

Our Ref: 15666
Council Ref: PP17/42

16 November 2017

15666

Ms Catherine VanLaeren
Director – Sydney Region East
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Martin Cooper

Dear Martin,

**Rezoning Review Request
73 Vista Street Sans Souci**

On behalf of our client, Nanevski Developments Pty Ltd, we hereby seek a Rezoning Review in relation to a planning proposal lodged with Georges River Council for the site located at 73 Vista Street Sans Souci.

This Rezoning Review request is submitted on the basis that Council has decided not to forward the Planning Proposal to the delegate of the Greater Sydney Commission for a Gateway Determination.

Please find attached to this letter:

- A signed Pre-Gateway Review Application Form;
- A cheque for \$20,000, being the relevant application fee;
- A copy of the Planning Proposal including additional information as provided in response to Council's requests for further information;
- A copy of Council's reports; and
- A copy of all correspondence.

The Rezoning Review process was initiated with the following objectives:

- To provide a mechanism for applicants to have council rezoning decisions reviewed;
- To ensure decisions on planning proposals that are well located, planned, and assist housing and job supply can be independently reviewed; and
- To increase transparency and provide greater certainty in plan making.

This request is consistent with all these objectives, specifically we note that:

- a) The planning proposal has been considered by Council and was refused progression to Gateway despite Council indicating support for some aspects of the proposal. The rezoning review process will therefore provide an appropriate pathway for a recommendation to be made on whether the proposal, in whole or part, has sufficient merit to proceed to Gateway.

- b) The planning proposal documentation submitted to Council and discussed further in this letter, clearly demonstrates that the site has strategic merit particularly with respect to enabling an ageing local population to move to more age-appropriate residential accommodation within their local community.
- c) The decision of Council to refuse the applicants request to delay their decision so that amended plans could be lodged that respond to the recommendations of the Design Review Panel or to consider those amended plans when lodged despite indicating approval for some elements of the planning proposal undermines confidence in the planning system.

In light of the above we respectfully request that the Planning Proposal be forwarded to the Sydney South Planning Panel to carry out a Rezoning Review.

1.0 Planning Proposal

On 9 March 2017 a preliminary planning proposal request was submitted to Georges River Council in relation to the subject site. The planning proposal seeks to amend the Kogarah Local Environmental Plan 2012 for the subject site as follows:

- A rezoning of part of the property from W2 – Recreational Waterways to R2 – Low Density Residential;
- Amending the foreshore building line (FBL) to realign from the new boundary line of the R2 – Low Density Residential zone, at a depth of 7.6m; and
- Amending Schedule 1 to include a provision that allows for additional height and FSR where the development is for the purposes of Seniors Housing that would:
 - Permit a maximum building height of up to RL20.4, up to RL21.6 for any lift overrun and exceeding RL20.4 subject to merit assessment for any structures associated with a rooftop communal open space; and
 - Permit an increase in the permissible floor space ratio up to 2.35:1.

No change to the current R2 Low Density Residential land use zone is proposed. An aerial site photo is provided at **Figure 1**.

The indicative built form scheme submitted with the planning proposal has been modified from that originally submitted to Council based on feedback received from Council officers during the initial assessment phase. Changes to the indicative scheme include a redesign of the scheme to redistribute and reduce the floor space and a reduction in the resultant FSR for the site. Refer to **Table 1** below for a comparison of the current and original proposal.

Table 1 – Proposal options analysis

Option	Height	Floor Space Ratio
Current proposal	RL20.4	1.6:1
Original proposal	RL20.4	2.35:1

The current planning proposal before Council seeks to amend the Kogarah Local Environmental Plan 2012 for the subject site as follows:

- A rezoning of part of the property from W2 – Recreational Waterways to R2 – Low Density Residential;
- Amending the foreshore building line (FBL) to realign from the new boundary line of the R2 – Low Density Residential zone, at a depth of 7.6m; and
- Amending Schedule 1 to include a provision that allows for additional height and FSR where the development is for the purpose of Seniors Housing that would:
 - Permit a maximum building height of up to RL20.4, up to RL21.6 for any lift overrun and exceeding RL20.4 subject to merit assessment for any structures associated with a rooftop communal open space; and

- Permit an increase in the permissible floor space ratio up to 1.6:1.

