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OBJECTION TO AMENDMENTS TO DA202240431 - S144C (PROPOSAL FOR SUPPORTIVE HOUSING DEVELOPMENT AND LEASE VARIATION).

1. The Griffith Narrabundah Community Association (GNCA) welcomes the opportunity to comment on this matter. The GNCA was founded in 2000 and has wide support amongst our area's 3,000 or so households.

The Blocks in question

2. 5-7 Roe St Griffith - RZ1 - 1,647m² total, (823m² for Block 22, Section 48 + 824m² for Block 21, Section 48).

History of the DA

3. The original DA was lodged on 21 July 2022, and sought approval for *Demolition of two existing houses, construction of new supportive housing comprising four single storey dwellings on a consolidated/amalgamated block, all adaptable class C, with associated driveways, paths, parking and landscape works. Consolidation of Blocks 21 and 22, including adding supportive housing on crown lease.* This was approved by ACTPLA on 30 August 2022, but subject to a number (not enumerated by ACTPLA but we count 10) of conditions (discussed at the end of this submission).
4. The approval decision was taken to ACAT by local residents of Roe St, where the DA was found to display a number of flaws to the extent that the ACAT could not support ACTPLA's approval. Consequently, on 1 February 2023 the ACAT set aside ACTPLA's approval and remitted the application back to ACTPLA for further consideration. This meant that the proponent was permitted to revise the flawed DA with an s144 amendment and resubmit it to ACTPLA for further consideration. The proponent has now done this with the current Development Application - DA202240431 - S144C, renotified on 13 June 2023.

The DA Papers

5. The current DA papers (31 digital files) do not include all the documents needed when applying for a DA and so we assume that where these are missing from this application but were included in the original application (a total of 52 digital files) then those documents still stand. We assume that any document with the same name as a document in the original application replaces that original document (for instance, the Access Report by Eric Martin and Associates of 21 April 2023 replaces the Access Report by Eric Martin and Associates of 27 June 2022).
6. As seems to be general practice now, some important files have been withheld – those that give details of the internal arrangements and the layout and dimension of the garages. This makes it impossible for a lay person to determine whether the applicant's claims that the DA now complies with the Access and Mobility Codes are valid. This would not matter if ACTPLA performed its legislated role and actually examined DAs for compliance but, as several recent ACAT determinations have amply demonstrated this, sadly, is no longer the case.
7. Lists of files comprising the DA are given in the architect's drawings Cover Sheet (Cover Sheet drawing A121), the engineer's list of drawings prepared for the DA, given in Table 1 on p.5 of the Engineer's Civil Statement Against Relevant Criteria, and the Landscape Planner's 'Cover Sheet' revision C drawing 101. We have been unable to fully reconcile these lists with the files that have been placed on EPSDD's website in notification of the new DA.

Desired Outcomes

8. **It is the GNCA's view that the DA should be rejected, both on planning grounds and on wider social and local character considerations. In particular the DA does not comply with the Lease Variation General Code; the Residential Zones Development Code, and in particular the requirements of that Code to meet the requirements of Australian Standard 4299 and the Access and Mobility Code; Rules/Criteria 40, 57, 61, 72, 74, 77, 82, and 83 of the Multi-Unit Housing Development Code; and Rules/Criteria 1 and 3 of the Water Sensitive Urban Design Code. In addition, not all the changes introduced to achieve compliance, actually achieve their desired objective. One outcome of the proposed development is 70% public housing in a small street. These issues are discussed more fully below – see Part B below.**
9. However, if ACTPLA approves the DA, then Residential Use lease purpose clause should be removed. Failing this, the GNCA asks that Supportive Housing not be added, so that only Residential Use is permitted. The GNCA notes that this would preclude consolidation of the two blocks.

PART A

Comments on Rules Lease Variation General Code (LVGC)

10. The DA proposes that the lease be varied to consolidate blocks 21 and 22 and to vary the lease to add supportive housing as a permissible use. Consequently, despite the proponent's assertion to the contrary in the Statement Against Criteria, the Code applies.
11. Varying the lease to permit Supportive Housing would be increasing the rights under the lease, and consequently Criterion 2 of the LVGC applies. In addition, if Supportive Housing is inserted as an added use in addition to residential use, then an additional use would have been granted and Criterion 3 of the LVGC would apply. In the absence of any evidence from the proponent that the DA is compliant we must assume that it does not comply.

Residential Zones Development Code, Australian Standard 4299 Adaptable Housing Standard and the Access and Mobility General Code, (RZDC, AS4299, and AMGC respectively)

12. **Criterion 3** of the RZDC requires that Supportive Housing amongst other things achieves 'consistency with the *desired character*' and 'compatibility with exterior building materials of existing buildings in the locality'. The architect's Statement Against Criteria asserts that the DA complies with the desired character without giving any details of what this character is perceived to be or how the development conforms with it. The need for compatible building materials is simply ignored. The DA does not comply with this criterion.
13. **Rule 4** of the RZDC requires that Supportive Housing complies with the Australian Standard *AS4299 Adaptable housing* (Class C) and the Access and Mobility General Code. ACTPLA clearly had some concerns about the DA's compliance with these rules at the time of approval because it imposed four (4) conditions on the approval to ensure that compliance was more evident (paragraphs 102 to 105 dealing with conditions C7 to C10) and consequently one might have thought that the proponent would devote particular attention to these issues.
14. The proponent asserts compliance in the architect's Statement Against Criteria but does not give supportive details. In the s144 Statement the proponent notes that the Tribunal was critical of the sub-standard sizes of the two car garages (in Units 3 and 4) and the lack of appropriate circulation within all units. The s144 Statement says these issues have been resolved and compliance with AS4299 and the Access and Mobility Code is assured.
15. As we have no access to any internal plans it is impossible to determine whether these claims in relation to the garages and internal circulation are valid. Eric Martin & Associates have prepared a revised Access Report dated 21 April 2023 which asserts that

“The design meets the requirements of AS4299 Adaptable House Class C” and ‘The proposed design will be accessible to the requirements of NCC 2019 Amendment 1 Vol 1 BCA and the AMG’C”. However, it should be noted that the original Access Report, dated 27 June 2022 made similar statements. Despite this report it seems that the ACAT had some doubts about the DA’s compliance.

