

CLAUSE 4.6 SUBMISSION EXCEPTION TO DEVELOPMENT STANDARD FOR BUILDING HEIGHT

**Construction of a Seniors Housing Development
Comprising Fifty-two (52)
Independent Living Apartments**

Property:

**Former “Caroline Chisholm Village Retirement Village”
Lot 120 DP 613223 & Lot 51 DP 862728
No. 40A Cope Street Lane Cove**

Applicant:

Jackson Teece Architects
on behalf of Retire Australia Pty Ltd



Date:

June 2023

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CLAUSE 4.6 SUBMISSION

SUMMARY	
APPLICANT	Jackson Teece Architects (<i>on behalf of Retire Australia Pty Limited</i>)
PROPOSAL	Construction of a seniors housing development comprising a vertical retirement village in two (2) buildings containing 52 independent living apartments and associated community facilities
SITE DETAILS	Lot 120 DP 613223 & Lot 51 DP 862728
PROPERTY ADDRESS	No. 40A Cope Street Lane Cove NSW 2066
RELEVANT DEVELOPMENT STANDARD	Section 87(2)(c) of the State Environmental Planning Policy (Housing) 2021 – <i>Additional floor space ratios and height bonus</i>
DATE	June 2023
REVISION No.	B

INTRODUCTION

The objectives of clause 4.6 of Lane Cove LEP 2009 (LCLEP) are as follows:

- (a) *to provide an appropriate degree of flexibility in applying certain development standards to particular development,*
- (b) *to achieve better outcomes for and from development by allowing flexibility in particular circumstances.*

To this end and in accordance with clause 4.6(3), this submission requests and seeks to justify a variation to a development standard contained within *State Environmental Planning Policy (Housing) 2021* (the Housing SEPP), specifically the additional height (or height bonus) referenced under section 87(2)(c) of the Housing SEPP which applies to the subject development. The submission seeks approval for a variation to the development standard as it applies to the proposed development on the following basis:

1. Compliance with the development standard is unreasonable or unnecessary in the circumstances of the case;
2. There are sufficient environmental planning grounds to justify contravening the development standard;
3. The proposed development will be in the public interest on the basis it is consistent with the relevant objectives of the particular standard and the objectives for development within the R4 High Density Residential zone in which the development is proposed to be carried out; and
4. Departure from the standard on this occasion will achieve a better built outcome for and from the proposed development, will not raise any matter of significance for state or regional environmental planning and no particular public benefit will be served by maintaining the standard.

This submission should be read in conjunction with the amended Statement of Environmental Effects (SoEE) prepared by *Tim Shelley Planning* (Revision C dated 6/6/23) and the plans prepared by *Jackson Teece Architects* (Project No. 2017048 various issue nos. but all dated 7/6/23).

THE DEVELOPMENT STANDARD TO WHICH THE REQUEST RELATES

87 Additional floor space ratios

Section 87 of the Housing SEPP states:

- (1) This section applies to development for the purposes of seniors housing on land to which this Part applies if—
 - (a) development for the purposes of a residential flat building or shop top housing is permitted on the land under another environmental planning instrument, or
 - (b) the development is carried out on land in Zone E2 Commercial Centre or Zone B3 Commercial Core.
- (2) Development consent may be granted for development to which this section applies if:
 - (a) the site area of the development is at least 1,500m², and
 - (b) the development will result in a building with the maximum permissible floor space ratio plus—
 - (i) for development involving independent living units—an additional 15% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units, or
 - (ii) for development involving a residential care facility—an additional 20% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of the residential care facility, or
 - (iii) for development involving independent living units and residential care facilities—an additional 25% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units or a residential care facility, or both, and
 - (c) **the development will result in a building with a height of not more than 3.8m above the maximum permissible building height.**

As the site is zoned R4 High Density Residential in which residential flat buildings (RFBs) are permissible, section 87 applies to the development.

As shown on the extract of the Height of Buildings Map from Lane Cove Local Environmental Plan 2009 (LCLEP) applicable to the site provided as Figure 1 below, the subject site has two (2) applicable height limits, being Categories M and P2, which comprise heights of 12 and 18 metres respectively.

