

STATEMENT OF ENVIRONMENTAL EFFECTS

190 CROATIA AVENUE, EDMONDSON PARK



8 FEBRUARY 2018
SA6795
PREPARED FOR CROATIA 88 PTY LTD



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Clare Brown
Senior Consultant	Erin Dethridge
Assistant Planner	Jarred Statham
Job Code	SA6795
Version	Final

TABLE OF CONTENTS

Executive Summary.....	i
1. Introduction	1
1.1. Overview	1
1.2. Structure of this Report.....	2
2. Site and Surrounding Locality.....	3
2.1. Subject Site.....	3
2.2. Surrounding Context.....	4
2.3. Transport Network	5
3. Background.....	6
3.1. Previous DA.....	6
3.2. Pre-Lodgement Discussions.....	6
4. Proposed Development	9
4.1. Overview	9
4.2. Subdivision.....	10
4.3. Built Form.....	11
4.4. Landscaping.....	12
4.5. Site Access and New Roads	12
5. Strategic Planning Assessment	14
5.1. A Plan For Growing Sydney	14
5.2. Draft Our Greater Sydney 2056.....	14
5.3. Draft Western City District Plan	14
6. Statutory Planning Assessment.....	16
6.1. Water Management Act 2000	16
6.2. State Environmental Planning Policy (Infrastructure) 2007	16
6.3. State Environmental Planning Policy 55 – Remediation of Land	17
6.4. State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	18
6.5. State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development	18
6.6. State Environmental Planning Policy (State Significant Precincts) 2005	19
6.7. Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment.....	20
6.8. Liverpool Local Environmental Plan 2008	21
6.9. Liverpool Development Control Plan 2008	24
7. Key Planning Considerations.....	27
7.1. Design and Built Form	27
7.2. External Amenity.....	27
7.3. Traffic and Parking.....	28
7.4. Acoustic Impacts.....	29
7.5. Social Impacts.....	29
7.6. Economic Impacts.....	31
8. Section 79C Assessment.....	32
8.1. Environmental Planning Instruments.....	32
8.2. Draft Environmental Planning Instruments	32
8.3. Development Control Plan	32
8.4. Planning Agreement	32
8.5. Regulations.....	32
8.6. Likely Impacts Of The Development.....	32

8.7.	Suitability of the Site for Development.....	32
8.8.	The Public Interest.....	33
9.	Conclusion	34
Disclaimer		35

Appendix A	Cost Summary Report
Appendix B	Survey Plan
Appendix C	Architectural Plans
Appendix D	Design Verification Statement
Appendix E	Clause 4.6 Variation Request
Appendix F	Statement of Heritage Impact
Appendix G	Landscape Report and Plans
Appendix H	Detailed Site Investigation
Appendix I	Geotechnical Report
Appendix J	Civil and Stormwater Concept
Appendix K	Flood Statements
Appendix L	BASIX Certificate
Appendix M	BCA Assessment Report
Appendix N	Acoustic Report
Appendix O	Traffic and Parking Assessment
Appendix P	Social Impact Comment
Appendix Q	Waste Management Plan
Appendix R	Public Utility Infrastructure Report

FIGURES:

Figure 1 – Proposed Layout Plan	1
Figure 2 – Aerial Photograph of Subject Site	3
Figure 3 – Photograph of Existing Dwelling, viewed from Croatia Avenue	4
Figure 4 – Edmondson Park Indicative Layout Plan	5
Figure 5 – Proposed Subdivision Plan	11
Figure 6 – Perspective Viewed from Corner of Croatia Avenue and Future McFarlane Road	12
Figure 7 – SEPP SSP	20

TABLES:

Table 1 – Supporting Documentation	2
Table 2 – Pre-DA Response.....	6
Table 3 – Numeric Overview of Proposal	9
Table 4 – Apartment Design Guide Key Numeric Requirements	18
Table 5 – LLEP 2008 Compliance Table.....	21
Table 6 – DCP 2008 Compliance Table	24
Table 7 – CPTED Assessment.....	30

EXECUTIVE SUMMARY

Overview

This Statement of Environmental Effects (**SEE**) has been prepared by Urbis Pty Ltd on behalf of Croatia 88 Pty Ltd (**the Applicant**) to support a Development Application (**DA**) to Liverpool City Council (**Council**) for the development of part 190 Croatia Avenue, Edmondson Park (**subject site**).

The subject site is a large parcel of land (2.023 ha) within the Edmondson Park urban release area close to the railway station, and has been earmarked for future residential development to accommodate Sydney's growing population. In accordance with the Edmondson Park Indicative Layout Plan provided at Part 2.11 of the Liverpool Development Control Plan 2008 (**LDCP 2008**), the site will accommodate high density housing, new roadways and land designated for open space.

Proposal

Due to the size and scale of the land parcel, the DA proposes a procedural subdivision of the site into four lots to allow development of the site to be undertaken in distinct stages. The initial stage will involve the redevelopment of the north-east corner of the site and has a proposed site area of 7,759.25sqm.

Specifically, the DA seeks development consent for the following:

- Demolition of existing structures at the site;
- Torrens title subdivision of the site into four lots;
- Construction of new on-site roads comprising Costello Lane and part Passendale Road (to be dedicated to Council);
- Earthworks to facilitate the construction of the proposed residential development, including excavation works to facilitate two basement levels;
- Construction of three residential flat buildings (Building A, Building B and Building C) which comprise;
 - A total of 135 dwellings;
 - Associated private open spaces including ground level courtyards and upper level balconies; and
 - Ground and rooftop communal open spaces.
- On-site car parking for 217 cars which will be accessed via two separate entry/exit driveways from Costello Lane.
- Pedestrian access from pathways adjoining Croatia Avenue, future McFarlane Road and future Passendale Road;
- Site landscaping works and an upgrade of site infrastructure and utilities; and
- Flood management works including the construction of temporary flood storage and head wall to discharge water to Maxwell Creek.

Planning Assessment

The proposed development has been assessed against the relevant environmental planning instruments and policies. In summary, the proposal should be supported as:

- **It is consistent with state and local strategic planning policies.**
The proposal positively contributes to state strategic requirements to deliver greenfield housing supply in the South West Growth Centre. It is also consistent with the desired future character as outlined in the LDCP 2008 for Edmondson Park.
- **The proposal satisfies the applicable local and state planning policies.**
The proposed development has been specifically designed in accordance with the relevant controls contained to the following local and State planning policies:
 - *State Environmental Planning Policy (Infrastructure) 2007*

- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy No. 65 - Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (State Significant Precincts) 2005*
- *Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment*
- *Liverpool Local Environmental Plan 2008 (LLEP 2008)*
- *Liverpool Development Control Plan 2008 (LDCP 2008)*

The negligible exceedances to the height of buildings development standard under LLEP 2008 has been justified within the clause 4.6 variation request.

- **The proposal is suitable for the site.**

In accordance with the draft Sydney Region Plan prepared by the Greater Sydney Commission, an additional 184,500 homes will be required within the Western City District by 2036 to support 464,000 additional people. The proposal will help deliver a portion of these additional dwellings in a location that is highly accessible by public and private transport.

- **The proposal is in the public interest.**

The proposal includes the construction of a high quality residential development providing active frontages to Croatia Avenue and the proposed new roadways. The proposal will facilitate the delivery of 135 additional dwellings within the Edmondson Park urban release area and the wider Liverpool local government area (**LGA**). Further, the proposal promotes sustainable outcomes, as it incorporates a range of energy efficient design solutions and provides new housing near a railway station, thereby encouraging the use of sustainable transport.

- **The proposal will not unreasonably impact on the amenity of surrounding properties.**

The proposal will not result in any unacceptable impacts on surrounding properties and the wider public domain.

The proposal represents a sound development outcome that is consistent with the provisions of the current planning controls and the future vision for the site and locality.

1. INTRODUCTION

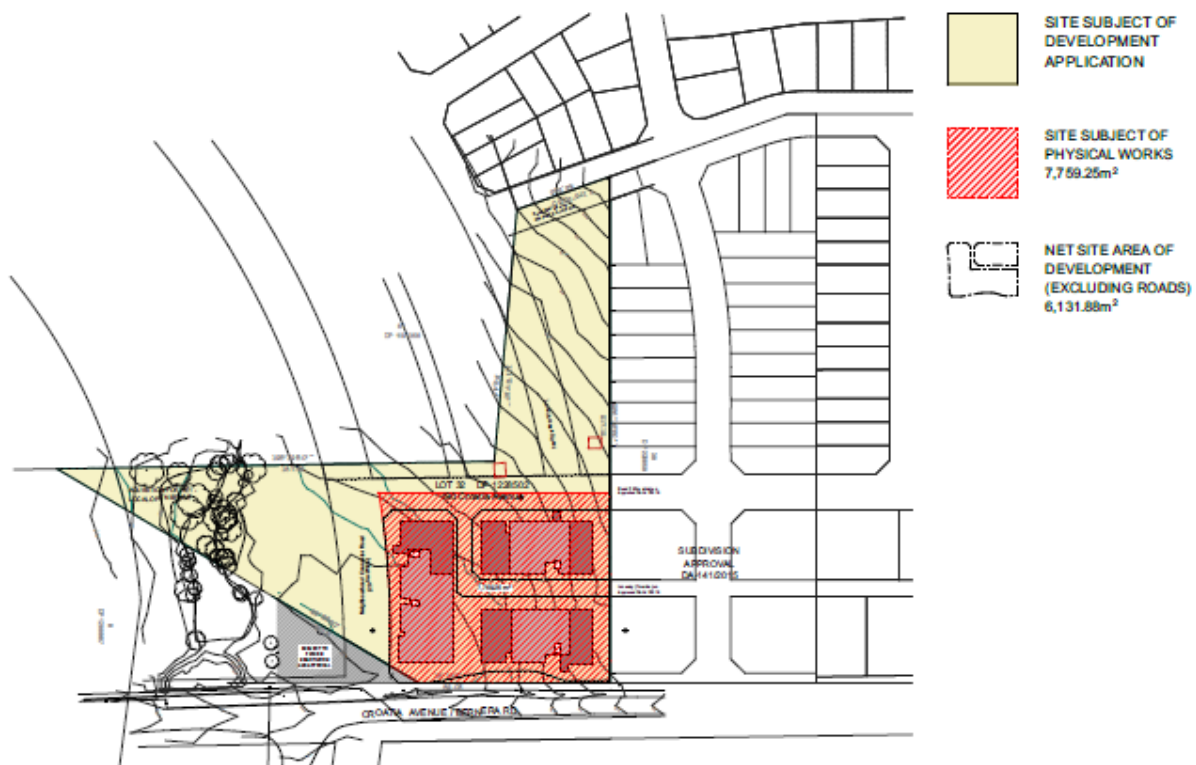
1.1. OVERVIEW

This Statement of Environmental Effects (**SEE**) has been prepared on behalf of Croatia 88 Pty Ltd (**the applicant**) to support a development application (**DA**) to Liverpool City Council (**Council**) for the development of part 190 Croatia Avenue, Edmondson Park (**subject site**).

