

DEVELOPMENT APPLICATION ASSESSMENT REPORT

Application Number:	DA2021/1535
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Responsible Officer:	Catriona Shirley
Land to be developed (Address):	Lot 10 DP 1207797, 46 - 48 East Esplanade MANLY NSW 2095
Proposed Development:	Use of premises as an office
Zoning:	Manly LEP2013 - Land zoned B2 Local Centre
Development Permissible:	Yes
Existing Use Rights:	No
Consent Authority:	Northern Beaches Council
Land and Environment Court Action:	No
Owner:	Aspiring Properties Pty Ltd
Applicant:	Aspiring Properties Pty Ltd

Application Lodged:	31/08/2021
Integrated Development:	No
Designated Development:	No
State Reporting Category:	Commercial/Retail/Office
Notified:	10/09/2021 to 24/09/2021
Advertised:	Not Advertised
Submissions Received:	0
Clause 4.6 Variation:	Nil
Recommendation:	Approval

Estimated Cost of Works:	\$ 0.00
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PROPOSED DEVELOPMENT IN DETAIL

This proposal seeks approval for the change of use from an educational establishment use to commercial office space for Levels One and Two of the commercial building.

The proposal does not provide for any physical works or building alteration, with no change to the approved floor space ratio (FSR).

Hours of operation are proposed to be as follows:

- Monday to Sunday: 7am to 7pm

There is no signage as part of the application.

Note: Development Application **DA2019/0997** for the demolition works, construction of a commercial building and lot consolidation across No. 6 The Corso and Nos. 50 and 46-48 East Esplanade was approved on the 18 March 2020, with building works not yet commenced. As part of this application only minor internal alterations for No. 46-48 East Esplanade were approved. As a result, the tenancy areas that form a part of this development application will not be affected when the approved consent is commenced.

ASSESSMENT INTRODUCTION

The application has been assessed in accordance with the requirements of the Environmental Planning and Assessment Act 1979 and the associated Regulations. In this regard:

- An assessment report and recommendation has been prepared (the subject of this report) taking into account all relevant provisions of the Environmental Planning and Assessment Act 1979, and the associated regulations;
- A site inspection was conducted and consideration has been given to the impacts of the development upon the subject site and adjoining, surrounding and nearby properties;
- Notification to adjoining and surrounding properties, advertisement (where required) and referral to relevant internal and external bodies in accordance with the Act, Regulations and relevant Development Control Plan;
- A review and consideration of all submissions made by the public and community interest groups in relation to the application;
- A review and consideration of all documentation provided with the application (up to the time of determination);
- A review and consideration of all referral comments provided by the relevant Council Officers, State Government Authorities/Agencies and Federal Government Authorities/Agencies on the proposal.

SUMMARY OF ASSESSMENT ISSUES

Manly Local Environmental Plan 2013 - 5.10 Heritage conservation

Manly Local Environmental Plan 2013 - 6.11 Active street frontages

Manly Local Environmental Plan 2013 - 6.16 Gross floor area in Zone B2

Manly Development Control Plan - 3.4 Amenity (Views, Overshadowing, Overlooking /Privacy, Noise)

Manly Development Control Plan - 4.2 Development in Business Centres (LEP Zones B1

Neighbourhood Centres and B2 Local Centres)

Manly Development Control Plan - 4.2.4 Car parking, Vehicular Access and Loading Controls for all LEP Business Zones including B6 Enterprise Corridor

SITE DESCRIPTION

Property Description:	Lot 10 DP 1207797 , 46 - 48 East Esplanade MANLY NSW 2095
Detailed Site Description:	The subject site consists of one (1) allotment located on the northern-eastern side of East Esplanade. The site is irregular in shape with a frontage of 20.6m along East Esplanade and an average depth of 35.1m. The site has an area of 696.9m².

The site is located within the B2 Local Centre and accommodates a two storey mixed use Victorian terrace style building on the east esplanade frontage and a five storey mixed use building to the rear of the site.

Adjoining and surrounding development is characterised by commercial premises and shop top housing.