16. In regard to the requirement that there be a continuous accessible path for those who use wheelchairs, the GNCA is not convinced that such access to the Utility area of Unit 4 is consistent with the standard. See our comments under paragraph 25 below.
17. A further point to note is that the revised Access Report of 21 April 2023 asserts on p.1 that “There are no visitor parking spaces.” However, inspection of drawing A005 ‘Parking and Driveway Plan”, revision P8, dated 12 May 2023 clearly shows a parking space labelled ‘Visitor Parking’ in the gap between Unit 3 and Unit 4. Drawing A005 is specifically listed in the revised Access Report (at p.1), but as revision P2. As the revised Access Report is dated 21 April, some 21 days before the Revision P8 version of the Parking and Driveway Plan, it is possible that the proposed parking arrangements were significantly changed in the interim. However, the same space was designated ‘Visitor’ in the original Parking and Driveway Plan of 8 June 2022, which presumably was examined in the preparation of the original Access Report, and which correctly states that there were to be two visitor parking spaces.
18. Architects and engineers amending drawings and other documents and then tendering them with an Access Report prepared before the latest batch of plans is a problem that ACAT has seen before. The usual response has been to order a new, up-to-date, Access Report before considering the matter further. One might ponder on the role of the project officer within ACT Housing with responsibility for the project, who could be expected to check to ensure that all documents were in order and that the Access certifier had seen the latest version of all plans.
19. Whatever the explanation, the fact that the Access certifier had so misread the plans as to believe that there was no proposed visitor parking is a matter of concern and throws doubt on the quality and reliability of the Access Report.
20. One of the things that the Tribunal has insisted on in earlier cases is that the plans provide details of how the proposed dwellings will comply with all the requirements of AS4299, rather than just asserting that compliance will be undertaken when this becomes necessary. In this regard we note that the revised Access Report, under ‘4.0 ADAPTABLE HOUSING’ (p.3), lists 28 items where details of compliance have not yet been provided. This has not been acceptable to ACAT in the past and would also seem to be in breach of ACTPLA’s own Condition 9 (see paragraph 104 below).
21. Similarly, ACTPLA’s Condition 7 required that all external lighting comply with the appropriate standards. We deduce from this that the external lighting detailed in Plan E002 ‘Electrical Services Site Plan’ were deemed inadequate by ACTPLA. A

supposedly revised version of this plan (E002) has been included with the amended DA papers marked revision 3, but as the changes have not been highlighted, we have been unable to identify any changes.

22. In previous cases relating to the provision of Supportive Housing the ACAT has also insisted on the provision of internal lighting, power and fit out plans with the DA to demonstrate compliance. For instance for a recent ACAT hearing a proponent provided an Access & Mobility Plan to demonstrate how all doorways and corridors complied with the requirements and that a wheelchair could navigate in all of the rooms; a reflected ceiling plan to show the layout of the internal lighting; and separate detailed plans and wall elevations for each dwelling to demonstrate compliance with all the essential features listed in Appendix A of the Australian Standard Accessible Housing AS4299, especially in relation to kitchens, laundries, bathrooms and toilets. Similar plans should be provided in this case as well.
23. With the currently inadequate documentation there is no way anyone can be certain that the DA now complies or could be made to comply with the required standards.

MUHDC

Criterion 40 – Landscape Design

24. Criterion 40 requires amongst other things that “Landscape and site design achieves all of the following: ... d) reasonable residential amenity”
25. Part of the fence separating the Utility Areas of Unit 3 and Unit 4 has been dog-legged to the north to ensure that there is an appropriate width of 1.05m for a user in a wheelchair in passing between the rainwater tank for Unit 4 and the fence. Past the rainwater tank, the fence reverts to its originally designed location on the midline of the area between Units 3 and 4. The minimum distance between the fence and the rainwater tank as it doglegs to the south is also 1.05m. It is not clear to the GNCA whether this dogleg is regarded as a curve, and whether the gap between the tank and the angled fence is compliant with the requirements of AS 1428, which sets out the requirements for a continuous accessible path. We note that in the courtyards of Unit 1 and Unit 2 the proponent has made sure there is a 1.5m clearance provided between the rainwater tanks of each of the Units and their clothes lines to allow access. This change formed part of amendment 4 of the changes made to the original DA.
26. The GNCA is not convinced that this Criterion, nor all the requirements under Rule 4 of the RZDC, have been met.

Rule 57 – Solar Access – Other than Apartments

27. The comments in the s144 Statement at p.6 suggest that the architect believes that the DA must comply with Rule 57A, which applies to developments “on *blocks* approved under an *estate development plan* on or after 5 July 2013”. This is the wrong rule. This

DA must comply with Rule 57, which requires that ‘The floor or internal wall of a daytime living area of a dwelling is exposed to not less than 3 hours of direct sunlight between the hours of 9am and 3pm on the winter solstice (21 June)’. This is usually demonstrated by inclusion of a sunshine diagram demonstrating the internal sunlit areas for appropriate hours on June 21. No such diagram has been included with this DA so compliance with this rule has not been demonstrated.

Rule 61 - Principal Private Open Space

28. Two bedroom dwellings in multi-unit developments are required to provide each dwelling with Principal Private Open Space (PPOS) of at least 36m² in area and a minimum dimension of 6m.
29. Although it cannot be determined from the drawings provided (*e.g.* Drawing 002 Site Plan) we assume that all the space between the retaining wall and Units 1 and 2 is at the same level, or as close to this as drainage needs allow. The plans do not show what this level is, and consequently how much lower the PPOS is than the floor of the Units. While we assume that this drop complies with the Access and Mobility Code and AS4299 requirements, this has not been demonstrated.
30. Unit 1 fails to comply, as there is a short stub wall sticking out from the Unit next to the gate into the PPOS. This reduces the minimum linear measurement to 5.1m (in our estimate given the paucity of measurements in such documents as Drawing 002 Site Plan or Drawing A121 Public Register Floor Plan). Also the length of the PPOS appears to be measured to the outside of the retaining wall rather than the inside, reducing the minimum dimension in that direction to 5.8m or so.
31. In addition, there are stairs from the PPOS to the Private Open Space (POS) between the retaining wall and the courtyard wall and block boundary. This area would, as a result, not be accessible by Supportive Housing tenants with limited mobility, and consequently cannot count toward the Private Open Space total. It also violates the continuous accessible path requirements of the Access and Mobility Code. The introduction of these steps is puzzling because this amendment to the DA removes a similar set of steps formerly shown giving access to the POS beyond the PPOS for Unit 2. Presumably this removal was based on the realisation that such steps interrupt the continuous accessible path, the same reason we object to the steps to access the POS for Unit 1
32. Unit 2 also fails because it has a stub-wall similar to that in Unit 1, continuing the line of the eastern wall of the Unit, protruding into the PPOS, again reducing the minimum linear dimension to about 5.4m.
33. Unit 3 fails because of a similar stub-wall protruding into the PPOS.
34. Unit 4 fails because the square in which the PPOS’ 6m diameter circle is inscribed has rounded corners. This means that the north south dimension of the PPOS square is less than the required 6m at the two north side corners.

Rule 72 Driveway Verge Crossings (Dimensions and Clearances)

35. Rule 72 sets out requirements for the dimensions and properties of a driveway as it crosses a verge; its angle (from horizontal and to the line of the street); its setbacks from curves, stormwater sumps, sewer manholes, telecom sumps, light poles, and street trees (mature, small, and new); and compliance with Australian Standard AS2890.1 – Off Street Parking. It notes that ‘a condition of development approval may be imposed to ensure compliance with this rule’.
36. It appears that there was some doubt that the original DA did comply with this rule because ACTPLA imposed conditions in the Notice of Decision requiring that ‘proposed clearances from the closest edge of the driveway of infrastructure assets such as stormwater sumps, sewer manholes, fire hydrants and telecom pits (minimum distance 1.2m) and street lighting, power poles, mini-pillars, signage, etc,(minimum distance 1.5m) be shown on the driveway plan as necessary’.
37. The original DA’s Driveway Plan is Drawing C0621 Revision C, dated 22 June 2022, mislabelled ‘Pavement Plan’. This is restricted to details of the driveway verge crossing construction. The drawing ‘202 Verge’, revision B, dated 21 June 2022 gives the location of existing trees on the verge, together with tree protection notes and detailed instructions about the planting of a replacement Claret Ash (*Fraxinus oxycarpa*) to replace the existing one, which is to be removed to make construction easier. This drawing also includes a tree assessment schedule in the bottom right corner which recommends the removal of 11 of the 15 trees on the block and the adjoining Verge. Neither of these drawings gives any information about the location of any of the various infrastructure assets cited above.
38. Revised drawing C0621 revision D, dated 24 February 2023, part of the revised DA, contains no more information about street infrastructure assets. There does not appear to be any analogue for original drawing 202 ‘Verge’ amongst the revised DA papers.
39. It appears that the proponent has chosen to ignore ACTPLA’s condition on the need to identify infrastructure assets on a Driveway Plan, at least at this stage. Consequently, the revised DA could not be characterized as compliant with this rule.