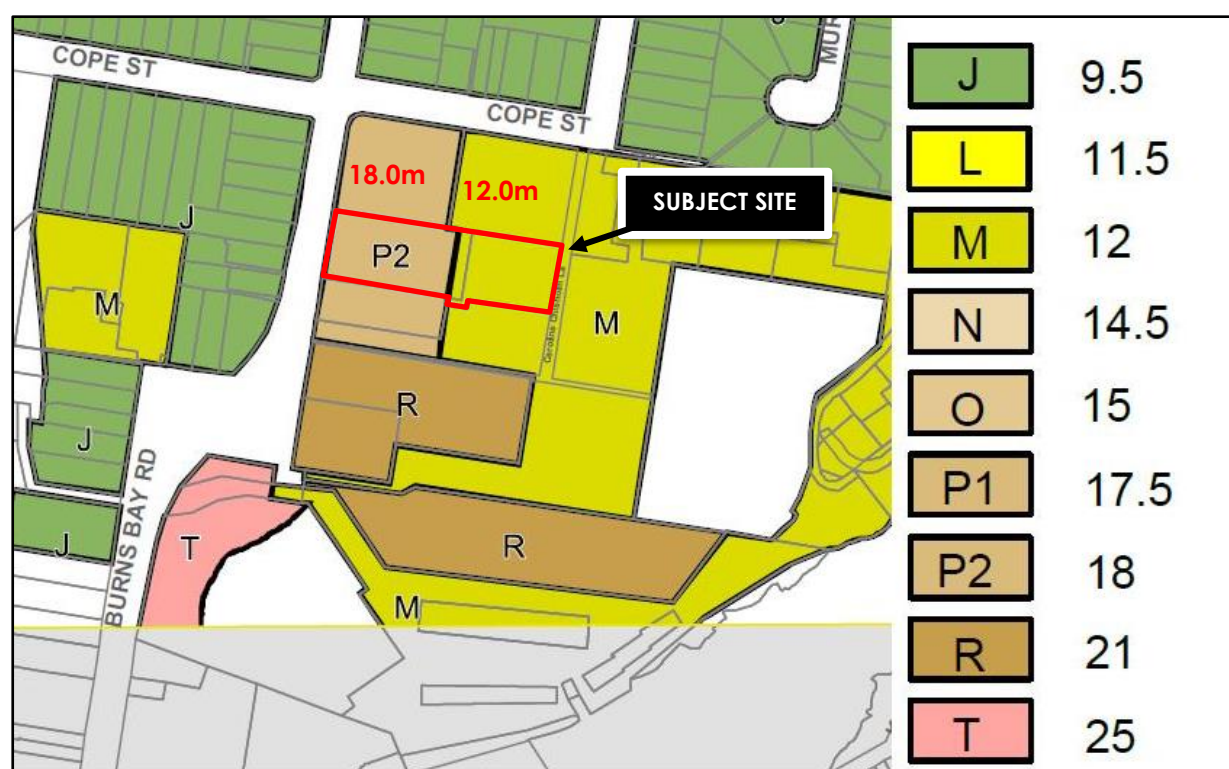


Figure 1 – Extract from Lane Cove LEP 2009 Height of Buildings Map

Under section 87(2)(c) of the Housing SEPP, a height bonus of **not more than 3.8m above the maximum permissible building height** – in conjunction with a floor space ratio (FSR) bonus of 15% as per section 87(2)(b)(i) – may be applied to development involving independent living units (ILUs) subject to the site meeting the criteria specified in sub-section (2)(a), that being a minimum area of at least 1,500m².

On the basis that the development comprises only ILUs and the site has an area in excess of 1,500m², a bonus of 3.8m is applicable to the proposed development, thereby increasing the maximum allowable heights of the proposed buildings on each lot comprising the site to **21.8m** for Building A on lot 120 and **15.8m** for Building B on lot 51 as follows.

- **Lot 120 (front lot):**
 - height under LCLEP = 18.0m (Category P2)
+ 3.8m BONUS = 21.8m
- **Lot 51 (rear lot):**
 - height under LCLEP = 12.0m (Category M)
+ 3.8m BONUS = 15.8m

Based on legal advice prepared by *Norton Rose Fulbright* accompanying this submission, it is evident that the reference to a 3.8m height bonus in section 87(2)(c) is a development standard and can therefore be varied via clause 4.6 of LCLEP.

THE OBJECTIVES OF THE DEVELOPMENT STANDARD

There are no objectives listed under Section 87 of the Housing SEPP. However an analysis of the explanation document that pre-empted the adoption of the Housing SEPP, as well as the principles of the Housing SEPP itself, provide an insight or general understanding of the likely objectives of Section 87.

In this regard, the document titled "*Housing SEPP consultation draft Plain English supporting document*" prepared by the (then) Department of Planning, Industry and Environment in July 2021 provided a summary of various elements of the draft version of *State Environmental Planning Policy (Housing) 2021* following its public exhibition. With respect to seniors housing, this document noted that "the requirements for vertical villages have been updated, including new FSR bonuses to **incentivise this form of development.**" As the additional height bonus flagged at that same time was intrinsically linked to the FSR bonus, it has been assumed that this statement also applied to height such that this additional 3.8 metres was also designed or introduced – in conjunction with the additional FSR – to incentivise seniors housing development.

Upon its gazettal, section 3 of the Housing SEPP identified a range of principals of the Policy. In amongst other principles – both generic and development (or housing type) specific – section 3(b) states as follows with respect to seniors housing:

The principles of this Policy are as follows—

- (b) **encouraging the development of housing** that will meet the needs of more vulnerable members of the community, **including** very low to moderate income households, **seniors and people with a disability,**

Given the above, it can be deduced that section 87 – and the FSR and height bonuses identified therein – has been included as a tool, or measure, to encourage or incentivise seniors housing development. Therefore, for the purpose of this analysis, the objective of the development standard adopted is that section 87 is to encourage or incentivise the development of seniors housing in higher density residential zones where residential flat buildings and shop top housing are permissible.