Map:



SITE HISTORY

A search of Council's records has revealed the following relevant development applications:

- Development Application **DA2019/0097** for the demolition works and construction of a commercial building and lot consolidation was approved by the Northern Beaches Local Planning Panel on the 18/3/2020.
- Modification Application **Mod2019/0462** for the Modification of Development Consent DA238/2014 granted for a part change of use to Educational Establishment associated fitout and signage was approved on the 20/12/2019.
- Modification Application **Mod2019/0073** for the Modification of Development Consent DA153/2016 granted for change of use from an existing office space to classrooms student lounge and staff area to accommodate an additional seventy six (76) students at ICMS was approved on the 27/06/2019.
- Development Application **10.2017.116.1** for new signage to the existing buildings was approved on the 15/09/2017.
- Development Application **10.2016.153.1** for the change of use from an existing office space to classrooms, student lounge and staff area to accommodate an additional seventy-six (76) students - International College of Management Students was approved on the 17/08/2016.
- Development Application **10.2014.238.1** for change of use to Educational Establishment, associated fitout and signage was approved on the 02/02/2015.
- Development Application **10.2014.41.1** for the alterations and additions to existing building including a new security gate and amendment to change approved store room into a shower room was approved 07/05/2014.

- Development Application **10.2012.5.1** for the establishment of use as a Commercial Premises was approved on the 07/03/2012.
- Pre-lodgement Meeting **PLM2019/0077 & PLM2019/0158** was held on 08/08/2019 for the demolition works and construction of a new building, including site amalgamation.

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT, 1979 (EPAA)

The relevant matters for consideration under the Environmental Planning and Assessment Act, 1979, are:

Section 4.15 Matters for Consideration'	Comments
Section 4.15 (1) (a)(i) – Provisions of any environmental planning instrument	See discussion on "Environmental Planning Instruments" in this report.
Section 4.15 (1) (a)(ii) – Provisions of any draft environmental planning instrument	Draft State Environmental Planning Policy (Remediation of Land) seeks to replace the existing SEPP No. 55 (Remediation of Land). Public consultation on the draft policy was completed on 13 April 2018. The subject site has been used for residential purposes for an extended period of time. The proposed development retains the residential use of the site, and is not considered a contamination risk.
Section 4.15 (1) (a)(iii) – Provisions of any development control plan	Mainly Development Control Plan applies to this proposal.
Section 4.15 (1) (a)(iia) – Provisions of any planning agreement	None applicable.
Section 4.15 (1) (a)(iv) – Provisions of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation 2000)	<u>Division 8A</u> of the EP&A Regulation 2000 requires the consent authority to consider "Prescribed conditions" of development consent. These matters have been addressed via a condition of consent. <u>Clauses 54 and 109</u> of the EP&A Regulation 2000 allow Council to request additional information. No additional information was requested in this case. <u>Clause 92</u> of the EP&A Regulation 2000 requires the consent authority to consider AS 2601 - 1991: The Demolition of Structures. This matter has been addressed via a condition of consent. <u>Clauses 93 and/or 94</u> of the EP&A Regulation 2000 requires the consent authority to consider the upgrading of a building (including fire safety upgrade of development). This matter has been addressed via a condition of consent. <u>Clause 98</u> of the EP&A Regulation 2000 requires the consent authority to consider the provisions of the Building Code of Australia (BCA). This matter has been addressed via a condition

Section 4.15 Matters for Consideration'	Comments
	of consent.
Section 4.15 (1) (b) – the likely impacts of the development, including environmental impacts on the natural and built environment and social and economic impacts in the locality	(i) Environmental Impact The environmental impacts of the proposed development on the natural and built environment are addressed under the Manly Development Control Plan section in this report. (ii) Social Impact The proposed development will not have a detrimental social impact in the locality considering the character of the proposal. (iii) Economic Impact The proposed development will not have a detrimental economic impact on the locality considering the nature of the existing and proposed land use.
Section 4.15 (1) (c) – the suitability of the site for the development	The site is considered suitable for the proposed development.
Section 4.15 (1) (d) – any submissions made in accordance with the EPA Act or EPA Regs	See discussion on “Notification & Submissions Received” in this report.
Section 4.15 (1) (e) – the public interest	No matters have arisen in this assessment that would justify the refusal of the application in the public interest.

EXISTING USE RIGHTS

Existing Use Rights are not applicable to this application.