Rule 74 Provision of Car Turning Spaces

40. Rule 74 requires that “Turning spaces are provided on the block to allow vehicles to leave in a forward direction.”
41. The original turning templates (Drawings C0901 & C0902 both version C dated 22 June 2022 titled ‘Vehicle Turning Path Plan Sheet 1 and Sheet 2 respectively) have been replaced with drawings of the same number and title but labelled version G dated 12 April 2023.

42. Clearly the original turning templates were non-compliant, because the test vehicle or its 300mm body envelope was shown driving through a door jamb when entering the garages of all Units. In the revised drawings the car trajectories have been adjusted so that the car envelope (taking a charitable approach because of the small scale of the drawings) just touches or grazes the door jamb with all four garages.
43. The adequacy (or inadequacy) of Vehicle turning arrangements is a function of vehicle size (dimensions), turning radius, driveway width, and garage dimensions. We presume that the correct values for all these variables were fed into the algorithm to produce the inadequate vehicle trajectories shown in the original versions of drawings C0901 and C0902. Without any precise advice on what has been changed to make the trajectories acceptable we see no reason to accept the revised turning templates as providing an accurate demonstration of turning feasibility (we do not regard the claim on p.3 of the s144 Application “Unit 3 and 4 garages increased in sizes” as conveying much useful information).
44. As the details (dimensions, turning radius) of a B99 vehicle are fixed, as is the width of the driveway between Units 1 & 2 and Units 3 & 4, the only element that appears adjustable are the door widths of the various garages. The original Drawing A005 ‘Parking & Driveway Plan Revision P3 of 8 June 2022 shows that the two-car garage in Unit 4 was 5.706m wide. Dimensions were not given for other garage doors but the door for Unit 3 appears to be the same size. The measurement 6.380m is not the width of the door, as if it were there would be no wall to the right of the door to which to attach the door. No dimensions are given for the single car garages in Units 1 & 2 but measuring these against the known width of the garage door of Unit 4 indicates that these are 3.866m wide. The revised version of Drawing A005 indicates that the door width for garage 4 (and presumably also for garage 3) has been increased to 5.948m, or a widening of 242mm.
45. The Garage doors for Units 1 and 2 are apparently unchanged from their width in the original drawings as both the original and the revised Access Report prepared by Eric Martin and Associates indicates that the garage doors of Units 1 and Unit 2 are 3800mm wide. This also indicates that while the garages of Units 3 and 4 are 3800mm plus 2400 mm for the second car (a standard car park width) or 6200mm wide. This appears to be wider than the 5948mm specified on the plans. The garage doors for all Units appear to be the same width in the original and the revised versions of Drawings C0901 and C0902.
46. While the doors to the double garages attached to Units 3 & 4 have allegedly been widened (whether or not this is shown on the turning templates) we revert to our observation in paragraph 42 above that there were difficulties with vehicles entering all of the garages in the development, not just those entering the garages of Units 3 & 4. If no change has been made to the doors of garages attached to Units 1 & 2, we cannot see how the faulty trajectories shown in the original turning templates can have been remediated into successful trajectories in the revised turning templates. All this leads the GNCA to doubt the validity of the new trajectories shown.

47. Furthermore, some of the illustrated trajectories look unrealistic, with sudden changes in the direction of the car and envelope line on entering the garage shown for Unit 2, Unit 3 and Unit 4. No lines, let alone dimensions are provided for the side and rear walls of the garages, so we cannot know how close the cars are to the walls or what clearance is available at front or rear. This is discussed further under Rule 77 below.
48. The drawings seem asymmetric, in that the paths for vehicles entering or leaving garages in Units 3 and 4 closely approach the front walls of Units 1 and 2 on the other side of the drive. In contrast, cars entering or leaving Units 1 and 2 seem to be backing into an unbounded space. Why are the opposite units shown in some drawings but not others?
49. Entering the garage of Unit 2 is shown as requiring a complex three-point turn, while exiting apparently only requires backing out of the garage and then driving out of the site. How realistic is this difference? By contrast the visitors' car park involves a complex three-point turn both entering and leaving. This will likely deter many aged drivers.
50. The GNCA assesses the turning templates as unrealistic, particularly considering the apparently narrow garage entrances. The DA consequently fails this Rule.

Rule 77 Residents' Car Parking

51. Criterion 77 requires that, amongst other things, car parking for residents achieves:
 - reasonable residential amenity; and
 - the reasonable requirements of residents for car parking
52. As these are to be Supportive Housing residences they must, in accordance with this rule (as well as Rule 4 of the RZDC), comply with the provisions of AS 4299 in relation to parking. This document requires that "Garages and carports shall have minimal internal dimensions of 6.0m x 3.8m. A 2.5m internal vertical clearance is desirable". While the plans give no dimensions for the garages, as mentioned in paragraph 45 above the revised Access Report advises that the single garages in Units 1 & 2 are 3.8m wide. Similarly, the two car garages in Units 3 & 4 are 6.2m wide, comprising one space 3.8m wide and a further space 2.4m wide. In other words, there is to be one disabled parking space and one normal parking space. The length of the parking spaces in any of the Units is not given and it would seem unwise to make any unsupported assumptions about this.
53. The GNCA is of the view that the correct reading of AS 4299 clause 3.7.2 is that both car parking spaces in the double garages should be disabled parking spaces. The correct course of action by ACTPLA would be to determine that the second 'normal' carparking space in each double garage was inadequate for compliance, and leave it to the proponent to take the matter to the Tribunal if it felt sure this view was incorrect.
54. It is not clear whether the B99 cars have been drawn to scale in the turning template drawings (C0901 and C0902), but if they have any relationship with reality, the double garages are going to be very cramped. In the two car garages the cars look very close together, so close that a normally abled driver would have difficulty accessing the driver's door of a front facing car parked on the right-hand position. Consequently, access would

be impossible for someone using a wheelchair. If this were the case the DA would fail to comply

55. Nothing in the DA demonstrates how disabled residents will be able to access their cars, and consequently the DA does not comply with this rule.

Rule 82, On-Site Visitors Car Parking

56. Criterion 82 requires amongst other things that on Site Visitor Parking must be “accessible for all visitors”. It is not clear whether this means that the Visitor on-site parking must be accessible parking. If this is the case, then the DA is not compliant with this rule.