The subject site is a large parcel of land (2.001 ha) within the Edmondson Park urban release area close to the railway station, and has been earmarked for future residential development to accommodate Sydney's growing population. Due to the size of the land parcel, the DA proposes a procedural subdivision of the site into four lots to allow development of the site to be undertaken in distinct stages, refer **Figure 1**.

It is noted that the architectural plans accompanying the DA identify roadworks, a small area of private open space and landscaping that extend beyond the site boundary in the southern-east corner, on land legally described as Lot 8 in DP1200987. Discussions with the land owner, Transport for NSW, are ongoing and therefore this land has been excluded from the site area for the purposes of the DA.

Figure 1 – Proposed Layout Plan



Source: Mosca Pserras Architects

The initial stage of development will involve the redevelopment of the north-eastern corner of the site for the purposes of three residential flat buildings comprising 135 dwellings and basement car parking, and the construction of new internal roads. A full description of the proposed development is included in **Section 4** of this report.

The estimated cost of works is \$36,550,000 including GST as calculated in accordance with clause 245N(1) of the *Environmental Planning and Assessment Regulation 2000* and detailed in the Cost Summary Report at **Appendix A**. As the cost of works exceeds \$20 million, the DA is submitted to Council for assessment and determination by the Sydney Western City Planning Panel.

1.2. STRUCTURE OF THIS REPORT

This SEE is structured in the following manner:

- A description of the site context, including identification of the subject site, existing structures on the site, and surrounding development.
- A description of the planning framework and pre-lodgement consultation with Council.
- Detailed description of the proposed development.
- Assessment of the proposed development with the relevant environmental planning instruments and policies and relevant matters under section 79C of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*.
- Identification and assessment of the key issues relevant to the proposed development.

This report has been prepared by Urbis based on the following inputs from the project team detailed in **Table 1**.

Table 1 – Supporting Documentation

Deliverable	Consultant	Appendix
Cost Summary Report	Archi-QS	Appendix A
Survey Plan	SDG	Appendix B
Architectural Plans	Mosca Pserras Architects	Appendix C
Design Verification Statement	Mosca Pserras Architects	Appendix D
Clause 4.6 Variation Request	Urbis	Appendix E
Statement of Heritage Impact	Artefact	Appendix F
Landscape Report and Plans	Greenland Design	Appendix G
Detailed Site Investigation	EI Australia	Appendix H
Geotechnical Report	Geotechnique	Appendix I
Civil and Stormwater Concept	SGC	Appendix J
Flood Statements	SGC	Appendix K
BASIX Certificate	Building Sustainability Assessments	Appendix L
BCA Assessment Report	BCA Logic	Appendix M
Acoustic Report	Acouras	Appendix N
Traffic and Parking Assessment	Varga Traffic Planning Pty Ltd	Appendix O
Social Impact Comment	Mosca Pserras Architects	Appendix P
Waste Management Plan	Mosca Pserras Architects	Appendix Q
Public Utility Infrastructure Report	AT&L	Appendix R

2. SITE AND SURROUNDING LOCALITY

2.1. SUBJECT SITE

The subject site is known as 190 Croatia Avenue, Edmondson Park and is legally described as Lot 32 in DP 1228502. The site is located within the Liverpool LGA.

The site shown in red in **Figure 2** is irregular in shape and has an approximate site area of 2.001 ha. The overall frontage to Croatia Avenue to the east is 85m and the overall frontage to Somme Avenue to the west is 44m.

Notwithstanding the proposed subdivision of the broader site, this DA proposes the redevelopment of the north-eastern corner of the site only (shown in blue in **Figure 2**). It is noted that flood management works are proposed outside this area as detailed in the Flood Storage Compensation Plan at **Appendix J**.

Figure 2 – Aerial Photograph of Subject Site



Source: Nearmap and Urbis

2.1.1. Existing Development

The site primarily consists of vacant grassland that has been previously used for market gardening activities and contains:

- Vacant single storey detached residential dwelling of brick construction (refer **Figure 3**);
- Multiple ancillary agricultural sheds; and
- Vehicular access point into the site from Croatia Avenue.

The site has access to services (i.e. water, sewer, electricity) as outlined in the Public Utility Infrastructure Report provided at **Appendix R**.

Figure 3 – Photograph of Existing Dwelling, viewed from Croatia Avenue



Source: Google Maps

2.1.2. Existing Vegetation

A cluster of advanced trees is located within the southern portion of the broader site, well away from the proposed development area. In accordance with the Edmondson Park Indicative Concept Plan outlined in the LDCP 2008, the southern portion of the site will be dedicated as open space for a riparian corridor.

Some trees are also located along the eastern edge of the site adjoining Croatia Avenue and grassed open areas are located throughout the entire site.

2.1.3. Heritage

Built Heritage:

The site is not identified as a heritage item or located within a heritage conservation area. In addition, the site is not located near items of heritage significance or heritage conservation areas. The Statement of Heritage Impact provided at **Appendix F** notes that the site *“is unlikely to contain archaeological remains that reach the threshold of local significance”*.

Aboriginal Heritage:

An AHIMS Search was undertaken, which confirmed no Aboriginal sites or places are recorded on or within 50m of the site. This is also confirmed within the Statement of Heritage Impact at **Appendix F**.

2.2. SURROUNDING CONTEXT

The site is located within the suburb of Edmondson Park, approximately 33km from Sydney Central Business District (CBD) and 7km from the Liverpool CBD. The site is within an urban release area currently undergoing significant change from a rural setting to a residential environment incorporating a mix of housing types, including higher density residential development.

The land immediately surrounding the site is described as follows:

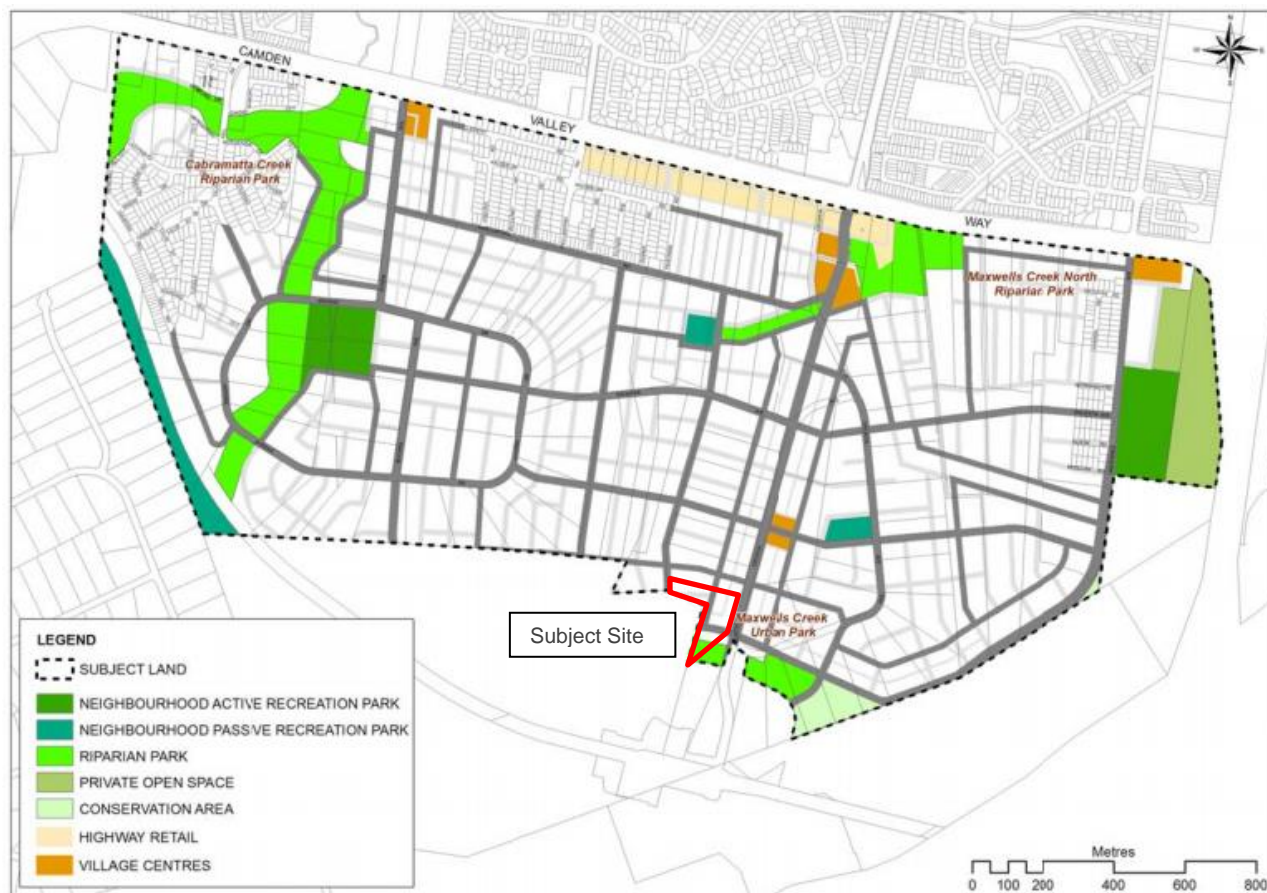
- **North:** Directly adjacent to the north of the site is 200 Croatia Avenue, Edmondson Park, which is currently vacant semi-rural land. Development Consent DA-141/2015 was approved by Council on 9 November 2015 and allows the *“subdivision of 1 Lot to Create 25 Torrens Title Residential Lots and 4 Residual Lots with Demolition and Road Construction.”* At the time of preparing this SEE, construction works under the consent had not commenced.

Further north, land is being developed for a range of residential developments, including detached dwellings and residential flat buildings.

- **East:** Directly adjacent to the east is Croatia Avenue. Further east are multiple large residential lots that are yet to be developed.

