



CLAUSE 4.6 VARIATION REQUEST

STAGES TWO AND THREE RESIDENTIAL SUBDIVISION AND ASSOCIATED WORKS

DA/2022/1279/1

NORTH WILTON PRECINCT



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Planning

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Suite 304, 171 Clarence Street, Sydney NSW 2000
Phone 02 9290 3636

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Prepared for:

Landcom

14/60 Station St E,
Parramatta NSW 2150

Prepared by:

Design+Planning

Suite 304, 171 Clarence Street
SYDNEY NSW 2000

P: (02) 9290 3636

E: admin@designandplanning.com.au

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1 INTRODUCTION

This clause 4.6 variation request has been prepared on behalf of Landcom as part of a Request for Information for DA/2022/1279/1, which seeks approval for Stages 2 and 3 of the North Wilton Precinct. The proposed works include:

- The staged subdivision of the site for the following:
 - 318 residential allotments
 - 4 superlots, which are intended to incorporate small lot housing/medium density development (subject to a separate DA)
 - 6 residue lots, for future open spaces, a sewer pump station and one playing field;
- Water cycle management infrastructure;
- Construction of the local road network;
- Public domain landscaping works; and
- Delivery of essential infrastructure and services associated with the delivery of new homes.

The subject site is situated within the North Wilton Precinct of the Wilton Growth Area. Accordingly, the State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (the WPC SEPP) is the primary Environmental Planning Instrument applying to the site.

Clause 4.6 of Appendix 8 North Wilton Precinct Plan in the WPC SEPP allows the consent authority to approve a development which contravenes a development standard. The objective of this clause is to provide an appropriate degree of flexibility in applying certain development standards to particular development and to achieve better outcomes for and from development by allowing flexibility in particular circumstances.

This clause 4.6 variation request has been prepared to address the minor variation from the minimum residential density requirements outlined in clause 4.3A (2)(a) of Appendix 8, which is a result of an adjustment to the Net Developable Area (NDA) calculation requested by Wollondilly Shire Council.

Accordingly, this report and the supporting plans demonstrate that the minor residential density variation proposed by the Development Application (DA) are justified due to the specific circumstances.

It is noted the Department of Planning and Environment's reformed *Guide to Varying Development Standards* came into effect on 1 November 2023, however as DA/2022/1279/1 was lodged prior to this date, the Planning Circular PS 20-002 dated 5 May 2020, and *A Guide on Varying Development Standards 2011* remains in effect for this application.

2 SITE CONTEXT AND ANALYSIS

The North Wilton Precinct is located within the Western District of the broader Sydney Metropolitan Region, within the Local Government Area of Wollondilly Shire Council. The North Wilton forms a major component of the Wilton Growth Area (WGA), located on the southern extent of identified future urban growth in south west Sydney.

By road the Precinct is 85km south-west of the Sydney CBD, 31km north-west of Wollongong and 7km east of the Picton township. The future Campbelltown-Macarthur Strategic Centre is 29km to the north-east of the Precinct. The Precinct is located on the interchange with the Hume Highway, which provides connection to the major metropolitan road network throughout Sydney, and Picton Road which provides a direct connection to Wollongong and Port Kembla to the south-east. The Hume Motorway connects to the Southern Highlands, Canberra and Melbourne to the south-west.

The general arrangement of land uses within the Precinct is guided by the North Wilton Structure Plan. The UD zone provides the flexibility that will enable the delivery of North Wilton Precinct, while the Structure Plan provides guidance on the general land use configuration that will facilitate the creation of a vibrant and connected residential community with access to a variety of employment opportunities, leisure activities and housing diversity.

Stage 2-3 is located within a discrete catchment of the broader North Wilton Precinct, generally bound by the proposed north-south and east-west Sub-arterial Road, the Hume Motorway and conservation land.

This proposal seeks approval for 318 residential lots that are within the 'low density' area of the Structure Plan. In addition to the residential allotments, the proposal will deliver open space for the new community as well as establishing the superlots that will accommodate the future small lot housing/medium density development.