We note that Council in their letter dated 17 March 2017 previously indicated support for the FBL amendment and rezoning of the land that has historically been filled. The matters of contention therefore are the height and FSR of the indicative scheme.



The Site

Figure 1 – An aerial photo of the site, demonstrating its proximity to the railway station
Source: Nearmap

2.0 Background

The following table provides a summary of the chronology of the planning proposal, covering the period from the first formal discussions with Council through to Council's determination.

Table 2 – Chronology of events

Date	Event
17/11/16	Meeting with GRC (height, fsr, zoning, views to water issues)
9/3/17	Planning Proposal lodged (GRC's report incorrectly states 15/3/17)
20/3/17	GRC Assessment letter dated 17/3/17 (height, fsr, visual impact, value capture issues, schedule 1; rezoning W2 to R2 (excluding wet dock) & moving foreshore building line supported)
3/4/17	JBA response to GRC
10/4/17	Preliminary Environmental Site Investigation lodged
10/5/17	Visual Impact Assessment lodged
26/5/17	LEP Amendment 2 gazetted (rezoned site from E4 to R2 and permits seniors housing in R2 - see below)
17/6/17	GRC email (confirm land, fsr and height)
19/6/17	JBA response to GRC
6/7/17	Design Review Panel (DRP) Meeting
26/7/17	DRP meeting minutes issued dated 27/7/17 (form, scale, density, landscape, amenity, visual impact)
9/8/17	Ethos Urban response to GRC (advise new information being prepared in response to DRP)
12/9/17	GRC email notifying IHAP report on agenda
13/9/17	Ethos Urban request to withdraw from IHAP agenda
13/9/17	GRC decline to withdraw
19/9/17	Request to address IHAP
21/9/17	IHAP meeting
4/10/17	Ethos Urban lodge amended plans & request to withdraw from Environment & Planning Committee
6/10/17	Request to address Environment & Planning Committee
9/10/17	Environment & Planning Committee Meeting
23/10/17	Council Meeting
3/11/17	GRC refusal letter

The planning proposal has not been placed on public exhibition.

3.0 Strategic Merit Assessment and Justification for Review

Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment.

NSW State Plan 2021

The New South Wales State Plan sets the strategic direction and goals for the NSW Government across a broad range of services and infrastructure. The Plan nominates one of the key challenges for the State as being the planning challenges that arise from continued population growth.

The rezoning and future redevelopment of the site is consistent with the State Plan as it will provide jobs and encourage housing diversity in a location that is close to nearby services and facilities.

A Plan for Growing Sydney

Released in December 2014, *A Plan for Growing Sydney* is the NSW Government's strategic metropolitan plan to guide growth across Sydney over the coming decades. The Plan identifies a substantial growth challenge and sets out a series of infrastructure programs and planning directions to facilitate this. Recent amendments to the Environmental Planning and Assessment Act 1979 (NSW) (EP&A Act) introduced a new Part 3B of the Act which

gives A Plan for Growing Sydney statutory effect as the primary strategic planning document for development in Sydney (Section 75A(2)(b)).