- **South:** Land directly to the south of the site forms part of the Edmondson Park South precinct, which includes the Edmondson Park railway station, a future Town Centre and variety of residential, retail, commercial, open space and recreation uses.
- **West:** To the west of the site is semi-rural land currently undergoing redevelopment to facilitate a range of residential dwellings and supporting roads.

Figure 4 – Edmondson Park Indicative Layout Plan



Source: LDCP 2008 and Urbis

2.3. TRANSPORT NETWORK

The site is highly accessible by public transport based on its proximity to Edmondson Park railway station. The station is located on the T2 Inner West and South Line which provides direct services to Grandville, Liverpool and Central.

As noted in correspondence received by the applicant from Council (dated 25 October 2017), part of the frontage to Croatia Avenue has been compulsory acquired by Council to accommodate a new bus stop. The location of the bus stop and acquisition of land has been incorporated in the design of the proposed development, with setbacks proposed from the new boundary alignment.

There is currently one bus service (Route 869), which traverses directly past the site along Croatia Avenue and operates between Ingleburn and Liverpool via Edmondson Park. It is expected that as the area is further redeveloped, additional services and routes will be introduced. As noted on Council's Possible Public Transport Route Plan included in Part 2.11 of the LDCP 2008, Croatia Avenue will become the 'Main Bus Route' through the area.

3. BACKGROUND

3.1. PREVIOUS DA

On 28 June 2016, DA-584/2016 was lodged with Council and sought approval on site for the following:

“procedural subdivision, construction of a laneway and temporary access road, demolition of existing structures in-order to construct an 8-storey residential flat building. The development incorporates a total of 94 residential units and a total of 113 car parking spaces within a basement level.”

This application was withdrawn from Council on 16 March 2017.

3.2. PRE-LODGEEMENT DISCUSSIONS

On 21 June 2017, a pre-DA meeting was held with Council officers to discuss a preliminary scheme for the site. Several planning considerations were raised by Council within this meeting, which have been considered and informed the final design of the development that is considered most suitable for the site.

The table below provides a summary of the issues discussed during the pre-lodgement meeting and the way in which these matters have been addressed.

Table 2 – Pre-DA Response

	Issue	Response	Satisfied
1.	It is recommended that a facilitating subdivision application be lodged to subdivide the portion of land associated with the proposed residential flat building as the first stage.	This DA includes the subdivision of the site into four lots, refer Figure 5 . Lots 1 and 2 will accommodate the proposed development, Lot 3 includes the proposed roads to be dedicated to Council and Lot 4 includes the balance of land for future subdivision and redevelopment.	Yes
2.	The local street through the middle of the site is required to be dedicated to Council. As such, the proposal to connect private car parking basements under the local road cannot be supported.	The proposal has been amended and no longer includes a connected basement under the laneway.	Yes
3.	Any future development application shall ensure that a mix of apartment types is provided in accordance with Part 2.11 of the Liverpool Development Control Plan 2008. It is noted that the preliminary design does show a mix of 1, 2 and 3-bedroom units.	The proposal includes a mix of apartments in accordance with LDCP 2008.	Yes
4.	An Acoustic Report should be prepared that anticipates the future noise conditions around the site and informs the design and use of materials in the proposed development. Consideration should be given to Clause 87 of <i>State Environmental Planning Policy (Infrastructure) 2007</i> .	An Acoustic Report has been prepared that supports the DA, refer Section 6.2 and Appendix I.	Yes
5.	The DA should include a Safer By Design (CPTED) Report that addresses the principles of	The proposed development has been specifically designed to incorporate the Crime Prevention Through Environmental Design	Yes

	Issue	Response	Satisfied
	public safety in the context of a locality in transition.	(CPTED) principles. This has been addressed in detail within Section 7.4 of this SEE.	
6.	Any future DA shall demonstrate that appropriate access to the development will be provided. It is recommended that consultation with the owners of neighbouring properties is undertaken to discuss the possibility of temporary access from the northern side of the site.	The proposed access arrangements are discussed in Section 4.5 .	Yes
7.	An Aboriginal Heritage Information Management System (AHIMS) search shall be completed to ensure there are no Aboriginal objects of significance on the site.	The AHIMS search was undertaken as part of the Statement of Heritage Impact (refer Appendix F) and confirms there are no Aboriginal objects of significance on the site.	Yes
8.	A Phase 1 Contamination Report shall be submitted with any future DA. Should the site be found to be contaminated, a Remedial Action Plan shall be submitted.	A Detailed Site Investigation accompanies the DA (refer Appendix H). A Remedial Action Plan is not required as part of the proposed development.	Yes
9.	Any future DA shall demonstrate that the floor space ratio (FSR) of the proposal complies once the site has been subdivided.	Applying the proposed gross floor area to the development area of the site, the proposal complies with the 1.5:1 FSR. This is discussed in more detail in Section 6.8 .	Yes
10.	The site can be developed as per Council's design report and concept plans (Design for the Modification of Creeks in Edmondson Park, Floodmit and Storm Consulting, June 2014).	The flood management requirements outlined in Council's pre-lodgement advice are address in the Civil and Stormwater Concept at Appendix J and Flood Statements at Appendix K .	Yes
11.	A stormwater assessment shall be undertaken for the management of stormwater in the post development scenario.	A Civil and Stormwater Concept has been prepared and is included at Appendix J .	Yes
12.	Water quality treatment works shall be designed using MUSIC modelling software.	The Stormwater Concept Report includes the MUSIC modelling undertaken for the proposed development.	Yes
13.	On-site detention (OSD) is required to be provided and must be within common property and accessible from the street.	Two OSD tanks are proposed within the common areas, with access from the street.	Yes
14.	The application shall be supported by a Traffic Statement.	A Traffic and Parking Assessment has been prepared DA (refer Appendix O).	Yes
15.	The application is to be supported by a geotechnical report.	A Geotechnical Report has been prepared (refer Appendix I).	Yes

16.	The application is to be accompanied by a subdivision concept plan.	As mentioned previously, the DA includes the subdivision of the site into four lots. A subdivision plan is included in the architectural plan package at Appendix C .	Yes
17.	The subject layout shall be in general accordance with the LDCP.	The layout of site including the construction of Passendale Road and Costello Lane is consistent with the LDCP.	Yes
18.	Any request for works in kind shall form part of the DA.	The proposed works in kind include the construction and dedication of new roadways through the site and are discussed at Section 4.5 .	Yes

4. PROPOSED DEVELOPMENT

4.1. OVERVIEW

The DA seeks development consent for the development of part 190 Croatia Avenue, Edmondson Park for the following works:

- Demolition of existing structures at the site;
- Torrens title subdivision of the site into four lots;
- Construction of new on-site roads comprising Costello Lane and part Passendale Road (to be dedicated to Council);
- Earthworks to facilitate the construction of the proposed development, including excavation works to facilitate two basement levels;
- Construction of three residential flat buildings (Building A, Building B and Building C) which comprise;
 - A total of 135 dwellings;
 - Associated private open spaces including ground level courtyards and upper level balconies; and
 - Communal open spaces which each contain vegetable planters, seating and a pergola.
- On-site car parking for 217 cars which will be accessed via two separate entry/exit driveways from Costello Lane (to be constructed as part of this DA);
- Pedestrian access from pathways adjoining Croatia Avenue, future McFarlane Road and future Passendale Road;
- Site landscaping works and an upgrade of site infrastructure and utilities; and
- Flood management works including the construction of temporary flood storage and head wall to discharge water to Maxwell Creek.

The proposed development has many aspects that are covered in detail in the Architectural, Civil, Stormwater and Landscaping Plans annexed to this SEE.

Key numeric aspects of the proposal are provided at **Table 3** and the various components of the proposed development are described in the following sections.

Table 3 – Numeric Overview of Proposal

Parameter	Proposed			
Total Site Area	2.001 ha			
Development Site Area	7,759.25sqm			
Total Gross Floor Area (GFA)	11,638sqm			
Floor Space Ratio (FSR)	1.5:1			
Height (storeys and maximum in metres)	Six storeys and 22.21m			
Apartments:	Building A	Building B	Building C	Total
• 1 Bedroom	10	10	11	31
• 2 Bedroom	23	40	23	86
• 3 Bedroom	6	6	6	18

Parameter	Proposed			
Total	39	56	40	135
Car Parking Spaces:				
<ul style="list-style-type: none">Resident	<ul style="list-style-type: none">183			
<ul style="list-style-type: none">Visitor	<ul style="list-style-type: none">34			
Total	<ul style="list-style-type: none">217			
Landscape/Deep Soil Area	1563sqm (25%)			
Communal Open Space Areas	1,625sqm (26.5%)			

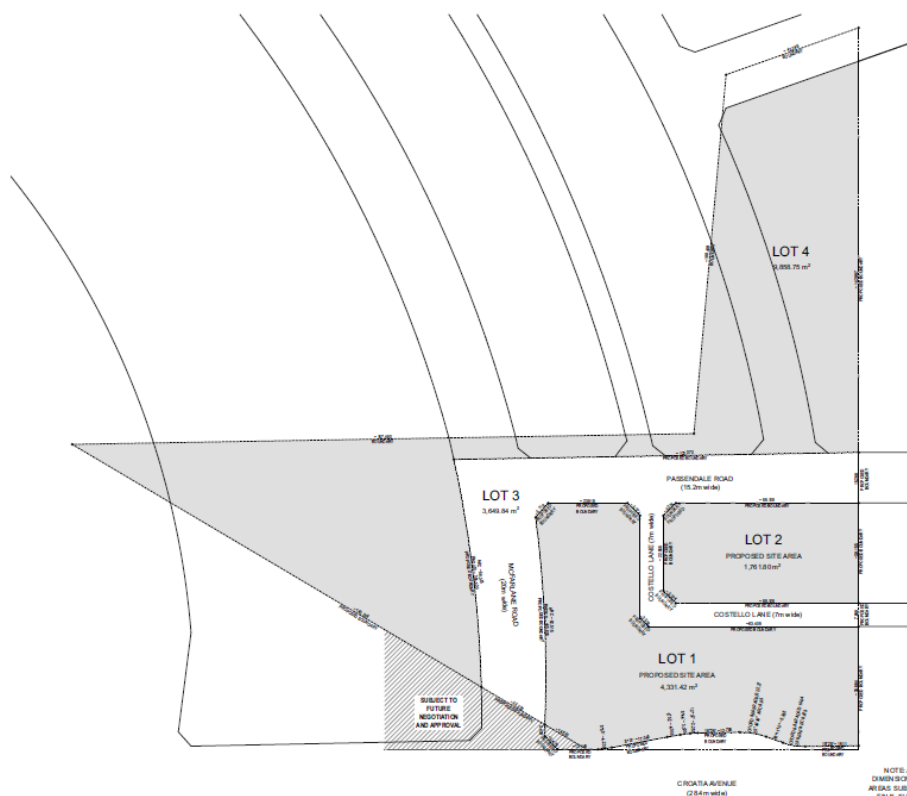
4.2. SUBDIVISION

The proposal seeks consent to subdivide the site into four lots, as follows:

- Lot 1 – Buildings A and B;
- Lot 2 – Building C;
- Lot 3 – Proposed roads: McFarlane Road (Connector Road), Passendale Road (Neighbour Road) and Costello Lane (Laneway); and
- Lot 4 – Residual lot available for future development.