The application area subject to works under this DA is located within south-eastern portion of North Wilton Precinct (refer to Figure 1) and incorporated land within Lots 1 & 3 in DP 1280088 (refer to Figure 2).

Figure 1: Location of subject site within the North Wilton Precinct

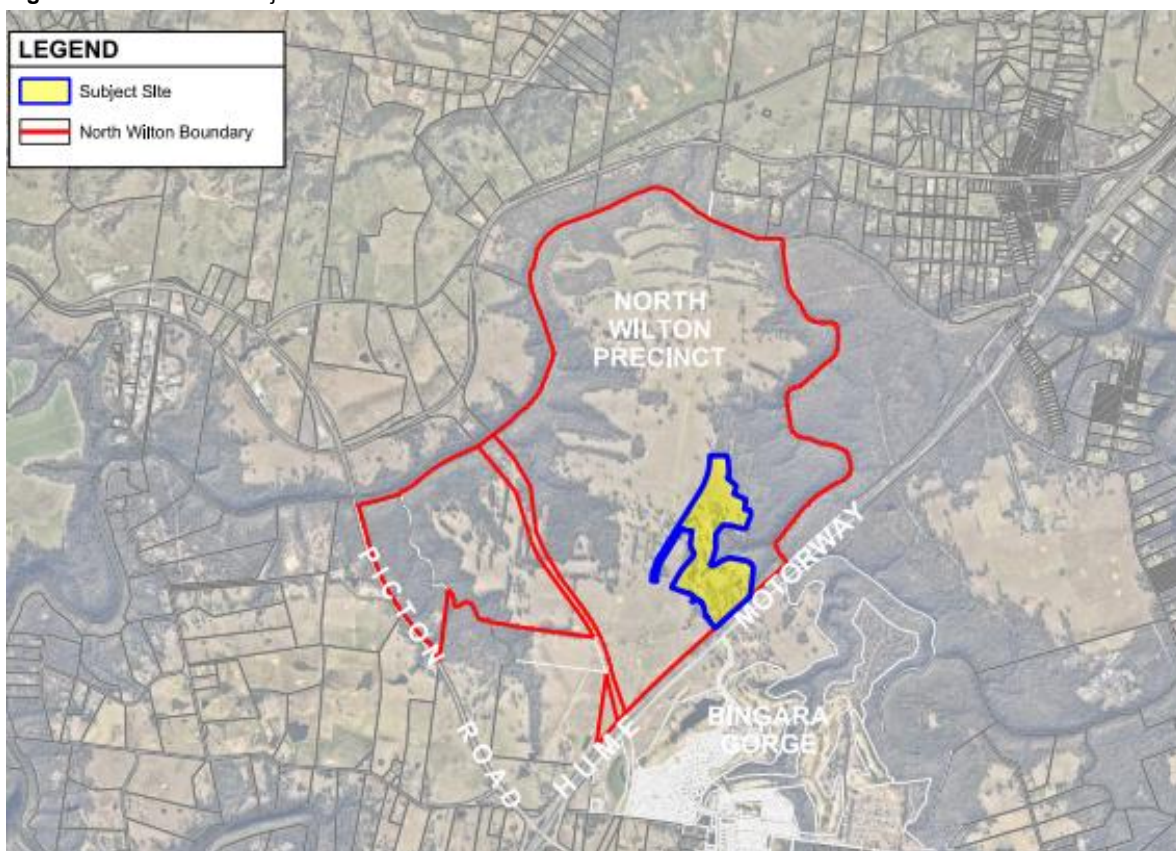
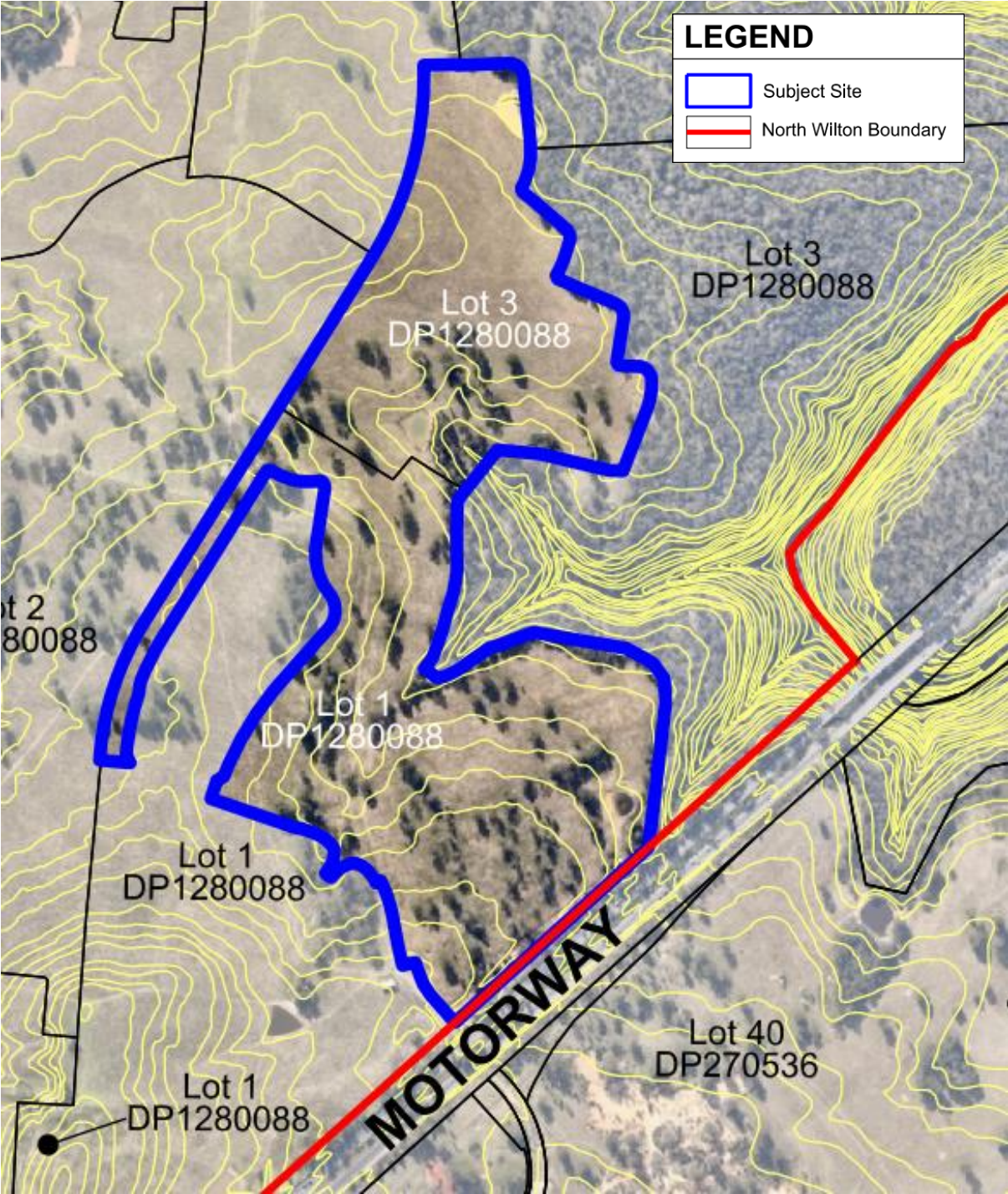