BUSHFIRE PRONE LAND

The site is not classified as bush fire prone land.

NOTIFICATION & SUBMISSIONS RECEIVED

The subject development application has been publicly exhibited from 10/09/2021 to 24/09/2021 in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and the Community Participation Plan.

As a result of the public exhibition of the application Council received no submissions.

REFERRALS

Internal Referral Body	Comments
Building Assessment - Fire and Disability upgrades	The application has been investigated with respects to aspects relevant to the Building Certification and Fire Safety Department. There are no objections to approval of the development subject to inclusion of the attached conditions of approval and consideration of the notes below. Note: The proposed development may not comply with some requirements of the BCA and the Premises Standards. Issues such as

Internal Referral Body	Comments
	this however may be determined at Construction Certificate Stage.
Strategic and Place Planning (Heritage Officer)	HERITAGE COMMENTS
	Discussion of reason for referral
	The proposal has been referred to Heritage as the subject property is a heritage item, being Item I151 - Terrace building - 46, 47 and 48 East Esplanade. It is also located in C2 - Manly Town Centre Conservation Area and within the vicinity of a number of heritage items, listed in Schedule 5 of Manly LEP 2013: Item I106 - Group of commercial buildings - All numbers The Corso Item I145- Manly Wharf - East and West Esplanades (opposite The Corso, Harbour side) Item I150 - Two terrace houses - 41–42 East Esplanade Item I152- Commercial and residential building - 50 East Esplanade Item I153- Commercial and residential building -53 East Esplanade
	Details of heritage items affected
	Details of the heritage items as contained within the Northern Beaches Heritage inventory are: Item I151 - Terrace building <u>Statement of significance:</u> The building at 46-48 East Esplanade Manly is of local cultural heritage significance for its ability to demonstrate the pattern of Manly's development. The Esplanade was a major element of H G Smith's concept for his township and the gateway to Manly. It is a representative, moderately intact, example of Victorian Boom style architecture but most importantly it is a remnant of late Nineteenth Century development of the Esplanade, of which few examples remain. Despite later alterations and additions the building contributes substantially to the historic streetscape of the Esplanade and is an important element in the historic and landscape context of the Pier and The Corso overall. <u>Physical description:</u> The building is a parapeted two story row of three terraces constructed in the late Victorian Boom style of architecture. Although the façade of the Northern terrace has been altered and the front of the central terrace at the lower level infilled, the majority of the original form is intact. The parapet is highly decorated with rendered mouldings and the name "Ilchester" visible on the upper

Internal Referral Body	Comments	
	parapet. Parapeted balconies extend in front of the main façade on the Southern and Central terraces. The balcony to the north has been obscured. The parapets have curved tops reflecting the early bullnosed form of the awnings which are currently sloped, ribbed metal. The balconies are currently enclosed with half glassed infill. Floor plans of the existing building indicate that the original form has been retained. C2 - Manly Town Centre Conservation Area <u>Statement of significance:</u> The Manly Town Centre Conservation Area (TCCA) is of local heritage significance as a reflection of the early development of Manly as a peripheral harbor and beachside village in the fledgling colony of New South Wales. This significance is enhanced by its role as a day-trip and holiday destination during those early years, continuing up to the present time, and its association with H G Smith, the original designer and developer of the TCCA as it is today. The physical elements of the TCCA reflect this early development and its continued use for recreational purposes, most notably the intact promenade quality of The Corso and its turn of the century streetscape, as well as key built elements such as hotels, and remaining original commercial and small scale residential buildings. Item I152- Commercial and residential building <u>Statement of significance:</u> One of the earliest allotments to be sold on the south of the The Corso, originally designated as Victoria Park in HG Smith's plan for Brighton. The building is a remnant example of early 20th century development along the East Esplanade and a good and relatively intact example of a Federation Arts and Crafts style commercial/residential building, constructed close to the ferry wharf and the newly arrived tram service. The building is an important element in the streetscape wand contributes to the overall significance of the Town Centre Conservation Area. <u>Physical description:</u> Two storey parapeted ship with upper level residences. Generally of Federation Arts and Crafts style featuring roughcast render contrasting with face brickwork (now painted). Terracotta tiled awning with eaves brackets extending over twin oriels with double hung windows and pressed metal siding. Possible later façade to traditional Victorian period terraced building. Southern boundary wall scored render. Shopfront and awning altered.	
	Other relevant heritage listings	
	Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005	No
	Australian Heritage Register	No

