PARK' with 50 spaces. To the right of the car park is a large 'FOYER' (230 m²) and a 'MUSEUM' (40 m²). Further right are 'STAFF OFFICES + AMENITIES' (140 m²), 'RECEPTION' (20 m²), and 'IT' (25 m²). The top right section includes a 'REG ROOM' (100 m²), 'FREEZER' (25 m²), 'COOL' (20 m²), 'CELLAR' (15 m²), 'STORE' (15 m²), 'OFFICE' (15 m²), 'CLUB' (15 m²), 'SEC' (15 m²), 'LOBBY' (15 m²), 'WASTE' (45 m²), and 'LOADING' (45 m²). There are also 'STAIR' and 'ELEVATOR' symbols. The plan is color-coded: blue for offices/amenities, green for foyer/museum, and yellow for storage/loading areas. A note at the bottom says 'REFER TO LANDSCAPE DRAWINGS FOR DETAILS'.

Level	Mix of Use	Plan
First Floor – GFA 2,820m ²	Café, Bistro, Gaming, Lounge, Terrace, Patron Amenities, Back of House Kitchen,	 The First Floor plan shows a large open space divided into several functional areas. At the top is a long terrace (35 m²) with openable glazing. Below it is a large bistro (705 m²) and a kitchen (300 m²). To the left is a large terrace (605 m²) with a translucent roof above. In the center is a cafe (435 m²). To the right is a gaming area (605 m²) and a cash area (10 m²). At the bottom left is a lounge & kids area (485 m²). The plan also shows various service areas, restrooms, and a central staircase.
Second Floor – GFA 2,750m ²	Formal Dining Restaurant, Sports Bar, Function Room, Kitchen, Patron Amenities, Brewery, Ancillary Storage and Dispensary	 The Second Floor plan features a large restaurant (600 m²) at the top. Below it is a kitchen (150 m²). To the left is a sports bar & billiards area (400 m²). In the center is a prefunction area (400 m²). To the right is a function room (720 m²) and a function expense bar (55 m²). The plan also includes storage areas, restrooms, and a central staircase.

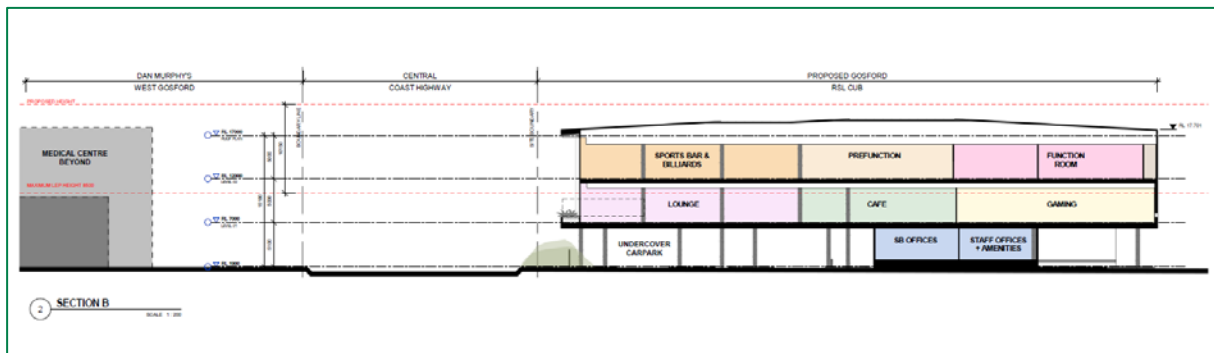
Level	Mix of Use	Plan
External	Landscaping, 154 parking spaces, service road	
External Signage	Signage forming part of western elevation. Approximate area of 16m ² .	 NOTE: GOSFORD RSL LOGO INDICATIVE ONLY 4. SIGNAGE - DETAILED WEST ELEVATION

The development will have a construction cost of \$31,807,000 ex GST.