Figure 2: Site Plan



3 PROPOSED VARIATION

DA/2022/1279/1 seeks approval for subdivision and works associated with the delivery of Stages 2 and 3 of the North Wilton Precinct. The proposal includes four superlots for future medium density dwellings, 6 residue lots for drainage and open space, and 318 residential allotments.

The 318 low-density residential allotments have a total NDA of 21.8603 hectares, achieving a density of 14.54 dwellings per hectare.

Clause 4.3A Residential density of Appendix 8 North Wilton Precinct Plan in the WPC SEPP states the following:

- (1) *The consent authority must not grant development consent to development that results in more than 5,600 dwellings on the land to which this Precinct Plan applies.*
- (2) *The consent authority must not grant development consent to development on land if the development will result in the density of—*
 - a. ***dwelling houses and dual occupancies being 15 or fewer dwellings per hectare of the land or exceeding 25 dwellings per hectare of the land, or***
 - b. *residential flat buildings, multi dwelling housing, mixed use development and shop top housing being 25 or fewer dwellings per hectare of the land or exceeding 45 dwellings per hectare of the land, or*
 - c. *attached dwellings being 15 or fewer dwellings per hectare of the land or exceeding 45 dwellings per hectare of the land.*
- (3) *Subsection (2) does not prevent a subdivision that provides for individual dwellings to be on separate lots if the consent authority is satisfied that the subdivision does not also involve the creation of additional dwelling entitlements.*
- (4) *This section has effect despite anything to the contrary in any other provision of this Precinct Plan.*
- (5) *In this section—*
density *means the ratio of the number of dwellings to the area of the land to be occupied by the development, including internal streets and half the width of any roads adjoining the development that provide vehicular access to the development but excluding land used for non-residential purposes.*

The original application determined the density of the development through an analysis of the net developable area (NDA) based on the definition provided in Clause 4.3A(5) and general industry practice was undertaken. It was proposed that areas affected by the Asset Protection Zone (APZ) be excluded from the NDA calculation since the APZ places a restriction on the development of the land for residential development. Using this method, the density achieved by the low density component of the development was 16.5 dwellings per hectare. However, Council did not support this approach and the matter was raised in the Request for Information (RFI) dated 7 February 2023.

A review of the NDA plan was undertaken as result of Council's comments, as well as amendments to the road network driven by the application of WSUD within the subdivision. On the draft revision, the APZ area was still considered to effectively remove the ability for residential development within the affected area, however it considered Council's comments in relation to the inclusion of half-roads to access the lots. The revised approach included in the NDA the 4.5m setback typically applicable to the front of lots, as well as the equivalent of the half-width of the road from the APZ line. This was to ensure the NDA consistent with what is typically included as part of the calculation and resulted in the density decreasing to 15.02 dwellings per hectare. Council did not support approach either due to other non-habitable structures and land uses being permitted within the APZ, such as carports and garages.

Accordingly, the final revision of the NDA plan has been prepared using the standard calculation method, extending the NDA to the boundary road centreline. This increases the NDA to 21.8603 hectares and decreases the residential density to 14.54 dwellings per hectare (refer to Figure 1).

This clause 4.6 variation request seeks to contravene the minimum residential density of 15 dwellings per hectare as it cannot be achieved within the proposed subdivision as outlined below.

LEGEND

- [Black Line] Site Boundary
- [Red Line] Bushland Boundary
- [Blue Line] Stage Boundary
- [Dashed Blue Line] APZ
- [Light Orange Fill] Standard Residential
- [Dark Orange Fill] Medium Density Residential

Low Density	
Total NDA	21.8603ha
No. of Dwellings	318
Density	14.54 dwellings/ha

Medium Density	
Total NDA	5.3741ha
No. of Dwellings	138
Density	25.67 dwellings/ha

The site plan shows several development stages and specific lots:

- STAGE 1:** Includes a School Site and two Superlots.
- STAGE 2A & 2B:** Located at the bottom right, adjacent to HUME HIGHWAY.
- STAGE 3A, 3B, & 3C:** Located in the upper central part of the plan.
- Lots and Areas:**
 - Residue Lot 2154
 - Residue Lot 2153
 - Residue Lot 2152
 - Residue Lot 2151 (0.429ha)
 - Residue Lot 2153 (3.6402ha)
 - Residue Lot 2149
 - Total Lot 2152 Area: 0.9422ha (including basin), 0.8115ha (excluding basin)
 - Total Lot 2149 Area: 2.2835ha (including basin), 1.7437ha (excluding basin)

4 JUSTIFICATION

Clause 4.6 Exceptions to Development Standards of Appendix 8 North Wilton Precinct Plan provides opportunity for the standards to be varied and provides flexibility in the application of certain development standards.

An assessment of proposed variation against each of the criteria in clause 4.6 is provided in Table 1 below.