57. In the comments in the s144 Statement the proponent raises the matter of *Elliott & Anor v ACT Planning and Land Authority & Anor (Administrative Review)* [2023] ACAT 7 (‘Elliot’) and refers to Clause 2.2.4 of the Parking and Vehicular Parking General Code (PVAGC) p.4. This provides that:

“Notwithstanding any provision in the Building Code of Australia or in AS2890, parking spaces for people with disabilities are to comprise a minimum of 3% (rounded up to the nearest whole number) of the total number of parking spaces required in accordance with this code with a higher provision rate required for carparks serving health facilities and other facilities which provide services for aged persons and people with disabilities.

This requirement does not apply to the parking provided for residents in residential developments in any zone (as these are subject to adaptable housing requirements) but it does apply to visitor parking provided for such residential developments.”

58. The proponent states in the s144 Statement “The accepted interpretation of Clause 2.2.4 per *Elliot* was that the visitor parking needed to be designed as a space for a person with a disability i.e., AS2890”. There are six parking spaces provided for residents in the DA, so 3% of this amount would be 0.18 parking spaces. But as this is to be rounded up to the nearest whole number, then one accessible visitor’s parking space must be provided.

59. The GNCA notes that the proponent appears to have decided that the visitor parking space provided does not need to be accessible despite its acknowledgment of the Tribunal’s views. The proponent is entitled to take this view, presumably expecting that if ACTPLA does not agree, the issue will be corrected with an imposed condition, a relatively risk-free approach that might avoid a troublesome expense. Resolution of the issue is not so simple for ACTPLA, and the GNCA would suggest seeking legal advice before going against an expressed view of the Tribunal about the accepted interpretation of this provision.

60. The GNCA believes that compliance with this rule has not yet been determined, and that consequently ACTPLA should decide that the DA does not comply. It is up to the proponent to take the matter to ACAT if it holds a contrary view.

Rule 83 Off-Site Visitors Car Parking

61. Criterion 83 requires that “Visitor parking is accessible to all visitors” whether on or off site. This might be taken as an endorsement of the requirement that at least some visitor parking spaces are accessible parking, and hence the conclusion discussed in paragraph 57 above. The question would then become “Can on-street parking be regarded as accessible parking?”
62. The GNCA’s view is that this cannot be the case as on-street parking does not provide that additional 1.4m of space beside the car to permit the unloading of a car top wheelchair. In the absence of accessible on-site visitors’ parking the DA would not comply with this rule.

Parking and Vehicular Access General Code (PVAGC)

63. The PVAGC requires (p.16) that Attached houses provide:
“A minimum average provision of 1.5 spaces per two bedroom dwelling, provided that each two bedroom dwelling is allocated a minimum of one (1) parking space and each two (2) bedroom dwelling is allocated no more than two (2) parking spaces;
or
Two (2) parking spaces per two bedroom dwelling”
64. As there are four two-bedroom units the total number of residents’ car parking spaces is 6, so the DA is compliant. While perhaps not a planning matter, the GNCA does question the proposed allocation of parking spaces. The GNCA’s experience of similar cases is that each dwelling should be provided with a single parking space, with the remaining per dwelling half space entitlement pooled as shared outdoor residents’ parking.
65. Allocation of one car parking space to each of two dwellings and two car parking spaces to the remaining two dwellings seems likely to become a source of tension between tenants, with those arbitrarily allocated to a single garage unit resenting those allocated a two car garage unit. The Commissioner might find it worthwhile devoting more thought to reducing conflicts between its tenants.

Water Sensitive Urban Design General Code

Rule 1, Mains Water Use Reduction Target

66. Rule R1 requires a 40% reduction in water use compared with 2003 usage. The rule is mandatory and there is no Criterion.
67. The Spreadsheet is a black box. Numbers get fed in and the answer is spat out. But no-one has been able to explain how the spreadsheet works. While the answer the spreadsheet gives may be correct this cannot be demonstrated to be the case. Compliance is taken on trust, rather than demonstrated.

68. Compliance with the 40% water reduction has not been demonstrated. The DA is consequently non-compliant.

Rule 2, Criterion 2, On-site Storm Water Retention

69. Rule R2 applies to any development in an existing urban area where the impervious area is increased by 100m² or more. The Rule consequently applies.

70. Rule R2 requires a stormwater storage capacity of 1.4 kL per 100m² of the total impervious area of the site, and use of this stored water on site, or as an alternative, the capture, storage, and use of the first 15mm falling on the site.

71. The Water Reduction Spreadsheet of 21 April 2023 advises that the total roof area is 673m² and total impervious pavement or driveways 570m², for a total impervious area of 1,243m². Only 324m² of roof area drains into the tanks. Each Unit has a 5.0 kL rainwater tank for a total of 20.0 kL rainwater storage. The required stormwater storage capacity is 12.43 x 1.4kL = 17.4kL. However, this only leaves 2.6kL for stormwater detention.

Rule 3, Criterion 3, On-site Storm Water Detention

72. Rule R3 applies to any development in an existing urban area where the impervious area is increased by 100m² or more. The Rule consequently applies.

73. Rule R3 requires that Stormwater Detention measures are provided and achieve all of the following:

- a. capture and direct runoff from the entire site
- b. Stormwater storage capacity of 1kL per 100m² of impervious area is provided to specifically detain stormwater generated on site
- c. The detained stormwater is designed to be released over a period of 6 hours after the storm event.

74. The impervious area of the site is given as 1,243m², so a storage capacity of 12.43kL is mandated for temporary storage of rainfall for a period of up to six hours after its capture.

75. The 'Civil Statements Against Relevant Criteria' says against this item that "This rule is satisfied as the onsite detention tank captures runoff from entire site and has sufficient capacity. Refer to C0401 Stormwater Plan."

76. 2.6kL of storm water detention capacity is well below the 12.43kL capacity mandated by the rule. We cannot identify any separate stormwater 'detention tank' on drawing C0401.

77. It appears that while the DA is compliant with Rule 2 it is not compliant with Rule 3.

Assessment of the Amended DA against the Identified Amendments

78. The s144c Statement lodged by the proponent as part of the revised DA lists the changes made to remediate the flaws in the original DA. These are identified below in italics with our comments following.

1. *Schedule of areas updated accordingly.*

79. Plot ratio and site coverage numbers are given in Drawing A121 'Public Register Floor Plan' Revision P3 of 8 June 2022 (and also in Drawing A010 'Area Plan' Revision P2 of 24 June 2022). These numbers were revised for the revised DA in Drawing A121 'Public Register Floor Plan' Revision P7 of 12 May 2023 and Drawing A010 'Area Plan' Revision P7 of the same date.

80. The revised numbers increased the floor areas of Units 3 & 4 from to 141m² and 147m² to 145m² and 152m² respectively, increasing the GFA for the block from 556m² to 565m² and the plot ratio from 33.8% to 34.3% (generously rounded down to 34% in the documents). As the Driveway and Parking area was understated as 358m² in the earlier drawings rather than the 370m² in the revised DA documents, the Site Open Space reduced from 733m² and 44.5% to 712m² and 43.2%.