Table 3 – Consistency with A Plan for Growing Sydney

Goal 1: Sydney's Competitive Economy	The location of the Seniors Housing is in close proximity to the Hurstville and Kogarah strategic centres. The site is adjacent to the future F6 corridor which will provide increased access between Sydney and Wollongong.
Goal 2: Sydney's housing choices	This Planning Proposal seeks to improve housing choice through the provision of additional Seniors Housing.
Direction 2.1 – Accelerate housing supply across Sydney	The New City Plan was prepared to help Kogarah LGA accelerate housing supply and choice in meeting its dwelling targets and catering for an ageing population.
Direction 2.2 – Accelerate urban renewal across Sydney – providing homes closer to jobs	The proposed housing will renew an existing single dwelling house site and cater for 32 independent living seniors housing apartments accommodating around 40 residents most of whom will no longer be participating in the workforce. It will however allow the turnover of existing housing stock currently occupied by those people. The majority of future residents are expected to be from the local community.
Direction 2.3: Improve housing choice to suite different needs and lifestyles	The Plan for Growing Sydney acknowledges that as the population ages, many people will choose to downsize their homes and that most of these people will prefer to remain in their communities. This Planning Proposal seeks to facilitate this. In particular this proposal has been developed in accordance with Kogarah's Housing Strategy which has sought to facilitate Seniors Housing with a focus on allowing it in foreshore locations.
Goal 3: Sydney's great places to live	Sans Souci is a well-established suburb that has been undergoing a transformation with a number of new developments over the past few years.
Direction 3.1 Revitalise existing suburbs	Research has found that focusing new housing within Sydney's established suburbs brings real benefits to communities. The facilitation of additional Seniors Housing on this site will lower infrastructure costs and ensure ageing residents can 'age in place' in purpose built accommodation and in continue to live in the local community rather than moving further away from their connections.
Goal 4: Sydney's sustainable and resilient environment	The development of this site will have direct connections with the Georges River and the parkland to the south of the site. These assets will be protected in the development and increasingly used by residents.
Direction 4.1: Protect our natural environment and biodiversity	The removal of the W2 Recreational Waterway zoning is not considered to detrimentally impact on the goals of this plan. The waterway boundary is a historical anomaly and has not existed in its mapped form for a number of decades. Any development of this site is unlikely to influence the natural systems along the coast. Maintaining a foreshore building line will ensure that building works will not impact on the natural foreshore processes
Sydney's Subregions	
South Subregion	The Planning Proposal is considered to be consistent with the priorities for the South Subregion including accelerating housing supply and choice in accordance with local strategic plans

A Plan for Growing Sydney is the foundation for achieving region-wide outcomes in relation to the economy and employment; centres and corridors; housing and transport; environment; parks and implementation and governance for Sydney. The goals which support the overarching vision for Sydney to become a strong global city and great place to live are:

- *A competitive economy with world-class services and transport;*
- *A city of housing choice with homes that meet our needs and lifestyles;*
- *A great place to live with communities that are strong, healthy and well connected; and*
- *A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.*

Draft Our Greater Sydney 2056 (A Metropolis of Three Cities – Connecting People)

Released in October 2017, *Our Greater Sydney 2056 (A Metropolis of Three Cities – Connecting People)* includes the Greater Sydney Regional Plan (The Plan) that when adopted will replace *A Plan for Growing Sydney* as the NSW Government's strategic metropolitan plan to guide growth across Sydney over the coming decades.

The Plan includes ten directions, the most relevant to this Planning Proposal being:

- *A city for people;*
- *Housing the city;*
- *A city of great places; and*
- *A well-connected city.*

The Planning Proposal supports the directions in that it provides for development for the purposes of seniors housing that will increase housing diversity in a location that is serviced and close to amenities such as local open space and accessible to transport infrastructure.

NSW Long Term Transport Master Plan 2012

The NSW Long Term Transport Master Plan 2012 has the aim of better integrating land use and transport. A Plan for Growing Sydney has been prepared to integrate with the Long Term Transport Master Plan.

In this way, the potential for Seniors Housing is located nearby to bus stops which provide access to nearby strategic centres and the St George Hospital. Community Transport options are available throughout the St George District, with the master plan having a clear focus to strengthen these services. Additionally, the St George Motor Boat Club offers a courtesy bus to members and guests of the club. The close proximity to bus stops is consistent with this standard in the Seniors Housing SEPP that is within 400 metres and with suitable footpath gradients between the bus stops and the site.

Draft Future Transport Strategy 2056

Future Transport is an update of NSW's Long Term Transport Master Plan. It is a suite of strategies and plans for transport developed in concert with the Greater Sydney Commission's Sydney Region Plan, Infrastructure NSW's State Infrastructure Strategy, and the Department of Planning and Environment's regional plans, to provide an integrated vision for the state.

Of greatest significance to the Planning Proposal are:

- *committed (subject to business case) F6 extension to Kogarah within 10 years*
- *a vision for a new mass transit corridor between Kogarah and Paramatta*

The location is readily accessible and set to become more so in the future.

Draft South District Plan

The revised Draft South District Plan was released by the Greater Sydney Commission in October 2017 and replaced the Draft Plan released in November 2016. In accordance with the provisions of the Environmental Planning and Assessment Act 1979 (NSW) (EP&A Act) this District Plan is given legislative weight and should be used by local governments to inform:

- The preparation of local environmental plans;
- The assessment of Planning Proposals; and
- Strategic land use planning

The Draft South District Plan sets out the priorities and actions required to realise the vision for the area that includes the Canterbury-Bankstown, Georges River and Sutherland Shire local government areas.