Table 1: Clause 4.6 Response

CLAUSE	RESPONSE
<i>(2) Development consent may, subject to this section, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However, this section does not apply to a development standard that is expressly excluded from the operation of this section.</i>	Clause 4.3A Residential Density is not expressly excluded from the operation of clause 4.6, therefore the proposed variation is permissible.
<p><i>(3) Development consent must not be granted for development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating—</i></p> <p><i>(a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and</i></p>	<p>There has been numerous case law pertaining to whether compliance with the development standard is unreasonable or unnecessary. The most common case law is <i>Wehbe v Pittwater Council</i> [2007] NSW LEC 827, which established five ways to address clause 4.6(3)(a), including the following:</p> <ol style="list-style-type: none"> 1. The objectives of the development standard are achieved notwithstanding non-compliance with the standard. 2. That the underlying objective or purpose is not relevant to the development 3. That the underlying objective or purpose would be defeated or thwarted if compliance was required 4. The development standard has been virtually abandoned or destroyed by Council's own actions in granting consents departing from the standard 5. That the zoning of the land on which development is proposed was unreasonable or inappropriate. <p>Only one part of the above is required to be addressed. As such, this variation request seeks to address Part 1 of the test.</p> <p>Clause 4.3A of the SEPP does not provide any objectives that unpin the controls. However, it is necessary to assume that the underlying intent or purpose of the density clause, much like the provisions under other SEPPs relevant to Growth Areas is to:</p> <ul style="list-style-type: none"> • Ensure that residential development makes efficient use of land and infrastructure, and contributes to the availability of new housing, • Ensure that the scale of residential development is compatible with the character of the precinct and adjoining land. <p>The proposed contravention to the minimum density does not result in an outcome that is contrary to the above purpose of the density clause.</p> <p>Further, it is necessary to look at the objectives of residential density under the Wilton Growth Area DCP 2021 (which supports the SEPP development standards). It lists the following:</p> <ol style="list-style-type: none"> 1. Ensure that resulting lots have a practical and efficient layout to meet the intended land use. 2. Encourage a variety of lot sizes, type and design to promote housing choice, create attractive streetscapes with distinctive characters, enhance walkability and improve access to services.

	<p>3. Ensure that subdivision proposals are responsible to constraints of the land and maintain streetscape integrity.</p> <p>The proposed contravention to the development standard is not contrary and comfortably meets the above objectives given the reasons set out below.</p> <p>Clause 4.3A(2)(a) Residential Density of Appendix 8 applies a 15 dwelling per hectare minimum density requirement for dwelling houses and dual occupancies in North Wilton.</p> <p>The subdivision design for Stages 2-3 was finalised in accordance with input from Council and the NSW Rural Fire Service (RFS). The design of the roads and residential allotments along the boundary with the adjoining environmental conservation land was thoroughly deliberated to ensure an appropriate interface is achieved, particularly due to the required APZ. The final design includes perimeter roads along the entire length of the interface to capture much of the APZ and residential lots have been elongated in areas where the APZ extends substantially beyond the road into the subdivision.</p> <p>This allows adequate room for the dwelling to be set back from the APZ, however it results in these lots increasing in area due to the incorporation of a significant amount of constrained land at the front. Further, the meandering boundary of the subdivision with the environmental conservation land produces an extensive interface with 70 lots being partially within or directly adjacent to the APZ. For this reason, the Stage 2-3 subdivision includes considerably more lots exceeding 500m² than a typical low-density residential subdivision, resulting in the density being less than the minimum specified in the WPC SEPP.</p> <p>The circumstances of this contravention are unique as there are few areas within any other of the Sydney Growth Centres where new subdivisions are impacted by large APZs (such as the 29m and 56m APZs that interface the eastern edge of Stages 2-3). As demonstrated on the initial NDA plan submitted, excluding the APZ area from the NDA results in a dwelling density of 16.51 dw/ha. Even with the addition of half the width of the perimeter roads and the standard 4.5m setback, the NDA still achieves 15 dw/ha. Therefore, the portion of the subdivision where residential development is permissible is consistent with the minimum density requirement and the inconsistency arises due to the inclusion of 1ha of APZ land within residential allotments.</p> <p>To achieve at least 15 dw/ha, 10 additional low density lots would need to be provided within the subdivision. The only way of achieving this would be to divide the larger lots to increase the yield. This has been contemplated, however it not considered to result in a favourable outcome as it would require the provision of 10m wide lot product to add to the 12.5, 15 and 18m product. This is not consistent with the desired housing product which seeks to provide people with housing choice nor is it consistent with the character of the Stage 2-3 subdivision area as envisioned and planned for under Neighbourhood Plan 1.</p>
<p><i>(b) that there are sufficient environmental planning grounds to justify contravening the development standard.</i></p>	<p>The Court during <i>Four2Five Pty Ltd v Ashfield Council</i> [2015] NSWLEC 90 noted that the written request to address Clause 4.6(3)(b) must focus on the aspect or element of the development that contravenes the control, not on the development as a whole and why that contravention is justified on environmental planning grounds.</p> <p>It is considered that there are sufficient environmental planning grounds to further justify contravening the residential density standard in this instance.</p> <ul style="list-style-type: none"> • The DA proposes a minor variation to the minimum residential density requirement for dwelling houses, being 14.54 dw/ha. This is only 0.45 dw/ha short of the requirement which equates to approximately 10 additional dwellings, or a 3% numerical variation to the minimum 15 dw/ha. • The site is constrained by large APZ distances of between 29m and 56m, which is a requirement under Planning for Bushfire Protection 2019. This has resulted in the siting of the large lots facing the bushland / environmental conservation area, and as such, being the transition zone to the lower density residential in