Internal Referral Body	Comments
	NSW State Heritage Register
	No
	National Trust of Aust (NSW) Register
	No
	RAIA Register of 20th Century Buildings of Significance
	No
	Other
	No
	Consideration of Application
	The proposal seeks consent for the change of use of Levels 1 and 2 of the approved development. It is proposed to change the approved educational use to commercial office space. The proposed works do not involve any physical works or building alterations, as such the proposal is considered to not impact upon the significance of the heritage items or the conservation area. Therefore, no objections are raised to the proposal on heritage grounds and no conditions required. <u>Consider against the provisions of CL5.10 of Manly LEP 2013.</u> Is a Conservation Management Plan (CMP) Required? No Has a CMP been provided? No Is a Heritage Impact Statement required? Yes Has a Heritage Impact Statement been provided? Yes
	Further Comments
	COMPLETED BY: Oya Guner, Heritage Advisor DATE: 02 Sep 2021

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)*

All, Environmental Planning Instruments (SEPPs, REPs and LEPs), Development Controls Plans and Council Policies have been considered in the merit assessment of this application.

In this regard, whilst all provisions of each Environmental Planning Instruments (SEPPs, REPs and LEPs), Development Controls Plans and Council Policies have been considered in the assessment, many provisions contained within the document are not relevant or are enacting, definitions and operational provisions which the proposal is considered to be acceptable against.

As such, an assessment is provided against the controls relevant to the merit consideration of the application hereunder.

State Environmental Planning Policies (SEPPs) and State Regional Environmental Plans (SREPs)

SEPP 55 - Remediation of Land

Clause 7 (1) (a) of SEPP 55 requires the Consent Authority to consider whether land is contaminated. Council records indicate that the subject site has been used for residential and commercial purposes for a significant period of time with no prior land uses.

The proposal is for a change of use with no works occurring at ground level which would otherwise disturb the existing ground levels or building foundations.

In this regard it is considered that the site poses no risk of contamination and therefore, no further consideration is required under Clause 7 (1) (b) and (c) of SEPP 55 and the land is considered to be suitable for the mixed land use.

Manly Local Environmental Plan 2013

Is the development permissible?	Yes
After consideration of the merits of the proposal, is the development consistent with:	
aims of the LEP?	Yes
zone objectives of the LEP?	Yes

Principal Development Standards

There is no change proposed to the Principal Development Standards as part of the proposal.

Compliance Assessment

Clause	Compliance with Requirements
5.10 Heritage conservation	Yes
6.11 Active street frontages	Yes
6.16 Gross floor area in Zone B2	Yes

Detailed Assessment

5.10 Heritage conservation

Property No. 46 – 48 East Esplanade is identified as a local heritage item pursuant to Schedule 5 of Manly LEP 2013 and located within the C2 Town Centre Heritage Conservation Area. Further, the properties immediately to the north and known as No. 50 East Esplanade and No. 6 The Corso are identified as contributory items within the Town Centre Heritage Conservation Area.

The change of use from an educational establishment to an office space will have no impact on significant building fabric and to that extent will have a neutral impact on the significance of the item and its setting, adjacent contributory items and the conservation area generally.

Council can be satisfied that the proposal will provide for the conservation of the environmental heritage of Manly.

6.11 Active street frontages

Pursuant to clause 6.11, the site is identified on the Active Street Frontages Map with the proposal change of use maintaining the existing and an appropriate level of street activation in this location.

6.16 Gross floor area in Zone B2

Pursuant to clause 6.16 development consent must not be granted to the erection of a building on land in Zone B2 Local Centre unless the consent authority is satisfied that at least 25% of the gross floor area of the building will be used as commercial premises.

The objective of this clause is to provide for the viability of Zone B2 Local Centre and encourage the development, expansion and diversity of business activities that will contribute to economic growth, retention of local services and employment opportunities in local centres.

The proposed change of use maintains the developments compliance with this standard.

Manly Development Control Plan

Built Form Controls

There is no change proposed to the Built Form Controls as part of the proposal.