The Draft District Plan includes a demographic analysis of the entire district. The South District is said to be growing proportionally slower than the Greater Sydney average. The greatest proportional growth will be in the 85+ age group. Furthermore, the growth in the number of people over 65 will account for almost 43% of the entire District's population growth over the next 20 years to 2036.

The Draft District Plan recognises the need to strengthen the diversity of housing providing opportunities for people to stay in their local area as they get older, plan for health network services and provide convenient access to day to day needs. The location of Seniors Housing in a location adjacent to a community club (the St George Motor Boat Club) as well as being a short distance away from a major hospital (St George) and a number of local and strategic centres means this site is consistent with this direction of the Draft South District Plan.

The South District is well serviced with health infrastructure in the form of the St George Public and Private Hospitals and with future planned investments in Sutherland Hospital as well as private hospitals in Hurstville. These facilities are not only important employment generators; but will also cater for the increasingly ageing population of the district.

Consistent with a relevant local strategy that has been endorsed by the Department;

The former Kogarah City Council has prepared a number of key strategic planning documents that outline a direction to encourage and facilitate Seniors Housing within the LGA. Demographic data illustrates an ageing population and the Kogarah Ageing Strategy has demonstrated that many of this demographic group hope to stay within their area. The New City Plan, the Ageing Strategy and the Housing Strategy all demonstrate the need for additional Seniors Housing in this area.

Kogarah City Council 'New City Plan'

A New Plan for Our City (New City Plan) was a Planning Proposal instigated by the former Kogarah City Council in response to the need to find additional housing opportunities in the local government area, particularly for the ageing population. The Planning Proposal was developed to address many of the shortcomings the Kogarah LEP had since its transferral to the Standard Instrument LEP. The Planning Proposal also sought to implement the recommendations of the following documents:

- Kogarah 2031 Housing Strategy;
- Kogarah Employment Lands and Economic Development Strategy; and the
- Open Space Review.

The Planning Proposal has since been adopted and the changes to the LEP have been gazetted. One of the most relevant aspects of the New City Plan was the inclusion of provisions to facilitate Seniors Housing. This will mainly be facilitated through the removal of the E4 Environmental Living zoning and the introduction of local provisions for Seniors Housing. Seniors Housing has been inserted as a permissible use within the R2 Low Density Residential zoning. The permissible density and height controls are not sufficient to prioritise the delivery of seniors housing over standard residential housing as demonstrated in the lack of approvals for seniors living since its introduction. The current Planning Proposal seeks to address this.

Kogarah Strategic Planning Documents

Kogarah Ageing Strategy

Kogarah City Council developed an 'Ageing Strategy' to suitably cater for their population which was increasingly becoming older proportionally. By 2031 it is estimated that there will be approximately 13,610 people aged over 65 within the former Kogarah City Council area. This encompasses 22% of the total population.

To cater for these individuals, the council has prepared the ageing strategy with a few key objectives including:

- Ensuring older people in the City of Kogarah have a range of high quality and accessible services to meet their needs;

- Support well planned and appropriate development of additional residential aged care facilities to meet projected increased demand;
- Provide park and recreation facilities and infrastructure that meets the needs of our community; and
- Address the limitation of physical land available under appropriate zoning that will allow for further villa, townhouse or over 55's developments.

Whilst the land has been zoned to permit seniors housing the permissible density and height controls are not sufficient to prioritise the delivery of seniors housing over standard residential housing.

Kogarah Housing Strategy 2031

The Kogarah Housing Strategy 2031 has been developed to create a framework in which the former Kogarah Council could meet its housing targets over the 20 year period to 2031. This included the primary concern amongst residents and staff that a range of housing choice was required to suit the different needs of people living in the Kogarah LGA.

This strategy determined that within the Kogarah LGA, approximately half of the households were 1 or 2 person households. This was attributed to a range of factors including the significantly ageing population. Household size is projected to continue to decline over the coming decades and this will require more housing to simply maintain the status quo.