Proposed subdivision works are to be in accordance with the Subdivision Plan provided at **Appendix C** and reproduced in **Figure 5**.

Figure 5 – Proposed Subdivision Plan



Source: Mosca Pserras Architects

4.3. BUILT FORM

The design, scale and built form of the proposed development was carefully considered by Mosca Pserras and provides the following outcomes:

- “The proposed development frames Croatia Avenue and provides a transition from the town centre to the lower density residential areas.
- The development will engage, invigorate and generate increased pedestrian activity.
- Architectural modelling with alternating panels and balcony articulation will create patterns of light and shadow to enhance the façade and reduce the perceived bulk of any building mass.
- The proposed density will benefit the public by enabling the development to better respond to the future character of the town centre. The yield will allow for a high-quality design outcome.
- Street planting will be provided in accordance with guidelines and specifications of Liverpool City Council and enhanced through additional planting within the site.
- Communal open space will provide passive and active recreational opportunities.
- The interface to the street has been carefully designed to ensure safe access to and egress from the building ensuring direct sight lines to the residential lobby from the street.
- Apartments and open gallery walkways overlook communal open spaces providing passive surveillance to improve safety; the development is designed to avoid blind corners and hidden spaces.
- This design response to this apartment development ensures an appropriate provision for the future character of the area that is desirable.”

The proposed design responds to the opportunities and constraints of the site, and will provide high amenity for future residents. An aerial perspective of the proposed development is provided at **Figure 6**.

A mix of contemporary materials and finishes are proposed including brickwork, concrete, metal cladding, sandstone features, timber blades and vertical metal blade balustrades.

Figure 6 – Perspective Viewed from Corner of Croatia Avenue and Future McFarlane Road



Source: Mosca Pserras Architects

4.4. LANDSCAPING

Landscape Plans have been prepared by Greenland Design and are provided at **Appendix G**. The landscape concept for the site incorporates the following:

- Street trees along Croatia Avenue and the new roadways;
- Trees, shrubs, planting beds and grassed spaces throughout the public and private open spaces;
- Ground floor communal open space including a playground, grassed terrace and barbeque area;
- Five roof top communal open spaces across Levels 4 and 5 of the proposed buildings. These spaces include barbeque areas, communal vegetable planters and seating areas.

Planting species proposed for the site have been chosen to ensure they are appropriate for the context and setting of the proposal.

4.5. SITE ACCESS AND NEW ROADS

4.5.1. New Roads

As the subject site is located within an urban release area, significant public works are required within the locality to facilitate development. The DA proposes the construction and dedication of several portions of new road in accordance with the LDCP 2008 as follows:

- Passendale Road: Local Access Street, 15.2m road reserve (half road construction). Total land dedication equates to 691sqm.
- Costello Lane: Laneway, 7m road reserve. Total land dedication equates to 758sqm.

The proposed roads have been designed and will be constructed in accordance with the design specifications of the LDCP 2008 as detailed in the Civil Plans at **Appendix J**.

It is anticipated that the proposed roadways will be constructed and dedicated to Council as 'works in kind' and the applicant seeks an offset against section 94 contributions

Croatia Avenue has an existing road reserve of approximately 20m, however the final design outlined in the LDCP 2008 is for a road reservation of 28.4m. A small portion of the subject site (618sqm) at the Croatia Avenue frontage is zoned SP2 Infrastructure (Local Road) and will be dedicated to Council for road

widening. The proposed design incorporates the proposed road widening, with setbacks based on the new boundary alignment.

4.5.2. Vehicular Access

The proposed buildings will be accessed via the new laneway that separates proposed Lots 1 and 2. Two separate entry/exit driveways will provide access to the two levels of basement car parking and storage areas for the development.

It is noted that vehicular access to the site in accordance with the LDCP 2008 is currently restricted as the applicant does not own the parcel of land connecting proposed McFarlane Road (new connector road) to Croatia Avenue. At this stage, vehicular access to the proposed development from the wider street network relies on the approved subdivision (200 Croatia Avenue) to the immediate north (Development Consent DA-141/2015). In the event that these roadways have not been constructed prior to the occupation of the subject site, temporary access will be negotiated with the adjoining land owners to allow vehicular access from the north or south to connect to Croatia Avenue.

4.5.3. Pedestrian Access

The proposed buildings will have controlled pedestrian access from the proposed new roads. The proposed ground floor residential dwellings will also have direct access from the adjacent public domain. The pedestrian access to the development has been designed to maximise ground floor activation across the site.

5. STRATEGIC PLANNING ASSESSMENT

5.1. A PLAN FOR GROWING SYDNEY

A Plan for Growing Sydney (the Strategy) includes goals, directions and actions that aim to support the strategic growth of Sydney over the next 18 years, including delivery of 664,000 new dwellings by 2034. The proposed development is consistent with the goals and directions contained within the Strategy, including:

- Direction 1.4: Transform the productivity of Western Sydney through growth and investment;
- Direction 2.1: Accelerate housing supply across Sydney;
- Direction 2.2: Accelerate urban renewal across Sydney;
- Direction 2.3: Improve housing choice to suit different needs and lifestyles;
- Direction 3.3: Create healthy built environments.

The proposal is consistent with the goals and the supporting directions as it will:

- Contribute to Sydney's housing supply through construction of 135 new apartments in an urban release area undergoing significant change.
- Contribute to housing choice, through the creation of one, two and three bedroom apartments.
- Revitalise an underutilised, semi-rural site that is progressively transitioning to a vibrant higher density precinct.
- Facilitate a healthy built environment through good design and a generous provision of communal open space and landscaping.

It is considered that the proposed development positively contributes to meeting the strategic directions provided by the Strategy.

5.2. DRAFT OUR GREATER SYDNEY 2056

Draft Our Greater Sydney 2056 (Draft Sydney Plan) includes a range of draft amendments to update *A Plan For Growing Sydney*, including a range of new objectives that will replace 'directions'. The proposed development is consistent with various objectives contained within the Draft Sydney Plan, including:

- Objective 10: Greater housing supply;
- Objective 11: Housing is more diverse and affordable; and
- Objective 30: Urban tree canopy cover is increased.

The proposal will contribute to housing supply and choice in the Liverpool LGA, including a mix of one, two and three bedroom apartments, which will place downward pressure on demand to ease housing affordability. The proposal also includes a significant number of new tree plantings across the site that will contribute to the desired landscape character of the area.

5.3. DRAFT WESTERN CITY DISTRICT PLAN

Released in October 2017, the *Draft Western City District Plan* (Draft District Plan) includes a range of statistics, priorities and actions to appropriately support the strategic growth of Sydney's Western City District. In particular, the Draft District Plan identifies that:

- The population of the Western City District is predicted to grow by 464,000 people between 2016 to 2036;
- An additional 184,500 homes will be required in the Western City District by 2036 to support the districts predicted population growth; and

- A total of 8,250 additional dwellings are targeted to be constructed within the Liverpool LGA between 2016 to 2021.

The proposed development will significantly contribute to delivering a number of these required dwellings within the Liverpool LGA and wider Western City District. The site is an appropriate location for this type of development based on its proximity to the Edmondson Park railway station.

6. STATUTORY PLANNING ASSESSMENT

Detailed consideration has been given to the relevant State planning controls that apply to the site and the proposed development, including:

- *Water Management Act 2000*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy No. 65 - Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (State Significant Precincts) 2005*
- *Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment*
- *Liverpool Local Environmental Plan 2008*
- *Liverpool Development Control Plan 2008*

6.1. WATER MANAGEMENT ACT 2000

The proposal includes the construction of a new headwall to discharge water to Maxwell Creek, which traverses the southern portion of the site (refer **Appendix J**) and is a 'controlled activity' under the *Water Management Act 2000*.

Consequently, the proposal is integrated development and requires concurrent consent from the NSW Department of Industry – Water before granting development consent to 'Integrated Development', the consent authority must obtain from each relevant approval body the general terms of any approval proposed to be granted by the approval body in relation to the development.

6.2. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of infrastructure across NSW. The ISEPP identifies matters to be considered in assessing development adjacent to infrastructure such as classified roads and prescribes consultation requirements for certain development types.

Clause 87:

Council advised during the pre-lodgement meeting held on 21 June 2017 that clause 87 of ISEPP should be addressed as part of the proposal. Clause 87 states:

"If the development is for the purposes of a building for residential use, the consent authority must not grant consent to the development unless it is satisfied that appropriate measures will be taken to ensure that the following LAeq levels are not exceeded:

(a) in any bedroom in the building—35 dB(A) at any time between 10.00 pm and 7.00 am,

(b) anywhere else in the building (other than a garage, kitchen, bathroom or hallway)—40 dB(A) at any time."

The NSW Department of Planning and Environment's (**DPE**) *Development Near Rail Corridors and Busy Roads-Interim Guideline* provides the appropriate procedure and screening method in determining the likelihood of noise and vibration from rail corridors. The Acoustic Report provided at **Appendix N** concludes:

"The subject site is located more than 400m from the nearest rail corridor and therefore railway noise and vibration is not likely to be an impact, and the assessment of railway noise and vibration is not required."

Notwithstanding this, the various design measures that are to be incorporated into the proposal to mitigate against adverse road noise impacts will also assist in mitigating potential railway noise.

Clause 102:

Clause 102 relates to impact of road noise or vibration on non-road development and applies to (amongst other things) a building for residential use that is:

“on land in or adjacent to the road corridor for a freeway, a tollway or a transitway or any other road with an annual average daily traffic volume of more than 40,000 vehicles (based on the traffic volume data published on the website of RMS) and that the consent authority considers is likely to be adversely affected by road noise or vibration.”