In addition, the application of a height bonus under section 87 also needs to be viewed, or applied, in the context of the overarching objectives of the building height development standard generally. To this end, clause 4.3(1) of LCLEP states that “the objectives of this clause are as follows:

- (a) *to ensure development allows for reasonable solar access to existing buildings and public areas,*
- (b) *to ensure that privacy and visual impacts of development on neighbouring properties, particularly where zones meet, are reasonable,*
- (c) *to seek alternative design solutions in order to maximise the potential sunlight for the public domain,*
- (d) *to relate development to topography.*

As such, in addition to the objective to incentivise the development of seniors housing in higher density residential zones, the objectives of the height standard under LCLEP are also relevant to the development standard in section 87, such that any additional height applied for, or sought, under section 87 would still need to result in, or facilitate, a development that achieves, each of the objectives listed (a) – (d) above.

THE NATURE OF THE DEPARTURE FROM THE DEVELOPMENT STANDARD

As shown on the various elevations, sections and height planes provided as part of the submitted plans, it is apparent the height of the actual buildings does not exceed either of the two (2) maximum height limits applicable to the site, inclusive of the bonus.

However, as specifically shown on Drawing No. DA-905 – 3D Height Plane Diagram, the lift overruns on Buildings A and B both exceed the height limit of 21.8m and 15.8m by 1.72m and 520mm respectively, or by **7.9%** and **3.3%**. The location of these encroachments is shown on Figure 2 on the following page.

AS SUCH, THIS SUBMISSION REQUESTS THAT THE TWO (2) MAXIMUM HEIGHT LIMITS – INCLUSIVE OF THE 3.8M HEIGHT BONUS – BE VARIED TO PERMIT THE EXCEEDANCES BY THE LIFT OVERRUNS.