Sans Souci is acknowledged as one of the suburbs with the largest proportions of people aged 65 and over as well as one of the suburbs with the largest proportion of elderly people aged 85 and over. Given the previous acknowledgement within A Plan for Growing Sydney that residents prefer to be able to stay in their local area as they age, it is essential that suitable housing is provided to meet the escalating demand in Sans Souci and the District.

Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognized by existing planning controls.

The most significant changing demographic trend is the ageing of the local population. This has been recognised by the LEP and the Seniors SEPP. There are no significant infrastructure investments relevant to this Planning Proposal.

4.0 Site-Specific Merit Assessment and Justification for Review

The natural environment (including known significant environmental values, resources or hazards)

The Planning Proposal will not result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats. The Georges River will not be impacted by the reduction in land zoned W2 Recreational Waterway given the land reclamation that realigned the foreshore line is a historical relic that has existed for a number of decades.

The continued inclusion of a Foreshore Building Line (in an amended location) will ensure that any future residential development will not impact on natural foreshore processes or affect the significance or amenity of the area.

A Geotechnical Investigation was undertaken by STS GeoEnvironmental. Field testing was undertaken with the drilling of four boreholes across the site. These four boreholes were spaced evenly throughout the site to provide a suitable indication of site conditions.

Subsurface conditions were found to generally consist of fill above clayey sands, sandy clays and weathered sandstone. Importantly, fill was found to be present in all boreholes to depths of 0.5 to 0.8 metres. The discovery of fill on the waterside portion of the site is unsurprising, given the historical high water mark, and the manufactured seawall.

Due to the presence of filling on part of the site a contamination assessment has been commissioned to determine the suitability of the site for more intensive residential development.

A Phase 1 Contamination Report was submitted to Council and considered that the potential for site contamination was low and that the local soils and groundwater were unlikely to pose any significant risk to human health or the environment. In this regard, the site was regarded as being suitable for residential use, in accordance with Clause 7 of State Environmental Planning Policy No. 55 – Remediation of Land.

The site has not been mapped as being located within the flood planning area by the Kogarah LEP 2012. The amendment of the W2 Recreational Waterway land use zone will not impact on the flooding potential of the site, but rather it will align the residential zone with the existing mean high water mark.

The site does not have a history of flooding.

The site is currently considered to be an urban residential site and the future land use will still be in accordance with this use. The rezoning of the W2 Recreational Waterway will not impact on the Georges River as the land shares the characteristics of the rest of the site that is now zoned R2 Low Density Residential.

The existing uses, approved uses and likely future uses of land in the vicinity of the land subject to a proposal

The design of the indicative scheme has taken into account the local context to minimise the impact on neighbouring properties to what is considered an acceptable extent. Setbacks have taken into account the streetscape and have maximised the setback to the north to allow for a view corridor from the dwellings on the eastern side of Vista Street to the water and to allow good solar access to the future dwellings. Landscaping will be included to soften the built form and minimise the visual impact.

The proposed setback from the northern boundary is a minimum of 6 metres to the apartments and 4.75 metres to balconies. Setbacks have been minimised to the south of the site towards Anderson Park to provide a building form that offers passive surveillance of the park and to maximise the northern setback but also allow for landscaping to soften the built form.

The maximum building height has been set at RL 20.4. As the land rises from the Georges River the number of storeys decreases. The building form is also stepped back from the street with only two storeys facing Vista Street, with part of the lower storey situated below street level. In addition, common space has been provided on the terrace levels facing the street to screen the floors behind and reduce the height of the building when viewed from this direction. As a result, the development will appear as a 2 storey building when facing Vista Street. This will ensure the building is developed in a manner that sits comfortably within the existing streetscape and which is significantly lower than the heritage dwelling within the same street view. The streetscape character will be further enhanced by landscaping within the street boundary setback.

A view analysis prepared by Marchese Partners to illustrate the impact of the indicative scheme on the properties to the east, being 66, 68 & 70 Vista Street. An increased setback within the northern setback allows for an improved view corridor. The height of the building will have an impact on the front on views. However, the view above the current building is not considered to be the predominant view corridor through to the water. Views over Anderson Park to the south will be maintained and are consistent with both the existing and compliant schemes.