As noted in the Traffic and Parking Assessment at **Appendix O**, Croatia Avenue is currently a local unclassified road, however it is expected that the road will be upgraded and realigned to a major road as part of the precinct works, ultimately extending between Campbelltown Road and Camden Valley Way.

To ensure the bedroom and living spaces of the proposed apartments are not affected by potential adverse road noise, acoustic design recommendations outlined within the Acoustic Report at **Appendix N** will be implemented. This will ensure the proposal can comply with the acoustic requirements of the ISEPP.

Schedule 3 – Traffic Generating Development:

Schedule 3 of the ISEPP relates to ‘traffic generating development’ that must be referred to the Roads and Maritime Service (RMS) for comment during assessment and includes (amongst other things):

- A residential flat building with 300 or more dwellings that has access to any road; or
- A residential flat building with 75 or more dwellings that has access to a classified road, or to a road that connects to a classified road (within 90m).

It is proposed that vehicular access into the site will be provided via two separate entry/exit driveways from Costello Lane (to be constructed as part of this DA). Costello Lane will connect to other surrounding local roads including Passendale Road (to be partially constructed as part of this DA). Vehicular access into the site will not be provided directly from Croatia Avenue, which is currently identified as a local, unclassified road. Accordingly, referral to RMS is not required.

6.3. STATE ENVIRONMENTAL PLANNING POLICY 55 – REMEDIATION OF LAND

State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55) provides a state-wide planning approach for the remediation of land to reduce the risk of harm to human health or the environment. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to consent of a development application.

A Detailed Site Investigation (DSI) was undertaken by EI Australia and is provided at **Appendix H**. The investigation highlighted the following:

- *“Groundwater was not investigated as part of this assessment as it was not encountered during the investigation as well as the likelihood of impacted groundwater was low due to the predominant historical use of the site and surrounding properties for residential purposes. Groundwater onsite is anticipated to flow towards the onsite creek located in the southern portion of the site;*
- *In regards to human health risks, heavy metals, TRHs, BTEX, PAHs, OCPs/OPPs and PCBs were either detected at concentrations below the LOR or below the adopted criteria in all tested samples;*
- *In regards to ecological risks, all tested samples were below the adopted criteria. As a consequence for the identified concentrations of zinc in composite samples C6 and C7, all the samples included in both composite samples were tested for zinc and all of them reported below the adopted criteria;*
- *Overall, widespread contamination was not identified as part of the DSI and previously known data gaps based on the potential contamination sources, have largely been addressed. However, the possible presence of hazardous materials in existing site structures needs to be addressed in subsequent investigation works.”*

Based on the findings of the DSI *“EI concludes that soils and groundwater are suitable for the proposed development comprising of residential land use (with minimal access to soils) with associated open space.”* A Hazardous Materials and fill/soil management is recommended as part of site preparation works. EI has confirmed that a Remedial Action Plan is not required as part of the proposed development. Having regard to the above, it is submitted that the proposal is capable of satisfying the provisions of SEPP 55.

6.4. STATE ENVIRONMENTAL PLANNING POLICY (BUILDING SUSTAINABILITY INDEX: BASIX) 2004

The *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 (BASIX SEPP)* requires all residential development in NSW to achieve a minimum target for energy efficiency, water efficiency and thermal comfort. The proposed development has been assessed in accordance with the relevant requirements and a formal BASIX Certificate has been issued (Certificate Number: 886593M). The certificate confirms that the proposed development achieves the minimum water and thermal performance ratings required.

The BASIX Certificate is provided at **Appendix L**.

6.5. STATE ENVIRONMENTAL PLANNING POLICY NO 65 – DESIGN QUALITY OF RESIDENTIAL APARTMENT DEVELOPMENT

State Environmental Planning Policy No 65 (Design Quality of Residential Apartment Development) (SEPP 65) applies to development for the purposes of a building that comprises three or more storeys and four or more self-contained dwellings. Clause 28(2) of SEPP 65 specifies that when determining a development application for a residential apartment development, the consent authority is to consider:

- (a) *advice obtained from the Design Review Panel, and*
- (b) *Design Quality Principles, and*
- (c) *the Apartment Design Guide (ADG).*

Mosca Pserras Architects has prepared a Design Verification Statement (refer **Appendix D**), which outlines how the design quality principles of SEPP 65 are addressed, and demonstrates how the objectives in Parts 3 and 4 of the ADG have been achieved.

The performance of the proposal in relation to the key numeric requirements of the ADG is shown in **Table 4**.

Table 4 – Apartment Design Guide Key Numeric Requirements

Requirement	Proposal
Communal Open Space	1,625sqm (26.5% of the site area) is provided as communal open space. This exceeds the minimum 25% requirement of the ADG.
Deep Soil Zones	1,563sqm (25% of the site area) is provided as deep soil landscaping. This greatly exceeds the minimum 7% requirement of the ADG.
Building Separation and Visual Privacy	<p>The proposal is surrounded by existing or proposed roadways on three sides and will therefore be set back in excess of 20m from future residential properties to the east, west and south. In addition, Buildings A and B are set back a minimum 7.78m setback from the northern boundary. The proposal therefore complies with the building separation requirements to surrounding properties.</p> <p>Within the site, separation distances between the proposed buildings also comply with the ADG requirements as follows:</p> <ul style="list-style-type: none"> • Minimum 12m between Buildings A and B. • Minimum 12m between Buildings B and C • Minimum 15.43m between Buildings A and C. <p>Where visual privacy concerns could arise, frosted glass and privacy screens are proposed to restrict overlooking between apartments as detailed on the floor plans.</p>

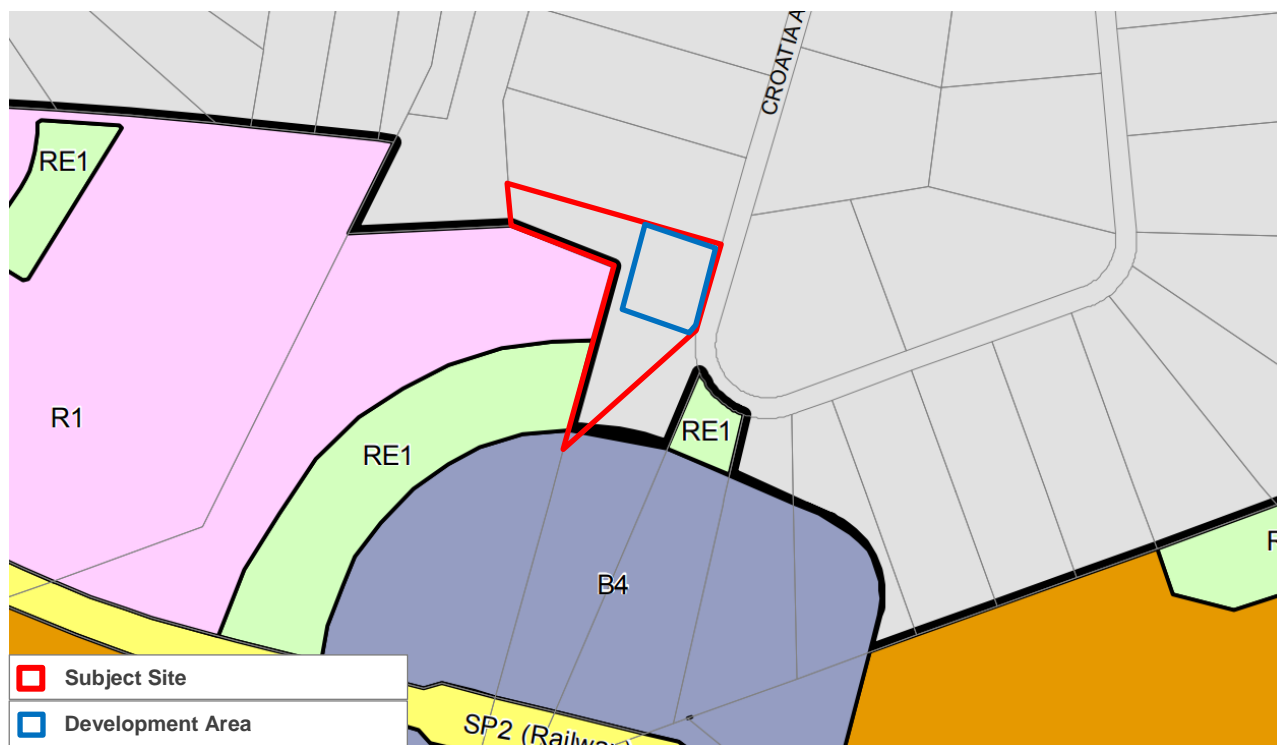
Requirement	Proposal
Solar Access	86% (116/135) of apartments within the proposed development receive at least 2 hours of direct sun between 9am and 3pm on 21 June. In addition, only 11% (15/135) of apartments receive no direct sunlight between 9am and 3pm on 21 June.
Natural Cross Ventilation	65% (88/135) of apartments within the proposed development are naturally cross ventilated. Alternate ventilation (i.e. wall ventilators) are proposed for the apartments facing Croatia Avenue to permit the closure of windows to protect against acoustic intrusion whilst allowing for natural ventilation.
Floor to Ceiling Heights	Habitable rooms to all apartments within the proposed development meet the 2.7m ceiling height requirement.
Minimum Apartment Sizes	All proposed apartments layouts comply with the requirements of the ADG with regards to room layouts and dimensions.
Private Open Space	All apartment types achieve the minimum required private open space areas identified within the ADG.
Common Circulation	The maximum number of apartments sharing a circulation core within the proposed development is 8, which complies with the ADG.
Storage	All apartments comply with the storage requirements of the ADG. Where the full volume of storage space is not accommodated within the apartment, 50% or less has been provided within dedicated basement storage areas.

As demonstrated above, the proposal accords with the core requirements of the ADG.

6.6. STATE ENVIRONMENTAL PLANNING POLICY (STATE SIGNIFICANT PRECINCTS) 2005

State Environmental Planning Policy (State Significant Precincts) 2005 (SEPP SSP) – 'Edmondson Park South' applies to the southern tip of the site as identified within Figure 5, and is zoned B4 Mixed Use. Given this area of the site does not form part of the development area (highlighted blue) and no physical works are proposed, the provisions of SEPP SSP are not relevant to the proposal.