81. No explanation is given in the revised DA documents as to what led to the change in reported areas, nor why the earlier erroneous figures always erred in the proponent's favour (underestimated floor areas, overestimated open space). The revisions amounted to an increase in the Plot Ratio of 0.5%. As the now claimed plot ratio is within 0.7% of the permitted 35.0% a further revision of much the same magnitude, would lead to the rejection of the entire DA as the maximum plot ratio limit is mandatory. Under these circumstances, what guarantees are there that the currently offered numbers are correct. A credible explanation for the errors and an independently and easily replicated algorithm for calculating the areas would be necessary to dispel these doubts.

2. *Courtyard walls and principle private open space amended.*

82. This refers to the modifications to the Courtyard Walls for the two street fronting Units 1 & 4. The original single courtyard wall for Unit 1 has been replaced by a courtyard wall enclosing a small strip with a battered strip of space leading from the level of the Principal Private Open Space (PPOS) behind a retaining wall to natural ground level along the boundary. Similar battering is proposed for the courtyard of Unit 2 to replace the steps shown in the original DA papers. Strangely the revised plans show steps leading from the (presumably level) ground in the PPOS of Unit 1 to the battered area. Such steps would not be consistent with the various mobility and access codes.

83. The other courtyard wall to be modified is that for Unit 4, which has been reduced in length to permit street surveillance from a window into the living room of Unit 4.

3. *Principle private open space amended – stair removed, landscaped battered zone introduced.*
84. This refers to the removal of the steps formerly proposed for the PPOS for Unit 2, and the battering of some of the Private Open Space (POS) for both Units 1 and 2 from the level of the PPOS down to natural ground level at the boundary of the block.
4. *Clothes line locations amended to allow accessible clearances.*
85. In response to comments from the ACAT members, the proponent has ensured that there is at least 1.5m clearance between the clothesline of Units 1 and 2 and the rainwater storage tank for each of these units. However, this principle has not been universally applied – see our comments under Amendment 6.
5. *Bin enclosure locations amended.*
86. The bins for Units 3 and 4 formerly shown as located in the utility are between the two Units where access to the bins could (would) have been blocked by a visitor's vehicle, have been moved to a location in the rear area of Unit 4, and in front of the PPOS for Unit 3, on the pathway leading to the front door of the Unit. This seems to be an unsuitable location, but it seems that the Government tenants will just have to lump it.
6. *Unit 3 and 4 garages increased in size and utility area reconfigured.*
87. The proponent states that the garages have been increased in size but no dimensions for the size of this increase are given on the plans. The utility area was reconfigured with the removal of the rainwater storage tank for Unit 3 from this area. Part of the fence between Units 3 and 4 in this area is moved slightly to the north to allow access past Unit 4's rainwater tank. Rubbish bins have been removed from the utility area.
7. *Bike storage sheds added to all units.*
88. Bike storage areas have been introduced in the POS areas of all four Units. It is possible that bike users in units 3 or 4 might find it difficult (particularly if in Unit 3) to get their bikes on to the driveway if there is a visitor's vehicle in the visitors' parking area.
8. *Window amended to allow sufficient street surveillance.*
89. This refers to the introduction of windows facing the street into the living rooms of Units 1 and 4. Whether there was a pre-existing window in the living room of Unit 4 blocked from surveillance by the courtyard wall is impossible to tell from the current plans.
9. *Furniture in all living rooms amended – complying with SHGC and AS4299.*
90. Consistent with the refusal of ACTPLA to display essential plans if these might be thought to reveal details of internal layout, there is no evidence in the notified papers that

any action in this area has been undertaken. Why any credibility should be extended to ACTPLA in this regard is not clear.

10. Natural ground lines clearly illustrated on relevant drawings.

91. Natural groundlines are now shown, but not the levels of filled areas behind retaining walls.

11. Shadow diagrams amended in accordance with ACAT comments.

92. We are unaware of the comments made by ACAT and they are not disclosed in the notified documents.

12. Operational car space added.

93. The visitors car parking space between Units 2 and 3 has been renamed as Operational Parking. This has halved the provision for Visitors' Parking.

13. Roof area to rainwater tanks amended.

94. The initial DA papers included drawings A110 'Roof Plan' Revision P6 dated 8 June 2022' and C0401 'Stormwater Plan' Revision C dated 22 June 2022. These plans indicated the location of 4 x 5kL rainwater storage tanks, one for each Unit, but did not show any downpipes. In the revised DA drawing A110 Revision P10 dated 12 May 2023 shows the rainwater collection area of each unit's roof. Unit 1 has 59m², Unit 2 has 59m², Unit 3 has 98m² and Unit 4 108m². The total collecting area is 324m² and the total roof area is 670m². The collecting areas show a wide variation. For the roof as a whole capacity is 16.2m²/kL; for Units 1 & 2 there will be 11.8m²/kL; for Unit 3, 19.6 m²/kL; and for Unit 4, 21.6m²/kL. Consequently Unit 4's tank will fill almost twice as fast as Units 1 & 2.

95. If, as expected, Canberra returns to an El Nino weather pattern with frequent droughts and watering of gardens with stored rainwater there might be tensions if Units 3 & 4 and were perceived as having twice as much water as Units 1 & 2. Some system to even up the collection areas of all tanks or ensure garden watering drawdown is shared equally between all tanks might resolve this.

Response to ACTPLA Conditions in the Notice of Decision of 30 August 2022

1 A new survey of the new consolidated block created by the proposed merger of the two existing blocks, showing amongst other things the surveyed block size (presumably the area in square metres);

96. No new survey was included in the revised DA papers that have been notified.

2 *A turning template for the eastern most hardstand car space demonstrating vehicles can exit the site in forward direction and in safe manner from this space*

97. New turning template drawings have been produced. Whether these demonstrate that turning is possible is moot.

3 *A new driveway plan showing the new driveway would have clearances of at least 1.5m from any street lighting, power poles, mini-pillars, signage, etc, and at least 1.2m from stormwater sumps, sewer manholes, fire hydrants and telecom pits*

98. No new driveway plan showing the location of territory assets has been produced. Perhaps there are no street lighting, power poles, stormwater sumps, sewer manholes, fire hydrants and telecom pits etc. in the relevant stretch of Roe St, but perhaps the proponent could advise us that this is the case.

4 *An updated site plan which must show proposed letterboxes clear of the sight triangles which must be provided on both sides of the driveway at the front boundary of the block.*

99. We haven't identified any specific plan demonstrating this.

5 *A Landscape Management and Protection Plan (LMPP) and a Dilapidation Report for all Government Assets (edge of roads, kerbs, footpaths, SW pits, vegetated verge areas, etc) adjacent to the site, clearly showing the condition of Government Assets, especially any pre-existing damage, to be submitted prior to commencement and on completion of the work.*

100. No such plans appear to have been prepared to date..

6 *A Waste and Recycling Management Plan (WRMP) for the new development prepared in accordance with the ACT's DCC Waste Code 2019*

101. Drawing C0801 revision G dated 12 April 2023 shows the location of bins and the longest path to put bins out. Whether these arrangements have been endorsed by TCCS is not known. Nor do we know if the Commissioner for Housing proposes to provide assistance of some kind to Supportive Housing tenants in putting out and bring in their bins.