The proposal will be constructed a height of RL20.550m (inclusive of plant area). The existing ground level in the development footprint stands at or around RL1.9m. This represents a maximum height of 18.65 metres. On completion the site will have a floor space ratio of approximately 0.4:1.

The adopted maximum height under the GLEP 2014 is 8.5 metres, indicating a maximum exceedance of 10.15 metres. Whilst this exceedance represents a substantial numerical departure, when considered in the context of the site and surrounds, zone objectives and desired future character for the locality, it stands as being reasonable and appropriate. The height of the building is shown in **Figure 1**.

Figure 1 – Height of Building



The development has been designed in a manner which responds to the surrounding built form and known environmental constraints, in particular flooding, which, regardless of the proposed land use, requires an elevated development footprint. This constraint is reflected in **Figure 2**.

Figure 2 – Flood Constraint



3. The Development Standard and Underlying Objective

This written request seeks a variation to a development standard under *Clause 4.3 Height of Buildings* of the Gosford LEP 2014. Clause 4.3 is replicated below:

(1) The objectives of this clause are as follows:

- (a) to establish maximum height limits for buildings,*
- (b) to permit building heights that encourage high quality urban form,*
- (c) to ensure that buildings and public areas continue to receive satisfactory exposure to sky and sunlight,*
- (d) to nominate heights that will provide an appropriate transition in built form and land use intensity,*
- (e) to ensure that taller buildings are located appropriately in relation to view corridors and view impacts and in a manner that is complementary to the natural topography of the area,*
- (f) to protect public open space from excessive overshadowing and to allow views to identify natural topographical features.*

The Gosford LEP 2014 adopts the standard definition of building height which is replicated below:

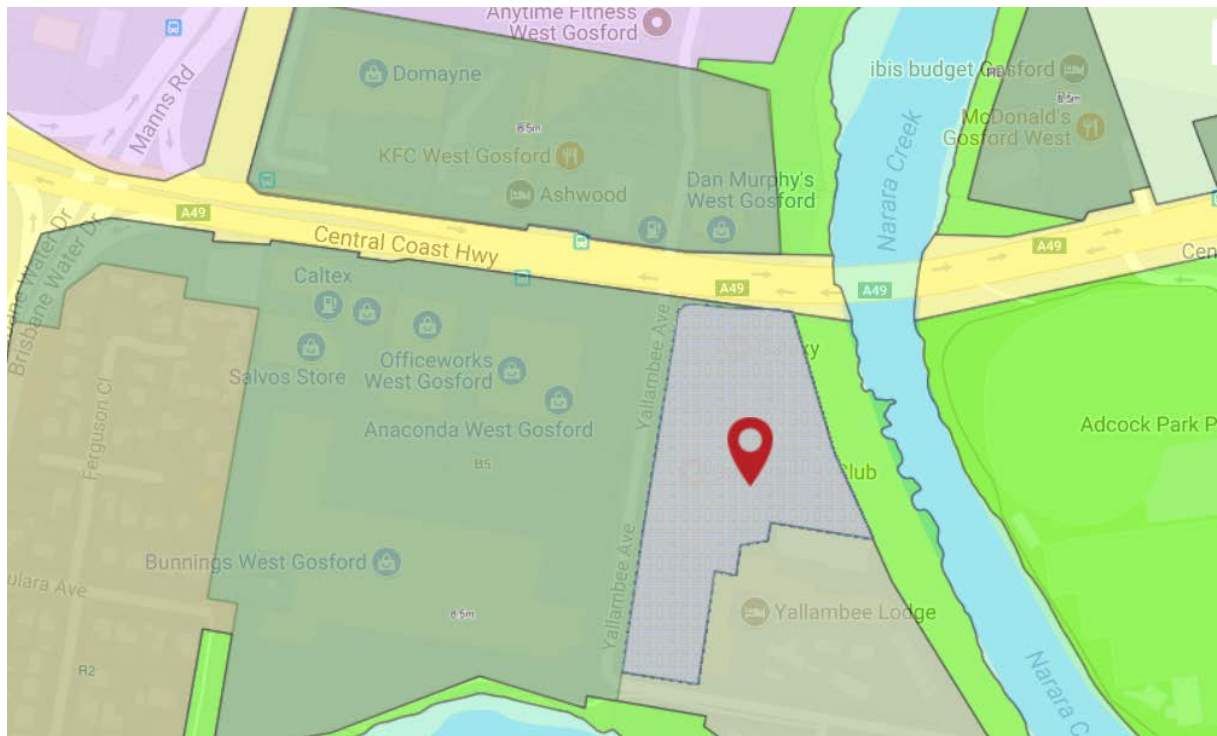
building height (or height of building) means:

- (a) in relation to the height of a building in metres—the vertical distance from ground level (existing) to the highest point of the building, or*
- (b) in relation to the RL of a building—the vertical distance from the Australian Height Datum to 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.

The relevant height of building map shows a maximum height of **8.5 metres** applying to the site. This is reflected in **Figure 3**.

Figure 3 – Height of Buildings Map



The planning control is a development standard affecting building height under clause 4.3 of the Gosford LEP 2014. Council may consider the variation to the maximum building height standard as the site is not excluded from consideration under clause 4.6 (8).

The maximum building height, is a numerical development standard capable of being varied under the provisions of Clause 4.6 of the Gosford LEP 2014.

The underlying objectives and purpose of the building height control are relevant to the proposed development. The proposed development is consistent with those objectives on the basis that the proposed building height will still results in a development which is compatible with the established and emerging scale of development (desired future character) within the visual catchment of the site and will sit comfortably with the future desired context of the site and immediate surrounds with no significant adverse impacts to adjacent properties, including but not limited to privacy or excessive overshadowing.

This is reflected in the below assessment.

4. Clause 4.6 Assessment

This section assesses the proposed variation to consider whether compliance with the Height of Buildings standard can be considered unreasonable or unnecessary in this case and whether there are sufficient environmental planning grounds to justify contravening the development standard.

Clause 4.6 provides flexibility to vary the development standards specified within the LEP where it can be demonstrated that the development standard is unreasonable or unnecessary in the circumstances of the case and where there are sufficient environmental grounds to justify the departure. Clause 4.6 states the following:

- (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:*
 - (a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and*
 - (b) that there are sufficient environmental planning grounds to justify contravening the development standard.*
- (4) Development consent must not be granted for development that contravenes a development standard unless:*
 - (a) the consent authority is satisfied that:*
 - (i) the applicant's written request has adequately addressed the matters required to be demonstrated by subclause (3), and*
 - (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*
 - (b) the concurrence of the Secretary has been obtained.*
- (5) In deciding whether to grant concurrence, the Secretary must consider:*
 - (a) whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and*
 - (b) the public benefit of maintaining the development standard, and*
 - (c) any other matters required to be taken into consideration by the Secretary before granting concurrence.*

Accordingly, justification is set out below for the departure from the building height control applicable under the GLEP2014. The purpose of the information provided is to demonstrate that strict compliance with the 8.5 metre standard detailed for the site under the GLEP2014 is unreasonable or unnecessary in the circumstances of this particular case.

The assessment is structured in accordance with the three matters for consideration identified in the Wehbe Land and Environment Court judgment:

1. *“The applicant must satisfy the consent authority that “the objection is well founded,” and compliance with the development standard is unreasonable or unnecessary in the circumstances of the case;*
2. *The consent authority must be of the opinion that granting consent to the development application would be consistent with the policy’s aim of providing flexibility in the application of planning controls where strict compliance with those controls would, in any particular case, be unreasonable or unnecessary or tend to hinder the attainment of the objects specified in s 5(a)(i) and (ii) of the Environmental Planning & Assessment Act 1979; and*
3. *It is also important to consider:*
 - a. *Whether non-compliance with the development standard raises any matter of significance for State or regional planning; and*
 - b. *The public benefit of maintain the planning controls adopted by the environmental planning instrument.”*