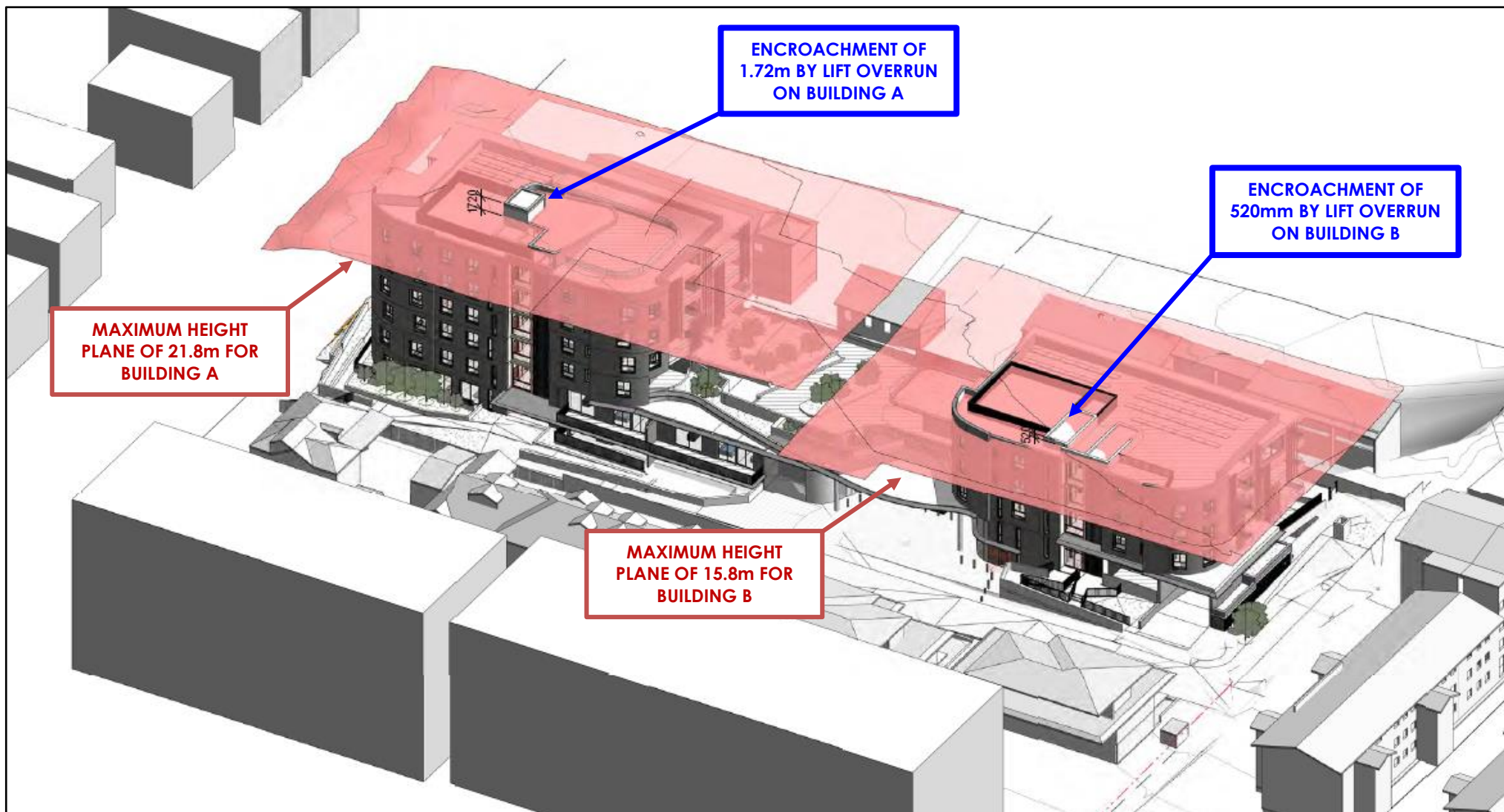


Figure 2 – Extract from 3D Height Plane Diagram showing location of height encroachments by lift overruns (Source: Jackson Teece Architects)

WHY COMPLIANCE WITH THE DEVELOPMENT STANDARD IS UNREASONABLE OR UNNECESSARY IN THE CIRCUMSTANCES OF THE CASE

The proposed variation from the 3.8m height development standard is assessed below against the accepted "5 Part Test" for the assessment of a development standard variation established by the NSW Land and Environment Court in *Wehbe v Pittwater Council* [2007] NSW LEC 82. While *Wehbe* related to objections made pursuant to *State Environmental Planning Policy No. 1 – Development Standards* (SEPP 1), the analysis is still deemed to be of assistance and hence applied to variations made under clause 4.6 (see *Four2Five Pty Ltd v Ashfield Council* [2015] NSWLEC 1009 at [61] and [62]).

In his decision in *Wehbe v Pittwater*, Chief Justice Preston expressed the view that there are five "tests" in which an objection may be well founded and that approval of the objection may be consistent with the aims of the policy. These tests are reasonable to consider in the request to vary the 3.8m height development standard in this instance and are discussed individually below.

Test 1 the objectives of the standard are achieved notwithstanding non-compliance with the standard;

Test 1 is of most assistance in this matter in establishing that compliance with a development standard is unreasonable or unnecessary and that "the objectives of the standard are achieved notwithstanding non-compliance with the standard".

Therefore and as explained above, it has been deduced that the objective of section 87 is to encourage or incentivise the development of seniors housing in higher density residential zones where residential flat buildings and shop top housing are permissible. It is considered that the proposed development meets this objective for the following reasons:

- Seniors housing has a greater spatial requirement – in the vicinity of 5 to 10% – than conventional residential apartments due to the need to be compliant with the Disability Discrimination Act and associated standards and guidelines with respect to circulation space in areas such as kitchens, bathrooms and hallways etc. This greater spatial requirement manifests itself into lower yields and greater costs and as such, additional floor space and in turn, additional height is necessary to offset this lower yield and higher cost to allow seniors housing to be a viable form of development and an alternative to residential apartments in higher density zones, which are more cost effective to build and yield greater returns.
- Seniors housing is accepted in the market as having a generally larger floor space and land take-up rate than conventional residential apartment development due to more onerous parking requirements identified under the Housing SEPP, whereby all car parking spaces must comply with the additional width requirements for disabled parking set out in AS 2890.6, with 10% having a further width requirement of 3.8 metres. As a result, a height bonus is a necessary incentive to offset the floor space and/or land lost to provide parking and hence encourage the development of seniors housing.
- The cost to construct a retirement village (in this instance, a vertical village) is significantly greater than conventional residential apartments as they include significant areas of non-revenue floorspace, such as on-site community facilities, communal open space and other items and services required on site by the Housing SEPP. Whilst these facilities and services are intrinsic to the value, amenity and liveability of these villages and assist in creating the community spirit sought after by residents, they are all cost-negative and contribute to the higher costs of seniors housing, such that a mechanism is required to increase yield to partially offset these costs and encourage the development of seniors housing when more cost efficient housing could be delivered to the market on any given site.

- Further to and essentially in summary of the above points, seniors housing providers cannot actively compete with developers of conventional residential apartments who are able to achieve higher yields and therefore higher returns and revenues when applying the same building heights (and floor space ratios). Therefore, in effect, the application of a height (and floor space ratio) bonus is essentially just “levelling the playing field” and making the provision of this type of housing a viable proposition (or alternative) in these zones where both forms of development are permissible).
- Providing an incentive for the development of seniors housing in the nominated zones has ongoing and community-wide benefits such as:
 - residents are able to use on-site facilities and hence travel off site less, thereby reducing traffic flows;
 - the provision of extensive on-site community facilities for the residents – in the form of libraries; dining areas and cafes; gyms, swimming pools and fitness areas; and substantial areas of communal open space – reduces demand on Council-provided community facilities; and
 - more local aged residents can remain independent and living within the local community, thereby maintaining existing social networks; and
 - greater housing choice is provided for aging residents within the Lane Cove LGA, consistent with the growing need for this type of housing identified in the North District Plan.