7 *All external lighting for the building is to comply with following Australian Standards: AS1158.3.1- 'Pedestrian Lighting' and AS4282 – 'Control of the Obtrusive Effects of Outdoor Lighting'*

102. Drawing E002 'Electrical Services Site Plan Revision 3 dated 4 April 2023 show external lighting. Whether this is adequate is unknown.

8 *The development is to comply with relevant provisions of 'AS1428.1-2009 Design for Access and Mobility', any relevant provisions of the Premises Standards 2010 and the Disability Discrimination Act 1992 as applicable.*

103. Despite the revised Access Report, it is not clear if the DA meets every requirement of these standards

9 *The development must consider and apply any recommendations as noted in the Access Report, prepared by Eric Martin, dated 27 June 2022*

104. The Access Report by Eric Martin states under Section 5 Documentation and Constructions that “(I)t is critical that the documentation phase carefully details all the required elements and then that they are built correctly to ensure the completed project will comply.” Whether this injunction will be obeyed is unknown. Who will enforce it? Hence ACAT’s requirement that the necessary features for Accessible Housing be constructed now, not at some nebulous time in the future.

10 *The proposal must be in accordance with relevant provisions of the Australian Standard AS1428.1-2009 and AS/NZ 2890.6-2009 and the National Construction Code.*

105. Again, this is why ACAT believes compliance with these Codes must be built in during initial construction.

PART B

B.1 Minister Rachel Stephen Smith has said that “it is easier to do good development and harder to do bad” under the proposed new planning laws. Perhaps, but it is **possible to do good development under the current law** by properly applying it. It is possible in this case if the decision maker uses the discretions present in s.120.

B.2 The **outcome** of this proposed DA is that Roe St, which is a small street, will have 70% social housing. In addition, there will be further conglomeration of social housing in the area when the social housing in adjacent streets is considered. Good planning and government policy says this a poor outcome (see below). Proper application of s.120 of the *Planning and Development Act 2007* (PDA) would prevent this outcome.

Roe Street Griffith

B.3 The proposed development is in Roe Street, which is 150 metres long and has 12 blocks. Of those blocks three are corner blocks with residences facing the adjoining streets so that leaves nine blocks facing, and interacting mainly with, Roe St (see figure B below). Two Roe St blocks have already been joined in a development similar to the proposed development but with five dwellings. On the 9 blocks in Roe St (engaging with Roe St), there are eight public residences and four private (50%) (see Figure B below). The proposed development will increase that number to 10 public residences and four private. If the residences facing the other streets are included it is still 10 public and eight private.

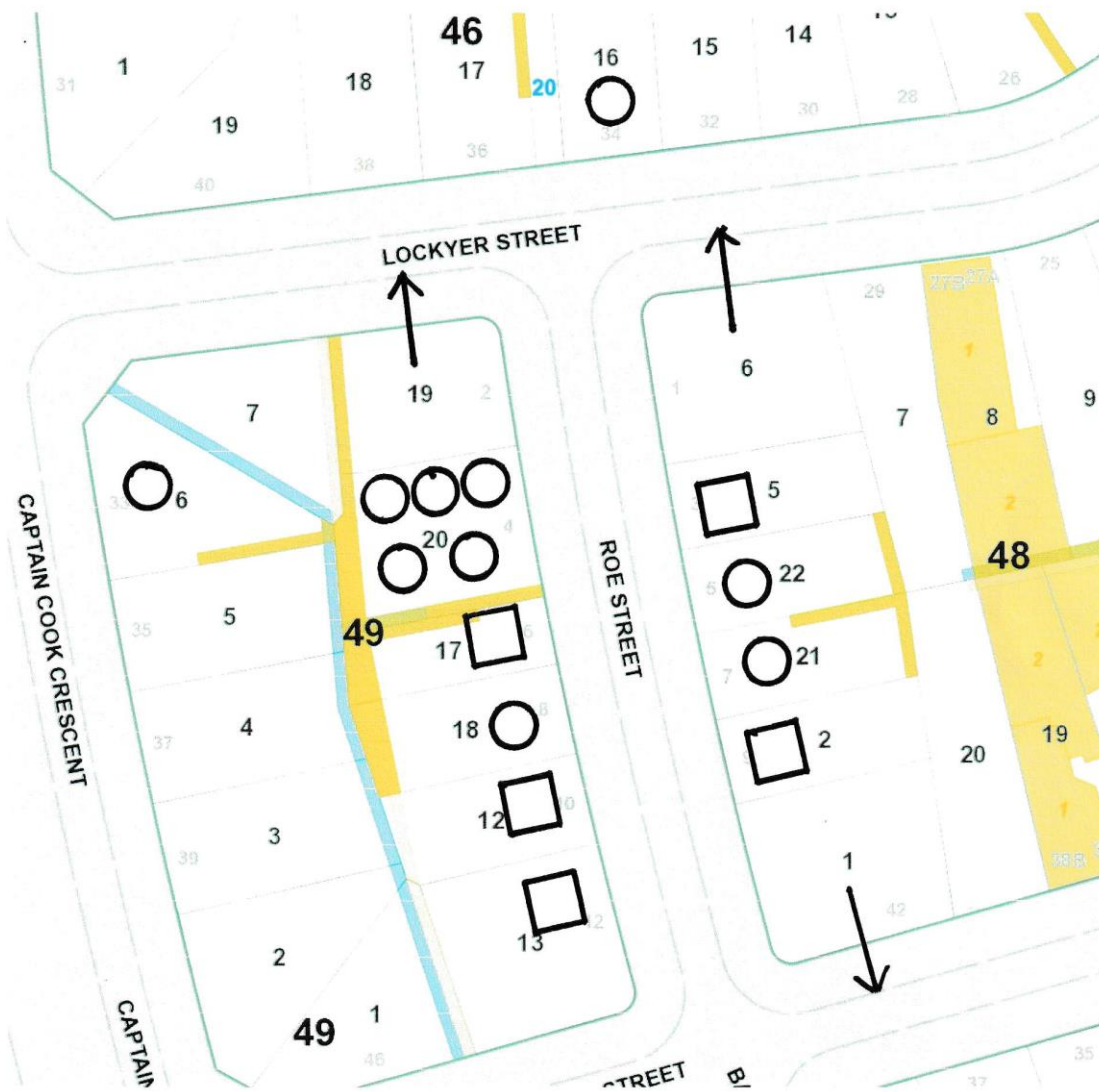
B.4 Griffith was planned by Walter Burley in 1918 and gazetted as a division name on 20 September 1928.¹ Roe St appears on the early maps of Canberra. The original pattern of the subdivision occurred in 1930 and the brick houses in Roe St were completed in 1939. Recovery after World War One and the Great Depression delayed construction. *Griffith is known for its beautiful streetscapes with generous streets, wide verges containing mature trees, and many original rendered, painted and red brick homes with pitched terracotta tiled roofs and attractive front gardens.*² Roe St currently has these characteristics.