Consideration has also been given to the findings of the matter of *Four2Five Pty Ltd v Ashfield Council [2015] NSW LEC*, initially heard by Commissioner Pearson and upheld on appeal by Justice Pain. This case found that an application under Clause 4.6 to vary a development standard must go beyond the five (5) part test of *Wehbe V Pittwater [2007] NSW LEC 827* and demonstrate the following:

- *Compliance with the particular requirements of clause 4.6, with particular regard to the provisions of subclauses (3) and (4) of the LEP;*
- *That there are sufficient environment planning grounds, particular to the circumstances of the proposed development (as opposed to general planning grounds that may apply to any similar development occurring on the site or within its vicinity); and*
- *That maintenance of the development standard is unreasonable and unnecessary on the basis of planning merit that goes beyond the consideration of consistency with the objectives of the development standard and/or the land use zone which applies to site.*

An assessment of the proposed variation to the building height standard against the provisions of Clause 4.6 and the relevant case law is provided in the following sections

4.1 Compliance is Unreasonable or Unnecessary

In the *Wehbe* judgement Preston CJ set out five ways in which a variation to a development standard can be supported as follows:

1. ***The objectives of the standard are achieved notwithstanding non-compliance with the standard;***
2. ***The underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary;***

3. *The underlying object or purpose would be defeated or thwarted if compliance was required and therefore compliance is unreasonable;*
4. *The development standard has been virtually abandoned or destroyed by the Council's own actions in granting consents departing from the standard and hence compliance with the standard is unnecessary and unreasonable;*
5. *The zoning of the land is unreasonable or inappropriate so that a development standard appropriate for that zoning is also unreasonable and unnecessary as it applies to the land and compliance with the standard would be unreasonable or unnecessary. That is, the particular parcel of land should not have been included in the particular zone.*

This submission seeks to rely on **Consideration 1, 2 and 4**, which requires demonstration that the objectives of the building height standard can be achieved notwithstanding noncompliance is relevant in this case. The compliance of the proposed development with the objectives of the building height standard in Clause 4.3 of the GLEP2014 is demonstrated in Table 1 below:

Table 2 – Compliance with Building Height Objectives

Objective	Design Response
(a) to establish maximum height limits for buildings,	The proposal is not inconsistent with this objective. This request to vary the development standard questions the reasonableness of the adopted standard in the context of the land use zone (B5), established built form and desired future character.
(b) to permit building heights that encourage high quality urban form,	To achieve the required floor area to meet the club's operational objective, whilst adhering to the 8.5m height limit would, when taking into account flood levels, result in a single level development footprint within minimal scope to develop a high quality built form. Rather, a bland, low rise, yet compliant outcome would be a more likely outcome. This building would be flanked by a large expanse of car parking. The development would not be dissimilar to the existing development or other large format retailers situated in the locality. The proposal seeks to depart from the established urban form through establishing a presence at a gateway site. In this instance, the proposed 8.5 metre development standard does not encourage high

Objective	Design Response
	quality urban form and consequently a variation is required to satisfy this objective.
(c) to ensure that buildings and public areas continue to receive satisfactory exposure to sky and sunlight,	The site location, orientation and layout are such that the height of the proposed development will not resolve in any loss of natural light or exposure to the sky. This is reflected in the shadow diagrams which support the proposal.
(d) to nominate heights that will provide an appropriate transition in built form and land use intensity,	The location of the subject site is not in a location where a transition in built form is necessary to achieve an appropriate outcome. The site is situated within a business park precinct typified by large allotments, and buildings which generally exceed or meet the maximum building height. The larger sites provide scope to construct taller buildings which can be sited or orientated in such a way that considerations such as solar access, view loss and privacy can be effectively mitigated. The
(e) to ensure that taller buildings are located appropriately in relation to view corridors and view impacts and in a manner that is complementary to the natural topography of the area,	The subject site is not situated in a view corridor. Notwithstanding, the siting and orientation of the development is such that there will be no view loss as a result of the proposed variation to the height of buildings standard.
(f) to protect public open space from excessive overshadowing and to allow views to identify natural topographical features.	Whilst the site adjoins a public reserve fringing open space, it will be not subject to excessive overshadowing of this space. It will not compromise the function of this space, which has a primary function of protecting riparian land fringing Narara Creek.