Further, it is considered that the proposed development – inclusive of the variation to the height bonus under section 87 – meets each of the objectives of the height of buildings standard of clause 4.3 of LCLEP as discussed below:

a. *to ensure development allows for reasonable solar access to existing buildings and public areas,*

- The built form comprises two slender buildings to both maximise solar access to apartments in the proposed development and minimise overshadowing of the neighbouring buildings to the south, such that the impact would be comparable to that of the impact of the existing buildings. In this regard, the shadow diagrams and the solar access impact plan included in the architectural plans show that the development to the south continues to meet the solar access requirements of the Housing SEPP and the ADG, wherein at least 70% of the dwellings on that property continue to receive at least 2 hours of sunlight between 9am and 3pm on the 21st June.

It is also noted that setbacks are compliant with Lane Cove Development Control Plan 2009 (LCDCP) except for the top two floors of Building A, where 6.0m is provided to the northern side instead of 9.0m, which has no impact on overshadowing given the shadow will be cast in the opposite direction. Conversely, a setback of 9.0m is provided to the southern side of both building on all levels which is in excess of LCDCP and SEPP 65 to maximise solar access to property to south as per this objective and ensure compliance with ADG.

Further discussion in relation to the shadow impact of the proposed development is provided in the SEPP 65 Design Verification Statement.

b. *to ensure that privacy and visual impacts of development on neighbouring properties, particularly where zones meet, are reasonable,*

- There is unlikely to be any impact of any note resulting from the proposed development either within the site or on surrounding properties due to:
 - the application of generous setbacks that are compliant with LCDCP except for the top two floors of Building A, where 6.0m is provided to the northern side instead of 9.0m to allow a setback of 9.0m to be provided to the southern side of both building

on all levels in excess of LCDCP and SEPP 65 to maximise solar access to property to south;

- the fact that the two levels with the reduced setback simply overlook the roof of the buildings opposite;
- the separation between Buildings A and B significantly exceeds the requirement between windows and balconies under the ADG;
- planter boxes are used for privacy to the lower levels apartments and vertical screens have been provided to the east and west facing apartments; and
- the careful location and orientation of windows and the use of different types of windows (e.g. highlight, hopper or clerestory).

Further discussion in relation to privacy and the specific measures the design has incorporated to minimise impacts from overlooking is provided in the SEPP 65 Design Verification Statement/ADG Table.

It is noted that the subject site and those immediately adjoining to the north, east and south (noting that the 4-lane Burns Bay Road adjoins the site to the west) are all zoned R4, such there is no meeting of zones.

c. to seek alternative design solutions in order to maximise the potential sunlight for the public domain,

- Not relevant. The site does not adjoin any public domain areas, such as parks, reserves or civic spaces whose solar access would be affected by the proposed development. As such, there are no additional or alternative design solutions required.

d. to relate development to topography.

- The design of the proposed development has had specific regard for and been informed by the topography of the site and responds accordingly. In this regard, the development has been broken into three separate components, or envelopes, comprising Building A, Building B and the central foyer connecting the two. Each of these envelopes sit at a different reduced level (RL) to follow the natural slope, address site conditions and allow natural ground levels to be maintained around the perimeter of the buildings and up to adjoining property boundaries. To this end, the location of the eastern envelope containing Building B has been determined by the level of the road providing access into the site, with the central envelope containing the foyer and porte-cochere approximately 2 metres lower. The western envelope containing Building A is a further 1.2m lower to take into account the drop in the levels of the site towards Burn Bay Road. This approach has minimised the need for retaining walls and avoids any adverse impacts on the significant trees on the property to the south and within the subject site to the north of the central foyer.

For the reasons outlined above, the objectives of the standard are considered to have been achieved notwithstanding the non-compliance. Therefore Wehbe Test 1 is satisfied.

The remainder of the Tests have only limited, if any, relevance to this variation request as indicated as follows:

Test 2 The underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary

As can be seen from the discussion above, it is considered that the proposed development is completely consistent with the objective of section 87 to specifically encourage seniors housing development on the land, such that strict compliance by the lift overruns with the 3.8m height bonus identified under section 87(2)(c) of the Housing SEPP can be considered unnecessary in this instance.

Test 3 The underlying object or purpose of the standard would not be defeated or thwarted if compliance was required.

Not applicable. The underlying object or purpose of the standard would not be defeated or thwarted if compliance was required, as height is still seen to be a reasonable measure to determine the bulk and scale of the proposed buildings, but:

- a. only in concert with a range of other applicable controls (such as setbacks, site coverage and FSR to a degree) and
- b. noting the need for flexibility in the application of such controls to encourage this specific form of housing in this particular zone.

Test 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.

From a review of Council's DA Tracking system, there is no evidence to suggest the development standard has been abandoned, although it appears there are a number of specific instances where Council has departed from the maximum height standard in the LGA over recent years for various and justifiable reasons, particularly for minor encroachments such as rooftop plantrooms and lift overruns as is the case here, as well due to the topography of various sites. As such, there is considerable justification for granting a consent which departs from the standard in this particular instance for the reasons outlined elsewhere in this submission.

Test 5 The zoning of the particular 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.