	<p>the remainder of the stages (particularly stage 2). The siting of the larger lots which contributed to a lesser yield has been envisioned under the Neighbourhood Plan 1.</p> <ul style="list-style-type: none"> • The proposed variation will not generate any adverse social, environmental or economic environmental impacts than if the minimum density was met. • The contravention results in keeping with the envisioned character and urban design outcome of the streetscapes in the stages. Strict compliance would result in less variety of lot sizes, including an increase in 10m lot frontages, and a decrease in 12.5m and 15m lot frontages, restricting the ability to provide people with greater supply of larger lots than usually found within Growth Areas. Unlike typical EPI standards, clause 4.3A Residential Density does not include any objectives as noted previously. However, subsection (1) of clause 4.3A states the following: <i>(1) The consent authority must not grant development consent to development that results in more than 5,600 dwellings on the land to which this Precinct Plan applies.</i> <p>Ensuring consistency with this standard is most crucial for development within North Wilton as it ensures that, upon completion the population of the Precinct is appropriate for the services and infrastructure being provided.</p> <p>The proposed variation contributes to the achievement of this standard as the shortfall of 10 dwellings within Stages 2-3 provides opportunity to account for potential surplus dwellings from future development within the Precinct.</p>
<p><i>(4) Development consent must not be granted for development that contravenes a development standard unless—</i></p> <p><i>(a) the consent authority is satisfied that—</i></p> <p><i>(i) the applicant's written request has adequately addressed the matters required to be demonstrated by subsection (3); and</i></p>	<p>The assessment provided above is considered to adequately address the required matters detailed in clause 4.6(3).</p>
<p><i>(ii) the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out, and</i></p>	<p>As noted above, clause 4.3A does not include any specific objectives. However, it does include a requirement that the North Wilton Precinct must not exceed 5,600 dwellings, which seeks to restrict the overall yield, but does not directly relate to the minimum density provision.</p> <p>Further, the objectives of the UD Urban Development zone seek to encourage the development of well-planned and well serviced new urban communities and to ensure land adjacent to environmental conservation areas is developed in a way that enhances biodiversity outcomes for the Precinct.</p> <p>Therefore, the proposed variation is in the public interest as it seeks to prevent the Stage 2 and 3 Subdivision from including at least 10 additional dwellings. Maintaining the current proposed density of 14.54 dw/ha allows for the creation of unique, spacious neighbourhoods which harmoniously blend with the adjoining bushland. Larger low density residential lots are becoming increasingly rare within the Sydney region, therefore this subdivision has been intentionally designed to contribute to housing diversity and catering to those seeking land for a larger home and/or yard.</p> <p>Further, as this subdivision is at the interface with the conservation land, larger lots are more appropriate as it provides a better transition between the natural and built environment. Reducing lot sizes to increase the yield will lessen the area available for tree planting within the development area, preventing good biodiversity outcomes.</p>