Despite the technical departure from the relevant building height standard the proposed development remains consistent with the objectives of Clause 4.3 of the GLEP2014 and therefore it is demonstrated that strict compliance with the height of buildings standard in this instance is unreasonable and unnecessary. Further, it is considered that the proposal will remain consistent with the objectives of the R3 zone as summarised in Table 2 below

Table 3 – Compliance with Zone Objectives

Objective	Design Response
To enable a mix of business and warehouse uses, and bulky goods premises that require a large floor area, in locations that are close to, and that support the viability of, centres.	The proposed additional height will not compromise this zone objective.
To ensure that development is compatible with the desired future character of the zone.	In accordance with the Gosford DCP 2014, the subject site is situated in the <i>West Gosford Main Road Employment Area</i>. The desired future character for the locality is stated below: <i>These should remain mixed-use ribbons of larger scale and medium-impact employment or service activities plus showrooms that benefit from high-exposure, where the civic quality of prominent backdrops to Gosford City’s major arterial thoroughfares are enhanced by “greening” of the road frontages, and where new developments in leafy landscaped settings achieve a co-ordinated standard of presentation.</i> <i>Enhance the civic presentation of main road backdrops by siting buildings behind leafy front gardens and courtyards for parking or outdoor display of goods. Landscaping of street frontages should be co-ordinated, using hedges and rows of tall trees that are predominantly indigenous with elevated canopies that maintain the visibility of shopfronts, goods and commercial signs.</i> <i>Facing the major roads, promote improved standards of urban design for all new buildings. Locate offices or showrooms facing the street to provide animated facades that display indoor activity, with delivery entrances confined to side and rear facades. Avoid the appearance of uniform building heights facing any street or driveway frontage by stepping the line of roofs and parapets, or by using taller forms to emphasise prominent building corners and entrances.</i> <i>Disguise the scale and bulk of new buildings by applying a variety of materials and finishes to all front and side facades, including extensive windows that are shaded by balconies, verandahs or exterior sunshades, plus painted finishes over a mixture of masonry and sheet cladding, rather than expanses of plain masonry or metal sheeting. Roofs should be gently-pitched to minimise the height of ridges, flanked by wide eaves that disguise the scale of exterior walls.</i> <i>Civic presentation of road frontages should be supported by the co-ordination of building colour schemes and commercial signs. Signs should be limited in both size and number, attached to buildings in consistent locations but limited in height to create continuous horizontal bands along awnings or parapets, rather than covering an entire facade. Pylon</i>

Objective	Design Response
	<i>signs at the street frontage should complement the design of landscaped areas, and should be limited to one per property.</i> The proposed development responds appropriately to the desired future character of the locality. The additional building height does not compromise the ability of the development to remain consistent with the desired future character. In many ways the additional building height provides better scope for the built form to provide an improved standard of design that provides an animated façade that interacts with indoor activity. This would prove difficult to achieve with a single storey, yet compliant club building. This is evident in the below rendered image of the proposal. Clearly, a single level development would not allow for the same level of integration, when compared to the proposed development. 
• To provide and protect land for employment-generating activities.	The proposed additional building height will not compromise this zone objective.
• To encourage the location of business and other premises requiring large floor plates in appropriate locations to ensure they do not sterilise commercial or residential areas.	The proposed additional building height will not compromise this zone objective.

Objective	Design Response
To recognise the importance of business lands at Erina and locations supporting Gosford City Centre at West Gosford and Wyoming.	The proposed additional building height reinforces the role and function of West Gosford as employment generating business lands.
To recognise small isolated business and commercial areas located throughout Gosford.	The proposed additional height will not compromise this zone objective.
To recognise the range of service activities located in business areas that support business development.	The proposed additional height will reinforce the use of the site as a service activity which supports local business development.
To ensure that business areas are not sterilised by residential development.	The proposed additional height will reinforce the use of the site for a non residential development and will encourage the continued use of the land for non residential development.