Figure 7 – SEPP SSP



Source: State Environmental Planning Policy (State Significant Precincts) 2005 and Urbis

6.7. GREATER METROPOLITAN REGIONAL ENVIRONMENTAL PLAN NO 2 – GEORGES RIVER CATCHMENT

The site is located within the Georges River Catchment area. Accordingly, *Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment (GMREP2)* applies to the site and consideration of the proposal against the general aims and objectives of GMREP2 is required.

The general aims and objectives include (amongst other things):

- “To maintain and improve the water quality and river flows of the Georges River and its tributaries and ensure that development is managed in a manner that is in keeping with the national, State, regional and local significance of the Catchment;
- To protect and enhance the environmental quality of the Catchment for the benefit of all users through the management and use of the resources in the Catchment in an ecologically sustainable manner;
- To ensure consistency with local environmental plans and also in the delivery of the principles of ecologically sustainable development in the assessment of development within the Catchment where there is potential to impact adversely on groundwater and on the water quality and river flows within the Georges River or its tributaries;
- To establish a consistent and coordinated approach to environmental planning and assessment for land along the Georges River and its tributaries and to promote integrated catchment management policies and programs in the planning and management of the Catchment; and
- To provide a mechanism that assists in achieving the water quality objectives and river flow objectives agreed under the Water Reform Package.”

The proposed development has been designed to appropriately respond to these aims and objectives. The proposed erosion and sediment control measures during construction and ongoing drainage concept (refer to concepts in **Appendix J**) will ensure the proposal does not have a negative impact on the Georges River catchment.

6.8. LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008

Liverpool Local Environmental Plan 2008 (LLEP 2008) is the principal environmental planning instrument governing development at the site. An assessment of the proposal against the relevant controls of LLEP 2008 is presented below.

6.8.1. Zoning, Permissibility and Objectives

The majority of the site is zoned R1 General Residential, with small portions of the site also zoned:

- RE1 Public Recreation: heavily vegetated land within the southern portion of the site.
- SP2 – Infrastructure (Local Road): frontage to Croatia Avenue, which is to be dedicated to Council for road widening.
- B4 Mixed Use (zoned under the SEPP SSP): southern tip of the site.

The residential development associated with this DA is contained within the area of the site zoned R1 General Residential. Within the R1 General Residential Zone, 'residential flat buildings' and 'roads' are permitted with consent. Internal roads are proposed to be constructed as shown on the plans in **Appendix C**.

The relevant objectives of the R1 zone are:

- *"To provide for the housing needs of the community.*
- *To provide for a variety of housing types and densities.*
- *To ensure that housing densities are broadly concentrated in locations accessible to public transport, employment, services and facilities."*

The proposal is consistent with these objectives as:

- A mix of one, two and three bedroom apartments is proposed consistent with the LDCP 2008 for Edmondson Park and this will in part meet the demand for housing in this urban release area.
- The site is highly accessible and proximate to Edmondson Park railway station. The development will be supported by a range of future employment generating land uses to be delivered in the Town Centre. The site is suitable for supporting the development density proposed.

6.8.2. Other LEP Provisions

Other relevant provisions contained to the LLEP are addressed in **Table 5** overleaf.

Table 5 – LLEP 2008 Compliance Table

Clause	Control	Comment	Compliance
Clause 2.6 – Subdivision-Consent Requirements	The subdivision of land requires development consent.	The proposal seeks consent to subdivide the site into four lots comprised of the residential development lot (proposed Lots 1 and 2), future road lots (proposed Lot 3) and residual lot (proposed Lot 4) as detailed in the subdivision plan at Appendix C .	YES
Clause 2.7 – Demolition Requires Development Consent	The demolition of a building or work may be carried out only with development consent.	The proposal seeks to demolish existing structures at the site as detailed on the demolition plan included at Appendix C .	YES

Clause	Control	Comment	Compliance
Clause 4.1 – Minimum Subdivision Lot Size	300sqm	The proposal seeks consent to subdivide the site into four lots. Each lot exceeds 300sqm in area.	YES
Clause 4.3 – Height of Buildings	Proposed residential development located in area of the site with a maximum 21m height limit.	<p>The majority of the proposed built form and building parapet height is consistent with the 21m height of building standard applicable to the site.</p> <p>A minor variation is sought in relation to the lift overruns and small area of the parapet of Building C (adjacent to Costello Lane). The lift overruns are set back from the main building parapet, will not be visible from the streetscape and will not create any additional shadow impacts on surrounding properties.</p> <p>The proposed variation is considered reasonable and justified under the provisions of clause 4.6 of LLEP 2008. This is discussed in more detailed in the Clause 4.6 Variation Request at Appendix E.</p>	NO – Refer clause 4.6 Variation
Clause 4.4 – Floor Space Ratio (FSR)	Proposal located in area of the site with a maximum FSR of 1.5:1.	<p>Based on the development area (7,759.25sqm) and proposed GFA (11,638sqm), the FSR equates to 1.5:1.</p> <p>Plans demonstrating the calculation of GFA used to calculate the FSR have been included as part of the architectural plans at Appendix C.</p>	YES
Clause 5.1 - Relevant Acquisition Authority	Minor portion of the eastern edge of the site adjoining Croatia Avenue marked for future road widening.	<p>The proposed development has been designed to be setback from that part of the site zoned SP2 Infrastructure.</p> <p>As outlined previously, a section of the frontage to Croatia Avenue has also been compulsory acquired by Council for a new bus stop. The proposed buildings have been adequately set back to accommodate the bus stop.</p>	YES
Clause 5.9 – Preservation of Trees or Vegetation	A person must not ringbark, cut down, top, lop, remove, injure or wilfully destroy any tree or other vegetation without consent.	Several trees are required to be removed along the frontage to Croatia Avenue to allow Council to construct a	YES

Clause	Control	Comment	Compliance
		<p>bus stop and road widening at this location.</p> <p>The proposed tree removal will be compensated by the extensive tree planting proposed, including new streets along Croatia Avenue and new roadways. The details are shown on the Landscape Plans in Appendix G.</p>	
Clause 5.10 – Heritage Conservation	Conserve the heritage significance of heritage items and heritage conservation areas.	<p><u>European Heritage:</u></p> <p>The site is not identified as a heritage item or located within a heritage conservation area. Further, the proposal is not located near items of heritage significance or heritage conservation areas.</p> <p><u>Aboriginal Heritage:</u></p> <p>An AHIMS Search was undertaken, which confirmed no Aboriginal sites or places are recorded within 50m of the site.</p> <p>See Appendix F for further details.</p>	YES
Clause 7.8 – Flood Planning	The proposal must be designed to minimise flood risk.	<p>The southern portion of the site is identified as being flood prone. As outlined in the Flood Statements at Appendix K:</p> <ul style="list-style-type: none"> • The proposal makes provision for temporary compensatory storage to ensure that flooding elsewhere in the floodplain is not increased. • The proposed development also accommodates the 1% AEP flood level plus necessary freeboard. 	YES
Clause 7.11 – Minimum Dwelling Density	Minimum 28 dwellings per hectare.	The proposal seeks to provide 135 dwellings at the site on proposed Lots 1 and 2. This proposed dwelling density exceeds the minimum required.	YES
Clause 7.31 – Earthworks	Earthworks must not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features on surrounding land.	Excavations to a depth of approximately 7.7m will be required for the basement. Proposed earthworks will be undertaken in accordance with the:	YES

Clause	Control	Comment	Compliance
		<ul style="list-style-type: none"> • Geotechnical Report (refer Appendix I), • DA conditions of consent; and • will be managed with appropriate silt, sediment and erosion controls (refer to Appendix J) in place and construction management plan. 	

6.9. LIVERPOOL DEVELOPMENT CONTROL PLAN 2008

The *Liverpool Local Environmental Plan (LDCP 2008)* provides detailed controls for specific development types and locations. Many controls in the LDCP 2008 relate to character, streetscape and public domain works. An assessment of the proposal against the key relevant controls within the LDCP 2008 has been provided in **Table 6**.

Table 6 – DCP 2008 Compliance Table

Consideration	Control	Comment	Compliance
Part 1: General Controls for All Development			
20 – Car Parking and Access	Car parking rates for residential flat buildings: <ul style="list-style-type: none"> • 1 Bedroom – 1 space per dwelling • 2 Bedroom – 1.5 spaces per dwelling • 3+ Bedroom – 2 spaces per dwelling • Visitors – 1 space per 4 dwellings 	These rates trigger the requirement for 230 car spaces. The proposal seeks to provide a total of 217 car parking spaces (comprising 183 residential spaces and 34 visitor spaces). Although proposal does not specifically meet the requirements of the LDCP 2008, the proposed car parking satisfies the parking rates within the <i>RMS Guide to Traffic Generating Developments</i> . This is discussed in more detail in the Traffic and Parking Report at Appendix O and Section 7.3.1 of this report.	ACCEPTABLE - Complies with RMS rates
27 – Social Impact Assessment	Social Impact Comment required for residential flat buildings greater than 20 units, but less than 250 units.	A Social Impact Comment has been prepared (refer to Appendix P).	YES
Part 2.11: Land Subdivision and Development in Edmondson Park			
1.1 – Indicative Layout	All development is to be undertaken generally in accordance with the indicative layout plan for Edmondson Park.	The proposed development has been specifically designed to be consistent with the indicative layout plan including the: <ul style="list-style-type: none"> • Proposed subdivision layout; and 	YES

Consideration	Control	Comment	Compliance
		<ul style="list-style-type: none"> Proposed design of McFarlane Road, Passendale Road and Costello Lane. 	
3.3 - Setbacks	<p><u>Front Setback:</u> 4.5m</p> <p><u>Secondary Setback:</u> 2.5m</p> <p><u>Side and Rear Setback:</u> As per ADG</p>	Buildings A and B have been set back a minimum of 4.5m from the new boundary alignment to Croatia Avenue, taking into consideration the proposed road widening and bus stop. Building B and Building C have also been set back a minimum of 4.5m from future McFarlane Road and Passendale Road respectively.	YES
3.4 – Landscaped Area and Private Open Space	<p><u>Landscaped area:</u> Minimum of 20% of the site area shall be .</p> <p><u>Private open space per dwelling size:</u> Less than 65sqm - 12sqm Between 65 and 100sqm – 14sqm Greater than 100sqm – 14sqm</p>	<p>The proposal incorporates a total of 1,563sqm (25% total site area) of landscaped area across the site. The design details are shown in Appendix G.</p> <p>Private open spaces in the form of courtyards and balconies have also been provided for each proposed dwelling. Private open space is proposed in accordance with the design requirements of the ADG, which take precedence over the LDCP 2008.</p>	YES
3.6 – Car Parking and Access	<p>Car parking should be designed to reflect the following:</p> <ul style="list-style-type: none"> Visitor parking to be provided shall be clearly identified; Parking should be provided underground; and Vehicular entrances should be provided from the side of the building. <p>The proposal should also provide equitable pedestrian access.</p>	<p>The proposed car parking has been designed to comply with the LDCP 2008 with:</p> <ul style="list-style-type: none"> Dedicated visitor parking provided and will be clearly identified; All car parking is provided underground within the basement levels; and Vehicular access points provided from Costello Lane and not from primary street frontages. <p>The BCA Assessment at Appendix M confirms that the proposed development can comply with the relevant accessibility requirements.</p>	YES
3.7 – Amenity and Environmental Impact	The proposal should be designed to ensure that:	There are currently no dwellings on properties adjoining the subject site	YES