	<p>Likewise, lower dwelling density in the vicinity of bushland is favourable from a bushfire safety perspective. This reduces the number dwellings at the greatest risk and the amount of people requiring evacuation from high hazard areas, while the larger lot sizes also lessens the likelihood of building-to-building fire spread.</p> <p>Additional assessment of the inconsistency against the objectives of the UD zone is provided below.</p>
<i>(b) the concurrence of the Secretary has been obtained.</i>	In accordance with the Assumed Concurrence Notice accompanying Planning Circular PS 20-002, consent authorities (including Sydney planning panels) may assume the Secretary's concurrence if a development does not contravene a numerical standard by greater than 10%. The 14.54 dw/ha vs 15 dw/ha is only a variation of 3%.
<p><i>(5) In deciding whether to grant concurrence, the Planning Secretary must consider—</i></p> <p><i>(a) whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and</i></p>	<p>The contravention is a minor shortfall in dwelling density within the proposed subdivision and will not result in any matters of significance for State or regional environmental planning.</p> <p>The variation is required as the development area is significantly constrained by an APZ, which has resulted in larger than average lot sizes and a low residential dwelling density.</p>
<i>(b) the public benefit of maintaining the development standard, and</i>	<p>Maintaining the minimum 15 dw/ha standard would have little public benefit in this instance. While it would result in at least 10 additional dwellings, it would impact the diversity of lot size and housing typologies offered within the subdivision by increasing the number of smaller 10m lot product.</p> <p>Given the unique context of the North Wilton Precinct on the far fringes of the metropolitan area and its setting amongst bushland, a minor shortfall in housing in Stage 2 and 3 subdivision is an insignificant matter. While medium density development is proposed in certain high amenity areas, the North Wilton Precinct is predominantly low density and offers a greater proportion of larger lots than in other Growth Centre Precincts, particularly those closer to existing urban areas.</p> <p>Maintaining the development standard in this instance would result in a decrease of larger low density lots within North Wilton, which are less commonly offered in the Sydney region. Therefore, there is greater public benefit by contravening the minimum residential density standard. The larger lots are also commensurate to the character of the streetscape of where they are located, by facing the adjoining bushland.</p>
<i>(c) any other matters required to be taken into consideration by the Planning Secretary before granting concurrence.</i>	No such matters have been identified.

4.1 OBJECTIVES OF THE ZONE

The Stage 2-3 subdivision is located within the UD Urban Development zone, as shown in Figure 3 below. The land to immediate east of the site is zoned C2 Environmental Conservation, while the Hume Motorway along the south-eastern boundary is zoned SP2 Instructure.

The objectives of the UD Urban Development Zone are:

- *To manage the transition of land from non-urban uses to urban uses.*
- *To encourage the development of well-planned and well-serviced new urban communities in accordance with the North Wilton structure plans.*

- *To ensure a range of uses, and uses located in a way, that are consistent with the strategic planning for the North Wilton Precinct.*
- *To safeguard land used for non-urban purposes from development that could prejudice the use of the land for future urban purposes.*
- *To ensure that land adjacent to environmental conservation areas is developed in a way that enhances biodiversity outcomes for the Precinct.*