Compliance Assessment

Clause	Compliance with Requirements	Consistency Aims/Objectives
3.1 Streetscapes and Townscapes	Yes	Yes
3.1.3 Townscape (Local and Neighbourhood Centres)	Yes	Yes
3.2 Heritage Considerations	Yes	Yes
3.4 Amenity (Views, Overshadowing, Overlooking /Privacy, Noise)	Yes	Yes
3.6 Accessibility	Yes	Yes
3.8 Waste Management	Yes	Yes
3.10 Safety and Security	Yes	Yes
4.2 Development in Business Centres (LEP Zones B1 Neighbourhood Centres and B2 Local Centres)	Yes	Yes
4.2.4 Car parking, Vehicular Access and Loading Controls for all LEP Business Zones including B6 Enterprise Corridor	Yes	Yes
4.2.5 Manly Town Centre and Surrounds	Yes	Yes
4.2.5.4 Car Parking and Access	Yes	Yes
5 Special Character Areas and Sites	Yes	Yes
5.1.1 General Character	Yes	Yes
5.1.2 The Corso	Yes	Yes

Detailed Assessment

3.4 Amenity (Views, Overshadowing, Overlooking /Privacy, Noise)

The proposed change of use from an education establishment to a office space will be undertaken wholly within the existing building form and to that extent will not give rise to any adverse overshadowing, view, noise or privacy affectation. The office space will operate Monday to Sunday from 7.00am - 7.00pm, consistent with other tenancies operating hours. The proposed operating hours are not considered to give rise to any adverse amenity impacts to nearby residential dwellings.

4.2 Development in Business Centres (LEP Zones B1 Neighbourhood Centres and B2 Local Centres)

The application is for a change of use only. No works are proposed as part of this application. As a result there will not be any works internal or external that will give rise to any inappropriate or jarring streetscape, urban design or residential amenity outcomes.

4.2.4 Car parking, Vehicular Access and Loading Controls for all LEP Business Zones including B6 Enterprise Corridor

Description of non-compliance:

Schedule 3 of the Manly DCP requires:

Commercial Premises (including business, offices and retail premises) not elsewhere referred to in this Schedule*:

- 1 parking space for every 40sqm of gross floor area.

Note: Where Commercial Premises that are subject to this rate are located in Manly Town Centre, paragraph 4.2.5.4 Car Parking and Access also applies which includes exceptions to the parking rates/requirements for properties located within the Manly Town Centre, which includes the Corso.

The proposal does not provide any off-street car parking.

The office use will operate between 7:00am and 7:00pm Monday to Sunday.

Merit Assessment:

The objectives of this control are as follows:

Objective 1) To ensure there is adequate provisions for car parking access and loading in future development and redevelopment in all business zones.

Objective 2) To minimise conflicts between pedestrian and vehicular movement systems within the business areas.

Comment:

The proposal does not provide any on-site car parking. However, the proposal is only for a change of use from a Educational Establishment to an office premises.

It is impractical for the site to provide any off-street parking and it is considered that the proposed uses will generate less demand for car parking than the previous approval for an Educational Establishment.

Manly, and this location in particular, is also well served by public transport and the limited availability, and the timed nature, of on-street parking is well known and well controlled.

In this regard, the change of use to an office space, with no additional car parking is considered acceptable in these circumstances.

THREATENED SPECIES, POPULATIONS OR ECOLOGICAL COMMUNITIES

The proposal will not significantly affect threatened species, populations or ecological communities, or their habitats.

CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN

The proposal is consistent with the principles of Crime Prevention Through Environmental Design.

POLICY CONTROLS

Northern Beaches Section 7.12 Contributions Plan 2021

As the estimated cost of works is less than \$100,001.00 the policy is not applicable to the assessment of this application.

CONCLUSION

The site has been inspected and the application assessed having regard to all documentation submitted by the applicant and the provisions of:

- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- All relevant and draft Environmental Planning Instruments;
- Manly Local Environment Plan;
- Manly Development Control Plan; and
- Codes and Policies of Council.

This assessment has taken into consideration the submitted plans, Statement of Environmental Effects, all other documentation supporting the application and public submissions, and does not result in any unreasonable impacts on surrounding, adjoining, adjacent and nearby properties subject to the conditions contained within the recommendation.