Having particular regard to the desired future character, compliance under the circumstances would not improve the outcome. Rather it would merely result in a low rise development a larger ground floor development footprint with minimal opportunity to effectively integrate with the public domain or offer a high quality built form.

Further more, there are several examples of buildings which are of a height which exceed the 8.5m development standard in the curtilage of the site, yet are also subject to this development standard. These are reflected in the below figures:

Figure 4 – Surrounding Land Uses - West



Figure 5 – Surrounding Land Uses North



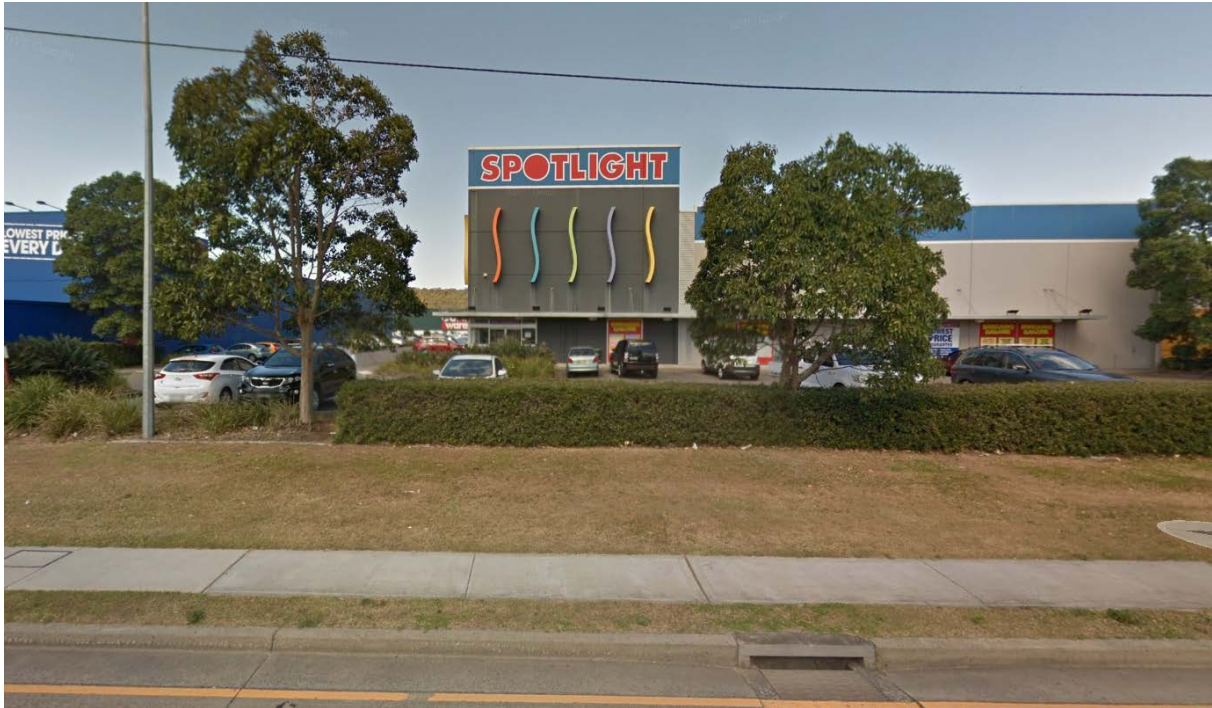
Figure 6 – Existing Bunnings



Figure 7 – Riverside Medical Centre



Figure 8 – Spotlight



Having regard to the additional matters in *Four2Five Pty Ltd v Ashfield Council [2015] NSW LEC*, the circumstances of the site, and how it relates to the adjoining land, the proposed variation that goes beyond the objectives of the development standard and/or the land use zone which applies to site.