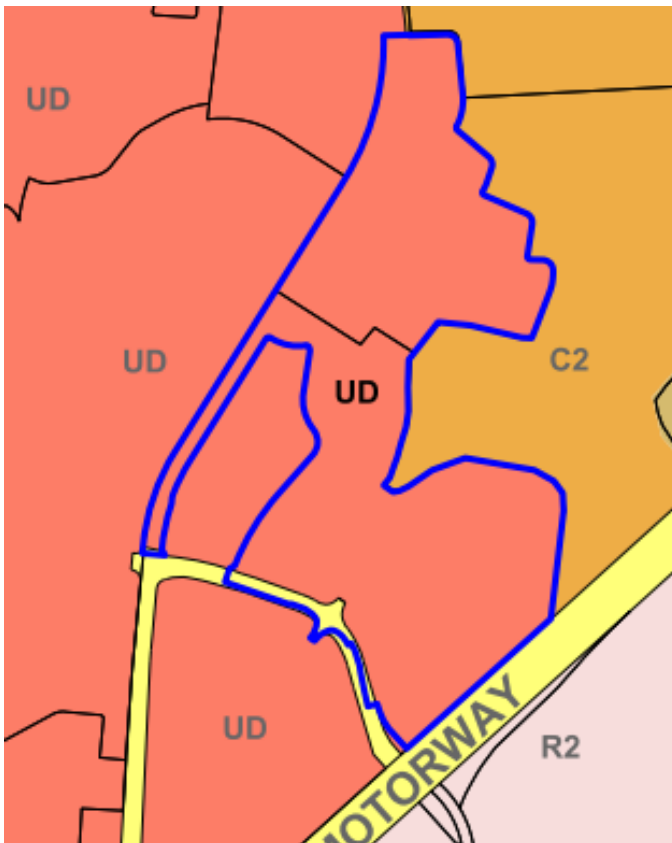
The proposed development achieves the objectives of the zone through the provision of a land use pattern consistent with the Neighbourhood Plan applying to Stage 2-3, which is serviced and allows for the orderly delivery of urban land uses. The proposed development consists of uses that are not identified as prohibited development under the land use table, therefore the proposed development is permissible within the UD zone.

The proposed minor variation from the minimum density requirement does not impact the consistency of the development with zone objectives or the permitted land uses. As discussed above, when excluding the APZ land from the NDA, the Stage 2-3 subdivision meets the minimum residential density requirement.

The variation is necessary to avoid altering the desired character of the subdivision through the addition of at least 10 more dwellings. This would require a greater number of 10m lot product, resulting in a more urbanised and less spacious atmosphere and less housing diversity.

Further, maintaining larger lots within Stages 2-3 aligns with the fifth objective of the UD zone as it seeks to create an appropriate transitional area between higher density areas and the conservation land. The larger lots within the subdivision will enable the planting of larger tree, more landscaped areas and less impermeable surfaces, which will provide habitat for fauna and enhance the value of the adjoining bushland.

Figure 3: Zoning Plan



5 CONCLUSION

This request for a variation to clause 4.3A Residential Density of Appendix 8 North Wilton Precinct Plan in the *State Environmental Planning Policy (Precincts—Western Parkland City) 2021* has been prepared to accompany DA/2022/1279/1, which seeks approval for subdivision and associated works within Stages 2 and 3 of the North Wilton Precinct in the Wilton Growth Area.

Following an adjustment to the NDA plan to include APZ impacted land as requested by Wollondilly Shire Council, the residential dwelling density of the proposal falls to 14.54 dwellings per hectare, marginally below the minimum requirement of 15 dwellings per hectare for low-density developments within the North Wilton Precinct.

There are various planning grounds for the proposed variation to the development standard. As outlined in this report, this contravention has unique circumstances as the minimum dwelling density is achieved when APZ land is excluded.

To achieve the minimum density requirements, at least 10 additional lots will need to be incorporated into the subdivision. This would impact the desired character of the subdivision and impact the diversity of lot and housing product delivered in the North Wilton Precinct by reducing the yield of large lot typologies.

The proposed variation is in the public interest as it seeks to ensure that a substantial number of larger lot typologies are delivered in a true low-density, spacious bushland neighbourhood, which is an increasingly rare housing and lifestyle offering. Likewise, the variation is also in the interest of the environment as maintaining the subdivision layout as proposed will ensure the development can accommodate the planting of large trees and vegetation to enhance the adjoining conservation land and provide habitat for fauna.

The proposed variation has been prepared in accordance with the provisions of *Clause 4.6 Exceptions to Development Standards* of Appendix 8 North Wilton Precinct Plan of the SEPP.



Design+Planning

Suite 304, 171 Clarence Street
Sydney NSW 2000

PO Box 1778
Sydney NSW 2001

02 9290 3636