The rationale for the R4 zoning of this property and the surrounding area appears sound and not deemed to be inappropriate or in question. However, it is not understood why there is a difference in height on this site compared to those to the south, which have a greater height limit than the subject site – 21.0m and 24.0m as shown on Figure 1 – despite having the same R4 zoning. Hence the application of a height bonus as provided for by section 87 of the Housing SEPP merely brings this site into compliance, or consistency, with the sites to the south.

THE ENVIRONMENTAL PLANNING GROUNDS WHICH JUSTIFY CONTRAVENING THE DEVELOPMENT STANDARD IN SECTION 87 OF THE HOUSING SEPP

In response to clause 4.6(3)(b), sufficient environmental planning grounds exist to justify departure from the development standard by the lift overruns on this occasion as follows:

- The built-form of the proposed development is completely appropriate given the height of both buildings complies with the two (2) maximum height limits applying to the land, other than the two (2) lift overruns in question.
- The lift overrun on Building B is essentially indiscernible from both the northern and southern sides of the site as shown on the northern and southern elevations of Building B provided as Figures 3 and 4 on the following page respectively.

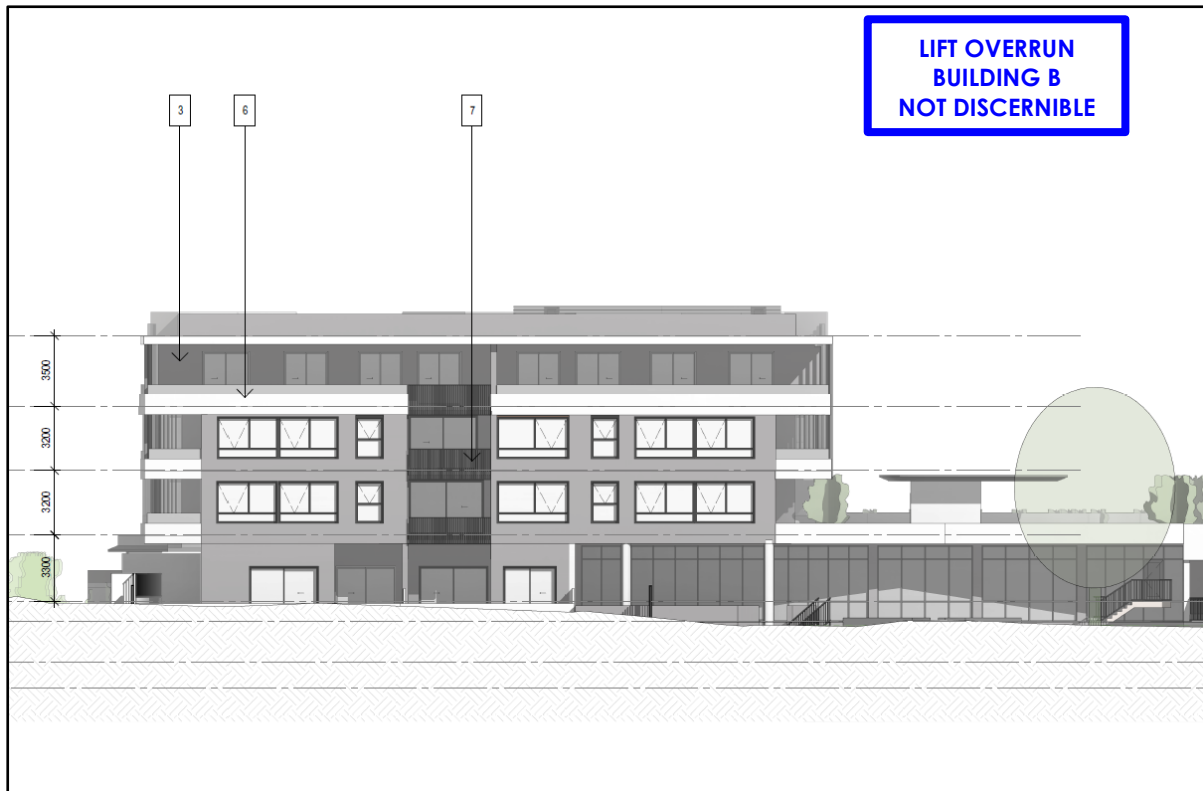