B.6 The figures below show:

- A Roe St – Map showing existing public residences and private residences
- B Roe St – Map showing proposed public residences and private residences

¹ Griffith Neighbourhood Plan p.4

² Griffith Neighbourhood Plan p.5



A. Roe Street – Map of Blocks and Sections showing existing public and private residences.



Existing public residences on Roe Street and on adjacent streets

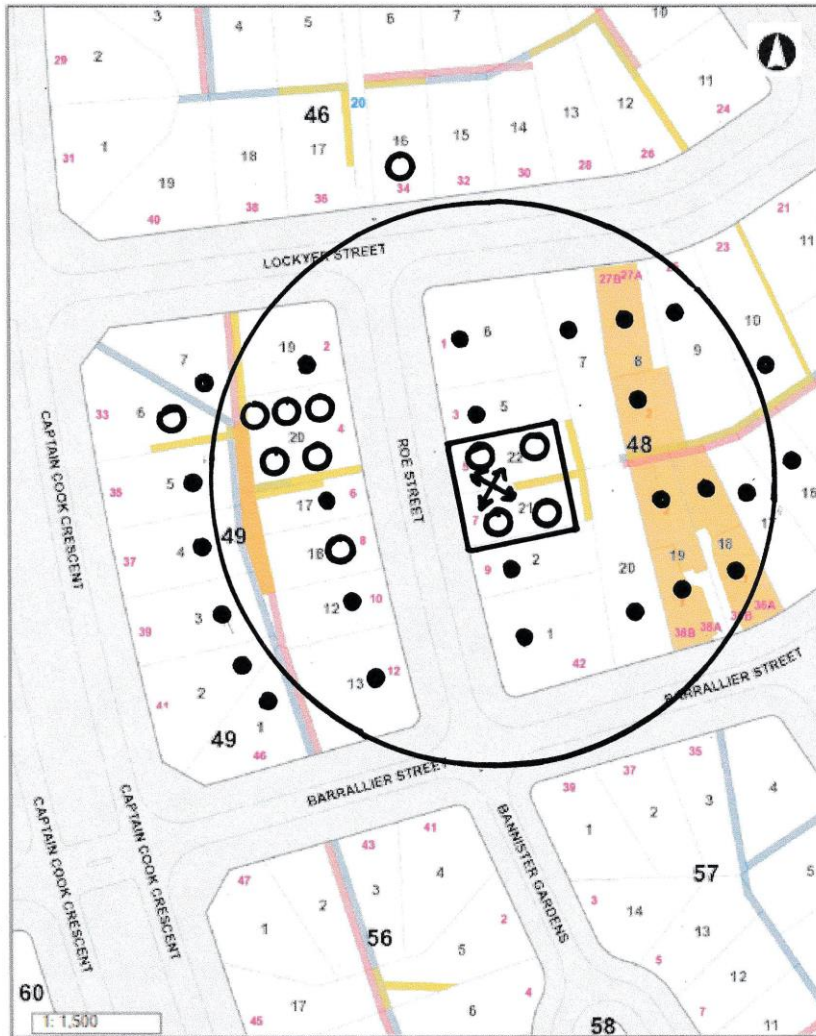


Private residences on Roe Street



Outlook of three corner houses to cross streets

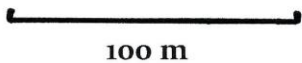
Roe Street, Nos. 5&7 – 100m radius – residences by ownership



Public: ○ n = 11 within 100 m or 30 %

Private: ● n = 26 within 100 m or 70%

Total: 37



B. Roe Street – Map of Blocks and Sections showing proposed public and private residences

Previous decision

B.7 In the original decision on this DA (see para 3 above) the delegate (the first decision maker said: “The objectives of the RZ1 zone have been considered. In general, the assessment found the development was not inconsistent with the zone objectives.” (Part B p 7).

B.8 The first decision maker said (Part C p.8):

CONCENTRATION OF PUBLIC HOUSING IN THE AREA

The proposed development for supporting housing on the subject blocks, which are zoned as RZ1 Suburban Zone, is listed as an assessable development under the RZ1 development table. The application also includes a lease variation to add supportive housing as a permissible use. The proposed development and lease variation is considered consistent with the Planning and Development Act 2007 and the relevant codes in the Territory Plan subject to conditions which have been imposed in Part A of this Decision. On this basis, the authority considers this proposal as a suitable development for the subject site.

ZONE OBJECTIVES

The development generally meets the zone objectives, given the single storey nature of the development and the large, consolidated block size (1647m²). The Authority considers the proposed development meets the RZ1 zone objectives and item c) in particular: “Provide for a wide range of affordable and sustainable housing choices that meet changing household and community needs”.

DENSITY

The development is rule compliant in terms of both the yield outlined in the Multi-Unit Housing Development Code and the plot ratio outlined in the Residential Zones Development Code. The development is reasonable in terms of density and consistent with the Territory Plan.

SITE SUITABILITY & IMPACT ON THE DESIRED CHARACTER OF THE NEIGHBOURHOOD

The proposed development is consistent with the desired character of the area. The dwellings are single storey, achieve adequate setbacks to all block boundaries and contributes positively to the streetscape in terms of architectural design and landscaping; this is consistent with the RZ1 zone objectives and the requirements of the Territory Plan.

B.9 The GNCA has regard to those reasons of the first decision maker in presenting the following submissions to the decision maker on this amended DA.

Section 120

B.10 The PDA s.120 provides (notes omitted):

Merit track—considerations when deciding development approval

In deciding a development application for a development proposal in the merit track, the decision-maker must consider the following:

- (a) the objectives for the zone in which the development is proposed to take place;*
- (b) the suitability of the land where the development is proposed to take place for a development of the kind proposed;*
- (c) if an environmental significance opinion is in force for the development proposal—the environmental significance opinion;*
- (d) each representation received by the authority in relation to the application that has not been withdrawn;*
- (e) if the design review panel provided the proponent with design advice about the development proposal—
 - (i) the design advice; and*
 - (ii) the proponent's response to the design advice;**
- (f) if an entity gave advice on the application in accordance with section 149 (Requirement to give advice in relation to development applications)—the entity's advice;*
- (g) if the proposed development relates to land that is public land—the public land management plan for the land;*
- (h) the probable impact of the proposed development, including the nature, extent and significance of probable environmental impacts.*

This section uses the mandatory word “must” and requires that the decision maker consider all the matters listed in deciding a development application:

The expression has been held to require the decision-maker to give “proper, genuine and realistic consideration” to the factors specified: Zhang v Canterbury City Council (2001) 51 NSWLR 589; Botany Bay City Council v Premier Customs Services Pty Ltd [2009] NSWCA 226.³

Subsection a: zone objectives

B.11 The zone in which the proposed development is proposed is RZ1. The zone objectives for the RZ1 zone are:

³ *Baptist Community Services v ACT Planning and Land Authority* [2013] ACTSC 103 at 16.

- a) *Provide for the establishment and maintenance of residential areas where the housing is low rise and predominantly single dwelling and low density in character*
- b) *Protect the character of established single dwelling housing areas by limiting the extent of change that can occur particularly with regard to the original pattern of subdivision and the density of dwellings*
- c) *Provide for a wide range of affordable and sustainable housing choices that meet changing household and community needs*
- d) *Ensure development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties*
- e) *Provide opportunities for home based employment consistent with residential amenity*
- f) *Provide for a limited range of small-scale facilities to meet local needs consistent with residential amenity*
- g) *Promote good solar access*
- h) *Promote energy efficiency and conservation*
- i) *Promote sustainable water use*
- j) *Promote active living and active travel*

B.12 The GNCA refers, to objectives a, b, c and d. It notes that all objectives have equal status and the decision should not give one priority over another. Rather all the objectives must be considered.