As reflected in **Figure 3**, the land to the immediate east of the site contains an open space which is constrained by flooding which cannot be developed or built upon. Beyond Narara Creek, the land is also identified as having a high flood risk. This constraint would limit the type development that could occur on this land, and is unlikely to see further development which would be impacted by the proposed additional building. As such it is expected that a buffer will exist in perpetuity between the site and built form to the west, whilst the scale of the proposed development is not inconsistent with that found to the north and west of the development footprint. This is reflected in **Figures 4 to 8**.

As such development on the subject site is less likely to affect this land by way of overshadowing or privacy. The separation between built form will also provide visual relief. When taking these matters into consideration, it is considered that an increase in building height beyond that allowed on the subject site under Clause 4.3 will have minimal impact.

It is our view that to force compliance in the circumstance would be inconsistent with the inherent flexibility provided by Clause 4.6, thereby hindering the attainment of its objectives. In this regard, it is considered that strict adherence to the prescribed building height development standard would thwart the underlying objectives of the standard along with the overarching intent of the zone objectives. As such adherence is thought to be unreasonable and unnecessary in this instance.

4.2 Are there sufficient environmental planning grounds to justify contravening the development standard? Give details.

Yes, there are sufficient environmental planning grounds to justify the contravening development. These include:

- The variation does not result in adverse amenity impacts on adjacent land;
- The variation does not diminish the development potential of adjacent land;
- The variation is a result of a minor change in topography combined with a prescribed flood planning level;
- The development achieves suitable integration with the streetscape;
- The development does not require departure from any other development standard;
- The development provides all necessary supporting facilities and infrastructure within the site;
- The scale of existing and future development along Yallambee Avenue / Central Coast Highway is / will be comparable.
- The development provides landscaped areas of deep soil planting, courtyards and feature planting which further mitigate impact.

4.3 Is the objection well founded?

The proposed exception to the building height development standard will, in part, facilitate the delivery of a landmark development which will set a new standard for development in the locality.

As outlined in section 3.2, the development is consistent with the objectives of the development standard. Moreover, the proposal is consistent with the aims of the policy to allow flexibility in the application of development standards where to require compliance would hinder the objectives.

Compliance in this instance would not improve the outcome. Rather it would result in a poor built form which is inconsistent with the desired future character of the locality. It is our view that to force compliance in the circumstance would be antipathetic to the intent of the policy, thereby hindering the attainment of its objectives.

4.4 Would non-compliance raise any matter of significance for State or Regional Planning?

The non-compliance will not raise any matter of State or Regional Significance.

4.5 Is there a public benefit of maintaining the planning control standard?

The proposed exception to the building height development standard will, in part, facilitate the delivery of a land mark development which will improve the amenity of the surrounding area.

The development is considered to offer a positive environmental outcome (social, economic or biophysical). In particular the variation does not diminish the redevelopment potential or amenity of any adjoining land.

The development provides all necessary services and facilities required by Council's planning controls including landscaped area, parking, servicing and waste areas. In this regard the additional development area imposes no unreasonable pressure on the broader public to facilitate or support the development.

Based on the above and the matters outlined in this written request there is considered to be no public benefit in maintaining the planning control standard.

5. Conclusion

The development exceeds the maximum building height by 10.15 metres. This submission has found that a development strictly complying with the numerical standard would not significantly improve the amenity of surrounding land uses. Similarly, this submission has found that the additional height will not compromise the amenity of the surrounding land uses or result in a development which is inconsistent with the adopted policy framework.

In the context of the locality it would be unreasonable for strict compliance to be enforced, as the height and scale of the proposed development is compatible with surrounding existing and likely future development. Furthermore the development, as demonstrated in the SEE, is consistent with key development controls to define streetscape character and control bulk and mass such as setbacks, landscaped areas, building articulation and massing controls and the GDCP.

On the basis of reasons provided within this written request it is concluded that the objection is well founded as compliance with the standard is both unnecessary and unreasonable.



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