Figure 3 – Northern elevation Building B

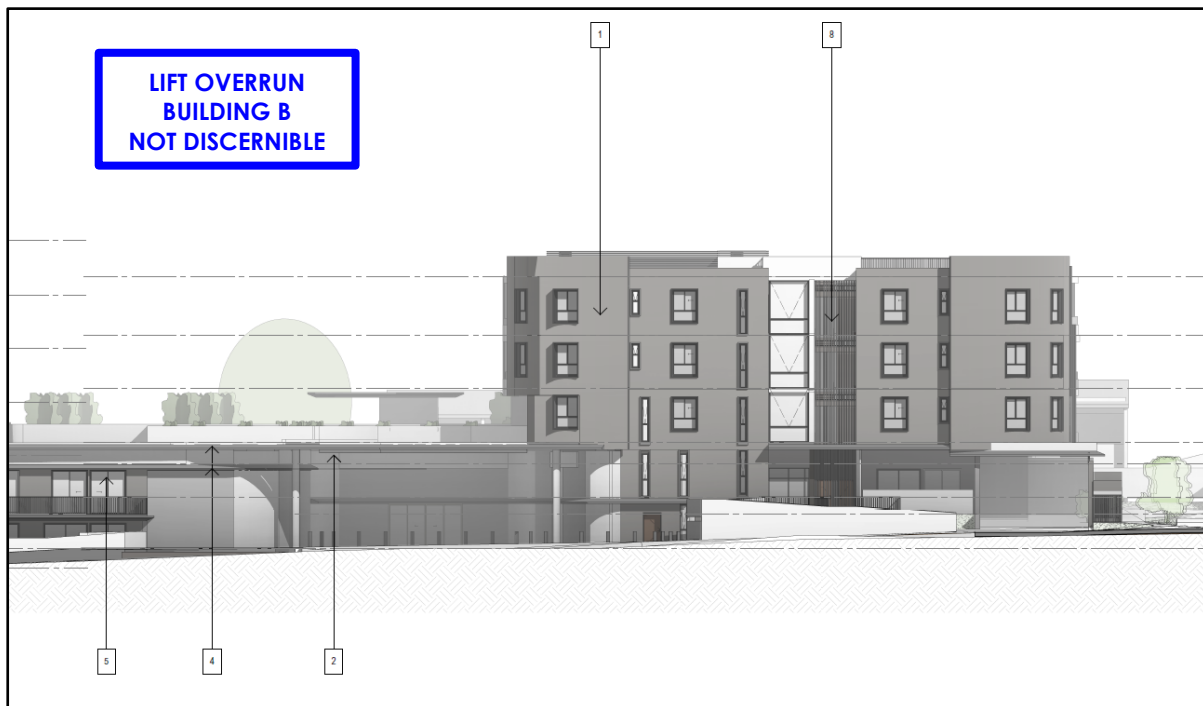


Figure 4 – Southern elevation Building B

- The lift overruns have been treated architecturally and form an integrated part, or extension, of the roof. In this regard, the two overruns in question form a decorative element as opposed to appearing as, or looking simply like, a piece of plant. This is evident from a review of the western and northern elevations of Building A shown as Figures 5 and 6 below and from a review of the eastern elevations of Building B shown as Figure 7 on the following page.

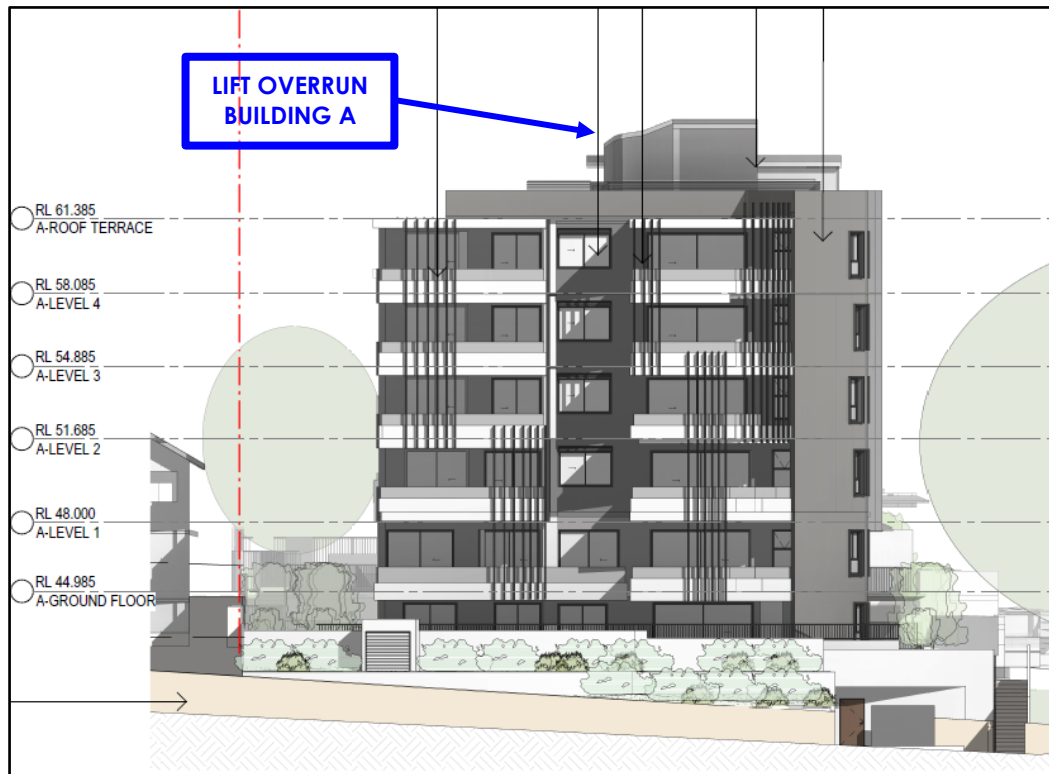


Figure 5 – Western elevation (from Burns Bay Road) Building A



Figure 6 – Northern elevation Building A



Figure 7 – Eastern elevation Building B

- The two roof features do not include, and are not capable of, including any floor space and hence have not been included to increase yield.
- The additional overshadowing created by the roof features is negligible. In this regard, there is essentially no additional shadow created by the roof feature on Building B given that it does not protrude above the line of the top of the building. This is also the case for Building A where the extent of the overrun visible from the southern elevation – and hence the extent of overshadowing caused by its additional height – is extremely limited and essentially intangible.