12.1 **Objective a**

- Low rise – the proposed development is single storey. The first decision maker took this into account.
- The proposed development is not single dwelling. It replaces two semi detached dwellings on two blocks with four dwellings on those two blocks. There will be two single dwellings on each block.
- The proposed development is not low density because there will be a significant increase of infill on the two blocks and an increase of higher density housing in a low density residential area.
- One third (4) of the blocks on a 12 block street that had a pattern of single dwelling single storey houses would become higher density under the proposed DA.
- The first decision maker found the density reasonable having regard to the Multi-Unit Housing Development Code and the plot ratio outlined in the Residential Zones Development Code. It was possible to reach this conclusion by considering density on the two subject blocks, rather than the street as a whole. But objective a requires consideration of “residential areas” and refers to “housing” in the plural meaning that density must be considered in a broader context.
- Objective a of RZ1 requires the “establishment and maintenance of residential areas where the housing is...predominantly...low density”. The question for

decision is whether the density resulting from this DA will make the housing in this residential area not predominantly low density. And the answer is yes because one third of the street being higher density – and across the road from each other – does not maintain the predominant pattern of low density, single dwellings envisaged in the RZ1 zone objective a.

12.2 *Objective b*

- The original pattern of subdivision was established around 1930 and the brick homes in Roe St were completed in July 1939.⁴
- The original pattern has already been disrupted by the combination of 2 out of 12 blocks (one sixth of the street). The proposed development would increase the change to 4 out of the 12 blocks or one third of the street.
- The density of the dwellings has already been changed from the original pattern by a twofold increase on two blocks and their amalgamation. The proposed development would double this density causing yet another break in the original pattern of subdivision on a small 12 block street.
- The change to pepper potting 70% social housing should be “limited” as unduly changes the character of the area.

12.3 *Objective c*

- The proposed development would offer 4 two bedroom units to replace 2 three or four bedroom houses. For privacy reasons no information is available about the configuration of the current houses that are proposed to be demolished. It is not known whether the decision maker has access to this information to base their decision on evidence. The first decision maker did not include it in their reasons.
- The housing needs of the target market for the proposed development are unknown. For privacy reasons no information is available about “household and community needs.” The GNCA has been told that single elderly people and single mothers with children require houses in this area. It has been given no information about the relative costs of maintaining the existing multi bedroom dwellings compared to demolition and rebuilding. It is not known whether the first decision maker has access to any of this information to base their decision on evidence. They did not include it in their reasons, despite giving weight to this objective.

⁴ https://www.archives.act.gov.au/_data/assets/pdf_file/0019/557011/Roe_St_05_Griffith_S48_B22_2012-02151.pdf

12.4 *Objective d*

- The valued features of the neighbourhood are:
 - The historical significance of the suburb.⁵ This includes its origins as part of Walter Burley Griffin’s garden city vision. Roe Street leads into Bannister Gardens which is one of the original street parks that are a key feature of the garden city movement.
 - The ‘garden suburb’ character of its streetscapes, open spaces and single storey residential buildings⁶
 - The fact that it is a peaceful, attractive, safe and accessible neighbourhood⁷
 - Open space between buildings
 - A streetscape of wide verges, generous setbacks and houses open to the street
 - Valuing gardens and trees
 - Cars regarded as a means of transport rather than a focus of a home or development
 - Walking or biking giving access to most amenities
 - A community built upon respect for each other, cultural diversity and values.

- The landscape character of the area is:
 - The properties have a consistent width and the buildings have a consistent scale and form.
 - Roe St properties are consistent with the traditional old inner south character of an area settled in the 1920s. Changes have respected the heritage of the area.
 - The rhythm and pattern of buildings in Roe Street – with the one amalgamation exception – conform with the original subdivision and building framework.

- The unreasonable negative impact of the proposed development is that it would result in more than just “salt and peppering” of social housing in Roe St.

Subsection b: Suitability of the land

B.13 The land is unsuitable for the proposed development because it will create a conglomeration of social housing in the area that is not only contrary to the government’s policy but also does not accord with sound planning practice.

Salt and Peppering

B.14 ‘Salt and peppering’ or ‘pepper potting’ is the urban design practice of mixing social housing into residential neighbourhoods. This tenure diversification is designed to lead to an increased social mix in areas to help create more “balanced” and stable

⁵ Griffith Neighbourhood Plan p.4

⁶ Griffith Neighbourhood Plan p.4

⁷ Griffith Neighbourhood Plan p.4

communities. is “thought to ensure tenure blindness, since homes serving different tenures are, for all purposes, indistinguishable.”⁸ It is also called mixed income housing.

B.15 The ACT Minister for Housing, Yvette Berry has said⁹:

The renewal program has been following and continues to and will follow, the principle of ‘salt and peppering’

*This program accords with best practice urban design.*¹⁰

B.16 The proposed development does not accord with the renewal program or best practice because it is not “salt and peppering”. It reverts to old practice of amalgamation of social housing in a cluster. This is illustrated by the figures above.

B.17 The first decision maker’s response to this (see above) - in summary - was that the rules allowed the outcome of a conglomeration of 70% social housing in Roe St. But the figures above demonstrate the conglomeration that would result from the proposed development and the outcome of that decision is bad planning.

Subsection h: probable impact of the development

B.18 In *Lourandos and Yiannokopoulos & ACT Planning and Land Authority & Ors* (Administrative Review) [2011] ACAT 25 at 59 [at 217 per Senior Member McMichael] the tribunal said:

...Subsection 120(f) refers to “probable impacts including the nature, extent and significance of probable environmental impacts” which clearly indicates that “impacts” other than environmental impacts are envisaged. These might include social impacts and we are satisfied that ... any multi unit development is likely to have adverse impacts on the amenity of neighbours in the precinct, of the kinds identified by Mr Harris

B.19 The probable impact of having 70% social housing in a small street are all the impacts identified in the body of urban planning and other research that led to the sensible adoption of a “salt and peppering” approach.

⁸ Ryan van den Nouwelant & Bill Randolph ‘Mixed tenure development literature review’2016 p.2

⁹ Speech on public housing to the ACT Legislative Assembly 29 March 2017: yvetteberry.com.au/news/latest-news-speech-on-public-housing-to-the-act-legislative-assembly

¹⁰ Bill Randolph and Mark Wood “The benefits of tenure diversification” AHURI Report 60 <https://www.ahuri.edu.au/research/final-reports/60>

Application of s.120

B.20 Section 120 of the PDA gives the decision maker discretion in considering the matters listed in a “proper, genuine and realistic” way. It requires him or her to consider the objectives for the zone (subsection a), the suitability of the land for the development (subsection b), representations such as this one (subsection d) and the probable impact of the development (subsection h).

Yours sincerely

A handwritten signature in black ink that reads "David Denham". The signature is written in a cursive style with a large initial 'D'.

Dr David Denham AM
President
GNCA

5 July 2023