Consideration	Control	Comment	Compliance
	<ul style="list-style-type: none"> 50% of the private open space on adjoining properties receive at least a minimum three hours of sunlight between 9am and 5pm on 21 June; Onlooking is avoided to maximise visual privacy; and A high level of acoustic amenity is provided for residents and guests within the proposed residential flat buildings. 	<p>that will be affected by way of overshadowing and visual privacy. As detailed in the shadow diagrams at Appendix C, the proposed shadows will generally fall across the existing and future roadways surrounding the site.</p> <p>The proposal complies with the ADG in terms of solar access and visual privacy and will provide residents with a high level of amenity.</p> <p>The acoustic design recommendations outlined in the Acoustic Report (refer Appendix N) will be implemented to achieve acoustic amenity internal to the apartments.</p>	

7. KEY PLANNING CONSIDERATIONS

The proposed development has been assessed having regard to a wide range of social, environmental and economic considerations. These are discussed in the following subsections.

7.1. DESIGN AND BUILT FORM

The subject site is located within the 'Urban' character area of Edmondson Park and the Future Character Statement within the LDCP 2008 describes the vision for the area as follows:

"...a dense, urban, but predominately residential zone that provides a transition between the Town Centre and the medium to lower density residential areas. The character area helps define the main avenue, Croatia Avenue that leads into the Town Centre and helps frame the Urban Parkland and Maxwell's Creek Urban Park.

Housing types that reinforce the urban character and need for well-located higher densities predominate including apartment buildings and small lot/attached housing. A minimum net residential density of 28 dwellings per hectare is required. Building setbacks are relatively shallow, and there is a close interaction of buildings to the surrounding streets.

Taller buildings are encouraged to frame Croatia Avenue and the Maxwells Creek Urban Park. Buildings are predominantly between 3 - 6 storeys and massed towards the public realm."

The proposed built form responds positively to the desired future character, planning framework and surrounding context as follows:

- The proposal is predominantly of a building height of 21m in accordance with the LLEP 2008 – except for the lift overruns and a small area of the Building C parapet, which are negligibly above this in isolated locations. The FSR of the proposal is 1.5:1 consistent with the LLEP 2008.
- The taller, six storey elements are oriented towards the Croatia Avenue frontage in order to frame and emphasise the main road. In addition, the setbacks at the upper levels of the buildings reduce the massing of the built form and provide a transition to the lower scale housing expected to the west of the site.
- Setbacks from the existing and proposed roadways comply with the LDCP 2008 requirements and will be landscaped with new street trees to contribute to the public streetscape.
- The built form (and living spaces) are predominantly oriented towards the north, east and west to provide high levels of solar access and amenity as required under the ADG. These spaces are also located away from future, surrounding apartments, consistent with the building separation distances under the ADG in relation to acoustic/visual privacy.
- The proposal adopts a mix of contemporary materials which, together with the balconies, articulate the facades of the building and provide visual interest. The individual entries at ground level also activate the street frontages and provide engagement with the public domain.
- The proposal is complimented by a range of landscape embellishments, including new street trees, which will improve the public domain and contribute to the future landscape character of the surrounding area.
- The proposed number of dwellings satisfies the minimum net residential density required.

7.2. EXTERNAL AMENITY

The proposal will not prejudice the development of adjoining properties or unreasonably impact on the amenity of future residents given:

- The subject site is in the beneficial position of being surrounded by existing and proposed roadways on three sides and an approved residential subdivision to the immediate north (DA-141/2015).
- Buildings A and C incorporate a minimum setback of 7.78m from the northern boundary, which complies with the building separation requirements of the ADG.

- The separation provided by the roadways and setback to the northern boundary will avoid unreasonable overlooking from the development into future dwellings surrounding the site.
- Shadow diagrams have been prepared by Mosca Pserras Architects to assess shadowing impacts generated by the proposal. These diagrams indicated that on 21 June, shadows will largely be contained within the subject site and will fall across Croatia Avenue and the proposed roadways. Importantly, the proposal will not overshadow the neighbouring property to the north.
- It is considered that the proposal has been designed with consideration of the visual impact of the development on the locality as well as to offer scenic outlook opportunities for residents. The proposal incorporates high quality and articulated facades that will contribute to the architectural diversity expected in this transitional area and will deliver a streetscape with visual interest.

7.3. TRAFFIC AND PARKING

7.3.1. Access

Vehicular access to the proposed basement levels will be provided from the new laneway to be constructed and dedicated to Council as part of the DA. The entry/egress points have been designed to reduce the disruption to the surrounding pedestrian network and public domain, and represent the most efficient transport solution for the site. The access points will be screened through roller doors, with automated intercoms to access the basement parking levels.

Under LDCP 2008 vehicle access to the site is to be provided from proposed McFarlane Road (a new connector road), which will intersect with Croatia Avenue. The applicant does not own the parcel of land that connects McFarlane Road to Croatia Avenue, however negotiations are underway. An alternative arrangement is available and at this stage, it is expected that vehicular access to the proposed development will rely on the approved subdivision to the immediate north (Development Consent DA-141/2015). In the event that these roadways have not been constructed prior to the occupation of the subject site, temporary access will be negotiated with the adjoining land owners to allow vehicular access from the north or south to connect to Croatia Avenue. The roads as shown on the plans (refer to **Appendix C**) will be constructed and dedicated to Council as part of this proposal.

7.3.2. Parking Provision

As outlined in **Table 6**, the LDCP 2008 requires the provision of 230 car parking spaces for the proposed 135 dwellings. The proposal includes a total of 217 car parking spaces, comprising 183 residential spaces and 34 visitor spaces. Although this proposed rate does not specifically meet the requirements of the LDCP 2008, the provision of 217 carparking spaces is acceptable, as the site is located within 800m from Edmondson Park railway station. It is noted that Objective 3J-1 of the ADG states:

“For development in the following locations:

- *On sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or*
- *On land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre*

The minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less (our emphasis).”

In accordance with the RMS *Guide to Traffic Generating Developments*, the 135 dwellings require the provision of 114 car parking spaces, which is 116 spaces less than the LDCP 2008 requirement. Accordingly, the RMS rates have been relied upon, of which the proposal greatly exceeds the requirement. Adoption of the RMS rate will also ensure that the proposal will encourage the use of sustainable modes of transport to access the site.

7.3.3. Traffic Generation

Traffic generation estimates for the proposed development have been calculated based on the RMS *Guide to Traffic Generating Developments*. Estimates of peak hour traffic volume increases generated for the proposed development of 135 dwellings at the site are as follows:

- Increase of approximately 26 vehicle trips per hour during the AM peak; and

- Increase of approximately 20 vehicle trips per hour during the PM peak.

Having regard to the above, the Traffic and Parking Assessment (refer to **Appendix O**) concludes that the:

“projected increase in traffic activity as a consequence of the development proposal is minimal, consistent with the new zoning objectives of the site and will clearly not have any unacceptable traffic implications in terms of road network capacity or traffic-related environmental effects.”

7.4. ACOUSTIC IMPACTS

The Acoustic Assessment prepared by Acouras Consultancy and provided at **Appendix N** identifies the following potential noise sources that could impact residential amenity:

- Noise and vibration from nearby rail corridor and roads;
- Noise transfer between apartments; and
- Mechanical services and plant noise emission from the proposed residential buildings.

The assessment concludes that:

- The subject site is located more than 400m from the nearest rail corridor and therefore railway noise and vibration is not likely to be an impact, and an assessment of railway noise and vibration is not required.
- Alternate ventilation (i.e. wall ventilators) is required for the apartments facing Croatia Avenue to permit the closure of windows to protect against acoustic intrusion (road noise) from Croatia Avenue in accordance with the ISEPP.
- Recommended glazing, external walls and roof/ceiling systems will achieve high internal noise amenity and reduce the transfer of noise between apartments.
- The mechanical services and plant can be satisfactorily attenuated to levels complying with acoustic criteria.

Subject to the recommendations outlined in the Acoustic Assessment, it is anticipated that the development can comply with the relevant acoustic standards and criteria and that a high quality internal environmental will be achieved.

7.5. SOCIAL IMPACTS

7.5.1. Crime Prevention Through Environmental Design

The Crime Prevention Through Environmental Design (CPTED) guidelines were prepared by the NSW Police in conjunction with the NSW Department of Planning and Environment. CPTED provides a clear approach to crime prevention and focuses on the planning, design and structure of cities and neighbourhoods. The main aims of the guidelines are to:

- Limit opportunities for crime;
- Manage space to create a safe environment through common ownership and encouraging the public to become active guardians; and
- Increase the perceived risk involved in committing crime.

The guidelines provide four key principles to limit crime: natural surveillance, access control, territorial reinforcement and space management. **Table 7** outlines how the proposed development has been designed to incorporate these CPTED design principles.