THE PUBLIC INTEREST, CONSISTENCY WITH THE OBJECTIVES OF THE DEVELOPMENT STANDARD AND THE OBJECTIVES FOR DEVELOPMENT WITHIN THE R4 GENERAL RESIDENTIAL ZONE

The Public Interest

The proposed development, inclusive of the minor variations to the height limit by the lift overruns, is considered to be in the overall public interest as it will:

- provide additional seniors housing to the local housing market to assist in meeting the ongoing and increasing demand for such housing in the Lane Cove area;
- provide a significant increase in the availability of high-quality seniors housing product to the market in a premium location;
- enable more local residents to remain independent but living within the local community and maintaining existing social network;
- increase residential densities and housing choice in an established location that is close to public transport;
- provide high quality independent living style housing with good accessibility to the Figtree local centre and to bus transport connecting to inner northern Sydney and the City;
- significantly improve the appearance and built-form of this site and the Burns Bay Road streetscape; and
- generate section 7.11 contributions which will, in combination with other monies collected by Council from other developments, be used for a range of improvements to local

infrastructure and the provision and embellishment of public reserves and community facilities in the surrounding area.

Objectives of the Development Standard

As discussed in detail in the preceding section of this Submission, the proposed development is consistent with the relevant objectives of the development standard requested to be varied.

Consistency with Zone Objectives

The proposed development is entirely consistent with the objectives of the R4 zone. In this regard, the objectives of the R4 zone (where relevant to residential development) are identified below, with a comment provided immediately following to demonstrate how the proposed development is consistent with each:

- *To provide for the housing needs of the community within a high-density residential environment.*
- The proposed development provides housing needs for the local community in a vertical, high density retirement village and in doing so, will assist in meeting a shortage of senior's accommodation in the Lane Cove LGA.
- *To provide a variety of housing types within a high-density residential environment.*
- The proposed development provides an alternate type of retirement living in the form of a vertical village and hence contributes to the variety of seniors housing product available in the Lane Cove LGA.
- *To provide for a high concentration of housing with good access to transport, services and facilities.*
- The proposed development is located in close proximity (400m) to the Lane Cove West shopping centre and community precinct, and is highly accessible to an extensive range of retail, community, commercial services and facilities via public transport to the Lane Cove town centre and Hunters Hill village centre.
- *To ensure that the existing amenity of residences in the neighbourhood is respected.*
- The proposed development has been designed and sited to avoid any significant adverse impact on the amenity of surrounding residences by way of overshadowing, diminished privacy or view loss, as discussed in greater detail above, in the SoEE and the SEPP 65 Design Verification Statement accompanying the DA.
- *To avoid the isolation of sites resulting from site amalgamation.*
- The subject site comprises two (2) allotments that combine to provide a large, amalgamated site of a regular shape that facilitates the proposed development and in doing so, does not isolate any surrounding properties nor compromise the future development potential of these properties
- *To ensure that landscaping is maintained and enhanced as a major element in the residential environment.*
- The site will be extensively landscaped, inclusive of the planting of large trees within deep root zones around the buildings to provide appropriate shading, softening and scaling of the development, as well as the planting of smaller trees, shrubs and hedges within private terraces, garden beds, planter boxes and communal areas to provide privacy and amenity for residents.

CONCLUSION

It is clear from the above discussion that the minor variations sought to the height limit applicable to the land under section 87(2)(c) of SEPP (Housing) 2021 is justified for a range of economic, siting, design, amenity and environmental planning reasons. The proposed variation is therefore consistent with clause 4.6 of LCLEP, which provides an appropriate degree of flexibility in the application of development standards to permit a particular development where warranted. To this end, the preceding submission satisfies the considerations requiring assessment in sub-clause (3) and demonstrates as follows:

1. strict compliance with the development standard is unreasonable or unnecessary in the circumstances of the case;
2. there are sufficient environmental planning grounds to justify contravening the development standard;
3. the proposed development will be in the public interest because it is consistent with the objectives of the development standard and the objectives of the R4 zone in which the development is proposed to be carried out; and
4. departure from the standard will achieve an improved built-form outcome, have a negligible impact on surrounding properties and will not raise any matter of significance for state or regional environmental planning.

Therefore, the request for a departure from the building height development standard referenced under section 87(2)(c) of SEPP (Housing) 2021 to permit the proposed development is considered worthy of support.

Tim Shelley

Director – Tim Shelley Planning



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