The indicative scheme prepared by Marchese Partners includes a landscaping concept that seeks to maximise open space, soften the built form and minimise the visual impact on the only adjoining residential property, 71 Vista Street to the north.

A rigorous urban design methodology was applied by Marchese Partners in developing a conceptual scheme that appropriately capitalises on these opportunities. The key elements of the approach were as follows:

Respond to the topography with a building form that capitalises on the low side of the street by presenting as a two storey form to the street consistent with the established height of the heritage dwelling at 6 Vista Street;

Respond to the existing significant detached waterfront housing built form by distinguishing the building into two vertical elements when viewed from the water and across the bay;

Contribute to the landscape amenity and reduce apparent bulk and scale through landscaped terraces, provision for significant replacement tree planting in the front setback and generous landscaped side setbacks;

Provide a genuinely age-appropriate seniors living alternative to detached dwellings within the local area to permit ageing in place;

Permit sufficient scale to enable a range of on-site seniors living services to be provided; and

Deliver quality independent living apartments with water views.

A development concept has been prepared that embodies these urban design principles. An assessment of the concept demonstrates that it has positive social and economic benefits, and will not result in any significant detrimental environmental impacts.

The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.

The site is located in an established urban area and has access to a range of existing facilities and services. The development application for Seniors Housing will require further investigation of the likely provision of services that will be required, in accordance with the provisions of the Seniors Housing SEPP.

The site is well sited in terms of its proximity to bus stops, the St George Motor Boat Club and local health infrastructure.

The site is situated approximately 22km south of the Sydney Central Business District (CBD), 9.7kms south of the Sydney International Airport and 2km north of Taren Point. located within the Georges River (former Kogarah City) Council Local Government Area (LGA).

The opportunity presented by the site to accommodate increased density for seniors housing is evident in that:

- It presents a rare assembly of waterfront parcels to create a significantly larger landholding than is usual in the local area;
- The site is well positioned, being in close proximity to a number of necessary services and facilities. Public transport options are also available to occupants to travel further to shopping centres and the Sydney CBD.
- The closest public bus stops are located on Wellington Street and Nelson Street less than 400m distance from the site. Bus routes using these stops provide relatively frequent, daily services to shopping centres such as Eastgardens as well as connections through to the Sydney CBD
- Kogarah Train Station is located approximately 5kms north of the site which runs services through to Rockdale and Hurstville town centres, and connects to the Sydney CBD and metropolitan train network.
- The site is well positioned, being close to necessary services and facilities:
 - St George Motor Boat Club: 80 metres
 - Nelson Street Bus Stop: 340 metres
 - NSW Marine Rescue: 500 metres
 - Sans Souci Leisure Centre: 600 metres
 - Sans Souci local centre: 1.2km
 - St George Hospital: 4km
 - Kogarah Railway Station: 5km
 - Caringbah Railway Station: 5km
 - Rockdale Plaza: 5.5km

The LEP amendments described in the planning proposal are necessary to ensure that the proposed seniors living development can be delivered via the realisation of the development concept, resulting in a positive outcome for the Sans Souci community.

5.0 Conclusion

As Council has determined the application by refusal to support progression of the matter, it is respectfully requested that the proposal to be considered under the Rezoning Review process.

There are three elements to the Planning Proposal:

1. A rezoning of part of the property from W2 – Recreational Waterways to R2 – Low Density Residential;
2. Amending the foreshore building line (FBL) to realign from the new boundary line of the R2 – Low Density Residential zone, at a depth of 7.6m; and
3. Amending Schedule 1 to include a provision that allows for additional height and FSR where the development is for the purposes of Seniors Housing.

Council has previously confirmed support for the rezoning and amended foreshore building line. We believe that the concerns with the bulk and scale proposed under the Planning Proposal are addressed by the revised concept scheme submitted to Council on 4 October 2017 and that the Planning Proposal is worthy of support.

Notwithstanding, elements 1 and 2 should be supported in the alternate situation that element 3 is not supported.

I trust this information is what you require at this stage to progress this request, however should you have any queries about this matter or require any further information, please do not hesitate to contact me on 9956 6962 or at ncroft@ethosurban.com.

Yours sincerely,



Nathan Croft
Associate Director
0419845089
ncroft@ethosurban.com



James Harrison
Director
9956 6962
jharrison@ethosurban.com