In consideration of the proposal and the merit consideration of the development, the proposal is considered to be:

- Consistent with the objectives of the DCP
- Consistent with the zone objectives of the LEP
- Consistent with the aims of the LEP
- Consistent with the objectives of the relevant EPIs
- Consistent with the objects of the Environmental Planning and Assessment Act 1979

It is considered that the proposed development satisfies the appropriate controls and that all processes and assessments have been satisfactorily addressed.

RECOMMENDATION

THAT Council as the consent authority grant Development Consent to DA2021/1535 for Use of premises as an office on land at Lot 10 DP 1207797, 46 - 48 East Esplanade, MANLY, subject to the conditions printed below:

DEVELOPMENT CONSENT OPERATIONAL CONDITIONS

1. Approved Plans and Supporting Documentation

The development must be carried out in compliance (except as amended by any other condition of consent) with the following:

a) Approved Plans

Architectural Plans - Endorsed with Council's stamp		
Drawing No.	Dated	Prepared By
First Floor Plan	23/8/2021	Wolski Coppin Architecture
Second Floor Plan	23/8/2021	Wolski Coppin Architecture

b) Any plans and / or documentation submitted to satisfy the Conditions of this consent.

In the event of any inconsistency between conditions of this consent and the drawings/documents referred to above, the conditions of this consent will prevail.

Reason: To ensure the work is carried out in accordance with the determination of Council and approved plans.

2. **Approved Land Use**

Nothing in this consent shall authorise the use of the tenancies as detailed on the approved plans for any land use of the site beyond the definition of an Office Premises.

A Office Premises is defined as:

"office premises means a building or place used for the purpose of administrative, clerical, technical, professional or similar activities that do not include dealing with members of the public at the building or place on a direct and regular basis, except where such dealing is a minor activity (by appointment) that is ancillary to the main purpose for which the building or place is used.

Note—

Office premises are a type of commercial premises—see the definition of that term in this Dictionary."

(development is defined by the Manly Local Environment Plan 2013 (as amended) Dictionary)

Any variation to the approved land use and/occupancy of any unit beyond the scope of the above definition will require the submission to Council of a new development application.

Reason: To ensure compliance with the terms of this consent.

CONDITIONS WHICH MUST BE COMPLIED WITH PRIOR TO THE ISSUE OF THE OCCUPATION CERTIFICATE

3. **Fire Safety Matters**

At the completion of all works, a Fire Safety Certificate will need to be prepared which references all the Essential Fire Safety Measures applicable and the relative standards of Performance (as per Schedule of Fire Safety Measures). This certificate must be prominently displayed in the building and copies must be sent to Council and the NSW Fire Brigade.

Details demonstrating compliance are to be submitted to the Certifying Authority prior to the issue of the Interim / Final Occupation Certificate.

Each year the Owners must send to the Council and the NSW Fire Brigade an annual Fire Safety Statement which confirms that all the Essential Fire Safety Measures continue to perform

to the original design standard.

Reason: Statutory requirement under Part 9 Division 4 & 5 of the Environmental Planning and Assessment Regulation 2000.

ON-GOING CONDITIONS THAT MUST BE COMPLIED WITH AT ALL TIMES

4. **Commercial Waste Management**

Waste and recyclable material, generated by this premises, must not be collected between the hours of 7pm and 7am on any day.

Reason: To protect the acoustic amenity of surrounding properties.

5. **Delivery Times**

No deliveries, loading or unloading associated with the premises are to take place between the hours of 6pm and 6am on any day.

Reason: To protect ensure the acoustic amenity of surrounding properties.

6. **Hours of Operation**

The hours of operation are to be restricted to:

- Monday to Sunday – 7:00am - 7:00pm

Upon expiration of the permitted hours, all service (and entertainment) shall immediately cease, no patrons shall be permitted entry and all customers on the premises shall be required to leave within the following 30 minutes.

Reason: Information to ensure that amenity of the surrounding locality is maintained.

In signing this report, I declare that I do not have a Conflict of Interest.

Signed



Catriona Shirley, Planner

The application is determined on 02/11/2021, under the delegated authority of:



Rodney Piggott, Manager Development Assessments