Table 7 – CPTED Assessment

	Principle	Definition	Proposal
1	Natural Surveillance	Natural surveillance is a by-product of well-planned, well-designed and well-used space. It involves maximising opportunities for passers-by and users to observe what happens in an area (the 'safety in numbers' concept). Higher risk locations can also benefit from organised surveillance, which involves the introduction of formal measures such as on-site security guards or CCTV.	<ul style="list-style-type: none"> The proposal incorporates balconies facing the existing and proposed roadways. This will provide passive surveillance for future residents of the development and for passers-by on these adjoining roads. Appropriate lighting will be installed at street level and in all areas throughout the development. The basement level will be adequately lit with signs to ensure safe access.
2	Access Control	Control of who enters an area so that unauthorised people are excluded, for instance, via physical barriers such as fences, grills etc.	<ul style="list-style-type: none"> Temporary construction fencing will be installed around the site during construction to restrict access in accordance with workplace safety requirements. Access to the development will be restricted to residents of the building to prevent unauthorised access. Visitors will obtain access through residents of the building. Private courtyard spaces on the ground floor of the site will be appropriately fenced and locked to restrict access to residents of that apartment only. Vehicular access points will be well lit, signposted and unconcealed to ensure safe access. Roller doors and automated intercoms will control access to the basement car parking.
3	Territorial Reinforcement	People are more likely to protect territory they feel they own and have a certain respect for the territory of others. This can be expressed through installation of fences, paving, signs, good maintenance and landscaping. Territoriality relates to the way in which a community has ownership over a space.	<ul style="list-style-type: none"> All areas at ground level will have a clear delineation between public and private space to provide a sense of ownership. The proposal provides well-designed spaces. The landscaping proposed as part of the development will be managed by the sites future strata body to ensure the landscape design maintains its integrity and vandalism is discouraged.
4	Space Management	Ensures that space is appropriately utilised and cared for. Space management strategies include: activity coordination (i.e. having a specific plan for the way different types	<ul style="list-style-type: none"> Regular maintenance will promote an image of a well-cared for development which discourages graffiti and vandalism.

	Principle	Definition	Proposal
		of activities are carried out in space), site cleanliness, rapid repair of vandalism and graffiti, the replacement of burned out lighting and the removal or refurbishment of decayed physical elements.	<ul style="list-style-type: none"> The significant landscaped areas proposed as part of the development will be predominantly managed by the future strata body (including landscaped setbacks, common open space and communal rooftop spaces) to ensure the landscape design maintains its integrity and vandalism is discouraged. Hardwearing materials will be utilised where appropriate to minimise opportunities for vandalism.

7.5.2. Dwelling Mix

The site is located within Edmondson Park which as per 2016 census data, has an existing household structure comprising the following:

- *Couples with children – 64.9%*
- *Couples without children – 16.1%*
- *One parent families – 7.6%*
- *Group households – 0%*
- *Lone persons – 4.9%*
- *Other – 6.7%*

These household demographics suggest that Edmondson Park requires a significant mix of two-plus bedroom apartments to accommodate couples and families, and some one bedroom apartments to accommodate remaining lone persons.

In accordance with the above, 77% (104/135) of the apartments incorporate two or three bedrooms, with the remaining 23% (31/135) provided as one bedroom apartments to accommodate single persons and couples. The proposal will make a positive impact on housing choice and affordability within Edmondson Park.

7.6. ECONOMIC IMPACTS

It is considered the following positive economic impacts will arise both during the construction and occupation stages as a result of the proposed development:

- The construction of the development will generate employment opportunities and contribute to the local and broader economy through new jobs in the construction sector.
- The proposed development will increase the supply of residential apartments in the LGA, broadening housing choice and providing additional opportunities for a mix of household types to reside in the locality.
- The residential apartments are within the Edmondson Park urban release area and will benefit from the proximity to public transport and future employment and retail opportunities. Increasing the provision of housing in proximity to the future town centre will also improve the viability and activity of the centre.

8. SECTION 79C ASSESSMENT

The following assessment has been structured in accordance with section 79C(1)(a) of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

8.1. ENVIRONMENTAL PLANNING INSTRUMENTS

The proposed development has been assessed in accordance with the relevant state, regional and local planning policies, as follows:

- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy No. 65 - Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (State Significant Precincts) 2005*
- *Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment*
- *Liverpool Local Environmental Plan 2008*

This SEE demonstrates within **Section 6** that the proposed development is generally consistent with the relevant provisions of each of the environmental planning instruments that apply to the proposal. The negligible exceedances to the height of buildings development standard under LLEP 2008 has been justified within the clause 4.6 variation at **Appendix E**.

8.2. DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

There are no draft environmental planning instruments that are of relevance to the proposal.

8.3. DEVELOPMENT CONTROL PLAN

The proposal demonstrates a high level of compliance with the local provisions contained in LDCP 2008. This has been addressed in detail within **Table 6**.

8.4. PLANNING AGREEMENT

The development application not accompanied by a Voluntary Planning Agreement. Road works required by LDCP 2008 will be delivered in consultation with Council.

8.5. REGULATIONS

The relevant regulations have been considered in preparation of this application.

8.6. LIKELY IMPACTS OF THE DEVELOPMENT

The likely impacts of the development have been considered under **Section 7**.

8.7. SUITABILITY OF THE SITE FOR DEVELOPMENT

The site is suitable for the proposed development for the following reasons:

- The proposed development is permissible with consent and consistent with the land use objectives of the R1 General Residential Zone.
- The proposal accords with the objectives of all relevant planning controls and achieves a high level of planning policy compliance.

- The Future Character Statement within the LDCP 2008 identify the site as being suitable for facilitating taller buildings between 3 to 6 storeys to frame Croatia Avenue.
- The site is highly accessible by public and private transport.
- The proposal will not have an unreasonable impact on the amenity of the site or adjoining properties.
- An additional 184,500 homes will be required in the Western City District by 2036 to support 464,000 additional people. The proposal will help to deliver a portion of these additional dwellings required to facilitate the population growth.

Overall, the site is considered highly suitable for the site and is consistent with the vision for future development within the locality.

8.8. THE PUBLIC INTEREST

The proposal is in the public interest for the following reasons:

- The land is zoned for residential purposes and the proposal will facilitate the delivery of 135 additional dwellings within Edmondson Park and the wider Liverpool LGA. This will:
 - Provide additional dwellings within Sydney to meet current and future demand;
 - Provide additional adaptable units;
 - Generate construction jobs during the construction phase of works and on-going jobs at the project's completion in strata management and maintenance roles; providing additional jobs closer to homes; and
 - Provide additional dwellings near a dedicated railway station, encouraging the use of sustainable transport.
- The proposal achieves a high level of planning policy compliance, including SEPP 65 and the ADG and provide a high level of amenity to residents of the development.
- The proposal has a high quality of landscaping at ground level that will contribute to the vitality and streetscape, particularly along Croatia Avenue and the new roadways.
- The vegetation contained in the riparian corridor in the southern portion of the subject site are outside the development area and will be unaffected by the construction of the roads and residential apartments.

9. CONCLUSION

This SEE has been prepared on behalf of Croatia 88 Pty Ltd in support of a DA for the redevelopment of part of 190 Croatia Avenue, Edmondson Park.

This proposal has been considered under the provisions of section 79C of the EP&A Act and other relevant environmental planning instruments. The proposal will deliver a good planning and built form outcome for the site as:

- **It is consistent with state and local strategic planning policies:**
The proposal positively contributes to state strategic requirements to deliver greenfield housing supply in the South West Growth Centre. It is also consistent with the desired future character for the area as outlined in the LDCP 2008 for Edmondson Park.
- **The proposal satisfies the applicable local and state planning policies.**
The proposed development has been specifically designed in accordance with the relevant controls contained to the following local and State planning policies:
 - *Water Management Act 2000*
 - *State Environmental Planning Policy (Infrastructure) 2007*
 - *State Environmental Planning Policy No. 55 – Remediation of Land*
 - *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
 - *State Environmental Planning Policy No. 65 - Design Quality of Residential Apartment Development*
 - *State Environmental Planning Policy (State Significant Precincts) 2005*
 - *Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment*
 - *Liverpool Local Environmental Plan 2008*
 - *Liverpool Development Control Plan 2008*

The negligible exceedances to the height of buildings development standard under LLEP 2008 has been justified within the clause 4.6 variation request.

- **The proposal is suitable for the site.**
In accordance with the draft Sydney Region Plan prepared by the Greater Sydney Commission, an additional 184,500 homes will be required within the Western City District by 2036 to support 464,000 additional people. The proposal will help deliver a significant portion of these additional required dwellings in a location that is highly accessible by public and private transport.
- **The proposal is in the public interest.**
The proposal includes the construction of a high quality residential development providing active frontages to Croatia Avenue and the proposed new roadways. The proposal will facilitate the delivery of 135 additional dwellings within the Edmondson Park urban release area and the wider LGA. Further, the proposal promotes sustainable outcomes, as it incorporates a range of energy efficient design solutions and provides new housing near a railway station, thereby encouraging the use of sustainable transport.
- **The proposal will not unreasonably impact on the amenity of surrounding properties.**
The proposal will not result in any unacceptable impacts on surrounding properties and the wider public domain.

The proposal represents a sound development outcome that respects and responds to the site location and the amenity of surrounding developments.

DISCLAIMER

This report is dated 8 February 2018 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Croatia 88 Pty Ltd (**Instructing Party**) for the purpose of Statement of Environmental Effects (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A COST SUMMARY REPORT

APPENDIX B SURVEY PLAN

APPENDIX C

ARCHITECTURAL PLANS

APPENDIX D

DESIGN VERIFICATION STATEMENT

APPENDIX E

CLAUSE 4.6 VARIATION REQUEST

APPENDIX F STATEMENT OF HERITAGE IMPACT

APPENDIX G LANDSCAPE REPORT AND PLANS

APPENDIX H

DETAILED SITE INVESTIGATION

APPENDIX I GEOTECHNICAL REPORT

APPENDIX J

CIVIL AND STORMWATER CONCEPT

APPENDIX K FLOOD STATEMENTS

APPENDIX L BASIX CERTIFICATE

APPENDIX M BCA ASSESSMENT REPORT

APPENDIX N

ACOUSTIC REPORT

APPENDIX 0

TRAFFIC AND PARKING ASSESSMENT

APPENDIX P

SOCIAL IMPACT COMMENT

APPENDIX Q WASTE MANAGEMENT PLAN

APPENDIX R

PUBLIC UTILITY INFRASTRUCTURE REPORT



BRISBANE

Level 7, 123 Albert Street
Brisbane QLD 4000
Australia
T +61 7 3007 3800

MELBOURNE

Level 12, 120 Collins Street
Melbourne VIC 3000
Australia
T +61 3 8663 4888

PERTH

Level 14, The Quadrant
1 William Street
Perth WA 6000
Australia
T +61 8 9346 0500

SYDNEY

Level 23, Darling Park Tower 2
201 Sussex Street
Sydney NSW 2000
Australia
T +61 2 8233 9900